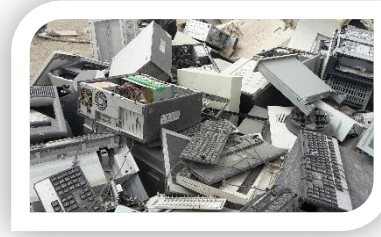


# Final workshop

## "WEEE compliance promotion exercise"



## IMPLEMENTATION OF EXTENDED PRODUCER RESPONSIBILITY

Dana Huranova, Deloitte Sustainability & Maximilian Kling, BiPRO

Brussels, 24 October 2017

European Committee of the Regions, Van Maerlant street n. 2, 1040 Bruxelles/Brussel

# Overview

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- 1. Selected criteria for Member States assessment**
- 2. Summary of the Member States assessment**
- 3. Overview of common challenges**
- 4. Presentation of good practice examples**

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# Assessment criteria – Background

## CE PACKAGE: WFD ARTICLE 8A - GENERAL REQUIREMENTS FOR EPR

1. Clear roles and responsibilities
2. Measurable waste management targets
3. Reporting system
4. Equal treatment and non-discrimination
5. Information about the available waste collection system and encourage participation
6. Clearly defined geographical, product and material coverage
7. Necessary operational and financial means
8. Self-control mechanism
9. Publicly available information

### 11. Financial contribution, which covers:

- Costs of separate collection
- Sorting and treatment
- Providing adequate information
- Costs of data gathering and reporting

### 12. Financial contribution modulated on the basis of real end-of-life costs

### 13. Financial contribution based on optimised costs of the services provided

### 14. Adequate monitoring and enforcement framework

### 15. Platform to ensure a regular dialogue

### 16. Compliance of former EPR Scheme

# Assessment criteria

## 1. Implementation of the EPR principle

1.1 Level of cost coverage by producers

1.2 Existence of approval procedures for responsible organisation(s)

1.3 Existence of obligation of audits for responsible organisation(s)

1.4 Modulation of fees based on true cost of waste management

1.5 Stakeholder cooperation

# Summary of the MS assessment

## Level of cost coverage by producers

### Collection

Partial: AT, IE, IT, MT, NL, PT, UK  
0 %: DE, DK



### Transport 100 %



### Treatment 100 %



# Summary of the MS assessment

## Existence of approval procedures for responsible organisation(s)



**No specific approval procedures for PRO**

DK, NL, PL

**Specific approval procedures for PRO exist**

HR, HU, DE, AT, BE, BG, ES, IE, LT, LU, LV, MT, PT, SE, SK, UK, CY, CZ, EE, FI, FR, IT, RO, SI, GR

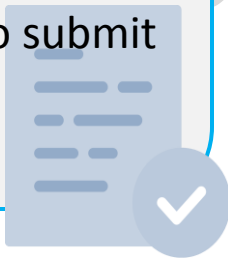
## Summary of the MS assessment

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### Example: Existence of approval procedures for responsible organisation(s)

#### Greece:

- PROs get a 6-year approval, after submitting their business plan
- PROs are obliged to submit annual reports



#### Hungary:

- Specific registration requirements for PROs (categories 5, 5a and 8) are fixed in the national Decree



# Summary of the MS assessment

## Existence of obligation of audits for responsible organisation(s)

**15 MS**

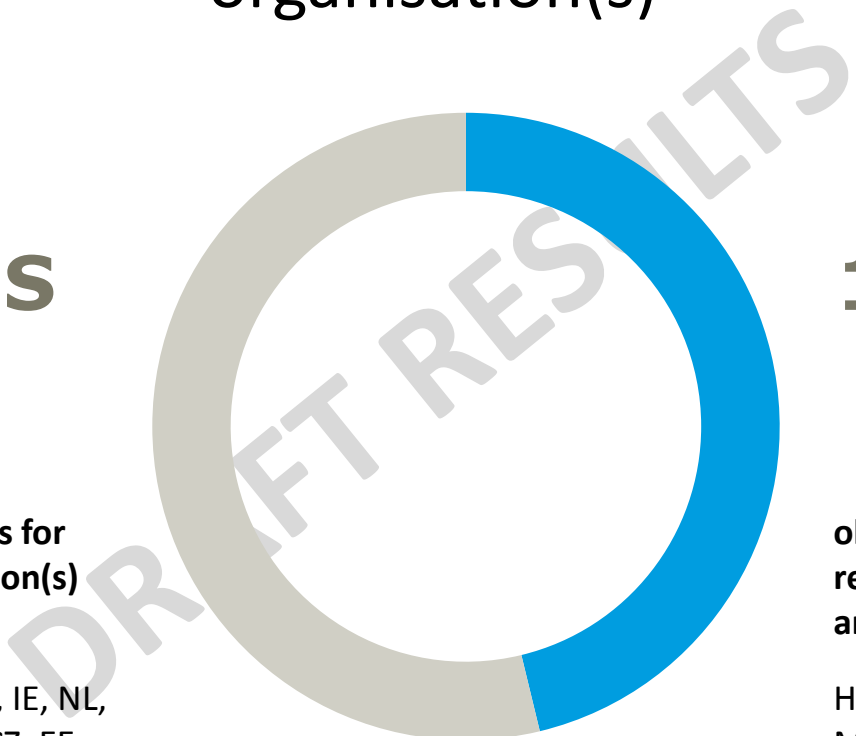
**No obligation of audits for responsible organisation(s) are in place**

