



Brussels, 23 June 2026
(OR. en)

11025/26

POLCOM 235
COMER 110
INTER-REP 51

NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	Presentation by Recycling Europe at the meeting of the Working Party on Trade Questions on 23 June 2026

Delegations will find attached a presentation by the Recycling Europe, with a view to the discussion by the Working Party on Trade Questions at its meeting on 23 June 2026.

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Recycling Europe's views on trade measures for recycled aluminium 'scrap'

23 June 2026

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Recycling Europe at a glance



84 members



24 EU and EFTA
Countries, and the UK



2+ million
Green and local jobs



5500+
companies



95 billion euros turnover



Streams covered



PLASTICS



PAPER



TEXTILES



CONSTRUCTION
& DEMOLITION
WASTE



Non-ferrous
METALS



Ferrous
METALS



TYRES



ELECTRICAL &
ELECTRONICAL
WASTE



SHIPS

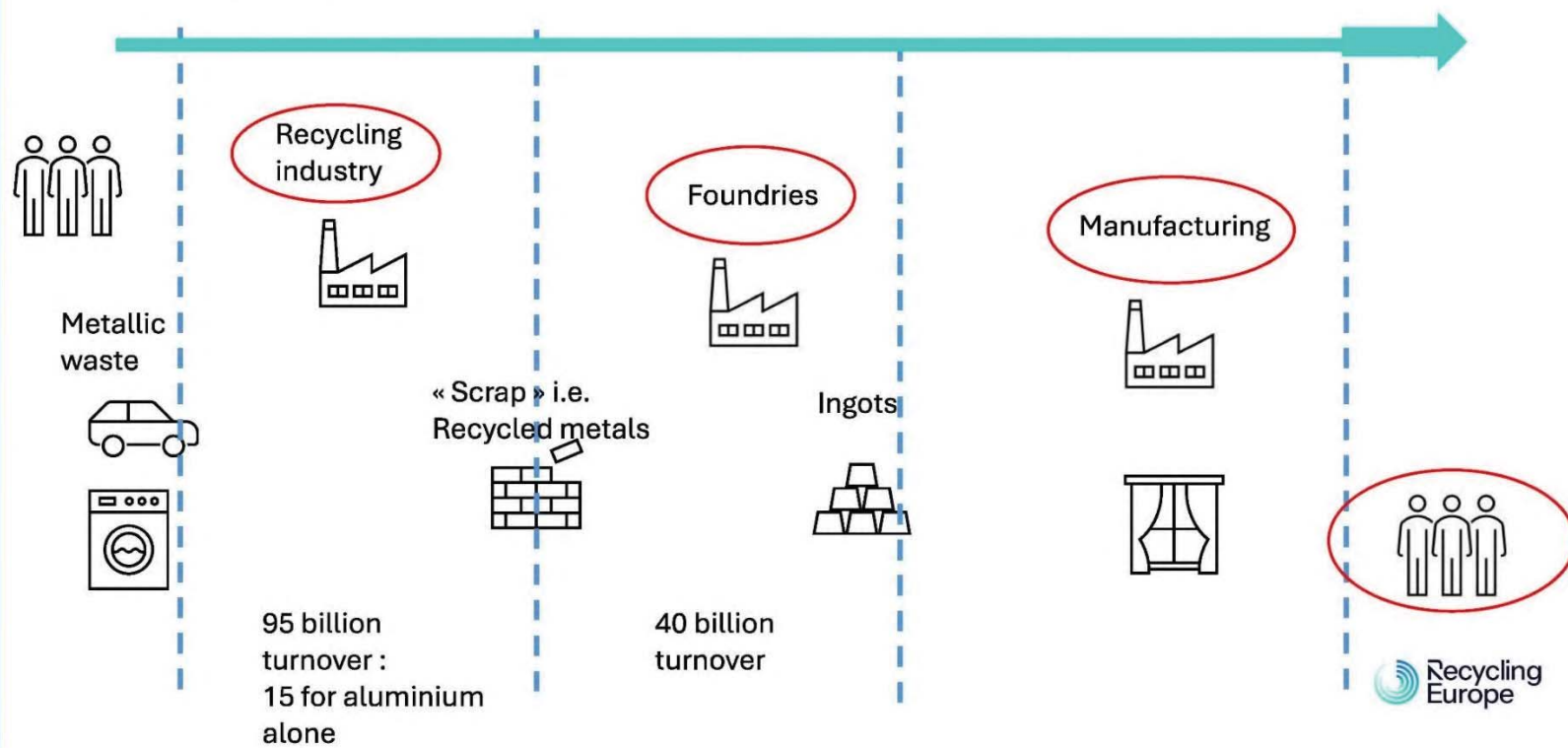


END-OF-LIFE
Vehicles

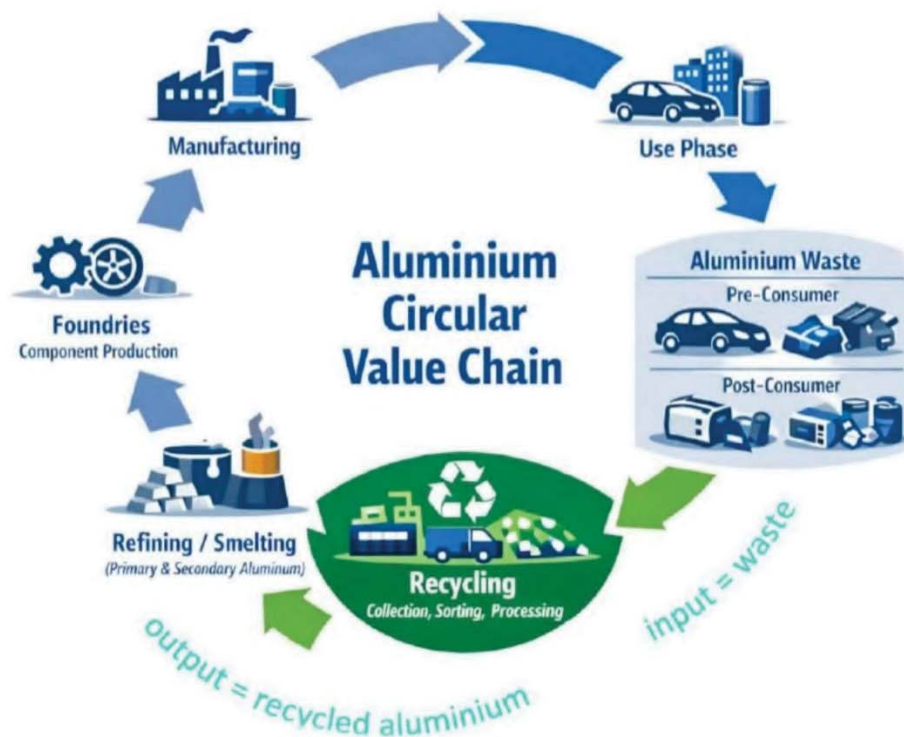


Understanding the European aluminium recycling value chain

Aluminium value chain



The Aluminium recycling value chain



Recycling steps:

Recyclers collect (**buy**) waste containing aluminium,

They process it in the recycling plants (through different technologies) and,

they sell the recycled aluminium to primary and secondary refineries.

