

Interphase products and waste ...& Circular Economy

19a Virtual Conference on Product Safety

17 November 2020

Rossella Demi
Chemistry Unit
Prioritisation and Integration Directorate



Interphase products and waste

- SCIP database of articles containing SVHCs on the Candidate List
- The Circular Economy Action Plan - one of the main blocks of the European Green Deal
- Links to ECHA activities
- The main challenges

EU action plan for
the **Circular
Economy**



Legal basis:
**Waste Framework Directive
(WFD)**

**Establish and maintain a
database**

The SCIP logo, consisting of the letters 'SCIP' in a bold, sans-serif font, with a small circular icon containing a stylized 'S' and 'C' to the left.

for info communicated down in
the supply chain on **substances
in articles**

Enabler for a circular economy

- All materials around us are a mixture of different chemicals
- We need “clean” material cycles, avoiding hazardous substances that hamper recycling, in order to improve the uptake of and trust in recycled materials
- The SCIP database will increase the information on the presence of hazardous chemicals in articles and products

SCIP: **S**ubstances of **C**oncern **I**n articles, as such or in complex objects (**P**roducts)

Reduce the content of hazardous substances in materials and products, including recycled materials

Push for **substitution** of substances of concern and **prevention** of (hazardous) waste generation



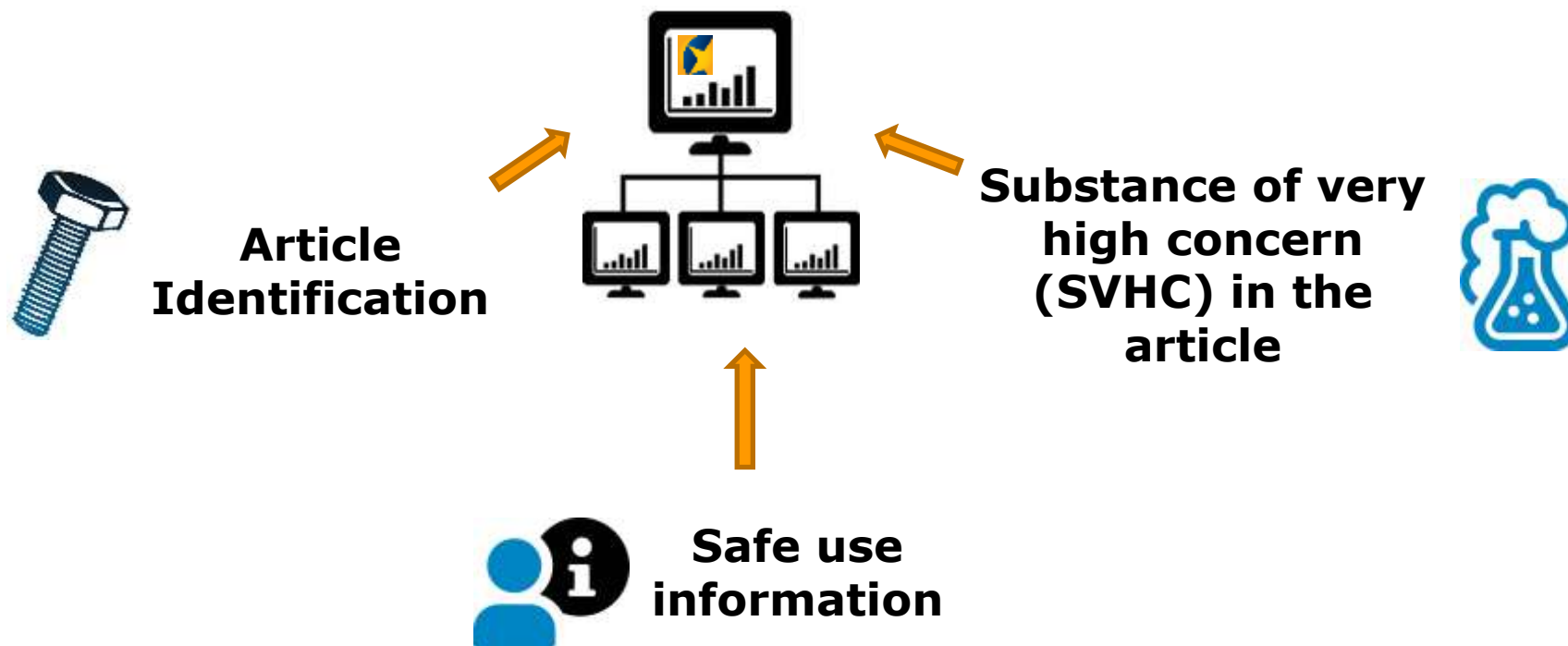
Contributing to a more circular economy: improve waste treatment operations