GR\*, FI, HU, PL, AT, DK, IE, NL, PT, SE, SK, UK, SE, CY, CZ, EE

**13 MS**

**obligation of audits for responsible organisation(s) are in place**

HR, LU, DE, BE, BG, ES, LT, LV, MT, FR, RO, SI, IT,



\*Voluntary



## Summary of the MS assessment

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### Example: Existence of obligation of audits for responsible organisation(s)

#### Malta:

- Producers and PROs have to submit quarterly and annual reports
- Reports have to be certified and approved by certified auditors

#### Lithuania:

- PROs must provide a report on the annual financial statements and operational issues
- Report must be approved by an independent auditor

# Summary of the MS assessment

## Modulation of fees based on true cost of waste management

**22 MS**

**PRO are not obliged to apply different fees depending on true costs of waste management**

HR, CY, AT, BE, BG, DK, ES, IE, LT, LV, MT, NL, PL, PT, SE, SK, UK, CZ, EE, IT, RO, DE

**6 MS**

**PRO are obliged to apply different fees depending on true costs of waste management**

GR, LU, FI, FR, SI, HU



# Summary of the MS assessment

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## Example: Modulation of fees based on true cost of waste management

Austria (not regulated by law):

- Fees are calculated by each PRO individually based on the principle of true-cost pricing (“Kostenwahrheit”).
- Fees are calculated according to the EEE categories

France:

Fees have to be modulated based on ease of dismantling, recycling, durability, use of recycled materials, availability of spare parts and technical documentation.

# Summary of the MS assessment

## Existence of a formal stakeholders' platform to discuss EPR

22 MS

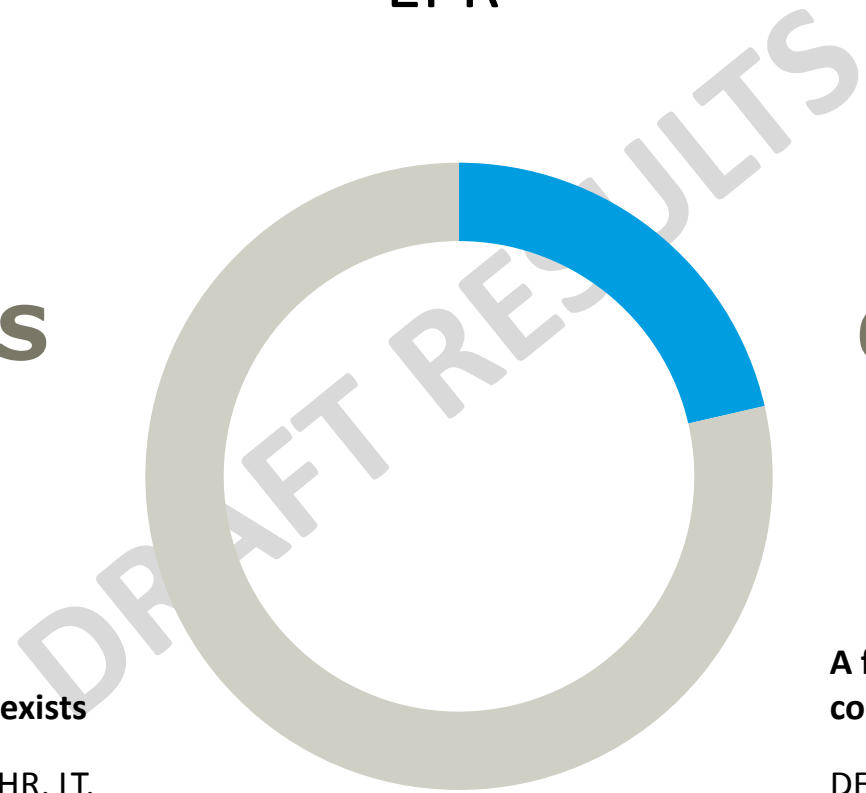
**No formal stakeholder cooperation/platform exists**

GR, HU, LV, AT, BE, BG, HR, LT, LU, MT, NL, PL, PT, SE, SK, CY, CZ, EE, IT, RO, SI, DK

6 MS

**A formal stakeholder cooperation/platform exists**

DE, ES, IE, UK, FI, FR



# Summary of the MS assessment

## Example: Existence of a formal stakeholders' platform to discuss EPR

Ireland:  
National 'WEEE and Battery Monitoring Group' chaired by the Department of Communications, Climate Action & Environment (DCCA) that provides a forum for key WEEE stakeholder matters.  
This department also chairs a 'National Stakeholder Forum' on waste management

United Kingdom:  
The Industry Council for Electronic Equipment Recycling (ICER) is a cross-industry association focusing on WEEE



Source: <http://icer.org.uk/>

# Major challenges

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## Unclear definition of roles and responsibilities

- E.g. who has to set up collection points, who is allowed to collect where, who is in charge....
- WEEE management system does not always work efficiently
- conflicts between different stakeholders



## Enforcement against “free-riding” producers

- Ensuring registration of imported products
- Inclusion of distance sellers into the system



# Good Practice Examples

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## Coordination by central authority

- Approval procedures for PROs in BG, FR, ...
- Coordination mechanism set up by the PROs in IT
- Coordination mechanism set up by the WEEE register in DE,  
...



## European WEEE Enforcement Networks

- Cooperation between almost 20 competent authorities as regards the enforcement against “free-riding” producers



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Thank you for your attention.

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