



rete clima

# Eco-modulation of fees for 'greener' products

## Concerns and challenges

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## Multi-stakeholder task force

In November 2020, in response to the 2018 Directive 2018/851/EU on Waste, the WEEE Compliance Promotion Exercise and the 2019 Commission's draft Guidelines on general minimum requirements, the WEEE Forum set up a task force. Working with individual producers and APPLiA and individual members from DIGITALEUROPE, the sector's producer associations, as well as the forty-five producer responsibility organisations (PRO) in the WEEE Forum, the objective of the task force is to proactively set the framework, principles and mechanisms for a harmonised eco-modulated fee scheme in Europe which is compatible both with existing EPR implementation and the producer community's current calls for system change as outlined in "An enhanced definition of EPR and the role of all actors", ensuring that policy initiatives are impactful and that good product design is rewarded by criteria for eco-modulation which are effective, easy to implement, fair, compatible with existing EPR systems and harmonised across Europe.

Acknowledging that eco-modulation of fees is a useful concept whilst the benefits depend a great deal on the way the scheme is put into practice, and with an open mind, the task force set out to explore which **criteria and products** can be selected for eco-modulation, how to develop a **simplified fee modulation**, how to construct the **compliance framework** for both producers and PROs, the **operational aspects of bonus/malus**, how to embed eco-modulation in a **competitive PRO landscape** and how the fee can be utilized as a tool to **influence purchasing behaviour and stimulate sustainable product design**.

Furthermore, echoing the Compliance Promotion Exercise, in designing those criteria, the task force also assessed **lessons learned in France and in the lighting sector**.

The work of the task force is on-going, and the final results will be presented later in the year. Having been through an exercise to devise a simple list of priority products, this interim paper is being submitted to the Commission to share some of the barriers and limitations we have encountered.

## Main messages

The European Commission's draft Guidelines on the "general minimum requirements for EPR schemes" set out in Directive 2018/851/EU aim to facilitate the adaptation of EPR schemes to new requirements concerning eco-modulation of fees by providing guidance to support their harmonised interpretation and application across the EU. They say: "Harmonised and effective implementation of these requirements should support level playing field and provide investment certainty, in particular, in separate collection, sorting and recycling, which will then go counter to the intended harmonisation and to increasing the effectiveness of such schemes across the Union."

In response to these Guidelines, the WEEE Forum set up the task force to proactively develop a preferred framework, principles, and mechanisms for a harmonised eco-modulated fee scheme in Europe and to assess its economic impact. Further work is on-going, and the full results will be released in a final report towards the end of 2021.

The interim findings of our research are as follows:

- **Considering a range of products that account for four-fifths of sales and three-quarters of the waste generated, there is very little room to reduce technical treatment costs through treating 'greener' products. Even for those products that have more room to reduce technical treatment costs, the incidence is**

*below €3 per product. There are huge limitations to delivering product or consumer change through eco-modulation.*

- Modulating compliance treatment fees, which represent less than 2% of the individual product price value, is very limited as an effective instrument to drive consumer behaviour towards ‘greener’ products.*
- Consumers consider a range of factors when comparing between products to purchase. Where a visible fee is already payable, it does not seem to influence purchasing behaviour. Moreover, consumers have a perception that green products are more expensive, but implementation of eco-modulation should lead to a lower product price. How product price influences consumer behaviour is complex and understanding it requires more research.*
- Eco-modulation has been in operation in France for ten years. It is not possible to ascertain the impact of the eco-modulation scheme on manufacturers’ decisions to make their products ‘greener’. Producers also report that the scheme is over-complicated. This gives weight to the need for simplicity and harmonization to derive impact; the scheme must be improved.*
- If countries in Europe decide to roll out eco-modulation schemes, measures must be taken to ensure that there is harmonization across the EU.*
- The Sustainable Products Initiative (SPI) aims to make ecodesign principles deliver on sustainability, including circularity. The SPI aims to further develop ecodesign requirements on material efficiency aspects: durability, reliability, reparability, upgradability, recyclability, hazardous substance, recycled content and design for disassembly. These elements are similar to the criteria set by Article 8a(4)(b) of the Waste Framework Directive aiming at creating incentives for manufacturers to design greener products for mitigating the environmental impacts. The Commission believes that eco-modulation will supplement the SPI, but the concern is that it may give rise to inconsistencies or confusion instead. Hence, there are a number of safeguards that the Commission must put in place to harmonise eco-modulation and avoid too many disparate schemes. Criteria on reparability, durability, recyclability, and reusability are already addressed by the current Ecodesign Directive, with new resource efficiency requirements related to the reparability and recyclability of several products entered into force in March 2021.*
- The guiding principles for the EU and the Member States should be harmonisation, progressivity, simplicity, limited scope, and additionality.*

