November 2026

Joint Priorities for an effective WEEE framework revision

Shared views from across the WEEE value chain on the WEEE revision under the Circular Economy Act

The upcoming revision of the Waste Electrical and Electronic Equipment (WEEE) framework and the new Circular Economy Act are an opportunity to make Europe's circular economy a pillar of its industrial strategy. This paper brings together shared priorities from across the WEEE value chain, including **producers**, **Producer Responsibility Organisations (PROs)**, **waste managers** and **recyclers** around a common belief: a well-functioning WEEE system is one where every actor that handles WEEE has a clear role, a matching obligation, and the means to meet it, under rules that are proportionate and enforceable.

Today, too much WEEE leaves the authorised chain — lost to informal collection, scavenging, illegal export, or substandard treatment — at a cost to the environment and waste prevention, to the competitiveness of compliant operators, and to Europe's access to the critical raw materials its industry needs. The priorities set out below are the conditions required to reach our common objective: a WEEE framework that collects more and more efficiently, keeps material within authorised and traceable channels, and delivers secondary raw materials of a quality that European industry can rely on.

Below are the 10 priorities that 15 organisations from across the WEEE value chain share as the foundation for an effective WEEE revision

1 Defined roles and enforceable obligations for every operator handling WEEE

Every operator that holds or moves WEEE should have a clearly defined role and corresponding legal obligations proportionate to its control over the waste, using definitions harmonised with applicable EU legislation (e.g., the Waste Framework Directive, and the Batteries and Packaging Regulations). This does not alter the financial responsibility of Electrical and Electronic Equipment (EEE) producers and PROs: producers finance the system through PROs, which organise collection and finance treatment. Rather, the revised WEEE framework should clarify the obligations of every actor across the value chain. Actors collecting and transporting WEEE — e.g., municipalities, retailers, and logistics operators — should do so in line with officially recognised collection and handling standards (EN 50625 series). Furthermore, these actors should be legally bound to hand over WEEE only to authorised operators. Establishing these mandatory baseline duties in legislation simplifies contractual negotiations between PROs and intermediate actors, ensuring greater transparency rather than relying on ad-hoc, case-by-case agreements. All operators should work together towards achieving applicable targets.

Separately collected WEEE must be handed over only to authorised operators, ensuring accessibility for preparation-for-reuse operators in following the principles of the waste hierarchy. The handover obligation should be a legal duty for whoever holds the WEEE, rather than a voluntary step (leaving no possibility of diversion to metal scrap or indiscriminate shredding routes). Each Member State should maintain a public list of certified collectors, transporters, and operators authorised to receive and/or treat WEEE.

2 Mandatory treatment standards as a condition of market access

Authorisation to receive and treat WEEE should be conditional on compliance with the core CEN/CENELEC EN 50625 and EN 50614 series. To this end, the revised WEEE legislation should explicitly reference these standards and link legal compliance to meeting their requirements. The standards should also cover equipment requiring on-site dismantling and the removal of refrigerants and other regulated substances prior to further treatment.

Extended Producer Responsibility (EPR) fees should reflect the actual cost of waste treatment, including treatment to the mandatory standard. If compliance increases an operator's treatment costs, this should be reflected in the negotiated contractual prices with PROs and, consequently, in the EPR fees. If PROs request audits to ensure compliance with these standards, the cost of the audits shall be borne by the party requesting them.

Mandatory standards must be matched by effective enforcement to ensure a level playing field.

The Commission should issue a formal standardisation request now, with the involvement of treatment operators, which should also consider measures aimed at addressing fires related to batteries. This will ensure standards are updated when the new legislation comes into force, and the legislative text should also provide for their periodic review to keep up with innovative developments. Given that a rising number of appliances include potentially sensitive data, compliance with these standards should accommodate security-driven data sanitisation in accordance with recognised standards (e.g., under NIST SP 800-88 R1 and IEEE 2883) and destruction methods where legally or contractually required by data controllers or equipment owners.

3 Materials Recovery from WEEE

The recovery of certain materials from WEEE currently faces a fundamental economic challenge: without sufficient demand and viable markets, recovering these materials may not be economically feasible. If the European Commission considers mandating the recovery of certain materials, the requirement should be realistic and technically feasible — taking into account available volumes as well as the quality and technical suitability of recycled materials to allow downstream operators to absorb them — and accompanied by demand-side measures that support market development rather than introducing new regulatory requirements. Any such measures should be introduced only after a feasibility study is carried out and in a coordinated manner.

4 Integrity of the material along the collection chain

Authorised collection points and aggregation points (sites where collected WEEE is consolidated before onward transport to authorised operators) should be subject to minimum proportionate, risk-based requirements against theft, scavenging, and cherry-picking. Collection points should offer maximum convenience to consumers in terms of accessibility and location, and they should be accessible to all citizens. WEEE should be collected, stored, and transported in ways that preserve its condition and prevent damage and battery fires. Member States should hold

collection point operators accountable for the integrity of the WEEE until handover to an authorised, certified operator.

Today, battery fires are the main operational, insurance, and human safety risk in the WEEE management sector. Currently, the impact of these fires is mostly borne by waste operators, insurers, and emergency services. To address the problem, more coordinated actions across the value chain are necessary, as well as dedicated funding under instruments such as the EU Competitiveness Fund. Namely, PROs should support progress on this issue by contributing to operational best-practice guidelines, improving consumer awareness on safe battery disposal, and finding better solutions to reduce risks and damages in the waste chain related to batteries.

