

## **BLOG: Circular Economy – Opportunities and challenges for chemicals regulation**

The objectives of chemicals legislation include in particular ensuring a high level of protection for health and environment from the exposure to hazardous chemicals. The risks from the use of hazardous substances within the EU will successively decrease as REACH and other chemicals legislation is being implemented. Nevertheless, the problem of hazardous substances in the material cycles will remain for a near future. The reasons for this is 1) that these substances are included in existing articles and materials that may have life-times of several years or even decades, and 2) that the use of hazardous chemicals in imported articles (i.e. a significant part of articles used in the EU) is more difficult to systematically regulate.

Therefore, if the objectives of a circular economy are to be met, it is key to address these issues, as material recycling will be of ever-increasing importance to provide feedstock for the manufacturing industry.

The chemicals legislation, the main elements being Regulation (EC) 1907/2006 on Registration, Evaluation and Authorisation of Chemicals (the REACH Regulation) and Regulation (EC) 1272/2008 (the Classification, Labelling and Packaging Regulation – CLP) regulate chemical substances, as such, in mixtures and in so-called articles\* with the aim to avoid unacceptable risks from the chemical occurring at any stage of its use, including disposal, recovery or recycling. In doing so, the chemicals legislation either explicitly or implicitly puts pressures on the use of hazardous substances, by reducing risks or by substitution of particularly hazardous substances by less hazardous substances. Chemicals legislation thereby affects the material design, the product design, the manufacture, use and ultimately the waste, disposal and recycling of the material.

Synergies between waste and chemicals legislation aiming for a circular economy can be obtained by

1. assessing and if necessary adjusting how the pressures from the chemicals legislation on the materials support or hinder obtaining recycled materials exiting the waste phase that are suitable for re-entering the product phase; and by
2. assessing and if necessary adjusting how the waste legislation enables recycled materials to exit the waste phase whilst ensuring that the material can meet the requirements of the chemicals legislation.



**Bjørn Hansen**  
**Head of Unit**  
**European Commission**

*The Panel about Circular Economy will take place on Thursday 26th May 2016 in Helsinki Chemicals Forum. You are also welcome to join the conversation on Twitter @ChemicalsForum.*

\* Articles are products where the shape is more important than the chemical composition. If the chemical composition is more important than its shape, the product remains a mixture.