## Setting the scene

Directive 2018/851/EU amending Directive 2008/98/EC on waste introduced in 2018 for the first time general minimum requirements for Extended Producer Responsibility (EPR) schemes, which seek to “introduce a level of harmonisation to improve the transparency, governance and cost-efficiency for all existing EU level and national level EPR schemes of which there are more than one hundred in the EU.

Article 8a (4) of Directive 2018/851/EU (see Annex I) on Waste says:

*“Member States shall take the necessary measures to ensure that the financial contributions paid by the producer of the product to comply with its extended producer responsibility obligations: [...]. In the case of collective fulfilment of extended producer responsibility obligations, are modulated, where possible, for individual products or groups of similar products, notably by taking into account their durability, reparability, re-usability and recyclability and the presence of hazardous substances, thereby taking a life-cycle approach and aligned with the requirements set by relevant Union law, and where available, based on harmonised criteria in order to ensure a smooth functioning of the internal market”. [...]*

Importantly, Article 8a (4) indent (c) says that those financial contributions should not:

*“[...] exceed the costs that are necessary to provide waste management services in a cost-efficient way. Such costs shall be established in a transparent way between the actors concerned.”*

The Member States of the EU are transposing this Directive into national law and schemes should be in place by 2023.

However, in parallel to the transposition of that Directive, the European Commission has also been preparing a legislative Sustainable Product Initiative (SPI), which it will issue towards the end of 2021. The SPI will seek to ensure that all products placed on the single market become increasingly sustainable and stand the test of circularity. The SPI is set to revise the Ecodesign legislation and design sustainability requirements on a range of products. Upgradable, repairable, reusable, and recyclable products must become the norm.

The associations representative of household appliance manufacturers, WEEE and WEEE lighting producer responsibility organisations (PRO) and information, communications and consumer electronics technology industries and digitally transforming industries support the objectives of these laws and initiatives. **However, the application across many policy areas must be clear and consistent across Europe to create the intended impact of sustainable circular business models and opportunities from a product lifecycle perspective. These conditions are currently not in place.**

The European Commission wrote in its 2018 final report on the “WEEE compliance promotion exercise” that “proper implementation, application and enforcement of EU waste legislation are among the key priorities of EU environmental legislation and policy” and that in their support, “the European Commission [...] has carried out, compliance promotion initiatives to assist Member States with the implementation of EU waste legislation.”

And also:

*“The European Commission when preparing guidelines on modulation of fees should take into consideration information and experience from Member States already implementing modulated fees. The Commission should also consider adopting implementing acts in order to lay down criteria for the modulation of fees at European level. To this end, it should identify conditions of success and points of attention from Member States implementing modulated fees and notably looking at the products for which the modulation should be set as a priority and is feasible, bearing in mind that modulation should provide a sufficient incentive to influence design of the products to improve product reuse and*

*recyclability and also looking how to ensure that criteria are clear and based on lifecycle approach, easily provable and feasible also in terms of their administration.”*

In other words, the Commission is expected to be the guardian of the Treaties and, specifically, of proper implementation of the EPR guidelines.

