



European
Automobile
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Association

TO: Mr Carlo Pettinelli
Director
DG-GROW
European Commission
1049 Brussels

Mr Kestutis Sadauskas
Director
DG-ENV
European Commission
1049 Brussels

Brussels, 22nd February 2019

Subject: Development of ECHA database based upon the revised Waste Framework Directive

Dear Mr Pettinelli and Mr Sadauskas,

The Circular Economy (CE) strategy and its related measures, such as the recent European Commission communication on the interface between chemicals, products and waste, is an important initiative, for both society and industry. Its ultimate aim, the sustainable use of resources along the entire product lifecycle, is actively supported by the ACEA members.

For example, the automotive sector owns one of the most advanced and comprehensive systems to globally collect and manage information about substances in articles. Since the International Materials Data System (IMDS) was launched about two decades ago, our sector has invested not just around 10 billion Euro into development and data collection, but also thousands of hours to train the complex and global supply chain. Containing now close to 100 million datasets, our database was developed with global product compliance in mind, and became an essential element of our industry's quality, safety and development processes.

With this unique experience in mind, we would like to express our deep concerns about the new database that ECHA has started to develop based on Art. 9 of the revised Waste Framework Directive "WFD" ((EU) 2018/851), and in particular on ECHA's related project proposals which go far beyond the legal requirement, and which will partly duplicate and thus endanger our industry's efforts, putting our global product compliance at risk.

In this context, we would like to highlight that ACEA is respecting the overarching goals for improvements in future prevention of waste. Concerning the database, we would like to contribute in finding a pragmatic and effective instrument.

For our industry this new parallel database however would inevitably mean duplications of work streams and extra costs and would finally endanger the well-established data exchange



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collaboration between vehicle manufacturers and their global suppliers. **For this reason, we call on the Commission to make sure that end product manufacturers can, on behalf of their supply chain, provide relevant and already available data into the WFD DB.**

Based on our broad experience, we strongly believe that an IT project that is so far unique in size and complexity in Europe needs to be carefully evaluated. To avoid premature and possibly misleading decisions and in order to make the WFD DB setup workable for industry, useful for the recipients of information and enforceable by authorities, we would like to recommend to:

Postpone all related developments until the EC Feasibility Study "on the use of comprehensive tools to manage information flows from product supply chains to waste" is finalised. Although this may result in an extension of the timeline towards implementation, the study outcome can help to properly address all the identified concerns and to define the real data needs, in particular of waste operators. This would also address the fact that the political decision to implement the DB has undergone neither an impact assessment nor a feasibility analysis.

ACEA is furthermore supporting an approach for different and effective solutions tailored to the specific requirements and situation of each individual industry sector, depending on the complexity and durability of their products as well as on already existing sector specific solutions.

We would like to offer our expertise and constructive support. We strongly encourage the Commission to advise the Agency to consider our experience with data collection, Confidential Business Information (CBI) protection, customer communication and provision of relevant information to waste operators.

Furthermore, our early involvement into any definitions of interfaces between the DB and external systems as well as in the discussions on the just announced DB prototype is key to avoid negative impact to our industry and to achieve the Circular Economy objectives in a pragmatic and effective way.

We are looking forward to your response and would appreciate the opportunity to discuss this important topic directly with you.

Thank you very much and with kind regards,

A handwritten signature in black ink, appearing to read 'Jens Warsen', is written in a cursive style.

Jens Warsen

ACEA Environmental Policy Director