

13 September 2010

HOUSEHOLD COLLECTION: MAINTAIN EXISTING SYSTEMS AND MEMBER STATE FLEXIBILITY

1- BACKGROUND

The European Commission proposed that producers should be encouraged to finance the costs of household collection and awareness campaigns on top of the existing responsibility of financing the collection and treatment from the collection facilities. The European Parliament recently passed Amendment 47 in the Environment Committee consolidated report which suggested a shared model of additional financing by retailers, consumers and producers raised either directly or through a collection levy at the moment of sale. This paper summarises DIGITALEUROPE'S reasons for strongly opposing Amendment 47, the practical difficulties of the proposal, and recommends returning to the original text in the current directive as proposed by the Rapporteur in Amendment 27 in his original report.

2- COLLECTION RESPONSIBILITIES

Expanding producer responsibilities to household collection is asking producers to sign a 'blank cheque'. The proposal by the Commission to have producers finance the costs of collection of B2C WEEE and associated awareness campaigns would enable municipalities and other actors to set costs for collection activities without control or limit. The economic impact of this is therefore likely to become unlimited. It is not appropriate for municipalities to have such a position. It should also be noted that there could be a temptation to raise funds for collection and awareness campaigns for other waste streams, which could lead to cross subsidising of those streams by EEE producers. **As per today municipalities have been unable to provide any estimates on the costs of collection** accounting for the profits that municipalities make from the sale of WEEE to commercial collectors. It is therefore highly possible that charges for household-near collection, including awareness campaigns either directly or via establishing a collection levy, could be based on arbitrary estimates rather than the real costs of collection.

Municipalities are collecting WEEE without additional funding already. Municipalities are already collecting WEEE and this is being financed through well established local systems, including the selling of valuable portions of the WEEE stream. This puts in doubt whether an additional funding is needed at all.

Achieving higher collection rates are often misleadingly linked to raising additional financial resources but such rates are best achieved through an ambitious collection target and the full reporting of all WEEE flows. As highlighted by the Rapporteur

expanding producer responsibilities to include financing household collection is not a way to improve collection rates. A report from the Netherlands showed that from a total of 18.5 Kg of WEEE that is generated per inhabitant per year, 14.8 kg (80%) is recycled, with 5.7kg (31%) being recycled by the producer funded WEEE systems. The starting point of ensuring high levels of WEEE collection should be that the collection rate is based on measuring all WEEE flows and ensuring that all WEEE is properly treated as has been suggested by the Environment Committee in their consolidated report (Amendment 4 & 29)

The European Commission acknowledged in the original WEEE Directive proposal in 2000 that producers should not be made responsible for household collection. The Commission states 'there is no evidence that attributing the collection of WEEE from private households to producers would have an impact on the design of the equipment'. EU Parliament rapporteur Karl Heinz Florenz repeated this point in his report and proposed amendments.

3- RECOMMENDATION FOR FINANCING HOUSEHOLD COLLECTION

The establishment of the system to manage household collection should be determined by each Member State. Member States have well established systems for household collection in place, including the related financing. Member States should continue to have the freedom and flexibility to choose the best way to manage household collection. If Member States feel they need additional measures to increase collection (e.g. awareness campaigns) which are outside the operational control of the producers, they should do so through their traditional tools of fund raising.

Higher collection rates are not necessarily dependent on additional financial resources being raised, they are best achieved through an ambitious collection target and full reporting of all WEEE flows. There are many actors who collect WEEE from households for commercial reasons. Extending the responsibility to report and properly treat WEEE also to these actors has the potential to improve collection rates dramatically without any need for additional measures such as financing.

Conclusion: Amendment 27 proposed by the Rapporteur in his original report should be adopted

Article 12

a. Financing in respect of WEEE from private households

1. Member States shall ensure producers provide at least for the financing of the collection, treatment, recovery and environmentally sound disposal of WEEE from private households deposited at collection facilities set up under Article 5(2).

ABOUT DIGITALEUROPE

DIGITALEUROPE is the voice of the European digital economy including information and communication technologies and consumer electronics. DIGITALEUROPE is dedicated to improving the business environment for the European digital technology industry and to promoting our sector's contribution to economic growth and social progress in the European Union.

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ABOUT JBCE

The Japan Business Council in Europe was established in 1999 as the representative organization of Japanese companies operating in the European Union. Our membership consists of more than 60 leading multinational corporations that are active across a wide range of sectors, including electronics, automotive, and chemical manufacturing. The key goal of JBCE is to contribute to EU public policy in a positive and constructive way. In doing this, we can draw upon the expertise and experience of our member companies.