Accordingly, the Commission issued a draft set of Guidelines on the “general minimum requirements for EPR schemes” set out in Directive 2018/851/EU. The Guidelines’ aim is:

*“[...] to facilitate the adaptation of EPR schemes to these new requirements by providing guidance to support their harmonised interpretation and application across the EU. Harmonised and effective implementation of these requirements should support level playing field and provide investment certainty, in particular, in separate collection, sorting and recycling, which will then go counter to the intended harmonisation and to increasing the effectiveness of such schemes across the Union.”*

## Economic assessment

As a first step, the task force commissioned Sofies, an international sustainability project management and consulting firm, to conduct a study on the technical and economic scope for eco-modulation, which would support the task force in defining potential products for eco-modulation and criteria for ranking products for eco-modulation.

Crucially, ***against the background that Directive 2018/851/EU on Waste requires that the total financial contributions should “not exceed the costs that are necessary to provide waste management services in a cost-efficient way”***, the Sofies study says:

- Considering the 15 most relevant products that account for 81% of placed on the market (POM) in 2018 and 73% of the waste generated, there is very little room to reduce technical treatment costs through treating ‘greener’ products. Even for those products having more room to reduce technical treatment costs, the incidence is below €3 per product. The fact that the Waste Framework Directive requires that the total fees should “not exceed the costs that are necessary to provide waste management services in a cost-efficient way” means that the size of the modulation of the fee will necessarily be limited.
- The variance observed on compliance fees at product level across the EU is mainly related to the return rate of products and internal cross-financing or commercial strategies, and only partly to differences in recycling costs. For example, fees for dryers vary from €0.49 per unit to €7.96 per unit – the different types of dryers (condenser, heat pump and exhaust air dryers) and corresponding differences in costs of collection and treatment explain this variance.
- PROs are expecting overall costs (and therefore fees) to increase due to extra measures to meet ambitious collection targets. So the fee for all products may go up and the fee of a ‘green’ product may go up too, albeit less so in relative terms. The end result is, however, that eco-modulation has not resulted in a lower fee for the ‘green’ product.
- When considering the potential for cost reduction, the corresponding modulation will be insufficient to change consumer choice. Assuming that the impacts on consumer behaviour can be measured according to the impact of the compliance fee on product price, most of the products considered have a compliance fee below 1% of their respective product price. Therefore, fee modulation will not be an effective tool for changing consumer behaviour.
- There is limited conclusive evidence or data, representative of consumers in Europe, with which to assess how much consumers will be willing to pay to keep a product in

use via repair or maintenance (or because of increased durability) and support the waste reduction concept.

- Unsurprisingly, there may be a reduction in waste generated as a result of product lifetime extension, but this will be as a result of lower sales. This can be seen for washing machines, where the estimated 8% reduction in waste generated in 2030 is linked to 10.5% reduction in sales. The same pattern is seen in refrigerators (6.9% reduction in waste generated linked to 11.5% reduction in sales) and TVs (8.7% reduction in waste generated linked to 13.5% reduction in sales). Where less products are being put on the market, PROs will be distributing their (fixed) costs on a smaller number of products, which means the fees per product are unlikely to decrease, leading to very little cost incentive.
- Labour is one of the main cost items in responsible repair activities, representing 33% of total costs of repair for small appliances, 44% for large appliances and 30% for cooling devices. A modulated fee will not affect those labour costs.
- Increase of Stock Keeping Units might also have a cost which goes beyond the effects of eco-modulation.
- The costs of historical products will also affect the 'green' producers. Even though 'green' producers will pay less financial contributions than 'black' producers, there is no simple mechanism to ensure that 'green' producers only pay for the costs of the management of their own products.

Furthermore, there are limits to further product improvements for some product categories, compared to, say, ten or twenty or more years ago. CFC, HFC and HCFC, ozone depleting substances or gases with a global warming potential >15 have been banned, certain hazardous substances, such as mercury, cadmium, and hexavalent chromium, are restricted in new products. Today's cooling appliances are substantially more energy efficient than those marketed just ten years ago. In other words, the scope for further technical improvements is limited, in many cases, certainly compared to more than twenty years ago. A fee that therefore does not spur innovation will rightly be perceived as an unwarranted tax.

