

WEEE-PIN Position Paper

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Executive Summary

Implementation of the WEEE-Directive has been very different in the member states. In most cases this has to do with incorrect transposition. At the same time, teething problems have occurred in many places where producers needed time to organise themselves. WEEE-PIN welcomes the revision process, but clearly advises not to step back. WEEE-PIN suggests that rules are not revised before they have been implemented correctly in many countries.

Therefore, for the revision of the WEEE Directive WEEE-PIN **recommends**:

1. clear financial responsibilities of producers, starting from the moment the consumer discards WEEE, as based on the ‘polluter pays principle’;
2. the determination of appliance-based recycling targets completed with material-based recycling targets;
3. the introduction of reuse targets together with developing standard quality criteria for reused WEEE;
4. persisting treatment standards;
5. measures to guarantee transparency and accessibility on the operations of producers’ compliance schemes – treatment channels, details on fund raising;
6. the integration of a definition of ‘producer responsibility’ into the Waste Framework Directive, as suggested by the European Parliament;
7. the confirmation of the important role of local and regional authorities in determining and organising collection systems for WEEE from households;
8. the inclusion of products which are generally used in households in the B2C collection schemes;
9. the introduction of collection targets based on quantities put on the market;
10. the creation of a centralised database for European Producers, regularly audited by an independent organisation.

WEEE-PIN members strongly favour that the basic principles of the WEEE-Directive, including individual producer responsibility, are strengthened and implemented by giving more precisions, not by deregulating. This could be ensured by integrating the meaning of producer responsibility in the Waste Framework Directive.

WEEE-PIN believes in the necessity of good, well-monitored targets. As the EEE markets are very different throughout Europe, a collection target, based on quantities put on the market, might be more appropriate. Appliance-based recycling targets are a drive to create good take-back systems, and should be complemented with material based recycling targets. These should include reuse of appliances on the European market.

There is a clear need for a different approach for B2B and B2C WEEE. Products coming from businesses, but which are generally also used by households, should be integrated in the B2C take-back-schemes as chances are that this waste will turn up most of the time in the public collection facilities.

Competition between compliance schemes does not create a huge benefit for the consumers. Good sideconditions are a lot more important than the discussion whether or not one or more compliance schemes are necessary, although dealing with one not for profit take-back-scheme



probably makes things easier for all actors (producers, local and regional authorities, ...). Markets are to be created within the systems, not between the systems.

Reuse contributes both to environmental and social goals. The WEEE-Directive proposes good principles to enhance reuse, but these have been lost in bad transposition. Clarification, and integration of reuse-targets, should recognise the importance of reuse.

Public authorities point out a lack of transparency in the functioning of various compliance schemes. Visibility on treatment channels and details on fund raising should be accessible for all stakeholders.

Organisational choices regarding the collection of WEEE from households should be left to the local authority in charge of municipal waste collection. The further management of the WEEE should preferably be organised in an open and transparent way, thus giving all authorised companies similar chances to obtain a share of the waste management market. Open and fair competition allows that the choice of operator is not only based on economic criteria but also on environmental and social conditions.

Treatment standards (annex II) remain necessary in the directive, as these have to be clear, environmentally sound and relevant.

The financial responsibilities of producers are to be implemented in a full and correct way, based on the polluter pays principle. Each producer must take on all the costs related to the optimum management of its product at the end of its life from the moment the consumer discards it. In any case, local and regional authorities should not have any obligation to hand over collected WEEE if their costs are not fully covered by the producers.

1. Producer Responsibility

Producer responsibility generally aims at 4 important goals:

1. **internalize collection and recycling/treatment costs:** this allows to **finance** the management of an easy accessible network of convenient facilities for the return of certain waste streams, where the waste can be delivered free of charge. This emphasizes the **public service** nature of producer responsibility, as it fits in a philosophy of high quality collection services for the population, making it a part of integrated waste management at the local level.
2. **develop recycling and recovery channels** for a given waste stream; the WEEE-Directive has so contributed to create one of the strongest recycling industries in the EU
3. as this cost is internalized in the product price, the consumer, and not the tax payer, bears all costs related to the waste he has produced, which is **socially** fairer;
4. the application of individual producer responsibility allows to internalize environmental costs, encouraging **ecodesign** and the production of products which are **easier** to **dismantle, reuse and recycle**.

This concept clearly follows the general polluter pays principle, meaning that each producer (person or company which puts a product on the market) or consumer through internalization must bear all the costs related to the environmentally sound management of that product at the end of its life, from the moment the consumer discards it.

