



Accelerate the transition to a circular economy, enhance collection of end-of-life products, strengthen the market for secondary raw materials

WEEE Forum response to the consultation on the Circular Economy Act

Brussels, 4 November 2025

Next year, the European Commission will publish its Proposal for a Circular Economy Act. The Act is expected to accelerate the transition to a more circular economy and increase the EU's economic security, resilience, competitiveness and decarbonisation. It will establish a single market for secondary raw materials, increase the supply of high-quality recyclates and stimulate demand for recyclates.

The [WEEE Forum](#)<sup>1</sup> welcome this ambition and are supportive of initiatives that create a fully integrated, efficient, fair and resilient circular economy, securing the supply of Critical Raw Materials (CRM), stimulating investment, and supporting long-term environmental, economic, and strategic benchmarks.

A true circular economy calls for a robust legal framework centered on inclusive responsibility, clear regulations, coordinated enforcement, and broad societal engagement.

Why a Circular Economy Act now? On the one hand, prices for secondary raw materials remain higher than for primary ones, and quality often trails behind. Regulations and waste classifications differ among Member States, impeding cross-border flows and creating business uncertainty. On the other hand, key actors in the value chain fail to collaborate efficiently. Low consumer awareness of products made from secondary raw materials hinder market growth. Public procurement fails to sufficiently incentivise the use of secondary materials.

Among the many actions that we must collectively undertake, the WEEE Forum recommend the following:

- Reshape EPR to include all actors with access to WEEE, create co-ordination bodies and make the WEEE management benchmarks and targets more meaningful and robust.
- Mandate European standards (EN 50625, EN 50614) as official reference.
- Ban cash transactions for metal dealers.
- Harmonise regulations that remove obstacles to transboundary shipments of waste.
- Increase targeted financial mechanisms (grants, subsidies, tax relief) for distinct circularity initiatives.
- Launch EU-wide and national awareness campaigns, co-ordinated centrally, to build public understanding and responsibility.
- Strengthen enforcement (inspection, prosecution and sentencing) to combat illegal and irresponsible WEEE operations and provide capacity-building for competent authorities.
- Require distributors and online platforms to offer free WEEE take-back.
- Mandate compositional analyses of mixed waste streams with a harmonised methodology to better ascertain WEEE flows.
- Rethink the EU's industrial policy, co-ordinating CRM recovery policies and programmes, and provide support to continued research.
- Foster public procurement policies that promote the goods and services with the lowest negative environmental impact.

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<sup>1</sup> The world's largest family of producer responsibility organisations (PROs) that responsibly manage the take-back of electrical and electronic waste. Together with our members, we are at the forefront of turning the Extended Producer Responsibility principle into an effective electronic waste management policy approach through our combined knowledge of the technical, business and operational aspects of collection, logistics, de-pollution, processing, preparing for reuse and reporting of e-waste. Our ambition is to be the world's foremost e-waste competence centre excelling in the implementation of the circularity principle. All fifty PROs are not-for-profit and collectively they are mandated by 46,000 producers of electrical and electronic products. With members on all continents, the WEEE Forum is a for-impact e-waste knowledge centre. Last year, the PROs in the WEEE Forum collected 3,100,000 tonnes of end-of-use electronics, the equivalent to 310 Eiffel Towers. Over the past twenty-three years, they collectively managed in excess of thirty million tonnes of electrical and electronic waste.

Question	Section	WEEE Forum comments
		Rating
Question 1: To what extent do you agree with the following statements about barriers hampering the EU single market for secondary raw materials?		
Question 1	a. Prices for secondary raw materials are generally higher than prices of primary raw materials	2 Prices for secondary raw materials are generally higher than prices of primary raw materials.
Question 1	b. The quality of secondary raw materials is generally lower than the quality of primary raw materials	3 The quality of secondary raw materials is generally lower than the quality of primary raw materials.
Question 1	c. A lack of standardised certification for secondary raw materials affects their marketability	2 Yes, a lack of EU quality standards for secondary raw materials (recyclates) affects their marketability. European Standards (EN 50625 series and EN 50614) must be mandated as the official reference for WEEE treatment. In view of improving the quality of recyclates, the WEEE Forum will support initiatives that bring together actors in the value chain, <i>inter alia</i> recyclers, compounders, PROs and manufacturers, to jointly define technical specifications for recyclates. The plastics value chain could be good start.
Question 1	d. There are too many regulatory obstacles to a well-functioning single market for secondary raw materials	1 Member States have varying regulations and classifications of secondary raw materials and of waste, which impact cross-border shipments and processing. There is a strong body evidence that shows that the procedures associated with transboundary shipments of waste are outdated, contradictory, complex, burdensome and excessively costly. Member States' divergent interpretation and application of end-of-waste criteria hinder the circulation of secondary raw materials. Significant differences in WEEE treatment infrastructure result in unequal access to secondary raw material markets. Uncertainties in relation to interpretation of legislation, waste classification and enforcement give rise to risks for businesses engaging in the waste and secondary raw materials market. Failure to enforce legislation allows non-compliant businesses to undermine lawful businesses.
Question 1	e. There are too many other barriers (financial, information, etc.) obstructing economies	1 As Mario Draghi, former Prime Minister of Italy, has observed: the single market is too fragmented. A

	of scale for the supply and demand of secondary raw materials		fragmented single market slows down the development of economies of scale for secondary raw materials.
Question 1	f. There is insufficient supply of secondary raw materials	3	Other factors, such as stable supply, inadequate quality or purity of recyclates, or <i>uncertainty</i> about the quality of recyclates, play a role in addition to (uncertainty about) the quantity of supply of recyclates of a certain quality. Uncertainty deters their involvement in secondary raw materials markets.
Question 1	g. There is insufficient demand for secondary raw materials	4	
Question 1	h. EU-made secondary raw materials face competition from imported secondary raw materials that are cheaper, of lower quality and/or of uncertain origin	1	EU-made secondary raw materials face competition from imported primary and secondary raw materials that are usually cheaper, of lower quality and/or of uncertain origin.
Question 1	i. There is not enough high-quality, sorted waste in the EU to produce secondary raw materials	1	Absolutely. The supply of high-quality, sorted waste does not allow for sufficient quantities of secondary raw materials.
Question 1	j. There is inadequate infrastructure for the collection, sorting, and transportation of secondary raw materials within the EU	2	For WEEE, major progress has been made in the past twenty years in improving the infrastructure for the collection, sorting, and transportation of secondary raw materials. The crux of the problem is, however, that roughly half of the WEEE stream bypasses formal collection routes, remain unreported or hibernate in households or business, and therefore are unaccounted for and escape the official scheme.
Question 1	k. Circular economy business models are not receiving the necessary financial support	1	Targeted financial mechanisms, including subsidies, tax relief, and other support schemes, will give rise to a reduction of the cost gap and enable sustainable options to become economically competitive. Tax reductions or state support for producers adhering to compliance will ensure that sustainable supply models can thrive. These should work in tandem with awareness initiatives emphasizing durability, reparability, and upgradability.
Question 1	l. Current public procurement practices do not sufficiently prioritise or incentivise the use of secondary raw materials	2	Public procurement practices are currently not a lever for the improved use of secondary raw materials. Initiatives to promote sustainable and circular practices in public procurement would be welcome, in particular in the purchase and disposal of electricals. See good practices in France.-
Question 1	m. Key actors in the products' value chains	2	The WEEE Forum is supportive of initiatives that foster co-operation between actors in the WEEE value chain, for