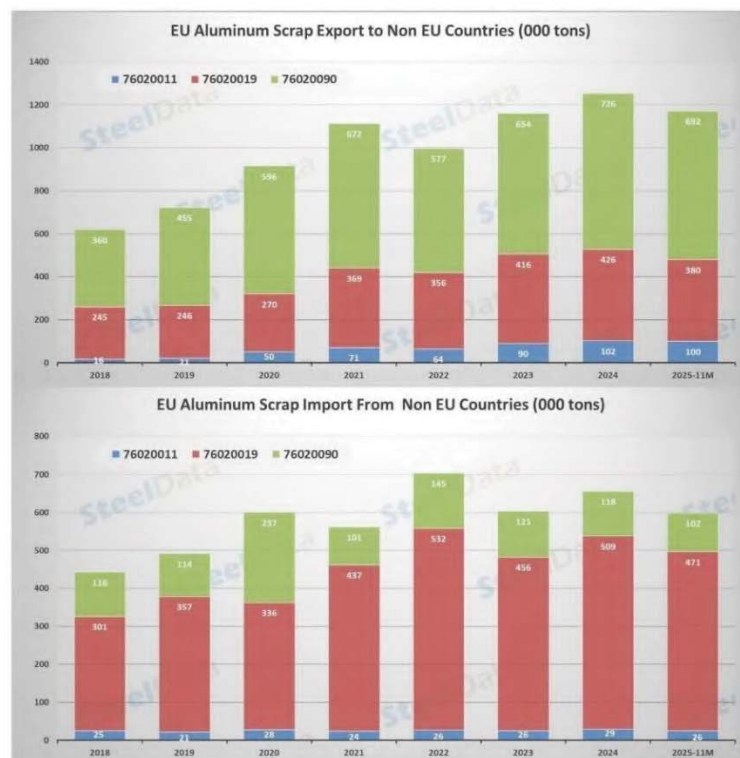


Key numbers



Recycling Europe

TAXUD survey results



EU aluminium scrap exports reflect a structural mismatch

TAXUD survey results show that the scrap exported from the EU is **not equivalent** to the material being imported.

EU smelters do not absorb the full range of scrap grades produced by European recyclers.

With around 5 million tonnes already retained in the EU, much of the remaining 1.2 million tonnes exported consists of grades that are not suited to EU smelters' technical or commercial requirements.



Breaking down the trade changes brought by the waste shipment regulation

Waste Shipment Regulation (EU) 2024/1157

Governing waste movements within, into, out of, and through the EU – ensuring environmental protection and legal control

What the WSR aims to achieve

Protect Environment & Health

Safeguard ecosystems and human well-being from hazardous waste impacts

Support Climate Neutrality

Drive EU's transition to net-zero emissions through responsible waste practices

Prevent Waste Dumping

Stop the EU from exporting environmental burdens to vulnerable regions

Strengthen Enforcement

Combat illegal shipments with enhanced monitoring and penalties

How?

The Regulation establishes procedures and control regimes for waste shipments based on:

- the origin, destination and route of the shipment
- the type of waste
- the type of treatment applied at destination

When?

