



FEAD feedback to the Chemicals strategy for sustainability

June 2020

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe **welcomes** the Chemicals Strategy for Sustainability which aims at protecting people and the environment better against hazardous chemicals and at encouraging innovation for the development of safer alternatives.

From a waste management perspective, in order to improve the circular economy which requires more and more ambitious targets in terms of quantity and quality, we would like to stress the following needs:

- **More information**

When treating waste, the operators may face a lack of information about the composition of the waste received. This is particularly critical for hazardous waste. Such information is essential for several reasons: compliance with the acceptance criteria in the facilities and, where applicable, the compliance with legislative requirements such as POP Regulation or Seveso requirements on site, verification of the chemical compatibility to prevent any risk of accident and protection of employees in terms of health and safety.

- **Need for guidance**

Together with the need for more information we call for the creation of a realistic guidance on what could be found in different waste streams and how to treat them in a safe and environmentally sound manner

- **Decrease of the use of Substances of Very High Concern**

This topic is fundamental and in order to improve the quality of recyclates as well as the safety of the workers and the environment we should, as much as possible, get rid of substances of very high concern in the products. If substitutes are unavoidable we then claim for more information on products and on how to remove and treat those substances in a safe and environmentally sound manner.

- **Mandatory eco-design**

We call for a true dismantlability and recyclability of products through mandatory standards for designing products, reducing or phasing out substances of very high concern. A robust eco-design policy will be also a key tool for the prevention of the generation of waste.

- **Enforcement and implementation of EU legislation**

While ambitious targets push for more recycling in terms of quantity, a qualitative approach is also needed, as recyclers are investing in downstream

APOH, Slovakia

BDE, Germany

ESA, UK

FLEA, Luxembourg

HRABRI CISTAC,
Serbia

NORSK INDUSTRI,
Norway

SRI,
Sweden

ARMD, Romania

CAOBH, Czech
Republic

ECEIA, Estonia

FNADE, France

IWMA, Ireland

PASEPPE, Greece

ASEGRE, Spain

DWMA, Netherlands

FISE, Italy

go4circle, Belgium

LASUA, Latvia

PIGO, Poland

VOEB,
Austria

YTP,
Finland

parts of the value chain. This investment will only be made possible by the proper implementation and enforcement of the existing international and European legislation (REACH, RoHS, POPs) at all stages and by all actors, with a specific attention to imported goods.

- **Legacy substances**

Because legacy substances are a barrier to recycling we call for a specific decision-making methodology to support decisions on the recyclability of waste containing substances of concern.

In order to improve the protection of human health and the environment from the risks that can be posed by chemicals, the Commission needs to strike the right balance between recycling/recovery policy as proposed by the new Circular Economy Action Plan and the aims of chemicals/products legislation.