



DIGITALEUROPE



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## Waste Package:

### European EEE industries, compliance schemes and recyclers call for consistency in the calculation of recycling rates

CECED, DIGITALEUROPE, EERA and the WEEE Forum are concerned with the proposed new rules on the calculation of the attainment of the recycling targets laid down in Article 11a of the European Commission Proposal amending the Waste Framework Directive (WFD). We are united in calling for consistency in the method proposed for calculating recycling rates, to ensure reliable and comparable data at EU level.

#### WHY IS THE COMMISSION PROPOSAL ON THE CALCULATION METHOD FOR RECYCLING RATES NOT SUITABLE TO ENSURE THE TRANSITION TOWARDS A CIRCULAR ECONOMY?

The European Commission proposal on the calculation method for recycling rates will not support the transition towards a circular economy, because **it fails to provide an accurate method to calculate the recycling rates**, and therefore **fails to encourage the development of high quality materials recycling**, in accordance with EN 50625 treatment standards in our sector.

The “*weight of the input waste entering the final recycling process*” should not be considered equivalent to the “*weight of municipal waste recycled*”, as laid down in the proposal Article 11a.1. This assumption disregards the impurities and assumes the ability of the process to sort and recycle all the fractions that enter the facility as 100%.

For example, if a fraction composed of 80% of recyclable plastics and 20% of impurities enters a plastics recycling process with a 95% yield, then according to the new methodology laid down in the WFD, this fraction could be considered 100% recycled. However, in practice, this fraction would only be recycled up to 76%, i.e. 80% multiplied by 95% (purity of the fraction multiplied by recycling performance).

In addition, the newly proposed Article 11a.3 WFD includes a derogation allowing to report the “*weight of the output of any sorting operation*” as “*the weight of the municipal waste recycled*” under two conditions. This could lead to a distortion of the reporting, as the rate declared by the Member States could be 10% (or more) different than the recycling rates achieved.

#### WHAT ARE THE WEEE II DIRECTIVE AND STANDARDS SAYING?

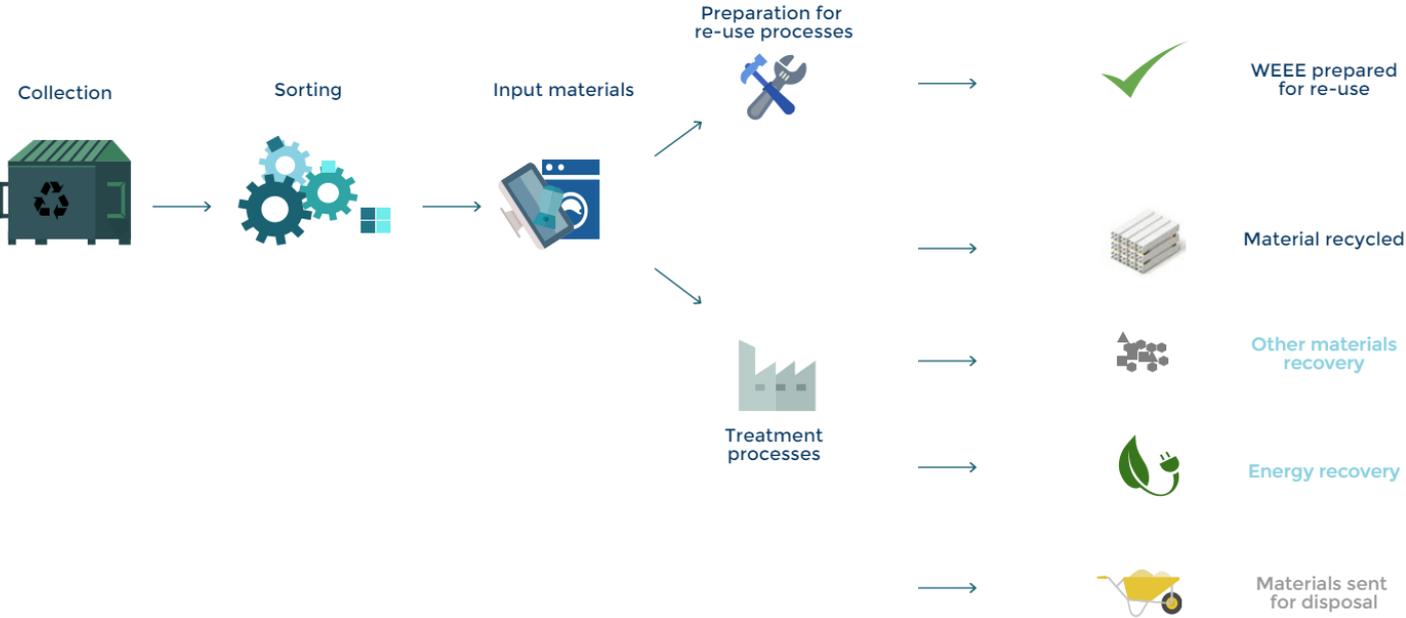
In line with article 11.2 of the WEEE Directive<sup>1</sup> and the definitions of the Waste Framework Directive 2008/98/EC, CENELEC, an EU Standardisation body, has developed the EN 50625-1 standard, including method for the calculation of the achievements of the targets at treatment facilities. This standard has

