VERENIGING NVMP

POSITION PAPER
COLLECTION OBJECTIVES

SUMMARY

The NVMP Association wishes to step up the processing of e-waste. The manufacturers want to meet the objective formulated in Brussels which specifies that 80 to 85% of all the waste equipment and low-energy lamps should be recycled. This will only be possible if:

- ***a mandatory delivery regulation is implemented for collectors or, if this is not done, registration becomes mandatory for all commercial processors of ewaste***
- ***export of waste electronics to countries outside Europe is forbidden***
- ***efforts to prevent the disposal of small devices and low-energy lamps as residual waste is intensified***

The European Commission, Council and Parliament reached an agreement on 20 December 2011 concerning the revision of the WEEE Directive. That Directive lays down the framework for the responsible and controlled processing of waste electrical and electronic equipment and low-energy lamps ('e-waste') to prevent environmental damage and recover scarce raw materials.
The current Directive, which is established in Dutch legislation, establishes the standard that every country must collect at least 4 kg per person per year via the monitored national collection system. In the Netherlands, collection systems such as Wecycle and ICT~Milieu easily achieved this level in 2011 with 7.5 kg per person.
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.

Recent research shows that every resident of the Netherlands discards an average of 23.8 kg of e-waste per year.[1] In 2011 the national collection systems Wecycle and ICT~Milieu processed 7.5 kg (31.5%) of this waste. Another 6.4 kg finds its way to final processing of a useful nature via the scrap trade and other 'complementary streams' yet is not monitored in compliance with the legal requirements and is therefore not counted toward meeting the objective. This mainly concerns the equipment that is disposed of via charity shops and installers or which is processed by the commercial scrap trade. Each year 1.9 kg, mostly small electric appliances, is disposed of as general waste. Researchers are unable to trace the remaining weight, which includes e-waste that is exported illegally to developing countries.

IDENTIFIED E-WASTE, BROKEN DOWN BY COLLECTION CATEGORY

POM 2010	:	26,7 kg
WEEE 2010	:	23,8 kg
Identified	:	18,2 kg

FORMAL STREAMS

Wecycle/ICTM	:	7,5 kg

COMPLEMENTARY STREAMS FOR RECYCLING (TOTAL 6,4 KG)

Public collection points	:	1,2 kg (→ mandatory delivery)
B2B	:	2,7 kg
Local recyclers	:	2,5 kg (→ mandatory registration)

NOT RECYCLED

Export	:	1,9 kg (→ export embargo)
Incineration	:	2,5 kg
Not identified	:	5,6 kg

TOTAL: 23,8 KG

Source: United Nations University: The Future Flows Study into complementary waste streams for e-waste in the Netherlands, 2012

Intensification of controlled processing

Collection and recycling via the national system organised by Wecycle is growing rapidly. In 2010, the collected volume grew by more than 25%, and in 2011 by 3%. But that is still insufficient to meet the new objectives. The NVMP Association proposes the following measures to intensify the controlled processing:

1. Implementation of a **mandatory delivery regulation**, which is to say that municipalities, retailers and other parties that collect e-waste must turn it over to the manufacturers' collection system. Wecycle established an agreement concerning e-waste with virtually all municipalities in 2011, yet research has shown that despite this fact many municipalities still dispose of e-waste via other channels that provide no guarantee of responsible processing accompanied by the associated reporting.

2. If the mandatory delivery regulation is not implemented, the NVMP Association advocates **mandatory registration**. This will allow reuse and processing by other parties, such as the scrap trade and commercial processors, to be counted toward meeting the objective. The government will obtain insight into the e-waste that passes through these 'complementary streams' and can take measures to ensure that recycling takes place in accordance with the regulations.

3. An effective **prohibition of the export** of e-waste to destinations outside the European Union, with a possible exception for tested and certified working systems. The export of discarded equipment for reuse is currently permitted, but in practice it appears that there is also a lot of unusable e-waste among the usable equipment; this is then processed in developing countries, which has a tremendous negative impact on human health and the environment.

4. The efforts to prevent the disposal of small household devices and low-energy lamps as general waste must be intensified. Wecycle has been conducting publicity campaigns and activities for years to convince consumers to submit even small e-waste for recycling. Expansion of the number of collection points and the convenience of new collection concepts will make it easier for consumers to do so.

[1] *United Nations University: The Future Flows*
Study into complementary waste streams for e-waste in the Netherlands, 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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