



**EucoLight**

European Association of lighting  
WEEE compliance schemes

Annual Report 2024

# Making the Circular Economy a Reality for Lighting Products



**Fabrizio D'Amico**  
EucoLight Chairman

The Lighting WEEE producer responsibility organisations network has existed for about 20 years thanks to the will of the producers who founded them with the first WEEE legislation. 10 years ago, the choice was made to create EucoLight, which would represent an authoritative voice in Brussels for the PROs focused on the recycling of lamps and luminaires.

In 2024, our association has fostered its mission to share best practices and represent the specific needs of the sector, with a close link with lighting producers represented by LightingEurope. EucoLight further engaged with the relevant stakeholders to deepen discussions on specific aspects of the WEEE regulatory framework, to defend the extended producer responsibility model, and relay EucoLight members' successes in collection and treatment of lighting WEEE. Looking ahead, EucoLight is implementing a sustainability and circularity workplan addressing the post-use phase of lighting products.

The successful EucoLight conference, that Ecolamp had the honour to organise in Venice-Mestre, was a reminder of the constant commitment of EucoLight members in enhancing a real European platform for recycling lighting WEEE. From this perspective, the conference with its content, moments, work, and networking represented a fundamental step in the path of EucoLight towards future challenges.

Finally, let me express our deep recognition and gratitude to Juan Carlos Enrique, Managing Director of AMBILAMP (Spain), the first Chairman of EucoLight 2015-2018 and Vice-Chairman 2022-2024, who retired at the end of the year.



**Marc Guiraud**  
EucoLight Secretary General

This year, we worked on the key points identified to be addressed in the future WEEE Directive such as the clarification of the “placing on the market concept”, the plea for realistic collection targets methodology, a fair level playing field for all actors, and solutions for online free riding.

These endeavours in policy matters were fuelled with dialogue with stakeholder involved in the EU discussions on WEEE such as producers, recyclers, national registers, not to forget the relevant policy makers at the European Commission and their consultants.

Collection and recycling of WEEE lighting is the bulk of daily work of EucoLight members. Therefore, we put an emphasis on activities in our Logistics and Treatment Working Group in generating information of common interest and exchange on best practices on collection and recycling of lighting WEEE:

- LED sorting and recycling,
- Lamp glass acceptors
- Recovery of critical raw materials
- WEEE treatment standards.

We have expanded our work plan to cover sustainability topics such as carbon footprint calculation, remanufacturing, batteries in WEEE lighting, tracking of substances of concern.

# EucoLight priorities

## Harmonise the interpretation of European Regulations and Directives

- Encourage harmonised solutions to EU single market issue. Seek to harmonise product and waste definitions and classification for lighting products.
- Cooperate with producers' associations for a common understanding of the impact of circular economy principles and practices on EucoLight members, including durability, repairability, upgradeability, design for disassembly, ease of re-use and recyclability, CO2 emissions calculations and mitigation.

## Ensure a level playing field

- Encourage the early adoption of mandatory consistent requirements, including operational and financial requirements, for all EPR organisations, that reflect the professionalism and integrity of EucoLight members.
- Seek consistent reporting of all EEE and WEEE in the national registers.
- Seek solutions to tackle freeriding when products are placed on the market notably through online marketplaces.

## Define achievable collection and recycling objectives

- Reliable data for setting adequate collection targets. Explain the importance of collecting gas discharge lamps and LED in the same waste stream. Identify efficient LED recycling technologies and addressing the challenges of LED material recovery.
- Support remanufacturing and reuse in current industrial practices of the WEEE Lighting collection and treatment

## Encouraging Producer Responsibility Organisations to adopt eco-friendly lighting WEEE practices

- Monitor product recyclability, as material composition affects recycling performance.
- Monitor all issues affecting the quality of treatment outputs of lighting WEEE in the CENELEC WEEE standards review.
- Share knowledge and develop guidelines about the collection of lamps and luminaires with the least possible environmental impact.
- Present key principles of CO<sub>2</sub> emission reduction and ESG integration in practices related to lighting product collection and recycling

# Achievements 2024

## Review of the Waste Electrical and Electronic Equipment (WEEE) Directive

The European Commission study supporting the evaluation of the WEEE Directive was in preparation phase over 2024. EucoLight outlined key challenges for a new WEEE Directive with European Commission representatives and took part in dialogues with other industry associations such as LightingEurope, APPLiA, DigitalEurope, EWRN, EERA and the WEEE Forum for exchange of on the review of the WEEE Directive.

It also devised the impact of the recently adopted European Critical Raw Materials Act and its links to the future WEEE Directive with policy makers.

