

## EucoLight position on the Directive on Waste:

8 November 2017

### **EucoLight recommendations to the trilogue negotiators with regards to the Proposal for a Directive of the European Parliament and of the Council amending Directive on waste and specifically on minimum requirements for extended producer responsibility**

EucoLight, the European association of Lighting WEEE compliance schemes would like to comment on the PRESIDENCY COMPROMISE PROPOSAL FOR CHANGES TO THE COUNCIL POSITION (COREPER 18 October) and draw the attention of the representatives of the negotiators on some specific points relating to extended producer responsibility.

#### **EucoLight key recommendations:**

- Extended Producer Responsibility is a fundamental element to making the Circular Economy a success. Provision of General minimum requirements in the Waste framework Directive are therefore a necessity (Amendment 18– Recital 6c (new) of the Council and Article 8a). Whether these requirements are supplementary to the minimum requirements established in waste stream specific legislation should also be specified (Amendment 28 – Recital 9 of the Council).
- Considering that producers of products bear responsibility for the management of the waste stage of a product's life cycle, the latter should be able to assume their responsibility individually or collectively, i.e. to create producer responsibility organisations (Amendment 27 - Recital 8f (new) of the European Parliament).
- Public authorities play an important role in in the organisation of municipal waste collection and treatment. It is however critical to avoid any overlapping of duties between the extended producer responsibility organisations and public authorities as regards the collection and treatment of municipal waste (Amendment 28 - Recital 9a (new) of the Council).
- When extended producers responsibility schemes are set up, it is essential that Member states put in place safeguards against conflict of interest between contractors and extended producer responsibility organisations (Amendment 31 – Recital 9c (new) of the European Parliament). EucoLight strongly supports the position of the European Parliament in this matter. The absence of conflict of interests has to be introduced in the final legislation. This would contribute to an undistorted market and allow producers responsibility organisations to freely choose the most efficient waste management operators.
- The role and responsibilities of all actors have to be clearly defined.
  - This includes the role of distributors, as they are a link between producers and the final consumer and often have takeback obligations. "Distributors" should

be explicitly listed (Amendment 128 - Article 8a – paragraph 1 – indent 1 of the European Parliament).

- “Fulfilment houses” should also be added to the list of actors. The reason for this is that an increasing level free riding have been observed that appear to take place through a number of online platforms. This encompasses both online platforms that domiciled outside of the EU, but also have a physical presence (warehouses and legal entities) within the EU (to be added to the same Article 8a – paragraph 1 – indent 1). The wording “online platforms” used in Amendment 25 – Recital 8d (new) of the European Parliament but rejected by the Council, is acceptable, too.
- The importance of reporting “reliable and accurate data” cannot be emphasised enough. A possible calculation of target for Member States should be based on reliable statistics, using erroneous data could have detrimental consequences for stakeholders involved in the Member States. We therefore recommend the inclusion of the concept of reliable and accurate data” in Article 8a – paragraph 1 – indent 3, as in Amendment 130 of the European Parliament.
- There should be no geographical restrictions limiting the collection and management of waste to certain areas, for instance where it is the most profitable. We welcome the proposal of the Council contained in Article 8a - paragraph 3 - point a (Amendment 133).
- As far the costs of waste management are concerned, producers need security regarding the scope of their financial obligations to comply with extended producer responsibility obligations. Hence, creating a non-exhaustive or open list of costs to be borne by producers, as proposed by the Council creates uncertainty and potential financing problems for the extended producer responsibility model. The Parliament proposal, on the contrary, defines the type obligations with a closed list using the wording “as follows”. This wording is much preferable, as it’s the only way to safeguard the requested certainty for producers (Amendment 139 - Article 8a - paragraph 4 - subparagraph 1 - point a refers). Each stakeholder can only be responsible for the costs falling under their control. Producers cannot therefore be held financially responsible for the coverage of the cost of littering or inadequate disposal. Furthermore the text of the Council refers to the costs of reuse, whereas the correct wording should be “preparation for reuse”.

