TRADE & RECYCLING

EU draft would curb metal-scrap exports to India

Aluminium, copper and steel scrap are excluded from India’s proposed permissions. Specified paper, rubber and textile wastes retain a route.

PROPOSAL PUBLISHED 18 SEPTEMBER

Indian recyclers could lose access to EU metal scrap under a draft list published by the European Commission. The new export regime applies from 21 May 2027.

The draft says India has not demonstrated the measures needed for environmentally sound management of metal waste. This assessment remains open to consultation.

B1010

Key metal-scrap code

✓ Earlier route*

✗ Draft: excluded

*Subject to applicable controls.

A DEADLINE FOR INDUSTRY

Importers and recyclers have until 16 October to put evidence before the Commission, ahead of a decision on the final list.

SUBMIT FEEDBACK BY 16 OCTOBER

Proposal under consultation

The proposed trade position

EU-to-India exports for recovery | Selected waste streams

✓ Export route available, subject to controls. ✕ Prohibited / not authorised.
The draft column shows the position from 21 May 2027 if adopted unchanged.

MATERIAL / WASTE	BASEL CODE	EARLIER RULE[1]	2026 DRAFT[2]
Iron & steel scrap	B1010	✓	✕
Aluminium scrap	B1010	✓	✕
Copper scrap	B1010	✓	✕
Nickel, zinc & tin scrap	B1010	✓	✕
Specified zinc dross / Al skimmings	B1100 (part)	✓	✕
Paper & paperboard	B3020	✓	✓
Self-adhesive label laminate	B3027	✓	✓
Rubber waste / scrap	B3040 / B3080	✓	✓
End-of-life tyres for recovery	B3140 (part)	✓	✓
Untreated wood & cork	B3050	✓	✓
Specified textiles / waste carpets	B3030 / B3035	✓	✓
Glass cullet (excluding CRT glass)	B2020	✓	✓
Waste edible fats & oils	B3065	✕	✓
Non-hazardous acidic/basic solutions	B2120	✕	✓
Tar-free asphalt waste	B2130	✕	✓
Insulated metal cables	B1115	✕	✕

[1] Regulation 1418/2007, India schedule as amended by 2022/520. Ticks identify a conditional export route, not unrestricted import approval. [2] Draft annex of 18 September 2026; detailed entry descriptions govern.

Newly listed entries do not override Indian import restrictions. This is an EU export comparison, not a complete India import-permission list.

INSIDE THE PROPOSAL

Why metals are singled out

Pollution controls and treatment standards underpin the assessment.

THE EU'S CASE

Recital 3 points to heavy-metal hazards and emissions from shredding, smelting and refining. It calls for closer scrutiny of metal-waste requests and evidence of equivalent environmental protection.

THE INDIA FINDING

Recital 9 accepts India for the specified non-metal streams but proposes no authorisation for metal waste. The annex determines the exact codes and descriptions covered.

HOW THE APPROVAL TEST CHANGES

Earlier framework

Country responses determined prohibition, notification or national controls for each waste entry.

New framework

Country-and-waste listing requires evidence of environmentally sound management. Receiving-facility audits are a separate requirement.

The draft sets 21 May 2027 as the application date and identifies 21 November 2026 as the deadline for establishing the list. The proposed list has not yet been adopted.

INDIAN RECYCLERS & SCRAP BUYERS

Respond before 16 October

Map affected codes and EU purchases. Assemble permits, process controls and residue records. Submit evidence through the consultation portal.

OPEN THE CONSULTATION →

BUSINESS IMPACT

Indian buyers face a sourcing rethink

The impact will depend on each buyer’s reliance on EU material.

EU-dependent buyers face the first test

For businesses buying EU scrap, the immediate task is to identify exposed volumes and contracts. Any increase in procurement costs would depend on the grade required and the availability of replacement supply.

Domestic recovery could gain demand

Reduced access to imported scrap could bring more buyers into India’s domestic market. That would favour collectors and processors able to deliver consistent grades, reliable volumes and traceable material.

Waste classification remains decisive

Recovered metals, battery materials and black mass do not all fall under B1010. Their composition and waste status determine the applicable entry. This proposal does not open an import route for EU e-waste.

SOURCE DOCUMENTS

Draft act: Ares(2026)8858290, 18 Sep 2026; recitals 3 and 9, Articles 1-2. Draft annex: India entries, printed pp. 7-12.

Earlier India schedule: Regulation (EU) 2022/520

European Commission: 18 September announcement

European Commission: waste-shipment rules