- Entered into force: 20 May 2024
- Most provisions apply from: 21 May 2026
- Some export rules apply from: 21 May 2027
- Until then, Regulation (EC) No 1013/2006 continues to apply

The scope of application remains unchanged



Shipment rules

Intra-EU Shipments

Waste movements between EU Member States

- Information vs Notification (PIC) Procedure
- No audit requirement

Exports from the EU

Exports to OECD countries

- Audit obligation for receiving facilities (Article 46)
- Exception possible if an EU international agreement confirms environmentally sound management (Article 46(11))

Exports to non-OECD countries

- Only allowed if the country is on the EU authorised list
- Audit for receiving facilities always required (Article 46 + Annex X)



Exports to OECD countries

Applicable regime

From **21 May 2027**, new export/audit rules apply to exports of waste for recovery outside the EU. These rules differentiate between OECD and non-OECD countries.

Exports to OECD countries

- The procedural framework is **largely similar to intra-EU shipments**
- The European Commission will **monitor export trends** and if exports risk causing **environmental harm** in the destination country:
 - the Commission will enter into **dialogue** with that country
 - exports may be **suspended** if waste is not managed in an **environmentally sound manner**
- **Plastic waste exports** are subject to **particular scrutiny**

Audit requirements (Article 46 and Annex X): For exports of waste from the EU to OECD and non-OECD countries, the recovery facility must be subject to an independent audit demonstrating compliance with requirements broadly equivalent to EU environmental and human health standards.

Audit exemption ("waiver") for certain OECD countries (Article 46(11) and (12)WSR)

General rule (Article 46 WSR): Exports outside the EU require an **audit** of the receiving facility.

However, an **exemption** applies where:

- an **international agreement** exists between the EU and the third country, and
- that agreement confirms that waste is managed in an **environmentally sound manner**

In such cases, **no facility audit is required** under Article 46

Important:

- The exemption applies at **country level**, not to individual facilities
- The exemption does **not** apply to non-OECD countries



Exports to non-OECD countries

Applicable regime

Existing **export bans** remain in place as under the current rules:

- All waste for **disposal**
- Hazardous waste for **recovery**



New stricter rules for non-hazardous waste (from 21 May 2027)

- Exports of non-hazardous ("green-listed") waste to non-OECD countries will be generally prohibited
- Exceptions are possible only for non-OECD countries that:
 - **Are included** on the EU authorised country list, and
 - **demonstrate environmentally sound waste management**



List of non-OECD countries

Phase 1

Application process: Interested non-OECD countries had to:

- Submit an **application** to the Commission by **21 February 2025** (*Annex VIII form*)
- Specify the **non-hazardous waste** (and possible mixtures) for which export is requested
- Provide a list of **authorised treatment facilities**

Conditions for inclusion (Article 42): Applications must demonstrate **environmentally sound management** (*criteria in Annex IX*) - Evidence on:

- national treatment capacities by waste type
- separate collection capacity & national targets
- proportion of waste disposed of & reduction measures
- national legal framework for waste management
- enforcement, pollution control & compliance systems

Phase 2

Commission assessment of applicant countries ongoing

Public consultation in the Summer 2026 – Draft list

Delegated act establishing the list expected **before 21 November 2026**

Phase 3

21 May 2027 → List becomes applicable & Facility audits to be mandatory

List of applicant countries & waste types requested - received by July 2025: [here](#)

ASIA:

- Kazakhstan
- Oman, Saudi Arabia
- Bangladesh, India, Pakistan, Sri Lanka
- Thailand, Vietnam, Lao DPR, Malaysia, Singapore, Philippines, Indonesia
- Hong Kong, Taiwan

EUROPE:

- Monaco, Andorra
- Bosnia and Herzegovina, Serbia, Montenegro, North Macedonia,
- Georgia, Moldova, Ukraine

AFRICA:

- Egypt, Morocco, Tunisia, Nigeria, Togo, Mauritius

SOUTH AMERICA: El Salvador



Getting the facts right

Exports are a market signal, not a 'leakage'

Grade mismatch

Some EU smelters/refiners do not need the exact grade available – the grades with insufficient EU demand must be shipped abroad

Demand mismatch

Due to stalling in major aluminium-using sectors, such as construction and automotive, there is no strong demand for recycled aluminium

Price signal

EU smelters/refiners are not willing to pay the price for recycled materials – virgin materials remain way cheaper

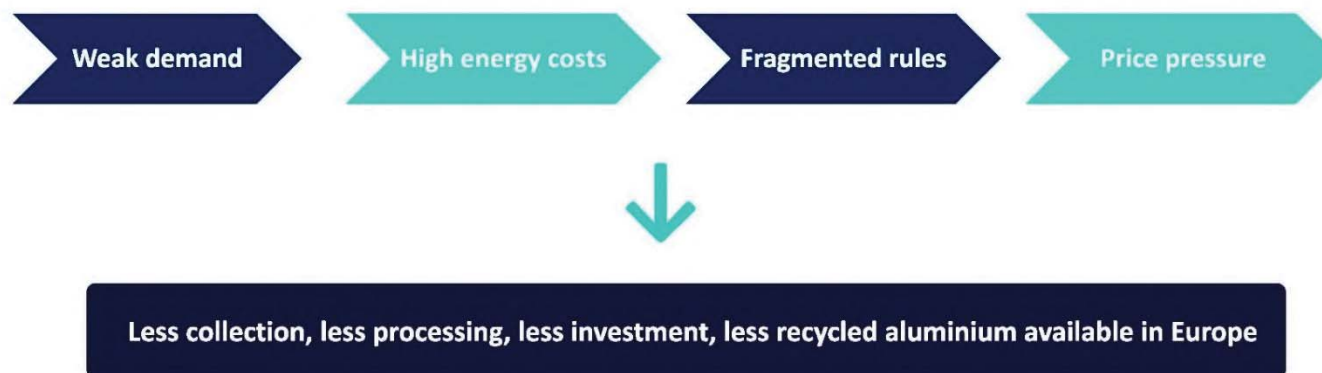
The answer is not to close the outlet.
The answer is to make Europe a stronger buyer.