In summary, ***the technical scope for modulation is relatively limited and the size of modulation is such that neither producer nor consumer behaviour is likely to be affected.***

See Annex II for a copy of the study.

But what about consumers? What is their attitude vis-à-vis fees that reflect the environmental credentials of products?

## The consumer perspective

WEEE Ireland and SENS eRecycling, leading PROs in Ireland and Switzerland, have both undertaken preliminary qualitative surveys to understand consumer attitude vis-à-vis visible fees on products. There is further work on-going to identify and synthesize available literature on this topic.

Key takeaways from the Irish survey:

- Visible fees are seen as a reassurance that their old appliance will be disposed of properly. However, the fees need to stay embedded in the overall price, otherwise they could be perceived as a tax or levy.
- Introducing different fees among products is seen to be confusing although they could potentially be used among large/small appliance categories.

- As consumer values evolve, responses from manufacturers will evolve too. It is within this context that the role of visible fees can be shaped as a tool for the future.

Key takeaways from the Swiss survey:

- The key components of consumer behaviour are practical factors such as suitability, dimensions, functions, as well as energy efficiency (label), brand and design. Price is of least concern.
- Consumer expectation is that more sustainable products are generally more expensive. If this finding is applicable to consumers more widely, then if and how modulated fees are communicated or reflected in product prices, requires detailed analysis.
- The Advanced Recycling Fee is seen as irrelevant for the purchase decision because it is not significant.
- Consumers have a strong desire for a label that provides an evaluation of sustainability, for example in the form of a traffic light system.

This limited understanding of how price changes affect consumer behaviour demonstrates the challenges of using eco-modulated fees to drive consumer behaviour. WEEE Ireland and SENS eRecycling are going to work on a more in-depth comparison of survey results to highlight similarities and differences but more research is required to understand if eco-modulation is effective in changing consumer behaviour, and in determining how best to present information to consumers to allow them to differentiate between products.

See Annex III for a copy of the results of the surveys.

The experience in France with visible fees echoes these takeaways. The visible fee on domestic appliances was permanently written into French law in February 2020.

## Lessons learned from France

In 2010, France was the first country in Europe to design and implement an eco-modulation scheme for electrical and electronic equipment, starting off with six product types and in 2015 extending it. Eco-modulation principles are defined in the law and five EPR schemes decided to implement it: packaging, graphic paper, textile, furniture and EEE.

After more than ten years' experience with the eco-modulation scheme, ecosystem and Ecologic, the two main PROs in France, on behalf of OCAD3E, the accredited WEEE co-ordination body, assessed the eco-modulation scheme:

*“[...] after three full years of declaration, the study reveals certain limits to clearly identifying the levers and factors affecting the evolution of the number of products declared as eco-modulated per product family (declarative practices, design practices and/or market share of the different products, etc.”*

And also:

*“Companies do not explicitly quantify the costs of changing the design or business practices for products that benefit from a bonus or avoid a malus within the eco-modulation system. In fact, changes may be the result of concomitant factors (as explained in the previous chapter: consumer/distributor demands, regulations, etc.) and may not be specific to eco-modulation, which makes precise costing difficult.”*

Based on the experience and the study, they made five suggestions to improve the framework:

1. Eco-modulation criteria need to be SMART (specific, measurable, achievable, realistic and timely), stable over time and verifiable.
2. Criteria need to be focused on where they can have an impact on reparability, durability, recyclability and circularity.
3. The framework needs to be as simple as possible in terms of definition of criteria, declaration process and means to provide evidence, otherwise companies will choose to ignore eco-modulation or just pay the extra fee.
4. The more countries that adopt a harmonised eco-modulation framework, the more business will develop products with reduced environmental impacts.
5. Criteria need to be consistent from one country to another and across countries for producers to respond (because products are designed for international markets)

***The effect of an eco-modulation scheme on manufacturers' decision to make their products 'greener' cannot be ascertained, and there is a tendency among decision-makers to overcomplicate the scheme. If countries in Europe decide to roll out eco-modulation schemes, measures must be taken to ensure that the French recommendations are heeded. After ten years of an operational eco-modulation scheme, the limitations of eco-modulation are clear. However, the French also believe that the scheme can be further improved.***

It should be noted that, in contrast with EU law, French law allows the total financial contributions to exceed waste management costs: *“Les primes et pénalités peuvent être supérieures au montant de la contribution financière nécessaire à la gestion des déchets [...]”*.