		(e.g. producers and recyclers) are not sufficiently working together to improve circularity		example among producers, compounders and recyclers to improve the recyclates market, or with distributors. Circularity calls for strong collaboration along the value chain as well as for clear responsibilities.
Question 1	n. Consumer awareness and acceptance of products made from secondary raw materials is low	2		Consumers' awareness of products made from secondary raw materials is low, yet steadily growing. The EU must invest more in research around consumer habits and measures that effectively make people buy sustainable products or products made from secondary raw materials. Research shows that awareness is not invariably conducive to change in attitude or habits. Circularity is a societal challenge; it requires the involvement of everybody in society.
Question 1	o. [new] There are insufficient measures to reshore industries involved in strategic and critical raw materials and components, which are required to generate demand for secondary raw materials and harness them to strengthen the EU's competitive advantage.	1		

## Question 2: How important are the following economic incentives in boosting the EU circular economy?

Question 2	a. Extended Producer Responsibility schemes (e.g. producers are held financially responsible for the entire lifecycle of their products, including their waste management)	2	EPR schemes are a major lever of circularity, a key tool in the circular economy toolbox. Producers must be held responsible for the entire lifecycle of their products. However, EPR stands for <i>Extended</i> Producer Responsibility, not Exclusive Producer Responsibility. EPR must be rethought, redesigned to account for many other actors that have access to WEEE (roughly 50%) or that govern the WEEE space: all actors that have access to WEEE must be obligated to collect WEEE separately, report and treat the WEEE in conformity with the regulations and standards, or, alternatively, and provided it is properly enforced, hand the WEEE over to entities that treat WEEE in conformity with regulations and standards. All actors in the WEEE ecosystem must be made accountable and be involved in the EPR scheme (#allactors principle).
Question 2	b. Deposit refund schemes	4	Deposit refund schemes are ineffective for products with a long lifecycle. See results of the <a href="#">2025 LIFE ECOSWEEE project</a> , which the WEEE Forum co-ordinated.
Question 2	c. Public procurement criteria supporting the circular economy	2	Public procurement practices must become a major lever for the uptake of secondary raw materials.

Question 2	d. Taxes or fees on incinerating and/or landfilling of waste	2	
Question 2	e. Taxes on exports of waste	2	
Question 2	f. Tax breaks and other fiscal incentives supporting circular economy practices	1	Fiscal incentives are critical in fostering circular economy practices, <i>inter alia</i> investment support for collection and processing infrastructure, grant funding for research and innovation around material recovery technologies, e.g. CRM recovery from WEEE to make it economically viable.
Question 2	g. EU funding for circular economy practices	2	In the past ten years, the WEEE Forum have been involved in multiple EU grant-funded projects that seek to stimulate circularity through the design of circular business models, new technologies, collection practices and other measures (see findings of <a href="#">C-Servees</a> , <a href="#">COLLECTORS</a> , <a href="#">ECOSWEEE</a> ). Grant funding aimed at projects that support the implementation of mandatory, legally binding standards, compile intelligence on the composition and destination of WEEE collected and the implementation of a Digital Product Passport would be extremely useful.
Question 2	h. National funding for circular economy practices	2	The repair fund in Austria is a good example.
Question 2	i. Reduction of subsidies which prevent circularity (e.g. subsidies for landfills and incineration)	2	
Question 2	j. Pay-as-you-throw schemes	2	
Question 2	k. Product-as-a-service models	2	The WEEE Forum are supportive of the design, development and roll-out of circular business models

Question 3: To what extent do you agree that the EU can take the following measures to help raise awareness and encourage a change of mindset among the broader public and economic operators towards a more circular economy?

Question 3	a. Set up EU-wide public awareness campaigns	2	Awareness is the first key step in increasing the volumes of WEEE collected. The WEEE Forum hosts and co-ordinates #ewasteday every year on 14 October. It is a worldwide moment for millions of people to reflect on their purchasing habits and on the importance of making sustainable choices (potential reach of the #ewasteday news release in 2025 was 1.6bn).
Question 3	b. Set up national or local public awareness campaigns	1	Strongly Agree. The WEEE Forum support the set-up of regular country-wide campaigns through a co-ordination body that channels resources and efforts of all actors and targeted campaigns based on citizens surveys. All PROs in the WEEE Forum, mandated by producers, invest heavily in awareness campaigns – typically millions of