The problem is not “scrap leakage” The problem is too little pull

Export restrictions focus on the outlet.

The real bottleneck is the lack of stable, competitive demand for (certain) recycled aluminium grades in Europe and a lack of commitment from manufacturers.



Why trade restrictions are a wrong idea



Exports of waste and recycled materials are already constrained by the **revised Waste Shipment Regulation**.



Lack of granular data on trade flows means **no clear picture** of the likely consequences.



No evidence of an export surge, so the case for restrictive measures is **not proportionate**.



EU demand does not cover **all grades** of recycled aluminium.

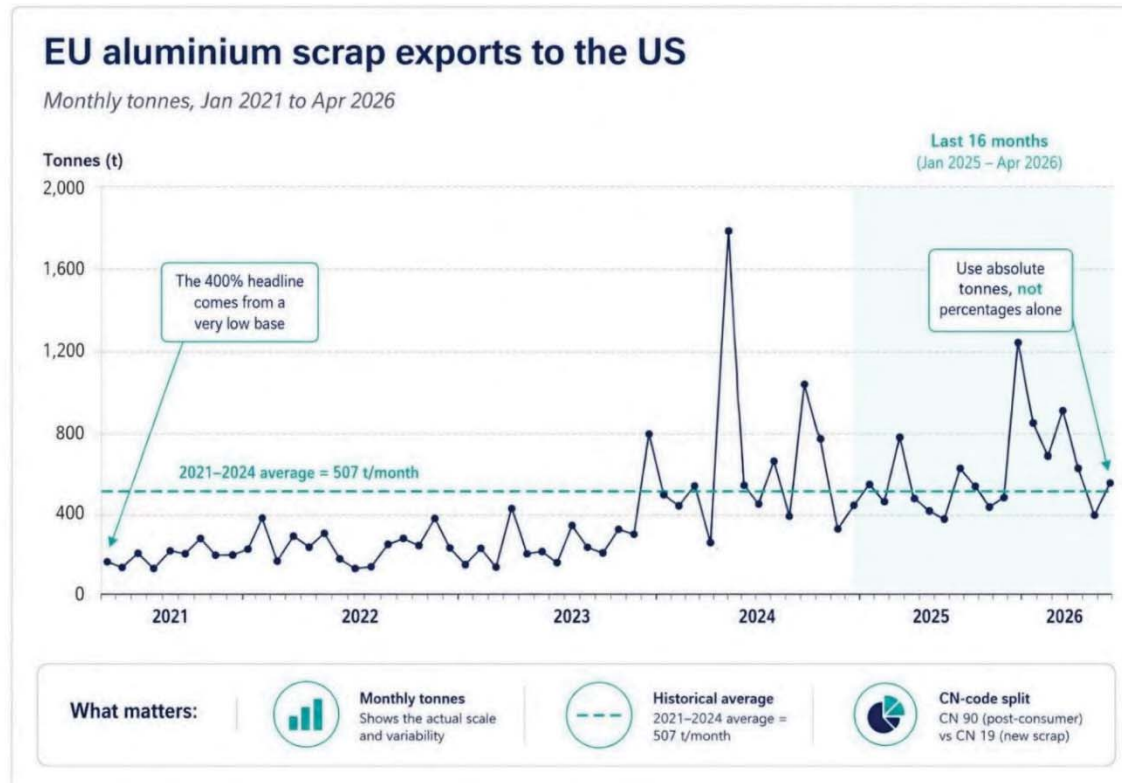


Restrictions would respond to the **wrong problem**, on the basis of **incomplete evidence** and **mismatched market demand**.



US exports: the 400% figure is a percentage trick

TAXUD data show the claim is driven by a small base — not a structural surge in aluminium scrap exports to the US.



MESSAGE FOR THE COUNCIL

Do not accept percentage framing without absolute tonnes.



Export restrictions – THE CONSEQUENCES



Export restrictions will bring exactly the opposite result!



The better agenda:
Make Europe the best customer for recycled
aluminium

New CN codes for aluminium waste and scrap

7602 00	Aluminium waste and scrap:
7602 00 11	--Turnings, shavings, chips, milling waste, sawdust and filings; waste of coloured, coated or bonded sheets and foil, of a thickness (excluding any backing) not exceeding 0,2 mm
7602 00 19	- Other (including factory rejects)
7602 00 90	- Scrap



7602 00	Aluminium waste and scrap:
7602 00 20	- Production waste and scrap
7602 00 30	- Used Beverage Cans (UBC)
7602 00 40	- Used wheels
	- Fragmentised (shredded):
7602 00 50	-- with at least 95 % of aluminium by weight and not exceeding 1,5 % of silicon in the aluminium fraction
7602 00 60	-- Other
	- Other:
7602 00 70	-- with a content by weight not exceeding 1,5% of silicon in the aluminium fraction
7602 00 80	-- Other

New CN codes for aluminium scrap will apply from January 2027 and allow for more granular monitoring.

