

WEEE – Batteries - Packaging - News – November 2021.

Dear readers,

we have prepared the following topics for you this month:

ElektroG:	New WEEE treatment ordinance.
From the countries:	France, Spain, Finland, Luxembourg, Switzerland Austria.
From our perspective:	Main obligations from ElektroG3 - on the spot.

ElektroG: New WEEE treatment ordinance – a move towards more quality and sustainable recycling?

The German government has decided upon a new treatment ordinance already back in March 2021. Doing so, the government intends to make sure that collected WEEE is recycled on a high quality level and that hazardous substances are increasingly separated from the material flows. The new rules are supposed to capture those hazardous materials within the treatment process much earlier than currently and thus improve the overall recycling result.

Comment of RENE AG:

It has to be seen if a pure regulation is a sufficient means for improving WEEE recycling quality. Furthermore, observation and enforcement have to be executable. Recycling quality is ultimately reflected in the environmentally sustainable solutions for individual material fractions coming out of the treatment process.

The experience of 15 years of pan-European legislations show, however, that it would be more appropriate, from our point of view, to facilitate environmental-friendly recycling methods (e.g. for technical plastics) and support the state of the art of technology rather than putting one ordinance after the other in place with a lack of observation and control.

We estimate that eventually it will be once again the cheapest way of treatment that will be searched and promoted - which cannot be in the interest of a sustainable recycling approach.

Let's wait and see if this ordinance goes against a trend of 15 years and provides a plus for quality for both the environment and the WEEE recycling.

Source: RENE AG - October 2021

From the countries:

France: De-facto termination of individual collection systems.

From the 1st January 2022, the requirements from the French Decree against waste and for a circular economy (AGEC) will drastically increase the criteria for approval of individual collection systems from producers. It is to be expected that the criteria realistically cannot be met. Therefore, the producers and introducers of b2b products who are today running individual collection systems, are de-facto forced to join collective schemes. This will most probably increase the costs for administrative compliance of those producers but will not necessarily lead to more recycling volumes.

Source: LOI n° 2020-105 du 10 février 2020

Spain: Electronic tracking of WEEE

Since the 1st September 2021, the Real Decreto 553 / 2020 sets new requirements for the management of documents regarding WEEE returns in Spain. The core data of the reverse flow are to be entered into a web platform, thus making the actors and the material collected for treatment visible.

Source: Recyclia, Spain

Finland: Registration of foreign producers of batteries

Producers from outside Finland that sell batteries and accumulators directly to consumers or professional end users in Finland (distance sellers) do now also fall under the Extended Producer Responsibility in Finland. Those companies can become compliant by either joining a collective scheme or by nominating an Authorised Responsible. The registration needs be in place by the 31st December 2021.

Source: Elker, Finland

Luxembourg: From ten to six WEEE categories

From the 1st January 2022, the collective scheme Ecotrel in Luxembourg will change the reporting scheme from ten to six WEEE categories and thus apply to the regulation 30/07/2013. Ecotrel has published a guide that explains the transfer criteria. Furthermore, Ecotrel has made available an electrical and electronic equipment (EEE) list in order to simplify the scoping for producers. This EEE list is regularly updated. One of the recently added products are “connected pet doors”.

Source: Ecotrel, Luxembourg

Switzerland: Open scope.

