



POSITION PAPER COLLECTION CRITERIA

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SUMMARY

The NVMP Association advocates establishing an objective for collection of e-waste expressed as a percentage of the actual quantity of waste electrical and electronic equipment and energy saving lamps generated ('WEEE Generated'). This is more in keeping with the objective – the responsible processing of e-waste – and has fewer practical drawbacks than the alternative, an objective based on the quantity of appliances put on the market ('POM').

The NVMP Association also believes that the criterion can only be utilised under three strict conditions:

- *the member state is responsible for control and monitoring of the objective*
- *collective responsibility*
- *all e-waste must be measured under the criterion 'WEEE Generated'*

The European Commission, Council and Parliament reached an agreement on 20 December 2011 concerning the revision of the WEEE Directive. Four years after the revised directive comes into force, a collection objective of 45% (65% after seven years) will go into effect for new electrical and electronic equipment (EEE) put on the market ('POM') or 85% of the collected e-waste (WEEE Generated) in a member state.

Preference for WEEE Generated

Both WEEE Generated and Put On Market present a challenge in terms of calculating the underlying figures. For Put On Market, manufacturers' sales figures must be corrected for import, export, returns, etc. For WEEE Generated, research must be conducted into the actual quantities of waste equipment and lamps generated.

The criterion Put On Market also suffers the disadvantage that it does not correspond to the dynamic of the e-waste that is generated. Large deviations can occur as a result of:

- rise or decline in economic activity, which results in a corresponding large rise or fall in sales, without a proportional swing in the disposal of equipment and energy saving lamps
- reduction of the service life because consumers dispose of goods earlier, perhaps as a result of technical advances – this, too, results in an increase in the amount of e-waste while sales remain stable
- new products, such as the LED lamp, which are put on the market now, but will not be disposed of for a very long time due to their extremely long service life, and thus the POM criterion presents the collection system with an impossible task

The WEEE Generated criterion perfectly matches the objective: the responsible processing of e-waste. For this reason, the NVMP Association is a proponent of this criterion.

Strict conditions

Utilisation of the WEEE Generated criterion for the collection objectives can only be successful under strict conditions:

- The member states must be given the responsibility for monitoring and control of whether the objective has been achieved. Only a member state is in a position to monitor both the activities of recognised collection systems and those of other actors. The actors themselves are incapable of monitoring one another, in part due to a lack of resources and legal remedies.
- Manufacturers and importers of electrical and electronic equipment are responsible for managing those products in the waste phase. To this end, the manufacturers or importers must individually or collectively establish a collection and processing structure. The manufacturer or importer must submit a declaration documenting the collection and processing of the electrical and electronic equipment in the waste phase to the government (the responsible authority in the Netherlands is Agentschap NL). If the member state issues an individual permit to a manufacturer, a clear-cut clearing mechanism must be established between the systems and manufacturers based on their market share. This is necessary to guarantee fair competitive conditions and prevent 'free ride' practices.
- An objective based on WEEE Generated can only be successful if it includes all e-waste and if all discarded equipment is processed in accordance with the rules (this includes collection objectives and the processing methodology).

Put simply, placing responsibility on manufacturers works, but the approach has limits.

Supplement to WEEE Directive

The manufacturers suggest a methodology for the determination of WEEE Generated. Data can be obtained from:

- Regulation 2150/2002 (Waste Statistics)
- Directive 2008/98/EC (Waste)
- Regulation 1013/2006 (Waste Shipment)

United Nations University has conducted a study for the NVMP Association into the complementary waste streams for e-waste in the Netherlands. The study, 'The Future Flows', was completed in 2012.



About the NVMP Association

The NVMP Association was established in 1999 and represents 1500 manufacturers and importers of electrical equipment and low-energy lighting in the Netherlands. These manufacturers and importers have established the first national system in the world for the responsible collection and sustainable processing of electrical appliances and low-energy lighting. The implementation thereof has been entrusted to the non-profit organisation Wecycle.

For more information

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