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Information Letter

EU Waste Framework Directive 2008/98/EC

Dear business partners,

Recently, we have been receiving an increasing number of enquiries regarding the 'compliance' of our products with the EU Waste Framework Directive 2008/98/EC (WFD).

We would be pleased to provide you with a clear and technically accurate classification.

1. Nature of the Waste Framework Directive

The EU Waste Framework Directive 2008/98/EC is a fundamental directive on waste management. It is aimed at:

- Waste producers
- Waste owners
- Waste treatment operators
- Member States (legislative implementation)

The directive defines basic principles such as waste hierarchy, disposal routes, recycling quotas and obligations for waste management.

However, it does not contain any product-related requirements or substance restrictions.

2. No product conformity required

For manufacturers or distributors of products such as technical seals, elastomers, plastics or fibre materials, the Waste Framework Directive does not impose any obligations regarding product conformity.

There is no legal basis for declaring 'WFD conformity' for products.

Therefore, like all companies in a similar position, we cannot issue any product-related confirmation regarding the Waste Framework Directive.

3. Relevance to our company

The directive applies to us exclusively in our role as waste producers within our own company, e.g. production waste (punching residues, offcuts, packaging), waste from warehousing and logistics, or internal disposal processes.

We naturally fulfil these internal obligations in accordance with national legal requirements.

4. Connection with SCIP reports

In some cases, enquiries about the Waste Framework Directive are confused with SCIP reporting obligations.

However, the SCIP database is not based on the Waste Framework Directive itself, but on REACH Article 33 (SVHC information obligation). If a product contains an SVHC substance $\geq 0.1\%$ by weight, we comply with the relevant information and reporting obligations.

5. Summary

The EU Waste Framework Directive does not contain any requirements for products or their ingredients.

A 'declaration of conformity' with the directive is not provided for and is not meaningful.

Instead, our products are subject to other relevant chemical and substance regulations (e.g. REACH, POP, TSCA, etc.).

Our internal waste processes comply with the national implementations of the directive.

Please do not hesitate to contact us if you have any questions.

Kind regards,
Your Möller team

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