

Statement

In anticipation of the entry into force of the new WEEE Regulations (e-waste legislation), the Brown Goods Foundation issues this statement on the necessity of maintaining a responsible system for the collection and recycling of e-waste in the Netherlands. Fully in line with the vision of the Brown Goods Foundation, the new regulations provide space for new initiatives. These initiatives, however, should be at least equivalent to that of Wecycle, since otherwise, they would undermine an optimal implementation of the producer responsibility.

The current system for the collection and recycling of discarded electronics in the Netherlands was established by the producers and importers of brown goods and white goods in 1999. To this end, both trade associations involved have established their own foundations (the White Goods Foundation and the Brown Goods Foundation) of which all producers and importers could and can become members. Together, these foundations have set up an implementing organization, which is now known as WECYCLE. Meanwhile, this non-profit implementing organization also works on behalf of other product foundations in order to implement their producer responsibility. The joint instructing foundations are members of the Dutch Foundation Disposal Metalelectro Products (NVMP) which unites some 1,600 companies.

Basic tasks

Wecycle is a so-called directing organization that does not carry out the logistical collection itself, but that selects companies to this end through tenders. The same applies to the recycling: via comprehensive tenders, Wecycle seeks the best price/quality in recyclers and then comes to agreements with them based on the expected volumes of e-waste. Especially the quality is high on the list of priorities of the instructing product foundations, since producers pursue responsible recycling based on their desire for Corporate Social Responsibility which, if necessary, (far) exceeds the statutory requirements. These statutory requirements are indeed exceeded demonstrably, while the costs associated with the recycling are in line with the market. Only at Wecycle all recyclers already meet all the new standards (WEEELABEX).

Recycling

In particular, the responsible (!) recycling of television sets is loss-making, even up to € 0.25 per kilo. (In case of white goods, especially the CFC-containing appliances, such as refrigerators and the like, lead to considerable costs). A new challenge is that of the recycling of mercury-containing flat-screen televisions that are now increasingly common in the e-waste. The responsible recycling of such products must take place in costly enclosed installations that prevent mercury from being released (and thus resulting in producer liability for any corresponding (health) damage). The policy of Association NVMP, and thus the task for Wecycle, is that any kind of irresponsible and therefore risky recycling should be avoided.

Collection

The collection of e-waste will always cost money. Wecycle has set up a nationwide collection infrastructure and seeks the logistics partners through tenders, whereby it, in addition to quality, also tries to obtain the lowest price. Part of the collection process is the sorting of the e-waste collected by the municipality and retail stores. This sorting in itself will not bring in any money, although it does have a favorable effect on the costs of recycling and improves the results of this recycling. Finally, the municipality, as the greatest collector of e-waste, requires a fee for the storage and handling of the collected appliances. Retail stores require a similar fee. These logistics expenses of the municipality and retail and the transfer to sorting centers or recyclers constitute the main part of the total costs that producers reimburse.

Revenues

Of course, there are also revenues from this recycling (in accordance with the instructions of the producers, no refurbishing or reconditioning takes place). These revenues result from the earnings from the materials. These earnings are partly determined by the prices of materials on the London Metal Exchange.

Obviously, these materials must actually be recovered in a marketable purity.

Although there are products that represent a high intrinsic value, such as washing machines (almost entirely made of steel) and computers (quality materials), other product groups will only generate little revenue (a CRT TV is mostly glass and plastic, with few valuable materials). In many cases, this is insufficient to cover the logistical costs of the responsible collection and transport.

Conclusion

For some product groups, it may be possible to achieve a break-even situation between the logistics costs and the balance of the costs and earnings of recycling. For the vast majority of the product groups, however, break-even will not be achieved, leading us to the conclusion that responsible collection and recycling will result in a deficit balance.

Of course, it does not end there.

Social duties

European legislation and national implementation of that legislation requires producers to achieve a very high collection rate by 2019. This collection rate is twice as high as the percentage we are currently realizing. For the producers to meet the targets (and they have no choice!), they will now have to give their utmost efforts to improve the collection process.

The producer organizations in the Netherlands (Association NVMP) have urged the government to count the collection and recycling by organizations other than Wecycle as responsible recycling. For this to be possible, though, the recycling must meet quality requirements. Recyclers will need to be certified, even if they are located outside the Netherlands, so that there is no chance of leaks to irresponsible waste recyclers or waste dump sites.

Especially because of this new legislation, more parties can contribute to responsible recycling, allowing us to take a large step towards the required targets.

We will also need to develop more and more effective return flows. As long as consumers continue to throw away two kilogrammes of small e-waste in the container for other waste materials every year, tens of millions of kilogrammes will disappear. The Ministry of Infrastructure and the Environment has instructed producers to keep at least 25 million kilogrammes of small appliances out of the residual waste. To this end, producers have asked Wecycle to start a public campaign that can contribute to this task. Such a campaign is obviously very expensive, but there is no alternative.

Doing nothing will not help us meet the requirement the Ministry has imposed on us.

Precisely for the purpose of improving the collection and recycling techniques, the Association NVMP (often in cooperation with Wecycle) investigates where there is still room for improvement. We are actively looking for leakage of waste flows, so that we can refute the accusation of producers dumping in Africa as well as to actually stop possible leaks.

We call communication in view of behavioral change and research social tasks. They are essential for actually giving shape to the social responsibility of all producers and in particular for the achievement of the targets by 2019.

Final conclusion

Association NVMP believes that with this, it fulfils the legal and social responsibility of producers very well. At the same time, it welcomes any initiative that fulfils this task in a similar, responsibly way, especially if it visualizes and allows for registering flows that thus far have remained undiscovered.

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