

EUROFER PRIORITIES FOR THE “NEW CIRCULAR ECONOMY ACTION PLAN” TO INCREASE RECYCLING AND REUSE OF PRODUCTS IN THE EU

The European Steel Association, EUROFER, welcomes the Roadmap “New circular economy action plan”. Steel plays a vital role as an enabler for transitioning to a CO₂ neutral and circular economy. The fact that steel maintains its inherent properties, through multiple recycling loops, means it remains permanently available to the society. However, there are still some aspects of policy that fail to recognise and limit our contribution to a more circular economy. The main issues and proposed solutions are summarised below and further detailed in the attached paper sent to the open feedback consultation by the EU Commission.

Sustainable Steel Products Policy

- EU Product law has to assess products with sustainability in mind (economy, society and environment). Environmental assessment methods alone may not eliminate trade-offs and unintended consequences.
- Focus on product design requirements by targeting re-usability, high quality recyclability, durability and demountability.
- The environmental attributes of products have to be assessed using a consistent, robust cradle-to-cradle LCA-based methodology.
- The Eco-Design directive and other product policies need to align to the principles listed above.

Reduce Waste Generation, use of by-products and toxic-free

- Toxic-free strategies must focus on Substances of Very High Concern and work to reduce the exposure of risk, and not the content of hazardous substances, to enable circularity.
- Process-related waste and by-products follow the production rate. Their generation is sometimes linked to the abatement of pollution (IED & BAT) and they can still be recovered or recycled. The reduction of waste generation should rather focus on product design for high quality recyclability and reduce low quality (more linear) recycling outcomes at end of life.
- Use of by-products (e.g. slags which are manufactured material) will prevent ‘waste generation’ and can substitute virgin raw materials.
- The use of by-products, end-of-waste or waste has to be equally supported, irrespectively of their legal status.
- Statistics on use of by-products, end-of-waste, and waste, re-use and/ recycling has to be collected for monitoring the progresses

A well-functioning and integrated internal market for secondary raw materials and by-products

- An integrated market of the secondary raw materials AND by-products must prevent the fragmented interpretation and implementation of EU law. EUROFER recommends harmonising the implementation of the new EU Waste law in order to maximise its positive impact. EU-wide criteria for by-products and end-of-waste materials is critical.
- Use of materials, including by-products (e.g. manufactured aggregates), in a circular economy should be determined by their functionality, and subject to the same standard specifications used for virgin materials, rather than their legal status. See for example EN 12620 or 13042/42

- There is an untapped potential for circular economy, via a wider use of the by-products. Markets for by-products can be supported by imposing an alternative material-content measure in e.g. public procurement.

To increase the amount of waste treated domestically

- Waste that has had insufficient treatment is a factor that reduces recycling options in EU, due to high quality requirements of reprocessors.
- To introduce a WTO-compatible export measure functional to maintain the ferrous scrap within the EU and to increase the scrap quality to the highest standards needed by the steel sector for cutting its CO₂ emissions and becoming even more circular.
- Other initiatives for tackling the issue of improving the quality of the ferrous scrap should focus on including the implementation of the BREF waste treatment document and the definition of quality standards.

Consistency and coherency surrounding the Green Deal

- The roadmap and its related actions need to be consistent and inclusive with all the different dossiers that are related to the EU Green Deal, that act transversally on many aspects of the EU industry. Therefore, it is important to assess the coherence with climate policy, toxic-free/zero-pollution strategy, chemicals strategy and the Industrial Emission Directive, in order to avoid that two different regulations act in opposite directions.