

European Copper Institute position paper

Public Consultation on the EU Action Plan

“Towards a Zero Pollution Ambition for air, water and soil

Brussels, 08 February 2021

The European Copper Institute (ECI) welcomes the European Commission’s ambition to prevent and remedy pollution from air, water, soil, and consumer products.

We support and echo the views articulated by Eurometaux in their response to this consultation. In this paper, we would like to further emphasize the boundary conditions for an effective Zero Pollution Action Plan, as well as share with you the copper industry’s success story of reducing the environment impact of its operation.

The new Zero Pollution Action Plan must:

- Be centred on the principle of continuous improvement of the industry’s environmental performance.
- Be coherent with the EU’s policies on circularity and climate neutrality, by recognising that a product can contribute to reduced emissions during its life cycle, or by enabling other products/sectors to improve their environmental performance.
- Ensure proportional emission reduction measures to maintain investment conditions in strategic value chains and secure global competitiveness of EU industry
- Secure an integrated approach for protection of environment as a whole, tackling the most important substances and their most important sources. Metals are naturally occurring, and so, some point sources (or diffuse ones) cannot be eliminated; therefore quantity as indicator is not the most appropriate.
- Stimulate the generation of robust and reliable data on emissions, and focus on the pollutants and the sources that matter most. Point sources as well as diffuse sources must be considered. The ECI currently researches the emissions of various natural, industrial, and product-related sources of copper into European waters. Glad to share the lessons learned.
- Aim to derive robust, scientifically sound and achievable limits for water and air quality. Improvement of air quality and water quality must be achieved in cost efficient manner.
- Reinforce existing legislation and ensure its correct implementation and enforcement instead of proposing new legislation. Existing regulations, such as the Industrial Emissions Directive, will continue to be successful to drive emissions from industrial plants down. For example, according to the [Ambient Air Quality \(AAQ\) Directives Fitness Check Final Report](#) p.52, the enforcement of AAQ Directives standards has led to a “*harmonized approach in tackling pollutant concentrations across Member States*”. There are still though some instances of exceedances of air quality standards, but “*these have decreased over time for most pollutants*” and overall, “*actions provided for by the AAQ Dir. have been effective*” (p.74).
- Chemical management shall ensure the safe use while enabling the sustainable copper production and recycling in Europe

Already before the establishment of the Zero Pollution Action Plan, the **copper industry has been, and still is, committed to continuous improvement of its impact on the environment, and has taken various actions to lower the impact.** These actions have in part been fuelled by the Industrial Emissions Directive (IED), which, through its collaborative mechanism among various stakeholders, ensures a continuous improvement in pollution abatement. The IED Evaluation Support Study¹ concluded on p.153 that *“there was strong agreement across all stakeholder types that there has been improvement in environmental sustainability since the implementation of the Directive”*.

The following examples illustrate how the copper industry has lowered the impact of its operations on the environment and continues to do so today:

1. The **Copper Mark²** is a **comprehensive, credible assurance framework** to demonstrate the copper industry’s **responsible production practices** and contribution to the United Nations’ Sustainable Development Goals (UN SDGs). The Copper Mark goes beyond compliance and focuses on continuous improvement of responsible production. While it was established only in March 2020, four of the largest European copper smelters have already committed to the initiative.
2. Our members have been continuously **investing in pollution abatement technologies**, which led to **considerable decreases in emissions of pollutants**.
 - Over the past decade, the European copper sector has cut its emissions of copper to water by 43%, and its emissions of dust to air by 54%. Further information is available on our website ³.
 - When looking further back in time, the reductions in emissions are even greater. A copper smelter in Bulgaria has reduced its emissions of copper to water by 97%, and its emissions of dust to air by 99.6%, since the year 2000⁴. This is indicative of the achievements of the EU policy on emission reductions in general.
3. Quantification of every source of copper emitted into the environment, and particularly in water bodies. ECI is currently conducting a study aiming to quantify all point sources and diffuse sources of copper into the water environment. After finalization, the outcomes of this study can be shared.

It should be remembered that a **product can also contribute to a reduction of pollution during its life cycle**. Copper enables a wide variety of clean technologies, for example battery electric vehicles. Battery-electric vehicles require three times more copper than vehicles with a combustion engine, and additional copper is required for charging infrastructure and the generation of renewable electricity to power these vehicles. These battery-electric vehicles then emit less pollutants to air throughout their life cycle.

¹ IED Evaluation – support study: https://circabc.europa.eu/ui/group/06f33a94-9829-4eee-b187-21bb783a0fbf/library/df5b7d87-2bd9-47f3-b3d3-de41d402476d?p=1&n=10&sort=modified_DESC

² The Copper Mark: <https://coppermark.org/>

³ <https://copperalliance.eu/about-us/voluntary-initiatives/emission-prevention-and-control/>

⁴ <https://www.aurubis.com/en/responsibility-x/environmental-protection-at-sites/environmental-protection-at-pirdop>



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The valorisation of by-products such as iron silicate from copper production as a secondary mineral aggregate in construction facilitates industrial symbiosis. It ensures a valuable resource is used, and at the same time it lowers the carbon footprint of construction products.

The Zero Pollution Action Plan must give due consideration to such life cycle contributions and synergies in the transition towards a climate-neutral and circular economy.

We will appreciate to be involved in further exchanges, and are happy to provide additional information on request.

European Copper Institute (ECI) is the voice of the International Copper Association (ICA) in Europe. The [International Copper Association](#), with its 35 members, represents a majority of the world's primary copper producers, some of the largest mid-stream smelters/refiners, and 10 of the world's largest copper fabricators. It aims to bring together the global copper industry to develop and defend markets for copper and to make a positive contribution to society's sustainable development goals.

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