**APPENDIX:**

COMMISSION PROPOSAL	EUROPEAN PARLIAMENT	PRESIDENCY COMPROMISE PROPOSAL FOR CHANGES TO THE COUNCIL POSITION  (COREPER 18 October)	EUCOLIGHT COMMENTS
<b>Amendment 18 Recital 6c (new)</b>			
		6c) The definition of extended producer responsibility scheme should be introduced to clarify that it means a set of measures taken by Member States requiring producers of products to bear financial responsibility for the management of the waste stage of a product's life cycle including separate collection, sorting and treatment operations. That obligation may also include organisational responsibility and a responsibility to contribute to waste prevention	Acceptable

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		and to the reusability and recyclability of products.	
<b>Amendment 26 Recital 8e (new)</b>			
	(8e) Extended producer responsibility provisions in this Directive aim to support the design and production of goods which take fully into account and facilitate the efficient use of resources during the whole life cycle of the products, including their repair, re-use, disassembly and recycling, without compromising the free circulation of goods in the internal market. Extended producer responsibility is an individual obligation on producers who should be	Not acceptable	Rejection by the Council of this European Parliament amendment is not acceptable; this definition provides essential principles e.g. the possibility for producers to be able to assume their responsibility individually or collectively, and the requirement for Member States to set up extended producer responsibility schemes for at least packaging, electrical and electronic equipment, batteries and accumulators, and end-of-life vehicles.

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	<p>accountable for the end-of-life management of products that they place on the market. Producers should be able, however, to assume their responsibility individually or collectively. Member States should ensure the establishment of extended producer responsibility schemes for at least packaging, electrical and electronic equipment, batteries and accumulators, and end-of-life vehicles.</p>		
<p><b>Amendment 27</b> <b>Recital 8f (new)</b></p>			
	<p>(8f) Extended producer responsibility schemes should be understood as a set of rules established by Member States to ensure that producers of products bear the financial</p>	<p>Not acceptable</p> <p>Not acceptable</p>	<p>Rejection of this amendment by the Council is not</p>

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	and/or operational responsibility for the management of the post-consumer stage of a product's life cycle. Those rules should not prevent producers from fulfilling those obligations either individually or collectively.		acceptable. The amendment rightly emphasises that producers can fulfil their obligations either individually or collectively i.e. by creating producers responsibility organisations.
<b>Amendment 28 Recital 9</b>			
(9) Extended producer responsibility schemes form an essential part of efficient waste management, but their effectiveness and performance differ significantly between Member States. Thus, it is necessary to set minimum operating requirements for extended producer responsibility. Those requirements should reduce costs and boost performance,	(9) Extended producer responsibility schemes form an essential part of efficient waste management, but their effectiveness and performance differ significantly between Member States. Thus, it is necessary to set minimum operating requirements for extended producer responsibility <b>schemes, be they individual or collective. It is necessary to make a</b>	(9) Extended producer responsibility schemes, <b>meaning a set of measures taken by Member States to ensure that producers of products bear responsibility for the management of the waste stage of a product's life cycle,</b> form an essential part of efficient waste management. <b>However,</b> their effectiveness and performance differ significantly between Member	Acceptable

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<p>as well as ensure a level-playing field, including for small and medium sized enterprises, and avoid obstacles to the smooth functioning of the internal market. <b>They</b> should also contribute to the incorporation of end-of-life costs into product prices and provide incentives for producers to <b>take better</b> into account recyclability <b>and</b> reusability <b>when designing their products</b>. The requirements should apply to both new and existing extended producer responsibility schemes. A transitional period is however necessary for existing extended producer responsibility schemes to adapt their structures and procedures to the new requirements.</p>	<p><b>distinction between those minimum requirements that apply to all schemes and those that only apply to collective schemes. Nevertheless, all</b> those requirements should reduce costs and boost performance <b>by measures such as facilitating better implementation of separate collection and sorting, ensuring better quality recycling, helping secure access to secondary raw material in a cost-efficient manner,</b> as well as ensure a level playing field, including for small and medium sized enterprises <b>and e-commerce enterprises</b> and avoid obstacles to the smooth functioning of the internal market. <b>Those requirements</b> should also contribute to the</p>	<p>States. Thus, it is necessary to set minimum operating requirements for <b>such</b> extended producer responsibility <b>schemes, and to clarify that those requirements also apply to EPR schemes established pursuant to other Union legislation, in particular Directive 2000/53/EC, Directive 2006/66/EC and</b></p> <p>Directive 2012/19/EU, in addition to the requirements already laid down in that legislation, <b>unless explicitly stated otherwise. Unless Member States decide otherwise, the general minimum requirements for extended producer responsibility schemes do not apply to schemes that do</b></p>	

