

From: [REDACTED]
To: [CAB BRETON ARCHIVES](#)
Subject: FW: Follow-up_EuRIC meeting/CRMs-TyreRecycling-ELVs
Date: lundi 19 juin 2023 14:16:34
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[4. EuRIC's position on new ESPR product priorities.pdf](#)
[EuRIC Position Paper EPR schemes for ELV.pdf](#)
[EuRIC-Call for Recycled ContentPlastics.pdf](#)
[EuRIC's position on proposal for a Regulation on CRMs.pdf](#)

From: [REDACTED]
Sent: Monday, June 19, 2023 1:07 PM
To: CANTON Joan (CAB-BRETON) [REDACTED]
Cc: [REDACTED]
Subject: Follow-up_EuRIC meeting/CRMs-TyreRecycling-ELVs

Dear Mr Canton,

We would like to thank you very much for your time last Thursday.

Please find enclosed a few documents regarding the three topics we touched upon:

- **Critical raw materials recycling:** EuRIC supports the European Commission flagship CRM Act. Yet, a financial pillar is missing. To boost CRMs recycling, it is of utmost important to prioritise streams where CRMs are to be found in non-negligible quantities, boost their design for recovery and set incentives in the form of recycled content targets (as done for permanent magnets but with a deadline which should not be postponed especially by the Council).
- **ELV recycling:** the recycling industry has the technology and is ready to scale up facilities to recycle ELV plastics to meet forthcoming targets that pull the demand in that respect. These targets are de facto essential both to pull the demand in recycled plastics in cars and ecodesign. Regarding metals, recycled content for steel are desirable in order especially to meet the demand for flat steel products and boost innovation in flat steel products. Regarding additional dismantling obligations, there are strong doubts, except when they can make for sense for re-use. Otherwise, constant innovation into post shredding technologies enable to recover at scale metallic and organic fractions, that have not been recovered during the mechanical part of the treatment. Last but not least, it is essential to bear in mind that cars have a positive value for recyclers. This explains why 88% of the costs to meet the obligations of the current ELV Directive were born by the European recycling industry alone. Thus, the need for EPR is far less pertinent than for packaging for instance.
- **Tyre recycling:** EuRIC consistently advocated, through its tyre recycling branch (MTR), for standardised risk management measures over a flat ban of infill from tyre recycling (ELTs) in artificial turf pitches. The legislator has so far decided otherwise. The problem is that 1/3 of the tyre recycling market will disappear as a result and that the market is already reacting. As requested, it is absolutely essential, if we don't want to witness a surge of ELTs exports for incineration purposes in countries abiding with much lower (or no) standards, to ensure that alternative markets are developed. EuRIC advocates in particular for setting realistic recycled content targets for recycled rubber in tyres and into cars either as part of the ESPR (see position

attached covering tyres) in which tyre shall be prioritised or as part of the forthcoming revision of the ELV directive and for green public procurement rules that reward the use of recycled tyres materials (rubber in asphalt, steel or textiles' fibres also found in tyres).

You will find enclosed:

- EuRIC latest position on ESPR focusing on tyres, textiles & intermediary metal products;
- EuRIC position on ELVs and ELVs plastics;
- EuRIC latest position on CRMs.

We stand ready to follow-up should you have any questions.

With best regards,



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