

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

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

## **Feedback:**

*The Landbell group welcomes the initiative of the European Commission to analyse and tackle problems at the interface of chemicals, product and waste legislation. The Landbell group operates take-back schemes for packaging, WEEE and batteries across Europe and provides consulting services to their clients on compliance with chemicals and waste legislation. The Landbell Group supports producers to fulfill their obligations with relevant take-back legislation (on WEEE, batteries and packaging) and chemicals legislation (such as REACH, CLP and RoHS). From our experience with regulatory and administrative frameworks in different European countries, we are familiar with the difficulties that arise from a lack of consistency and enforcement of existing legislation.*

*Besides, the regulatory framework must be adapted to support the recycling flow. One core conflict we see is that today's waste streams still contain substances that are restricted in new products (or will be restricted in future). This hinders the use of recycled materials. Thus, there is an urgent need for an approach that prevents high quantities of material from being shipped to incineration plants and that increases the use of recycled materials. In parallel, we must ensure the elimination of substances of concern in new products and thereby, also in future waste streams.*

*As a stakeholder that operates at the interface of chemicals, products and waste, we would like to give further insights and contribute to solutions to address existing problems. Therefore, we hereby express our interest to be an active part in the upcoming stakeholder meetings and consultations and we are at your disposal for any questions.*

## **Feedback file:**