

# WEEE in Europe – successes and challenges over the decade

Iiiee, Lund

By Martin Therkelsen



- 2004-2009 Electrolux representative in developing ERP SAS
  - From 2009, MD for ERP Denmark ApS
- 2011 Leader of the Nordic Region, with ERP companies in Norway-Finland and Sweden
  - ERP is operational in DK-NO and Finland
  - In Sweden we operate in cooperation with EÅF
  - We collect and treat annually > 80 kt waste in all WEEE categories and Batteries

# European Recycling Platform



Established in **2004**

Being a company of the Landbell Group since **2014**



**Services:**

Take-back services (e-waste, batteries & packaging), consulting and software services in 32 countries

**Waste collected:**

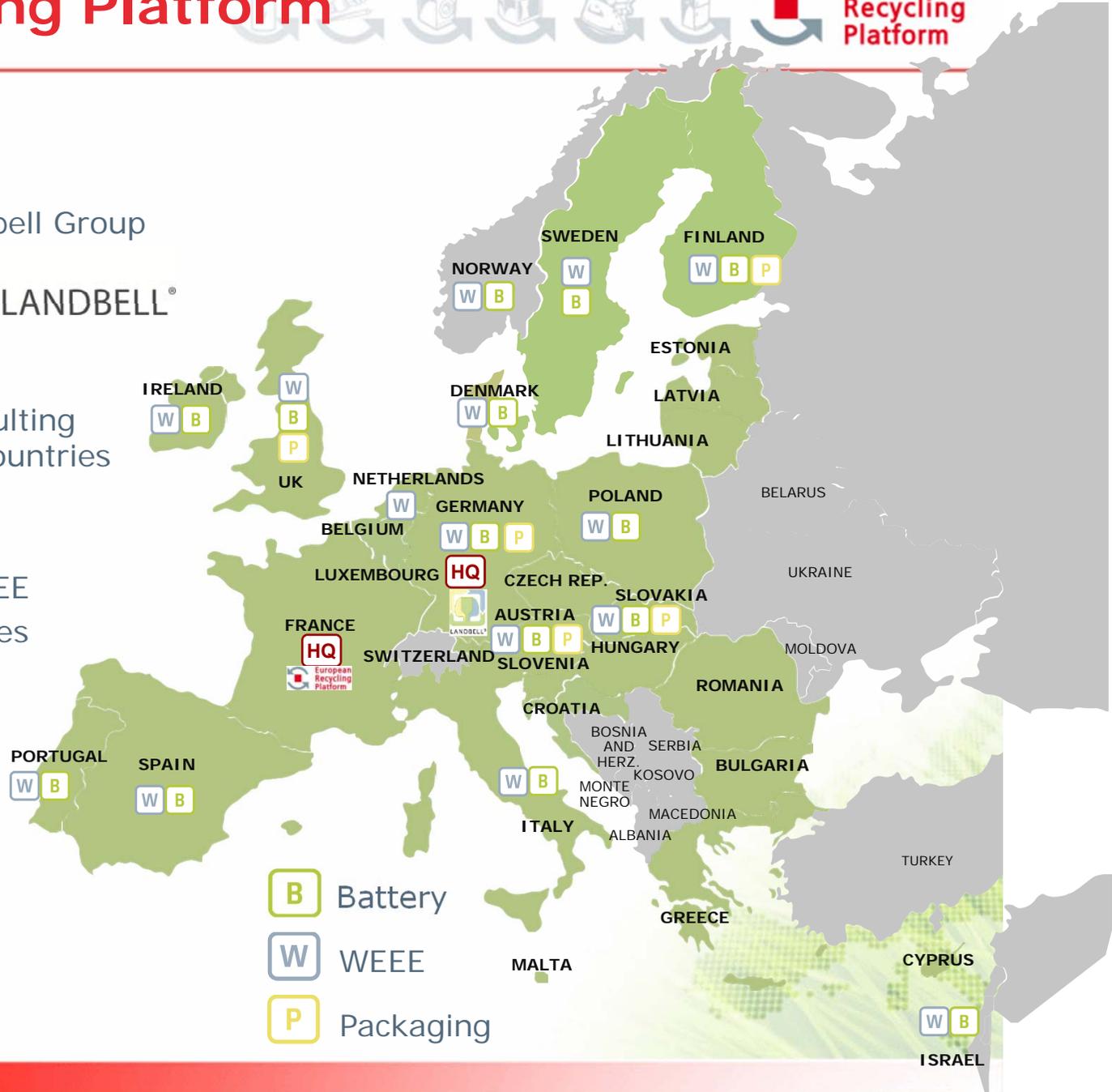
- over 2,700,000 tons WEEE
- over 39,000 tons Batteries
- over 7,000,000 tons Packaging\*

