



Eurometaux
European Association of Metals



Eurometaux's proposed measures to ensure an effective EU circular management of metals in the economy

Dynamix/Polfree Conference
An ambitious Circular Economy package for Europe

14 April 2015



Se Al Cu Ni Pb Sn Zn Au Ag Pt Sb W Be Si Cr Co Mo Ge V Mn Ir Ru Rh Ta

Europe's non-ferrous metals industry

Driving EU economic growth and innovation

€ **120 bn**
annual turnover

500 000
direct employees

3 000 000
indirect jobs along
the EU value chain

47 million tonnes of annual production



Representing **over a fifth** of global production

Non-ferrous metals: Endlessly recyclable



of base metals and
alloys come from
recycled sources



of the Earth's crust
is made up of
non-ferrous metals

Non-ferrous metals: **Building blocks for a sustainable society**

Fundamental components in:



Renewable Energy Sources



Low-carbon transport



Sustainable buildings



Efficient communications



Resource-efficient packaging



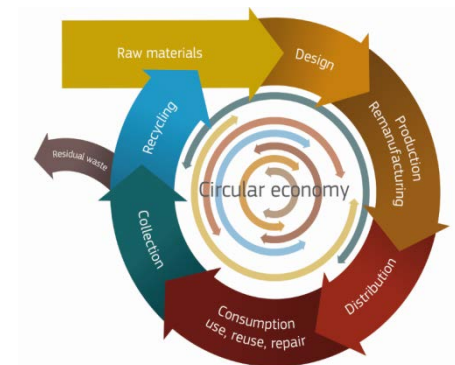
Cutting-edge healthcare

Strategic Objective

- Move from “waste” management to “resource” management
- Secure cost-efficient access to secondary raw materials

Principles

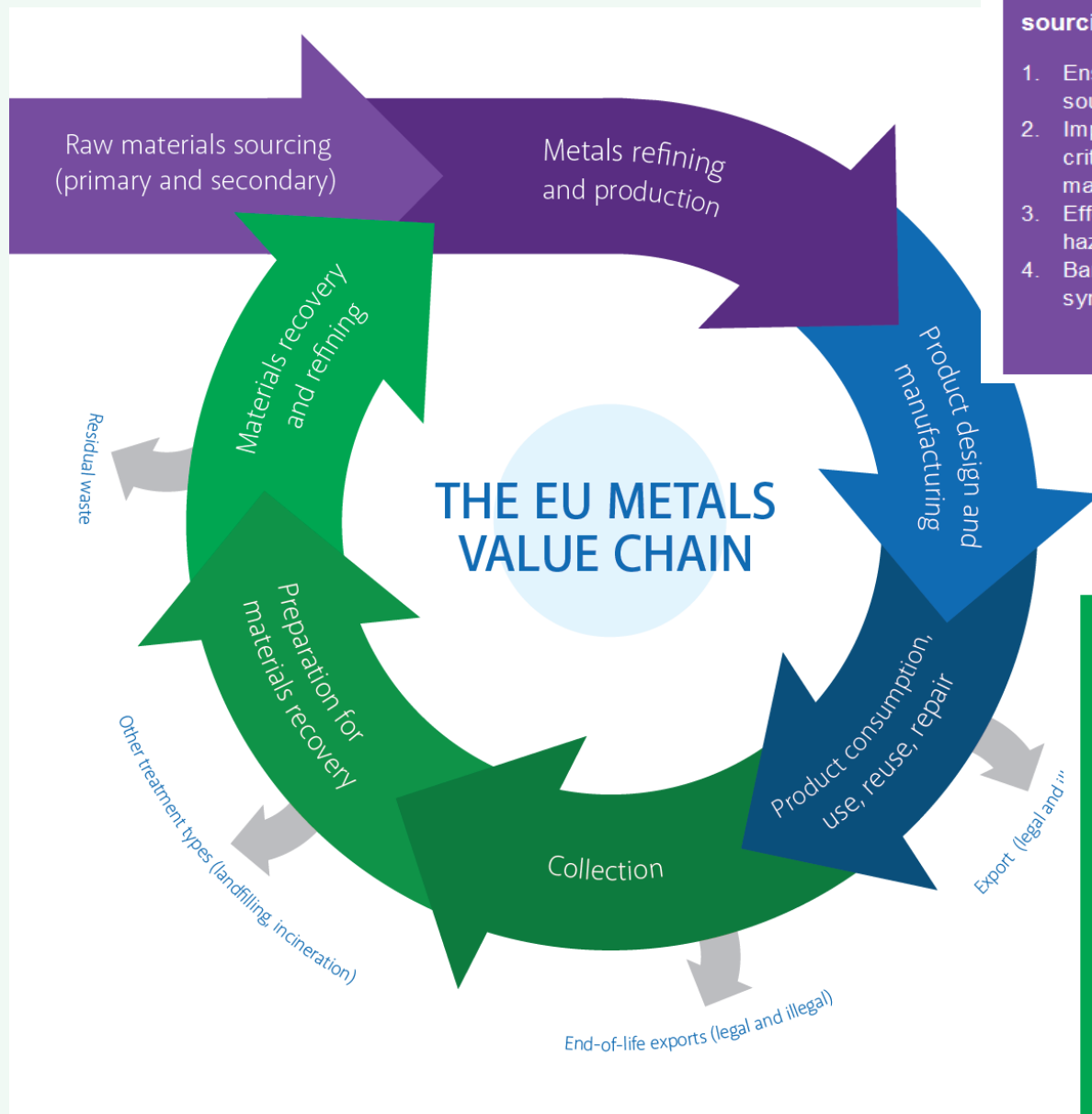
- Recovery of materials (collection is indispensable but not enough)
- Quality recycling (process and yield efficiency)
- Importance of value chains



