

Circular Economy

Policy Making for Traceability of Chemicals along Value Chains

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Chemicals Traceability

“The **chemical composition** of products largely determines their functionalities and impacts, as well as the possibility for their reuse or for recovery once they become waste.” (Recital 31 ESPR)

Knowing the chemicals in products is a precondition...

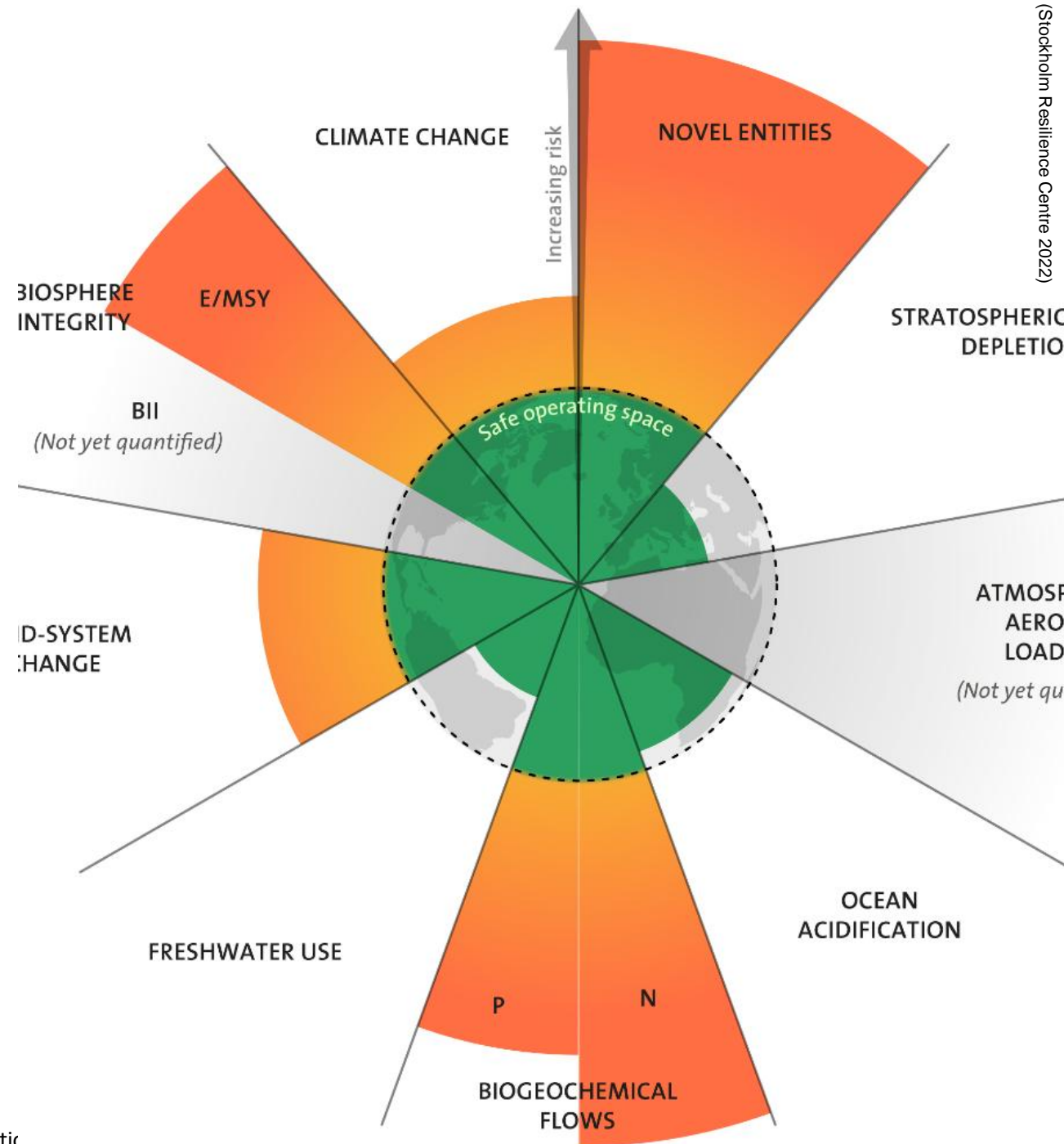
- For the “Circular Economy”, to rescue a competitive single market (Letta, Draghi...)
- For companies placing products on the market

