EU Communication «Towards a circular economy: A zero waste programme for Europe»

Q1. What is The Nickel Institute's response generally towards the European Commission's Communication?

The Nickel Institute welcomes the European Commission's Communication «Towards a circular economy: A zero waste programme for Europe». This initiative will be a significant contribution towards resource efficiency, re-use, recycling as well as generating growth and jobs.

Q2. What role can nickel play in the drive towards zero waste and a resource efficient Europe?

Nickel is fully recyclable – as other metals and alloys it can be entirely recovered and recycled and returned to their original state or to a different but still valuable state. Nickel will continue to be an essential element towards achieving a resource and energy efficient Europe. One example is nickel-containing stainless steel scrap being turned into new stainless steel ('same to same'); or nickel from recycled batteries being used for the production of new nickel-containing stainless steel ('former use to new form').

Q3. How can the EU ensure a more 'balanced' approach in the drive towards a circular economy?

Notwithstanding the positive elements of the Commission's Communication, the Nickel Institute supports a 'realistic' approach to a circular economy, one that adopts a scientifically sound basis and takes account of full life cycle thinking and assessment, given that secondary raw materials cannot alone meet the constantly increasing demands of a sustainable economy. It is essential, for our future, to ensure that the best outcomes for the environment be identified and put in place while, at the same time, maintaining business competitiveness in line with a European Industrial Renaissance.

Q4. How should the EU deal with materials in the context of the debate on the circular economy?

The Nickel Institute supports the proper management of waste streams. The emphasis on hazardous materials or end-of-waste specific criteria is, however, redundant in the light of other EU legislation on REACH, RoHS and WEEE, which already provide an adequate framework for safe use, production and end of life management of chemicals. What's more, the Commission's Communication on the circular economy advocates reducing the use of hazardous substances by substitution. Such an approach, however, overlooks the fact that some of those substances contain properties which are critical to the development of resource efficient products and innovative technologies. The restriction of such substances would highly impact the whole value chain in Europe, including downstream and end users which depend heavily on these substances. This in turn would hamper innovation and the competitiveness of EU business.

Q5. How does the Communication link with the Europe 2020 Strategy?

Resource Efficiency is one of the flagship initiatives established under the Europe 2020 Strategy with the objective to decouple growth from resource use envisaging "Europe - a society without waste". The Review of Europe 2020 Strategy is currently underway and the European Commission suggests that a resource efficiency headline target should be included to highlight the importance and relevance of resource efficiency for sustainability, growth and jobs. The Nickel Institute fully supports innovation and new business models focusing on recycling and turning waste into a valuable resource. It goes without saying that closing the loop of resources is an ambitious and admirable vision. Nevertheless, the Nickel Institute advocates that any future action or measure should be based on realistic and science based knowledge enabling industry and SMEs to flourish and contribute effectively to a Circular Economy Europe.

Q6. What could be the impact of a 'resource productivity headline target'?

The setting of a 'resource productivity headline target' in the context of the Europe 2020 strategy, while optional, is still a concern. Such an indicator would not reflect the resource efficiency of a product through its lifecycle, but only its material use. For example, nickel is used mainly as an alloying element in stainless steel, thus permitting a long lifespan and low maintenance requirements and high recycling efficiencies. The stainless steel façade of the New York Chrysler building for instance, built in the late 1920s, has been cleaned only twice in the past 90 years and no major maintenance is required due to the high quality of the stainless steel.

Another example is that of the The Progreso Pier on the Yucatan Penninsula in Mexico, 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.

About the Nickel Institute

The Nickel Institute is the global association of the world's primary nickel producers who together account for the majority of annual nickel production. Our mission is to promote and support the use of nickel in appropriate applications. NI grows and defends 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