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## RECYCLING FOR A RESOURCE EFFICIENT EU ECONOMY

With this position paper, the undersigning recycling sectors would like to explain the functioning of the recycling value chain and the challenges which the recycling sectors face today. They make concrete proposals for policies that would be needed to optimise the functioning of the recycling chains and thereby their contribution to a resource efficient Europe.

Recycling is more than the collection of recyclable waste materials. It is the result of a series of steps which are part of the recycling value chain: collection - pre-processing (including when appropriate dismantling) – processing (including extraction of contained material from recyclable waste) into a new product/material.

Europe has come a long way to improve its recycling rates and has thereby reduced landfilling of waste. More recycling can be achieved provided the appropriate framework conditions are in place.

But European Industries using secondary raw materials face important challenges. The obstacles to producing a higher share of paper, plastic, man-made fibre, non-ferrous metals products from secondary raw materials are the following:

- Insufficient and contradictory policy support for closing the loops
- subsidies for the use of recyclable and renewable material for energy recovery
- Insufficient recyclability requirements for converted products
- Suboptimal end-of-life collection schemes
- Shortage of secondary raw material due to exports to non-European countries partly due to illegal shipments of waste
- Lack of level playing field worldwide
- Technological hurdles to recycle increasingly complex products
- Landfilling of recyclable waste
- Inconsistencies in legislation in the field of waste, products and materials

The challenges for the different sectors are multiple; one of them however is a threat to the entire European Recycling Industry: the massive exports of secondary raw materials outside the EU. Secondary raw materials exported outside the EU represent not only a loss of the material (often poor efficiency of the recovery process) but also a loss of the embedded energy. Additionally, exports of wastes and secondary raw materials may lead to a higher environmental burden in a global perspective. The significant exports of European secondary raw materials are facilitated by:

- a strong demand for resources from emerging markets
- relatively cheap east bound shipping costs
- substandard environmental management of recycling processes outside Europe
- insufficient control at borders
- lack of quality of the collected material.

In the undersigning sectors' view, excessive exports of secondary raw materials are in opposition to the European Union's objective of a resource efficient Europe.



## Concrete proposals for policies needed to optimise recycling industries' contribution to a resource efficient Europe

To optimise recycling in Europe from our current levels, targeted policies are needed. To enable the European industries using secondary raw materials to recycle even more, to take account of the full value chains and to close the recycling loops, the undersigning European recycling industry sectors:

- call for a sound implementation and enforcement of existing legislation.
- call for better enforcement of the Waste Shipment Regulation with a view to curbing illegal shipments of waste. The work of Impel and customs authorities should be supported, e.g. through a distinction of second-hand goods and new goods.
- call for separate collection at source of paper, metal, plastics and glass by 2015 for all applications
- call on the European Commission to propose a ban on landfilling of recyclable waste.
- call on the European Commission to include recyclability criteria for the product groups covered by the eco-design directive today and product groups that might be covered in the future.
- call for actions to ensure that pre-processing and recycling takes place in efficient facilities rather than in sub-standard facilities to achieve material quality.
- call on the European Commission to stimulate producer responsibility and explore new concepts or tools in full cooperation with the stakeholders concerned so as to avoid a shift in impact and ensure that the instrument delivers.
- call on the European Commission to investigate the substantial subsidies given by some third countries, such as China, to secondary raw materials using companies with respect to their compatibility with WTO rules and take appropriate measures.
- remind that requirements such as recycled content should be considered cautiously as a general tool, as they may lead to inefficiencies in the supply chains. However, they can be an effective tool in specific sectors.
- call for a recycling strategy aiming at recycling secondary raw materials with the highest material quality and efficiency and close to the source when appropriate.
- call for effective recognition of the benefits of recycling in other policies than waste policy, such as the energy policy.
- call for adjustment of policies and legislation to avoid inconsistencies hindering recycling

Recycling is a key driver for resource efficiency. To optimise recycling in Europe from our current levels, targeted policies are needed. The proposals listed above would enable the European industries using secondary raw materials to recycle even more, thereby supporting the full value chains, closing the recycling loops and contributing to the EU 2020 targets and the objective of a resource efficient Europe.



**For more information:** The full position paper explaining the concrete policy proposals, including a description of the supply chains and information of the undersigning recycling sectors can be obtained from:

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