Recycling Europe's REQUEST: Before introducing any trade measures, wait for the results of granular monitoring!



Solutions for the whole aluminium value chain



Reduce energy prices (cross-cutting issue)



Introduce legislative guarantees and incentives for the uptake of recycled aluminium by manufacturers



Guarantee the use of recycled aluminium via Green Public Procurement (GPP), and a green VAT for circular products



Secure long-term contracts between recyclers and EU aluminium smelters to guarantee stability



Protect the EU aluminium industry via CBAM



Untap the potential of Made in EU preference with incentives to use more recycled materials



Recycling Europe's requests to policymakers

- Do not introduce export restrictions before granular monitoring is available.
- Recognise that 80% of recycled aluminium already remains in Europe.
- Do not solve weak demand by fragilizing recycling's business model.
- Build a strong EU market for recycled materials through demand-side measures and commitments from manufacturers.

**The objective is shared: more recycled aluminium used in Europe.
The tool must not damage the industry that produces it.**



Have a question?



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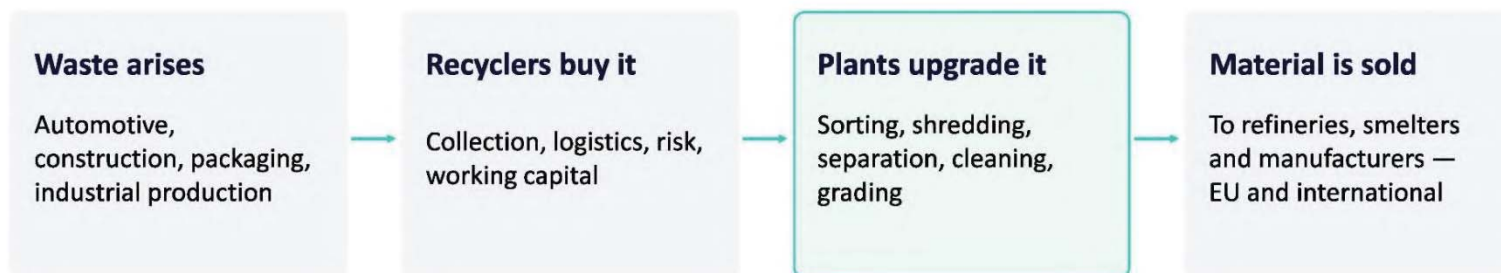
Address

Boulevard Auguste Reyers 70,
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Annex: Additional Information

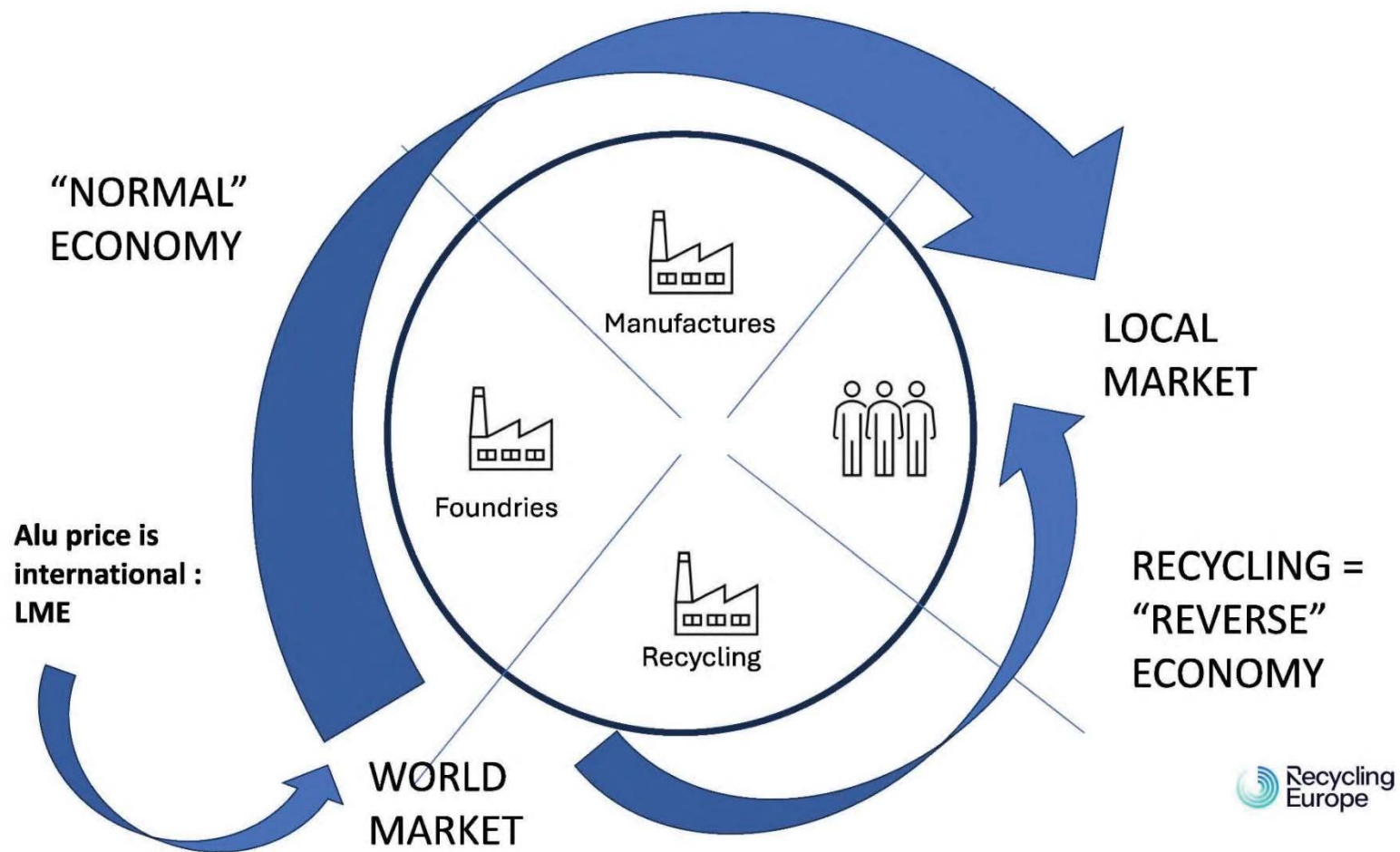
How the aluminium recycling market works

