How to improve EU waste flows for metals

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Two challenges many of us face in accessing secondary raw materials

**Issue?**
- No global level playing field for EU high-quality recyclers
- Barriers to waste shipments within EU

**Big idea?**
- Fully adopted standardised rules for high-quality recycling
- Fast-track procedure for pre-approved recyclers
Base metals: already top-of-class

High volumes + High value = High recycling rates

>95% buildings

>90% automotive

>60% packaging
Precious & technology metals: high potential...

Example: E-Waste

Filled with valuable metals!

≈ €1.5bn market revenue
...but still a lost opportunity in Europe

≈ \( \frac{1}{3} \)

E-waste recycled properly in Europe (2013) = 3.3 m tonnes

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\begin{align*}
\text{Recovered Value} & = 3.3 \text{ m tonnes} \\
\text{Lost Opportunity} & = 6.15 \text{ m tonnes}
\end{align*}
\]

Source: CWIT (2013)
Or to put it another way…

For every 1 tonne of e-waste Europe recycles, 2 tonnes are a lost opportunity.

Action is needed across the recycling value chain.
No global level playing field for high-quality recyclers
Our biggest competition is against low-quality recyclers

European state-of-the-art recycling facilities

Low-quality recyclers, in and out of Europe

Why is this a big problem?
Metals recycling… a world apart?

**High-quality treatment**
- Maximum number of metals & high yields
- Safe treatment of hazardous substances
- High environmental standards

**Low-quality treatment**
- Small number of metals & low yields
- Improper treatment of hazardous substances
- Lack of environmental standards

Al, Cu, Ni, Zn, Pb, Au, Ag, Pd, Pt, Rh, Ru, Ir, Co, Se, In, Te, Sb, Bi, As, Sn
Recycling quality impacts the market

High-quality recyclers

Low-quality recyclers

Higher operating costs ≠ Lower profit margins

Better prices for scrap ≠ No level playing field until all recyclers are at the same standard!
This is best illustrated by exports

- **15% of e-waste**: Mainly to West Africa and Asia
- **10% of aluminium scrap**: Mainly to Asia

But recycling capacity exists within Europe!
Recycling is a global market

BUT

Europe is exporting scrap metals we could and should be recycling...

…& we don’t know what happens to them

No EU Circular Economy until we know all European waste is recycled properly
No global level playing field…

What are we going to do about it?
Two long-term solutions

**Within Europe:**

1. Fully-adopted minimum quality standards for e-waste recyclers
   - A guarantee that companies are using high-quality processes

**Outside Europe:**

2. Requirement for exported EU waste to be recycled under equivalent conditions
   - Making sure minimum standards are applied to all EU e-waste
And how are we doing?

We’ve made the first steps…

1. Minimum EU standards adopted (CENELEC 50625)

2. Equiv. conditions in WEEE & WFD (in theory)

…But still a mountain to climb!

1. How can we ensure uptake of standard?

2. How can equiv. conditions work in practice?

We all want to achieve a Circular Economy
The shared question remains HOW?
2/2
Barriers to intra-EU waste shipments
We all benefit from faster and more efficient intra-EU waste shipments

Why so important for multi-metallic recyclers?

- Highly specialized operations
- Economies of scale crucial
- Not present in every Member State
- Cross-border transit is the norm
Transit barriers lower competitiveness of EU high-quality recyclers

• **IF** Europe wants to increase its competitiveness on a global level …

• **IF** EU policymakers want the non-ferrous metals industry to contribute more strongly to a Circular Economy

• **THEN** we need to make it *simpler* and *faster* to transport waste across Europe

Better intra-EU waste transport = Better EU Circular Economy = Better EU competitiveness
Two key barriers to EU waste shipments

1. Burdensome administrative procedures for transporting hazardous waste

Prior notification for each shipment
- Out-of-date paper forms
- Differing requirements per Member State

Transit countries
- Tacit consent after 30 days
- Multiple countries = big delays

Pre-consented recovery facilities
- Pre-confirmation of audited recyclers to speed-up admin
- But shorter 7 day notification period not complied with

Re. EU Waste Shipment Regulation – Articles 8-12
Two key barriers to EU waste shipments

2. Lack of harmonised definitions

Waste codes & classifications - not harmonised across Member States

= Unpredictability and delays for waste shipments

Some real-life examples:

Hazardous or not?

“Electronic Scrap”

Byproducts or waste?

“Anode slimes” (containing precious metals)
Consequences for high-quality EU recyclers

Admin burdens + Differing requirements = competitiveness vs non-EU
2/2
How to streamline EU shipments to high-quality recyclers?
Our primary solution:
Fix pre-consented recovery facilities status

Current procedure: 7 steps for each shipment, even for pre-consented recyclers:

1. Notification file to competent authority
2. Acknowledgement and request for extra info
3. Competent authority final decision
4. Supplier pre-notice
5. Transboundary transport
6. Recycler confirms receipt of waste
7. Recycler confirms recycling of waste

TOTAL: 1 month minimum, up to 3+
Instead, why not introduce a fast-track procedure for pre-consented recyclers?

**Audits = guarantee of safe recycling for hazardous waste**

→ 3 simple steps, cutting time and paperwork:

*No need to notify Competent Authority for every shipment*

1. Supplier pre-notice 3 days
2. Transboundary transport
3. Recycler confirms receipt of waste Within 3 days

**TOTAL: Less than a week!**
Key Principle

WASTE FOR PRE-APPROVED RECYCLERS = SHIP IMMEDIATELY

Direct facilitation of an EU Circular Economy
Wrap-up and looking ahead
The time is now to take action

Now
Challenges

Lack of
global level
playing field

Barriers to
trade of waste
in Europe

By 2020
Opportunities

Review of
Waste
Shipments
Regulation

Circular
Economy
Action Plan

CAN WE TURN IDEAS INTO ACTION?
**Our ideas:**

- Fully adopted standardized rules for high-quality recycling
- Immediate waste shipments for pre-approved recyclers

*Mountain can only be climbed together*

- Big ideas, not easy ideas
- Solutions must be smart
- Value chain collaboration is key

- Recycling value chain
- OEMs/takeback schemes
- Regulators
THANK YOU

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