		euro. Campaigns run by the authorities often support or are complementary to these activities.
Question 3	c. Systematically introduce the circular economy into educational curricula	1 Educational activities targeting policymakers, enforcement agencies, civil servants, students and the public at large are key to reach a circular approach in all sectors. Circularity must be added to the curricula.
Question 3	d. Introduce standardised product labelling, product information, including toxic substances, and other consumer transparency measures and tools focusing on circularity	4 New labelling and product information schemes call for an impact assessment. The Digital Product Passport (DPP) has enormous potential to channel information needs to all parties interested. Information in scope must be necessary, sufficient, clear and not redundant. The DPP could enhance competent authorities' ability to determine whether goods declared as second-hand are genuinely reusable products or misdeclared e-waste by providing, for example, data on the product's origin or usage. The importance and potential of the DPP has been explored in <a href="#">CircThread</a> and <a href="#">CE-RISE</a> , two EU research projects in which the WEEE Forum are involved.
Question 3	e. Support Member States authorities' capacity building for the circular economy through training, exchanges on best practices and advisory services	2 The WEEE Forum is supportive of capacity building measures, including sharing good practices. We need to set up educational activities to create a sufficiently qualified working force in the WEEE circular sector
Question 3	f. Support Member States authorities in developing a diverse trainings programme and skill set to meet emerging challenges of circularity	2 EU grants should provide support to Member States competent authorities in developing a diverse training or educational programme and skill set to meet emerging challenges of circularity.
Question 3	g. Work on prevention (e.g. reducing resource use, waste generation, foster re-use)	4 Agree, but the Ecodesign for Sustainable Products Regulation and the Waste Electrical and Electronic Equipment legislation must have distinct yet complementary roles. Overlapping requirements must be avoided at all cost.
Question 3	h. [new] Definition and development of responsibilities of all public and non-public actors that handle and have access to WEEE and are involved in management of WEEE programmes, policies and legislation.	1 This is the principle of all actors that we strongly support: all public and non-public entities that handle and have access to WEEE and are involved in management of WEEE programmes and legislation must have clearly defined responsibilities. Co-ordination bodies must be set up to monitor the market. Competent authorities must enforce the law.
Question 3	i. [new] Development of awareness of citizens	2 One thing is to raise awareness about the importance for people of being mindful about their purchasing behaviour and the need to return end-of-use products and have them

	and consumers of EPR schemes.		responsibly recycled. Another is to encourage a change of mindset through informing people of the functioning of the overall EPR scheme whereby producers are responsible for the lifecycle of their products.
Question 3	j. [new] Fine-tuning of responsibilities of citizens and consumers.	2	People must be actively reminded of their responsibilities, e.g. separate WEEE from other household wastes, return end-of-life products to official collection centres.
<b>Question 4: How important are the following measures to increase the collection of waste electrical and electronic equipment (WEEE)?</b>			
Question 4	a. Make producers legally responsible for meeting national WEEE collection targets	5	<p>EPR must be rethought and redesigned. All actors that have access to WEEE must sit around the table and have responsibilities and obligations. WEEE is a societal challenge, not solely a responsibility for producers and PROs.</p> <p>Policing and forcing that other actors report the WEEE they handle, and that all WEEE flows are responsibly treated, are not an exclusive prerogative of producers.</p> <p>Legislation must set a collection reporting obligation combined with a robust enforcement scheme, for all actors handling WEEE in line with the reporting obligations.</p> <p>Member States must be reminded to refrain from shifting the responsibility for meeting the collection targets to producers or PROs.</p>
Question 4	b. Increase collection targets	3	<p>Increasing minimum collection rates as such will have zero impact on the potential or ability for Member States to reach them.</p> <p>Plus, the collection target methodology laid down in Directive 2012/19/EU is not fit for purpose; it must consider other factors, such as product lifespan, innovative technologies, market trends, consumer behaviour, and the value of secondary raw materials, as well as other types of WEEE management benchmarks. See 2025 research undertaken by Deloitte and commissioned by the WEEE Forum and presented at the European Parliament on 2 June 2025: <a href="#">Towards more meaningful and robust WEEE management targets</a>.</p>
Question 4	c. Impose financial penalties on producers that fail to meet WEEE collection targets	5	<p>Strongly disagree. Imposing financial penalties on producers that fail to meet collection targets, which are demonstrably not fit for purpose (see Question 4.b), is not only unfair but also ineffective, given that other actors also have access to WEEE and that part of the WEEE flow ends up in mixed residual waste.</p> <p>Even if a financial penalty scheme were desirable, implementing it would be impossible. There would be multiple factors to be considered: distance to target per product category, the products' lifespan, consumer habits...</p>
Question 4	d. Increase inspection to uncover illegal	1	Strongly agree. Not only inspection but also sentencing and prosecution to uncover illegal or sub-standard

	exports of WEEE from the EU		<p>practices, and the actors engaging in them, must be significantly improved. Targeted inspection by trained inspectors is key. See also <a href="#">2015 EU funded project Countering WEEE Illegal Trade</a>, in which the WEEE Forum were involved.</p> <p>In a <a href="#">joint statement</a>, multiple associations call for strengthened enforcement mechanisms across all Member States by (a) allocating adequate resources to market surveillance authorities, (b) considering binding enforcement targets for Member States, and (c) exploring the establishment of a dedicated EU-level enforcement body. Alternatively, (d) the role of the European WEEE Enforcement Network (EWEN) could be expanded, along with (e) empowering the European Environment Agency (EEA) with monitoring responsibilities.</p> <p>The enforcement focus must be expanded beyond market entry to include recycling and end-of-life stages and related activities (such as export) and leveraging online marketplaces for digital verification of waste-related obligations.</p>
Question 4	e. Require all actors handling WEEE to register and report quantities through a unified national system	1	<p>Strongly agree. All actors that handle WEEE must register, including those that handle used electricals. See <a href="#">2025 LIFE ECOSWEEE</a> recommendations.</p> <p>The EU must also design a scheme that allows all actors to report the identity and quantity of WEEE they handle by means of a harmonised reporting scheme, guaranteeing better monitoring of WEEE flows, which is a <i>conditio sine qua non</i> of a well-functioning market and level WEEE playing field.</p> <p>The effectiveness of this measure hinges on proper monitoring and enforcement.</p>
Question 4	f. Conduct recurring, product-specific awareness campaigns at national level	1	<p>Targeted, recurring campaigns informed by consumer behavior research are critical.</p>
Question 4	g. Investigate consumer behaviour and barriers to WEEE return as a basis for targeted initiatives	1	<p>The EU and Member States must fund research to understand what makes people hoard their gadgets and what the barriers to return their gadgets are, what would make them return them to official collection points. See also <a href="#">2025 LIFE ECOSWEEE</a>.</p>
Question 4	h. [new] Ban cash transactions at metal scrap dealers.	1	<p>More than 10 years ago, France introduced, to good effect, a ban on cash transactions at scrap metal dealers. The European Commission must propose an EU-wide ban on cash transactions in the scrap metal trade. This idea was first raised with EU officials in 2015, at the publication of the EU financed 2015 Countering WEEE Illegal Trade research.</p>
Question 4	i. [new] Ban WEEE in mixed municipal waste.	1	

Question 4	j. [new] Spell out obligations for online marketplaces.	1	Every product sold into in the single market must have an identifiable economic operator established in the EU who is responsible for the compliance of that products and its packaging with EU legislation. Online marketplaces must be defined as the actor placing products on the market when the seller is located outside the EU or cannot be reached. Online marketplaces must verify that products sold through their platforms either comply with EU rules or are linked to a registered economic operator in the EU/EEA. The traceability of products and sellers must be strengthened.
Question 4	k. [new] Bring actors that engage in illegal practices to justice (prosecution and sentencing).	1	See recommendations arising from <a href="#">2015 Countering WEEE Illegal Trade project</a> .
Question 4	l. [new] Require metal scrap dealers and waste collectors to have a contract with a WEEE EPR scheme	1	
Question 4	m. [new] Require online marketplaces that enable purchase of second hand goods to report transactions regarding used EEE.	1	

#### Question 5: How important are the following measures to incentivise waste electrical and electronic equipment (WEEE) take-back?