Recyclers do not receive 'free scrap'. We buy complex waste, invest in processing, and sell high-quality material into a European and global market



The price signal matters: if recyclers cannot sell at fair market value (in case of depressed prices), they will not keep buying and processing waste.



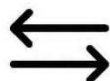


Aluminium recycling in Europe – THE FACTS



Environmental & climate benefits

- By using recycled aluminium, **CO2 emissions can be reduced by 92%** compared to primary aluminium.
- Recycling aluminium saves **95% of the energy** needed for primary production.
- One tonne of recycled aluminium saves up to **8 tonnes of bauxite, 14,000 kWh of energy, and 7.6 cubic meters of landfill.**



Trade figures

- **6.2 million tonnes of recycled aluminium** are **produced** and processed each year by EU recyclers.
- **1.2 million tonnes are exported**, meaning 80% of aluminium recycled in Europe stays within the continent.
- Balancing import and export figures give us a **net export rate of just 10%** of all recycled aluminium.



Recycling = reverse economy

1 HOW THE MARKET WORKS

1 Scrap prices are market-driven

Recyclers do not control the price of their output. Prices follow international market movements, notably the LME.



2 The only lever is input buying

The main commercial decision recyclers can make is the price they pay for metallic waste.



3 Competition for waste is intense

Across the EU, recyclers compete strongly for access to metallic waste.

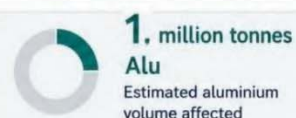


2 WHY TAXING SCRAP BACKFIRES



Because recyclers cannot raise scrap selling prices at will, taxation is transmitted back to collection and purchasing decisions.

3 THE SCALE OF RISK



if supply has to be artificially adjusted to EU market demand

Lessons from Argentina

Argentina lifted in 2025 its 'scrap' export restrictions

“This prohibition was harmful for several reasons. First, because by depressing the local price of scrap, it discouraged recycling.

But it was harmful, above all, because it prohibited an endless number of recycling businesses for very broad sectors of the economy—for example, copper cables discarded by telephone companies, which have an active market for recycling abroad.”

Federico Sturzenegger,

Minister in the government of Javier Milei.

He made the statement in January 2025 when announcing the end of Argentina's 16-year ban on exports of ferrous and non-ferrous scrap metals.

Applicable procedures

Different procedures apply depending on the type of waste, its envisaged treatment and the destination country.

Information procedure:

- For intra-EU and OECD shipments of “green-listed” non-hazardous wastes, **general information requirements** apply -basic information must be provided before shipment, incl.:
 - quantity
 - origin & destination
 - treatment method
- Possible extension/modification of the green list for intra-EU shipments expected through Implementing Act planned for Q4 2026

Procedure of prior written notification and consent (PIC):

- For shipments of waste subject to notification requirements, the shipment may only take place after the competent authorities concerned have assessed the notification and granted their consent.
- The procedure includes, inter alia:
 - submission of a notification dossier,
 - consent (or objection) by the competent authorities concerned,
 - financial guarantee,
 - movement document accompanying each shipment,
 - confirmation of receipt and recovery/disposal by the receiving facility



Exports to OECD countries

Exports to an EFTA country (Articles 37 & 38) and to an OECD country (Article 44)	Recovery	Disposal
Hazardous waste under: - the Basel Convention (Annexes VIII and II – Axxxx & Yxx) - the OECD Decision (Annex IV)	AUDIT (unless Article 46(11) applies) + Notification <i>(Laboratory analysis < 25 kg → Information procedure possible – Article 44(2)(e))</i>	Prohibited
“Non-listed” waste, hazardous and non-hazardous		
Waste mixtures		
Waste containing or contaminated with POPs		
Plastic waste (EU3011, Y48, A3210)		
Experimental treatment and laboratory analysis (> 25 kg)		
Non-hazardous waste - Bxxxx (except B3011) - Annexes III, III A (authorised mixtures) without further operations in non-OECD countries	AUDIT (unless Article 46(11) applies) + Information	
Municipal waste	Prohibited	

Any authorised export of **plastic waste** outside the EU will be subject to the [Prior Informed Consent \(PIC\) Procedure](#), a key provision of the Basel Convention.

