

# **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 : Ann Dierckx
- Email : [adi@cefic.be](mailto:adi@cefic.be)
- Country : Belgium
- Organisation : Cefic
- Headquarter : Belgium
- Register : 64879142323-90
- Size : Medium (< 250 employees)
- Publication : can be published with your personal information

## **Related document: Analysis of the interface between chemicals, products and waste legislation and identification of policy options**

## **Feedback:**

*The European chemical industry supports the transition towards a circular economy as part of a strategy to make Europe more resource efficient. This can be achieved by avoiding unnecessary loss of resources throughout the life-cycle of products and by keeping resources longer in use, after first usage, extending their life.*

*Such thinking driven by environmental and economic reasons already exists today in the chemical industry, which has a long, relevant experience in this field. The chemical industry can contribute to the circular economy in all its facets as evidenced by many examples , e.g. through:*

- *product design, e.g. providing solutions to improve resource efficiency and longer life cycles of products;*
- *production processes, e.g. by setting up loops for processing and re-using chemicals in integrated production systems;*
- *turning waste to chemicals and resources;*
- *using alternative feedstock (e.g. CO<sub>2</sub>);*
- ...

*Cefic has taken note that the Commission identified four problem areas in the roadmap: “(#1) insufficient information about substances of concern in products and waste; (#2) presence of substances of concern in recycled materials and articles made thereof; (#3) uncertainties about how materials can cease to be waste; (#4) difficulties in applying EU waste classification methodologies and impacts on the recyclability of materials.”*

*Cefic agrees that the above warrant further consideration, both in analysis and appropriate measures, and we are ready to play an active role. In addition, we would highlight that further emphasis is needed in investments and developing technology routes and methods (mechanical and chemical recycling, improved sorting techniques, analytical methods, ....) along the recycling chain to improve the uptake of secondary raw materials.*

*Substances in consumer products can sometimes be difficult to track; value chain*

*collaborations will be critical to develop and implement solutions. Any solution should:*

- recognise that individual product waste streams are very different, necessitating different solutions and thus a differentiated approach for each value chain;*
- prioritise waste streams for solution development; taking into account previous Commission studies ;*
- complement and not undermine existing legislation;*
- address how to effectively move from waste to resource efficiency;*
- recognise the high resource efficiency potential of chemical products during the use phase;*
- recognise the vital role of specific substances to achieve desired products properties; the presence of these substances does not necessarily prevents their re-use;*
- encourage recovery into fuels and energy for products and articles that cannot be recycled in a safe and sustainable way.*

*Cefic, together with its members, have analysed the above mentioned four problem areas, and suggest some preliminary ideas to solve them, which we submitted to the Feedback by way of attachment. We are most willing to have further conversations with the Commission and other interested stakeholders to bring these ideas forward.*

**Feedback file:**

[CeficfeedbacktotheRoadmapontheinterfacechemicals\\_products\\_wastelegislation\\_final.pdf](#)