**Geographical presence:**

15 countries

**Customers:** over 3,000 contracts with producers and importers

\* Including volumes of the Landbell AG



# EPR – some major achievements



## Higher Recovery Rates

- WEEE, waste packaging and waste batteries have been largely diverted from general municipal waste (e.g. landfill) by separate collection
- Consequently much more **Material or Energy Recovery** (see also next slide)

## Innovation / Higher Quality

- **Industry-Wide Treatment standards assure quality treatment**
  - Legally enforceable in some countries: Netherland, Ireland...)
  - Weelabex being gradually replaced by equivalent Cenelec
- **Treatment control** e.g. Weelabex verification process **assures**
  - Implementation of standards
  - Better control on exports

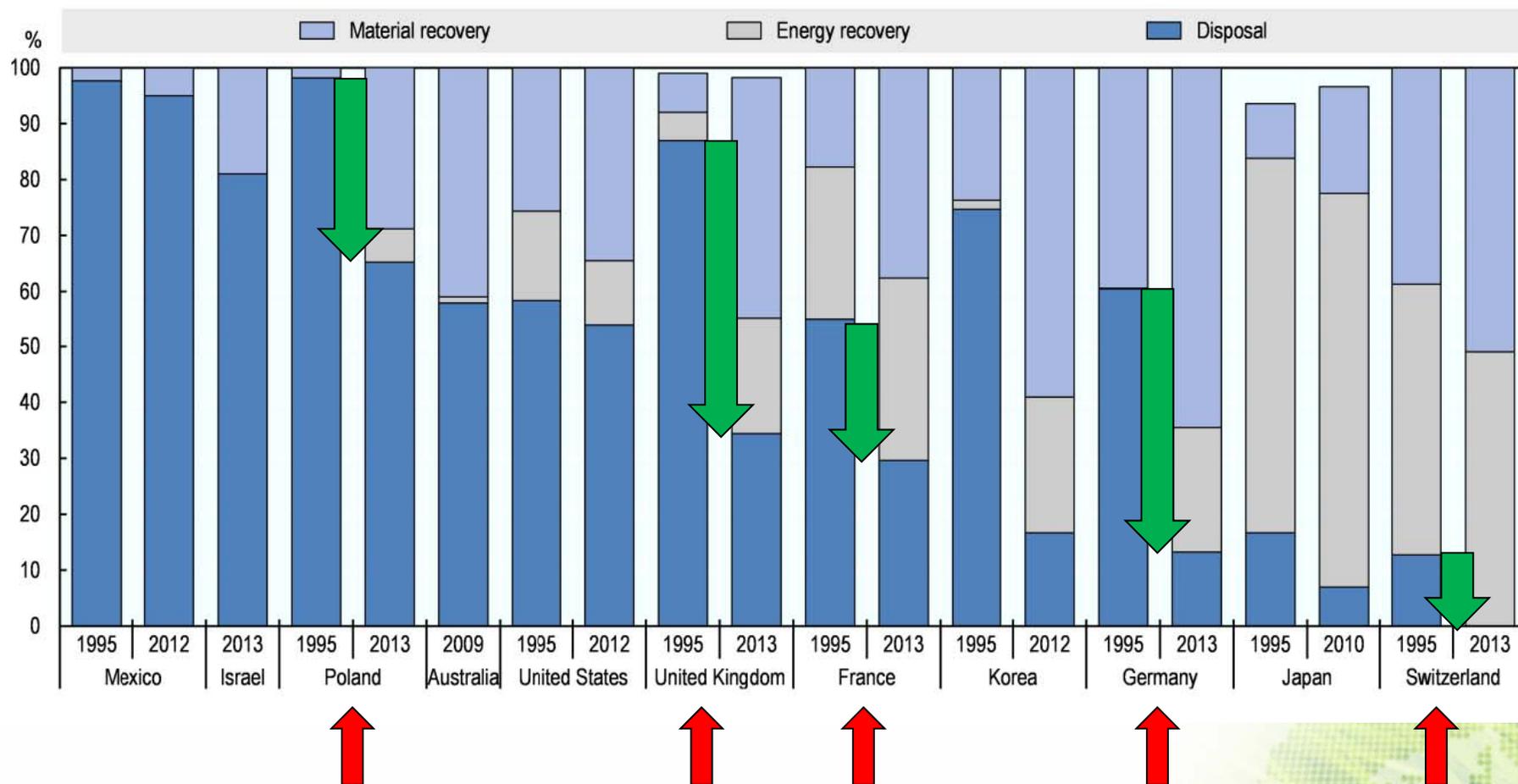


## Financially

- **“Polluter pays” principle** implemented EU wide (producer financing take-back and treatment) -> reducing the burden on public budgets and taxpayers
- **Competition** in the EPR market reduced burden for producers (ultimately consumers)

