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The revision of the Directive on waste electrical and electronic equipment (WEEE) and the upcoming Circular Economy Act

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RENAS is **Norway's leading compliance scheme for WEEE and waste batteries**, also offering producer compliance for packaging. We are a non-profit organisation and a member of the WEEE Forum at EU level.

To foster a robust market for secondary raw materials and support Europe's transition to a sustainable, resource-efficient and circular economy, we see a critical opportunity with the revision of the **WEEE Directive** and the upcoming **Circular Economy Act**. By setting clear and ambitious policies, EU policymakers can drive the collection, safe treatment, and recycling of valuable materials. In this context, we encourage EU policymakers to:

1. Include **new professional product groups in the scope of the WEEE directive**: E.g. **Industrial cables** (insulated electrical conductors or similar) and **industrial equipment** (electric motors, industrial machinery, medical equipment, stationary industrial tools, etc.).

2. Set out **material-based target** for recycling of critical raw materials, in accordance with the Critical Raw Materials Act (CRMA).

Background

In Norway, industrial cables and large industrial equipment are covered by national WEEE legislation, despite being outside the EU WEEE Directive's scope. These categories account for about **25% of Norway's electrical and electronic equipment waste collection**, with 13,995 tonnes of large equipment and 19,419 tonnes of cables processed under the **Extended Producer Responsibility** (EPR) scheme in 2023. Similarly, **France's** EPR schemes include professional electronic products, exceeding the EU WEEE Directive's requirements.

Revising the WEEE Directive presents an excellent opportunity to improve EU-level collection and safe handling of specific product groups with high recycling potential. These products contain higher concentrations of environmental pollutants compared to those currently covered by the directive. Including them would help **prevent and mitigate the environmental and health risks** associated with informal sector management.

EPR schemes represent a cost-effective method to gain better control of material flows, also ensuring longer life cycles and the **re-use of secondary materials.** The current volume-based recycling targets incentivise quantity over quality: The targets award recycling of materials that are easy to extract in large volumes, **while critical raw materials that are vital for high-tech industries, are neglected**. Material-specific targets would push the industry to recover these scarce resources, supporting Europe's **self-sufficiency**, reducing reliance on imports, and enhancing supply chain resilience.

This approach would better align with the ambitions of the Circular Economy Action Plan and the upcoming **Circular Economy Act**, as well as the **Critical Raw Materials Act**, which targets the Union to have domestic capacity to recycle at least 25% of its annual need for strategic raw materials by 2030. It also supports the **Clean Industrial Deal**'s goal for Europe to become the global leader in circular economy, with a target to raise the circular material use rate from 11.8% to 24% by 2030. Including these product groups into the WEEE Directive would offer clearer end-of-life guidance than current product-specific frameworks like Ecodesign for Sustainable Products Regulation (ESPR).

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Our argument

EPR is a success story, and producer responsibility organisations (PROs) play a significant role in achieving Europe´s climate and circular economy targets. Based on 25 years of responsible collection and handling of industrial cables and large industrial equipment, we believe that the inclusion of these product groups in the scope of the WEEE Directive will have a range of positive effects and can help **pre-emptively address future waste challenges** in the EU.

1. Addressing the expected increased demand for industrial electric equipment:

To achieve the ambition of becoming the first climate-neutral continent by 2050, legislations like the **Renewable Energy Directive (RED)** and **REPowerEU** will drive the shift from fossil fuels to clean energy. Increased **electrification will sharply raise demand for industrial cables and equipment** as we undertake electricity transmission projects to upgrade our grids. The **2023 EU Action Plan for Grids** highlights the need for new infrastructure to boost EU interconnection and link offshore renewable systems to the mainland grid. Europe faces major push to expand its energy grid infrastructure but should not miss the opportunity to ensure end-of-life responsibility measures are in place in a harmonized manner across the Union.

2. Strengthening the market for secondary materials in the EU:

If we project the Norwegian collection data onto the EU, there is clear evidence for a large untapped potential when it comes to collecting and recycling industrial cables and large industrial equipment at the European level.

Expanding the WEEE legislation scope and setting materials-based recycling targets for PROs will greatly help achieve the goals set out in the **Critical Raw Materials Act** (CRMA) in terms of both recycling and self-sufficiency.

The **high cost of treating** these product groups makes it challenging for facilities to sort this waste without access to EPR schemes. Excluding industrial cables and equipment from EPR legislation leaves recycling to profit-driven or informal recyclers, who lack incentives to manage pollutants safely or maximise material recovery. Our experience shows that, with strong cooperation from producers and enforced regulations, these product groups can be safely **collected, treated, and recycled at much higher rates**. As outlined in the **Competitiveness Compass**, the EU must establish lead markets and a robust regulatory framework that supports the circular economy, ensuring an efficient and sustainable green transition. This is crucial for **enhancing Europe's strategic autonomy** and securing a **resilient supply chain** for the future.

3. Addressing hazardous waste:

Industrial cables contain brominated flame retardants, oils and other pollutants, complicating recycling and risking high dioxin emissions during energy recovery. Many are disposed of as waste due to technical challenges and high costs, with some also containing hazardous lead levels. **EPR can incentivise proper treatment of lead and flame retardants** as hazardous waste, ensuring they receive approved treatment in line with **REACH** and **RoHS** regulations.

For more information:

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