Exports to non-OECD countries

Exports to a NON-OECD country (Articles 39 and 40)	Recovery	Disposal
Hazardous waste under: - the Basel Convention (Annexes VIII and II – Axxxx & Yxx) - the OECD Decision (Annex IV) “Non-listed” waste (EWC code with *)	Prohibited <i>Exception possible – see Articles 39(3) to 39(5)</i>	Prohibited
Municipal waste		
Waste containing or contaminated with POPs		
Non-hazardous waste: - Basel Annex IX (Bxxxx) - Annexes III, III A (authorised mixtures) and III B “Non-listed” waste (EWC code without *) ⚠ No export allowed for intermediate operations Article 40(2b)	EU List + AUDIT + Notification (Article 40(3)(c))	
Specific non-hazardous wastes AB130 (sandblasting residues), AC250 (surface-active agents), AC260 (manure), AC270 (sludge)	EU List + AUDIT + Notification	
Plastic waste (B3011, Y48, A3210)	Notification , but prohibited as from 21 November 2026 (possibility to reopen under certain conditions from 21 May 2029)	


 Plastic export ban

Applicant countries requesting aluminium scrap

ASIA:

- **Oman:** B1010 Metal waste, B1040 Scrap assemblies from electrical power generation, B1100 Metal bearing waste, B2090 Waste anode butts from steel or aluminium production, B2090 Waste anode butts from steel or aluminium production, B2110 Bauxite residue
- **Bangladesh:** B1010 aluminium scrap and B1100 metal bearing wastes arising from melting, smelting and refining of metals
- **India:** B1010 aluminium scrap, B1100 metal bearing wastes arising from melting, smelting and refining of metals (incl. Aluminium skimmings (or skims) excluding salt slag), B1050 Mixed non-ferrous metal, heavy fraction scrap, B2090 Waste anode butts from steel or aluminium production, B2100 Waste hydrates of aluminium and waste alumina and residues from alumina production, B2110 Bauxite residue, B3026 aluminium waste from the pre-treatment of composite packaging for liquids, B1250 Waste end-of-life motor vehicles
- **Pakistan:** B1250 Auto-parts scrap, B1010, B1100, B1050 Aluminum scrap, B1040 Aluminum cable scrap, B2090 Waste anode butts from steel or aluminium production, B2100 Waste hydrates of aluminium and waste alumina and residues from alumina production, B2110 Bauxite residue,
- **Vietnam:** 7602.00.00 Aluminium scrap,
- **Philippines:** B1010; B1050 Metal waste
- **Sri Lanka:** B1010 Metal waste, B1040 Scrap assemblies from electrical power generation, B1050 Mixed non-ferrous metal, heavy fraction, B1100 Metal bearing waste, B1250 Waste end-of-life motor vehicles, B2090 Waste anode butts from steel or aluminium production, B2100 Waste hydrates of aluminium and waste alumina and residues from alumina production, B2110 Bauxite residue, B3026 aluminium waste from the pre-treatment of composite packaging for liquids
- **Thailand:** B1010 Metal waste, B1040 Scrap assemblies from electrical power generation, B1050 Mixed non-ferrous metal, heavy fraction, B1250 Waste end-of-life motor vehicles
- **Indonesia:** B1010 Metal waste, 7602.00 Aluminium waste and scrap
- **Hong Kong :** B1010 Aluminium scrap, B1050 Mixed non-ferrous metal, heavy fraction scrap, GC010 Electrical assemblies consisting only of metals or alloys
- **Taiwan:** B1100 Metal bearing waste
- **Saudi Arabia:** B1010 Metal waste, B1050 Mixed non-ferrous metal, heavy fraction, B1100 Metal bearing waste
- ~~Lao DPR, Malaysia (only iron, steel and copper under B1010), Singapore, Kazakhstan,~~



Applicant countries requesting aluminium scrap

EUROPE:

- **Andorra:** Waste (including mixtures of materials) from mechanical processing of waste other than specified in code 19 12 11
- **Bosnia and Herzegovina:** 150104 Metal packaging, 16 01 18 Non-ferrous metals from end-of-life vehicles, 17 04 02 Aluminium, 19 12 03 Non-ferrous metals from mechanical treatment of waste
- **Serbia:** B1010 Aluminium waste
- **Montenegro:** B1010 Aluminium metal waste
- **North Macedonia:** 170402 Aluminium, 191002 and 191203 Non-ferrous waste, 150104 Metallic packaging
- **Georgia:** B1010 Aluminium scrap
- **Moldova:** B1010 Metal waste, B1250 Waste end-of-life motor vehicles, B1040 Scrap assemblies from electrical power generation
- **Ukraine:** B1010 Aluminium scrap
- ~~Morocco~~

AFRICA:

