

The Bureau of International Recycling comments on the MMSD Draft

For the consideration of the Project's Assurance Group.

Draft Report obtained from website: <http://www.iiied.org/mmsd/draftreport/index.html>

The MMSD has carried out a considerable work and the authors must be congratulated for their perseverance. Here below, the Bureau of International Recycling makes no comment on the mining aspects, but restricts its comments to its own area of competence, namely Recovery & Recycling. There are only a few areas where BIR seeks changes in the MMSD draft text, though this does not mean that we would agree that the report describes Recovery and Recycling matters in a balanced manner, as particular recycling aspects have been taken out of context for certain arisings and for certain metals, however as the report is principally mining orientated this is understandable.

The BIR supposes that the document will be revised in the light of the proposed amendments, and that the finished document will be widely distributed to Governments and stakeholders. The BIR therefore would wish the Assurance Group to act on the proposals below to prevent the perpetuation of misunderstandings about the nature of the recycling industry sector.

Chapter 2: 2-10, Recycling, Re-use, and Re-manufacture, 3rd Para.

"If a metal is converted into a new chemical form, as in the production of chemicals, recycling is impossible. It is also impossible to recover metals that are widely dispersed in use."

Proposal: - replace "is impossible" with "may be difficult"; replace "impossible" with "difficult".

Justification: - 'impossible' is an absolute and in this context inaccurate, 'economically unviable' is an alternative phrase to consider.

Chapter 3: 3-8, Recyclers, 1st Para.

"Methods of scrap collection vary from 'mom and pop' operations with scrap metal (mostly aluminium and copper) piled in their backyard to large, sophisticated central collection and recovery centres such as those for lead-acid batteries."

Proposal: - replace "'mom and pop' operations with scrap metal (mostly aluminium and copper) piled in their backyard" with "Micro-enterprises of less than ten persons".

Justification: - Some recyclers do talk about 'mom and pop' companies, a comfortable phrase in their culture that is attractive to their public and their own politicians, for other cultures the expression is obscure and may even appear derogatory particularly with the back-yard reference, so for the MMSD document we propose an alternative terminology for an international audience.

Chapter 3: 3-8, Recyclers, 2nd Para.

"The recycling sector, in many cases completely disconnected from the primary producers, is often poorly organized, fragmented, and inefficient."

Proposal: - delete sentence.

Justification: - An outrageously biased and ignorant statement.

Chapter 5: 5-11, The Recycling of Aluminium, Para. Starting "The analysis.."

.. "For companies that generate new aluminium scrap, there should be an economic incentive to obtain cash for what would otherwise be a waste product, especially since the collection costs will be small. For old scrap, the economics of collection is less compelling. There may be a chain of four or five parties, each incurring collection, storage, transport, and finance costs, until the scrap is sold to a secondary smelter. The value of the scrap therefore diminishes towards the beginning of the chain."

Proposal: - replace text with ".. For companies that generate new aluminium scrap it is in their economic interest to obtain cash for the scrap they produce, especially since the segregation costs will be small. For old scrap, the economics of the collection and transport need to be taken into account, which it is in the industrialised countries where a complete recycling infrastructure exists particularly for the recovery and recycling of metals, whilst in industrialising countries such an infrastructure is growing.

Justification: - Firstly, the mixing up of waste issues with scrap generation issues, secondly misunderstanding that generators of new scrap are not collectors. Thirdly, smelters of course would love to have their infeed at no cost, and happily criticise the economics of the recovery sector! But really to cut the justification short - it is unreasonable to place arguments against the structure of the recovery & recycling sector which has grown up under a system of free enterprise over hundreds of years - and can be expected to have optimised its economic structures.

Chapter 5: 5-11, The Recycling of Aluminium, last Para.

"A persistent obstacle to the efficient recycling of aluminium is the way metal is used in many different alloys. Ideally, scrap should be sorted into specific alloys to be recycled. It is not difficult to keep scrap of the various alloys separate when it is new scrap that arises in an industrial process. With old scrap, particularly that collected from the shredding of cars or household goods, separating the scrap by alloy is harder. While it is possible to separate the different metals contained in a car (steel, zinc, copper, and aluminium, for example), there is currently no commercial process for separating the scrap by alloy. This means that even though some scrap contains several different alloys, it can be recycled only as lowest grade of foundry alloy, the lowest value category. A recent development by Alcan Aluminium promises to make it possible to segregate shredded scrap by alloy."

Comment: To say, "*Ideally, scrap should be sorted into specific alloys to be recycled*" is a remelter, or primary producer argument. A smelter may commonly find a certain mix of alloyed and low alloy scrap suitable for the production of a particular ASTM, EN, and ISO... Standard Casting Alloys, so why go to the expense to segregate one alloy from another? You are using a sector specific argument. The extent to which metals of the same family but of different alloy compositions should be sorted should be left to the market to decide, it should be economically driven not proposed as a overarching goal.

Using such arguments can reinforce the erroneous impression some observers already have that 'alloys' are bad whilst pure metal is good.

"there is currently no commercial process for separating the scrap by alloy" - "A recent development by Alcan Aluminium promises to make it possible to segregate shredded scrap by alloy" - we understand several of our members on different continents are using advanced automated separation systems, and by the way none of them are Alcan systems as far as we are aware. Again we should let the market decide.

Lastly: - *"it can be recycled only as lowest grade of foundry alloy, the lowest value category."* Suggest deleting this, as it seems to reflect a biased commercial viewpoint of a part of one sector! Foundry alloys have a wide range of important applications.

Chapter 5: 5-14, Copper, Para. Starting " In general, copper..."

"A greater threat of loss arises from copper used in small quantities in wire, for example, coated in insulating material. This may be too small in volume to justify recycling."

Proposal: - Delete sentence.

Justification: - We have many wire chopper and wire granulation plant wanting even more feedstock.

Chapter 5: 5-16, Lead, Para. Starting " Many battery producers..."

"Many battery producers organize their own collection systems for spent batteries through garages and other retail outlets. They then have the batteries smelted back into lead by a secondary smelter. Thus the recycling process does not rely totally on the scrap collecting industry, though some are collected by scrap merchants. Consequently, a high proportion of spent batteries are collected and reprocessed."

Proposal: - Delete the whole paragraph.

Justification: - Of course a smelter would like a direct return of scrap from a 'free-take back' scheme, or returns from the manufacturer. However, many of our "scrap merchants" are involved in the collection of used lead-acid batteries, and are integral to the success of certain national collection schemes. Indeed before collection schemes were in vogue our members were pretty much the only ones to collect ULABs. The last sentence of the paragraph appears to link the alluded to low collection to the past efforts of scrap merchants, surely that is not intended?

Chapter 11: 11-26, Recycling. First para.

"The different mineral commodity-specific industry associations, recycling trade organizations (such as the World Federation of Recycling Industries and the Bureau of International Recycling), and multilateral organizations (including OECD, the UN Conference on Trade and Development, UNEP, the World Customs Organization, and the European Committee for Standardisation) should collaborate in order to develop permanent systems for the systematic monitoring of trade flows in scrap and secondary materials. This information should be made publicly available."

Proposal: - Delete the paragraph

Justification: - This paragraph assumes there is no data 'out there', if this is the reason for the paragraph it is ill founded, as data is available if it is purchased, there is no need to "re-invent the wheel". To follow-up in more detail: 1) the World Federation of Recycling Industries is the Bureau of International Recycling 2) the systematic monitoring of trade flows in scrap and secondary materials is linked principally to the customs codes; 3) CEN will not add anything to such a process besides it is a European Organisation. Finally we disagree with this paragraph in principle as the gathering of statistics costs money (our members money and their time) the end-product should not then be freely or publicly available, try asking the World Bureau of Metal Statistics to give away their data for nothing!

We thank you for taking these comments into consideration and look forward to seeing a revised publication shortly.

With kind regards,

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