Although these principles are clear, and were also the foundation of the WEEE-Directive, transposition has been very different throughout Europe. The fundamental problem is that the physical and financial responsibility for collection are separated and allocated in several combinations as it can be seen in the various legal transposition texts of the Member States. According to a study by Rossem et al. municipalities in at least nine countries still have the obligation to finance the collection of WEEE from households (Denmark, Germany, Ireland, Luxembourg, the Netherlands, Poland and Slovenia). They also discovered that in practice, municipalities were paying for most of the costs concerning WEEE-collection even in those cases where the producer is legally obliged to do that. This illustrates that a considerable part of the costs of managing WEEE are left to general taxpayers.¹ In our opinion, these practices are not compliant to the Directive. This disables the possibilities of internalization of environmental costs, as they are shifted from consumers and producers to taxpayers and local authorities.

Differences in implementation and incomplete application of the producer responsibility principles could have been avoided. Taking into account the real waste management costs of each product from the moment the consumer discards the product would have created more effective individual producer responsibility. Enforcement of article 8 of the WEEE-Directive could ensure that national transpositions do not move away from the principles, as it is the case today in for instance Germany.

To ensure better implementation of producer responsibility in the future, WEEE-PIN supports clarification of the meaning of producer responsibility in the Waste Framework Directive (WFD)

¹ Rossem, van Chris, Naoko Tojo and Thomas Lindhqvist (2006) Lost in Transposition? A study of implementing Individual Producer Responsibility in the WEEE-Directive. *IIIEE Other publications*, Lund University, Sweden, p. 19-20.

by the proposal of an article 3 a), similar to the one introduced by the European Parliament in the debates on the revision of the WFD.

New Article 3a (modified) Waste Framework Directive Producer responsibility

1. Member States and the Community shall, in order to reinforce producer responsibility, take measures to hold producers or importers responsible for the waste which is generated as a result of their product being placed on the market. This should be done, in any case,

- *by introducing take-back obligations for producers/importers with the transfer of the real and complete cost,*
- *by introducing the obligation to provide publicly available information as to the extent to which the product is reusable or recyclable,*
- *by requiring producers to use materials and product design which help to avoid or reduce the generation of waste and to render the waste generated less damaging,*
- *by ensuring the creation of facilities to make repair and re-use possible,*
- ***and** by ensuring the creation of facilities for separate collection, take-back, recycling, recovery or controlled safe final disposing of products at the end of their life.*

2. Member States shall report to the Commission on the implementation of paragraph 1. The Commission shall assess the appropriateness of introducing extended producer responsibility schemes for specific waste streams at EU level, based on the experiences of Member States.

2. Collection, reuse, recycling and recovery targets in the European WEEE regulation

2.1. Quantified targets: pros and cons

Quantified targets reflect the priorities of a policy and can allow:

- to make stakeholders feel responsible;
- to check whether or not a system is effective and
- sanction if the target is not met.

In the field of waste management at EU level, **SMART** (Specific, Measurable, Acceptable, Realistic and Time-lined) targets enable strategic, environmentally and economically sustainable investments to be made. For instance, the various targets of a regulation on WEEE help to create certainty regarding waste inputs, processing standards etc., so that recycling and treatment markets for WEEE can emerge. But in some cases, targets have proven to be counterproductive (for instance when take-back systems are happy to achieve the target, but without doing anything about the additional amounts of waste). Therefore, any target should then be **followed-up tightly and revised** to remain challenging.

Bad monitoring of results can create situations where figures are manipulated, distorted and over-interpreted - consequently generating confusion and inequalities. Uniform and independent monitoring is a necessity.

2.2. Collection targets

The **rate of 4 kg collection per capita per year** would only cover, according to various evaluations, 25% of the WEEE effectively generated every year². This target seems obviously defined as a rough guide until precise data on WEEE generated by households are gathered.³ This low threshold also has the purpose to create an easily accessible public service.

Today, countries like Norway already achieve a collection rate of more than 15 kg WEEE per inhabitant, while the latest Member States have hardly any collection of WEEE at all. But the average fridge in Norway weights about 60 kg against 29 kg in Slovakia⁴. Therefore, WEEE-PIN suggests that a collection target is expressed as a percentage of the quantities sold on the market.

It should be made clear that such a collection target is a **minimum collection rate** within a principle of producer responsibility entailing full **responsibility for all quantities of WEEE collected** within a member state.

