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Eurometaux welcomes the amendments to the Waste Shipment Regulation adopted by the European Parliament

Eurometaux welcomes the amendments to the Waste Shipment Regulation adopted by the European Parliament on 17 April, which address the important and challenging problem of illegal shipments of valuable material embedded in waste and end-of-life products outside the EU. The amendments point to the right problems and propose useful measures. However, Eurometaux believes that the amendments are not sufficiently ambitious and should go further so as to significantly reduce the estimated 25% of illegal shipments.

The EU recycling industry has the potential to develop still further, provided that the right framework conditions are created. The challenges include improved access to secondary raw materials, notably by halting illegal exports of scrap and end-of-life products, quality recycling targets for each of the three stages of the recycling value chain (collection, preparation for recovery and material recovery), and a global level playing field to ensure that secondary materials exported legally or illegally are treated in acceptable environmental, health and efficiency conditions.

Eurometaux welcomes the introduction of requirements regarding inspection planning by MS and the reverse burden of proof whereby MS can require evidence from suspected illegal waste exporters regarding the status of the material, the nature of the treatment foreseen, and the conditions in which it will be treated. These provisions will help to combat illegal shipments of valuable materials, and will thereby support the EU recycling industry by securing more access to secondary materials. Eurometaux also supports the provision for an Electronic Data Interchange system as a way of improving the transparency and traceability of waste flows.

Eurometaux calls for strong implementation of the Regulation by all Member States and for active cooperation between Member States authorities. However, Eurometaux fears that the request for documentary evidence may not be sufficient to ensure compliance with Article 49. Further measures may be needed to address this important issue, such as the certification of recycling facilities for some waste streams.

On the other hand, Eurometaux believes that efficient controls should be complementary to measures aimed at facilitating legal trade, especially within the EU, for example with regard to time delays for shipment.

Eurometaux, the European Association of Metals, represents the European non-ferrous metals industry

- **The NF-metals industry is indispensable for modern society.** Thanks to their intrinsic properties – including durability and recyclability - non-ferrous metals are vital to meet essential societal needs and to build a low-carbon economy.
- **Non-ferrous metals contribute to the European - and global - creation of wealth and jobs:** they represent 2% of EU GDP and create 450,000 direct jobs and over 1 million indirect jobs in Europe. Their use in high-tech and high added-value activities makes them very valuable to the EU’s economy and competitiveness.
- **The NF-metals industry contributes to resource efficiency** by enhancing the in-use phase of products and also thanks to high recycling rates ranging between 30% and 95%, depending on the metals and their use. Primary and secondary raw materials are complementary, as secondary raw materials cannot on their own meet the growing needs of a sustainable economy.

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Eurometaux is the Brussels-based EU association of the non-ferrous metals industry, representing the main EU and international metals producers, EU and international metal commodity groups and national metal federations. The industry covers base metals (Al, Cu, Pb, Ni, Zn, Sn, Sb), precious metals (Au, Ag, PGM’s) and technical metals (e.g. Co, W, Cr, Mo, Mn), manufactured from both virgin and recycled raw materials.

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