

September/October 2025

Scrapbook



A magazine from the British Metals Recycling Association:
Run by members for members

Revised EU Waste Shipment Regulation

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BMRA Annual Dinner - book your tickets

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Don't forget to keep in touch on social media!



A word from the CEO

Ahead of the eagerly anticipated Autumn Budget, I am pleased to say BMRA has recently submitted a representation to HM Treasury.

On 26 November 2025, the Chancellor Rachel Reeves will share her Autumn Budget, updating the nation on the state of the public finances and the Government's spending and taxation plans. It is widely predicted that the Chancellor will have to reduce spending or raise taxes to avoid breaking her "ironclad" fiscal rule of ensuring day-to-day government spending is matched by tax receipts.

The Autumn Budget, like other landmark events in the political calendar is also an opportunity to influence. Every year BMRA submits a representation advocating for either a) policies which



THE BOARD

President:

Susie Burrage OBE,
Recycled Products Ltd

Large companies

(tonnage over 1million tonnes or turnover over £100m):

Simon **Gunn**, European Metal Recycling Ltd

Tony **Hayer**, S Norton Group

Paul **Wright**, Unimetals Recycling (UK) Ltd

Donald **Ward**, Ward Recycling

Medium sized companies

(tonnage 40,000-1m tonnes; turnover £10-100m):

Paul **McDonald**, ASM Metal Recycling Ltd

James **Nicholls**, C F Booth

Andy **Dodd**, ELG

Tom **Bird**, Enicor Ltd

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Graham **Davy**, Intelligent Lifecycle Solutions

Anthony **Bird**, International Metals and Cable Recycling

Steven **Robertson**, John Brocklesby Metal Management

Shane **Mellor**, Mellor Metals Ltd

Alan **Waugh**, William Waugh (Edinburgh) Ltd

improve the business environment for UK metals recyclers, or b) policies which stave off significant threats.

This year, we proposed six policy asks. The first ask of which was to urge HM Treasury to commit to not impose export impediments on recycled metal. I fully respect that many of you view export impediments as existential. So, we took this excellent opportunity to once again present Sheffield Hallam University's robust economic analysis illustrating the likely catastrophic impact of export impediments

Unfortunately, carousel and missing trader intra community fraud is also on the rise, whereby one operator in the supply chain goes 'missing' having not paid the VAT owed to HMRC. This is a problem because when the fraud is discovered, HMRC looks up the supply chain and withholds VAT payments whilst they investigate the case. To prevent these frauds, we've requested Government reconsiders introducing reverse-charge VAT.

The energy price support Government has provided to UK steelmakers is anticipated to facilitate a 169% increase in domestic demand for ferrous scrap by as early as 2030. An ambitious Government could go further

however, lowering electricity costs for BMRA members by making metal recyclers eligible for both the British Industry Supercharger and British Industrial Competitiveness schemes.

BMRA anticipates there will be reforms to Landfill Tax in England and Northern Ireland in this Budget. I therefore took the opportunity to reiterate there needs to be sufficient funding available to the Environment Agency, HMRC, and local authorities to fulfil their enforcement responsibilities, with priority given to known illegal waste sites or fly-tip hot-spots. Ring-fencing a proportion of Landfill Tax revenue to fund processing upgrades (i.e. sorting and recovery facilities) would also be welcome.

I've also encouraged the Government to introduce stronger green procurement rules across the public sector and called for a clear commitment that all revenues raised through the forthcoming Waste Crime Levy are ringfenced for enforcement activities.

I'd like to thank Liebherr for supporting this issue of *Scrapbook*.

James Kelly

CEO

james@recyclemetals.org

Technical update

BMRA MEMBER BRIEFING ON WASTE SHIPMENT REGULATION

For BMRA recyclers and exporters who export to, via, or from the European Union

The European Union's revised Waste Shipment Regulation (EU WSR) (EU 2024/1157), adopted in 2024, significantly tightens controls over the transboundary movement of waste, including recycled metal and secondary raw materials. The Regulation aims to ensure that waste exported from the EU is treated safely and sustainably, to digitise shipment monitoring, and to strengthen environmental responsibility throughout the recycling chain.

For UK recycled metal exporters, importers, and brokers, the implications of the revised EU WSR are considerable. As the UK is no longer an EU Member State, it is now regarded as a 'third-country' meaning its exports to, via, or from the EU will face stricter controls. These include requirements for notification, audit, and digital tracking starting in 2026-2027. BMRA predicts these changes will add administrative burdens, create digital integration challenges, and may result in higher costs and longer lead times.

While both the EU and UK are moving toward digital waste tracking, the EU's Digital Waste Shipment System (DIWASS) and the UK's Digital Waste Tracking (DWT) platform are being developed separately. BMRA, along with our sister organisations including the Bureau of International Recycling (BIR) and Recycling Europe (formerly the European Recycling Industries' Confederation (EuRIC)) have already raised concerns nationally and with the European Commission that the transition timeline for these new systems is tight and that technical details remain incomplete.

This briefing paper outlines (1) the main changes under the new EU WSR, (2) key implementation dates, (3) impacts on UK exporters and importers, and (4) practical steps BMRA members can take to prepare, even with limited guidance.



BACKGROUND AND PURPOSE OF THE NEW REGULATION

The revised EU Waste Shipment Regulation (2024/1157) replaces the previous Regulation (EC 1013/2006) and will be implemented in stages starting in 2026. This regulation is part of the EU's Circular Economy Action Plan. Its goals include preventing waste exports that cause pollution in other countries and improving traceability and accountability in cross-border waste movements.

According to the European Commission, the new regulation has four main objectives:

- Preventing the export of "environmental harm": this effectively means export restrictions to countries with poor/low environmental standards.
- Digitalising the control system for waste movements between EU countries and, between EU and non-EU countries via a new online Digital Waste Shipment System (DIWASS).
- Increasing transparency and improving enforcement through better cooperation among Member States' competent authorities.
- Mandating Environmental Audits: recycling facilities outside the EU that receive EU waste shipments will be subject to audit.

ABOUT: Scrapbook

The newsletter for members of the British Metals Recycling Association (BMRA). Send your news and ideas to:

Kate Magill: kate@recyclemetals.org

Or give us a call on: **01480 455249**

Scrapbook can also be viewed online:

<http://www.recyclemetals.org/scrapbook>

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UPCOMING MEETINGS/EVENTS 2025

Board meeting:

Tuesday 9 December

Annual Dinner:

Friday 14 November
The Board's activities are supported by committees that typically meet four times a year:

- Education and Training Committee
- Fires Committee
- Health & Safety Committee
- Legislative Policy Group
- Legislative Policy Group (Scotland)
- Legislative Policy Group (Wales)
- Membership and Communications Committee
- Sustainability Committee
- VAT Committee
- YBMR Committee

If you are interested in joining a committee, please contact BMRA. Please note that there are restrictions on membership for the Board and some Committees.

BMRA SECRETARIAT

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Find out more about the team:
www.recyclemetals.org/bmra-team

KEY IMPLEMENTATION DATES

The revised EU WSR took effect on May 20, 2024. However, its main requirements will be introduced in 2026/27:

Date	Event/Phase	Implication
21 May 2026	DIWASS becomes mandatory for shipments between EU countries.	Paper-based procedures are replaced with an electronic system; improved/tighter data and traceability requirements.
21 November 2026	Ban on exports of plastic waste from the EU to non-OECD countries.	Signals stricter future treatment of other wastes. May encourage UK Government to implement powers contained in the Environment Act 2021 to ban domestic exports of plastic waste to non-OECD countries.
21 November 2026	A first list of non-OECD countries authorised to import certain wastes (typically 'green list' wastes (Annex III), mixtures of 'green list' wastes (Annex IIIa) and newly-added 'green list' wastes awaiting inclusion in the Basel Convention or OECD Decision (Annex IIIb)) from the EU is expected to be adopted.	Any non-OECD country not on the list will face a ban on receiving waste exports (including 'green list'/non-hazardous wastes) from the EU from 21 May 2027 onward. The list is to be updated at least every two years, so countries may apply subsequently and be added or removed over time.
21 May 2027	New export controls and audit requirements for non-EU facilities become applicable.	UK facilities receiving EU waste or exporting via the EU will be affected.

The EU's DIWASS and the UK's DWT systems have been developed separately but will start within a short timeframe of each other. Therefore, UK operators will face simultaneous digitalisation on both sides of the Channel, with interoperability continuing to remain unclear.

The key dates for the UK's DWT roll-out are provided below:

Date	Event/Phase	Implication
Autumn 2025-Spring 2026	UK Digital Waste Tracking (DWT) pilot and beta rollout.	Early user testing for UK waste operators.
October 2026	DWT becomes mandatory for UK licensed waste sites.	Requirement for domestic tracking of waste.
April 2027	DWT scope is expanded to carriers, brokers, and dealers.	Broader digital compliance scope in the UK.

IMPLICATIONS FOR UK RECYCLED METAL EXPORTERS

BMRA predicts that the revised EU WSR will have direct and indirect implications for member companies that export to, via, or from the EU. These include:

a. Increased Administrative Burden:

UK exporters can expect to face more complicated documentation and notification procedures. Under DIWASS, all shipments between EU countries must be processed digitally. Therefore, UK exports to or through the EU will need to meet similar data standards. For mixed wastes or wastes subject to 'notification' or prior informed consent, such as complex alloy scrap, shredder residue, or electronic waste components, it can be expected that longer processing times will be needed to obtain the notifications and guarantees needed. Recycling Europe (formerly EuRIC) – of which BMRA is an active and founding member

– has warned that 'the industry faces a tight timetable and limited visibility on technical readiness'. They have urged the European Commission to grant early access to DIWASS testing environments. Likewise, our international trade body, the Bureau of International Recycling (BIR) has expressed concern that a lack of clarity on digital procedures may delay legitimate trade in recyclables.

b. Transit Risks Through the EU:

Shipments that pass-through EU territory on their way to non-EU destinations will still be subject to the EU WSR during transit. This means they will require notification and approval from the relevant Member State authorities. Any administrative delays at major ports like Rotterdam or Antwerp could slow down shipments, even if the waste is only passing through.

c. Export Restrictions to Third Countries:

By 2027, EU Member States will only be able to export non-hazardous waste to third countries that demonstrate 'environmentally sound management'. Receiving facilities will be required to pass approved independent audits, and only those listed on the EU's public register will be able to receive waste. This is relevant to recycled metals exporters that rely on EU intermediaries (for example, selling materials to EU traders who then export to Asia) could face restrictions unless all upstream facilities are audited and listed. This could disrupt traditional trade routes and increase logistics costs.

d. Audit and Compliance Exposure:

The EU's external audit scheme will indirectly affect UK operators. While the regulation mainly applies to EU exporters, EU importers and traders may require audits of UK facilities under the EU scheme to keep trading. BMRA is concerned that if UK recyclers cannot obtain this recognition, EU customers may prefer to source from compliant EU-based suppliers. Further updates will be provided as greater clarity emerges.

e. Cost and Delay Implications:

BMRA predicts that administrative lead times for shipments may rise during the initial transition period. Exporting members may experience delays of several weeks for consent to be issued as well as an increase in transaction costs due to notification requirements and other additional compliance measures. The need for dual-reporting (to DIWASS and DWT), the shift from paper-based to digital reporting, and possible audit requirements may be disproportionately burdensome on small-scale exporters/recyclers.

BMRA is in regular contact with colleagues in the Environment Agency's Environment and Business, and Waste Shipments teams to raise our concerns regarding the EU WSR and to seek assurances on its practical implications for our members.

In addition, we will be requesting high-level meetings with Defra's International Waste Shipments team to discuss ways to minimise the potential impacts of the EU WSR on UK metals recycling and exporting sector.

DIGITALISATION AND INTEROPERABILITY CHALLENGES

EU Digital Waste Shipment System (DIWASS):

DIWASS will be the main electronic platform for managing all waste shipment notifications and information exchanges within the EU. It will serve as both a central hub and an interface for (European) national systems through API-based (Application Programming Interface) interoperability. Although the European Commission's implementing regulation (EU) 2025/1290 establishes the technical groundwork for the system, its full features and test environment are not yet available.

Key stakeholders, including BIR and Recycling Europe, have expressed concern about the tight timelines for developing, testing, and integrating DIWASS, noting that there is less than a year until the use of digital systems becomes mandatory. Until the European Commission provides full access to the system's technical standards, businesses will struggle to update their internal IT systems in time.

UK Digital Waste Tracking System (DWT):

At the same time, the UK is creating its own DWT system, led by DEFRA and the Environment Agency. The main goal of DWT is to improve traceability within the UK's domestic waste

management chain, not to manage international shipments. The two systems – DIWASS and DWT – differ greatly in scope, design, and governance. However, both systems offer electronic versions of paper-based documents that could, in theory, exchange data through standardised APIs. The BIR has encouraged authorities in both the UK and EU to seek 'mutual recognition or at least technical compatibility' to avoid duplication and reduce friction for recyclers working in both jurisdictions.

The UK Government continues to review the requirements of DWT in parallel with the new EU DIWASS requirements. It acknowledges that exporters and importers in Northern Ireland will be directly impacted by DIWASS, with potential broader effects on those operating elsewhere in the UK noting that 'the effective monitoring of Green List waste exports is crucial for identifying and stopping non-compliant hazardous waste exports'. Further discussion with BMRA (and other stakeholders) is expected in the coming weeks.

EU AUDIT SCHEME: CONSEQUENCES FOR UK OPERATORS

Starting in 2027, all facilities outside the EU receiving waste from EU exporters will need independent verification to ensure environmentally sound management. These audits, monitored by the European Commission and national authorities, will evaluate:

- Compliance with environmental permits and laws
- Adequate worker protection and safety standards
- Proper monitoring of waste recovery results
- Transparency in downstream waste flows

UK recyclers receiving EU waste or providing intermediary services for EU exporters will likely need these audits. Recycling Europe has acknowledged the value of higher standards but has warned that 'without mutual recognition of existing ISO or EMAS certifications, the burden will be duplicative and costly.' Additionally, UK recycled metal exporters to the EU may find that EU buyers prefer to work only with pre-approved or audited facilities, indirectly requiring UK businesses to participate in the scheme.

Through our membership of Recycling Europe, BMRA can report that discussions are ongoing regarding the development and implementation of the audit framework that will underpin the EU Audit Scheme. Whilst decisions on the audit criteria will need to be made promptly, the current priority is to ensure that non-OECD countries notify the Commission of their willingness and ability to accept and manage wastes. Recycling Europe is seeking to influence the development of the audit questionnaires and is working with third-party auditing bodies. Further updates will be available in early 2026.

PREPARING FOR CHANGE

Although there is uncertainty over how the revised EU WSR will be implemented, or whether the UK will introduce comparable measures through domestic legislation, BMRA advises members involved in waste exports to, via, or from the EU, to take proactive steps now to build resilience and readiness.

As noted in this paper, the EU WSR will have direct and indirect implications for affected members. BMRA also considers it likely that the UK will seek stricter controls over where exported wastes end-up (e.g. third-country facility

auditing, traceability), tighter controls or export bans of certain waste streams (e.g. plastics) to non-OECD countries and, further digitisation of notifications and tracking of transboundary movements of waste. BMRA considers the following:

a. Digital Readiness and Data Integrity

Members should consider investing in digitizing their shipment records, adopting consistent waste codes (EWC/LoW), and ensuring traceability at every stage. Even without final API specifications, structured and validated data will make future integration with DIWASS or DWT smoother. Given the very tight timelines, if companies wait for complete specifications before they start their preparations, it will likely be too late.

b. Alignment with Environmental Standards

Many BMRA members already hold recognised environmental and management standards such as ISO 14001, ISO 45001, and EMAS, which are expected to satisfy the EU's audit criteria. Companies that do not yet have these certifications are therefore encouraged to begin aligning their systems and practices accordingly.

c. Scenario Planning and Risk Mitigation

Members should consider conducting an internal gap analysis to identify possible disruptions whilst approvals or notifications are obtained, as well as budgeting for the additional compliance costs from 2026-2027. BMRA is liaising closely with Recycling Europe on the EU Audit Scheme and will aim to identify and pre-qualify auditors as soon as audit criteria are published.

BMRA will also be lobbying DEFRA for bilateral recognition between DIWASS and DWT data systems. Accepting shipment records from both sides would prevent duplication and help maintain the UK's competitiveness in the European recycling market.

Should the UK decide to align more closely with the revised EU WSR in its domestic legislation, BMRA would also lobby DEFRA to ensure mutual recognition of EU-approved non-EU facility audits. Recognising these EU audits within any UK system would avoid the need for overseas facilities to submit duplicate applications for approval, reducing administrative burdens and supporting continued trade flows.

Over the next two years, the revised EU WSR will significantly reshape the regulatory landscape for waste and recycled metal shipments across Europe. BMRA members face a dual challenge: adapting to stricter EU controls while preparing for the UK's digitalisation programme (DWT), with potential future reforms adding further uncertainty.

BMRA is working with DEFRA, the Environment Agency, and our European and international partners to call for greater clarity, consistency, and coordination between UK and EU systems to minimise disruption, avoid duplication, and safeguard the competitiveness of the UK recycling industry.

Further updates will be made available to members as more information and details emerge.

Howard Bluck

Technical Director

howard@recyclemetals.org

Sponsored by:



Photography Competition

October's Photography Competition, sponsored by Recycled Products Ltd, was won by Adam Davies of R Davies Metals & Sons Ltd.

Adam kindly donated his prize to the BMRA President's charity for 2025, Stroke Association.

Don't forget winners of each bi-monthly competition are put forward to the end of year competition that is presented at the BMRA Annual Dinner.

To enter, please email your photo to kate@recyclemetals.org.

Please note the terms and conditions: www.recyclemetals.org/photo-tandc.



BMRA Annual Dinner 2025



The BMRA Annual Dinner takes place at the Royal Lancaster Hotel near Hyde Park in London on Friday 14 November 2025.

It is an excellent opportunity for you to entertain suppliers and customers, reward staff, meet old friends, and make new business contacts.

Networking event

The day starts at 3pm with the networking event, which is free for members to exhibit or attend. Meet a host of BMRA service members and enjoy a free drink. You can also take advantage of the 20% discount on all drinks (except full bottles of spirits or champagne) whilst attending the networking event. To exhibit at the networking event, email admin@recyclemetals.org.

Pre-dinner drinks

Join the pre-dinner drinks reception from 6.30pm ahead of the sit-down meal commencing at 7.30pm.

The price of the dinner is £255 plus VAT per person.

For more information about how to book tickets and accommodation, members can visit <https://tinyurl.com/AD-2025-booking-info> (login required).

For any questions, please email admin@recyclemetals.org.

Sponsorship

Take the opportunity to promote your business through one of the many sponsorship opportunities on offer. All sponsors will be offered the chance to advertise in the menu booklet which is given to all attendees on the evening. Where possible, all sponsors have visible advertising on the night. Sponsors are also acknowledged on BMRA social media channels, the BMRA website and the printed magazine, *Scrapbook*.

BMRA President's charity 2025

The President's nominated charity for 2025 is the Stroke Association. Proceeds from the raffle and silent auction will be donated. Details on how to take part will be available on the night.

In aid of



New Equipment Sales sponsor



Thanks to the generous support of Green Car Depollution as the sponsor of BMRA's Equipment for sale, we can offer the advertising of equipment free of charge to BMRA members.

If you have a piece of equipment you would like to offer for sale via the BMRA email admin@recyclemetals.org.

The Government Reshuffle and opportunity for new relationships

There had been rumours of a ministerial reshuffle in government for several months, seemingly delayed on a number of occasions because it was never the right time.

The Prime Minister's hand was well and truly forced in September following the resignation of the Deputy Prime Minister and Housing Secretary, Angela Rayner, following a ruling from the Prime Minister's Independent Adviser on Ministerial Standards that she did not uphold the highest standards by failing to apply for expert tax advice on the purchase of her second home in Hove.

When it came, the reshuffle was billed as the start of a second phase of the PM's administration – one that is focused on delivering change that ordinary people feel in their daily lives and in their pockets. The initial tranche of the reshuffle, focussing on the Cabinet roles, was mostly a case of the same notes being played in a different order – four left the Cabinet entirely, while ten members of the Cabinet moved to new roles.

This included the Secretary of State for Environment, Food and Rural Affairs, Steve Reed – who replaced Rayner as Housing Secretary and was in turn replaced by Emma Reynolds who steps up to her first Cabinet role.

Emma Reynolds is promoted to become the new Secretary of State for Environment, Food, and Rural Affairs. Formerly Economic Secretary to the Treasury, she replaces Steve Reed in a move that is largely seen as a 'stepping stone' role – the highly rated former Treasury Minister and city lobbyist is seen as being someone who can bring an eye for the business impact of environmental reform to Defra, though whether her long-term future is in the department or elsewhere remains to be seen. She leads the first ever all-female ministerial team in UK government history, with key Minister Mary Creagh remaining in post as Minister for Nature (incl waste and resources) – though she now gets paid for doing the job, having previously accepted the role without the Ministerial salary top-up because of her interest in the policy area (there are a limited number of paid ministerial roles, currently fewer than the number of ministers).

Outside of Defra, the most significant appointment, for the role of Minister for Industry, came later than the rest of the appointments as it became clear that the reshuffle hadn't been as seamless as hoped. The Energy Minister, Michael Shanks, was promoted to the joint role of Minister of State in both the Department for Business and Trade and the Department of Energy Security and Net Zero – a role that previously was the Industry brief held by Sarah Jones. However, days later, Shanks announced in Parliament that he would continue to be Energy Minister, which he said was "the only job he'd want in Government". A day later all mentions of Shanks taking the joint DBT/DESNZ role were erased from the Government website and social channels, and Chris McDonald, formerly of Materials Processing Institute, was quietly appointed Minister for Industry.

Chris' appointment is a positive one for the metals



New Secretary for State for Environment, Food and Rural Affairs, Emma Reynolds MP

recycling industry in that he has been in and around the metals sector for a number of years and has a positive relationship with the BMRA team. This means he will take less time than many new ministers to get up to speed – vital at such an important time for the sector as the steel strategy evolves.

Reshuffles are both a frustrating time for public affairs professionals – in that we need to reintroduce ourselves to fresh ministers who often are new to their brief just as the outgoing minister has got to grips with the job – but also an opportunity to restart relationships with Government, and attempt to influence views early. Cavendish has been supporting the BMRA team to reach out to the relevant new ministers across Defra and DBT to introduce the sector and its importance to the economy and industrial strategy, and hope to secure briefing meetings in the near future.

David Button
Associate Director
Cavendish

Further update for operators using T9 exemptions

The Environment Agency (EA) has confirmed that the T9 waste exemption for recovering scrap metal is still available for registration.

The proposed reforms to exemptions, when enacted, means that in future an environmental permit would be required. The EA has clarified that, although Government has reiterated its plans to reform the waste exemptions system, which include plans to remove the T9 waste exemption, operators can currently continue to use the T9 exemption.

Operators with T9 and S2 exemptions can renew them together and when the time comes to apply for a permit, the permit application can cover all relevant waste types.

Despite contrary information reportedly provided by some independent consultancies, operators DO NOT have to apply for an environmental permit yet, if they are meeting the exemption requirements. No action is required before waste exemption reforms come into force unless your current activities exceed the exemption thresholds or you are undertaking an activity (e.g. mechanically fed shearing) that is not covered by the T9 exemption. There will be transitional arrangements which would allow operators 3 months to make the necessary permit application when the legislation comes into force. The EA will contact exemption holders when waste exemption reforms are likely to come into force.

An EA spokesperson said "For now, T9 exemption



operators can still register or renew their exemptions and get their business ready for the waste exemption reforms. There have been no changes in law yet, we will keep waste exemption operators and trade associations such as the British Metal Recycling Association updated on the progress. However, T9 exemption operators will now (from July 2025) need to pay for their waste exemptions when they are registered for the first time or are renewed".

Antonia Grey, BMRA's Head of Policy and Public Affairs said "As soon as the EA/DEFRA let us know the timeline for reforms, we will inform members about the changes. In the meantime, we will continue to work with the EA to help develop the best permitting approach for the T9 exemption and improve other scrap metal standard rules permits".

EA publishing CAR forms online

On behalf of the Environment Agency

Following the launch of the proactive publication of water discharge activity CAR forms in spring 2025, we are now moving on to waste and installation permits.

It is important to note that this is a process change, not a regulatory change. CAR forms for permitted sites are public register information and have always been available for inspection upon request. The change is that they are now available online without having to request them.

Forms submitted from **18 August 2025 onwards** have been live since **29 September 2025**. This is for a holding period of 42 days between a form being written and its appearance online. This allows for possible appeals, in line with our regulatory appeals process. CAR forms written before the go-live date will not be placed online but will continue to be provided on request.

CAR forms are public register documents that need to be available for public inspection. Until now, we have met this obligation via the public contacting us and requesting copies. In our continuing journey towards increased transparency, and to reduce the volume of information requests EA staff must handle, we have started proactively



**Environment
Agency**

publishing these forms online. This move is part of a wider strategy around regulatory changes and increased transparency and supports the Government's growth mission.

We will add more CAR forms to the online public register in the future across all sectors; this phased approach ensures we manage the process effectively whilst balancing public interest with practical delivery.

From Spring 2025, the Environment Agency (EA) began to publish Compliance Assessment Report (CAR) forms for those we regulate under the Environmental Permitting Regulations 2016 to the Public Register Online: <https://environment.data.gov.uk/public-register/view/index>

Moving towards a greener future

While not mandatory for all businesses currently, it is increasingly common that businesses – of all sizes – measure their scope 1 and 2 emissions.

In line with this trend, and against the backdrop of a legally binding net zero target in the UK, the BMRA established the Sustainability Committee to work alongside members to promote best practice and signpost pragmatic solutions to achieve decarbonisation.

The BMRA Sustainability Hub is where this all takes place. It is an exclusive member area, offering a single place for BMRA members to measure emissions, identify emission hotspots, learn and implement carbon reduction methods, and access carbon offsetting.

The flagship product of the Hub, and a bespoke resource for BMRA members, is the sector-specific Carbon Calculator which enables you and your organisation to measure scope 1 and 2 emissions – the emissions that are under your direct operational control and the most able to change.

BMRA's Sustainability Committee, led by Cameron Leitch, BMRA's Policy and Sustainability Manager, and Committee Chairman, Mike Hogan of EMR, has been at the forefront, to continue to curate this benefit for members.

More recently, the Sustainability



Committee has been working to produce a *Roadmap to Net Zero*. This document will detail how the metals recycling industry can achieve net zero, whilst advocating for policies which will enable the transition, particularly for emissions that are difficult to reduce, such as transport emissions, or where the solution to reduce emissions is currently cost-prohibitive, such as connecting to the electricity grid.

Donna Rogers, Partner at Rogers Metals Management LLP based in Oxfordshire, a small metal recycler processing approximately 4,500 tonnes of metal a year.

"The Sustainability Hub has been a very helpful resource and assisted us in

identifying areas to consider within our business where we can make carbon reductions as well as monetary savings.

The Carbon Calculator has enabled us to pinpoint areas for improvement, even down to how lorries are being driven and changing lightbulbs.

As a single site business we have managed to make savings in CO₂ by making what seem like small changes. It really does make an overall difference."

The tool is FREE to use as part of BMRA membership and relevant to your business no matter your size. If you have any questions you can speak to the

To access the Sustainability Hub, visit: www.recyclemetals.org/sustainability-hub-home.html

Grid connections and upgrades

BMRA has partnered with Vattenfall IDNO, who offer businesses a way to save time and money when securing new or upgraded electrical grid connections.

Large scale electrical grid connections were historically provided by the local Distribution Network Operator (DNO) in your area who, as the only provider, offered non-negotiable – and often prohibitively expensive – quotes to connect businesses to the grid.

Now the rules have changed. As an Independent Distribution Network Operator (IDNO), Vattenfall is able to connect businesses to the grid in any area of the UK and also offer businesses cash back for new grid connections



known as 'Asset Adoption Value' payments.

Asset Adoption Value payments can significantly reduce the cost of connecting to the grid. Plus, Vattenfall can often accelerate the grid connection process, helping you to avoid delays and secure reliable power as quickly as possible.

As the UK moves towards net zero most businesses will require more electricity as they phase out fossil fuels, which is increasing demand on the grid and competition for the available power.

Vattenfall IDNO understands the grid connections environment in detail and, as a leader in sustainability, is keen to support UK businesses as they transition to net zero.

If you are not confident about managing the grid application process Vattenfall IDNO are offering BMRA members free grid connection project assessments to help you understand the process, and potential pitfalls, of securing an upgraded grid connection.

Find out more at <https://idno.vattenfall.co.uk/> or contact Lee Scarth, and mention BMRA if you get in touch. Lee Scarth, Business Developer, iDNO, Lee. Scarth@Vattenfall.com, 07974 118324

Energy management



BMRA has partnered with Enexus, who offer members the ability to save time, money, and meet business objectives with a smart, simple, sustainable approach to energy management. You will be appointed an energy expert with over 10 years' industry experience as your account manager. Their role is to become your energy partner and gain an in-depth understanding of your unique operations in order to develop procurement and energy saving strategies that meet and exceed your unique business goals.

With business energy soaring in recent years, and business water costs due to

soar in the next three years – starting in 2026 – Enexus aim to perform a full market comparison, ensuring you have access to the most competitive rates, thus hopefully helping your business save money!

As well as supporting you with the day to-day queries and supplier management, our experts routinely assess your usage, consumption, and waste, looking for new opportunities to ultimately help you spend less on business energy.

As part of its member benefit offering, all BMRA members can get a free energy

audit from Enexus which includes:

- Desktop survey of energy efficiency
- Contract structure review
- Price review
- Availability capacity review (most businesses pay too much for availability and by streamlining this, can save almost immediately)
- Green/Net Zero options
- Carbon Offsetting strategy
- REGOs, Green Gas Certificates

To speak with Enexus and arrange your free Energy Audit you can email: info@enexusenergy.co.uk call: 01253 966960 or visit: www.enexusenergy.co.uk.

Carbon offsetting



ClimatePartner has agreed to offer high-quality climate projects to BMRA members. Discounts are available on selected projects and more competitive pricing is possible for larger volumes.

ClimatePartner supports companies in the essential steps of climate action: measuring carbon footprints, decarbonising, financing climate projects, and communicating transparently. In doing so, it draws on its experience working with over 6,000 clients and its custom software for calculating and

managing carbon emissions.

Climate projects play a decisive role in combatting global warming by demonstrably reducing or avoiding greenhouse gas emissions. This is achieved through protecting existing forests, reforestation, expanding renewable energy supplies, or various other technologies.

Climate projects promote sustainable development in the project regions, for example by improving access to clean drinking water, upgrading local

infrastructure, creating jobs, or preserving biodiversity. The UN's 17 Sustainable Development Goals (SDGs) are a globally recognised benchmark to measure the positive impacts of these projects. The goals include fighting poverty and hunger, promoting education and employment, and increasing access to clean and affordable energy.

Reach out to oliver.allcock@climatepartner.com to find out more.

Please note, BMRA receives no payment for introducing members to its partners, and any commercial agreement is strictly between the BMRA member and the third-party partner. Please ensure you read all small print ahead of signing any agreement as the BMRA accepts no liability for any business relationship a BMRA member enters into.

Carbon reduction services

BMRA has partnered with Tunley Environmental, a leading sustainability consultancy firm dedicated to providing expert advice and support for biodiversity and carbon reduction initiatives.

With a focus on sustainable development, the company offers a range of services to assist clients in achieving environmental compliance and a sustainable future.

Their team of scientists provide high quality Net Zero Assessments, Product Carbon Assessments, and Biodiversity Assessments. All of which are designed to help create a real sustainable difference

throughout your whole business, enabling you to reduce and offset your carbon footprint or show your impact on nature.

Additional services include Green Marketing Support and Carbon Reduction Training, as well as covering the carbon measurement requirements for lucrative government contracts.

As part of its member benefit offering, all BMRA members can get a discounted rate for Tunley Environmental's services, which include:

- Carbon Reduction Assessment & Net Zero Roadmap
- Carbon Management Planning
- Carbon Reduction Training



- PPN 06/21 Report
 - Green Marketing Support
- Contact Tunley Environmental to learn more:
Telephone: +44 (0) 1924 692099 Email: info@tunley-environmental.com
Website: <https://www.tunley-environmental.com/>
LinkedIn: <https://www.linkedin.com/company/tunley-environmental/>

Carbon Literacy Training and more

Positive Planet is a sustainability consultancy helping BMRA members lead the way in Environmental, Social, and Governance (ESG).

It provides complete 360° support - from carbon measurement and impact reduction to training and reporting - empowering your business to achieve measurable, lasting results.

The metals recycling industry is already driving the circular economy. Now it's time to make that impact visible. Positive Planet's blend of expert consultancy and powerful digital platforms simplifies sustainability.

It will help you measure your footprint, improve performance, and engage your teams to build a stronger, more sustainable business.

Join the growing number of UK recyclers making sustainability their competitive edge. Book your free consultation today at: www.positiveplanet.uk/contact-us

positive
planet

Energy support and grant funding opportunity - West Midlands

Rising energy costs continue to impact businesses, but there's help available.

The Business Energy Advice Service (BEAS) is a government-funded pilot programme supporting small and medium-sized enterprises to cut energy bills, reduce energy use, and lower carbon emissions.

Led by Aston University across the West Midlands and neighbouring regions, BEAS has already supported more than 1,800 businesses.

What's included completely free for eligible SMEs:

- A free on-site energy assessment
- A tailored report with practical, cost-saving recommendations
- Access to a match-funded grant of £1,000 to £100,000 to implement energy-efficient upgrades

Whether it's upgrading your lighting or other energy systems - BEAS helps you take action and access funding.

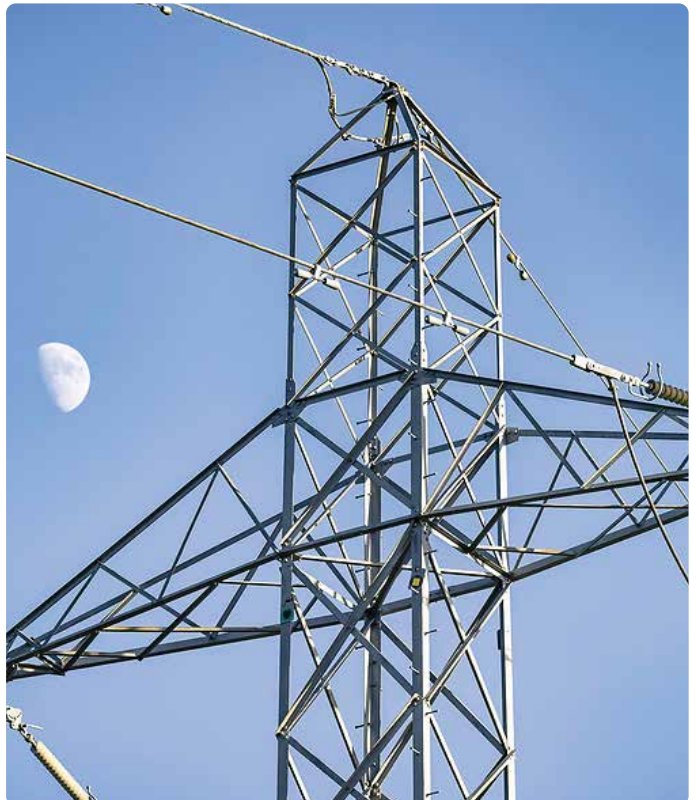
ARE YOU ELIGIBLE?

The programme is open to businesses that:

- Are based in the West Midlands or neighbouring areas
- Have fewer than 250 employees
- Turn over less than £42 million annually
- Use at least 25,000 kWh of energy per year

This pilot programme runs until March 2026, but the sooner you act, the sooner you can start saving. Check eligibility and register here: <https://bit.ly/BEAS-RegisterNow>

For more information, contact: decarb@aston.ac.uk



Changes to energy costs - how to mitigate rising costs

An article by BMRA energy partner Enexus Energy

As a partner of the BMRA, we wanted to update members on changes that are due to be implemented across the industry that will likely have an impact on operators in the metals recycling industry – possibly quite profoundly (dependent on consumption).

Electricity is broadly made up of 3 groups of charges.

1: Government levies.

2: Grid charges.

3: The electricity itself.

In the last few weeks, the market has been blindsided by a new government levy and an increase in grid charges. So, consumers will be hit with a double hit of increasing costs.

Government Levy - Nuclear Regulated Asset Base (RAB)

This is a new charge being introduced to help pay for the construction of Sizewell C Nuclear plant in Suffolk. All consumers will pay for this on top of their electricity rates. The UK needs extra, stable electricity generation as we continue to use more as a country and, to build it, it needs to be funded. This charge helps fund that construction.

Almost all consumers will pay an additional 0.35p/kWh on top of their electricity rates. And this is the important part: while guidance has not come from all suppliers, we are expecting that they will all start showing this as a separate line item on bills from November 2025 onwards. That includes businesses that already have contracts agreed at a fixed rate for this period.

Grid Charge - Transmission Charges (TNUoS)

This is essentially the cost of getting electricity from where it is generated (e.g. offshore wind, hydro plants in rural areas) to where it is needed (urban/industrial centres). The network has long needed investment in this area, and suppliers were estimating an increase in these charges by an average of around 25% from April 2026. The actual increase is more like 50%.

These are complex charges that have a lot of different variables. But broadly speaking you will see an increase in standing charges for fixed contracts from 2026 onwards. How much by? Difficult to say as every site is charged differently, but here a few examples we have seen when helping clients recently.

Client 1:

Offer sourced August: £4.20/d standing charge

Offer sourced recently: £6.80/d standing charge

Client 2:

Offer sourced August: £37.03/d standing charge.

Offer sourced recently: £50.40/d standing charge

Client 3:

Offer sourced August: £98.06/d standing charge.

Offer sourced recently: £173.84/d standing charge

So it is early days yet, but early examples suggest a sizeable increase in standing charges from 2026 onwards.

All suppliers have clauses in their contracts that allow them to 'unlock' rates if charges are greater than anticipated. While



suppliers don't want to do this, they may have to. We have started seeing some smaller suppliers already announce that they will be adding costs to already in place contracts, and we expect more to follow suit.

What can customers do?

If they qualify for the government's EII scheme they will be exempt from this charge. For TNUoS charges, there is no avoiding, but they may be able to mitigate. A TCR banding change may be able to lower their standing charge to a more appropriate level, resulting in a lower standing charge and thus lower bills.

So overall, a difficult period to manage for business energy consumers. All members are more than welcome to get in touch with us to see if we can help with an EII application or lowering standing charges and other ways we can help mitigate these rising costs.

How Enexus Energy can help

At Enexus Energy, we specialise in helping businesses in the metals recycling sector reduce electricity costs through strategic procurement, energy audits, and efficiency improvements.

As part of its member benefit offering, all BMRA members can get a free energy audit from Enexus which includes:

- Desktop survey of energy efficiency
- Contract structure review
- Price review
- Availability capacity review (most businesses pay too much for availability and by streamlining this, can save almost immediately)
- Green/Net Zero options

Get in touch today to arrange a free energy review and discover how much your business could save.

Email: info@enexusenergy.co.uk

Call: 01253 966960

State of the Metals Industry in the UK Report 2025/2026

The UK Metals Council has launched its State of the Metals Industry in the UK 2025/2026 report, a comprehensive snapshot of the challenges and opportunities facing one of the country's most critical industrial sectors.

The report captures the views from across the supply chain and highlights key themes around skills, energy costs, trade, and the future of the UK's industrial strategy.

Skills and Labour Shortages

Skills shortages remain the top concern, with over 80% of companies reporting they are recruiting from a limited pool of qualified candidates. More than half (58%) say they struggle to attract new workers, with many pointing to the Apprenticeship Levy as a barrier rather than a support.

Energy Pressures

Energy costs remain a critical issue. Almost 60% of firms back a unified energy pricing mechanism across UK foundation industries, and many are investing in energy efficiency, renewables, or contract renegotiation to cope with volatility.

Call for Minister for Manufacturing

One of the strongest findings is the call for government to create a dedicated Minister for Manufacturing. Nearly half of respondents (45%) ranked this as a top priority, alongside more than 63% who want to see a cross-sector Industrial Strategy reintroduced. Rachel Eade MBE, Chair of the UK Metals Council, said:

"Our industry is clear: we need political leadership at the highest level that understands manufacturing and is prepared to fight for it. This report sets out six urgent asks to government, including action on energy pricing, apprenticeships, and Net Zero clarity. The launch is the start of our renewed push to make sure these voices are heard."

Six Key Asks

The report outlines six main recommendations for government:

1. A cross-sector Industrial Strategy.
2. Reform of the Apprenticeship Levy.
3. Energy stability and fair pricing.
4. Clearer Net Zero targets and guidance.
5. Simplification of post-Brexit paperwork, including CBAM compliance.
6. Appointment of a Minister for Manufacturing.



A resilient sector

Despite economic uncertainty, nearly 44% of metals companies remain positive about growth over the next 12 months, showing resilience and determination to invest in people, skills, and innovation.

The launch event was on 10th September at the UK Metals Expo in Birmingham and feature a high-profile panel debate with industry leaders. BMRA's Antonia Grey sat on the launch panel. The UK Metals Council represents 13 trade associations, one of which is the BMRA, across the full metals supply chain, speaking for more than 11,500 companies and over one million employees.

Read the full report: <https://tinyurl.com/metals-industry-25-26>

VAT Committee

BMRA is seeking new members for its VAT Committee, which supports the Secretariat in its work lobbying for reverse charge VAT.

The Committee will also help the BMRA Secretariat to

provide guidance on all relevant VAT issues such as: Missing Trader Fraud; MTIC or Carousel Fraud and sharing best practice for KYC checks.

The Committee is only open to ordinary members and limited to one representative per company.

If you are interested, please send an email to antonia@recyclemetals.org

BMRA at UK Metals Expo and CARS/MRE 2025



It was a busy two weeks at the start of September for the BMRA Secretariat. BMRA exhibited and BMRA's Antonia Grey and Cameron Leitch spoke at the UK Metals Expo and the newly re-located CARS & MRE, which both took place at the NEC, Birmingham.

BMRA is delighted that Policy and Sustainability Manager, Cameron, has, once again, been named in the letsrecycle.com 35 under 35 list, recognising talented young professionals driving innovation, leadership and positive change across the industry. We are sure you agree that Cameron's efforts within the BMRA, not just in policy and public affairs, but also in sustainability and being the Secretariat lead for YBMR, deserve this recognition.

Both Cameron and Antonia sat on panels at the two events, with special thanks to BMRA member representatives, Mike Hogan and Donna Rogers, as well as Nathan Wood of BMRA Sustainability Hub partner, Tunley Environmental for discussing sustainability and net zero, and Will Eadson of Sheffield Hallam University for joining at short notice to discuss the recently released export report, both BMRA chaired panel sessions at CARS/MRE.

Antonia and Cameron also sat on panels alongside BMRA members and fellow Associations at the UK Metals Expo. Antonia discussed the State of the UK Metals Industry Report & Opening Remarks (see page 10 for full information on the report) and Cameron sat on the From Missed Opportunities to Strategic Value: The Role of Aluminium Scrap in UK Industrial Growth panel.

It was great to say hi to those BMRA members who exhibited, presented and we met while they attended the show.



Life on the Yard: Chris Humphries

Chris likes a sunny day, and one of the best things are his staff, who help make the business successful.


Name:

Chris Humphries, Automet

Job title:

Executive Director

Time spent in recycling/current role:

20 years

What does your job involve:

My job role is as a top-level leader responsible for driving the company's success and ensuring its profitability. I develop and implement business strategies, oversee operations, and manage relationships between other Directors and employees. My role is crucial for achieving the company's goals and maintaining a healthy bottom line.

Hardest part of the job:

Getting let down for scrap, and haulage is a killer!

What three things help you to do your job better:

- I have an excellent workforce who know their jobs and perform them well.

- Sunny days always make my job better.

- Good scrap, you can't beat a good load!

What are you most proud of in your career:

I have had the pleasure of working with my dad who brought me up around metals and has taught me everything I know about recycling and the business.

What are the best and worst things about the metals recycling sector?

Code changes, new tax laws and haulage are the worst things in a metal recycling centre.

Bank holidays could be the absolute best thing in a metal recycling centre. Also, our customers and staff make this business successful. Did I mention the good scrap and hidden gems we find on the site everyday?

What is the best advice you have ever received?

Don't pay too much money for scrap!