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## Works on specific aspects to be addressed in the new WEEE Directive:

**Concept of “Placing on the market”:** An internal survey showed that the concept of “placing on the market”, particularly in cases where a producer supplies a product on the market, is interpreted inconsistently across Member States. This leads to significant implications on the financial responsibility borne by producers and for the comparability of placed-on-the-market data across Member States. EucoLight recommends that the interpretation according to which it should be the first commercial transaction in the territory be specified in the future WEEE Directive.

**Online Free riding:** An internal survey highlighted members preferred regulatory solution to address online free Riding in future WEEE legislation. Specifically, requiring online platforms to verify that sellers are registered in EPR schemes (compulsory verification model), or, if verification is not performed, assuming the extended producer obligations on behalf of the producer. In doing so, the legislators would integrate elements of EU Digital Services Act (DSA), the new Batteries Regulation, and the new Packaging and Packaging Waste Regulation, into WEEE legislation.

**WEEE subcategories:** EucoLight considered the possibility to harmonise subcategories for lamps and luminaires, for reporting purposes.

## Objecting to the inclusion of state-run PROs in EU legislation

EucoLight co-signed a joint letter, with numerous European organisations, against the legitimisation of state-run PROs in several pieces of EU legislation. We highlighted the detrimental impact of state-run PROs, which lack direct producer involvement, on the effectiveness of waste management and recycling initiatives. The letter called for the removal of references to state-run PROs from the Waste Framework Directive and urges the EU to monitor and revise the implementation of such systems to ensure they align with best practices for sustainability.

## Best practices in collection, and recycling of lighting WEEE:

- **LEDs in the lamp waste flow:** statistical exercise to monitor the quantities of LED lamps based on data from EucoLight members. At the end of 2024, the European average was 9% compared than 1% in 2017, when EucoLight first started this exercise.
- **Lamp glass acceptors survey:** internal survey on lamp glass recycling data and perspectives, including glass acceptors.
- **LED lamps sorting and recycling:** feedback from members on best practices in the countries and extraction of precious metals in LED lamps.
- **Monitor the review of the CENELEC WEEE treatment standards:** the EucoLight took part in the CENELEC dedicated workgroup that has started a review of the current standards.

## Joint statements:

- **Joint Statement – European stakeholders for a level playing field for online marketplaces and effective enforcement.**
- **Joint Letter: Call against the inclusion of State-Run Producer Responsibility Organizations in EU legislation.**

## Sustainability and circularity:

**Common approach for carbon footprint calculation:** we investigated whether a common approach e.g. a common tool, based on Life Cycle Analysis, for calculating the CO<sub>2</sub> impact of collection and recycling of lamps and luminaires could be developed. Objective: helping members to respond to sustainability reporting demands from the producers and potentially improving sustainable WEEE management.

**Cooperation with lighting producers:** LightingEurope and EucoLight identified a set of key topics of cooperation between producers and Producers Responsibility Organisations, members of EucoLight to generate on sustainability e.g. remanufacturing, ESPR and substances of concerns, CRM and recycled content and management of WEEE lighting that contain batteries.

## Partner associations



**LIGHTINGEUROPE**  
THE VOICE OF THE LIGHTING INDUSTRY



europaan weee registers network



EUROPEAN ELECTRONICS RECYCLERS ASSOCIATION



EPRClub



# EucoLight in the Public

## EucoLight Conference in Venice - May 2024



Over 50 delegates from across Europe, including representatives from the European Commission, producers and PRO representatives, and technical consultants, met in Venice-Mestre and online to discuss the challenges of the new EU legislation, the role of take-back systems, enforcement across the management chain, sustainability trends, digital product passports, ESG reporting, and best-practice sharing from EucoLight members.

## Social Media Presence

EucoLight continues its social media presence posting for international days related to recycling, for EucoLight positions joint statements and member's activities.



## Stakeholder dialogue

EucoLight engaged in several high-level stakeholder dialogues throughout 2024. At the LightingEurope Green Deal event in Frankfurt, Secretary General Marc Guiraud joined a broad panel of authorities, designers, industry, NGOs, consumers, and the European Commission to discuss the implementation and enforcement of the EU Green Deal.



Our Secretary general also talked at the European forum for Manufacturing Forum event held at the European Parliament and presented in the UBA TES Academy working group on WEEE, on EucoLight's recommendations to address online free-riding and strengthen enforcement. The discussions involved national authorities, OECD, academia, and PROs, covering topics of WEEE legislation and compliance.



