



**EucoLight**

European Association of lighting  
WEEE compliance schemes



Annual Report 2019

# Making the Circular Economy a Reality for Lighting Products



**Hervé Grimaud**  
EucoLight Chairman

EucoLight provides constructive input to support the implementation of pragmatic EU legislation enabling the effective and sustainable collection and recycling of WEEE lamps and lighting. We advocate for EU harmonised rules for a level playing field. In 2019, we established, with partner stakeholders, an agreed definition of lamps in the context of the WEEE Directive open scope. We made recommendations to address sales of non-compliant products through online marketplaces, notably the absence of registration with a Producer Responsibility Organisation (PRO), and emphasised the importance of the enforcement of legislation and of collaboration with national authorities.

Our members have an enviable record of collection of high levels of lighting WEEE, and are determined to do even more to collect waste products, wherever they may be. Looking forward, it is perhaps the time to reflect on whether recycling and recovery targets should be adjusted to address the technological evolution from gas discharge lamps to LEDs.

The EucoLight family has expanded this year, and we had the pleasure to welcome Recycling Appliances SA from Greece as new member.



**Marc Guiraud**  
EucoLight Secretary General

In 2019 EucoLight streamlined its key priorities:

- Harmonise the interpretation of European regulations and directives
- Ensure a level playing field
- Define achievable collection and recycling objectives, and
- Manage lighting WEEE operations in an environmentally friendly manner.

As promoter of consistent requirements for Extended Producer Responsibility (EPR) across the EU, EucoLight has provided insights to the European Commission, its consultants and stakeholders on the planned guidance to EPR Schemes. Our last stakeholder event on the topic of non-compliant sales through online marketplaces attracted more than 100 participants from industry, e-commerce, European institutions and national administrations. We undertook a range of projects investigating the most efficient and environmentally friendly collection and treatment methods of end-of-life lighting products. EucoLight has provided support to its Members and helped its members in negotiations with their own national administrations.

Finally, I would like to thank our Board, our working groups members and notably their Chairs, for their ideas, insights and expertise. They are the engine of the association and no achievement would have been possible without them.

# EucoLight Priorities

## Harmonise the interpretation of European regulations and directives

- Agree on principles that are valid for the entire EU and facilitate achievement of the collection and recycling objectives
- Harmonize product and waste definitions and classification for lighting products
- Cooperate with producers' associations for a common understanding of the impact of circular economy principles on EucoLight members and their participants



## Ensure a level playing field

- Request the early adoption of mandatory consistent requirements for all EPR organizations
- Seek consistent reporting of all EEE and WEEE in the national registers
- Implement solutions to tackle the non-compliance of products sold through online marketplaces



## Define achievable collection and recycling objectives

- Calculation of collection targets must be based on accurate and relevant market data, including product lifespan
- Monitoring the recyclability of waste products as the material composition impacts the recycling rate performance
- Identifying efficient LED recycling technologies and addressing the challenges of LED material recovery



## Manage lighting WEEE operations in an environmentally friendly manner

- Importance of collecting GDL and LED in the same waste stream
- Influence the review of the CENELEC lamp collection and treatment standards
- Share knowledge and develop guidelines about the collection of luminaires



## Publications

### **Joint LightingEurope/ EucoLight lamp definition, now integrated in European WEEE Register Networks (EWRN) WEEE 2 guidance document**

- The published definitions bring greater clarity for producers, Producer Responsibility Organisations and governments.

### **Position paper on the public consultation on the EU product policy framework contributing towards a circular economy**

- Our message: EucoLight supports EU policies that enable the sustainable collection and recycling of lighting WEEE for the sake of the environment and the economy, and that allow Producer Responsibility Organisations to function in an optimized manner, and tackle the non-compliance products sold through online marketplaces.

### **Joint industry comments on modulating producers' financial contributions for WEEE**

- Fees must cover the real costs of end-of-life waste management.

- Criteria to underpin the modulation of the fees
  - should be harmonized at EU level & be consistent with existing legislation
  - must be simple, auditable, and enforceable
  - must be defined in close consultation with the relevant stakeholders.

### **Joint EucoLight/ LightingEurope position paper on the eco modulation of Fees in Waste Framework Directive (EU) 2018/851**

- Both organisations have questioned the relevance of eco modulation of fees for both lamps and luminaires, given that in the field of lighting, change is already driven by market evolution and the impact of eco-design legislation.