System innovation

- Support to recycling starts with a good analysis of the recycling flows
- Collection is indispensable but the objective is not only to treat quantities of waste but also to recover valuable materials
- There is a joint responsibility along the value chain to ensure that sound recycling takes place!
- Innovation is key to support new recycling business models and technological improvements





Challenges – metals sourcing and production

1. Ensuring sustainable sourcing
2. Improving EU access to critical & valuable raw materials
3. Effectively regulating hazardous substances
4. Barriers to industrial symbiosis

Challenges - metals use

5. Implementing recyclability within product design
6. The consistency of EU products policy
7. Guarantee of materials recovery after product reuse/repair

Challenges - metals recycling

8. Sub-optimal collection and sorting schemes
9. Landfilling of post-consumer goods containing valuable metals
10. Pre-treatment challenges
11. End-of-Waste
12. A lack of transparent and harmonised calculation method, definitions and reporting
13. A lack of global level playing field conditions
14. Illegal shipments of waste to non-EU countries
15. Technological challenges
15. Enforcement of waste legislation & transparency

Challenges to increased circularity of metals

1. Sustainable Sourcing

- EU metals companies are involved in supply chain initiatives
- Primary and secondary materials sometimes mixed

2. Access to Critical Raw Materials

- Europe is highly dependent on imports of critical and valuable materials
- Waste policy focuses on volume

3. Effectively regulating hazardous substances

- Chemicals legislation relies mainly on hazard rather than managing exposure and use, thus risk
- Some hazardous metals are present in recycling loops but if encapsulated and treated properly recycling presents no risk

4. Barriers to industrial symbiosis

- As metals have a value the principle is applied

Challenges to increased circularity of metals

5. Implementing recyclability within product design

- The design stage is critical to recyclability & durability

6. Consistent product policies

7. Guaranteeing materials recovery after product reuse/repair

- High quality recycling should always be ensured

8. Harmonised definition, targets and calculation method

- Confusion in legislation – recycling rates are collection rates!

9. Sub-optimal collection and sorting schemes

- Material recovery depends on the efficiency of the previous steps

10. Landfilling of post-consumer goods

- A ban alone is not enough! Industrial landfill is a different story

11. Lack of level playing field and illegal shipments of waste

- Free and fair trade to support value creation, secure supply of RM in Europe
- If 1% of all EU waste shipments were illegal = 2,8 M T /year

Challenges to increased circularity of metals

12. Technological challenges with recycling increasingly complex products

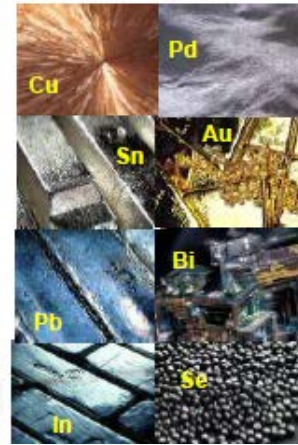
- EIP on RM has rightfully highlighted the importance of RM

13. Need for transparency and better MS enforcement of waste legislation

How can the Circular Economy package address the challenges?

