

Your Voice In Europe: ROADMAP feedback for Analysis of the interface between chemicals, products and waste legislation and identification of policy options

User's data:

- Domain: Company/Business organisation
- Name: Lettemieke Mulder
- Email: mulder@eurocommerce.eu
- Country: Belgium
- Headquarter: select
- Size: select
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Related document: Analysis of the interface between chemicals, products and waste legislation and identification of policy options

Feedback:

EuroCommerce response to the European Commission Roadmap on the Analysis of the interface between chemicals, products and waste legislation and identification of policy options

To make the circular economy happen, it is necessary to create a coherent policy framework and improve the interplay between the EU's waste laws, chemical legislation and product policies. Retailers and wholesalers therefore welcome the Commission's Roadmap on the Analysis of the interface between chemicals, products and waste legislation and identification of policy options.

We believe it identifies the right types of issues and barriers to be tackled (under "Problem the initiative aims to tackle), based on studies such as "Regulatory barriers for the Circular Economy – Lessons from ten case studies" (June 2016) – and also shown by experience and practice in our sector.

EuroCommerce and its members already play their part in supporting the transition to a circular economy, and are looking at how our sector can play a role in prevention, re-use and recycling of waste. We also support the objective to maximise the value of products, materials and resources in the economy for as long as possible, and where this makes both environmental and economic sense.

We are, for example, offering our customers responsibly sourced products, using packaging with reduced environmental impact, and exploring opportunities for linking suppliers and customers of secondary raw materials through reversed logistics. In order for retailers and wholesalers to further play an active role in the

transformation towards a circular economy, the sector's specific role and needs have to be duly taken into account.

More specifically, we welcome plans to promote competitive markets for secondary raw materials. There is a need for sorting and re-processing infrastructure, the development of end-of-waste criteria for secondary raw materials, avoiding unnecessary waste classification where further use is safe and legal, a clear-cut separation between municipal and commercial waste, and for simplifying cross-border formalities.

Hazardous substances should continue to be regulated by legal acts like the REACH Regulation or the RoHS Directive. In this context, it is of great importance that legislation regulating the production phase as well as the properties of a product are aligned with waste legislation. We also support keeping a clear list-based and risk-based approach for classifying non-hazardous and hazardous waste to minimise room for interpretation and bring legal certainty.

In line with the above, the general objectives highlighted in the Roadmap, i.e. addressing gaps in legislation, providing clarity on definitions and tackling legal, practical and practical problems at the interface of chemical, product and waste legislation that are hindering the circular economy, are all of particular importance to our sector.

We are looking forward to contributing to the Commission's work to prepare policy options addressing the issues and barriers described in the Roadmap.

Feedback file:

[EuroCommerce Comments RoadmapChemicalsProductsWaste 28March.docx](#)