



## WFD ECHA Database and the Feasibility Study on the Use of Comprehensive Tools to Manage Information Flows from Product Supply Chains to Waste

In the context of its work on the chemicals-products-waste interface, the EU Commission launched a feasibility study on the use of tools to manage information flows along product supply chains and in the waste sector. ECHA should play a major role in ensuring traceability along the waste management chain and in guaranteeing the production of high quality secondary raw materials, both of which are major goals for FEAD, the European Federation of Waste Management and Environmental Services. **Creating certainty and reliability is key in reintroducing a greater quantity of safe recycled materials into the manufacturing cycle.**

### INFORMATION DEFICIT

One of the most **important issues currently affecting the waste management industry is an information deficit**. The level of information concerning the presence of substances of very high concern in products is very different depending on the waste flows, which are by their nature heterogeneous. It is therefore crucial that information is provided and efficiently shared with all the actors along the different stages of the value chain. Product manufacturers who know the content of the substances they incorporate in their products should inform recyclers.

Such information is essential for **safety**. We need to comply with the acceptance criteria in the facilities where applicable to protect our employees against any risks, and ensure health and safety along the waste management chain and in the environment.

Additionally, the **quality** of recovered or recycled materials is highly dependent on the knowledge we possess of the components present in the various waste streams.

Lastly, in order for us to comply with the requirements on **traceability**; comprehensive information is essential.

### PRIVATE WASTE MANAGEMENT'S NEEDS

FEAD members welcome the information the database may provide as one of the main users of the WFD ECHA database.

In order to deal with a specific waste stream, waste management operators need:

- **Reliable information on each waste stream;**
- **Clear and simple information regarding the presence or absence of substances of concern; ECHA should avoid the inclusion of too much detail in order to simplify the treatment of information by waste management operators through a risk assessment;**
- **Certainty that the legal thresholds, if any apply, are respected.**

We require access to all relevant information from manufacturers in order to guarantee the proper treatment of waste, the traceability of the substances in the waste chain, and high quality recycling or recovery. Under REACH (Regulation (EC) No. 1907/2006), producers have been obliged to provide information on substances of concern in the articles they produce.

Therefore, communication between producers and waste operators has to be established if not already existing or improved when needed.

A complete information flow is attainable by:

- **When insufficient, improving cooperation between manufacturers and the waste management sector in order to make more information available for the management of waste.**
- **Supporting the use of digital solutions** for improved information flows, bearing in mind that the development of information flows on SRMs should not lead to more demanding obligations than there are for virgin materials.
- **Providing a clear and simple methodology to indicate the presence of substances of concern in a waste stream.**

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*FEAD, the European Federation for Waste Management and Environmental Services, represents the private waste and resource management industry across Europe. FEAD's members are national waste management associations covering 19 Member States, Norway and Serbia.*

*FEAD's members represent about 3,000 companies with activities in all forms of waste management. Our companies have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion. These companies employ over 320,000 people who operate around 2,400 recycling and sorting centres, 1,100 composting sites, 260 waste-to-energy plants and 900 controlled landfills.*

*They enable the transition to a circular economy by producing resources which can be re-injected in the economy and by supplying energy. Our companies add value through innovative and cost-efficient collection, sorting, and recycling of secondary raw materials. As a result, they play a crucial role in achieving the best economic and environmental outcomes.*