

POSITION PAPER regarding critical raw materials in waste streams

Commission Implementing Regulation listing the products, components and waste streams considered as having a relevant critical raw materials recovery potential under Regulation (EU) 2024/1252

The proposed implementing regulation with its goal of recovery more critical raw materials in the Union is in principle to be supported and welcomed by the Non-ferrous Metals industry. Recycling is an inherent part of it and circular economy is lived by our industry for thousands of years. But there are some points we would like to shed some light on for a more successful implementation.

1. Avoid additional Reporting Duties

The List should be set up in a way that avoids another reporting duty to the companies. The Omnibus-Reforms are necessary due to the already existent overburden of overreporting. In light of that, implementing a new burden would be counterproductive and lessen acceptance by the companies towards the entire Green Transition Project.

2. Connect with existing Green Deal Legislation

Given the Critical Raw Materials Act, it's crucial to ensure strong connections with existing **Circular Economy** legislation. This includes the Battery Regulation, the upcoming ELV Regulation, the WEE, the Ecodesign Regulation, the Waste Shipment Regulation and the Waste Framework Directive. There is potential in all of these pieces of legislation to support the goal of recovering critical raw materials, and some are already to an extent actively supporting this goal. The connection between these regulations shouldn't just be nominal; it needs to be explicitly integrated into their texts. Thus, the different pieces should be updated in their respective review to actively support the recovery of critical raw materials even more than they are doing today. They should connect with a goal in mind to support circular economy, including on the resource-input side.

3. Fostering the Waste Shipment within the Union

An example of how to proceed with Point 2 might be the Waste Shipment Regulation. To foster the recovery of critical raw materials to its full potential, it needs better and easier waste shipment within the Union. Some Critical raw materials are often metals which occur only in minor concentrations and weights in products and the resulting waste material. It's not feasible to have waste treatment facilities in each Member country of the Union specialised in recovering each single material. Thus, an easy and efficient system across the Union is the way to go to achieve the goal. In conclusion, the limitations of waste shipment within the Union should be as low as possible.

SUGGESTIONS FOR OPTIMIZING THE PROPOSAL

Avoid additional reporting Duties

Connect with existing Green Deal Legislation

Fostering the Waste Shipment within the Union

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