5 Traceability of WEEE flows and harmonisation of registration and reporting obligations

Reporting data on the handover of WEEE should be sent digitally to the national register. Streamlined reporting should cover every step and actor along the WEEE chain, including recyclers, rather than only the collection stage. Where scavenged equipment is delivered to an approved WEEE recycler, this should be reported as a separate item. Where relevant, digital reporting should also facilitate the exchange of information on the recovery of regulated substances removed during decommissioning and treatment, supporting compliance across related EU legislation.

The register should build on existing national and EU infrastructure. Where data has already been reported to another authority or actor, it should be retrieved from there, rather than requested a second time.

The national register should be the single public digital point where data is held. Public access should extend to the list of authorised operators so that anyone can verify who is entitled to receive and treat WEEE, while commercially confidential reported data — specifically individual producer market placement volumes, market shares, proprietary material declarations, and detailed product composition data — should be publicly accessible only in aggregated form. A single national register should apply even where several PROs or individual producer systems operate in a Member State, ensuring collection and recycling operators are not required to declare the same data in multiple formats or through multiple IT systems.

A harmonised EU registration and reporting framework should be established so that producers register once and report in one format across the Single Market, supported by interoperable national registers and datasets. Reporting frequency should be harmonised across relevant legislation to reduce administrative burdens and avoid adverse impacts on the internal market, particularly for producers active in several Member States and for SMEs.

Where collection is organised by a PRO, reporting may be submitted by the PRO on the collector's behalf, ensuring no new administrative burden falls on small operators.

6 A value chain coordination body in each Member State

A body bringing together in a balanced manner the main representatives of all actors in the WEEE value chain — producers and PROs; treatment operators and recyclers, including downstream smelting and refining operators, as well as downstream users of recycled materials; municipalities and collection point operators; retailers and logistics operators; and repair and preparation-for-reuse operators, including social enterprises — should be established in each Member State to coordinate flows, identify and resolve bottlenecks, issue recommendations,

monitor implementation, EPR system performance, and certification, coordinate awareness campaigns, and support the competent authority with data. Within the functioning of the system, this body may take decisions and coordinate actions to address these issues.

However, any commercial and contractual decisions, including the level and allocation of EPR fees, remain with the parties that bear financial responsibility (producers and PROs); enforcement powers remain exclusively with the competent authority. Conclusions of the coordination body should respect the internal management decisions of its members.

7 Closing the online free-riding gap

Online marketplaces play a central role in closing the online free-riding gap.

Therefore, online marketplaces must:

- verify the EPR registration of every third-party seller before enabling a listing, through suitable verification tools (such as automated checks against national producer registers or registration-number validation) supported by the interoperable national registers in line with point 5 of this paper; where a seller's EPR registration cannot be verified, the online marketplace should either refuse/remove the listing, or undertake the producer's WEEE obligations for the products concerned;
- offer, where mandated by a producer, EPR intermediary services (registration, reporting and fee payment on the producer's behalf) to support compliance and traceability, without transferring or diminishing the producer's own legal liability;
- ensure take-back arrangements for consumers equivalent to those applicable to physical retail, proportionate to the online marketplace's role and its own retail sales.

Where applicable, the role of the authorised representative should be preserved, carrying full legal, operational and financial responsibility for the producer's obligations in the Member State concerned.

8 Harmonised authorisation and transparency conditions for PROs

Every PRO should be authorised to the same core conditions across the Union: adequate financial guarantees, non-discriminatory membership terms open to all producers including SMEs, transparent and cost-reflective fee structures, and annual reporting on costs, collected volumes and achieved outcomes, together with clear rules on the authorisation of new entrants and on producer exit.

Where more than one PRO operates in a Member State, a coordination mechanism should allocate collection responsibilities, guarantee coverage of the entire national territory including unprofitable areas, and manage financial settlement between schemes.

9 Strengthened Enforcement with Member State accountability

Member States should be required to adopt a national WEEE compliance and enforcement programme covering key risk areas where non-compliance is concentrated, such as online free-riding, informal collection, illegal exports, unreported treatment, and non-compliance with treatment and safety standards. The programme should set minimum enforcement actions to be taken (e.g., inspection rates, audit expectations, and response timeframes for anomaly referrals) and should provide for structured cooperation among environmental, customs, and market surveillance authorities. Legislation should define the baseline resources and audit frequency Member States must maintain, ensuring enforcement capacity is a legal requirement rather than a matter of discretion.

Member States' performance against the programme should be reported to the Commission every two to three years in a structured, public, and comparable format. Where reports show systematic underperformance, the Commission should issue formal recommendations and consider appropriate follow-up actions.

10 Better link between the WEEE Directive revision and the ESPR

A clear link should be established between the WEEE Directive revision under the Circular Economy Act and the Ecodesign for Sustainable Products Regulation (ESPR), to ensure the two frameworks are consistent. At the same time, the two instruments address different objects — end-of-life management on one side, product design on the other — and should remain distinct in their regulatory approach.

The joint signatories look forward to working with EU policymakers to finalise an effective revised WEEE framework under the Circular Economy Act — one that ensures more WEEE is properly collected & recovered, kept within authorised channels, and recycled into high-quality secondary raw materials for European industry.

Co-Signatories

The following organisations from across the WEEE value chain support this paper:

APPLiA - Home Appliances Europe

DIGITALEUROPE



European Electronics Recyclers Association



European Heating Industry



European Partnership for Energy and Environment



European Metals



European Ventilation Industry Association



European Waste Management Association



Global Electronics Association



Information Technology Industry Council



LightingEurope



Europe's Technology Industries



PRONEXA



Recycling Europe



WEEE Forum