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Mrs. Ursula von der Leyen  
President European Commission  
Rue de la Loi 200  
B-1049 Brussels

**Subject: Recommendations on the EU's policy action and priorities regarding e-waste**

June 2020

Dear President von der Leyen,

Covid 19 will require us to make many changes to how we do things, but it should not deflect from what we wanted to achieve before it entered our lives so significantly.

In your first address to the commission, Mrs von der Leyen, you made many references to the environment and the importance of growing Europe with significant emphasis on integrating economic growth with the protection of our climate and environment. European Electronics Recyclers Association<sup>1</sup> (EERA) members share the same aspirations for the future.

Our members are in full support of you and can substantially demonstrate a proven track record of innovations and scale. Our industry needs your full support when it comes to maintaining and improving current directives that are so fundamental to the future of our businesses. Now is not the time to water down previous targets. Indeed, we would appreciate a more stringent enforcement of the objectives laid down in the WEEE Directive<sup>2</sup>. Maintaining collection and recycling targets is critical to the continued investments that are needed for Europe to achieve a level of self-sufficiency in the area of value added in our countries, which will have a positive impact on employment and growth.

Quality recycling of electrical waste in Europe should be encouraged to grow capacity by embracing the importance of its role in the circular economy. The volumes of WEEE generated in Europe are only going to increase. Significant quantities of critical raw materials and other valuable resources contained in WEEE need to be harnessed and kept in Europe. This can easily be brought about by recognising the importance of joined up thinking when it comes to new legislation.

Producers of Electrical and Electronic Equipment (EEE) should be encouraged to work with you on the Green Deal and Circular Economy Action Plan for Europe rather than request a relaxation of collection targets for WEEE and batteries

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<sup>1</sup> EERA: the voice of European WEEE recyclers [www.eers-recyclers.com](http://www.eers-recyclers.com)

<sup>2</sup> WEEE Directive Waste Electric and Electronic Equipment 2012/19/EU



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throughout Europe. Reducing the volume of WEEE available for recycling affects investment in capacity and technology.

In our view regulations concerning the use of plastics must be set out to encourage a vibrant reuse of all plastics in circulation whether this be reconstitution and reuse or energy recovery where it is necessary. Regulations for the removal of substances of concern must not get in the way of controlled movement and quality recycling of plastic waste within Europe. Our members are well qualified to manage post-consumer recycled plastics from WEEE. The attractiveness for producers of consuming only virgin plastics given the low oil price must be regulated and compulsory content of recycled plastics in new products be made mandatory. This is true circularity and has in our view the full support of consumers.

Our industry requires your support in establishing mandatory standards for the treatment of and resource recovery from WEEE. Creating a level playing field which encourages small and medium sized enterprises in every region to be involved, creating employment, and added value. Barriers which restrict or make impossible the regulated and controlled movement of waste within Europe could be removed giving every region access to the best available treatment capacity and technology of WEEE and plastics.

Mrs von der Leyen, our members will support you in every way to achieve your ambitious targets for reducing CO2 emissions, on your way to making Europe the first climate-neutral continent in the world by 2050. Our members will recover resources much needed for future generations and our innovations will be world-class.

All we ask for is full recognition of the work we do.

Yours sincerely,

Kurt M. Kyck

A handwritten signature in blue ink, appearing to read 'Kurt M. Kyck', written in a cursive style.

EERA President



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About EERA:

EERA, the European Electronics Recyclers Association, is a non-profit organisation that represents the interests of 30 major recycling companies treating waste electrical and electronic equipment (WEEE) in Europe.

The EERA members recycle  $\pm$  2.500.000 tonnes of WEEE annually at more than 100 locations in 22 European countries. EERA members are pre-processors and end processors.

EERA recyclers treat 1/3 of the total WEEE market. (2/3 disappears). The total WEEE market in Europe is 9-10 million tonnes of WEEE per year. The total turnover of EERA members is more than 1 billion euros.

EERA aims for the harmonisation of international and national regulations for WEEE recycling, in order to obtain a free market (level playing field) for demand and supply of services.

More info: Lida Stengs, [ls@eera-recyclers.com](mailto:ls@eera-recyclers.com) Website: [www.eera-recyclers.com](http://www.eera-recyclers.com)