

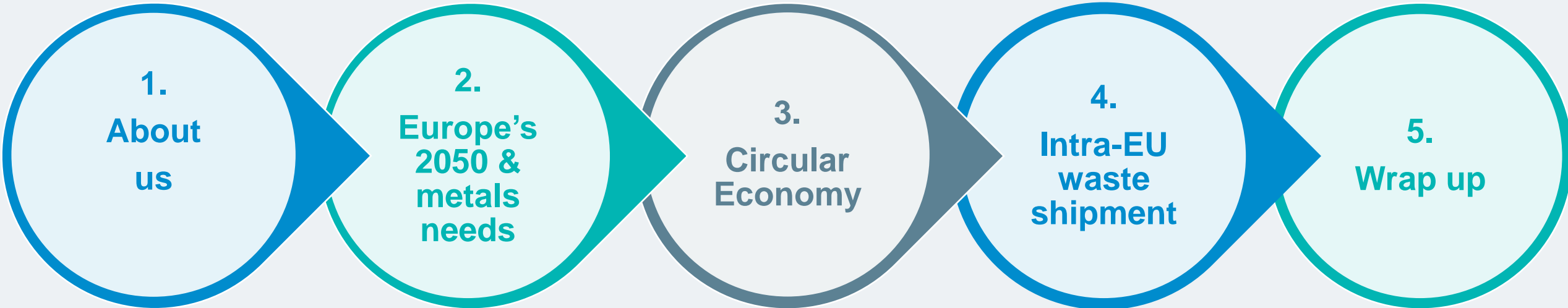
Intra-EU waste shipments: our key asks for the WSR revision

Kamila Slupek

EUROFER, Eurometaux, IndustriAll – Joint Workshop for the Permanent Representations attachés
Brussels, 29/11/2022



Today's presentation plan





1. About Eurometaux

Eurometaux membership

26

Company members,
across the full
non-ferrous metals
value chain



8

Commodity
associations

12

National associations

22

Associate members



2. Europe's 2050 transition & metals needs

The energy transition is a commodities transition

Europe's energy transition = Massive increase in metals demand by 2050



Base metals

Al

+33%

Aluminium

Cu

+35%

Copper

Si

+50%

Silicon

Top transition uses:



EVs



Solar



Electricity networks



Battery materials

Ni

+103%

Nickel*

Co

+331%

Cobalt

Li

+3,500%

Lithium

+ Manganese & Graphite

Top transition uses:




EVs



Battery storage



www.eurometaux.eu/metalscleanenergy

The background of the image shows a disassembled smartphone. On the left, there is a green printed circuit board (PCB) with various electronic components, including a camera lens and several integrated circuits. To the right, the black back cover of the phone is visible, with some screws and a small black component. The entire scene is set against a light, neutral background.

3. Circular Economy

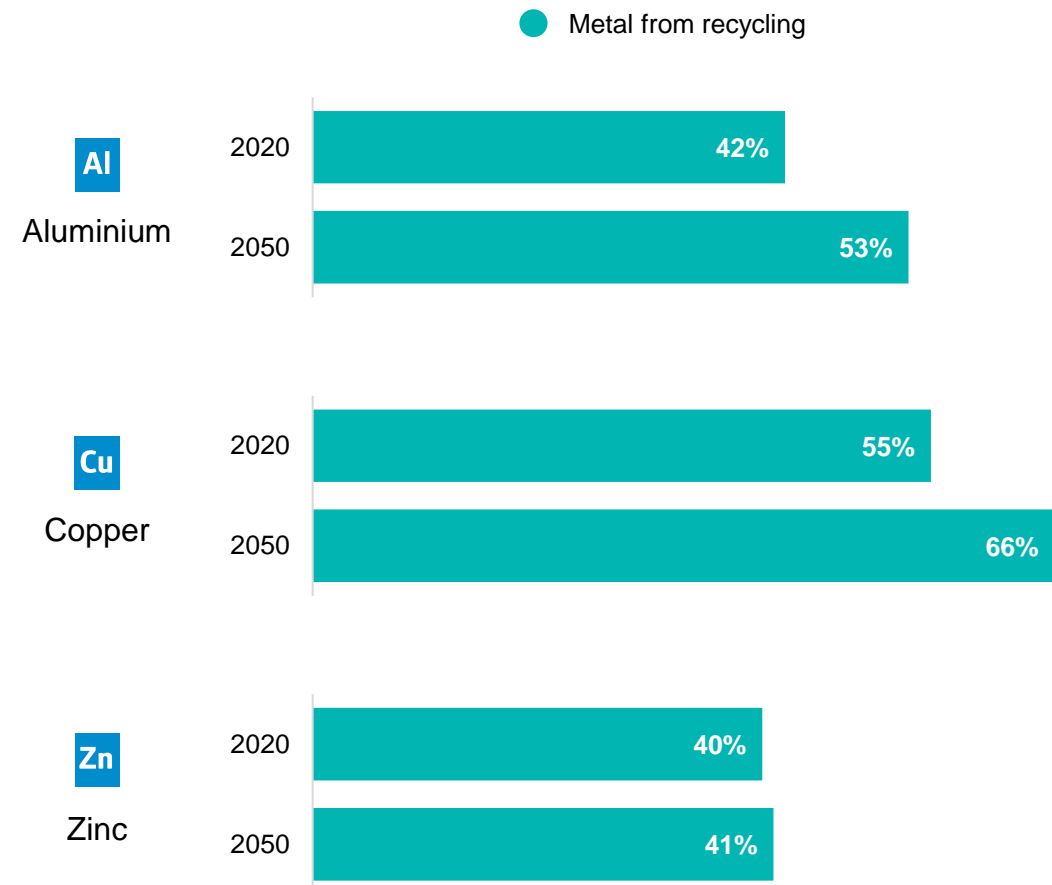
Recycling is Europe's key long-term driver in creating strategic autonomy

