

EAA Position Paper on the EU Waste legislation

In view of the of the EU Waste legislation revision incl. the Waste Framework Directive, the Landfill Directive and the Packaging and Packaging Waste Directive

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Because of its high scrap value, the recycling of aluminium is economically viable and helps to reduce and even offset the extra investment costs of collection and sorting. Europe is a worldwide leader in the recycling of aluminium and to further increase recycling rates, scrap must remain as much as possible in Europe. EAA and its member companies wish to highlight the following key drivers that are needed to achieve this objective.

The main goal of the European waste legislation should be to promote the circular economy, making sure that our material stays in a closed recycling loop and thus remains available to our societies, contributing to a more resource efficient Europe.

In order to achieve this, the European Aluminium Association strongly recommends focusing on the following six key measures:

- **More ambitious recycling targets**, guaranteeing a level playing field between materials and products. An important condition for this is to promote a **gradual phasing out of landfill** of end-use recyclable goods. Waste should always be pre-treated before it is sent for landfill;
- **Better collection and sorting for recycling**, guaranteeing the generation of high quality scrap ready for remelting into new valuable end-use products. This requires in particular investments in more and better collection and sorting by promoting the uptake of existing separation **technologies** such as eddy currents and sink-float, but also developing further innovative separation technologies like sensor-based sorting, for all waste streams containing aluminium. Furthermore, improvement of **design for dismantling or design for recycling** of end-use products should be further investigated, to avoid that we make unnecessary costs at the 'end of the pipeline' in separating the various materials. In those respects the use of EU R&D and regional funds as well as of tax incentives should be promoted;

- **Better and transparent reporting** to and by Eurostat about the national recovery and recycling results focusing on actual recycling instead of 'collection for recycling'. In this respect it is strongly recommended that the materials allow for **third party verification**, like aluminium is already doing for their rigid metal packaging recycling results;
- **Better definitions of recycling** making a clear distinction between endless material recycling in a closed material loop and recycling which ultimately results into the degradation of the collected materials. EAA also calls - alongside other materials which claim to be fully renewable, biodegradable or reusable - for the recognition of aluminium as a '**permanent material**'. Regardless the number of recycling loops the material's physical properties never change;
- **Better monitoring the export of metal scrap** to other world regions, in order to trace material leaving Europe and to identify poor recycling practices in third countries. Therefore it might be helpful to develop and implement a global certification system for scrap remelting facilities, which respect similar safety, health and environmental conditions as in Europe;
- **The application of the correct Life-Cycle-Assessment methodologies** to better assess the environmental impacts of materials and fully recognize the end-of-life recycling credentials of metal products. In view of the current discussions on environmental footprint calculation methodologies, it is strongly recommended that the so-called 'End-of-Life' recycling method is being used for metals, instead of the 'Recycled Content' approach.

The Aluminium industry is an essential part of a resource efficient Europe

The aluminium industry is pro-actively contributing to a more resource efficient Europe by focusing on two of the most important steps of the waste management hierarchy as described in the EU Waste Framework Directive (WFD): prevention and recycling. By using less and lighter materials such as aluminium and by recycling it again and again without any loss of quality the aluminium industry helps its customers, consumers and the society at large to save resources and to prevent wastage of highly valuable materials.

Aluminium is a material with permanent characteristics that contributes to resource efficiency. Due to its unique properties - lightweight, flexibility, excellent electrical conductivity, strength, extreme resistance to corrosion, total barrier against light and moisture, endless recyclability - aluminium is a material that helps to save more resources than are needed to produce it. The durability of the material means that 75% of the aluminium ever produced is still in use. With impressive End-of-Life recycling rates of over 90% in transport and construction applications, and about 60% in packaging aluminium is the material of choice for a wide range of innovative and sustainable product applications. The aluminium industry is working towards even more efficient recycling through enhanced product design and by ever improved efficiency in aluminium recovery processes. As a result more than half of all the aluminium currently produced in the EU27 originates from recycled raw materials and there is room for further improvement providing that our partners also contribute to more efficient collection, sorting and recycling of used aluminium. In view of growing end-use demand and a lack of sufficient domestic primary aluminium production in this part of the world, Europe has a huge stake in maximizing the collection of all available aluminium and developing the most resource-efficient scrap treatments and melting processes. This strategy should be coupled with measures to support the recovery of the primary's segment competitiveness as primary metal is needed to satisfy growing demand – considering also the long life-span of some applications (e.g. in building) – and secure the crucial links between the various parts of the aluminium industry value chain (from primary production to semi-fabricated products and finally recycling and reuse of the material for the next life cycle).

A sustainable and valuable activity in Europe: Aluminium scrap has considerable market value because the energy needed for primary production is stored, to a large extent, in the metal itself and, consequently, in the scrap too. On top, the energy needed to melt aluminium scrap is only a fraction (5%) of that required for primary aluminium production. Aluminium's unique recycling potential and intrinsic value means that it is one of the most cost-efficient materials to recycle, with relatively short pay-back times on investments in innovative sorting and recycling technologies. The aluminium industry is constantly developing and refining its recovery processes in order to find the best recycling options.