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	<p>incorporation of end-of-life costs into product prices and provide incentives for producers to <b>develop smart business models and to take into account the waste hierarchy when designing their products through the stimulation of durability, recyclability, reusability and reparability. They should encourage the progressive substitution of substances of very high concern as defined in Article 57 of Regulation (EC) No 1907/2006 if there are suitable alternative substances or technologies that are economically and technically viable. The implementation of the minimum requirements for extended producer responsibility should be</b></p>	<p><b>not fulfil the definition of extended producer responsibility scheme.</b> Those requirements should reduce costs and boost performance, as well as ensure a level-playing field, including for small and medium sized enterprises, and avoid obstacles to the smooth functioning of the internal market. They should also contribute to the incorporation of end-of-life costs into product prices and provide incentives for producers to take better into account recyclability and reusability when designing their products. The requirements should apply to both new and existing extended producer responsibility schemes [...]. A transitional period is however</p>	



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	<p><b><i>supervised by independent authorities and should not create any disproportionate financial or administrative burden for public bodies, economic operators and consumers.</i></b> The requirements should apply to both new and existing extended producer responsibility schemes. A transitional period is however necessary for existing extended producer responsibility schemes to adapt their structures and procedures to the new requirements.</p>	<p>necessary for existing extended producer responsibility schemes to adapt their structures and procedures to the new requirements</p>	
<b>Recital 9a (new)</b>			
		<p><b>(9a) Public authorities play an important role in the organisation of municipal waste collection and treatment and related communication with citizens. Provisions relating</b></p>	<p>Acceptable</p>

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		<p>to the financial responsibility of producers introduced as part of the general requirements for extended producer responsibility schemes shall apply without prejudice to the competence of public authorities as regards the collection and treatment of municipal waste.</p> <p>In cases where public authorities are responsible for organising the operational aspects of managing waste from products subject to extended producer responsibility schemes, those services shall be provided in a cost-efficient manner and the financial responsibility of producers should not exceed</p>	

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		the costs necessary to provide those services. Such costs should be agreed in a transparent way between the concerned actors including producers, their organisations and public authorities.	
<b>Amendment 31 Recital 9c (new)</b>			
	<i>(9c) When schemes are set up for the collective implementation of extended producer responsibility, Member States should put in place safeguards against conflicts of interest between contractors and extended producer responsibility organisations.</i>	<b>Extended producer responsibility schemes</b>  Not acceptable	Rejection by the Council of this amendment of the European Parliament is not acceptable; it is essential that Member states put in place safeguards against conflict of interest between contractors and extended producer responsibility.

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<b>Amendment 34 Recital 10b (new)</b>			
	<b><i>(10b) The original waste producer has a key role to play in waste prevention and at the initial presorting stage.</i></b>	Not acceptable	Rejection by the Council of this amendment of the European Parliament is not acceptable; the role of the original waste producer (the consumer) is important to avoid future interests of the administration to pass to producer any "littering cost". Enhancing the role of the consumer as key actor at the beginning of the process, should be promoted.
<b>Amendment 121 Article 1 – paragraph 1 – point 7 – point a Article 8 – paragraph 1 – subparagraph 3</b>			
(7) Article 8 is amended as follows:	Such measures may also include the establishment of extended producer responsibility schemes, <b><i>which cover individual or collective</i></b>	(7) Article 8 is amended as follows:	

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<p>(a) in paragraph 1, the following sub-paragraph is added:</p> <p>'Such measures may also include</p> <p>the establishment of extended producer responsibility schemes defining specific operational and financial obligations for producers of products.';</p>	<p><b>fulfilment of extended producer responsibility. Such schemes shall consist of a set of rules</b> defining specific operational and/or financial obligations for producers of products <b>in which the producer's responsibility is extended to the post-consumer state of a product's life cycle. Member States shall set up such schemes for at least packaging as defined in point (1) of Article 3 of Directive 94/62/EC, electrical and electronic equipment as defined in point (a) of Article 3(1) of Directive 2012/19/EU, batteries and accumulators as defined in point (1) of Article 3 of Directive 2006/66/EC and end-of-life vehicles as defined in point (2) of Article 2 of Directive 2000/53/EC.</b></p>	<p>(a) in paragraph 1, the following sub-paragraphs are added:</p> <p><b>Where such measures include the establishment of extended producer responsibility schemes [...] as defined in Article 3 paragraph 20a, the general requirements in article 8a shall apply.'</b></p> <p><b>[...] Member States may decide that producers that undertake financial or financial and organisational responsibilities [...] for the management of the waste stage of a product's life cycle on their own accord should apply some or all of the</b></p>	