Increase authorities' information basis on substances in articles

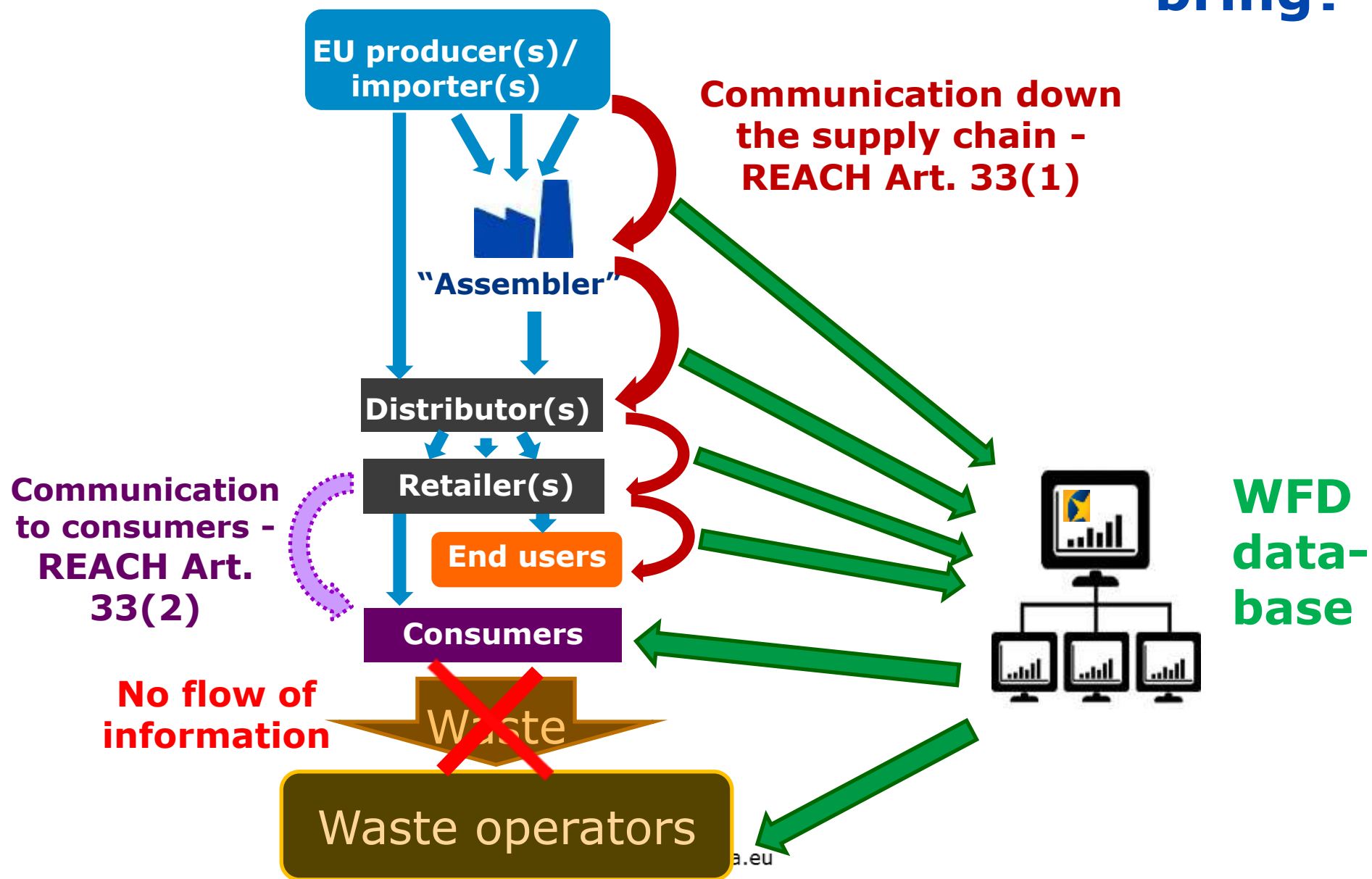


Need to
submit info
to ECHA

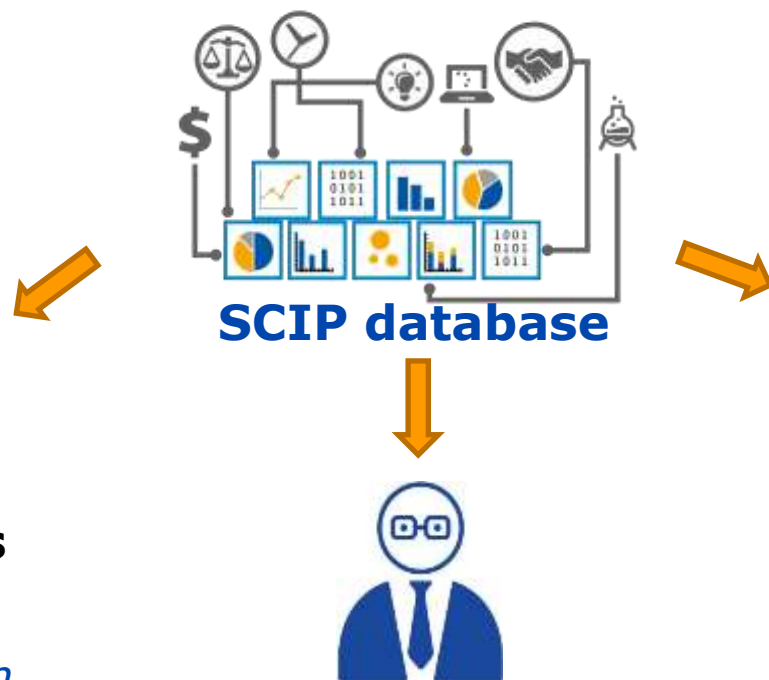
Any supplier of **articles containing** a **substance of very high concern** (SVHC) on the Candidate List above 0.1% w/w



What will the SCIP database bring?



Target audiences



Waste operators

- Available info to*
- ✓ *drive waste stream decisions*
 - ✓ *support compliant re-use*
 - ✓ *increase recycled materials*