Question 5	a. Mandating online sellers to offer free WEEE take-back for delivered electronics	1	In accordance with the #allactors principle, online marketplaces and sellers must be mandated to offer free take-back of end-of-life or end-of-use products.
Question 5	b. Making door-to-door WEEE collection mandatory for municipalities above a certain population size	3	In some Member States door-to-door collection requirements have been implemented for municipalities above a certain population size (see France and Portugal). New WEEE collection schemes must be made subject to cost-benefit analyses that provide evidence of value for money, i.e. for cost-effectiveness compared to alternative schemes.
Question 5	c. Making Commission Recommendation (EU) 2023/2585 that aims to increase the return of used and waste mobile phones, tablets and laptops mandatory	3	Commission Recommendation (EU) 2023/2585 offers multiple effective initiatives that will increase the return of end-of-use and end-of-life products. The WEEE Forum are, amongst other things, supportive of the following propositions: (a) require distributors to inform consumers at point of sale about the possibility to return WEEE or UEEE (Article 11), (b) increase implementation of 1x1 and 1x0 through monitoring and inspection (Article 10), (c) conduct awareness raising campaigns (Article 8).

Question 5	d. Establishing deposit return systems for small appliances (or other products, please specify below)	7	Deposit return systems are not effective for products that are used for a long time and have a long lifecycle. See <a href="#">LIFE ECOSWEEE project</a> .
Question 5	e. Requiring sellers of electrical and electronic equipment to accept WEEE, regardless of where the product was purchased	1	Strongly agree. Distributors must not only accept products they had sold but all products, irrespective of where the products were purchased, therefore including distributors with a small sales area and marketplaces.
Question 5	f. Developing incentives based on consumer preference (e.g. preferences for vouchers over deposit schemes)	5	See the findings of the <a href="#">2025 LIFE ECOSWEEE project</a> .
Question 5	g. [new] Requiring online sellers to offer free WEEE take-back in the territory of the Member State where the electrical and electronic equipment are delivered.	2	Online sellers must offer free WEEE take-back in the territory of the Member State where the electrical and electronic equipment are delivered. The information must be clear and visible for consumers upon purchasing a product.

#### Question 6: What is currently impeding the recycling of critical raw materials (CRMs) from waste electrical and electronic equipment (WEEE) in the EU?

Question 6	a. WEEE diverted to scrap metal yards or large shredders	1	The recovery of CRMs from WEEE is currently, in most cases, an economically unviable business, one of the reasons being that WEEE are diverted to scrap metal yards or large shredders.
Question 6	b. Lack of infrastructure (e.g. collection, sorting and recycling)	4	Disagree. It is not so much the infrastructure that is lacking but the logistics that have to be remodeled and investments that need to be stimulated.
Question 6	c. Lack of scale / a fragmented market	2	True, the collection infrastructure is available, but there is a lack of scale. The (items in the) WEEE flows are currently insufficiently guided to guarantee optimal CRM recovery. The focus should go to the WEEE items with the highest CRM recovery potential. Measures must be taken to improve economies of scale.
Question 6	d. Insufficient technology readiness	2	The EU must continue its Horizon Europe research and innovation programme, funding projects that explore new recovery technologies.
Question 6	e. The concentration of CRMs in electrical and electronic equipment components is too low to qualify for recycling	2	The concentration of CRMs in many product categories is extremely low. Plus, the concentration differs from product to product and even within the same product model. In some types of equipment, e.g. home appliances, the CRM content is low and not concentrated in a limited number of components, but spread in very tiny concentrations over

			several small components (see <a href="#">APPLiA</a> , <a href="#">PERMANET</a> , <a href="#">FutuRaM</a> ).
Question 6	f. Insufficient removal of electrical and electronic equipment components	2	The challenge is to design technologies and processes that guarantee high recycling rates in an economically viable manner. In the EU, involving manual dismantling in the processes is excessively expensive. That is the reason why multiple PROs in the WEEE Forum are exploring the role of automation and AI in retrieving components and materials in components. Without supplementary financial, fiscal and regulatory incentives, even automation will not make the business viable, due to the low concentration and dispersed nature of CRMs in WEEE. The Eco-design Regulation can play an important role here.
Question 6	g. Low price of virgin primary CRMs	4	
Question 6	h. Low price of imported secondary CRMs	2	
Question 6	i. The quality of secondary CRMs is lower than primary ones	4	The low quality of recyclates is a factor and there are other factors. Uncertainty about the quality and purity of recyclates plays a role in addition to (uncertainty about) the quantity of supply of recyclates of a certain quality. Uncertainty deters businesses' involvement in secondary raw materials markets.
Question 6	j. Insufficient demand for secondary CRMs	2	One critical factor that would improve the market for secondary CRMs and stimulate demand is the predictability of the quality and purity of (critical raw) materials, which hinges on the effectiveness of the recovery technologies and processes and the efficiency of the value chain. Furthermore, most component and parts manufacturers that need materials are based outside the EU. The EU must therefore put in place a programme that strengthens European manufacturing capacity: complement the Net-Zero Industry Act, the Critical Raw Materials Act, the European Chips Act and InvestEU with a reshoring programme and a "Made in Europe" label for strategic high-tech components, enhancing quality, safety, sustainability, and resilience.
Question 6	k. High energy costs of recycling	2	
Question 6	l. Insufficient information on CRMs in WEEE available to recyclers	2	The WEEE Forum are leading <a href="#">FutuRaM</a> , a Horizon Europe grant-funded project, that maps CRMs in WEEE and seeks to understand availability and recoverability of CRMs in WEEE, and participate in the PERMANET project, seeking circularity for permanent magnets. Both research projects have shown that the heterogeneity, low content, diverse quality and difficult access of CRMs in WEEE are key obstacles for their recovery and for the viability of the business. The sector therefore requires support.
Question 6	m. Electrical and electronic equipment	5	Whilst more products could be designed with circularity (reparability, dismantling, reuse) in mind, the indiscriminate