Circular Economy actions will raise base metals recycling rates

Mature markets

Aluminium, Copper, Zinc

- Recycling can supply 40-65% of Europe's higher base metals demand in 2050, saving CO₂ emissions
- Recycling bottlenecks must be addressed to raise rates:
 - Smarter product design
 - Improved collection & sorting systems
 - Control of scrap leakage



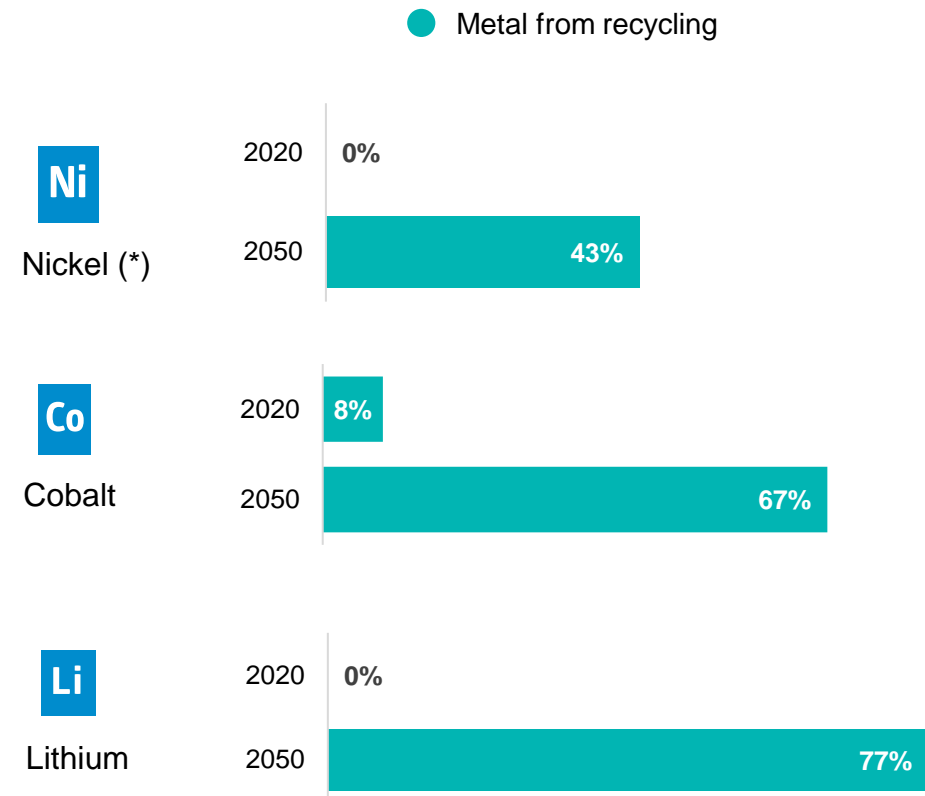
Recycling is Europe's key long-term driver in creating strategic autonomy

