Circular Economy & Chemicals
CHEM Trust position

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“Closing the Loop”
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About CHEM Trust

- A charity working at UK, EU & Global levels to protect humans & wildlife from harmful chemicals
- Working with scientists, technical processes and decision makers, in partnership with other civil society groups
- Focus on identification of, and action on, endocrine disrupting chemicals
- See our blog & twitter for more: [www.chemtrust.org.uk](http://www.chemtrust.org.uk)
1. In assessing safety of chemical use in a product, assume 100% recycling, i.e. a fully circular economy
   - also make conservative assumptions on potential use of recycled materials (e.g. in food packaging)

2. Chemical assessment should be rapid & future-focussed
   - Need faster assessment, restriction, authorisation processes
   - Companies must avoid moving from one problem chemical to another in a group; e.g. use ChemSec SIN list and SINmilarity tool
     - Chemicals get more toxic, new exposures emerge, we are always dealing with ‘currently estimated toxicity’; see EEA’s “Late Lessons from Early Warnings” [6]

3. Better availability of information on hazardous chemicals in all articles, and labelling if any hazardous materials are permitted to re-enter the economy

4. Some materials should be removed from the loop:
Don’t recycle some materials

• Three destinations for a waste containing hazardous chemicals:
  – (1) Landfill or (2) Incineration
  – (3) Our homes, workplace and living environment
• Shouldn’t assume recycling always best option when waste contains hazardous chemicals
  – Balance value of resource vs concern re hazard, e.g. BPA in thermal paper
• Landfill shouldn’t be dismissed
  – May be the safest place for a material containing hazardous chemicals
    • In case of plastics, analysis shows if not recyclable then landfill preferable to incineration for climate reasons, under typical Swedish/EU conditions (Eriksson & Finnveden, Energy & Environmental Science, 2009.) NB: Doesn’t include carbon capture & storage role of landfill.
• Major risk of scandal, loss of confidence in recycled products
  – Once ‘not waste’, may end up anywhere – e.g. plastic pipes being used as a toy in a kindergarten
  – Already bad examples out there, don’t want to create a loss of confidence
Summary

• Assume 100% circularity
• Faster assessment and regulation, future-focused approach
• Information on hazardous chemicals in articles, clear labelling \textit{if} any hazardous materials are permitted to re-enter the economy
• Don’t recycle some materials
• \textbf{Big risk of loss of confidence if EU gets it wrong}
• More detailed presentation on this subject at: