

RREUSE Reaction to the Critical Raw Materials Act

RREUSE welcomes the Commission's proposal for a Regulation on Critical Raw Materials that was first announced by President Von der Leyen in her 2022 State of the European Union address, but reaching the aims of the Regulation will not be possible without a concrete commitment to reduce material demand by prolonging the useful life of products through re-use and repair activities.

The success of the EU's twin transition ultimately rests on the availability of material resources, but it is crucial that the skyrocketing demand for key materials does not lead to increased reliance on mining activities, which have often been associated with human rights violation and severe environmental degradation¹.

Therefore, RREUSE is pleased that a whole section of the Regulation is dedicated to circularity aspects, especially welcoming provisions facilitating the dismantling of permanent magnets of large household appliances and promoting re-use activities in waste streams rich of critical raw materials.

However, the objective of "promoting re-use and preparation of re-use" seems to contradict to "increase the collection of waste products and components containing relevant critical raw materials and ensure their introduction into the appropriate recycling system" contained in the previous paragraph. This is because collection for recycling is very different from collection for re-use, which requires careful handling and appropriate storage in order to protect the reusability of the items in question, in line with relevant provisions of the WEEE Directive².

More clarification on this specific aspect is needed to ensure that the legislation on CRM act does not undermine the waste hierarchy by focusing solely on recycling and supply-side considerations. Ignoring demand-side factors would be a missed opportunity to ensure that the management of critical raw materials is carried out with maximum resource efficiency and a minimal impact on the environment, while also being conducive to job creation (60-140 jobs for 1000 tonnes of WEEE, depending on the category of WEEE collected³) and overall societal wellbeing.

Edoardo Bodo, Environment Policy Officer, RREUSE: "The most sustainable critical raw materials are those that have already been extracted and the circular economy is the most important tool to ensure that these resources are managed with maximum efficiency and minimum environmental impact. The proposed regulation correctly acknowledges the importance of re-use, but the focus on improving collection for recycling is a missed opportunity to fix a broken system that destroys discarded electronics instead of giving them a new life".

Press Contact

Myrto Delkou
Communication Officer – RREUSE
myrto.delkou@rreuse.org

¹ Yes to Life, no to Mining (2021) Driving Destructive Mining, p. 1. Retrieved from:

<https://yestolifenotmining.org/latest-news/eu-driving-destructive-mining/>

² RREUSE (2022) RREUSE's Answer to the Call for Evidence for the Evaluation of the WEEE Directive. Retrieved from:

<https://rreuse.org/rreuses-answer-to-the-call-for-evidence-on-the-evaluation-of-the-weee-directive/>

³ RREUSE (2021) Job Creation in the Reuse Sector: Insights from Social Enterprises. Retrieved from

<https://rreuse.org/job-creation-in-the-re-use-sector-data-insights-from-social-enterprises/>