2.3. Reuse and recovery targets

The fact that in the current directive the reuse of whole appliances is not taken into account to achieve the recovery targets at least up to 31st December 2008 does not create any driver for producers to favour the reuse of their products or better design for reuse. WEEE-PIN favours either the integration of appliances reused on the European market, in the figures of recycled products, or preferably the creation of specific targets for **EEE to be reused on the EU market**. This could incite take-back-schemes to organise the collection in such a way that reusable WEEE does not get damaged.

The setting up of recovery and recycling rates by categories of appliances and not by material is problematic as the environmental impact of each material is not equal. This has to be taken into account. The current targets should be complemented with material based recycling and recovery targets.

WEEE-PIN is of the opinion that any recycling and recovery rate is as good or as bad as the **monitoring and control mechanisms** in place are to ensure compliance with these targets. In WEEE-PIN's view strict and above all uniform, EU-wide monitoring specifications are required if market distortion and manipulation in presenting recovery and recycling rate data are to be avoided.

With that view, WEEE-PIN strongly recommends the creation of:

- a centralised database for European Producers
- regularly audited by an independent service.

The directive should impose Member States to provide **sanctions** for the non achievement of targets by producer's compliance schemes.

² Explanatory Memorandum WEEE and ROHS Directives, COM (2000) 347 Final, Brussels, 13 June 2000, p.23.

³ It corresponds to an average collection rate achieved by several countries of the European Union in the setting up of collection pilot programs, and to the results achieved when implementing the Dutch legislation. Collection targets for waste from electrical and electronic products, Germany 1998, European Commission DG XI, p. 13.

⁴ Source : RAL

3. B2B & B2C Equipment

Take-back-schemes and related markets for WEEE differ greatly according to B2B (business to business) or B2C (business to consumer) equipment. Each of them requires thus an appropriate approach.

B2C markets are characterised by:

- Big quantities of standardized products;
- In most cases: the absence of any contractual relation between the final user (citizen-consumer) and a waste-collector;
- The existence of a grey zone: B2C products are often used also by enterprises;
- The setting-up of take-back-schemes by producers, financed by a (internalized) fee paid by the consumer at the moment of purchase of the product.

B2B markets are characterized by:

- Limited quantities of specific products;
- In many cases: take-back of old material at the moment of delivery of new appliances;
- The organisation of second-hand markets by the sellers of EEE.

Waste collection channels for B2C equipment is characterized by:

- The need for citizens to be able to discard their WEEE in a simple and efficient collection system, like for instance:
 - o Municipal collection points
 - o Authorised social economy enterprises
 - o Distributors (1:1 at the purchase of a new similar product)
- A Service accessible to everybody, wherever they live in a given country, based on the local needs.
- Uniform communication messages for all citizens.

Waste collection & management channels for B2B is characterized by:

- The existence of different types of fees according to the market sectors
 - o A minimum fee for administrative aspects – costs being invoiced at the end on the basis of true management costs
 - o A fee including all the management costs
- The existence of a contractual relationship between the producer of WEEE and the collector, which requires to leave to the market the possibility to organise themselves in a spirit of free competition or to leave to each producer the choice of his operator
- The market being completely heterogeneous, possibilities for WEEE management and the reimbursement of potential expenses must be done case by case. It seems thus more appropriate to leave to each producer the choice of his operator (collection + treatment)
- The traceability of appliances needs a specific producer compliance scheme. Such a system should involve the following characteristics:
 - o it should not require any minimal threshold for collecting WEEE
 - o it should keep the logic of paying for getting rid from ones waste (which makes the system more healthy than switching for gratuity)
 - o avoiding abuses and non-conform WEEE
 - o limiting the amount of taxes

This quite clear and simple scheme has to be nuanced for the grey-zone-products, like PC, neonlight, etc.: **WEEE coming from businesses indeed, but from products which are generally also used by households, should be integrated in the B2C take-back-schemes** as chances are that it will turn up most of the time in the public collection points.

WEEE-PIN favours the conservation of a different approach for B2B WEEE as compared to B2C WEEE, with integration of the grey-zone-products in the B2C schemes. The classification between both should in any case not be left to producers but done by an independent authority in each Member State.

4. One or several producers' compliance schemes within one country?

Member States have chosen very different approaches: from one collective system, over clearing houses to competition between large numbers of take-back-schemes. The success factors for sound WEEE management **do not seem to lie** in the existence of one or several schemes but rather in the legislative framework ensuring clear rules for the financing and the transparency of the systems.