Question 6	<p>not designed for recycling</p> <p>n. [new] Outdated industrial policy</p>	1	<p>claim that electrical and electronic equipment is not designed for recycling is erroneous.</p> <p>The recovery of CRMs from WEEE calls for a rethinking of industrial policy: Member States must actively collaborate to turn it into a functioning model. The new industrial policy must be underpinned by bespoke competition rules. The EU does not have an integrated approach. The benchmarks in the CRM Act will not be reached unless CRM recovery is co-ordinated at EU level among Member States. One key question is: where recovery is technologically feasible, how do we create economies of scale?</p>
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**Question 7: To what extent do you agree that the current waste of electrical and electronic equipment categories should be expanded?**

Question 7	a. Setting a new category for renewable energy-related equipment, including photovoltaic panels, wind turbines and others	3	
Question 7	b. Setting a new category for photovoltaic panels (from current category 4 into to a new category)	1	Photovoltaics have a long lifespan and are a specific product category.
Question 7	c. Setting a new category for wind turbines	3	
Question 7	d. Setting a new category for digital and telecommunications equipment (e.g. data servers)	3	
Question 7	e. Setting a new category for seabed cables, large industrial cables	3	
Question 7	f. Setting a new category for non-mobile road machinery	3	
Question 7	g. Setting a new category for large-scale stationary industrial tools	3	
Question 7	h. Setting a new category for large-scale fixed installations	3	

Question 8: To what extent do you agree with the following measures to improve the Extended Producer Responsibility (EPR) system for waste electric and electronic equipment (WEEE)?

Question 8	a. EPR financing needs to be harmonised across the EU as well as registration and reporting requirements	4	In the past twenty-odd years, PROs have created financing solutions and EPR schemes, in response to market specificities and Member State regulations. Harmonising those financing schemes would be challenging and would possibly not cover special needs.
Question 8	b. EPR fees for electrical and electronic equipment should remain unchanged	3	Every PRO defines its own set of EPR fees, in response to variable market specificities.
Question 8	c. Member States should do regular compositional surveys of the collected mixed municipal waste stream to determine the share of WEEE	1	Member States must periodically conduct compositional surveys of mixed municipal waste to determine the share of WEEE. The better the knowledge about the quantity, composition and nature of the flows, the more evidence-based and better informed policymaking will be. Some Member States already run such campaigns, but WEEE may be out of scope of the compositional surveys or the outcome of these compositional surveys may not be made available for interested parties.
Question 8	d. EPR fees should cover costs additional to the costs currently covered under the current WEEE Directive (from collection to recycling). These include awareness campaigns, compositional surveys, data gathering and reporting, and deducting any revenues obtained from preparation for re-use or preparation for repurposing or from the value of secondary raw materials recovered from recycled WEEE	2	Most PROs of the WEEE Forum, all of them not for profit entities, include in their EPR fees costs associated with awareness campaigns, compositional surveys, data gathering and reporting, and deducting any revenues obtained from preparation for re-use or preparation for repurposing or from the value of secondary raw materials recovered from recycled WEEE. The EPR fees do not necessarily reflect the actual costs.
Question 8	e. EPR business-to-business and business-to-consumer obligations should remain different (as is the case in the current WEEE Directive)	2	The management of business-to-business equipment differs substantially from the management of business-to-consumer products on account of products' lifetimes, collection channels, the level of product standardisation, the role of municipal collection facilities, the role of distributors, contracting and managed control of the flow. EPR business-to-business and business-to-consumer obligations should therefore remain distinct.
Question 8	f. The difference between EPR business-to-business and business-to-consumer	3	

	obligations should be reduced to the minimum	
Question 8	g. EPR fees should also be eligible for financing behavioural research and targeted consumer initiatives, because the consumer's decision to return or not return WEEE is crucial to the quantity and quality of collected material	1

Question 9: How important is it to simplify (e.g. through harmonisation) the following rules in order to improve the single market for waste and secondary raw materials?

Question 9	a. Extended Producer Responsibility	2	It is important to simplify, digitalise and harmonise registration and reporting in order to mitigate complexity and bureaucracy. The WEEE Forum are involved in EU grant-funded research to explore this challenge (see <a href="#">2025 LIFE4EPR project</a> ). Simplification however must not prevent producers to benchmark services provided by PROs, and make informed decisions when selecting a collective solution to meet their EPR obligations.
Question 9	b. End-of-waste criteria	2	Improving end-of-waste criteria involves better definitions of end-of-waste, the range of materials subject to end-of-waste status, more inspection and monitoring to enhance compliance, procedures to obtain end-of-waste status, quality standards, good data gathering practices, more efficient markets for recyclates. The end-of-waste criteria are supposed to effectively clarify when secondary materials are considered valuable resources.
Question 9	c. By-product criteria	2	The WEEE Forum are supportive of the proposition to simplify by-product criteria.
Question 9	d. Permits (e.g. for establishing a recycling facility)	2	The WEEE Forum are supportive of the proposition to harmonise procedures to obtain permits.
Question 9	e. Rules on cross-border waste shipments within the EU	2	The rules on cross-border waste shipments within the EU are excessively complex. The WEEE Forum are supportive of the proposition to simplify the rules governing cross-border shipments within the single market.
Question 9	Other Please Specify		

Question 10: How important are the following obstacles preventing waste from being recognised as reaching the end-of-waste or a by-product status?

Question 10	a. Heterogeneity of end-of-waste and by-product criteria	2	A single market calls for a harmonised set of rules, definitions and criteria as well as mutual recognition of Member State rules.
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Question 10	b. Existence of sub-national/local end-of-waste and by-product criteria	1	A single market calls for a harmonised set of rules, definitions and criteria as well as mutual recognition of Member State rules.
Question 10	c. Existence of national end-of-waste and by-product criteria	2	A single market calls for a harmonised set of rules, definitions and criteria as well as mutual recognition of Member State rules.
Question 10	d. Lack of mutual recognition between national end-of-waste and by-product criteria	2	A single market calls for a harmonised set of rules, definitions and criteria as well as mutual recognition of Member State rules.
Question 10	e. Lack of EU-wide end-of-waste and by-product criteria	1	A single market calls for a harmonised set of rules, definitions and criteria as well as mutual recognition of Member State rules.
Question 10	Other Please Specify		

#### Question 11: How important are the following reforms to facilitate the attainment of the end-of-waste and by-product status?

