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

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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

52% of base metals and alloys come from recycled sources
13% 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
THE EU METALS VALUE CHAIN

Raw materials sourcing (primary and secondary)

Metals refining and production

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
16. Enforcement of waste legislation & transparency

Collection

Product consumption, use, reuse, repair

Export (legal and illegal)

Other treatment types (landfilling, incineration)

End-of-life exports (legal and illegal)

Preparation for materials recovery and refining

Materials recovery and refining

Recycled waste
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
THANK YOU

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