

Roadmap to a Resource Efficient Europe Position Paper of the Nickel Institute

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The Nickel Institute calls for a balanced and realistic resource efficiency roadmap, that takes into account the needs of all interests, is based on latest research, applies true life cycle thinking, is aligned with ongoing work in related areas and sets goals that are both realistic and achievable

Introduction

The Nickel Institute takes note of the Commission communication on resource efficiency and of the opportunity to contribute to the consultation on “A Resource Efficient Europe”. In this context, the Nickel Institute would like to offer some general and specific points which it considers of particular importance for a balanced and workable Roadmap to a Resource Efficient Europe.

Executive summary

The Nickel Institute feels strongly that the Roadmap should focus on key areas where resource efficiency plays a central role rather than covering a wide range of areas. Moreover, the full life cycle impacts should be considered as well as the consideration of the benefits to society of using resources. Resource efficiency is already a reality. The majority of industry sectors are already dealing with it day to day, largely through the need to address high energy and raw material costs – it is sound business and important for competitiveness. Legislation and EU product policy are also playing a part in terms of material selection and optimization of processes. Given these facts, the introduction of targets such as ‘full recycling economy’ and ‘zero waste’ need to be carefully considered and must have justified value added for both the environment and the economy. Indeed the communication contains many expectation-raising elements which in practice will be hard to implement and meaningless in terms of EU resource efficiency (e.g. listing of all substances of very high concern on the REACH candidate list). The Nickel Institute believes the Roadmap should be better aligned to overall EU economic goals focusing on contributing to sustainability and competitiveness of the EU within a global context – the EU is not an island.

Comments

(1) Products and consumption patterns

The Nickel Institute strongly supports the idea that the **full life cycle of the products** should be considered. The Institute's principal concern is that environmental impacts are prioritised as opposed to the real life cycle thinking and that the **real benefits from using raw materials, such as longer life time and more durability are ignored**. For example, Green Public Procurement criteria based on environmental footprint or hazardous classifications might have an adverse impact on the overall objective. Potential hazard-driven decisions on resource efficiency can overlook the benefits of the materials and their special properties that justify their use (e.g. making them fully recyclable). Once again the Nickel Institute strongly believes that it is important to avoid solely focusing on the hazard profile of a substance, and moreover believes that true life cycle thinking will be of key importance for a successful resource efficiency roadmap.

(2) Waste and Recycling

Resource efficiency is already a reality in most sectors of industry. For valuable materials such as metals, massive achievements have already been made and this improvement has to be pursued in other sectors. There is some potential in improving reuse and recycling but we should not overestimate it. **Calls for a zero waste economy are not realistic, achievable or beneficial for both environment and economics**. It is important to acknowledge that increasing recycling to a maximum might have adverse environmental impacts e.g. increased energy consumption.

(3) Key sectors

In line with the waste hierarchy, as one of the key principles in EU waste legislation, the Nickel Institute supports the reuse of products which are promoted in the resource efficiency roadmap. Nevertheless it has to be acknowledged that **the main environmental impacts occur during the use phase, e.g. in housing or transport, and that the environmental impacts from raw materials production and manufacturing are comparably low**. This has been demonstrated in various life cycle assessments and studies which were carried out by the European Commission itself in the context of its Integrated Product Policy (IPP). More efficient products and articles may require more raw materials. But they will help to decrease the overall environmental impact. Nickel containing batteries for full electrical and hybrid vehicles is a good example; nickel containing stainless steel in wind mills or solar panels is another.

(4) Substances of very high concern

The Nickel Institute is surprised by the introduction of a target to have all substances of very high concern (SVHC) put on the REACH Candidate list by 2020. This is both irrelevant to resource efficiency, creating an administrative burden on Member States and ECHA (when resources at national and EU level are scarce) and will be unachievable on the basis of current progress. Moreover, there is a real danger of losing track with respect to the real substances of **very high** concern. Most of the metallic substances which are considered as SVHC do not reach the consumer directly but are used in industrial processes under controlled conditions.

(5) Indicators and targets

The Nickel Institute takes note of the debate on setting robust indicators. However it considers that the discussion around indicators needs to be more balanced and duplicates the discussions which already took place around the Thematic Strategy on Natural Resources.

Conclusions

The Nickel Institute sees the Roadmap as a point of departure for a renewed discussion on resource use within the EU economy. It should be pragmatic in its approach, building on existing experience with respect to product policy. It should embrace the life cycle approach more fully than heretofore. There should be an acknowledgement that there are no easy choices. There should be an acknowledgement that the EU cannot unilaterally embark on an effective resource efficiency path without also developing a global consensus on the need for rational use of resources.

The Nickel Institute is a nonprofit organization that represents the interests of 27 companies which together produce more than 75% of the world's annual nickel output. We promote on behalf of our members the production, use and re-use (through recycling) of nickel in a socially and environmental responsible manner.

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