

EU Circular Economy Package – Overall Recommendations

Introduction

The European metals industry commends the European Commission for starting to address the full materials lifecycle in its Circular Economy package. MEPs & Member States now have a key role to strengthen requirements.

This paper provides a concise summary of our recommendations on the Commission's waste legislation proposals and Action Plan, as well as links to our more detailed papers on key topics.

Waste legislation proposals – key recommendations

Despite their endless recyclability, too many metals are poorly collected & treated. In 2014, only 1/3 of EU e-waste was well recycled, while €4.3bn of metals scrap was exported without guarantee of high-quality treatment.

The EU's waste legislation can improve this situation by incentivizing **material recovery** from products, scrap and industrial by-products. In that direction, Eurometaux has four key recommendations to strengthen proposals:

1. Measure real recycling rates

Currently, Member States calculate their recycling rates differently, creating inconsistencies. Some only base recycling rates on collected waste, despite this including waste that will be landfilled, incinerated or exported.

The European Commission has proposed a harmonised method for calculating recycling rates at the input into a "final recycling process", through which the material or substance is recovered and can substitute the primary material for input into a new product life cycle. This should be supported as the essence of a circular economy.

[Read more in our dedicated recycling rate paper.](#)

2. Promote high quality treatment of European metals

When recovering valuable & critical metals, high-quality treatment processes are required to maximise yields, and recover small quantities from complex products. They also enable safe treatment of hazardous substances.

The Commission's proposal requests that Member States promote "high-quality recycling" for key waste streams. This needs to be defined on a material-specific basis, focussing on "high-quality treatment" for metals.

3. Make sure exported waste is recycled under equivalent conditions

In 2014, the EU exported over 2 million tonnes of aluminium and copper scrap, & 1.3 million tonnes of e-waste. There's no guarantee that exported waste is recycled properly, risking material losses & environmental damage.

We support the Commission's proposal that for EU recycling targets, waste exports must be recycled under "equivalent conditions", but that needs to be qualified through reference to a process standard. For some waste streams, such as WEEE and batteries, we strongly advocate for a certification scheme which supports controls of exported waste and ensures the quality treatment of these complex waste streams.

4. Establish ambitious and effective recycling targets

Of the 470 kg of waste generated per person in 2013, 31% ended up in landfill and 26% was incinerated. In some countries, landfill rates are still as high as 97%.

To make sure that recyclable waste reaches high-quality recyclers, the Circular Economy package must continue to include an ambitious EU target to minimise landfill. We're also calling for a separate recycling target for construction & demolition waste, which explicitly includes "backfilling".

Further recommendations are provided in [Eurometaux's dedicated waste legislation position paper](#)



Circular Economy Action Plan – Key Recommendations

To establish a true Circular Economy, wide-ranging actions must be taken across the materials lifecycle. The European Commission's Action Plan is an important first step to set the trajectory for broader EU policy action.

When reviewing the Action Plan, Member States can take several actions to further improve the circular management of Europe's materials:

1. Facilitate shipments of waste across EU borders, for recovery and recycling

Shipments of waste for recovery and recycling remains burdensome, due to the non-harmonised status of waste and by-products across Member States, and the use of national waste codes by some Member States.

It's important for Member States to implement harmonised definitions of waste and byproducts, and for EURL waste codes to be used across Europe. The Waste Shipment Regulation's "pre-consented recovery status", is not truly facilitating the shipments to authorised operators. A harmonized and simplified fast-track procedure could significantly reduce the bureaucratic burden for intra-EU waste shipments and increase the amount of waste and by-products recycled. [Read more in our dedicated "pre-consented recovery status" paper.](#)

2. Establish mandatory certification schemes for recyclers of certain waste streams

For complex products such as electronic waste and portable batteries, a mandatory certification scheme covering environment, health, governance and process efficiency standards would be important to ensure high-quality treatment, both in and out of Europe.

The Action Plan already promotes industry-led voluntary certification of treatment facilities for key waste streams, but this would not be effective in addressing operators conducting low-quality treatment.

3. Foster the recovery of valuable & critical raw materials in electronic and other products

Despite containing valuable and critical metals, recycling rates for electronic products remain low. In 2014, only 35% of EU electronics waste was properly recycled. 33% was recycled under non-compliant conditions, and 15% exported.

Together with stakeholders, the EU needs to work towards a deep understanding of the relevant value chains.

4. Ensure a sound interaction between REACH and waste policy

To avoid discouraging the recycling of certain metals in Europe, a coherent approach is needed to regulate hazardous substances in the Circular Economy.

Notably, this should include an identification of the most efficient risk management tool for regulating each substance, as applicable. This will help to ensure effective risk management, while avoiding unnecessary burdens or unjustified bans. [Read more in our dedicated hazardous substances & Circular Economy paper.](#)

Further recommendations are provided in [Eurometaux's dedicated Action Plan position paper.](#)

About Eurometaux

Eurometaux, the European non-ferrous metals association, represents the broad non-ferrous metals supply chain – from mining and refining to processing, fabrication and recycling. Europe's non-ferrous metals industry has an annual turnover of €120bn, and creates 500,000 direct jobs and over 3 million indirect jobs in Europe.

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