Re: Support the Motion for Resolution – Options to address the interface between chemical, product and waste legislation

Dear Member of the European Parliament,

On 13 September, you will vote on the Motion for Resolution – Options to address the interface between chemical, product and waste legislation (2018/2589(RSP)) prepared by the ENVI Committee. If adopted, the Resolution would signal to the European Commission, to the EU Member States, and to European citizens that the European Parliament champions a sustainable circular economy that benefits consumers. On behalf of BEUC, The European Consumer Organisation, I therefore strongly urge you to support the Resolution.

A well-designed circular economy will offer many benefits for consumers, such as more durable consumer goods and novel services. But a circular economy also presents new challenges for consumer safety. Many of today’s products contain chemicals that were legal when first manufactured but are now either restricted or banned. Increased materials recycling could give these chemicals a second lease on life in consumers’ homes.

A successful circular economy can only be achieved if consumers are confident that secondary raw materials are safe. A scandal, such as a toxic substance recycled into children’s toys, could do tremendous damage to consumer confidence in the safety of recirculated materials. From a consumer perspective, it is therefore paramount that the EU develops an ambitious framework that prevents toxic chemicals from being reinjected into the economy.¹

We agree, as emphasised by the Resolution, that improved transparency on chemicals of concern in consumer goods is key to establish consumer trust in the safety of secondary raw materials. We further share the concern expressed in the Resolution that robust protections against chemicals of concern are missing for many consumer products. Before closing the loop on a circular economy, the EU needs to close the regulatory gaps that could afford chemicals of concern a second lease of life in consumers’ homes.

As the EU’s transition to a circular economy gains momentum, fixing the governance of chemicals in consumer products must as emphasised by the Resolution remain a priority. The choices we make today, to promote and design a circular economy, thus have direct implications for the lives of millions of consumers across Europe. We trust that you will put their health first and support the ENVI Committee’s Motion for Resolution.

Yours sincerely,

Pelle Moos
Team leader, Safety and Health

¹ For our detailed recommendations, see BEUC, How to Detoxify the Circular Economy, July 2017. Available at: https://www.beuc.eu/publications/beuc-x-2017-084_how_to_detoxify_the_circular_economy.pdf