



Mr. Daniel Calleja Crespo, Director General, DG ENVI  
Mr. Lowri Ewans, Director General, DG Growth

Copy to M. Pellegrini, DG Growth and H.M. Schally, DG ENVI

Brussels, 10<sup>th</sup> November 2015.

Dear Mr. Calleja Crespo,  
Dear Mr. Ewans,

As you know, the European metals industry is keenly expecting the new Circular Economy package which the Commission will adopt by the end of the year. Metals, that can be recycled again and again without losing their properties, are an essential leverage to more circularity of materials. In the last run to the adoption of the revised package, we would like to insist on the need to remain ambitious and concrete to generate the targeted positive effects of the package. We therefore reiterate our key messages to support enhanced recycling and the circular management of metals.

**The overarching objective should be to recover more material from waste, by-products and end-of-life products. To this end a few measures are critical**

- Implement generic EU regulatory requirements on recyclability and durability in product design
- Implement separate collection of waste streams at their source.
- Apply minimum operating conditions for Extended Producer Responsibility (EPR) schemes
- Adopt ambitious, but pragmatic waste recycling targets and a harmonized calculation method (before the material goes into the recycling stage)
- Progressive landfill ban on all recyclable post-consumers goods and implementation of the waste hierarchy to avoid diversion from landfills to incineration (rather promote re-use or recycling)

**Too much of the valuable material embedded in waste, by-products or end-of-life products are not recycled properly due to some poor treatment or illegal or dubious exports (leakage). This should be addressed among others through:**

- a mandatory EU certification scheme applicable to certain waste streams (e.g. WEEE and batteries), in order to provide the required framework for quality recycling of EU scrap.
- measures to improve control at borders, in order to minimise illegal exports of waste
- regular monitoring of end-of-waste export flows





- Provide increased funding for circular economy innovation and R&D projects, in particular supporting the recycling of increasingly complex products.

**Finally, we would like to insist on the need to adopt measures as soon as possible to facilitate the quality treatment/recycling of waste, end-of-life products and by-products in Europe. To this end, some measures are urgently needed:**

- Harmonised definitions of waste and by-products across Member States
- Uniform use of the EURAL waste codes in Europe (no national codes).
- Improve the “pre-consented facilities” status to facilitate waste shipments to quality facilities while avoiding weakened controls. The improved status would be valid for three years (instead of one) and would allow notification electronically and the possibility to transport the waste upon notification. The status should be linked to a registration number facilitating notification and tracking by authorities.

The metals industry has great hopes for a Circular economy package that will be concrete and provide framework and regulatory conditions when need to support the competitiveness of the EU recycling industry that is the best world recycling industry.

We remain at your entire disposal to discuss this further or provide any clarification,

Guy Thiran  
Director General

#### **About Eurometaux**

Eurometaux, the European non-ferrous metals association, is composed of a wide network of companies producing, transforming and recycling non-ferrous metals in Europe. Our membership also includes national federations, and European and International commodity associations. Our objective is to enable the entire value chain of the non-ferrous metals industry to prosper in the EU and contribute towards more sustainable societies.

#### **Non-ferrous metals: Driving economic growth in Europe**

The European non-ferrous metals industry has an annual turnover of over €120bn, with over 47m tonnes of annual production. Metals enable European innovation by providing a wide range of other industries with essential materials to invest in research and development. The industry employs more than 500,000 people directly, and another 3,000,000 indirectly.

#### **Europe's non-ferrous metals industry: Committed to Sustainability**

The non-ferrous metals industry, especially in Europe, has made continuous progress in reducing its environmental impact by improving its resource- and energy-efficiency. Overall, the metals industry in Europe outperforms most other regions in the world, and will continue to operate with the highest environmental standards.

