

## LARAC comments on the EU proposal for revision of the WEEE directive

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### LARAC's Comments

LARAC disagrees with paragraph 14 in the preamble:

'Data included in the impact assessment shows that 65% of electrical and electronic equipment placed on the market is already separately collected today, but more than half of this potentially leaks to improper treatment and illegal exports. This leads to losses of valuable raw materials and environmental degradation. To avoid this, it is necessary to set an ambitious collection target'. LARAC is of the opinion that the problem of a % being lost to improper treatment and illegal export should not be addressed simply by raising the collection target. This would be a waste of resources spent on collecting the WEEE. In this light, it deems that the detailed rules for the implementation of art. 10.1 and 10.2, as referred to in Art. 10.3, will be vital for the achievement of the improvements sought through the amendments.

LARAC welcomes a distinction between household and non household waste. It would however like to see separate targets for the two categories.

Regarding the amendment to par. 19 of the preamble, which states that 'Member States should encourage producers to take full ownership of the WEEE collection in particular by financing the collection of WEEE throughout the whole waste chain, including from private households... to shift payment for the collection of this waste from general tax payers to the consumers of EEE' and the corresponding Art. 12, LARAC would have preferred a clearer mandate to Member States to charge producers for the collection of WEEE. A benchmarking system or similar could be used to determine a reasonable collection cost that may be recharged to producers. It would like to see safeguards put in place to ensure the financing of such collections is stable even after collection targets are met; the public will continue to expect the service and it is appropriate that this will continue to get financed by the consumers of EEE after such time.

LARAC is concerned about the following:

Art. 3I – 'WEEE from private households' means WEEE which comes from private households and from commercial, industrial, institutional and other sources which, because of its nature and quantity, is similar to that of private households'.

Then, in Art. 5.2, it is stated that 'for WEEE from private households, systems are set up allowing final holders ... to return such waste free of charge. ' This would mean that commercial operators are able to dispose of the WEEE element of their waste for free. Given that such systems may well be set up at HWRCs, this would create a potentially confusing situation where the commercial operators are allowed to use certain provisions at the HWRC. In addition, given that collection facilities may be set up as part of a wider kerbside recycling collection, the inclusion of WEEE from commercial operators that do not receive this wider collection, may not be practicable. This may leave commercial operators without a facility to dispose of their WEEE.

LARAC welcomes the inclusion of Re-use in the targets for recovery and recycling, but wishes a clear distinction between re-use without first becoming waste (eg through reuse networks, which should not count towards targets), and reuse after the items have become waste, such as reuse of goods from LA collected WEEE