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		<p><b>general minimum requirements in article 8a.</b></p> <p><b>[...] Member States that establish extended producer responsibility schemes for the purposes of this paragraph, may decide whether producers should be able to choose to fulfil their obligations individually or collectively.</b></p>	<p>Not acceptable, the requirements should be mandatory</p>
<p><b>Amendment 127</b>  <b>Article 1 – paragraph 1 – point 8</b>                      Article 8a – title</p>			
<p>(8) The following Article 8a is inserted:</p> <p><i>'Article 8a</i></p>		<p>(8) The following Article 8a is inserted:</p> <p><i>'Article 8a</i></p>	<p>Acceptable</p>

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General requirements for extended producer responsibility schemes	General requirements for extended producer responsibility schemes <b>minimum</b>	General requirements for extended producer responsibility schemes <b>minimum</b>	
<b>Amendment 128</b> <b>Article 1 – paragraph 1 – point 8</b> Article 8a – paragraph 1 – indent 1			
- define in a clear way the roles and responsibilities of producers of products placing goods on the market of the Union, organisations implementing extended producer responsibility on their behalf, private or public waste operators, local authorities and, where appropriate, recognised preparation for re-use operators;	- define in a clear way the roles and responsibilities of <b>all actors involved, including</b> producers of products placing goods on the market of the Union, organisations implementing extended producer responsibility on their behalf <b>in the framework of collective schemes</b> , private or public waste operators, <b>distributors, regional and</b> local authorities and, where appropriate, <b>re-use and repair networks, social economy enterprises and</b>	- define in a clear way the roles and responsibilities of <b>all relevant actors involved, including</b> producers of products placing [...] <b>products Member State</b> , organisations implementing extended producer responsibility on their behalf, private or public waste operators, local authorities and, where appropriate, <b>reuse and [...]</b> preparation for re-use operators <b>and social enterprises;</b>	Not acceptable: The Council deleted “distributors” amongst those “relevant actors involved”; “distributors” should be explicitly mentioned, as did the European Parliament. EucoLight also recommends the addition of “fulfilment centres” or “online platforms” in the list of actors. In line with the European Parliament

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	recognised preparation for re-use operators;		
<p><b>Amendment 129</b>  <b>Article 1 – paragraph 1 – point 8</b>                      Article 8a – paragraph 1 – indent 2</p>			
<p>- define measurable waste management targets, in line with the waste hierarchy, aiming to attain at least the quantitative targets relevant for the scheme as laid down in this Directive,</p> <p>Directive 94/62/EC, Directive 2000/53/EC, Directive 2006/66/EC and Directive 2012/19/EU;</p>	<p>- define measurable <b>waste reduction targets and</b> waste management targets, in line with the waste hierarchy, aiming to attain at least the quantitative targets relevant for the scheme as laid down in this Directive,</p> <p>Directive 94/62/EC, Directive 2000/53/EC, Directive 2006/66/EC and Directive 2012/19/EU;</p>	<p>- define [...] waste management targets, in line with the waste hierarchy, aiming to attain at least the quantitative targets relevant for the scheme as laid down in this Directive, Directive 94/62/EC,</p> <p>Directive 2000/53/EC, Directive 2006/66/EC and Directive 2012/19/EU, <b>and other quantitative targets and/or qualitative objectives that are considered relevant for the</b></p>	<p>Not acceptable</p>