# EucoLight Board



**Fabrizio D'Amico**

Chairman  
Managing Director  
Ecolamp (IT)



**Gied Van Hoorn**

Treasurer and  
Managing Director  
LightRec Nederland  
(NL)



**Juan Carlos  
Enrique Moreno**

Vice Chairman and  
Managing Director  
Ambilamp (ES)



**Andreas Adams**

Board Member,  
representative of  
LightingEurope (EU)

# Working Group Chairs and Team

## Working Group Chairs:



**Natalia Sierra  
Conde Saraiva  
de Carvalho**  
Policy working group  
Institutional and Public  
Affairs Director  
Ambilamp (ES)



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



**Zoltan Pilter**  
Chairman of the  
Logistics and Treatment  
working group from  
October 2024

## EucoLight Team:



**Marc Guiraud**  
Secretary General



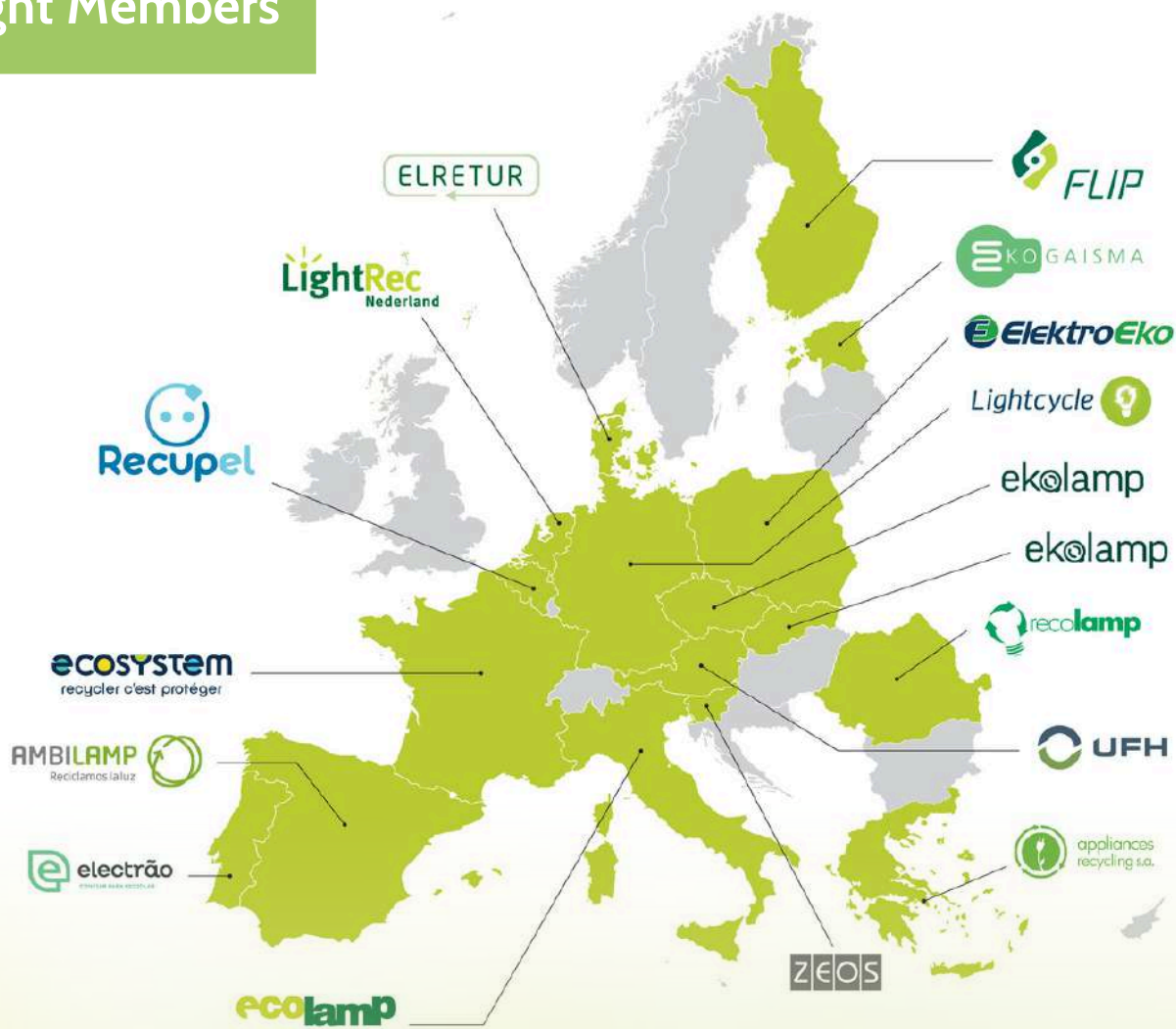
**Maria Sanchez  
Rodriguez**  
Junior Officer for Public  
Affairs and  
Communications until  
April 2024



**Guillaume Lienart**  
Public Affairs and  
Communications Intern  
from April 2024



# EucoLight Members



Affiliate Member:



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THE VOICE OF THE LIGHTING INDUSTRY

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