



EucoLight

European Association of lighting
WEEE compliance schemes



Annual Report 2025

Making the Circular Economy a Reality for Lighting Products



Gied van Hoorn
Chairman

Marking our tenth anniversary in 2025 gave us a natural moment to look back and, more importantly, to look forward with clarity about what the next decade of EucoLight needs to achieve. When our members founded this association ten years ago, the ambition was to give the lighting sector extended producer responsibility a coherent, professional voice in the shaping of European waste policy. Reflecting on the year just past, I am proud to say that ambition has only grown stronger.

2025 marks a pivotal chapter for EucoLight and the lighting sector. As the European Union advances its circular economy agenda, our focus remains firmly on driving a fair, effective, and modernized WEEE Directive and circular economy legislation.

We responded to all impact assessment consultations launched by the European Commission and shared our key priorities for the upcoming period. We advocated for lamps and lighting specific requirements, for realistic collection and recycling targets, and made proposals to tackle free-riding marketplaces and the protection of compliant compliance schemes.

Our deepened cooperation with LightingEurope, our seat at the table in the European Commission's Expert Group on Waste, are proof that this approach earns EucoLight real standing in Brussels.

Looking ahead, we will continue our efforts towards a fair level playing field for our producer responsibility organisations and producers in the WEEE Directive revision and the European Circular Economy Act.

Finally, I would like to conclude by expressing our sincere thanks to Fabrizio D'Amico, Managing Director of Ecolamp (Italy), my predecessor as EucoLight Chairman 2021-2025.



Marc Guiraud
Secretary General

In 2025, EucoLight's activities focused on regulatory developments, technical work, stakeholder engagement and sustainability-related initiatives. The year also marked the association's tenth anniversary, an opportunity to celebrate a decade of cooperation, recognise the contribution of members and partners, and reflect on the progress achieved since EucoLight's establishment.

Throughout the year, EucoLight contributed to discussions on the forthcoming Circular Economy Act and the revision of the WEEE Directive. With the expertise of its Policy, Logistics and Treatment Working Groups, the association submitted responses to European Commission consultations and published Current Actions and Future Directions, setting out recommendations for the future WEEE framework and circular economy policies.

EucoLight also contributed to consultations on the EU's environmental simplification initiative (Omnibus VIII), submitting a position paper on the proposed €2/kg levy on non-collected e-waste and raising concerns about its effectiveness, administrative burden, and potential impact on producers and consumers.

Technical activities remained a core part of EucoLight's work programme. The association contributed to the revision of WEEE treatment standards, monitored lamp waste streams and facilitated the exchange among members on sampling methodologies, collection practices and treatment operations.

Stakeholder engagement was strengthened through participation in the European Commission Expert Group on Waste, involvement in the Joint Association Roundtable on WEEE and the establishment of a dedicated PRO Roundtable.

On sustainability, EucoLight continued work on a common life-cycle carbon accounting methodology for members' operations and expanded cooperation with LightingEurope on topics including recycled content, critical raw materials, implementation of the Ecodesign for Sustainable Products Regulation (ESPR), substances of concern and remanufacturing.

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 CO₂ emission reduction and ESG integration in practices related to lighting product collection and recycling

Achievements 2025

Contribution to the Circular Economy Act / WEEE Directive revision impact assessment

EucoLight submitted comprehensive input the European Commission's multiple questionnaires and stakeholder consultations. The association's contributions focused on harmonising registration and reporting requirements across the EU, ensuring all actors contribute to collection obligations, improving collection target methodologies to better reflect product lifespans, maintaining LED lamps within WEEE Category 3, adapting recycling targets to the transition from mercury-containing lamps to LEDs, and ensuring EPR funding remains dedicated to waste management and recycling activities. EucoLight also highlighted the circular economy potential of lighting products.

E-waste levy

EucoLight also submitted a dedicated statement objecting to the European Commission's proposed introduction of a levy on non-collected e-waste (so-called "e-waste tax" of €2/kg), issued on 30 July 2025. The statement highlighted the lack of expected benefits for collection rates or circularity, the disproportionate cost burden on producers and consumers, and the risk of conflicts with existing or future national taxes, while warning against transforming PROs into tax-collecting bodies at the expense of their core mission.

EU simplification Omnibus

In addition, EucoLight contributed to the European Commission's initiative on the simplification of EU environmental legislation, submitting input on 10 September 2025. The response focused on five key priorities: addressing the inconsistent interpretation of "placing on the market" under WEEE, strengthening obligations for online platforms and fulfilment centres, improving producer registration through EU-level coordination, clarifying and reinforcing the role of Authorised Representatives, and reconsidering the need for the SCIP database.

