

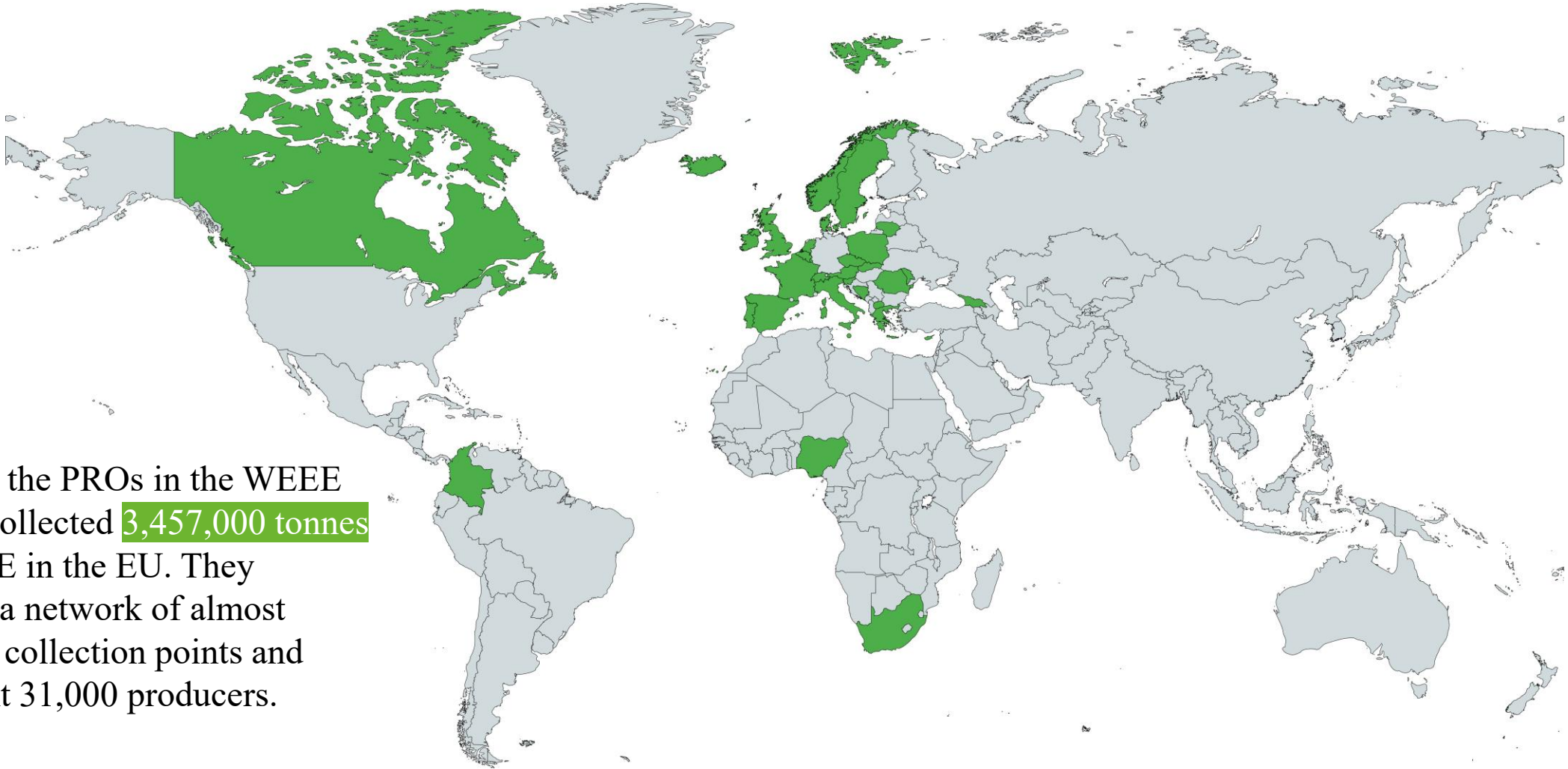
UNIDO ITU
E-waste in Latin America, 17 October 2025



EPR CHALLENGES IN A CIRCULAR ECONOMY FRAMEWORK

WEEE FORUM: THE WORLD'S LARGEST FAMILY OF PROS

Not-for-profit, WEEE management and mandated by producers



In 2024, the PROs in the WEEE Forum collected **3,457,000 tonnes** of WEEE in the EU. They manage a network of almost 200,000 collection points and represent 31,000 producers.

