

NOTAT

Til: EU Commission, DG Environment

Fra: *waste denmark*

Review of WEEE in EU

waste denmark has received a stakeholder consultation document regarding the review of the WEEE Directive. *waste denmark* is an interest organisation for major public and private waste management companies in Denmark.

This memo presents *waste denmark*'s comments to selected questions contained in the consultation document.

3.1.1 Targets on collection

In Denmark we generate significantly more WEEE than 4 kg per inhabitant. Of this, refrigeration equipment accounts for a very large part – while this category is significantly less harmful to the environment than other product categories.

Collection targets based on consumption should be based on a study of the difference between consumption and waste generation in a given year. Consumption is expected to cover more (and maybe more complex) products than products discarded in the same year. Also, new products may have lower weight than older products discarded.

Furthermore, the ever increasing amounts of small electronic equipment present a special problem: they have a higher environmental weight, but are in practice more difficult to collect and more expensive when it comes to treatment. In Denmark it is now considered to collect small electronic equipment together with batteries, a scheme which has already been tested in some municipalities.

waste denmark recommends:

- variable binding collection targets in % of consumption in each country – divided into waste from households and waste from businesses, distinguishing between the different schemes for the two types. However, with a survey of the correlation between consumption and waste generation.

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- weighing of targets for the concrete waste streams, giving the environmentally most harmful products more weight than today.

3.1.2 Targets for recovery, component, material and substance reuse and recycling

waste denmark recommends:

- introducing a target for medical devices

3.1.3. Targets for reuse of whole appliances

In Denmark we see vivid interest in collecting WEEE in view of export to developing countries – with the argumentation that these products are for reuse. This may be true, but it entails a risk of heavy and contaminating waste generation in the countries of destination.

It will be difficult to reach profitability in the repair of EEE based on European salaries, when new EEE from developing countries is significantly cheaper.

By contrast, reuse targets for concrete product components, materials or substances may support eco-design. It is a precondition that surveys are made to identify where this is possible and where there is no risk of maintaining hazardous components or substances in the material loop, just because components may be reused.

waste denmark recommends:

- only targets for reuse where there is no risk that EEE ends up in developing countries due to exports for reuse.
- inclusion of reuse targets for components, materials or substances in WEEE – whenever possible.

3.2.1 Options for clarification of the scope

Criteria for inclusion of waste from households should first and foremost be comprehensible to the householders who are to separate and deliver their waste as WEEE.

Lists of products are not a suitable means since new products are constantly being developed. Also criteria and environmental rules may be difficult to understand for the ordinary householder.

waste denmark recommends:

- clearer definitions of categories of equipment under the scope – which may be different for consumer equipment and business equipment

3.2.2. Options on the width of the scope

The key issue is – as mentioned above – to ensure clear definitions of equipment categories under the scope. Subsequently it may be decided whether or not to include more or less products.

3.3 The operation of the producer responsibility provisions

It is very difficult to implement producer responsibility for waste from households for such a diverse product category with many producers and importers.

In Denmark, local authorities were in charge of WEEE collection in the past together with all other waste from households. Therefore, the producer responsibility scheme is based on this primary, municipal collection. But we encounter major difficulties in the implementation, under which the now five different producer organisations are to assume secondary WEEE collection (from municipal recycling centres etc.) and ensure further management.

Each year the different producer organisations are allocated collection schemes for each WEEE category, and they contract this transport assignment to private hauliers. Thus, each local authority risks having up to five different hauliers collecting different categories of WEEE – with an annual renewal of contracts.

This causes a logistically expensive collection from the municipal recycling centres and major problems in the cooperation between the local authorities and the producer organisations regarding collection equipment and routines. Also, supervision of compliance with cooperation conditions between local authorities and producer organisations is not working.

In addition, among the producer organisations there is much focus on reduction of collection costs, entailing a risk of less focus on environment friendly treatment of WEEE.

The design of producer schemes should also in the future be decided locally, while the EU regulation should focus on environmental objectives and collection targets as well as environmental and reporting requirements in collection and treatment of WEEE. Therefore *waste denmark* recommends the following in the amendment of the WEEE Directive:

- More specific requirements for producer organisations regarding information to authorities about environmental standards in the treatment of WEEE to ensure more focus on such environmental standards.
- definition of targets to support eco-design, whenever possible – also in other relevant Community legislation, such as RoHS.

3.4 Treatment requirements

It is natural to amend treatment requirements regularly in the light of technological developments – failing to do so it will be difficult to ensure development of environmentally better (more expensive) technologies.

Also, WEEE contains substances that should be removed entirely from the substance flow.

waste denmark recommends to focus on:

- the modification of present treatment requirements in line with technological developments – and preferably inclusion of reference to exceptions laid down in the RoHS Directive to ensure removal of the dangerous substances contained in products which today fall outside the scope.