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<sup>1</sup> “The achievement of the targets shall be calculated, for each category, by dividing the weight of the WEEE that enters the recovery or recycling/preparing for re-use facility, after proper treatment in accordance with Article 8(2) with regard to recovery or recycling, by the weight of all separately collected WEEE for each category, expressed as a percentage. Preliminary activities including sorting and storage prior to recovery shall not count towards the achievement of these targets.”

been collaboratively developed by experts from producers’ side, recyclers’ side, compliance schemes, NGOs and consumer organisations. In a recent study for the European Commission<sup>2</sup>, a consortium of consultants has also underlined that “the most promising approach to benefit from advantages of output-based targets while taking into consideration the current reporting structures and data availability is to tackle non-harmonised reporting structures where different interpretation and practices are used [...]” and that “the focus shall rely on referencing, fostering and enforcing the recently developed CENELEC standards (starting with EN 50625-1) as referred to in Article 8(5) of the new WEEE Directive”.

**According to EN 50625-1** Collection, logistics & Treatment requirements for WEEE - Part 1: General treatment requirements, the process undergone by WEEE from collection to recycling or preparation for reuse is the following:



Consequently, the calculation of recycling and recovery rates is as follows:

- **For recycling rates:** only the fractions recycled (output of material recycling) and the WEEE prepared for reuse are accounted in the achievements of the recycling targets
- **For recovery rates:** the material sent for recycling, other materials recovery (e.g. backfilling) and for energy recovery are accounted in the recovery targets.

**WHY IS THIS THE APPROPRIATE CALCULATION METHOD FOR THE WEEE STREAMS?**

WEEE is a mixed stream composed of hundreds of different products that have reached their end-of-life, which should always be separately collected, and not be mixed with other waste or other materials with different properties.

With the methodology set in the EN standards to calculate recycling rates, **WEEE ending up in landfill, incinerated or illegally exported, material disposed of after treatment are not accounted into the recycling targets.** The recycling rates reported to the authorities reflect the rates that have been appropriately and effectively recycled/recovered, without any derogation possible.

<sup>2</sup> [Study on WEEE recovery targets, preparation for re-use targets and on the method for calculation of the recovery targets](#) (2015)

## OUR RECOMMENDATIONS:

CECED, DIGITALEUROPE, EERA and the WEEE Forum support the European Commission ambitions to ensure high quality material recycling and to harmonise the methods to measure recycling rates, ensuring comparable, reliable and timely data at EU level. Recycling and recovery rates, declared by Member States, are key indicators for monitoring implementation and achievements of waste legislation.