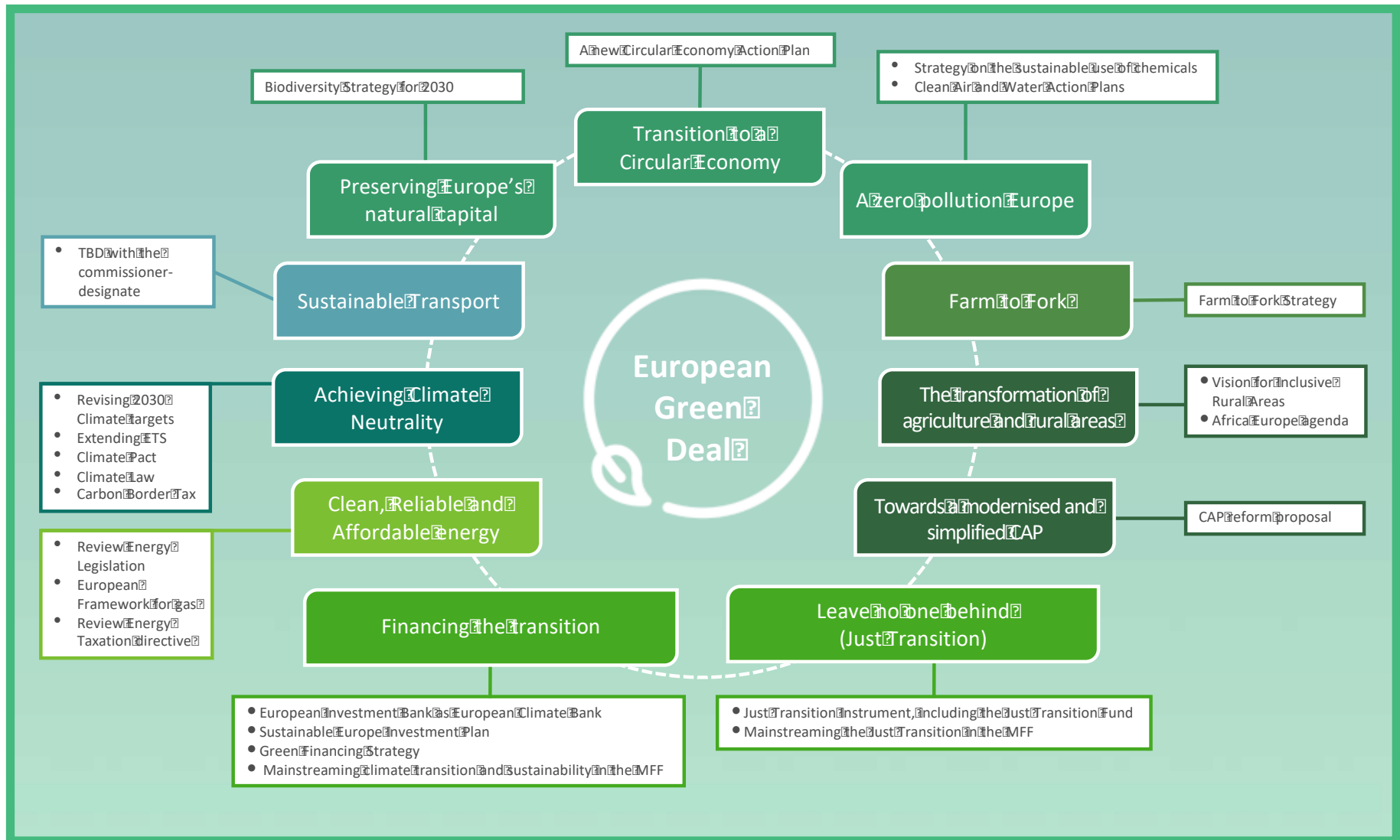
Consumers and other interested parties

- ✓ *Empower informed choices*
- ✓ *Improve targeted disposal*

Authorities

- ✓ *SVHC monitoring to address regulatory actions*
- ✓ *Available info to support (waste) policy decisions*
- ✓ *Support enforcement*