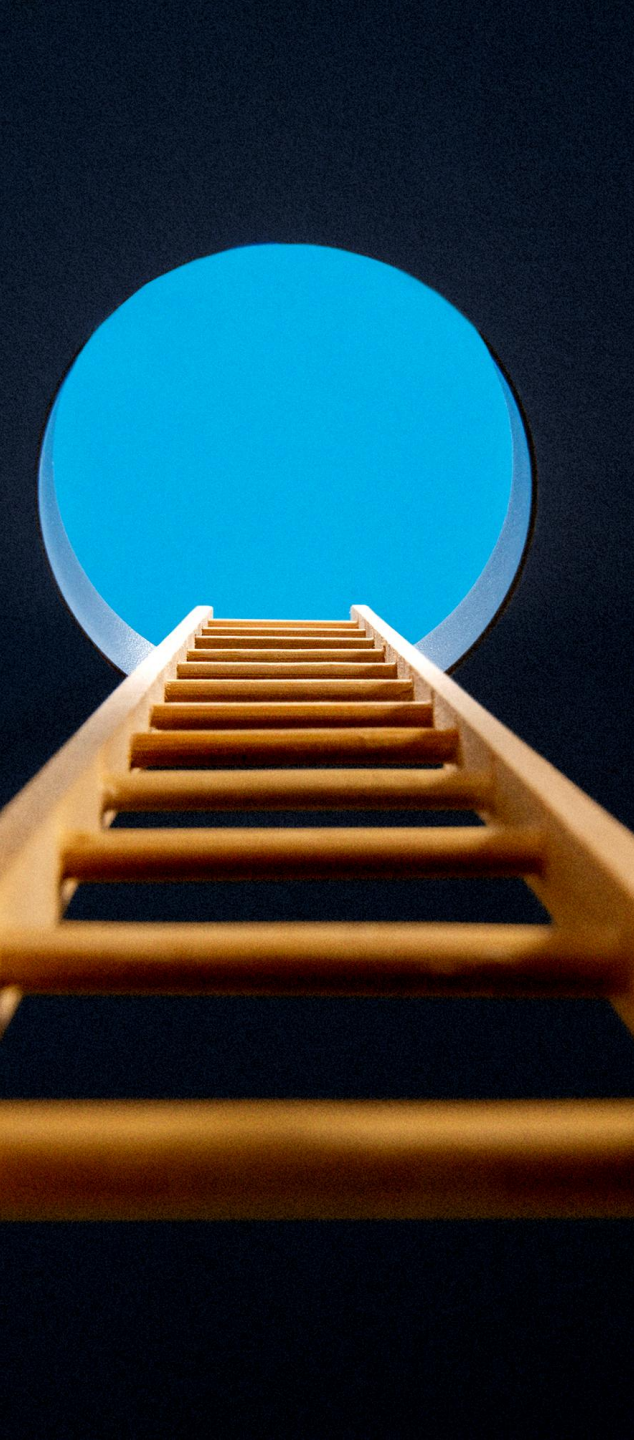
But we are not there – yet

See May 2024 note by Civil Society



Classificati





What we like

- Recent progress in REACH restrictions (CMRs textiles, based on GRA; grouping approach and all uses in uPFAS)
- CSS goal to minimise or at least identify SoC in consumer products and regulation prepared/adopted in that regard, notably ESPR
 - Default tracking of SoCs: Dynamic reporting needed for all SoCs
 - Possibility to restrict chemicals (“make sustainable products the norm”)
 - Delegated act on Chemicals
- 2020 CEAP: “co-operate with industry to progressively develop harmonised systems to track and manage information on substances” – *when will this be delivered??*
- Initiatives like ECHT, Proactive Alliance (incl. Cefic; support FMD)
- Chemical Industry’s **Transition Pathway**: „Suggest improvements on transparency – and ending restrictions on transparency – in the use of ‘substances of concern’”

What we are missing

- Lack of horizontal EU traceability strategy
 - identifies where traceability is needed to achieve policy goals (= triple crises, competitiveness....)
 - action plan how to get there (by enacting new laws, provide capacity building etc.)
 - establish “report once” principle → thereby cutting-down reporting burden
- **Clean Industrial Deal**
- Lack of legal tools obliging the chemical sector to provide composition data allowing customers to be and remain compliant
- Lack of ambition and tools for enforcement (see e.g. SVHCs, marketplaces/direct imports)



Thank you!

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