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## Boosting the circular management of metals

There is a general concern in society today about both the earth's limited resources and their use in an efficient and sustainable manner to minimise the environmental impact. Using materials efficiently creates "more with less" and delivers greater value for society with less input. Metals are perfectly suited for a circular economy as they can be infinitely recycled and are as such true enablers of a circular economy.

The European metals industry looks forward to an ambitious Circular Economy Package supporting growth, innovation, competitiveness and jobs.

To close the circle materials need to find their way into new product life cycles this requires **a move from waste management to resource management**. Hence the new Circular Economy Package should ensure stable and cost-efficient access to secondary raw materials for the development of a modern society.

The metals industry would like to highlight some challenges and opportunities to an improved circular management of metals.

### 1) Recycling of valuable materials

To reach the strategic objective of recovering more valuable materials embedded in products, a number of concrete measures need to be implemented.

- Adoption of clear definitions within the EU waste legislation and a harmonized calculation method, bearing in mind the objective of moving from waste management to resource management (material recovery). The point of measurement should be as input into the "preparation for material recovery" process.
- The recycling value chain consists of three steps, namely collection and waste sorting, pre-treatment and the material recovery process (final recycling). The Circular Economy package should promote the treatment of waste until material are recovered and are ready for reuse in products.
- Adoption of coherent, ambitious, but realistic waste recycling targets for all materials.

### 2) Recognition of permanent materials and fostering their collection

Metals can be recycled without losing their original properties and being thus fully in line with society's vision of a circular economy. Many metals are recycled at high rates and the preservation of their inherent properties after recycling classifies them as "permanent materials". Therefore, the categorisation of materials as renewable or non-renewable only is not sufficient to encourage best practices in sustainable resource management. Nevertheless, the potential to maintain or improve metals recycling rates greatly depend on the effectiveness of the collection and pre-sorting activities. The Circular Economy package therefore should

- introduce separate collection of waste streams at their source, and waste-stream specific collection targets. For some specific waste streams as for instance those coming from spent batteries or WEEE, these should also be complemented by quality standards for the pre-processing and end-processing steps;
- implement Extended Producer Responsibility (EPR) schemes, including shared responsibility, fair cost-sharing and accountability. These schemes should foster the use of “permanent materials” by securing that the end-of-life products are adequately collected and sorted;
- formally recognise and value the concept of “permanent materials”.

### **3) Product design for Circular economy**

The Circular Economy objectives should be implemented through product policies in order to better ensure and promote re-use, repair, re-manufacturing and recycling as “end-of-life” options for products. To this end, the Circular Economy package should

- support the implementation of generic EU regulatory requirements on durability, reparability and recyclability in product design (design for recycling), with a flexible approach to the implementation for each product group and taking account of economic and technical constraints for end-of-life treatment;
- promote the appropriate “recycling metrics” for each material used in product design in order to incentivise more materials recycling. The “end-of-life recycling” metrics promotes effective recycling, again and again, of metal-bearing products at their end-of-life (multiple recycling) whereas the “recycled content” approach does not efficiently work for metals.

### **4) Facilitate the quality treatment and use of waste and by-products**

The EU should facilitate the treatment and utilisation of waste and by-products by quality recycling facilities to recover and use as much valuable material as is economically and technically feasible. However, the transport of these waste and by-products within the EU and the lack of harmonised and supportive legal framework in some cases undermine effective quality treatments. To facilitate the proper treatment of waste and by-products, the Circular Economy package should

- adopt a workable legal framework recognising the by-product status to co-generated products;
- recognise the need for harmonised definitions of waste and by-products across Member States;
- facilitate EU trade for the use and/or recycling of by-products, waste and end-of-life products, through simplified administrative requirements (e.g. electronic information exchange) and through the use of the Waste Shipment Regulation’s “pre-authorised facilities” status;
- ensure free and fair trade of raw materials, products and waste. To this end, level playing field conditions must be established for the treatment of waste and valuable materials embedded in products. Waste need to be recycled in accordance with quality practices, which in some cases should be defined in standards;
- facilitate the use and valorisation of industrial by products in the spirit of the ‘industrial symbiosis’ (ensuring access to the market as is the case for natural materials).

### **5) Stimulate investments in the most innovative technologies to improve collection, sorting and quality recycling**

Intelligent EU funding and other non-discriminatory fiscal incentives respecting the waste hierarchy should be used for stimulating the European Circular Economy. This should trigger further investment to drive resource efficiency at the product level, with a particular focus on innovative sorting technologies and collection systems (including in advanced bottom ash treatment) and promote

industrial symbiosis, thus generating direct waste management synergies at European level.

## 6) Consistency across different legislations to support recycling

Within the EU, the safe management of chemicals is regulated by the REACH and CLP Regulations, along with several other pieces of legislation which provide requirements on aspects such as air or water emissions. However, chemicals management too often relies on a hazard assessment, rather than providing a tool which achieves an effective management of exposure and thus risk.

Interaction between chemicals (REACH and CLP) and Waste legislation should not hinder the goal of the Circular Economy which is to incentivize recovery, recycling and transforming waste into a resource. The increasing number of chemicals restricted or prohibited in products and hazardous-based – instead of risk-based – approaches in waste treatment and recovery can lead to less recycling due to disproportionate requirements, making thus recycling operations technically and economically less viable.

- Waste and product recycling should be tackled via a risk-based approach leading to safe and cost-effective recycling practices, thereby enhancing the Circular Economy.
- The different policies regulating the use of chemicals should be better integrated and harmonised within the EU.

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