

Answer to: [Circular economy – new action plan to increase recycling and reuse of products in the EU](#)

Feedback:

Stockholm University Baltic Sea Centre agrees with the basis for an EU intervention. Ensuring policy coherence, certainty and harmonisation of rules in the field of product, consumer and chemicals legislation need to take place at European level.

The roadmap states that *“insufficient information regarding the presence or not of substances of concern in products and waste often hampers their recycling and uptake”*, and we will focus our comments on this aspect.

Information on the chemical composition of articles is scarce, making it difficult to understand which chemicals that may be released from products to the environment. There is an urgent need for legal incentives to increase the availability of information on chemicals in articles for authorities, researchers, and consumers. Here is why and how:

- Many substances that are banned or identified as being SVHCs, continue to circulate in society via recycled materials. Currently the likelihood of identified hazardous substances occurring in recycled materials is high. Yet it is not often known in which products these chemicals have originally been used. Providing information on chemical content to waste handling companies would make it possible to exclude materials or articles that contain hazardous substances from the recycling stream. This however requires that the chemical content of the materials and finished articles is known in the first place, and that this information is retained throughout the full product life cycle. Legislation to ensure this information transfer and conservation is currently lacking.
- If manufacturers and retailers themselves had complete information on chemical content, they would be better prepared for new chemical regulations and it would help them to proactively phase out substances from their supply chains that are likely to be listed as new SVHCs.
- Voluntary actions to phase out substances that are not yet regulated at the EU level require knowledge about the presence of all chemicals in articles, i.e. not just those currently regulated. REACH Article 33 only gives downstream users and consumers right to information regarding SVHCs. Thus, companies and consumers that want to avoid other potentially hazardous chemicals have no possibility to do so.
- Only a minor fraction of all chemicals on the European market has been thoroughly risk assessed. Where and how chemicals are emitted are important pieces of information needed to identify which chemicals to prioritise in risk assessments and to develop cost-efficient measures to reduce emissions of already identified hazardous substances. The list of substances to monitor needs constant updates to include all substances that contribute significantly to any negative impact arising from the current chemical contamination of the environment.

Our policy recommendations:

- Continue the development of harmonised tools across sectors to track chemical composition of products throughout the supply chain, including imported and recycled articles.

- Establish a system to disclose chemical content in articles to authorities, researchers, and the general public in order to help identification of new environmental contaminants and to fulfil the consumers' right-to-know.
- Introduce labelling of articles containing substances that are identified by the EU as being SVHCs in order to enable consumers to make informed choices.
- Legally oblige suppliers and companies to grant authorities responsible for the management of chemicals (e.g. ECHA) full access to chemical composition data of articles which, in the long run, will assist the circular economy and reduce emissions of hazardous chemicals to the environment.