The European Green Deal



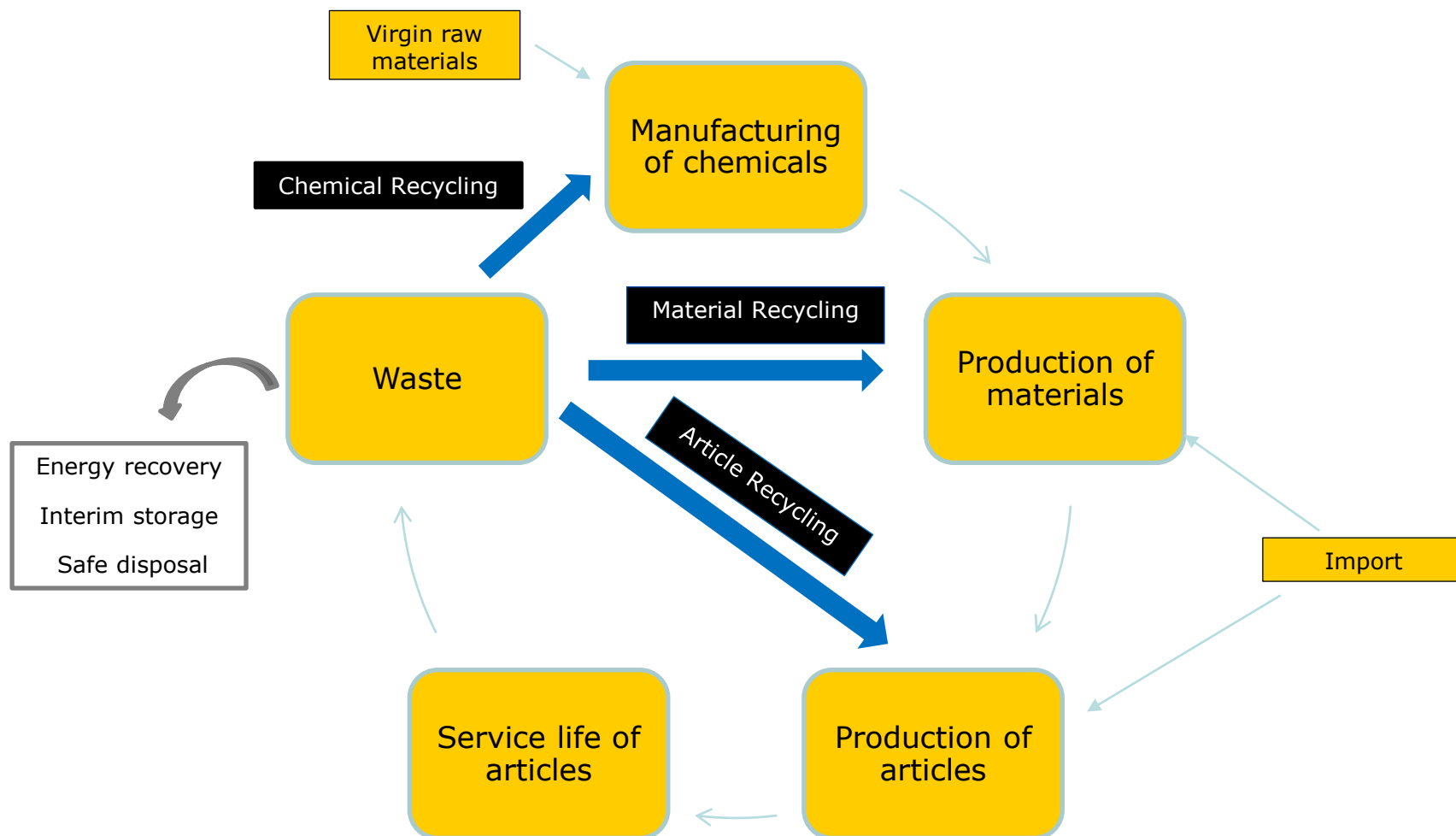
Content of Action Plan

- A sustainable product policy framework
 - Designing sustainable products
 - Ecodesign, EU ecolabel and GPP
 - European Data Space for smart circular applications
 - Empowering consumers and public buyers
 - The right to repair
 - Circularity in production processes
 - Linking to IED (industrial emissions directive)
 - Relation with bio-based economy

Content of Action Plan

- Less waste, more value
 - Enhanced waste policy in support of waste prevention and circularity
 - Enhancing circularity in a toxic-free environment
 - REACH encourages safe-by-design
 - Non-toxic cycles
 - Will be worked out in the Chemicals Strategy for Sustainability
- Creating a well-functioning EU market for secondary raw materials
 - Harmonising end-of-waste criteria and by-product criteria
 - REACH authorisation is not covering imported articles
 - Enforcement at our borders
- Addressing waste exports from the EU