1. Sustainable sourcing

- Support internationally recognised voluntary schemes such as the OECD Due Diligence Act
- Support quality recycling as a way to ensure sustainable secondary RM supply



2. Access to critical raw materials

- Take a product centric approach to evaluate feasible options for recovering the most relevant materials from end-of-life products
- Ensure wider focus on critical and valuable raw materials

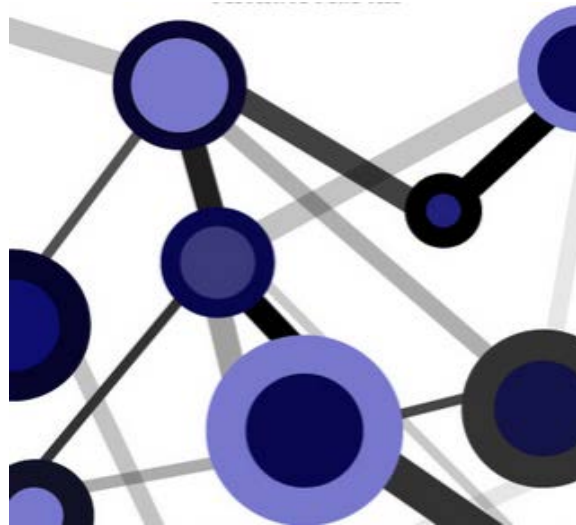
3. Effectively regulating hazardous substances

- Advocate a risk-based approach to avoid disproportionate restrictions on the use or recycling of certain metals
- Promote the use of socio-economic assessments when regulating the use of hazardous substances

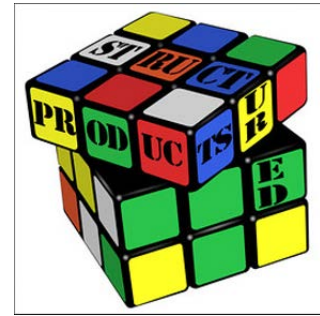
How can the Circular Economy package address the challenges?

4. Barriers to industrial symbiosis

- Facilitate the transport of waste and by-products across MS while avoiding weakening controls



How can the Circular Economy package address the challenges?



5. Implementing recyclability within product design

- Generic EU regulatory requirements on recyclability in product design, with a flexible implementation approach per product group
- Avoid taking a “recycled content” approach for metals

6. Consistency of EU product policy

- Work towards a coherent EU product policy framework, based on harmonised methodologies and lifecycle approaches
- Avoid overlaps of EU product policies with other pieces of EU legislation

7. Guaranteeing materials recovery after product reuse/repair

- Take a lifecycle approach to managing the resources embedded in products, and include requirements to guarantee the quality recycling of products being exported for reuse/repair.

How can the Circular Economy package address the challenges?

8. Definition of “recycling”, targets

- Recycling value chain has three steps: collection, preparation for materials recovery and materials recovery
- Objective is to recover material
- Adopt ambitious, but pragmatic waste recycling targets.
- Adopt clear definitions and a harmonized calculation method

9. Sub-optimal collection and sorting schemes

- Introduce separate collection of waste streams at their source, and waste-stream specific collection targets
- Implement minimum operating conditions for EPR schemes, including shared responsibility, fair cost-sharing and accountability
- Enhance transparency across the entire value chain



How can the Circular Economy package address the challenges?

10. Landfilling of post consumer goods

- Introduce a progressive landfill ban on recyclable post-consumer goods, to be supported by complementary measures promoting quality recycling from collection through to material recovery



11. Lack of level playing field conditions & illegal shipments

- Include provisions for establishing a mandatory EU certification scheme applicable to some waste streams (e.g. WEEE, batteries)
- Further develop the WSR's "pre-authorised facilities" status
- Facilitate EU trade for recycling of by-products, waste and end-of-life products, whether intra-Europe or imported into Europe
- Optimise supporting measures in the WEEE and ELV directives
- Take measures to improve control at borders, including :

- Harmonised control of shipments at harbours to avoid "port hopping".
- Identification of second hand goods in customs declarations
- For waste streams exposed to illegal shipments requirement that secondary materials may only be exported if a final processor is duly identified and certified



Challenges and proposed solutions for a more circular management of metals

12. Technological challenges with recycling increasingly complex products

- Encourage better R&D coordination between regions and Member States, and provide better EU funding opportunities and synergies for circular economy innovation projects

13. Need for transparency and better MS enforcement of waste legislation

- Reinforce the role of Impel

TECHNOLOGY CHALLENGES



THANK YOU
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