WEEE-PIN identified some of these key-factors:

- producers compliance schemes with a **not-for-profit** character
- producer responsibility on an **individual** basis, internalizing effective costs based on the composition and recyclability of each product, even in collective collection schemes
- the **same quality and accessibility of collection service** nationwide, with a homogeneous, coherent system in terms of image and communication, organised at the local and/or regional level
- clear rules on the **allocation** of collected quantities according to market shares and notably the maintaining of certain coherence between the incomes from the members of the system and the quantities of WEEE collected and treated
- a **strict control upstream** (transparency, amount and use of fees, clear rules allowing to compensate all local authorities the same cost-covering way...) and **downstream the system** (benchmarking quality and costs of collection, transport and treatment, traceability of waste management channels, public audit and control of the figures and costs declared by the schemes),
- preservation of a **free competition organised within the systems** when markets or lots for collection and treatment are allocated (if sufficient critical mass, of course). The size of these lots can be based on geographical realities.
- **ambitious take-back targets, adapted to each flow.** This helps to avoid that some schemes focus on "easy" products (white goods for instance) to the detriment of more complicated ones (PC, mobile phones etc.).
- **full responsibility for all collected WEEE**, regardless whether or not collection targets have already been met. This will avoid intentionally under-achievement of collection schemes.

Therefore, WEEE-PIN is of the opinion that good side conditions are a lot more important than the discussion whether or not one or more compliance schemes are necessary, although dealing with one not for profit take-back-scheme probably makes things easier for all actors (producers, local and regional authorities, ...).

5. Reuse of WEEE

5.1. Why is reuse of WEEE important?

Reuse of waste is the second preferred waste management stage after prevention at source. The reuse and repair of end-of-life products help to reduce the increasingly growing waste amounts. By extending the product life span, reuse enhances resource efficiency and saves energy, and thus reduces water and air pollution. This also applies for waste electr(on)ical appliances. Even if energy-efficiency of EEE is important, in most cases the overall ecological impact of an EEE can be reduced by using or reusing the appliance as long as possible. Some recent studies conclude that repairing even 20-year old washing machines⁵ is more favourable to the environment than producing new ones.

Repair and reuse of WEEE is already well developed in the EU and economically viable as the demand from consumers for second-hand EEE is bigger than the supply. Members of the RREUSE network⁶ collect about 150.000 tons WEEE every year in 10 Member States. If collection of reusable items would be performed at the earliest stage possible this amount would still increase.

The, mainly non-profit, organizations dealing with reuse not only contribute to the waste management for ecological reasons but have an important (local) social role by offering job opportunities to disadvantaged people on the first labor market and by offering vital items for people with low incomes. The social aspects of reuse should not be lost in an environmental legislation.

WEEE-PIN is aware of the fact that in some cases, reuse is used as an excuse for illegal export of WEEE outside Europe and outside OECD-countries. WEEE-PIN therefore favours a regulation in the WEEE-Directive and/or in the Basel convention to ensure that reuse of appliances, discarded in Europe, is restricted to EU-Member States and OECD-countries.

5.2. Is reuse sufficiently recognized by the actual WEEE-Directive?

The WEEE-Directive states that:

- Member States are required to encourage the conception and manufacturing of EEE that facilitates (...) in particular their reuse (...), either of the whole appliance, their components or materials. Producers cannot prevent products to be reused by a conception or particular manufacturing processes, except if they present decisive advantages, regarding environment or security and hygiene (art. 4).
- Member States shall give priority to the reuse of whole appliances on other treatment options (art.7.1).
- Collection and transport shall be carried out in a way which optimizes reuse and recycling of those components or whole appliances capable of being reused or recycled (art. 5.4).
- The WEEE-Directive also requires, in order to facilitate reuse, that producers provide reuse and treatment information for each type of EEE put onto the market (art. 11.1)

However, **these good principles are all too often lost:**

- in take-back systems which concentrate on low-cost recycling in centralized plants, thus endangering the existing local or regional reuse systems
- Producers also rarely design EEE taking into consideration reuse of products or components (few exceptions, e.g. photocopiers).

⁵ Roland Steiner & al. (2006) « Timely replacement of white goods. Investigation of modern appliances in LCA »; Nina Trutmann & Helmut Rochberger (2006) « Contribution to resource conservation by reuse of Electric and Electronic Household appliances »

⁶ RREUSE is a European network of social economy enterprises. For more information, see www.rreuse.org.

