METALS INDUSTRY COMMENTS
on the new methodology for the Eco-design of energy-related products (MEErP)
presented to the Consultation Forum on 20 Jan 2012

Brussels, 10th of February 2012

The metal industry reiterates its severe concerns and reservations regarding the new MEErP released on 23 Dec 2011 as this methodology neither embraces the recyclability of products nor is aligned with the harmonized methodology for the calculation of the environmental footprint of products (PEF), recently developed by JRC based on the ILCD handbook.

Currently, MEErP considers recycling aspects only from a production perspective (input side), i.e. using the so-called "recycled content" approach. Thus, the recyclability of products is neglected, as end-of-life recycling (output side) is ignored by the methodology**.**

The statement made by the consultant arguing that recyclability is properly addressed into the MEErP methodology is incorrect and misleading as currently only the recycled content is considered. For example, carpets can be made of 100% recycled plastic bottles but their recyclability is usually very limited. Hence, the recycled content does not reflect in any way the recyclability of a product. As a result, the "design for recycling" efforts cannot be rewarded by the methodology.

The statement made by the consultant, based on slide 28 of the presentation "MEErP Consultation Forum 20 Jan 2012 VHK.pdf", that "*the stock-effect in a growth market places practical limits on the volume of waste material that is disposed and thus can be recycled."* is misleading. The stock-effect looks at recycling aspects from a material supply perspective and not from a product perspective. The stock effect demonstrates that even if 100% of a product was to be recycled at the end-of-life, the recycled material derived from this process would be insufficient for the today's market demand. Hence, the stock effect illustrates the need to secure end of life recycling of products, i.e. product recyclability, in order to limit the use of virgin material to satisfy the future market demand. Hence, contrary to Mr Kemna's statement, the stock effect demonstrates the need to improve the methodology to embrace product recyclability.

As already conveyed in the attached joint metal position concerning the MEEuP to the consultant on April 2011, the metal industry recommends complementing the MEErP with an additional module reflecting the environmental loads and benefits that result from the end-of-life phase, i.e. the product recyclability. This approach has been already implemented in the recent European standard "EN15804" defining the core rules for the environmental declaration of building products. This proposal reconciles both aspects of recycling, i.e. production phase and end-of-life phase, while avoiding any double counting and allowing MEErP alignment to PEF. Hence, this proposal leads to a more-advanced methodology able to reflect and tackle the environmental benefits that result from "design for recycling" efforts which are a key target in eco-design legislation. Moving to a more circular economy definitely requires the integration of recyclability into product environmental assessment.

The metal industry would be very pleased to contribute to improvement of this methodology and thereby its alignment with other EU methodologies for the calculation of the environmental impact of products throughout their life cycle.