Question 11	a. Swiftly develop additional EU-wide end-of-waste and by-product criteria	1	
Question 11	b. No longer allow sub-national/local end-of-waste and by-product criteria	1	
Question 11	c. Enable mutual recognition of national end-of-waste and by-product criteria	2	
Question 11	d. Further develop the provisions for the end-of-waste and by-product criteria in the Waste Framework Directive	2	
Question 11	Other Please Specify		

#### Question 12: To what extent do you agree with the following statements about Extended Producer Responsibility schemes?

Question 12	a. Producer responsibility organisations should be regulated at Member State level	3	PROs have created financing solutions and EPR schemes, in response to market specificities and societal expectations and Member State regulations. Harmonising those financing schemes would be challenging and may hinder a tailored approach accommodating for Member States peculiarities.
Question 12	b. Producer responsibility	3	The EU's WEEE ecosystem of rules, standards, technologies, infrastructure and practices is the most

	organisations should be regulated at EU level	advanced in the world (see the <a href="#">Study supporting the evaluation of Directive 2012/19/EU on WEEE</a> ).
Question 12	c. Various actors in the life cycle of the product should be represented in producer responsibility organisations	In order to improve the governance of the EPR system at EU level, (a) more robust authorisation criteria, including minimum market share thresholds, must be laid down, (b) clearing houses or co-ordination centres must be required where multiple PROs exist, ensuring coordination, efficiency, and equitable conditions, (c) clear governance and control mechanisms to safeguard financial stability and future reserves and (d) monitoring of freeriding through effective and co-ordinated control mechanisms also at EU level. These measures would reduce fragmentation, optimise costs, and ensure a level playing field that strengthens PROs' role in achieving EU circular economy goals.
Question 12	d. Extended Producer Responsibility fees should cover the entire waste management costs (e.g. collection, transport and treatment)	The important thing is to foster collaboration among all actors and secure their representation in centres of co-ordination. The decision to involve other actors and how to involve them must be for a PRO to make. See <a href="#">2020 WEEE Forum vision</a> . Involving actors of the downstream sector may give rise to conflicts of interest as they are service providers to PROs.
Question 12	e. Extended Producer Responsibility fees should cover waste prevention (e.g. re-use, repair and waste prevention campaigns)	EPR fees must cover all waste management costs as well as overhead, communication. Costs must take into account revenues, e.g. associated with the recovery and sale of materials. The WEEE Forum and the PROs in the WEEE Forum are available to share their know-how on the calculation of EPR fees. PROs must be not-for-profit. Environmentally sound management of WEEE should not give rise to profits. Not-for-profit PROs founded by producers are best positioned to balance efficiency with long-term societal, social and environmental value, while for-profit models will be inclined to prioritise financial gains. The financing of necessary costs that will likely be incurred in the future must be anticipated by building provisions.
Question 12	f. Extended Producer Responsibility fees should be modulated (lower or higher) depending on the circularity performance of related products	The exclusive role of WEEE legislation is the governance of management of the end-of-life stage of products. Costs associated with that stage in the lifecycle of products, e.g. the selection of products for preparation for re-use, must be covered by EPR fees. WEEE legislation must not deal with the design of products nor with stages of a product's lifecycle before it is disposed of, e.g. re-use of products that have not been discarded. Research commissioned by the WEEE Forum in 2021 has provided evidence that a <a href="#">modulation of the environmental contribution</a> not going beyond necessary costs, as required by Waste Framework legislation, does not stimulate consumers to purchase nor producers to manufacture more environmentally friendly products.

		As costs incurred for collection, handling, communication and overhead do not vary among products, the modulated environmental contribution must be limited to a product's recycling costs, which is the case of most EPR fees of PROs in the WEEE Forum; they take into consideration specific treatment costs per WEEE stream, also known as 'simple' eco-modulation.
Question 12	g. Transparency should be required on how fees are determined and how they are spent	3 PROs in the WEEE Forum are periodically subjected to audits in association with quantities of electrical and electronic equipment reported as placed on the market, quantities of WEEE reported as collected as well as the overall (financial) management of the organisation and processes. See their annual reports for further guidance.
Question 12	h. The issue of 'free riders' (producers that do not register for Extended Producer Responsibility) needs to be addressed	1 Absolutely. The issue of businesses that fail to register for EPR calls for effective action. The EU can play a much bigger role in countering free-riding, including co-ordinating initiatives with the Member States competent authorities.
Question 12	i. Ensuring cost efficiency is a key objective of Extended Producer Responsibility	1 PROs are supposed to be mandated and controlled by producers, for whom securing cost-effectiveness of systems, operations and processes is critical in addition to legal compliance.
Question 12	j. Ensuring high recycling rates is a key objective of Extended Producer Responsibility	1 Ensuring high recycling rates involves close collaboration and long-term partnerships between the recycling industry and manufacturing industry. In that respect, a harmonised calculation of recycling rates (see the WEEE Forum's bespoke <a href="#">WF-RepTool2</a> reporting methodology) and proper treatment through mandatory standards are equally critical.
Question 12	k. Ensuring minimal landfilling of waste is a key objective of Extended Producer Responsibility	1 Ensuring minimal landfilling of waste is a key objective of EPR and the recycling sector. Therefore it is important to collect information about WEEE processing, composition of WEEE and the destination of WEEE flows.
Question 12	l. Ensuring minimal incineration of waste is a key objective of Extended Producer Responsibility	1 Ensuring minimal landfilling of waste is a key objective of EPR.
Question 12	Other Please Specify	

Question 13: To what extent do you agree that EU mandatory Extended Producer Responsibility systems would benefit for the following product groups?

Question 13	a. Agricultural plastics	3
Question 13	b. Tyres	3
Question 13	c. Mattresses	3
Question 13	d. Furniture	3

Question 13	e. Construction products	3
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#### Question 14: How important are the following digitalisation measures to simplify Extended Producer Responsibility (EPR) systems?