EPR CHALLENGES IN A CIRCULAR ECONOMY



EPR is expanding as a policy approach

CURRENTLY IN OUR AGENDA

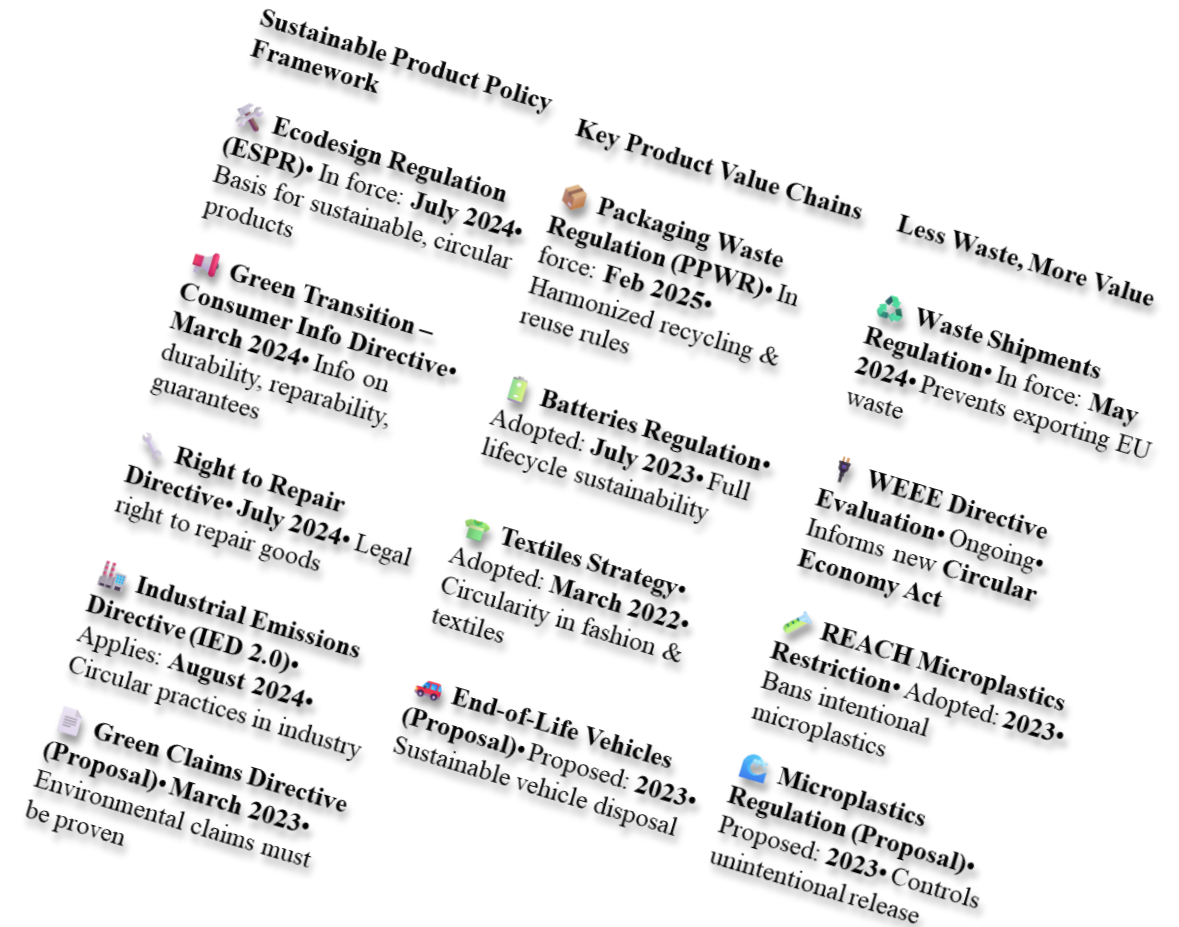
Towards the Circular Economy Act

- Legislative tsunami
- Circular economy act
- WEEE Directive revision
- Levy on uncollected WEEE
-