- **Egypt:** B1010 Aluminium scrap
- **Morocco:** B1010 Aluminium scrap, B1100 Aluminium dross, generally non-ferrous waste
- **Tunisia:** B1010 Metal waste, B1100 Metal bearing waste, B1110 Electrical and electronic assemblies, B1250 Waste end-of-life motor vehicles
- **Togo:** B1010 aluminium waste
- ~~Nigeria, Mauritius~~

SOUTH AMERICA: El Salvador



General timeline for exports

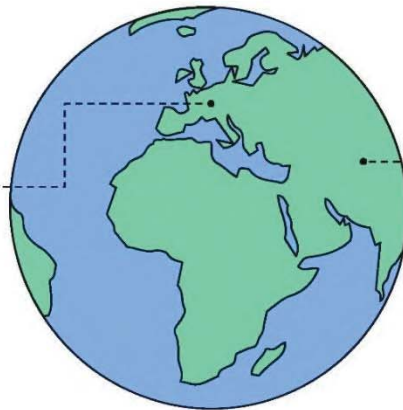


What competitiveness means for the EU recycling industry



EU Single Market

Remove trade barriers between MS with harmonised criteria (EU-wide end-of-waste criteria & facilitated shipments)



Access to international markets

Free and fair trade of recycled materials

Coherent policies between exports and demand



US exports: the 400% figure is a percentage trick

TAXUD data show the claim is driven by a small base — not a structural surge in aluminium scrap exports to the US.

1 Reality check

WHAT EA CLAIMS

+400%

sounds dramatic

TONNAGE REALITY

507 t/month

2021–2024 average
EU aluminium scrap
exports to the US

mean line

WHAT THE CHART MUST SHOW

A big percentage can hide a tiny base

Present **absolute tonnes**, the **monthly TAXUD series** and the **CN-code split** — not only a growth rate from a low base.

percentage — $\frac{\% \text{ change}}{\text{small base}}$ = **political scare number** — absolute tonnes

2 Rebutting the claims

CN-CODE MISMATCH

What is exported is not what smelters import

CN 90: post-consumer scrap CN 19: new scrap

POLITICAL RISK

The real danger is the framing, not the data

EU smelters' argument seems to make sense because it combines a large percentage with tariff anxiety. Any argument must show evidence in **tonnes, not rhetoric**.

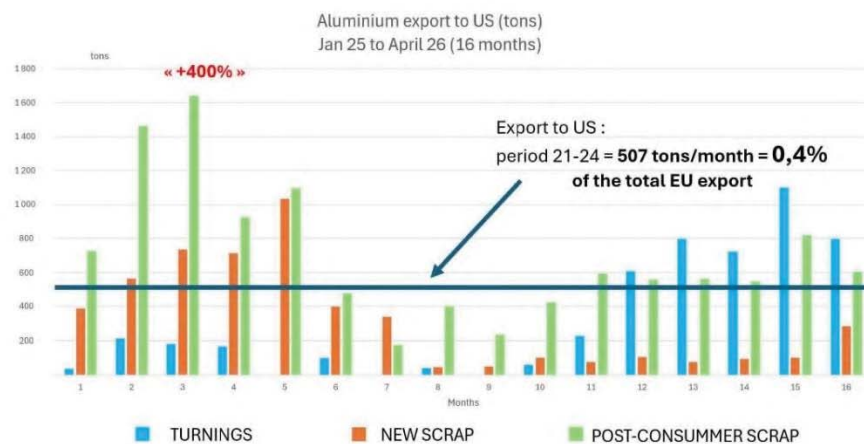
MESSAGE FOR THE COUNCIL

Do not accept percentage framing without absolute tonnes.

Source: TAXUD data analysis, 2021–Apr 2026; mean value provided: 507 t/month.



Debunking the alleged surge of exports to the US

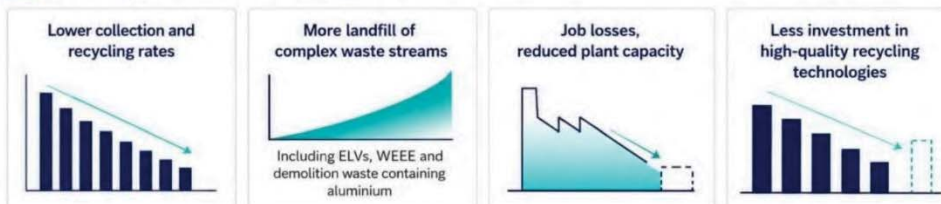


Export restrictions – THE CONSEQUENCES

1 Immediate market distortion



2 Consequences across the system



3 Why stockpiling is not a solution

- ✓ Facility permits limit stock volumes
- ✓ Constraints linked to fire prevention, EHS and site compliance

Investment signal already weakening

FEDERREC statistics indicate that, for the first time in years, investments by French recyclers **fell in 2025 compared with 2024.**

Investments by French recyclers
Index (2024 = 100)



! Uncertainty over market access is already affecting investment decisions.

The principles of free trade cannot apply selectively to one part of the value chain

When European producers export ingots or billets to markets with stronger demand...

“normal commercial behaviour”

When EU recyclers respond to the same market signals and export their surplus

“resource security threat – leakage of resources”

Double standards won't deliver a circular aluminium value chain.

Recyclers are asked to absorb the pain of market restrictions while other industrial actors retain normal commercial freedom.

