STATEMENT

Europe's metals value chain cannot be competitive at recyclers' expense

Brussels, 17 November 2026 - Recycling Europe strongly challenges EUROFER and European Aluminium's support for the European Commission's draft list of non-OECD countries authorised to receive EU waste shipments, which excludes major international markets for European steel and aluminium "scrap".

Under the guise of environmental protection, both associations are endorsing restrictions that would reduce competition, depress prices and secure cheaper feedstock for manufacturers at recyclers' expense. The Commission must ensure that the Waste Shipment Regulation serves its environmental objectives, with exports of secondary raw materials classified as waste exported only to EU-authorised third country facilities and subject to auditing requirements, rather than becoming a tool for market protection that undermines Europe's entire metals value chain.

Recycling Europe highlights 7 fundamental contradictions:

- **Environmental protection must not become market protection.** EUROFER and European Aluminium portray metal recycling abroad as shifting Europe's pollution burden, ignoring the fact that, most of the time, recycling has already taken place in Europe, and that recycling steel and aluminium saves energy, reduces emissions and conserves raw materials compared with primary production. **Their narrative misleadingly casts recycling as an environmental burden rather than recognising its essential contribution to decarbonisation and resource efficiency.**

- **Restricting exports will not create European demand.** European recycling businesses produce an oversupply of recycled metals, and as figures prove, the vast majority of steel and aluminium recycled by our members stays within the EU, and only around 20% exported[1], since there is no domestic demand for it. Yet the industries calling for these markets to be restricted offer no corresponding commitment to purchase the materials that would otherwise be exported. **If manufacturers want more scrap to stay in Europe, they must commit to buying and using it**, rather than restricting recyclers' access to other customers. This means supporting mandatory recycled-content targets in EU legislation to create predictable demand for recycled materials.

- **Cheaper feedstock for manufacturers is not industrial competitiveness.** EUROFER and European Aluminium represent industries that buy the very materials whose exports they seek to restrict. Reducing the number of potential buyers risks depressing secondary raw materials prices and weakening recyclers' business case. Transitioning towards a more circular economy in the EU requires rewarding the environmental benefits of recycling through market prices, rather than artificially driving down the value of recycled materials to the

[1] Forging a more circular and sustainable EU steel industry - Joint Research Centre

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benefit of linear value chains. Morover, high energy costs and global competition are genuine challenges for European metal producers, but they cannot be solved by transferring the financial burden to their suppliers.

- **End-of-waste is not a loophole, it can reward quality and boost circular value chains.** As the Commission works to address gaps in EU end-of-waste rules, EUROFER and European Aluminium are already seeking to cast doubt on the status of compliant recycled materials. **Materials that meet the applicable legal criteria must be recognised and traded as products.** Many of our businesses already produce recycled materials that meet these requirements. EUROFER and European Aluminium's position raises a fundamental question: are they seeking to protect environmental standards, or to reserve the status of product manufacturers for their own industries, keeping recyclers in the position of waste suppliers and securing cheaper feedstock?

- **Without viable recyclers, there is no secure supply of recycled metals.** Collection, sorting and processing involve real costs, including energy, transport, equipment and labour. If the prices of recycled metals no longer cover these costs, recyclers cannot sustain their operations. Restricting export markets may offer manufacturers cheaper feedstock in the short term, but it undermines the collection and processing capacity on which they depend. **Cheap "scrap" is of little use when nobody can afford to produce it.**

- **Environmental standards must apply equally to imports and exports:** EU metal producers cannot demand stricter scrutiny of EU-exported recycled metals while overlooking the environmental standards under which the scrap they import is collected and processed. A genuine level playing field requires consistency in both directions.

- **Circular value chains require commitment, not confrontation.** Manufacturers cannot call for securing recycled materials while opposing measures that would boost their use. Recycled-content targets, green public procurement and circular VAT are essential to create demand and give recyclers investment certainty.

Competitiveness must serve the entire value chain. Recycling Europe calls on the European Commission to **remain impartial, base its decisions on objective evidence and environmental compliance rather than the commercial interests of individual industries, and uphold the legal status of materials meeting EU end-of-waste criteria.** Instead of allowing environmental legislation to become a tool for market protection, the Commission must address the real barriers to greater domestic uptake, including high energy costs, insufficient demand and limited processing capacity.

Europe's industrial competitiveness cannot be built by restricting recyclers' access to markets while offering no guarantees that their output will be purchased. **European manufacturers need competitive access to recycled materials. European recyclers need competitive access to customers. Neither can thrive at the expense of the other. If Europe's metal producers want secure supplies tomorrow, they must stop undermining the businesses supplying them today.**