Teknologiateollisuus

Management of PFAS in waste streams

PFAS are used in a wide range of applications and products because of their properties: they withstand high temperatures, pressure, wear and other extreme conditions. For this reason, they are difficult to substitute in numerous technological products, components and applications.

The phase-out of PFAS should be promoted by sharing information on alternatives and substitutes between Member States and sectors. The same applies to the analytical methods used to determine PFAS concentrations. With a view to the EU’s circular economy objectives, it is crucial to ensure that the methods used by Member States to determine PFAS concentrations are harmonised.

Harmonised monitoring and analytical methods

According to Technology Industries of Finland (TIF), there is currently no harmonised monitoring and analytical method for measuring all PFAS, nor is it possible to develop one due to the large number of PFAS. Therefore, the EU should primarily aim for risk-based and waste-stream-specific combinations of analytical and monitoring methods, subject to harmonised guidance.

Waste-stream-specific limit values

In TIF’s view, waste-stream-specific limit values can in principle be promoted for homogeneous waste streams, such as sludge and waste soil. For many product wastes, however, setting and monitoring a concentration limit value is not currently feasible in practice, which is why waste treatment requirements are more appropriate solutions than concentration limit values. From TIF’s perspective, it is not appropriate for complex products to be classified as hazardous waste because of components that may contain very low concentrations of PFAS. At EU level, the aim should be harmonised guidance and standards for separating components containing high concentrations of PFAS and directing them to appropriate waste treatment.

Guidance on safe treatment methods

Guidance on waste treatment methods should be waste-stream-specific and based on scientific evidence. The guidance should consider whether appropriate waste treatment methods exist and whether determining the PFAS concentration of a waste stream is feasible in practice without unreasonable costs.

The guidance should take into account that spare parts and materials needed to repair products placed on the EU internal market may end up in waste streams. Strict waste treatment requirements in the guidance could prevent the reuse of certain products and materials if their PFAS concentrations are too high. This could unnecessarily shorten product durability, lead to costly maintenance requirements, increase the amount of waste and hinder the achievement of the EU’s circular economy objectives.

Targeted short-term measures for waste streams known to contain high concentrations of PFAS

Targeted short-term measures should be approached with caution. If such measures were taken, TIF considers that it would be appropriate to focus them on high-risk waste streams where the source of PFAS and the analytical methods are known, and to implement them within the framework of existing EU legislation.

Extended producer responsibility schemes

Many PFAS-containing products are already covered by extended producer responsibility for WEEE, packaging or textiles. A separate scheme could create an overlapping administrative burden and payments. This would favour an option in which PFAS-related costs are incorporated into existing schemes. In TIF’s view, however, a possible producer responsibility scheme requires further assessment. At this stage, there is not yet sufficient information to assess whether developing the existing EPR schemes or creating a new mechanism would be the more appropriate solution.

Establishment of a separate fund

A separate financing mechanism could cover costs caused by PFAS where they cannot be attributed to an individual polluter. In practice, fund contributions could be collected from manufacturers and importers of PFAS e.g. on the basis of tonnage. Public capital could be channelled to the fund from the EU’s financial instruments, which would be particularly suitable for addressing legacy contamination. In TIF’s view, a possible fund scheme requires further assessment. Under a fund scheme, contributions would also have to apply equally to products imported from outside the EU. Otherwise, the scheme could weaken the competitiveness of EU manufacturers.

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