



British Metals Recycling Association: **An Agenda for Change**



Introduction

The UK metals recycling industry is worth over **£7 billion** to the UK economy, made up of over **2,000 businesses**, and directly employing over **15,000 people**.

The industry trades and processes over 11.5 million tonnes of ferrous and non-ferrous metals every year, including steel, aluminium and copper. This includes a wide range of related products, such as end-of-life vehicles, packaging, batteries, domestic appliances, building materials and electronic goods.

The UK metals recycling industry is one of the most important players globally and is a true example of a British success story – exporting 70-80% of the metal recovered in the UK each year, totalling £4 billion.

The industry needs the support of Government to enable it to thrive for further generations to come.

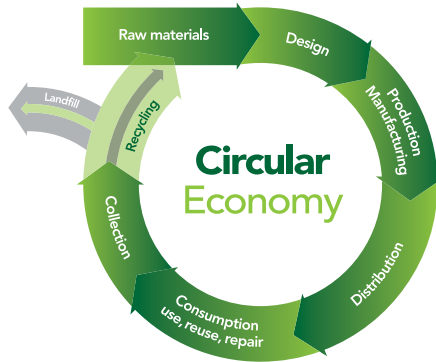
The British Metals Recycling Association (BMRA) is the only trade association in the UK representing all metal recyclers.



Image courtesy of Jansen Recycling

Supporting the global circular economy

The UK's £7 billion metals recycling industry plays a key role in the global circular economy, providing recycled metals to companies across the globe.



The industry produces over four times the current recycled metal demanded by UK manufacturers. As a result of this limited secondary metal manufacturing capacity, the UK has become one of the leading exporters of recycled metal anywhere in the world.

Being able to export metal is critical to the viability of the UK metals recycling industry.

The UK industry processes and recycles far more metal than can be utilised in UK metal production. Indeed, if UK steelmakers were to use a material mix consisting of 100%



recycled metal for all steel products, there would still be a surplus of over 4 million tonnes of recycled metal in the UK each and every year, equivalent in weight to over 57 HMS *Prince of Wales* aircraft carriers.

BMRA is calling on Government to recognise the benefits of free and fair trade for recycled materials, which exist as globalised commodities and to resist protectionist measures that would impede exports.



Extending Producer Responsibility

As the UK looks to cement its circular economy, Extended Producer Responsibility will be a central pillar going forwards. BMRA stands ready to help Government to implement a system that works for all and ensures a circular economy here in the UK. However, at present **the metals**

recycling industry is having to incur costs throughout its supply chain that should be the responsibility of manufacturers.

This includes metal recyclers having to deal with increasing amounts of hazardous waste. The disposal costs of these hazardous wastes are currently met

by the recycler, not the producer. Recent studies by BMRA, funded by industry, have led the Environment Agency to classify two further metal waste streams – non-WEEE cable and metal shredder residue – as assumed ‘hazardous’. These classifications bring additional cost, complexity and administrative burden.

Persistent organic pollutants (POPs) are also presenting an acute challenge for our industry. These substances are added during the production phase of a product's lifecycle, but the costs to dispose of them are met by the recycler. Due to the risk POPs pose to environment and human health,

the treatment options for the POPs-containing wastes are currently limited to thermal processes, which destroy POPs. The UK has extremely limited capacity to manage the existing quantities of POPs wastes. These will be overwhelmed if additional wastes are confirmed as POPs.



BMRA is calling on Government to work with industry to support additional growth in treatment facilities for hazardous and POPs wastes. BMRA also seeks establishment of a new Defra-led working group with related industries to work collaboratively to encourage eco-design. Comprised of manufacturers, recyclers and academics, its two main objectives should be to design out hazardous and POPs substances and resist the use of alternative harmful substitutes, ensuring harmonisation in similar product types across borders.