Massive potential after 2040 for new energy commodities

New energy commodities

Lithium, cobalt, nickel, rare earth elements

- Recycling volumes will rise after 2040 contributing to EU's 2050 battery supply chain plans
- E-vehicles market will mature → cars will reach EoL stage
- Best case scenario, requiring:
 - New recycling capacity
 - Process improvements & economic viability
 - Control of scrap leakage



Make sure that metal containing waste goes to the high-quality recyclers

Ideally, a three stage process:

Official
collection



Dismantling &
pre-processing



State-of-the art metal
recovery facilities



*Following
these 3 stages*

*= Maximum recovery
of materials*

*+ Safe treatment of waste
(also those containing
hazardous substances)*

'Doing by the book' in Europe is bureaucratic and burdensome



Heavy notification procedure for hazardous waste shipments

Result for high-quality EU recyclers:

Shipments of waste across EU borders

High costs = *Big delays*



**4. Intra-EU waste
shipments:
Recommendations**

What is needed to facilitate the intra-EU waste shipments

Recommendations to the EC proposal

Electronic Data Interchange (EDI) system (Art. 26)

- Test the system with the real actors: MSs authorities & the actual waste market actors.
- Timely prepare and adopt the implementing act establishing technical and organisational EDI requirements.

Pre-consented recovery facilities (Art. 14)

- Strengthen the status of pre-consented facilities to achieve an effective fast-track procedure for shipment and recovery of waste
- Keep sufficiently long validity of the pre-consent status (e.g. 7 yrs. proposal by the EC)
- Revoking the pre-consented status needs to be governed by clear conditions to limit this possibility to real, serious concerns

What is needed to facilitate the intra-EU waste shipments

Recommendations to the EC proposal

Multiple shipments (Art. 13)

- Offer sufficient flexibility on the points of exit and entry from a given country as changes may occur due to unforeseen circumstances and transport means/conditions.

Disagreement on the classification (Art. 28)

- Support the opinion of the country of destination as superior to the view of the dispatch country.
- Harmonise waste classification across Member States at the levels of:
 - waste / by-product / end-of-waste (WFD Art. 5 & 6)
 - hazardous / nonhazardous (→ objection to establishing contamination levels for the Green List entries)
- Set clear rules to distinguish between used goods and waste.

What is needed to facilitate the intra-EU waste shipments

Recommendations to the EC proposal

Waste for lab. analysis & experimental treatment (Art. 4, 18)

- Proposed 150 kg threshold is not sufficient for non-ferrous metals → 2-5 tonnes are considering metallurgical test purposes.
- Extend 1 day deadline to confirm receipt of a shipment to 3-5 (working) days.

Financial guarantee (Art. 7)

- Streamline the financial guarantee calculation by introducing a single EU calculation method that would result in reducing fees and admin burden.
- Assign feasible timeline to the publication on an implementing act, not only to the feasibility assessment step.
- Involve industry stakeholders in the process.

Green List (Annex III B)

- Allow new entries e.g. windows, doors, curtain walls, framing profiles and other aluminum elements to facilitate their recycling and to enhance the EU Circular Economy.



5. Wrap up

Waste shipments at 3 levels: key messages



Intra-EU shipments

- Strengthen the status of pre-consented facilities to achieve an effective fast-track procedure
- Harmonise waste classification across Member States (haz./non-hazardous)
- Effectively implement the EU e-system (EDI) for the exchange of documents & waste flow data.



Extra-EU shipments

- Ensure that waste sent for treatment outside the EU is treated according to Environmentally Sound Management (ESM) conditions, provenly equivalent to the EU ones

Import of waste to the EU

- Facilitate conditions for importing spent batteries and WEEE for recycling in the EU

Wrap-up

EU's 2050 climate-neutral economy will significantly increase metals demand

Facilitating high-quality treatment of waste is key to reinforce Europe's recycling leadership

Collect more, sort properly, prevent that metal-containing waste is discarded, improperly treated or illegally exported

Use the potential of the future EU product rules & waste legislation reviews to create optimal conditions (e.g. WFD, WSR, WEEE, ELV + ESPR)

WASTE = RESOURCES

THANK YOU

Kamila SLUPEK
Sustainability Director
slupek@eurometaux.be

 @Eurometaux

www.eurometaux.eu

Avenue de Tervueren 168, Box 13 | B-1150 Brussels | Tel: +32 (0) 2 775 63 11 | eurometaux@eurometaux.be

