

Joint Ferrous and Non-Ferrous Metals Position Paper



Calculation methodology and reporting for metals recycling rates: Joint recommendations for continued ambition

18 December 2018. Europe's ferrous and non-ferrous metals industries fully support the European Commission's ongoing work to develop implementing acts on the rules for calculating recycling rates for municipal and packaging waste, and on the reporting framework for Member States. In this paper we provide three recommendations to aid this work.

We would be pleased to discuss these recommendations further and provide our continued expertise.

1. Maintain an ambitious and comparable calculation point for metals

Europe's ferrous and non-ferrous metals industries fully support the European Commission's ongoing work to develop implementing acts on the rules for calculating recycling rates for municipal and packaging waste. An ambitious and comparable calculation point is required to improve the accuracy of Member State recycling rates and facilitate investments into improved collection and sorting.

We encourage the European Commission and other stakeholders to reflect the ambition of the finalised Waste Framework Directive (WFD) and Packaging and Packaging Waste Directive (PPWD) in the implementing acts on municipal and packaging waste. All Member States should aspire to measure at the input to the "recycling operation whereby waste materials are actually reprocessed into products, materials or substances". In our sector, this recycling operation takes place in the metals smelter or furnace.

The derogation contained in Article 11a paragraph 2 of the WFD already allows Member States the necessary flexibility to measure at the output of any sorting operation while estimating losses. Given this additional flexibility, it is essential that the primary calculation point is set accurately at the input to the final stage of recycling for metals and other materials.

- ***Our recommendation: For both ferrous and non-ferrous metals, the calculation point should be set at the entry to the metals' smelter or furnace, after completion of all preliminary sorting operations.***

2. Ensure that ferrous metals and aluminium packaging recycling rates are reported separately

The Packaging and Packaging Waste Directive includes split recycling targets for ferrous metals and aluminium packaging. The Waste Framework Directive only requires Member States to report on recycling rates for metals in general. The European Commission should make this difference clear in their respective implementing acts on municipal and packaging waste (calculation method and reporting framework).

- ***Our recommendation: All relevant implementing acts on the Packaging & Packaging Waste Directive should reflect clearly that ferrous metals and aluminium packaging recycling targets are to be reported separately***

3. Provide clarity and pragmatism on composite packaging

Reporting of recycling rates of composite packaging and packaging composed of multiple materials should be done accordingly to the pre-dominant material principle, as laid down in the Packaging & Packaging Waste Directive. As there are no specific EU recycling targets tabled for composite packaging, the dominant material in such multiple material packaging solutions should be taken as the basis of the reporting, unless a specific component such as a ferrous crown cork or an aluminium closure on a glass bottle can be **manually removed** and therefore has to be declared separately within Extended Producer Responsibility schemes as being recycled.

- ***Our recommendation: There is no general legal requirement that the recycling of composite packaging and other packaging composed of more than one material shall be reported per material contained in the packaging, unless the different components are easily separable. In all other cases the reporting should be done via the pre-dominant material component.***

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