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# Eurometaux responses to Public Consultations on Circular Economy and Functioning of Waste Markets

## Introduction

Eurometaux, the European non-ferrous metals association, has submitted responses to the European Commission's Public Consultations on the Circular Economy and on the functioning of EU waste markets.

Given the intrinsic value and recyclability of non-ferrous metals, innovative solutions have been developed to recover a range of metals from end-of-life products, waste and industrial by-products. However, to further boost the circular management of metals in Europe, a systemic approach is needed to address recycling challenges.

Eurometaux considers that the overarching objective of both cases should be to maximize the recovery of valuable materials from waste and end-of-life products. Or in other words, to move from "waste management" to "resources management".

To boost the circular management of metals, Eurometaux recommends:

1. **Product design:** Implement generic EU regulatory requirements on recyclability in product design (design for recycling), with a flexible approach to implementation for each product group. Avoid taking a "recycled content" approach which is not effective for metals.
2. **Collection:** Implement separate collection of waste streams at their source.
3. **Extended Producer Responsibility:** Apply minimum operating conditions for Extended Producer Responsibility (EPR) schemes, adopting the principles of shared responsibility, transparency and accountability.
4. **Targets:** Adopt ambitious but pragmatic waste recycling targets, and a harmonized calculation method (i.e. at the input into the preparation for material recovery plant). For some waste streams, the targets should be complemented by standards for quality treatment.
5. **Value focus:** Take a product-centric approach to evaluate efficient and feasible options for recovering the most valuable and critical materials from end-of-life products
6. **Certification:** Establish a mandatory EU certification scheme applicable to certain waste streams (e.g. WEEE and batteries), in order to provide the required framework for quality recycling of EU scrap.
7. **Illegal exports:** Implement measures to improve control at borders, in order to minimise illegal exports of waste
8. **Landfill:** Introduce a progressive landfill ban on recyclable post-consumer goods
9. **End-of-Waste** Secure regular monitoring of end-of-waste export flows
10. **Chemicals:** Ensure that legislation on chemicals considers at an early stage the socio-economic benefits of recycling, and adopts a risk-based approach.
11. **Innovation:** Provide increased funding for circular economy innovation and R&D projects, in particular supporting the recycling of increasingly complex products.

Further details are provided in [Eurometaux's submission to the European Commission's Circular Economy consultation.](#)



Eurometaux recommends to facilitate the trade of by-products, waste & end-of-life products to quality treatment facilities through:

1. **Waste definitions:** Harmonised definitions of waste and by-products across Member States
2. **Waste codes:** Uniform use of the EURAL waste codes in Europe (no national codes).
3. **Waste shipments:** Improve the “pre-consented facilities” status to facilitate waste shipments to quality facilities while avoiding weakened controls. The improved status would be valid for three years minimum (possibly more) and would allow notification electronically and the possibility to transport the waste upon notification. The status should be linked to a registration number facilitating notification and tracking by authorities.
4. **Cooperation:** Increased cooperation between authorities in different Member States.

Further details are provided in [Eurometaux’s submission to the European Commission’s consultation on the Functioning of EU Waste Markets](#)

### Annex: The Metals Value Chain