Due to the complexity of the WEEE streams and inherent differences between WEEE and other waste streams, **producers of electrical and electronic equipment, WEEE producer compliance schemes and recyclers recommend the use of the calculation method for WEEE laid down in EN 50625-1 standard pursuant to article 8.5 and complementing article 11.2 of the WEEE Directive.** In order to help to clarify and provide legal certainty to our sector, **the Waste Framework Directive should explicitly mention that the calculation methods set in accordance with the specific waste stream legislations prevail, i.e. rules set in Article 11a would only apply where specific waste stream legislation does not provide for a waste stream specific calculation method.**

However, if the calculation method set in Article 11a would also be considered as applicable to WEEE, **we then recommend that rules laid down in the newly proposed article 11a should be aligned with the WEEE Directive, consequently with the calculation method of recycling rates as given in the CENELEC EN 50625-1 standard.** The EN 50625 standards, in the final stages of completion in CENELEC, could create a level playing field<sup>3</sup>, uniform protection of the environment across Europe and uniform application of the method for calculating recycling and recovery rates for all the actors handling WEEE on the markets. Adherence to the normative requirements in the EN 50625 standards provides assurance that WEEE is collected, transported and treated in compliance with the Directive. We believe that harmonised high quality material recycling and measurement of the recycling rates for WEEE are decisive tools to develop the market for secondary raw materials, key to the transition towards a circular economy in the European Union.

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<sup>3</sup> [CECED, DIGITALEUROPE, EERA, WEEE Forum Position Paper on Compliance with EN 50625](#)

**CECED** represents the home appliance industry in Europe. The total annual turnover of the industry in Europe is €50bn. Total employment as a result of the presence of the sector is approximately 1 million jobs. The sector contributes €1.4bn to research and development activities in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Indesit Company, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. CECED's member Associations cover the following countries: Austria, Baltic countries, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom.

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**DIGITALEUROPE** represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 62 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: [www.digitaleurope.org](http://www.digitaleurope.org)

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**EERA**, the European Electronics Recyclers Association, is a non-profit organization that represents the interest of the 36 major recycling companies who are treating waste electrical and electronic equipment WEEE in Europe. The EERA members recycle ± 2.500.000 tonnes of WEEE annually and have more than 100 locations in 22 European countries. EERA aims for the harmonization of international and national regulations for WEEE recycling, in order to obtain a free market (level playing field) for demand and supply of services. The members are located in the following countries: Austria, Belgium, Bulgaria, Czech Republic, Denmark, Italy, Finland, France, Germany, Greece, Ireland, Poland, Portugal, Romania, The Netherlands, Norway, Slovakia, Spain, Sweden, Switzerland and the United Kingdom. Member companies are: Alba, Aurubis, A.Jansen, Boliden, ClozdLoop, Coolrec, Ekan, Elektrocyling, Elemental Holding, Enviropol, Fundosa Reciclaia, Galloo, Glencore, Green WEEE, HKS Metals, Immark, Indumetal, Jacomij, KMK Metals, Kuusakoski, Müller Guttenbrunn, Noex, Relight, Remondis, Sims, Stena, TXO, Umicore, Veolia, WKR.

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The **WEEE Forum** is a European not-for-profit association speaking for 32 electrical and electronic equipment waste (WEEE) producer compliance schemes – alternatively referred to as 'producer responsibility organisations' (PRO). It was set up in 2002. The 32 PROs are based in Austria, Belgium, Czech Republic, Denmark, Estonia, Italy, Greece, France, Ireland, Lithuania, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland and the United Kingdom. It is the biggest organisation of its kind in the world. In 2015 its member organisations reported collection and proper de-pollution and recycling of more than 1.7 million tonnes of WEEE. Members in 2016: Amb3E, Appliances Recycling, Asekol SK, EÅF, Ecodom, Eco-systèmes, Ecotic, Eco Tic, EES-Ringlus, EGIO, ElektroEko, Elektrowin, El-Kretsen, elretur, el retur, Environ, Fotokiklosi, Recupel, ReMedia, Renas, Repic, Retela, RoRec, SENS, SWICO, UFH, Wecycle, WEEE Ireland, WEEE Malta and Zeos.

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