QUICK FIRE ROUND:
Out on the town or a night in front of the TV?

Out Out like James Dean!

Coffee or tea?

Tea

Winter or Summer?

Summer

Marmite - Love/Hate?

Hate

Invisibility or Flying?

Flying.



Thanks to Chris for sharing his Life on the Yard with us. If you would like to share yours, please contact: kate@recyclemetals.org

Unusual finds on the yard

The unusual finds continue to uncover some brilliant items, and treasures we can't believe people have parted with (maybe some we can understand!).

Thanks once again to our long-standing sponsor, City Metals Recycling, for their continued support of this popular feature.

Send a hi-resolution image (minimum 1MB) to:

kate@recyclemetals.org.

See some of the past unusual finds by visiting:

www.recyclemetals.org/unusual-finds

1. A brass walnut locket sent in by **Antony Bateman** of Alwin.
2. An elephant sent in by **Scott Newell** of Newell Recycling

Equipment. Scott says: "I found this elephant made from copper slag on my first day as manager of Newell Salvage Company of Phoenix, when I was 20 years old, which is now 65 years ago. This elephant has been on my desk every day since that time. It brings me pleasure to look at it and to consider its long life. I hope that it brings some pleasure to you also."

3. School sign sent in by **Hayley Mellor** of Mellor Metals.
4. There is no doubt we LOVE metals recycling, but it looks like the metal is saying it back to us! Found on the ground in the yard by **Steve Cullen** of Multimetals Recycling Ltd in Wicklow.



Member news in brief

www.recyclemetals.org/news

Hassells named company of the month

E H Hassell & Sons (Hassells), has been named **Waste Management Manufacturing & Engineering Company of the Month** by **Sustainability Today**.

A fourth-generation, family-run business with over 50 years of experience, Hassells' reputation is built on providing industry-leading equipment, expert engineering support, and tailored waste management solutions across the UK.

Read the full feature in the June edition of Sustainability Today to discover more about its journey, its team, and how it is driving innovation in the waste and recycling industry: <https://sustainabilitytoday.co.uk/latest-issues>



TOMRA Recycling and Novelis webcast

A recent webcast titled 'From AI to Dynamic LIBS: How new sorting technologies drive growth in aluminium recycling,' hosted by TOMRA Recycling in partnership with Novelis, unveiled groundbreaking advancements in aluminium recycling technologies.

Emphasising that greater aluminium scrap utilisation can significantly lower CO₂ emissions, the webcast showcased the transformative impact of the latest sorting technologies on aluminium scrap, highlighting the considerable business opportunities these innovations present for aluminium recyclers and processors.

Experts from TOMRA Recycling



and Novelis discussed the typical challenges in aluminium recycling and how the latest technologies – X-ray transmission (XRT), Dynamic LIBS and deep learning – are optimising sorting processes, enhancing the purity of aluminium scrap fractions and creating new market opportunities.

Access the full webcast recording here: <https://www.tomra.com/aluminum-webcast>

Navigating currency volatility

Every quarter, Lumon Corporate, provide updates to BMRA members about what macro-economic events may cause currency volatility. Events such as the influence of UK, Eurozone, and US economic policies in the second quarter (Q2) of 2025: the impact of the UK government's Spring Statement; the European Central Bank's (ECB) monetary policy in the face of recession fears; and Donald Trump's divisive trade tariffs, can all have an impact.

The Q3 report included:

- Expert forecasts and specialist analysis on GBP, USD and EUR FX market movements in Q3 and beyond
- Actionable, strategic insights into how volatility could impact your business'



bottom line

- An easy-to-follow, seven-point checklist to assess your FX approach for Q3

BMRA members can find these updates via the BMRA website, searching Lumon, or by visiting <https://www.lumonpay.com/corporate/>

Three Bunting ElectroStatic Separators for Universities

Research into the separation and recovery of fine metals from waste materials, such as batteries and electronics, is driving a growth in orders for Bunting's laboratory-scale ElectroStatic Separators. In May 2025,

Bunting Magnetics, completed the manufacture of three laboratory-scale ElectroStatic Separators destined for research bodies in the UK, Finland and Morocco.

An ElectroStatic Separator exploits the difference in electrical conductivity between various materials in a feed material to produce a separation.

The ability to produce a separation depends on a number of key material characteristics including a material's conductivity, moisture content and particle size range.

In operation, the ElectroStatic technology uses conductivity differences between insulators (e.g. plastics) and conductors (e.g. copper

and aluminium) to obtain a separation on an earthed roll. A controlled mono-layer flow of material is fed via a vibratory feeder onto the earthed roll. Whilst the insulators are pinned to the earthed roll via an image force, the conductors lose their charge and are thrown from the roll by the centrifugal force generated by the rotating roll. Certain degrees of separations is also possible between particles of different conductivity.

“We are witnessing a growth in the range of applications for the ElectroStatic Separator,” explained Professor Neil Rowson, Bunting Magnetics’ Laboratory Manager. “Often the ElectroStatic Separator is only considered when all other separation avenues have been exhausted. We are working closely with many Universities, research institutes and companies, assessing and further developing this technology to successfully solve exceptionally difficult separation problems.”



Eriez introduces new models in its Suspended Electromagnets line

Eriez has announced the launch of its new SEV series of Suspended Electromagnets, representing a significant advancement in suspended electromagnet design. These units feature stronger magnets housed in smaller enclosures, reducing overall weight and installation costs while optimising performance efficiency.

Integrated into the Eriez SE7000 line, the new SEV models leverage cutting-edge wire and conductor technology

to energise the magnet circuit, also requiring less coolant for operation. The new wire configuration, boasting an ultra-thin anodised insulation layer, provides superior thermal conductivity, ensuring high heat dissipation within the circuit for improved magnet performance. Despite the compact size, these magnets deliver performance that surpasses larger counterparts, guaranteeing consistent and reliable operation.

Dave Heubel, Eriez Global Magnetics Product Manager, emphasises the practical benefits of the SEV series’ innovative design: “As part

of our commitment to continuous improvement, we’ve succeeded in packing more magnet strength into a smaller footprint, thereby lowering costs and boosting productivity for customers through streamlined installations and more stable, dependable performance.”

Eriez also offers self-cleaning versions of all SEV models. Additionally, a variety of options are available, including dust hoods, coils derated for elevation, high fire point coolants, armor-clad belts and numerous other customisable features for every unique application.

Scrap? We've got the metal

Not any old iron will do when it comes to scrap. Liebherr is built for the job.

LIEBHERR

Scrap handling machines



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