

## **EUROMETREC POSITION ON ACCESS TO SECONDARY RAW MATERIALS**

### **Introduction**

1. EUROMETREC members are national trade organisations and federations in the EU Member States representing the interests of commercial firms that are involved in primary and secondary metals. More than one thousand small, medium and large sized companies in the EU member states are represented by EUROMETREC. They are involved in the collection, transport, trade, processing and recycling of non-ferrous metal scrap.
  
2. EUROMETREC's main objectives are:
  - To establish permanent liaison between the national member federations and the European institutions (the Commission, Parliament and Council, etc.) and with organisations inside and outside the EU;
  - To ensure a permanent link between the national member associations of the EU Member States;
  - To ensure proper representation of the member associations and of the non-ferrous metal trade and recycling in order to promote non-ferrous metals trading and recycling, the use of secondary non-ferrous metals and encourage free and fair trade of their commodities.
  - To gather, exchange and disseminate all information relevant to these objectives.
  - More particularly, EUROMETREC's objective is to give the scrap processing and recycling sector an appropriately pivotal role in all future EU environmental protection and recycling programmes. It reflects the opinion of the EU non-ferrous metals recycling industry in its position papers and participates actively in the drafting of any EU legislation which could have an impact on the non-ferrous metals recovery and recycling sector.
  
3. EUROMETREC members conserve natural resources and protect the environment. They annually divert from the so-called waste stream hundreds of thousands of tons of scrap which they collect, process and trade in as valuable raw materials to supply national, EU based or third-countries consumers:

The estimated energy savings by manufacturing products with non-ferrous metals scrap are:

95% - aluminium, 70% - copper, 80% - lead, 75% - zinc.

The estimate average percentage of non-ferrous metals scrap which are used in the overall production of non-ferrous metals in the EU is:  
35% - aluminium, 42% - copper, 60% - lead, 35% - zinc

### **The need for Free and Fair Trade in an international market**

A major objective of EUROMETREC is to defend free and fair trade of all its members' commodities. Like most other primary and secondary raw materials, non-ferrous metals scrap is traded internationally. Worldwide movements and prices of non-ferrous metals scrap fluctuate according to many variables: price of primary metals and ores for which scrap are vital substitutes, existing production capacities, consumers demand, quotations on the metal exchanges in London or New York, currency exchange rates, processing and labour costs, freight costs, etc....

As a responsible trade and recycling organisation in the EU, EUROMETREC supports all other industry associations and trading groups which advocate free and fair trade and the free movements of primary and secondary metals.

EUROMETREC will join forces and participate in common position statements and to present them to all governmental institutions which are responsible for the free and fair trade of our commodities.

In fact, EUROMETREC's basic principles as a European trade organisation is to oppose any initiative or position statement aimed at protecting one region or one country's interest against another by the implementation of any kind of barriers to trade.

EUROMETREC will strongly oppose any attempt from the part of a governmental body or of an industry group in any member state or outside the EU to appeal to environmental or trade legislation to protect its market.

The abuse of environmental legislation to redress fiscal measures cannot be supported; besides this type of instrument is unlikely to be effective in the short or medium term and will be difficult or impossible to remove or adjust in trying to redress any trade imbalance. EUROMETREC would consider supporting actions, at EU level or at the WTO, specifically targeted to remove any export duties on scrap metals or to remove the refund of import sales taxes on scrap metal imports or any similar measures which restrict free and fair trade.