

**Mr Frans Timmermans**  
Executive Vice-President for  
the European Green Deal

**Mr Virginijus Sinkevicius**  
Commissioner for  
Environment, Oceans and  
Fisheries

Brussels, 06.07.2021

## **Re.: Revision of the Regulation 1013/2006 on Waste Shipments**

Dear Executive Vice-President, dear Commissioner,

The ambitions of the ***EU Green Deal*** and the release of the ***New Circular Economy Action Plan*** have imparted fresh momentum to the transition of the EU towards climate-neutrality and circularity. Furthermore, the importance of keeping a functioning recycling value chain in the EU, from waste to new-end products, has also been stressed. There is a need to ensure the recovery of valuable materials from waste and their availability to the industry in order for the EU to be less dependent on imports of virgin materials.

These aspects were emphasised in the recently published communication on the ***'EU Industrial Strategy'*** and in the ***'Critical Raw Materials Resilience: Charting a Path Towards Greater Security and Sustainability'***.

European steel is at the heart of European industry and is responsible for **330,000 direct, and 2.6 million indirect jobs, in the EU**. This is highly skilled, quality employment, and we need to keep these jobs in Europe especially during the closely linked green and digital transitions. The European Social Partners, the European Steel Association ([EUROFER](#)) and [industriAll Europe](#), fully support their members in working towards a carbon-lean, environmentally responsible, circular and internationally competitive European steel sector.

However, although the European steel sector is keen to improve its circularity by increasing its use of scrap metal, the period between 2015 and 2019 saw a sharp rise in ferrous scrap exports from the EU-27, rising from 9 million tonnes to **15 million tonnes in 2019**. This fact is highly concerning as ferrous scrap has a **emissions reduction potential of between 1.4 and 5 tonnes CO2** during the steel making process.

Access to European scrap ferrous metal is essential for the decarbonisation of the sector, which includes the journey to becoming fully circular. Unfortunately, the EU remains a massive exporter of waste (**26 million tonnes in 2019<sup>1</sup>**), preventing European industries from becoming more circular.

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<sup>1</sup> [https://ec.europa.eu/eurostat/databrowser/view/cei\\_srm020/default/table?lang=en](https://ec.europa.eu/eurostat/databrowser/view/cei_srm020/default/table?lang=en); Circular Economy monitoring framework; indicator 'Trade in recyclable raw materials EU-27' based on the waste streams containing: plastic; paper and cardboard; precious metal; iron and steel; copper, aluminium and nickel.

Moreover, these exports of waste result in much higher greenhouse gases emissions. They could lead to social and health problems because waste processing in third countries often takes place under conditions that do not meet the same standards on the environment, labour and safety as those in Europe. **For the sake of the environment, worker's rights and public health, this trend of rising waste exports needs to stop.**

The **European Parliament's Resolution 2020/2077(INI) on the New Circular Economy Action Plan** highlights this critical point: It recognises the need to *'halt the export of waste to third countries that cause environmental or human health damage and to tackle the unlawful behaviour more effectively with the aim of ensuring that all waste is treated in accordance with circular economy principles'*.

The European social partners support this demand and insist that the exports of secondary raw materials be better regulated. More specifically, exportation should only be allowed when the country of destination demonstrates its commitment towards climate, environment, worker rights and ILO fundamental rights.

In other words, it has to show to have implemented equivalent standards on the environment (emissions control and waste management), climate (ambitious climate targets and specific instruments for cutting GHGs) and human health (including workforce rights and safety).

We, the European social partners, have supported the European Commission and the European Parliament in their work in this area, and we urge EU policy makers to continue their crucial efforts by ensuring that the revision facilitates the effective transition towards a climate-neutral and truly circular EU economy.

**Therefore, the European steel social partners, EUROFER and industriAll Europe, call on EU policy makers to use the revision of the Regulation to ensure that it effectively regulates the exportation of EU ferrous scrap, a precious circular raw material which is essential to increasing the circularity and the decarbonisation of the European steel sector, and re-establishes a level playing field between Europe and third countries, both in its environmental and social aspects.**

We want to express our appreciation for your consideration of our letter and we remain at your disposal to discuss the review of the Waste Shipments Regulation (1013/2006) with you at your convenience.

Yours sincerely,

  
industriAll European Trade Union  
The European Steel Association (EUROFER)