

Eurometaux Position on Extended Producer Responsibility

Introduction

Resource efficiency and access to raw materials are key strategic objectives. It is in the interests of all economic actors active in the EU to secure access to secondary raw materials and ensure their quality recycling, as this will in turn support growth and jobs in Europe.

The recycling value chain can be broken down into three separate, but highly interdependent steps: collection, preparation for material recovery (pre-processing) and material recovery (end-processing). The non-ferrous metals companies that recycle end-of-life products or scrap can only recycle what they can access, and in this sense the efficiency of the collection and pre-treatment steps have a real impact on the availability of secondary raw materials and on the overall efficiency of the recycling value chain.

Eurometaux believes that European policies should aim to ensure that as much recyclable waste as possible is recycled in efficient conditions in order to recover as much valuable material as is economically and technically possible. Recycling should meet quality standards from collection through preparation for recovery, and finally material recovery.

Eurometaux generally supports the 10 Golden Rules developed by the Business Coalition (input into EREP) and would like to propose in addition some views and recommendations regarding the functioning of extended producer responsibility schemes.

Promoting quality treatment across the entire recycling chain

EPR schemes should not only focus on costs and meeting existing obligations. They should include access to raw materials and resource efficiency dimensions through quality recycling objectives throughout the operations so that more materials (higher yields and range) can be recovered at higher rates. EPR requirements should therefore include quality standards from collection through preparation for recovery, and finally material recovery. Special attention should also be given to improving the recovery of critical/technology metals; this could also be included in the EPR requirements (and possibly later on reflected in the recycling targets).

Such quality standards should be applicable globally in order to support level playing field conditions for the recycling industry and the high-quality treatment of European waste. Complex waste streams treated outside the EU (for e.g. WEEE or batteries) can only count towards the fulfilment of obligations and targets of European legislation (WEEE Directive or Battery Directive) if the same EU criteria/requirements have been met. These should cover both preparation for recovery (pre-processing) and materials recovery (end-processing). In this respect, a certification scheme set up for recycling facilities would be the right tool to ensure both enforcement of existing provisions and quality treatment. The certification scheme would cover criteria related to environment, health and process efficiency (technical performance such as range of yields of recovered materials).

Performance of packaging collection schemes

National recovery schemes should be obliged to meet the following minimum criteria:

- Full coverage of geography, population and packaging materials;
- No "cherry-picking" of packaging materials, for example by focusing only on large volumes and ignoring smaller fractions with high scrap values such as aluminium;
- Manage a professional waste-management operation based on a set of minimum performance criteria related to high quality collection, sorting and recovery;
- Provide transparent and accurate data / numbers;
- Fair allocation of costs between materials, also taking into account their scrap values.
- Also address 'outside-home' collection by adding dedicated collection activities for packaging items typically consumed' on the go' or at the workplace (e.g. beverage cans).

Control and enforcement mechanisms of EPR organizations

In order to verify compliance and ensure enforcement of different provisions/requirements, EPR schemes must undergo regular third party audits and reviews, which should cover the entire recycling chain from collection to end-processing.

Transparency

Transparency must be enhanced across different EPR schemes, and all flows should be better measured and monitored across the entire recycling chain, from collection to preparation for material recovery and final material recovery. This would minimize leakages and contribute to the better enforcement of existing collection and recovery/recycling obligations. An appropriate tool to measure and monitor the flows is the tracing and tracking of end-of-life products such as WEEE, batteries and/or ELVs down to their final destination. Furthermore, in order to increase transparency, existing provisions related to shipments of waste (for WEEE provisions included in Annex VI) need to be properly enforced so as to make a better distinction between exports of WEEE versus exports of used EEE. For example, exports of used EEE designed for re-use outside the EU should be accompanied by appropriate documentation as well as appropriate protection against damage during transportation and loading/unloading through sufficient packaging and appropriate stacking.

Individual producers' responsibility

All actors (producers, take-back schemes, waste management companies, recyclers, municipalities/local authorities etc.) need to take full responsibility all along the value chain in order to contribute to EPR implementation and enforcement. As regards producers, their responsibility should not merely consist of participating in an EPR organization. For example, a cell phone producer who joins an EPR scheme could easily fulfil his official responsibility despite the fact that the collective take-back scheme might collect zero cell phones. It is therefore very important to have collection / recycling targets per product category, also for producers who run their own schemes.

There should not be too much of an imbalance between actors in the value chain, with some being wealthy while others being unable to find sufficient resources to recycle! The objective is to ensure quality recycling!

- **The NF-metals industry is indispensable for modern society.** Thanks to their intrinsic properties – including durability and recyclability - non-ferrous metals are indispensable 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 meet the growing needs of a sustainable economy on their own.

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