

December 2016

# Waste Framework Directive: European material industries renew call for measurement of real recycling rates

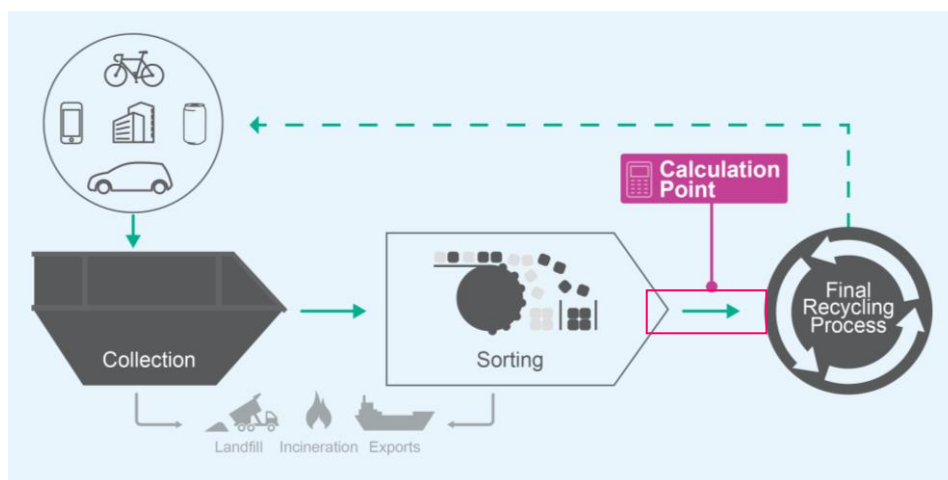
## Introduction

Europe's metals, steel and paper industries renew their call for a harmonised method to measure recycling rates at input into the 'final recycling process', so as to promote material recovery and thus quality recycling. We support the European Commission and European Parliament proposals on this subject.

Our sectors believe that measurement at input to the final recycling process *is* achievable. It requires that regulators and industry work together over the next five years to set-up robust traceability systems, which build on existing industry schemes.

In Europe, Member States use different methods for calculating national recycling rates, making comparison difficult. Some base their calculations on waste collected or sorted, while much of that waste will still be incinerated, landfilled or exported without guarantee of proper treatment.

In a true circular economy, materials in products should be properly recovered and recycled, for use in new product life-cycles. The Commission's proposal to measure real recycling rates across all Member States is an important step to promote material recovery and guarantee its supply into the 'final recycling process'.



## Why measure at input into the final recycling process?

Measuring recycling rates at input into the final recycling process has the following benefits:

- **Promoting quality recycling of waste and end-of-life products**, by avoiding that the collected and sorted waste which gets landfilled, incinerated or exported is counted as recycled
- **Identifying a final recycling step**, where material is recovered from waste and is able to substitute primary material in a new product life-cycle. All actors of the recycling value chain make key contributions to the reprocessing of waste into products or materials. Recycling rates should measure the true rate of material recovered from waste.
- **Allowing a benchmark of progress**, by implementing a harmonised method for all Member States (although some might now have more difficulty achieving recycling targets)

### **Why measuring at input to the final process is achievable**

- **The Circular Economy Package is an ambitious step-change for Europe.** We should look to improve current practices. Setting-up robust traceability systems is an integral component, which will allow for accurate measurement of real recycling rates.
- **Across EU materials sectors, there are several examples where information is *already* reported through the value chain until the point of final recycling:**
  - Paper - **Recovered Paper Identification System** – Enables the identification of supplier and paper grade throughout full paper recycling value chain
  - WEEE – **WF-Rep Tool** – Allows for monitoring of the whole WEEE treatment chain up to final recycling process
  - Packaging – **UK PRN Scheme (EPR)** – Ensures traceability from scrap recovery to final recycling, with detailed reporting
  - Plastics - **EuCertPlas** – Certification of plastics recycling companies, which includes traceability requirements and mass/balance reporting
- **Further work is needed to differentiate municipal, commercial and industrial sources, but the basic framework is in place in the examples above.** Our sectors believe it is feasible to adapt the existing schemes to allow approximation of the waste source, and to set-up new schemes for those waste streams where reporting does not already happen.
- **After the Waste Framework Directive enters into force, Member States will still have 5 years to build on the existing examples and set-up improved traceability systems for municipal waste streams.** Our sectors are ready to support that effort.

### **Our call**

During their review of EU waste legislation, MEPs and Member States should safeguard the European Commission's proposal for measuring real recycling rates at input to the final recycling process. This is an essential step to promoting quality recycling across European sectors.

Regulators and industry will then need to work together to set-up robust traceability systems for recording input to the final recycling process.

### **Annex – How are different sectors structured?**

*It is important to note that in some sectors, the same operator conducts multiple steps in the recycling value chain; for example both the sorting and the final recycling step. In others, each step is conducted by a different operator.*

*This has no influence on where to measure the recycling rate (which should always be conducted at input into the operation that will allow for substitution of the primary material). For that reason, our model of the recycling value chain can be applied across all waste streams.*



**Eurometaux**  
European Association of Metals



**EUROFER**  
The European Steel Association

### **About CEPI**

The Confederation of European Paper Industries (CEPI) represents 505 pulp, paper and board producing companies across Europe and 920 paper mills. The sector uses a renewable resource, wood, from sustainably-managed forests as well as paper for recycling as its raw material. With a recycling rate of 72% (2015), we are a strong contributor to the circular economy and the bioeconomy.

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### **About Eurometaux**

Eurometaux is the decisive voice of non-ferrous metals producers and recyclers in Europe. With an annual turnover of €120bn, our members represent an essential industry for European society that businesses in almost every sector depend on. Together, we are leading Europe towards a more circular future through the endlessly recyclable potential of metals.

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### **About Eurofer**

The European Steel Association (EUROFER) is located in Brussels and was founded in 1976. It represents the entirety of steel production in the European Union. EUROFER members are steel companies and national steel federations throughout the EU. The major steel companies and national steel federations in Switzerland and Turkey are associate members.

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