

European recyclers warn restricting the export of raw materials could end the circular economy and disrupt Green Deal ambitions

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Nearly 300 European national federations and companies from the recycling industry have issued a powerful warning to European Union leaders over the potentially disastrous effects of a blanket restriction on exports of Raw Materials from Recycling (RMR) in the upcoming Waste Shipment Regulation (WSR).

RMR are currently labelled as non-hazardous waste under EU law and would therefore be impacted by any regulation that issues a blanket ban on waste.

In fact, RMR are not waste but high-quality commodities with a green carbon footprint. They are materials recovered from old products that go into making new ones and as such are an essential component of Europe's - and the international community's - circular economy.

Addressed to the Executives of the European Commission, the European Parliament and the Slovenian Presidency of the Council, the letter calls for a clear distinction in the legal regime between "problematic waste streams" and RMR, meeting quality specifications.

While European recyclers entirely support restrictions on exporting unprocessed waste, like electronic waste and end-of-life cars, to places that lack infrastructure for proper treatment, RMR that can be used to substitute extracted raw materials should not be made subject to rules equivalent to export restrictions.

"RMR are intrinsically climate-friendly and circular materials, which are priced and traded globally as commodities. European recyclers are supplying quality materials to both the European industry and globally. Subjecting RMR - which are still classified as non-hazardous waste - to export restrictions will pose a vital threat to European recyclers, be them SMEs or large multinational companies, in the absence of secured end-markets for circular materials in the EU. They will result in massive green job cuts and put a lasting brake on the growth of one of the most dynamic industries in Europe, for no environmental gains. Worse still, with unhampered imports of extracted raw materials in Europe, the competitiveness of RMR will drop and thus the incentive to properly collect, recycle, and invest will be lost, putting at risk the ability to achieve present recycling targets set by legislation", stressed Cinzia Vezzosi, President of EuRIC.

With only 12% of raw materials used coming from recycling, the EU's industry remains mostly linear, as opposed to circular, **the co-signatories urge the EU to ensure that:**

- 1. Export restrictions foreseen in the revised WSR solely target problematic waste streams:** a “one-size-fits-all” solution whereby no distinction is made between untreated problematic waste streams and RMR that can be used directly in circular value chains will run against the very objectives of the EU Green Deal;
- 2. Free and fair trade of RMR, which is essential to the competitiveness of the European recycling industry, is upheld:** restricting exports of raw materials meeting quality specifications based on their waste classification will significantly impact the competitiveness of the European recycling industry;
- 3. A stable legislative framework with a proper classification for RMR and incentives is implemented to reward the environmental benefits of circular materials and mandate their use in products.**