

Response to Roadmap

Brussels, 19th June 2020

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Eurima response to the Chemicals Strategy for Sustainability Roadmap

Eurima welcomes the Commission's intention to protect the citizens and the environment and combine better health and environmental protection by simplifying and strengthening the legal framework. We also see the value that this Strategy could bring to the other EU priorities under the European Green Deal, such as circular economy ambition, which European Insulation Manufacturers Association (Eurima) is strongly committed to. The Chemical Strategy can indeed help progress on issues linked to the Interface between chemicals, product and waste, identify the overlaps and gaps and take action.

Eurima has identified some work streams and actions that should be taken into account for the Chemicals Strategy for Sustainability, which some of them already highlighted in the 2018 consultation of the interface between Chemicals, Products and Waste that would improve circularity in the context of construction sector and the interlinks with the Chemical Products Regulations:

- Improve exchange between REACH, Product Standards and Eco-design once a change in a classification of a substance is implemented, in order to ensure the correct, up to date and alignment of information per substance. Today, the manufacturers are responsible for the cross-check between the legislations while this could be solved with a common platform exchange between the relevant product legislations and REACH.
- Avoid having discrepancy of methods between REACH and CPR for mineral wool products on their chemical emissions. Today, the REACH regulation restriction proposes a test method for the assessment of formaldehyde emission that is not in line with the current CPR regulation that defines another test method for the VOC emission. The gap between the two methodologies required creates additional administrative effort and high costs to the manufacturers in order to assess the emissions of their products. In order to fill this gap, a better alignment of scope and requirements between the two pieces of legislation is essential for construction products to avoid double work but to ensure the best possible protection of consumers and the environment in Europe.
- The imported goods should follow the same rules as the products produced in Europe. If information is missing for those products, it will continue to hamper the recycling. The management of the goods introduced in the EU market must follow the same rules as the substances and mixtures imported into the EEA according to REACH Regulation e.g.: Article 5 of REACH Regulation: No data, no market: "Substances on their own, in mixture or in articles shall not be manufactured in the Community or placed on the market unless they have been registered in accordance with the relevant and provisions of this Title where this is required "
- In parallel, we underline the importance of developing an EU-wide open standard for information on the content of construction products to encourage the use of non-toxic and recyclable materials. Transparency on the content of products is an ongoing trend in many industries. It should provide the necessary information to the different players in the value chain in order to

manage their operations with a knowledge level to improve the risk management on health and environment. It should give the opportunity to have a good understanding of the requirements for their waste management processes in function of the products that they want to put on the market. It is important that the method to declare the content of products as put on the market is a harmonised method throughout Europe. The information which is provided in a harmonised way needs to be stored in such a way that it is easy to know what to do when the product reaches its end of life. In the case of buildings (and the construction products contained in the building), a good solution could be to integrate the information into materials passports as part of building passports. The information should be included in building passports and still be accessible when the building and/or products reach their end-of-life (after around 50 years for construction products), through developments in digitalisation (e.g. BIM), in order to facilitate dismantling, reuse and recycling. Eurima has initiated work on a voluntary EU construction product approach to promote such principles.

- The need to boost the recycling of building materials from renovation and deconstruction projects. The sorting of construction waste from deconstruction/demolition sites will need to become mandatory and (non-weight) targets for the recycling of construction products should be set. The reuse and recycling must become more (financially) attractive than landfilling. Currently, construction materials still end up in landfills, as landfilling is often cheaper than recycling these materials;
- A clearer regulatory environment where the focus of the requirements (for recycling and substances of concern) is on the requirements for the products that are put on the market (both with and without recycled content) and not on the incoming secondary raw materials, would facilitate the circular economy. The discussion around waste and products should be taken very carefully in order to refer to the realities of the physical streams. Supported by a risk-assessment, recycling should be a valid option, if hazardous waste can be reprocessed into a non-hazardous secondary raw material that can then be used in a safe manner to manufacture new products. Today, when a renovation takes place some components are sometimes by default classified as hazardous under the Waste Framework Directive and subject to strict provisions. This creates bottlenecks in the chain towards recycling of this waste as secondary raw materials into new materials. For example, some glass wool products are considered as hazardous waste while they can be processed (i.e. melted) into non-hazardous secondary raw materials (glass cullet) to be used to manufacture new non-hazardous glass wool products . Therefore, a dedicated legal framework to foster the recycling of hazardous substances into non-hazardous products should be put in place.

We remain at your disposal for any further exchange on the points mentioned above and we look forward to work with the European Commission and other policymakers & stakeholders on the elements of the Chemicals Strategy for Sustainability.