

Position Paper

Brussels
10 June 2016

EucoLight Comments on the **DRAFT OPINION** of the Committee on Industry, Research and Energy for the Committee on the Environment, Public Health and Food Safety on the proposal for a directive of the European Parliament and of the Council amending Directives 2000/53/EC on end-of-life vehicles, 2006/66/EC on batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on waste electrical and electronic equipment (COM(2015)0593 - C8-0383/2015 - 2015/0272(COD)) Rapporteur: Pavel Telička

EucoLight, the European association of Lighting WEEE compliance schemes has had the opportunity to review the draft opinion on the above-mentioned subject. It is particularly pleased to observe that the ITRE Committee amendments support Extended Producer Responsibility (EPR). EPR is indeed a key tool for an efficient circular economy, and EPR schemes a main driver for reaching collection & recycling targets. With the comments below, EucoLight would like also to draw the attention of the members of the ITRE Committee on specific aspects of importance, arising from the draft opinion:

ITRE	EucoLight comments
<p>Amendments 14 and 15 to add a new annex to the WEEE Directive in order to list instruments to promote a shift to a circular economy</p>	<p>This initiative is welcomed, but clarification on the wording is key:</p> <ul style="list-style-type: none"> • The inclusion of the "Pay as you through" concept might be welcome but its real relevance for WEEE schemes is unclear with the present wording. • The extension of the scope of Extended Producer Responsibility (EPR) to new Waste streams does not seem relevant in the context of the WEEE recast Directive, which has an open scope to all EEE, albeit with clearly set categories. • EucoLight supports the creation of an exchange platform to foster exchange of best EPR practices as long as it involves all actors in the chain including distributors. <p>This new Annex should therefore be rephrased.</p>

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 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, follow EucoLight on Twitter @EucoLight or contact the Secretary General, Marc Guiraud (marc.guiraud@eucolight.org).

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