### **WEEE Directive, Article 15 - product information sheets**

- Displayed on the EucoLight website are LightingEurope product information sheets for recyclers on how to deal with lighting products at end of life.

## Studies / projects

### **Projects on the collection of end-of-life lighting products**

- Sensitivity analysis study based on 2017 Placed-On-Market data with variable scenarios for LED lamps lifespan to understand the impact on future collection performance. Such information is fundamental to ensure that collection targets are based on reliable data, and to enable EucoLight members to plan for the future.
- Multi-country survey on consumer attitudes to lamp recycling, conducted in 5 European countries (Austria, Germany, Italy, Spain, The Netherlands) by GfK to evaluate consumer knowledge and behaviour. The data is expected to help EucoLight members to improve collection rates.

### **Project to evaluate the scale of non-compliance of products sold through online marketplaces.**

- Multi-national survey of electrical equipment offered for sale through online platforms from non-registered sellers, showing the non-compliance of smaller products, such as LED lightbulbs, was 78-100%.

### Projects regarding logistics and treatment of end-of-life lamps in an environmentally friendly manner

- Evaluation of the various mercury analysis methods available
  - EucoLight members continuously search for best practices to depoluate mercury containing lamps. This study provides a review of the different methods available.
- LED Lamp Sorting and Recycling
  - This study benchmarked the sorting and recycling of LED lamps in several EU countries.
- Monitoring the sorting of LED and GDL lamps at treatment facilities
  - The study conducted by the Fraunhofer Institute identified the various classical identification techniques that are available to separate LED lamps.

- Plastics in lamps

- An analysis was conducted by TERRA, an independent French consultant, on fractions of lamps from 3 countries (France, Italy and Spain) to identify the composition of lamps and in particular to identify the types of plastics contained.

- Alternatives for glass

- In a project to identify potential areas where glass recovered from end-of-life lamps can be used, SZIKKTI Labor from Hungary demonstrated the suitability of soda lime glass of fluorescents tubes as additive in concrete, corundum ceramics and for the manufacturing of bricks and roof tiles.

## Support to EucoLight members at a national level

- Czech Republic: EucoLight letter raising serious concerns regarding the bulk reporting of EEE placed on the market by PROs and producers in the Czech Republic which create the risk of improper reporting of POM. The response from the Ministry of the environment of the Czech Republic addressed the concerns in the new draft law which requires that: “each producer is obliged to keep records individually to ensure the necessary data to be checked”.
- Poland: EWRN guidelines clarified that integrated LED luminaires should not be classified as lamps.

EucoLight members collected  
**52 000 tonnes**  
of lighting products in 2019

EucoLight members have  
established **127 000**  
lighting collection points

# EucoLight in the Public

## EucoLight conferences

November 2019, Brussels

“Preventing evasion of extended producer responsibility obligations through online platforms” attended by around 100 delegates



April 2019, Copenhagen

The EucoLight annual member meeting, attended by 70 delegates from 19 lighting WEEE compliance scheme



## Presentations

Spanish national WEEE Congress  
October 2019, Toledo



ISWA 2019 World Congress,  
October 2019, Bilbao



International E-Waste Day,  
October 2019, youtube video  
with other sectors



International Stewardship Forum  
July 2019, Paris



Joint European EPR organisations  
meeting on EPR and online free  
riding with ETRMA, EXPRA,  
EUCOBAT and WEEE Forum  
March 2019, Brussels