Question 14	a. Setting up a national webpage for each EPR system	1	The LIFE4EPR project, which commenced early 2025, conducted a mapping of PROs for most waste streams in the 27 Member States. The D2.1 report will soon be published.
Question 14	b. Setting up an EU-level webpage for all EPR systems	1	Setting up an EU-level website listing all EPR schemes is a feasible and desirable objective. LIFE4EPR will provide an online database with this information. The EU should maintain the database after the end of the project.
Question 14	c. Turning an EU-level online registration of producers into an EU-level EPR register	3	Setting up an EU-level portal that allows businesses to register online is a feasible and desirable objective.
Question 14	d. Turning an EU-level online registration into national EPR registers	3	The EU must consider developing a centralised, user-friendly, standardised system for producer registration and product declarations. LIFE4EPR, an EU grant-funded project in which the WEEE Forum are involved, is exploring what is required to simplify, digitalise and harmonise registration and reporting, also in terms of interconnection of platforms and consolidation of data emanating from existing portals. Preliminary findings of the project are that, whilst developing an EU producer register may be feasible and desirable, extending it to product and waste collected declarations may be fraught with challenges. The majority of producers of electrical and electronic equipment register and report their placed-on-market quantities through PROs. Digitalisation may provide a solution to simplify the reporting process whilst keeping sufficient data granularity that will satisfy existing parties.
Question 14	e. Setting up an EU-level online platform to register and access national EPR schemes (one-stop-shop)	3	
Question 14	Other please specify		

#### Question 16: How important are the following measures in increasing the demand of secondary raw materials?

Question 16	a. Minimum recycled content targets	3	Minimum recycled content targets call for standardised methods of measurement as well as measures to mitigate the risk of sudden price increases due to demand outstripping supply as a result of legal minimum recycled content requirements. To that effect, the EU must establish
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			price stability mechanisms, i.e. bandwidths of allowable price fluctuations. Content targets also call for dynamic regulatory instruments that ensure the targets remain realistic. The EU must consider fiscal incentives for businesses and consumers purchasing products with recycled European materials.
Question 16	b. Minimum EU-made recycled content targets	3	The EU must seriously consider the proposition to mandate minimum shares of EU-recycled content in products placed on the single market, considering recycled content requirements in other pieces of legislation. The EU must also promote manufacturing capacity in the EU and complement existing initiatives (CRM Act, European Chips Act, InvestEU, REsourceEU) with reshoring policies and a “Made in Europe” label for strategic high-tech components, enhancing quality, safety, sustainability, and resilience of the economy.
Question 16	c. Public procurement rules favouring products/companies using secondary raw materials	2	
Question 16	d. Public procurement rules favouring products/companies using EU-made secondary raw materials	2	
Question 16	e. EU-wide standards on the quality and traceability of secondary raw materials	1	
Question 16	f. Measures to further reduce the landfilling of waste	2	
Question 16	g. Information on the quality and origin of secondary raw materials	1	
Question 16	h. Price incentives for products or companies using EU-made secondary raw materials (e.g. value-added tax exemptions and tax credits)	1	
Question 16	i. Price disincentives for products or companies using primary raw	1	

	materials (e.g. taxes and carbon cost)		
Question 16	j. Stronger support from extended producer responsibility schemes for the uptake of secondary raw materials (e.g. eco-modulation of Extended Producer Responsibility fees)	4	The uptake of recyclates hinges on recyclers, producers and PROs working together. Research commissioned by the WEEE Forum has provided evidence that eco-modulation of EPR fees is an ineffective policy tool.
Question 16	k. Stronger market surveillance	1	
Question 16	l. Support to increase waste recycling activities in the EU (e.g. financial support for new capacities)	2	

**Question 17: To what extent do you agree with the following statements on public procurement?**

Question 17	a. Public procurement can be a significant driver of the circular economy	1
Question 17	b. Circularity criteria should complement price criteria	2
Question 17	c. Circularity criteria should be optional for contracting authorities to use	4
Question 17	d. Circularity criteria should be mandatory for contracting authorities to use	2
Question 17	e. Circularity criteria should apply to specific products' aspects (e.g. durability, reparability, recyclability and recycled content)	2

**Question 18: In order to support the transition to circular economy in the EU, which goods or services should be prioritised for public procurement criteria?**

Question 18	In order to support the transition to circular economy in the EU,	Through criteria, public procurement policies must promote the goods and services with the lowest negative environmental impact.
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which goods or services should be prioritised for public procurement criteria?

Including criteria related to electrical and electronic equipment in the scope of green public procurement will certainly improve collection rates.

Public procurement processes must require evidence of the purchase of EPR compliant, i.e. officially registered, products and priority must be given to the purchase/use of eco-designed products.

Contracts should include the handover of discarded equipment to the official EPR scheme.

**Question 19: To what extent do you consider it important to improve the scrap classifications and trade codes for steel, aluminium and other secondary raw materials?**

Question 19	a. Additional scrap classifications for recycled steel	1
Question 19	b. More granularity in trade codes for recycled steel	2
Question 19	c. Additional scrap classifications for recycled aluminium	2
Question 19	d. More granularity in trade codes for secondary aluminium	2

**Question 20: How important are the following measures in reducing the export of products and waste streams containing critical raw materials and increasing recycling capacity within the EU?**

Question 20	a. Introducing export fees for certain waste streams that contain critical raw materials and reinvesting the revenues generated into domestic recycling infrastructure and technology	3
Question 20	b. Tightening controls or restrictions on the export of waste that contains critical raw materials	1
Question 20	c. Enhancing transparency and reporting requirements for exports of secondary raw materials	2
Question 20	d. Introducing further regulatory requirements	2

	(e.g. for environmental objectives) on exports of secondary raw materials	
Question 20	e. Prioritising access to critical raw materials for strategic EU sectors before authorising exports	1
Question 20	f. Aligning with practices of non-EU countries that restrict critical raw materials exports to support domestic recovery	1

**Question 21: How important are the following elements into improving waste management systems?**

Question 21	a. Further limit the use of derogations from the obligation on Member States to establish separate collection systems for certain waste streams (Article 10(3) of the Waste Framework Directive)	1	Limited use of derogations from the obligation on Member States to establish separate collection systems for certain waste streams will result in better recycling, cleaner waste fractions.
Question 21	b. Establish a harmonised methodology at EU level to conduct compositional analysis of the mixed waste	2	The WEEE Forum have consistently called on the EU to design uniform methods governing compositional analysis of the mixed waste stream. Uniform methods will lead to better monitoring and more meaningful benchmarks. WEEE must be included in the scope of the mixed municipal waste compositional surveys. The information arising from those surveys must be shared publicly and used in the design of waste management programmes.
Question 21	c. Introduce a legal obligation to use advanced sorting facilities for mixed municipal waste	2	A limited use of derogations from the obligation on Member States to establish separate collection systems for certain waste streams will result in advanced sorting facilities and technologies.