# OECD Data (WEEE and Packaging)

- Significant Reduction of the Disposal of WEEE and packaging in European countries with EPR



Source: OECD (2015), "Municipal waste", OECD Environment Statistics (database)

# However we are far from level playing field



## Treatment

- ❑ Operators still do not all operate at same technical level despite existing standards
- ❑ PROs apply different control mechanism
- ❑ Unnecessary legal rules limiting free choice of treatment plants (country specific)
- ❑ Still we see illegal exports instead of proper treatment

## Clearing

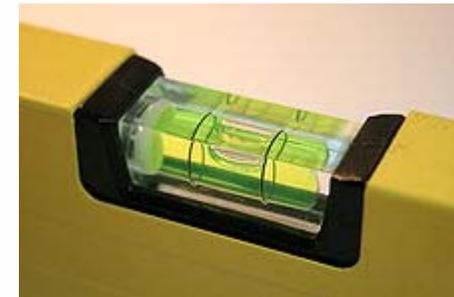
- ❑ PROs do not everywhere embrace all their fair share of obligation (country specific)
- ❑ Cherry-picking by PROs possible

## Free-Riding

- ❑ Producers free riding is not always challenged

## Access to waste

- ❑ PROs don't have access to all waste (cherry-picking by other actors)
- ❑ PROs often have no control over access to waste cost (if collection points operated by municipalities)



# Challenges seen by PROs

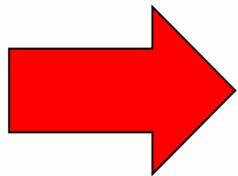


## Undermining EPR principle

- In UK, municipalities can opt out, while it was illegal under previous regs
- In Germany, municipalities can opt out since WEEE1

## Unnecessary Burden

- In Italy, compliance schemes must have a mandated “consortium” legal form with standard bylaws. The environmental benefit of the measure has yet to be explained
- In France, MoE is active pushing draft decree describing to a very detailed level how compliance schemes should work
- In Portugal, there are moves to restrict how schemes reserves can be used, limiting producers investment capabilities



- Producers face “overregulation” = are stripped of their entrepreneurial freedom, while asked to achieve rates and finance the system
- EPR is looked at in several countries as a parafiscal tool for municipalities rather than an economic incentive for the environment

# Threats affecting EPR in Europe



- **Monopolies** or tendencies towards recreation of monopolies - limiting innovation and efficiency
- **Non for profit requirements** - limiting incentive to invest into innovation (while the fear of excessive profits can be easily limited by competition)
- **Producer governance requirements** (on legal form, the ownership or the executing committees) – limiting the entrepreneurial freedom but creating additional burden and higher costs for producers without any economic or environmental merit
- **Lack of enforcement** – leading to free riders, poor treatment quality or illegal exports



# ERPs view on EPR



ERP sees EPR as a proven **powerful tool** for the environment.

Managed pragmatically, EPR

- Delivers **environmental benefits contributing to a circular economy** at reasonable cost to the society
- Provides **competitive advantage to proactive and innovative producers**

But there is **potential for improvement...**



# ERPs recommendations



## 1. Entrepreneurial Freedom & Competition

- **Avoiding market inefficiencies** but **activating the required innovative capacity** to achieve a true transition towards a circular economy.
- Allowing **producers to flexibly choose among PROs** competing in service quality = the **best way** for producers **to take influence** on “their” EPR solution.
- **Clear operating conditions and responsibilities** instead of requirements on the setup of a PRO such as the legal form, the ownership or the executing committees.

## 2. Fair Level Playing Field

- **Define roles and responsibilities of all actors** and general requirements for EPR schemes on the basis of a **harmonised EU guidance**.
- Establish **single independent national authorities** that assure proper **enforcement** and a reasonable **governance** over PROs avoiding conflicts and unfair market practices.
- Establish **harmonized minimum technical treatment standards** in order to boost the level playing field at the operational level.

## 3. EPR Scope

- Clearly define the **scope of the costs covered by producers**.
- **Avoiding inequitable additional charges** for items and waste streams that are **beyond the control of producers** or PROs acting on their behalf.



# Questions and Comments?



謝謝 Danke Thank you Dziękuję Takk  
Takk Grazie Tak Ďakujem Kiitos Tack  
Gracias תודה Obrigado Grazie Tak Merci  
Grazie Merci Dank u Gracias Danke 谢谢  
Thank you Tack Dziękuję Merci תודה Tak  
谢谢 Takk Grazie Dank u Ďakujem Kiitos  
Gracias Obrigado Grazie Thank you 謝謝

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