

Common Position on the design of end-of-waste criteria for steel scrap

With an output of about 500 million tons of recycled iron and steel scrap per year, the steel industry is one of the most important recycling sectors. There exists an efficient and well-established market for these scrap metals.

In co-operation with the German steel recycling industry, the German steel industry supports the goal to release environmentally friendly recycled iron and steel scrap from waste regime through the configuration of end-of-waste criteria, in accordance with the revised EU-Waste-Framework-Directive (WFD). As a result of the improved framework conditions, the recycling markets should be strengthened.

With this objective and the further intention to market, store, handle and use iron and steel scrap (that meets specific requirements after appropriate treatment) as a product instead of waste - and to give legal security to this already applied praxis – both the German steel recycling industry and the steel industry, furthermore campaign for a short end-of-waste for steel scrap and practically manageable criteria for the determination of end-of-waste. Decisive for the end-of-waste of iron and steel scrap should be the date, in which there is a demonstrably suitable feedstock available for the steel industry.

The design of end-of-waste criteria for iron and steel scrap, however, has to guarantee that the current REACH problem will be clarified formally binding, explicitly in terms of simplification and administrative barriers cuts.

Our position for the configuration of product requirements for iron and steel scrap reads as follows:

1. Scrap metal meets established product standards, ie
 - it corresponds to the European Steel Scrap Specification, the ISRI specifications or more and more bilateral agreements
 - it is notably free of dripping oil adhesions
 - it is free of radioactivity, ie excludes material presenting radioactivity in excess of the ambient level of radioactivity

The criteria “iron content” and “metal content” are not suitable to describe the product quality of scrap and are therefore clearly rejected as criteria for classification.

The iron content of steel varies in a wide range and depends on the type of steel or its alloy. Generally, alloy will be identified as steel, if iron content amounts up to 50 % - sometimes even below it. Other metals like nickel, chrome or molybdenum can vary across type of steel fractions exceeding 25%. The determination of the metal content of iron and steel scrap, however, would not do justice to non-metal alloy components such as silicon or carbon, which may even come at a double-digit sum in steel. And even if “metal content” included these alloy components, it would not be possible to measure or document both, iron and metal contents, in praxis for each single delivery through representative samplings - neither before – nor after the melting process.

Instead – since complementary – the original target of these criteria, which is to get the purest possible steel scrap, can be achieved by limiting the percentage of visible foreign components (such as copper or minerals):

- Recorded in the European Steel Scrap Specification under “sterile”, these foreign components are - in accordance with established practice - visually measurable and verifiable. The underlying data of the Steel Scrap Specification is the basis for the classification of scrap grade.

2. Steel scrap comes from a suitable origin area.

In the design of the IPTS carried categorization of origin, the iron and steel scrap is not complete and may serve as a non-exhaustive list, only for orientation. It should be literally embedded in the text in the implementing measure that this is a non-terminated classification. For only the non-finite and non-limiting use of materials ensures the further development of technologies themselves.

3. The iron and steel scrap passes through, depending on source area – adequate treatment process, to meet quality requirements, according to 1. and in order to minimize any environmental risks.

A fixing of appropriate treatment steps is unnecessary, as the performance of under 1. mentioned product standards currently requires a specific treatment. A detailed fixing of treatment processes and techniques, moreover, would impede its further development in the market. The application of newly developed treatment procedure and recovery operations would be prevented or would be at least impeded and this would hinder the growth of recycling.

4. The company, intending to market scrap as a product, has an extern-certified quality assurance system and quality management system that is capable of ensuring compliance with the above-mentioned requirements. The steel industry and the steel recycling industry welcome the drawing of a specific quality assurance. The configuration of a quality assurance via certification or award of a seal of approval should, however, remain under national regulation and management.