Technical work on collection, recycling

On technical and operational matters, EucoLight contributed to targeted questionnaires under the WEEE Impact Assessment and the Circular Economy Act, drawing on the expertise of LTWG volunteers. The association also continued its engagement in CENELEC activities supporting the revision of WEEE treatment standards, ensuring that lighting-specific requirements are appropriately reflected. In parallel, EucoLight continued to produce statistical analyses tracking the evolution of lamp technologies in waste streams, providing valuable insights to support members' activities and policy positions.

Publications and Joint Statements

- Joint Industry Statement on State-Run Producer Responsibility Organisations 16 May 2025
- EucoLight Objects to the European Commission Proposal to Introduce a New Tax Based on Non-Collected E-Waste 30 July 2025
- Closing the Loopholes: A Call for Stronger EU Rules for Safer and Fairer e-Commerce 17 September 2025
- EucoLight Answer to the European Commission Call for Evidence: "Simplification of Administrative Burden in Environmental Legislation" 10 September 2025
- Joint Letter on Proposed Unitary Own Resource on Non-Collected E-Waste 6 October 2025
- Joint Industry Statement on Slovakia's Proposed Amendment to the Environmental Fund Act 6 November 2025

Advancing sustainability and carbon footprint methodologies

EucoLight progressed the development of a lifecycle-based approach for calculating greenhouse gas emissions associated with the collection and recycling of lamps and luminaires. Following a review of existing methodologies and tools, the association agreed on a common framework based on a Life Cycle Assessment model developed by COWI (Denmark), supporting consistent emissions accounting across the various stages of waste management. Covering activities such as reuse, recycling, incineration and disposal, the initiative aims to provide a robust basis for measuring environmental performance, identifying improvement opportunities, and supporting sustainability reporting within producer responsibility operations.

Cooperation with LightingEurope on sustainability topics

EucoLight further strengthened cooperation with LightingEurope on sustainability-related topics, including recycled content, critical raw materials, Ecodesign for Sustainable Products Regulation (ESPR) developments, and substances of concern in waste streams. The association contributed to discussions on the use and tracking of substances of concern and assessed industry practices through targeted surveys. Additional work focused on the remanufacturing potential of lighting products, helping to identify operational challenges, clarify key concepts, and support future collaboration across the lighting value chain. EucoLight also reviewed how its members manage lighting products containing batteries, providing a better understanding of current practices.

EucoLight Brochure

EucoLight brochure:
Our proposals for the revision of the WEEE Directive



Partner associations



EucoLight in the Public

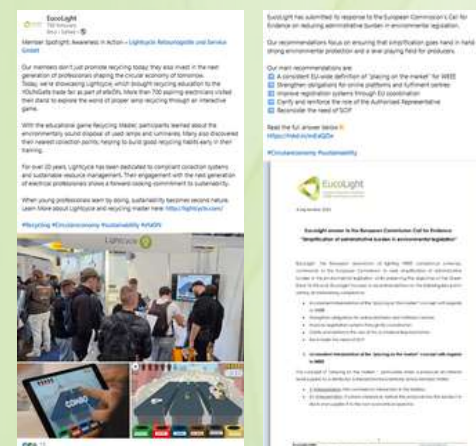
EucoLight 10-Year Anniversary Conference



EucoLight celebrated its 10-Year anniversary with a conference held on 14-15 May 2025 in Brussels. The event brought together more than 65 industry leaders, policymakers and compliance experts to reflect on a decade of collaboration and discuss the future of extended producer responsibility and the lighting sector legislative framework. The conference provided an opportunity to review EucoLight's achievements over the past decade and explore the challenges and opportunities arising from upcoming legislative initiatives, including the revision of the WEEE Directive and Circular Economy Act. It also served as a platform to exchange views on the future of lighting collection, recycling and circularity in Europe.

Communication

EucoLight continued to strengthen its communication activities through its social media channels, sharing updates on policy developments, joint industry initiatives, and the member's projects and achievements. To mark its 10th anniversary, the association also developed and published a dedicated brochure outlining its recommendations for the revision of the WEEE Directive, highlighting key priorities for the future of lighting waste management and circularity.



Stakeholder dialogue



EucoLight maintained active engagement with industry partners, policymakers and EU institutions throughout 2025. In cooperation with LightingEurope's Task Force on Waste, the association contributed to discussions on the WEEE Directive, the Waste Shipment Regulation and broader waste policy developments.

EucoLight also continued to advocate for producer-led Extended Producer Responsibility systems and reinforced its institutional presence through participation in the European Commission Expert Group on Waste. In addition, the association contributed to key sector events and policy discussions on WEEE collection targets, e-commerce, sustainability, circular economy policies and the modernisation of EU environmental legislation.

