

FEAD Reply to Roadmap on the Revision of EU legislation on hazard classification, labelling and packaging of chemicals (CLP)

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FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe welcomes the **Revision of EU legislation on hazard classification, labelling and packaging of chemicals** which aims at protecting people and the environment better against hazardous chemicals and at encouraging innovation for the development of safer alternatives.

In the Green Deal, the European Commission targets two essential goals in the handling of substances and materials known as “non-toxic environment” and “circular economy”. There are numerous interfaces in product, waste and chemicals legislation in these two areas.

The CLP Regulation does not distinguish between substances coming from virgin material or those from recovered material. The same obligations of notification, labelling and packaging apply from the moment a substance ceases to be ‘waste’ until it becomes waste again.

The main challenge when a new cycle starts is to ensure that a hazardous chemical present in recovered materials is identified as such.

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:

Information flow

Information is needed by waste management companies on the hazardous properties of the substances contained. Moreover, if waste is intended to be recycled into secondary raw materials, a holistic view is needed. However, this is obstructed by a loss of information along the path from chemical to product to waste.

With regard to post-consumer waste, in most cases composition can only be determined by means of extensive analyses and can vary considerably from batch to batch (e.g. mixtures of waste wood, mixed construction waste). Since such extensive analyses are very costly, the correct classification and subsequent treatment of such waste can mostly be achieved by collecting all available information.

- **The transfer of information from waste producer to waste processor is indispensable for correct classification in accordance with the EWC and further treatment of the waste. Even without this information, existing waste legislation requires classification according to the (assumed) substance-inherent hazard characteristics.**

Conclusions

The new Circular Economy Action Plan set ambitious recycling targets, and to this extent FEAD asks the Commission to strike the right balance between these ambitious recycling targets and the phasing out of hazardous substances.