

Nickel Institute Position Paper EU Communication «Towards a circular economy: A zero waste programme for Europe »

September 2014

The EU Communication “*Towards a Circular Economy*” published in July 2014 ([COM 2014 398 final](#)) promotes a coherent EU framework to stimulate a circular economy by boosting recycling while creating jobs and economic growth.

The Nickel Institute welcomes the European Commission’s package on Circular Economy and stresses its support of resource efficiency as well as re-use, recycling and recovery. Nickel is highly recyclable and can be fully recovered and recycled and reused without loss of quality. Nickel is, and will be, an essential element to achieve a resource and energy efficient Europe. Examples are nickel-containing stainless steel scrap being turned into new stainless steel or nickel from recycled batteries going into stainless steel.

The Nickel Institute believes that the European Commission’s Circular Economy Package includes a number of powerful messages and introduces essential concepts such as the progressive landfill ban on recyclable waste, better reporting of data, new requirements on waste exports to fight illegal shipments and the link between innovation and ambitious recycling targets.

There are however points which the Nickel Institute would like to highlight:

- The Nickel Institute underlines the importance of a **realistic circular economy which takes into consideration a scientifically sound approach and full life cycle thinking. Secondary raw materials cannot meet on their own the constantly increasing demands for raw materials of a sustainable economy.** Supply of raw materials from primary sources will continue to play a significant role.
- It is essential, for our future, to ensure a balance between **identifying and putting in place the best outcome for the environment whilst maintaining business competitiveness** to achieve a European Industrial Renaissance.
- The Nickel Institute advocates the **proper management of waste streams**. However, we do not support the emphasis on hazardous materials or end-of-waste specific criteria as there are other pieces of legislation such as REACH, RoHS and WEEE that provide an adequate framework for the safe use, production and end of life management of chemicals. **Furthermore, the circular economy approach advocates reducing the use of materials which are hazardous thus opting for substitution. However, this approach ignores that some of those substances have properties that are critical to the development of resource efficient products and innovative technologies.** The restriction of such substances would greatly affect the whole value

chain in Europe, namely the downstream users and end users markets, hampering innovation and competitiveness of EU businesses.

- Setting of a **resource productivity headline target** (measured by GDP relative to Raw Material Consumption) in the context of the review of the Europe2020 Strategy is a matter of concern for the Nickel Institute. Such an indicator only **reflects the material use and not the resource efficiency throughout the life cycle of the products**. To illustrate this, nickel is mainly used as an alloying element in stainless steels thus allowing for a very long lifetime and low maintenance needs. Two examples:
 - The stainless steel façade of the Chrysler building in New York, built in the late 1920s, has undergone cleaning only twice in the last 90 years and no major maintenance is required due to the high quality of the stainless steel. This building is designed to last for several more decades.
 - The Progreso Pier on the Yucatan Peninsula in Mexico was built in the 1940s. Thanks to the use of nickel containing stainless steel rebar there was no need for maintenance, despite the fact that the Pier is continuously exposed to a very aggressive salt water environment.

In conclusion, the Nickel Institute is certain that if these points are taken into consideration in any future measures, we will be successful in moving towards a Circular Economy Europe with pragmatic and achievable goals.

About the Nickel Institute

The Nickel Institute is the global association of the world's primary nickel producers who together account for approximately 85% of worldwide annual nickel production outside China. Our mission is to promote and support the use of nickel in appropriate applications. NI grows and supports markets for new and existing nickel applications including stainless steel; and promotes sound science, risk management, and socio-economic benefit as the basis for public policy and regulation. Through our science division NiPERA (www.nipera.org), we also undertake leading edge scientific research relevant to human health and the environment. NI is the centre of excellence for information on nickel and nickel-containing products and has offices in Asia, Europe and North America. For more information see <http://www.nickelinstitute.org>.

