

**ARA position concerning the
Consultation on the preparation of a Communication on Raw Materials**

PREFACE

Altstoff Recycling Austria AG (ARA AG) was founded in 1993 by the Austrian trade and industry. As service company ARA offers all companies that have obligations out of the Austrian Packaging Ordinance services out of its collection and recovery system. For enterprises that manufacture packaging, for importers of packaging or packaged goods, for fillers and packers ARA undertakes the requirement to accept returned packaging and recovery of used packaging. In addition to packaging the company undertakes the compliance, collection and recovery of electric and electronic equipment waste (WEEE) by its subsidiary company ERA. ERA was mentioned various times in the discussion of the recast of the directive WEEE as best practice example.

ARA closely cooperates with more than 200 regional disposal companies, 500 waste management associations and local communities all over Austria. Thus establishing a dense network for the efficient and cost-effective collection and recovery of packaging waste. By the collection and recovery of more than 820.000 t of packaging an equivalent of 600.000t CO₂ are saved per year.

Currently 15.135 companies are licensees of ARA. Additionally ARA is active in the field of waste avoidance and has established an endowed professorship for resource management with the Technical University of Vienna.

CONSULTATION

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

2. Do you see any additional raw material that should be considered as critical? If so, please explain.

The study focuses on non-energy minerals and metals. However, from a raw material point-of-view, also organic/petrochemical resources should be dealt with in their function as raw materials for plastics and polymers. Furthermore, we suggest adding phosphorus as key material for the agricultural sector to the list.

3. Do you have any comments regarding the recommendations of the report? If so, please specify.

The report calls for an improvement of the knowledge base of mineral deposits. In addition, the knowledge base has to be improved if not created with regard to secondary resources in anthropogenous material stocks and mass flows. With material stocks of approx. 400 tons per capita in industrialized Member States, these potential resources are an increasingly important source for the EU. We suggest to carry out strategic surveys on Member State level on resources in consumer and industrial goods, buildings and infrastructure in use as well as on raw materials in landfills (in use or closed), wastes and residues from waste treatment. Based on the analysis of quantity, quality and economic feasibility under market conditions, the appropriate technologies for exploitation can be developed, including a know how transfer from traditional mining to urban and landfill mining.

4. Are you aware of any initiatives in your country that aim to assess the criticality of raw materials? If so, please describe briefly.

In Austria, the Vienna University of Technology, Research Center of Waste and Resource Management, is currently doing research to assess resource consumption. The classical approach of static coverage is extended by considering aspects like recyclability, substitutability and the secondary stock of the raw materials. This is done by a systemic material flow approach and will result in a better understanding of resource scarcity and availability.

POLICY AREA: PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION

22. Are you aware of any research, development and innovation programme(s) at national, regional or local level? Please specify.

In Austria, the Vienna University of Technology, Research Center of Waste and Resource Management, is currently (2010) developing a 5-10 year research program aiming at the development of a database on secondary resources in Austria.

23. Where do you see the major gap / the urgent need for the raw materials sector related research, development and innovation at EU level. Please provide details.

The knowledge base has to be improved if not created with regard to secondary resources in anthropogenous material stocks and mass flows. With material stocks of approx. 400 tons per capita in industrialized Member States, these potential resources are an increasingly important source for the EU.

24. What is your idea of a major research and innovation action that would have the highest positive impact on the security of raw materials supply for the EU industries? Please specify.

We suggest to carry out strategic surveys on Member State level on resources in consumer and industrial goods, buildings and infrastructure in use as well as on raw materials in landfills (in use or closed), wastes and residues from waste treatment. These raw materials are already in the EU, their quantity can often exceed our natural stocks and their quality is frequently better and/or their concentration higher than in the original geogene stocks. Based on the analysis of quantity, quality and economic feasibility under market conditions, the appropriate technologies for exploitation of anthropogenous resources can be developed, including a know how transfer from traditional mining to urban and landfill mining.

POLICY AREA: RESOURCE EFFICIENCY & RECYCLING

27. In your view, and beyond measures already being taken (e.g. the recast of the WEEE Directive), what practical measures can be taken by the EU and by Member States to prevent the illegal shipment of obsolete end-of-life vehicles and electronic equipment?

Illegal shipment is facilitated by insufficient enforcement of existing regulations.

28. In what ways should statistics on trade in, and recycling of, products containing secondary raw materials be improved?

Statistics on secondary raw material contents fall short of the problem. An element or a material remains the same, whether produced from virgin material or from recycling. Thus, statistics should cover the material content as a whole in order to support the build-up of a comprehensive data basis on material stocks in the EU. From consumer goods to cars or industrial machinery, infrastructure as buildings, bridges or cable network grids, the raw material inventory should comprise primary and secondary raw materials as a basis for resource policy and strategic decision-making.