

## Public Consultation on the revision of the Waste Framework Directive (WFD)

### Response by European Boating Industry (EBI)

The recreational boating industry, represented by EBI, is committed to implementing the circular economy and following the waste hierarchy. This is embodied in the cooperation with the European Commission (DG MARE) through the jointly-led Stakeholder Group on end-of-life recreational boats that is scheduled to concrete recommendations to the EU, Member States, and stakeholders by the end of the year. Its focus is on implementing circular economy principles related to composite waste from end-of-life recreational boats.

Recreational boats have a lifetime of up to 50 years and longer if well maintained with refits allowing use extension. This is positive for life cycle impact and reduces waste through prevention. In addition, 72% of waste from the dismantling of boats is recycled or recovered for energy (composite, wood, and metal)<sup>1</sup>. Critical are composite materials, Fibre Reinforced Polymer (FRP) for which there are currently no large and commercial scale recycling solutions. It is estimated that there are over 6.5 million boats in European waters with the majority smaller than 7.5 m. Previous studies and the SWD on Nautical Tourism<sup>2</sup> have indicated that around 80,000 boats reach end-of-life per year in the EU. The practical experience of several countries shows however that theoretical estimates are not achievable<sup>3</sup>. It can therefore be estimated that a realistic number is 30-40

000 boats reaching their end-of-life each year in the EU.

Within the European composite market, marine (but also including commercial) uses about 72 kilotons of composite in 2019<sup>4</sup>, which is about 2-3% of the total composite sector in Europe. Cross-sectoral cooperation is therefore crucial to approach the full scope of composite waste and achieve scale in recycling.

Several projects and pilot studies have proven the technological potential of end-of-life composite boat waste recycling, but none have so far become commercially viable and available at scale. Only cross-sectoral coordination (such as wind turbines, automotive, construction) and harmonisation of European rules and definitions to align and pool composite waste streams will solve this issue.

Currently, dismantling of recreational boats must take place in specialised waste dismantling centres according to the Waste Framework Directive. This is however not possible in all cases as some units (up to 24m) cannot be transported to the site for technical reasons. On-site dismantling with specific protocols would also allow for cost reductions and be more useful for countries/regions where a smaller number of boats need to be dismantled.

To improve waste treatment and recycling, the following should be considered in the evaluation of the Waste Framework Directive:

<sup>1</sup> APER, <https://www.recyclermonbateau.fr/>

<sup>2</sup> [https://ec.europa.eu/oceans-and-fisheries/system/files/2021-03/swd-2017-126\\_en.pdf](https://ec.europa.eu/oceans-and-fisheries/system/files/2021-03/swd-2017-126_en.pdf)

<sup>3</sup> <https://www.ecologie.gouv.fr/bateaux-plaisance-ou-sport>

<sup>4</sup> JEC market report 2019

- Consider the needs of the recreational boating industry as identified with the European Commission in the **recommendations** of the **Stakeholder Group on end-of-life recreational boats**.
- Create a dedicated **waste code for composite waste** in the European Waste List with sub-codes for end-of-life recreational boat composite waste and sub-codes for all other composite use sectors.
- Ensure waste shipment regulation allows for **cross-border transport of composite material waste** in various stages of treatment.
- Addition of permission of **dismantling outside of waste centres** for end-of-life boats, such as in marinas or boat yards with specific light-touch license for occasional use and allowing **mobile dismantling units**.