



“Substances of concern in material loops: towards safe recycling”

**“A futureproof EU Waste Framework Directive” workshop
15:15 – 16:30 Breakout session**

The Core Challenge:

Our primary goal is to pave the way for a circular economy where exposure to Substances of Concern for both humans and the environment is minimized to acceptable levels.

Proactive Design Approaches:

It is vital that we learn from past errors where product composition was not adequately considered at the design stage. Thoughtful product development can avert many future problems, and the new ecodesign regulation is certainly a step forward in this direction.

Dealing with Legacy Waste:

We will continue to encounter waste products containing hazardous substances for many years. A critical question emerges: How can we maximize the reuse of these waste materials as raw materials within a safe circular economy, especially considering these substances of concern?

Information Flow Bottlenecks:

A significant obstacle is the premature halt in the flow of necessary information about hazardous substances. The 2018 revision of the Waste Framework Directive (WFD) attempted to address this through Article 9, which requires suppliers to report and register in the SCIP database any articles on the market with more than 0.1% SVHC. With nearly 14 million entries currently in the database, we must consider:

Q: How can we make SCIP information more actionable for waste handlers?

Q: Is it enough to include only information about SVHCs, or should this be extended to all substances of concern?

Q: Should the WFD be modified to require accurate reporting of substance concentrations, and should it include a mandatory investigation by producers into reducing SVHC concentrations?

Legal Framework Discrepancies:

Currently, the legal frameworks governing waste and those for substances and products differ, complicating tracking and applying inconsistent standards across the board. This raises additional questions:

Q: Should recycled materials be required to meet the exact standards as virgin raw materials, or are exceptions justified in certain cases?

Q: When considering exceptions, what principles should guide the cost-benefit analysis, and should these principles be explicitly included in the WFD?

Innovative Solutions for Waste Management:

A potential solution is to advance waste reprocessing technologies and construct facilities dedicated to separating hazardous materials from others.

Q: We need to discuss whether the responsibility for reprocessing certain key waste streams should be assigned to the producers under the extended producer responsibility framework. Which specific streams should be considered, and how can this principle be integrated into the legislative framework?