- The viability of repair and reuse centres depends on the availability of information about components, materials and ways to repair the different types of products on the market. However, in practice (networks of) reuse centres have often difficulties in asking such information (for instance they must often pay for it).
- Producers have an economic interest not to reuse or repair discarded appliances, since they would rather sell new appliances.

With other words, the main problems are to be found in the way the WEEE-Directive has been implemented in the national regulations.

According to WEEE-PIN, the revision should address the following issues in relation with reuse:

- Clarify the existing framework by creating clear targets and incentives for reuse, including specific targets of the reuse of whole appliances or components on the EU market;
- Compel to the selection of reusable WEEE in all collection sites at the earliest stage. This could be done by revision experts if covered by the financial responsibility of producers;
- Make reuse activities visible in monitoring and reporting systems covering the entire collected, treated, recovered and exported WEEE stream; this would allow to introduce specific targets in a later phase;
- Recognize the social aspects of repair and reuse and support the development of projects investigating and promoting these aspects;
- Establish quality criteria for reuse and ad-hoc authorisation for reuse centres;
- Oblige producers to provide for free all necessary information for all available products on the market to authorized repair and reuse centres with the view to facilitate the maintenance, reuse, upgrade and refurbishment of WEEE;
- Describe treatment standards to clarify when and how substances or components should be removed to make sure that the most environmentally friendly dismantling, removal of hazardous substances and highest component reuse is made possible;
- With the view to tackle illegal waste exports for reuse: establish easy and clear criteria and ensure their enforcement.

6. Transparency of producers' compliance schemes

Generally, public authorities point out a clear lack of transparency in the functioning of the various producers' compliance schemes for WEEE in Europe, mainly regarding:

- visibility of treatment channels (non-communication of treatment facilities);
- assessment of the reuse, recycling and recovery rates (consequence of this lack of visibility);
- the calculation of the fees on appliances, of the producer's individual contributions, and of the constitution of reserves.

Furthermore, it appears that although the reserves that have been built up by several producer compliance schemes are funded with public money, there is no public control over these reserves, which allows these funds to grow endlessly.

WEEE-PIN believes that the following requirements should be met as a minimum:

- A visibility on the way reserves are constituted (calculation method, management of funds, assessment of the correct amount of funds considering the needs and objectives of the system, the end of funds if the producer compliance scheme disappears, etc. ...)
- A visibility of the calculation methods for fees (true collection and treatment costs, true incomes from the recovery of materials, etc.)
- Transparency of take-back rates calculation methods
- Visibility of the entire management channels including outside the EU
- Easy and accessible information for consumers, users, reuse and treatment centres.

The notion of public service could be emphasized by including representatives from local and regional authorities and from consumer organizations on the boards of the producers' compliance schemes, as observers. Furthermore, the WEEE-Directive should have provisions on the maximum size of reserves that are being created by producer compliance schemes, and on which activities the (visible) fees as well as these reserves can be spent. A form of public control is needed in order to ensure that the money yielded by the consumer is used in a proper way.

7. Market requirements

All European waste management companies should have access to collection and recycling systems, set up by the take-back-schemes. At the same time, integrating WEEE collection within the larger local waste management systems appears a necessity for ensuring a convenient and coherent service to the population.

WEEE-PIN believes that both goals can be met. The collection of WEEE from households should be left to the choice of the local authority in charge of municipal waste collection. Further management of the WEEE should preferably be organised through open and transparent procedures, comparable to tendering by local or regional authorities using public procurement procedures, thus giving all authorised companies similar chances to obtain a share of the waste management market. Open and fair competition allows that the choice of operator is not only based on economic criteria but also on environmental and social conditions which could be included in calls for tenders. Take-back-schemes should never be allowed to own a collection or recycling company as this would be a distortion of the market (in Austria, a take-back-scheme is planning the construction of an important treatment facility, closing the Austrian market for years to come).

Such an organisation, in combination with the good use of targets and strict control on export of WEEE can help to create certainty regarding waste inputs, processing standards etc. ... so that recycling and treatment markets for WEEE can emerge.

8. Treatment standards

The WEEE-Directive and its implementation in the national laws and regulations of the EU Member States are regarded primarily as being a part of environmental legislation. With respect to the treatment and recycling of WEEE, environmental targets can only be met if appropriate

treatment standards and specifications are incorporated into the directive and the statutory instruments put in place by the Member States.