Annex IV offers an assessment of the French scheme.

## Lessons learned in the lighting sector

The findings of our study are also supported by a comprehensive analysis undertaken in the lighting sector by Eucolight, the European association of lighting WEEE compliance schemes. That analysis (attached as Annex VI) reviewed the data from 10 EU Member States across three years. It assessed the actual impact of modulated fees on the change in market share of certain lighting products. The fee modulation was largely for commercial reasons, but nevertheless, the potential impact on changes to producer and/or consumer purchasing, would have had the same impact as eco-modulated fees.

The study concluded that there was zero correlation between fee modulation and change in market share. In other words, the Eucolight study fully supports the conclusion reached by Sofies, that producer or consumer behaviour are unlikely to be affected by eco-modulation.

## Fundamental principles

Mindful that there is a serious risk that eco-modulation will end up having little impact on the eco-design of products yet giving rise to high administration and compliance costs, the European sector of producers of electrical and electronic equipment issued a commentary in 2019 titled “Joint industry comments on modulating producers' financial contributions for WEEE” (see Annex V).

The paper laid down a set of fundamental principles.

1. Fees must cover real costs for end-of-life waste management and through modulation provide true incentives for producers.
2. Criteria underpinning the modulation of fees must be harmonised at EU level and must be coherent with existing EU legislation and related European and international standards. To avoid distortion of the internal market, the sector requested the European Commission to adopt legally binding criteria to ensure the uniform application of the eco-modulation of fees throughout Europe (but excluding any precise determination of the level of the fees), to take all necessary measures to discourage Member States to put in place modulated fee schemes, which deviate from a harmonised EU framework and from setting up new modulated fee schemes until a harmonised EU framework is in place and to put in place measures to enforce the modulated fee schemes all over Europe given that free-riding in the current EPR system is already heavily distorting the internal market.
3. As the implementation of modulated fees on all WEEE would be extremely challenging, the EU framework and eco-modulation schemes must start simple, i.e. cover only a few easy-to-understand criteria and only a few types of products or product categories.
4. The modulated fee criteria should be simple, verifiable and enforceable as well as enforced.
5. Measures must be taken to counter misuse of modulated fees by (online) free-riders.
6. Existing EPR schemes for WEEE in the Member States and financing obligations of producers must be preserved.
7. The total sum of fees, i.e. the total set of regular fees as well as bonus and malus fees, must not exceed the necessary costs requirement of Article 8(a) of Directive 2018/851.
8. Modulated fee criteria must be defined in close consultation with the relevant stakeholders, and, in particular, with producers.
9. Modulated fees criteria must be sufficiently flexible and updated periodically to reflect technological progress.
10. There should be sufficient implementation time for producers to adapt their processes and particularly the design of the products.
11. We strongly recommend the European Commission to conduct a thorough impact assessment of the eco-modulation concept, criteria, environmental impacts, financial consequences, existing modulated fees schemes in Europe.
12. The “real” end-of-life costs and the “recyclability” of a specific product can only be determined years after the product has been placed on the market.

## Sustainable Products Initiative

The ink of Directive 2018/851/EU on Waste with its suggestion that fees for individual products or groups of similar products are modulated, notably by taking into account their durability, reparability, re-usability and recyclability and the presence of hazardous substances, was barely dry, before the Commission announced a legislative initiative “to make products fit for a climate neutral, resource efficient and circular economy, reduce waste and ensure that the performance of frontrunners in sustainability progressively becomes the norm”: the Sustainable Products Initiative.