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		extended producer responsibility scheme;	
<b>Amendment 130</b> <b>Article 1 – paragraph 1 – point 8</b> Article 8a – paragraph 1 – indent 3			
- establish a reporting system to gather data on the products placed on the Union market by the producers subject to extended producer responsibility. Once these products become waste, the reporting system shall ensure that data is gathered on the collection and treatment of that waste specifying, where appropriate, the waste material flows;	- establish a reporting system to gather <b>reliable and accurate</b> data on the products placed on the Union market by the producers subject to extended producer responsibility. Once these products become waste, the reporting system shall ensure that <b>reliable and accurate</b> data is gathered on the collection and treatment of that waste specifying, where appropriate, the waste material flows;	- <b>ensure that</b> a reporting system <b>is in place [...]</b> to gather data on the products placed on the <b>[...] market of the Member State</b> by the producers subject to extended producer responsibility <b>[...] and data [...]</b> on the collection and treatment of [...] waste resulting from these products specifying, where appropriate, the waste material flows as well as data relevant for the purposes of obligations mentioned in the previous indent;	Not acceptable; <b>“reliable and accurate”</b> data on the products placed on the market should be emphasised, as did the European Parliament

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<b>Amendment 132</b> <b>Article 1 - paragraph 1 - point 8</b> Article 8a - paragraph 2			
2. Member States shall take the necessary measures to ensure that the waste holders targeted by the extended producer responsibility schemes established in accordance with Article 8, paragraph 1, are informed about the available waste collection systems and the prevention of littering. Member States shall also take measures to create incentives for the waste holders to take part in the separate collection systems in place, notably through economic incentives or regulations, when appropriate.	2. Member States shall take the necessary measures to ensure that the waste holders targeted by the extended producer responsibility schemes established in accordance with Article 8, paragraph 1, are informed about the available <b>take-back systems, re-use and repair networks, recognised preparation for re-use operators,</b> waste collection systems and the prevention of littering. Member States shall also take measures to create incentives for the waste holders to <b>assume their responsibility to deliver their waste into</b> separate collection systems in place, notably	2. Member States shall take the necessary measures to ensure that the waste holders targeted by the extended producer responsibility schemes established in accordance with Article 8, paragraph 1, are informed, about [...] waste [...] <b>prevention measures, centres for reuse and preparation for reuse, take back and</b> collection systems and the prevention of littering. Member States shall also take measures to create incentives for the waste holders to [...] <b>assume their responsibility to deliver their waste into</b> separate collection systems in place, notably through	Only partly acceptable (see below)

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	through economic incentives or regulations, when appropriate.	economic incentives or regulations, when appropriate.  <b>This provision is without prejudice to the specific obligations to provide information to end-users as laid down in Articles 8 and 9 of Directive 2000/53/EC, Articles 16 and 20 of Directive 2006/66/EC and Article 14 of Directive 2012/19/EU.</b>	Not only by incentive, it is up to the extended producer responsibility organisations to decide how
<b>Amendment 133</b> <b>Article 1 - paragraph 1 - point 8</b> Article 8a - paragraph 3 - point a			
(a) has a clearly defined geographical, product and material coverage;	(a) has a clearly defined geographical, product and material coverage <b>that is based on the sales area and</b>	(a) has a clearly defined geographical, product and material coverage <b>without limiting these areas to the</b>	Acceptable; it is rightly that the Council foresees no geographical restrictions limiting the collection and

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	<i>without limiting these areas to the territories in which the collection and management of waste are profitable;</i>	<b>territories in which the collection and management of waste are most profitable;</b>	management of waste to certain areas.
<b>Amendment 134</b> <b>Article 1 - paragraph 1 - point 8</b> Article 8a - paragraph 3 - point d - indent 1			
(d) makes publicly available the information about:  - its ownership and membership;		(d) makes publicly available the information about:  - <b>in case of collective fulfilment of extended producer responsibility obligations,</b> its ownership and membership;	Acceptable; refers to ownership and membership, an element in the plea for absence of conflict interest.

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<b>Amendment 135</b> <b>Article 1 - paragraph 1 - point 8</b> Article 8a - paragraph 3 - point d - indent 2			
- the financial <b>contributions</b> paid by the producers;	<b>- in the framework of collective schemes,</b> the financial <b>contribution</b> paid by the producers <b>per unit sold or per tonne of product placed on the market;</b>	<b>- in case of collective fulfilment of extended producer responsibility obligations,</b> the financial contributions paid by the producers <b>per unit sold or per tonne of product placed on the market;</b>	Acceptable
<b>Amendment 139</b> <b>Article 1 - paragraph 1 - point 8</b> Article 8a - paragraph 4 - subparagraph 1 - point a			
(a) cover the entire cost of waste management for the products it puts on the Union market, <b>including all the following:</b>	a) cover the entire cost of waste management for the products it puts on the Union market, <b>as follows:</b>	(a) cover [...] <b>at least the following</b> costs of waste management for the products it puts on the [...] market <b>in that Member State [...]:</b>  - costs of separate collection, <b>transport after collection,</b>	Not acceptable; the exhaustive list of the amendment of the European Parliament provides for a much higher legal security to producers bearing the responsibility of financing the waste management