**Question 22: To what extent do you agree with the following measures to reduce the landfilling or incineration of waste and incentivising recycling?**

Question 22	a. Strengthening the provisions on enforcement of EU legislation concerning landfilling and uncontrolled dumping of waste	1	
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3Question 22	b. Introducing a general ban on landfilling of waste	3
Q3ueston 22	c. Introducing (additional) bans on landfilling for specific types of waste	3
Question 22	d. Tax policy aimed at taxation of landfilling waste in the EU	2
Question 22	e. Tax policy aimed at taxation of incinerating waste in the EU	2
Question 22	f. Introducing a market-based instrument (e.g. cap-and-trade systems) for landfilling waste in the EU	3
Question 22	g. Ensuring a level playing field for circular products by eliminating value added tax (VAT) embedded in the value of recycled goods used as input	1 An elimination of VAT embedded in the value of recycled products used as input will contribute to an improvement of circularity. It is more a measure promoting circularity than promoting a reduction in landfilling or incineration.

**Question 24: How important are the following measures for the management of extractive waste and supporting the recycling of critical raw materials (CRMs) from extractive waste?**

Question 24	a. Improved data availability on the recycling potential of CRMs in extractive waste facilities across the EU	7
Question 24	b. Ensuring a high level of environmental and human health protection	7
Question 24	c. Promoting research and innovation in new and emerging technologies	7
Question 24	d. Adopting mandatory best available techniques (BAT) conclusions for the management of extractive waste	7

Question 25: Do you agree that amending the List of Waste (Commission Decision 2000/532/EC) to cover new waste streams or to revise existing entries would benefit the efficient and circular management of waste?

How important is it to specifically include the following waste streams into the List of Waste?

Question 25	a. Waste from photovoltaic panels	2
Question 25	b. Waste from permanent magnets	2
Question 25	c. Waste from glass and carbon fiber composite materials	2
Question 25	d. Separately collected bio-waste	2
Question 25	e. Metal waste from mechanical and physical treatment going beyond specification of ferrous and non-ferrous	2
Other		<p>Adding these new waste streams to the EWC list will facilitate waste management from an administrative and reporting point of view, as certain types of wastes will be better identified and traced. The question begs, however, how this can stimulate circularity.</p> <p>The EWC list should focus on material types rather than waste streams.</p>

Question 26: To what extent do you agree with the following interventions to facilitate the establishment of trans-regional circularity hubs that promote smart specialisation and economies of scale for (separate) collection, sorting and recycling?

Question 26	a. Legal enablers (e.g. permitting, licences and permits)	1	As a minimum, the EU should enable by means of legal instruments the establishment of trans-regional circularity hubs that promote smart specialisation and economies of scale for (separate) collection, sorting and recycling
Question 26	b. Financial enablers (e.g. tax breaks and public and private funding)	1	Tax breaks and public and private funding are effective in facilitating the creation of circularity hubs that promote smart specialisation and create economies of scale for collection, sorting and recycling.
Question 26	c. Information provision (e.g. digital platforms matching supply and demand)	1	Digital platforms matching supply and demand of materials are an effective means to facilitate the creation of trans-regional circularity hubs. The WEEE Forum are involved in <a href="#">PERMANET</a> , a Horizon Europe project, that will design such a platform.

Furthermore, PERMANET is also identifying barriers for the operation of international and sub-national hubs. Two of the main ones are implementation of Waste Shipment

		Regulation (often entailing administrative burden, long processing of shipment permits) and different classification of waste (hazardous vs non-hazardous).
Question 26	d. Capacity building in national, regional and local authorities	1 Capacity building in Member States and sub-national competent authorities are effective in facilitating the creation of trans-regional circularity hubs that promote smart specialisation and economies of scale.

Question 27: Industrial processes often not only produce the core output but also provide side streams or by-products. Those could become an input for another industrial process, which could then be valorised, creating an industrial symbiosis. Is that the case for your industry?

How important are the following hindering factors?

Question 27	a. No EU harmonised definition of by-products	1	The lack of a harmonised definition of by-products is a critically important factor hindering industrial symbiosis.
	b. Insufficient harmonisation / clarity of rules for waste classification	1	The lack of clear rules for waste classification is a critically important factor hindering industrial symbiosis.
	c. Overly burdensome waste shipment	1	Complex waste shipment rules are a critically important factor hindering industrial symbiosis
	d. Lack of platforms or hubs to facilitate matchmaking between companies	3	
	e. Lack of facilitation	2	
	f. Lack of awareness of or expertise in industrial symbiosis	3	
	g. High initial investments costs	2	
	h. Uncertain return on investment	2	
	i. Data confidentiality	4	
	j. Insufficient regulatory incentives or regulatory push	2	
	k. Insufficient tax incentives	2	
	l. Limited support for SMEs participation	2	
	m. Proximity/transport	3	
	n. Risk of unstable supply of by-products	2	
	o. Doubts about quality of by-products	2	

Question 28: Do you agree with the following statements about the benefits and challenges in conducting pre-demolition and pre-renovation audits?

Question 28	a. The audit improves planning of selective demolition	3	<p>Whilst the WEEE Forum are not familiar with the content and scope of the audits referred in Question 28, it is true that e-waste is often present in construction and demolition waste and may follow varied fates. Audits can help identify WEEE present in construction and demolition waste and prevent WEEE ending up in the wrong waste channels and ensure it is properly sorted and managed through an EPR compliant process. This is why our score for option b, c and e is 1.</p> <p>Additionally, compositional surveys can identify e-waste present in construction and demolition waste and ensure it is properly sorted and managed through an EPR compliant process.</p>
Question 28	b. The audit increases reuse/recycling of materials	1	
Question 28	c. The audit reduces landfilling	1	
Question 28	d. The audit allows better cost estimation and project control	3	
Question 28	e. The audit supports circular economy targets	1	
Question 28	f. The audit leads to high administrative burden	3	
Question 28	g. A harmonised database would improve pre-demolition and pre-renovation audits	3	
Question 28	h. Pre-demolition and pre-renovation audits should be mandatory	3	
Question 28	i. Pre-demolition and pre-renovation audits should be digital	3	
Question 28	j. High costs (especially for small-scale projects)	3	
Question 28	k. Lack of expertise is a challenge	3	

Question 28	I. Lack of a market for recycled materials is a challenge	3
Question 28	m. Demolition contractors would duplicate the audits	3

Question 29: What impact do you expect measures supporting EU circularity (particularly measures on WEEE; improving the single market for secondary raw materials; measures on the supply and demand of secondary raw materials; and measures improving waste management systems) to have on international trade?

Question 29

The WEEE Forum expect measures supporting circularity to create opportunities for global value chains as well as incentives to make products more circular.