As a legislative proposal, the SPI has the intention to widen the scope of the Ecodesign Directive beyond energy-related products to make it applicable to the broadest possible range of products (including services where appropriate) and make it deliver on

sustainability, including circularity. This may be complemented by other legislative proposals and other (non-legislative) actions if necessary. The SPI may also establish product sustainability principles and other ways to regulate sustainability-related aspects in a wide range of products. The SPI aims to further develop ecodesign requirements on material efficiency aspects: durability, reliability, reparability, upgradability, recyclability, hazardous substance, recycled content and design for disassembly. These elements are similar to the criteria set by Article 8a(4)(b) of Directive 851/2018/EU on Waste, aiming at creating incentives for manufacturers to design greener products for mitigating the environmental impacts.

Eco-modulation of fees is a financial instrument to make product design more sustainable through the use of criteria, which, logically, have to go beyond legally mandatory requirements. The thing is that, in parallel to the implementation of eco-modulated fees, the SPI is being developed, which is expected to introduce new, stricter legal requirements for sustainable product design, addressing many of the same areas as eco-modulated fees. However, the expected new requirements of the SPI are already quite far-reaching and will require significant investments by producers. Therefore, the question arises to what extent modulated fees will succeed in incentivizing producers enough to fulfil more demanding criteria than legally required, whilst considering the constraint that the total financial contributions should “not exceed the costs that are necessary to provide waste management services in a cost-efficient way”, creating limited scope for fee modulation.

***Modulated fees will unlikely create a financial incentive that is high enough to promote additional investments in sustainable product design. We recommend assessing a different set of regulatory instruments and to focus on one instead of various, possibly overlapping instruments. SPI, for example, is a more appropriate and more effective legal tool to foster green products than eco-modulation.***

## Conclusion

On the one hand, industry is supposed to work on a broad scope, encompassing durability, reparability, re-usability and recyclability and the presence of hazardous substances, thereby taking a life-cycle approach, whilst, on the other hand, respecting a severe constraint, c.q. that the total financial contributions should not exceed the costs that are necessary to provide waste management services in a cost-efficient way. Some schemes have a broad scope, yet EPR costs exceed full net costs – in France, modulation of the fee can go up to 20% of the selling price.

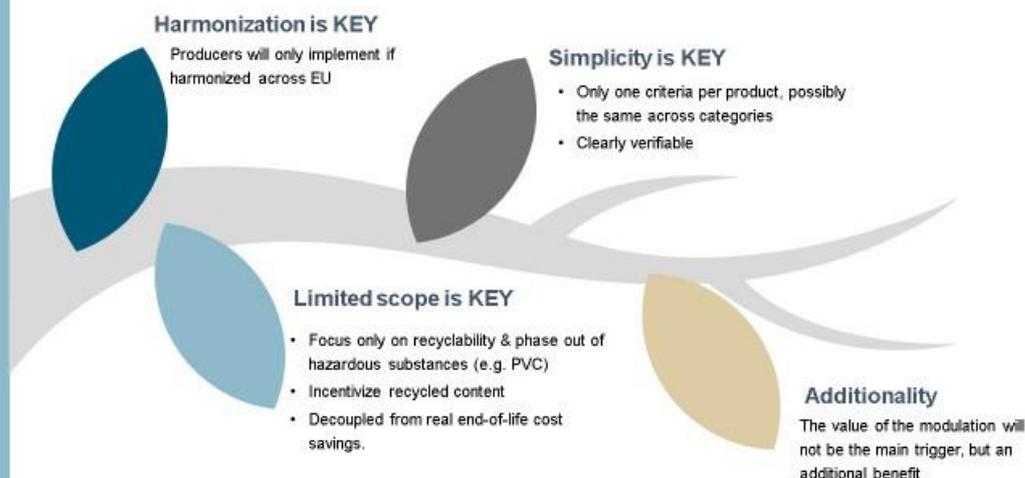
***This paper argues that it is inherently impossible to have a wide, comprehensive, and ambitious scheme where EPR costs remain below net costs and yet has a discernible effect on consumer and producer behaviour.***

This is a conundrum which we believe policymakers should ponder and resolve.