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<p>- costs of separate collection, sorting and treatment operations required <b>to meet the waste management targets referred to in paragraph 1, second indent</b>, taking into account the revenues from reuse or sales of secondary raw material from their products;</p>	<p>- costs of separate collection, sorting, <b>transport</b> and treatment operations required to <b>ensure the proper management of waste</b> taking into account the revenues from re-use or sales of secondary raw material from their products;</p>	<p>sorting, and <b>other waste</b> treatment operations, <b>and where appropriate of reuse</b>, required to meet <b>at least</b> the waste management targets <b>established in Union legislation and to meet the other targets and objectives</b> referred to in paragraph 1, second indent, taking into account the revenues from reuse, [...] sales of secondary raw material from their products <b>or</b></p> <p><b>from unclaimed deposit fees;</b></p> <p>costs of providing adequate information to waste holders in accordance with paragraph 2;</p>	<p>Covers cost of reuse ? This is not properly named, it should say "cover of preparation for re-use".</p>

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<p>- costs of providing adequate information to waste holders in accordance with paragraph 2;</p> <p>- costs of data gathering and reporting in accordance with paragraph 1, third indent.</p>		<p>costs of data gathering and reporting in accordance with paragraph 1, third indent.</p>	
<p><b>Amendment 141</b>  <b>Article 1 - paragraph 1 - point 8</b>                      Article 8a - paragraph 4 - subparagraph 1 - point c</p>			
<p>(c) are based on the optimised cost of the services provided in cases where public waste management operators are responsible for implementing</p>	<p>(c) are based on the optimised cost of the services provided in cases where public waste management operators are responsible for implementing</p>	<p>(c) [...] <b>do not exceed the costs that are necessary to provide [...] waste management [...] services in a cost efficient way. Such costs shall be established</b></p>	<p>Acceptable</p>

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operational tasks on behalf of the extended producer responsibility scheme.	operational tasks on behalf of the extended producer responsibility scheme. <b>The optimised cost of the service shall be transparent and reflect the costs incurred by public waste management operators when implementing operational tasks on behalf of extended producer responsibility schemes.</b>	<b>in a transparent way between the actors concerned.</b>	
<b>Article 1 - paragraph 1 - point 8</b> Article 8a - paragraph 4 - subparagraph 1 - point d (new)			
		<b>(d) Where justified by the need to ensure the proper functioning of waste management, Member States may depart from the division of financial responsibility as laid down in 4(a) while ensuring that the producers bear [...] at least half of the necessary costs.</b>	Not acceptable; creates a high level of legal and financial uncertainty for producers.



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<b>Article 1 - paragraph 1 - point 8</b> Article 8a - paragraph 4 - subparagraph 2 (new)			
		Paragraph (a) [...] shall not apply to extended producer responsibility schemes established pursuant to Directive 2000/53/EC, [...] Directive 2006/66/EC and [...] Directive 2012/19/EU.	
<b>Amendment 144</b> <b>Article 1 - paragraph 1 - point 8</b> Article 8a - paragraph 7a (new)			
		<b>7a. The provision of information to the public under this Article shall be without prejudice to preserving the confidentiality of commercially sensitive information in conformity with the relevant Union and national law.</b>	Acceptable



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About EucoLight:

EucoLight is The European association of collection and recycling organisations for WEEE lamps and lighting. On behalf of its 19 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, 79 % of the lamps waste collected in the 18 countries in which they operate.

EucoLight is the voice of European WEEE compliance schemes specialised in managing the collection and recycling of WEEE lighting; working to make the circular economy a reality for lighting products. Founded 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), follow EucoLight on Twitter @EucoLight or contact the Secretary General, Marc Guiraud ([marc.guiraud@eucolight.org](mailto:marc.guiraud@eucolight.org)).