Circular economy & chemicals



Chemicals Legal Framework in the context of circular economy

- *REACH/CLP implementation*
 - **Information on chemistry, composition, hazards, uses & exposure**
 - **Processes & supporting substitution**
 - **Information on chemicals in the supply chains**
- *Chemicals-products-waste interface*
 - **Insufficient information on substances**
 - **Presence of substances in recycled materials**
 - **Uncertainties on end-of-waste / classification of waste**
- *Interface of REACH/CLP with other legislation*
 - **contribution to circular economy as a factor to be considered**

Links to ECHA activities

- Substance identity and SIP
- Authorisation and restriction processes
- Supply chain communication including SCIP database
- CSR/ES roadmap and ENES community
- Socio-economic analysis
- Enforcement

Risk Management Measures (Waste Stage)

According to Article 3(37) Exposure Scenarios (ES) refer to control of risk during the entire life-cycle of the substance.

This includes considerations related to the waste stage of substances - in **Annex I paragraph 5.2.2** the life-cycle is explicitly said to cover the waste stage.

In addition, **Annex I paragraph 5.1.1** makes it clear that the risk management measures in an ES should cover **Waste Management measures to reduce or avoid exposure during waste disposal and/or recycling.**

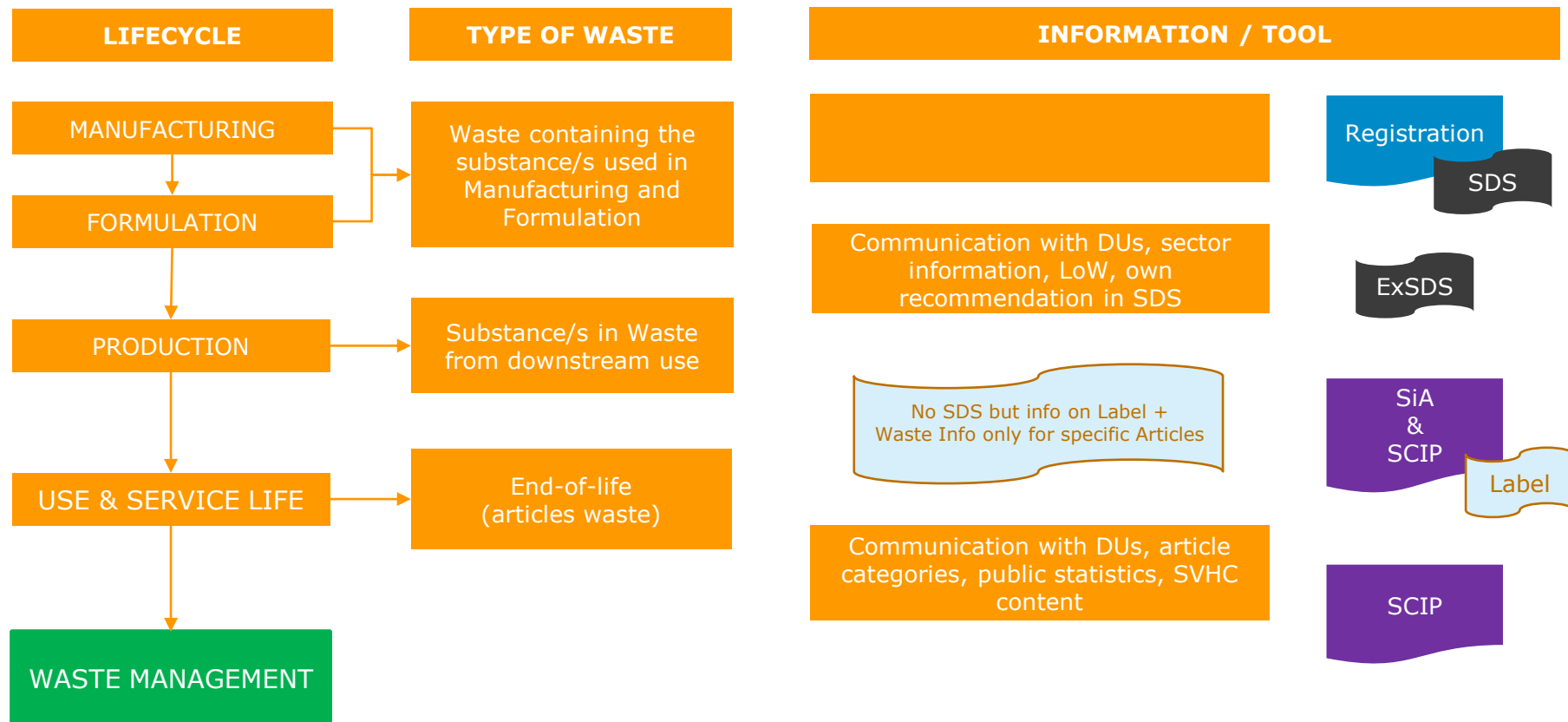
The under REACH with regard to the waste life stage can be summarised as follows:

Registrants to document in the Registration Dossier information on:

- The amount of waste resulting from manufacture of the substance
- The identified uses and from use in articles,
- The composition of the waste streams.
- Waste to be identified with European Waste Catalogue codes.
- For dangerous substances > 10 t per year , **CSA to cover the waste life-stages** resulting from manufacture and identified uses, **including exposure estimation and risk control measures** to be communicated downstream with the **ES** in the **ExSDS**.

*Article 2 (2) of REACH provides that "waste as defined in Directive 2006/12/EC of the European Parliament and of the Council is not a substance, mixture or article within the meaning of Article 3 of this Regulation." Therefore, REACH requirements for substances, mixtures and articles do not apply to waste, and waste operations are not downstream uses under REACH. Risks in waste operations are to be primarily controlled based on requirements set by waste legislation. Nevertheless manufacturers and importers of substances, downstream users and eventually recipients of articles **have a number of duties under REACH related to substances in waste**. This is to complement waste related requirements with substance-specific measures to control risk, if needed.*

Risk Management Measures (Waste Stage)



Guidance on information requirements and chemical safety assessment, Chapter R.18.2-5

Considerations

The role of a functioning Supply Chain Communication system is crucial in achieving toxic-free cycles

The purpose of SCIP is to have an impact at both ends, from **cradle to grave**:

- Empowering better Waste Management operations at the end-of pipe stage through the individuation of SVHC in Waste Streams
- Pushing for the substitution of SVHC at the Production stage of Articles.

Supply Chain Communication enables to track Substances at all levels, with particular focus on Articles (Waste-to-be).

- End of Waste Criteria are impacted by the generation of the information above

ECHA role and contribution

ECHA ready to help the EU achieve its ambitions for safe and sustainable chemicals:

- Interpretation of what are substances of concern
- Harmonisation of classification criteria for CLP and waste
- Understanding of end-of-waste criteria from REACH perspective
- Feasibility of alternatives and what time is needed to get to non-toxic cycles
- The international dimension
 - Europe is not an isolated island, articles come into the EU

ECHA role and contribution

ECHA ready to help the EU achieve its ambitions for safe and sustainable chemicals:

- Circular economy and chemical recycling
 - Chemolysis, pyrolysis, fluid catalytic cracking, hydrogen technologies, catalytic pressureless depolymerisation, gasification
- Tracking of substances in the supply chain
- Extended producer responsibility

ECHA role and contribution

ECHA can particularly contribute in three areas: collecting, publishing and evaluating data on chemicals to stimulate innovation towards safer alternatives; ensuring that laws are implemented more efficiently and consistently; and speeding up chemicals risk management in the EU

<https://echa.europa.eu/it/-/echa-ready-to-help-the-eu-achieve-its-ambitions-for-safe-and-sustainable-chemicals>

Any questions?



Thank you!

Subscribe to our news at
echa.europa.eu/subscribe

Follow us on Twitter
[@EU_ECHA](https://twitter.com/EU_ECHA)

Follow us on Facebook
[Facebook.com/EUECHA](https://facebook.com/EUECHA)