Article 6(1) of the WEEE-Directive stipulates the minimum requirement to remove all fluids and to perform selective treatment in accordance with annex II. While the expression *'have to be removed'* in annex II certainly needs to be defined, WEEE-PIN is of the opinion that there must be no fundamental changes to the provisions of the annex. The requirement in annex II (1) to remove substances, preparations and components contained in waste equipment are clear, environmentally sound and practically relevant and, as such, should definitely be retained. Especially the requirement of manual dismantling, even involving extra-costs, must be maintained not only for keeping reuse competitive in comparison of recycling, but also for optimising the environmental impacts of the management of hazardous waste, which might be much more difficult to manage and control in the case of large-scale mechanical shredding. Furthermore, setting treatment requirements is a method to internalise the environmental costs in the product's price. The implications of having to meet treatment and recycling requirements will send a signal to producers to develop product designs that would in turn address these issues not only from a cost perspective on the production side, but in a total life cycle perspective including end-of-life.⁷ Ecodesign remains one of the main goals why producer responsibility was introduced in the WEEE-Directive.

Should technical specifications need adaptation to market evolutions, WEEE-PIN believes that Comitology might be used as an additional instrument. Some examples:

- Liquid crystal displays
Due to its increasing share of the market and the substantial rise in volumes produced, LCD waste will become increasingly significant in future and should be subject to greater scrutiny.
- Gas discharge lamps
The significant trend towards using energy saving lamps means that the relevant waste treatment technologies must be revised and adapted. Only rod-shaped lamps are being treated at the present time.
- Refrigeration equipment
The publication of the life-cycle assessment study by the experts at the Öko-Institut e.V. should have put paid to the proposal made in some quarters to simply eradicate the existing requirement to remove and then dispose of or recover not only CFCs, HCFCs and HFCs but also hydrocarbons from waste refrigeration appliances. Processing waste fridges and freezers in an autoshrredder must be prohibited. The phrase *'equipment containing gases'* in annex II (2) should, however, be removed, as the fundamental requirement regarding CFCs, HCFCs and HFCs is already included in annex II (1).

WEEE-PIN suggests that the final section of article 6(1) should be altered to read:

'For the purposes of environmental protection, high quality standards for the treatment of collected WEEE should be set up at the EU level, based on the principles of the current Annex II.'

Justification: The current discretionary provisions (*'may set up minimum quality standards'*) was implemented in hardly any of the EU Member States. (One excellent example of best-practice is Austria and its Waste-Treatment Obligation Ordinance (*Abfallbehandlungspflichten-Verordnung*)).

⁷ Rossem, van Chris, Naoko Tojo and Thomas Lindhqvist (2006) Lost in Transposition? A study of implementing Individual Producer Responsibility in the WEEE-Directive. *IIIEE Other Publications*, Lund University, Sweden, p. 25-26

Well-accepted standards involving all market stakeholders in their elaboration and regulating the treatment of the various types of WEEE are urgently required at EU level for the treatment of WEEE from categories 1, 3, 4 and 5.

9. Financial aspects

To ensure the producers' take-back duty, distributors' reverse logistics have not proven to be successful. On the contrary, it were the existing municipal collection facilities that have demonstrated their efficiency. That is why most producers' compliance schemes base their systems on municipal collection facilities. But even if obliged to cooperate with municipalities, producers have continually refused to pay the collection costs born by municipalities, ignoring the principles of art. 8 and 9 of the WEEE-Directive. Moreover, producers try to control the markets by limiting the choices of organising collection in practice. This has led to great discontent not only about financing, but also about the quality of the service to citizens and collection's performance criteria. On the other hand, WEEE-PIN understands that producers want predictability and certainty about collection costs. There is a risk that local authorities would work in an inefficient way, because of the certainty that take-back-schemes would have to cover their expenses anyway.

In order to avoid this, guarantees should be integrated in the system, generating a correct balance between producer's financial responsibility and local operational responsibility. This can e.g. be done by setting up a system of forfeit compensations (lump sums) based on an objective and realistic cost calculation. In any case, Local and Regional Authorities should not have any obligation to hand over collected WEEE if their costs are not fully covered by the producers.

As a conclusion and reminder of the statement we made on producer responsibility (p. 2):

We are in favour of a concept based on the polluter pays principle, that is to say, that each producer must take on all the costs related to the optimum management of its product at the end of its life. This optimum management would, of course, be defined in a way that favours waste reduction at source. In this way, we get closer to integrating environmental costs into the price of products and it becomes possible to create an incentive for eco-design.