Image courtesy of Wye Valley Metals





Metals recycling industry facts:

- An industry worth £7 billion
- Over 2,000 businesses
- Employs over 15,000 people
- Trades and processes over 11.5 million tonnes of metal a year
- Exports 70-80% a year

Empowering a net zero future

The UK's metals recycling industry is a key delivery partner in helping the UK reach its net zero future. As part of this, BMRA members are committed to reducing their own emissions. Electrification will play a key role in this.

However, UK electricity prices currently act as a deterrent to electrification by pushing up the costs of doing business and putting UK recyclers at a competitive disadvantage when compared to their European counterparts.

The cost of electricity is being felt acutely across the metals supply chain. At all touch points of the value chain, whether it is processed scrap, a semi-finished or finished metal product, it is traded on an intensely competitive global commodity market. Thus, it is not possible to simply pass this higher



cost onto customers so it is often absorbed.

For UK steel manufacturers, the British Industry Supercharger, alongside other Government support, has made



the business case to move to Electric Arc Furnace technology possible.

An ambitious Government could go further, lowering electricity costs across the entire metals value chain.

BMRA is calling on Government to add the metals recycling industry to the list of key industries which will benefit from its British Industry Supercharger. And, to support the BMRA's initiative, the Scrap-Steel Working Group, which aims to facilitate technological innovation between metal recyclers and steelmakers – ensuring that all flat and long steel products' material mix can consist of 100% recycled metal.

Preparing for a battery future

As many sectors electrify, the use of lithium-ion batteries across the UK economy will increase further. There is a need to look at the long-term implications of this and to prepare the ground for dealing with these batteries as they come to the end of their life.

Lithium-ion (Li-ion) containing waste streams are already presenting challenges for operators in the metals recycling industry. Li-ion

batteries are highly combustible, particularly when damaged or defective. It is estimated that **over 1,200 fires in the waste industry are caused by Li-ion batteries each year**, with damaging environmental impacts, including harmful emissions being released into the atmosphere and contamination of fire-fighting waters. These fires present a real risk to life, lead to downtime and leave recyclers exposed to reputational and



Lithium-ion batteries are found in many everyday items, including disposable vapes

operational damage. Compounding this is limited international harmonisation on quality control, which is enabling the proliferation of imports of poor quality Li-ion batteries.



A fire at a BMRA member yard

BMRA is calling on Government to prioritise the introduction of separate kerbside collection of batteries and small WEEE by local authorities – with costs covered by revised Extended Producer Responsibility schemes.

Image courtesy of Sackers

Embedding 'green' in public sector procurement



If the UK is to be at the forefront of the green industrial revolution, reap the benefits of the green economy and reach its net zero targets, green principles must be embedded within public sector procurement.

We believe that more could be



done to support decarbonisation up and down the supply chain by creating – and maintaining – **a policy environment that encourages the production of products from recycled content.** This should be both supply-side and demand-side.



BMRA is calling on Government to introduce new green procurement rules for the public sector, setting out minimum recycled content requirements for new infrastructure projects. BMRA also wants Government to explore the feasibility of setting mandatory recycled content levels for semi and finished steels, to further encourage the uptake of recycled material. Finally, as part of any new carbon border adjustment mechanism, the BMRA would want to see a distinction between emissions associated with pre and post-consumer scrap.

Developing a deposit return scheme

Deposit return schemes are a good thing. They are set out to promote and enable recycling and adhere in principle to Extended Producer Responsibility.

However, **a flat-rate model is unfit for purpose as it incentivises plastic consumption over steel and aluminium cans.** Research has suggested that such a policy could lead to hundreds of millions of extra plastic bottles being produced.

By comparison, variable-rate deposit return schemes, as used in Denmark, Norway, Finland and Sweden, have seen far higher rates of recycling – 90% in Denmark. Under the so-called Nordic Model, a varying deposit is levied on drinks containers based on their size and material, rather than a flat rate.



BMRA is calling on Government to introduce a variable-rate deposit return scheme.



Image courtesy of EMR

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