EucoLight Board



Fabrizio D'Amico

EucoLight Chairman
until May 2025,
Managing Director
Ecolamp (IT)



Gied Van Hoorn

EucoLight Chairman
as of May 2025,
Managing Director
LightRec Nederland



Andreas Adams

Board Member,
representative of
LightingEurope



**Natalia Sierra
Conde Saraiva
de Carvalho**

Vice Chairwoman
as of May 2025,
Chief Policy
Officer at
Ambilamp (ES)



Tomáš Rychetský

Treasurer as of May
2025, Managing
Director Ecolamp at
Ecolamp CZ and
Ecolamp SK

Working Group Chairs and Team

Working Group Chairs:



**Natalia Sierra
Conde Saraiva
de Carvalho**
Chairwoman of Policy
WG, Institutional and
Chief Policy Officer at
Ambilamp (ES)



David Horcajada
Chairman of Marketing
and Communications
WG, Director of
Marketing and
Communications at
Ambilamp (ES)



Zoltan Pilter
Chairman of Logistics
and Treatment WG,
Consultant at PZ
Consult.

EucoLight Team:

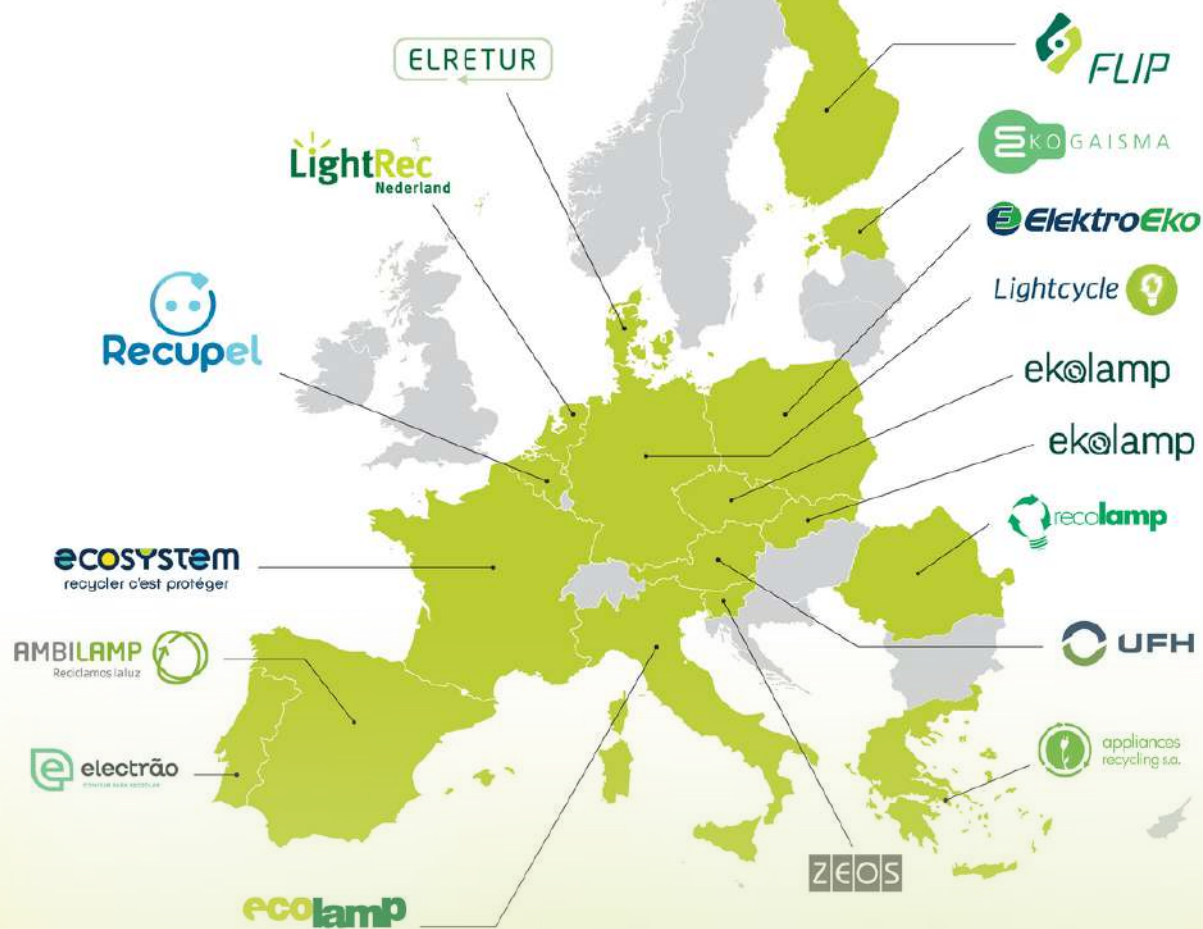


Marc Guiraud
Secretary General



Guillaume Lienart
Public Affairs and
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EucoLight Members



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THE VOICE OF THE LIGHTING INDUSTRY

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