# Board Members and Working Group Chairs

## EucoLight Board:



**Hervé Grimaud**  
Chairman  
Deputy Managing  
Director  
Ecosystem (FR)



**Marion Mitsch**  
Vice Chairwoman  
Managing Director  
UFH (AT)



**Stephan Riemann**  
Treasurer  
Managing Director  
Lightcycle (DE)



**Tomáš Rychetský**  
Board Secretary  
Managing Director  
EKOLAMP s.r.o (CZ)



**Ourania Georgoutsakou**  
Board Member  
Secretary General  
LightingEurope (EU)

## EucoLight Working Groups:



**Natalia Sierra**  
Chairwoman of the  
Policy working group  
Director Relations and  
Public Affairs  
Ambilamp (ES)

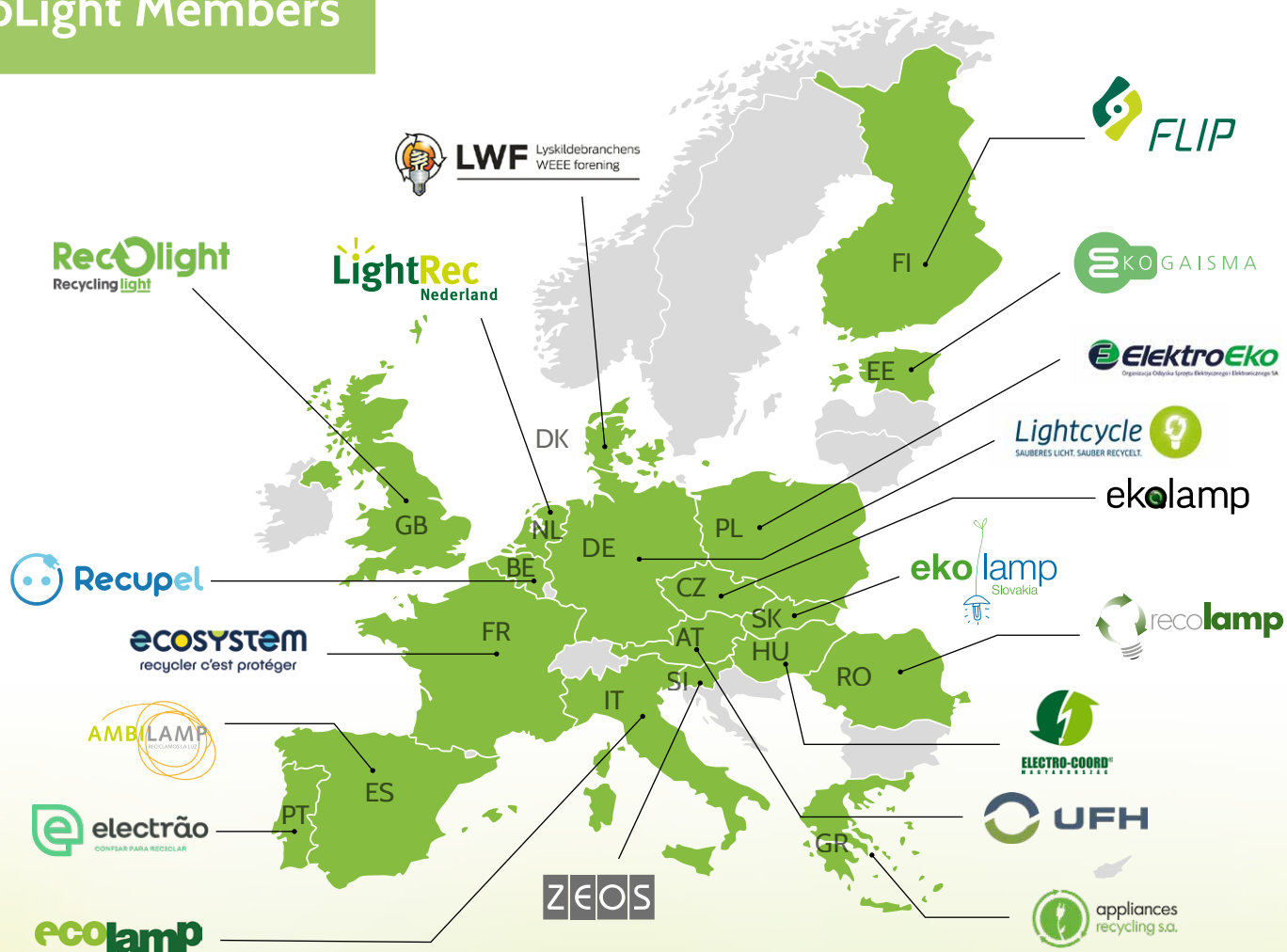


**David Horcajada**  
Chairman of the Marketing  
and Communications  
working group  
Director of Marketing  
and Communications  
Ambilamp (ES)



**Xavier Lantoinette**  
Chairman of the  
Logistics and Treatment  
working group  
Technical Director  
Ecosystem (FR)

# EucoLight Members



## Affiliate Member:



**LIGHTINGEUROPE**  
THE VOICE OF THE LIGHTING INDUSTRY

EucoLight AISBL  
BluePoint, Bd A. Reyers, 80  
B-1030 Brussels  
Tel: +32 487 344 876  
marc.guiraud@eucoLight.org  
[www.eucoLight.org](http://www.eucoLight.org)