Furthermore, in advance of the Sustainable Products Initiative and the Member States transposition of Directive 2018/851/EU and implementation of the Guidelines, the task force is seeking a response to the following fundamental questions:

- What will the Commission do to make sure that SPI can be used as a more effective lever to implement design change? What will they do to avoid an overlap of incentives or, worse, contradictions between SPI and Directive 2018/851/EU?
- In response to its own promises, what is the European Commission going to do to safeguard Member States' alignment with the Guidelines that guarantee a harmonised, simple, gradual, timed, EU-wide scheme around a few products, as well as “uniform action” and application?
- Will the Guidelines be further developed to take account of our findings and the need to simplify and limit the scope?
- It has been suggested that an Implementing Act will be introduced down the line. Would that not duplicate effort and waste time? Too many systems will already be underway.

### Is there political and operational room to implement Eco-modulation?



## Annexes

### Annex I | Article 8a (4) of Directive 2018/851/EU on Waste

Excerpt of Directive 2018/851/EU

### Annex II | Economic assessment

Slides of the Sofies study

### Annex III | The consumers' perspective

Slides of the survey in Switzerland and Ireland

### Annex IV | Assessment of the French scheme

OCAD3E report

### Annex V | Fundamental principles

Joint industry comments (2019)

### Annex VI | Lessons learned in the lighting sector

Impact of modulated fees on the change in market share of certain lighting products

## About the WEEE Forum

The WEEE Forum is a Brussels-based for-impact, not-for-profit international association representing 45 producer responsibility organisations across the globe. Together with our members, we are at the forefront of turning the extended producer responsibility principle into an effective electronic waste management policy approach through our combined knowledge of the technical, business and operational aspects of collection, logistics, de-pollution, processing, preparing for reuse and reporting of e-waste. It is the biggest organisation of its kind in the world. Our mission is to be the world's foremost e-waste competence centre excelling in the implementation of the circularity principle. The PROs are based in Europe, the Americas, Africa, Oceania and Asia. It is the biggest organisation of its kind in the world. In 2019, its member organisations reported collection and proper de-pollution and recycling of 2,8 Mt of WEEE. Website: [www.weee-forum.org](http://www.weee-forum.org). Correspondence [pascal.leroy@weee-forum.org](mailto:pascal.leroy@weee-forum.org).

## About WEEE Europe

WEEE Europe AG is a pan-European non-profit organisation based in Munich, Germany. Our current 19 partners – leading Take Back Systems in Europe – have successfully established over 70,000 collection points and are currently collecting around 50% of the amount of WEEE collected in the entire EU including Norway and Switzerland. Next to the partner Take Back Systems we also cooperate with selected Take Back Schemes in all EU countries and therefore cover 30 countries (EU 27, UK, Switzerland and Norway) in terms of WEEE, batteries and packaging compliance. As Compliance Consulting Organisation WEEE Europe has served several hundred producers and organised their compliance across Europe. Via our declaration platform WEEE Europe handles the European Put on Market reporting for clients from both small start-ups over medium size companies and internationally operating groups.

## About APPLiA

APPLiA – Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of €53 billion, investing over €1.6 billion in R&D activities and creating nearly 1 million jobs.

## About DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies.

## About EucoLight

EucoLight is the European association of collection and recycling organisations for WEEE lamps and lighting. On behalf of its members, EucoLight engages with everything related to the WEEE Directive, legislations, and standards affecting the collection and recycling of WEEE lighting. EucoLight members collect and recycle, in aggregate, 80 % of the lamp waste collected in the 19 countries in which they operate. EucoLight is the voice of European WEEE compliance schemes specialized in managing the collection and recycling of WEEE lighting; working to make the circular economy a reality for lighting products. Founded in mid-2015, EucoLight has quickly embarked into constructive dialogue with relevant stakeholders to provide expertise in the field of management and treatment of WEEE lighting and to promote the positive role of Extended Producer Responsibility schemes on the environment and society. For more information, visit the EucoLight website [www.eucolight.org](http://www.eucolight.org).