CIRCULAR ECONOMY ACTION PLAN

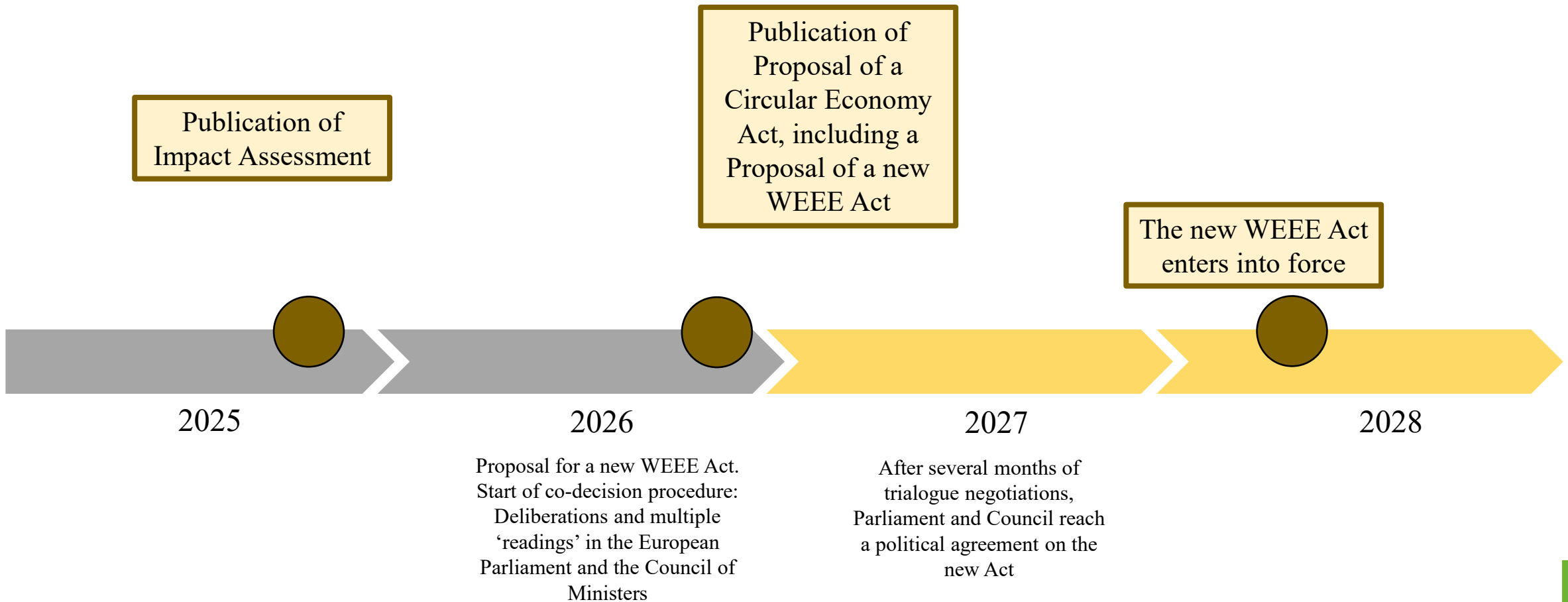
One of the main building blocks of the European Green Deal

- [Second Circular Economy Action Plan](#), adopted in March 2020
- includes initiatives addressing the entire life cycle of products: product design, waste prevention and use of resources within the EU economy for as long as possible.
- It introduces legislative measures



CIRCULAR ECONOMY ACT

Towards a WEEE review within the Circular Economy Act



CIRCULAR ECONOMY ACT

Proposal for a Circular Economy Act expected for late 2026

- End of waste criteria
- Harmonise, digitalise, expand EPR schemes
- Public procurement
- Recycled content
- Economic instruments to enhance collection
- Circularity of scrap metals
- CE business models
- Emerging recycling technologies
- Harmonise environmental tax bases
- Harmonise CRM recovery requirements
- Create demand for 2RM
- Expand scope to green transition equipment
- Review collection methodology, targets fit for purpose
- Harmonise treatment standards

- ▶ Accelerate the transition to circularity
- ▶ Efficient use and reuse of scarce materials
- ▶ Reduce global dependencies
- ▶ Create high-quality jobs
- ▶ 24% of materials to be circular by 2030

WEEE DIRECTIVE REVISION

The European Commission priorities

Scope of the Directive

The current scope does not adequately address new CRM-rich waste streams from renewable energy and digital technologies, such as wind turbines, which will reach the end of their lifecycles and be disposed of in the coming decades.

Collection of WEEE

In 2022, only Bulgaria, Latvia, and Slovakia met the 65% collection target of WEEE, based on the amount placed on the market in the previous three years. Economic factors, illegal trade, lack of infrastructure, and low public awareness were barriers to reaching the collection target. Additionally, differing interpretations and calculation methods further complicated collection efforts.

Recovery of CRMs

Low collection of WEEE results in a lost opportunity to recover valuable materials, in particular critical raw materials such as copper, rare earth elements, gallium, germanium or tungsten. Additionally, the current recycling targets in the Directive did not effectively encourage the recovery of secondary raw materials.

Lack of harmonisation of EPR schemes

The EPR is a principle that obliges manufacturers to manage and cover product end-of-life costs right from the design phase. The evaluation noted a fragmented implementation of EPR schemes across the EU and gaps in the enforcement of EPR obligations, particularly concerning online sellers.

Inconsistent treatment requirements

Although progress has been made in environmentally sound handling and proper treatment of WEEE, only about 23% of recycling facilities in the EU implement high-quality treatment standards. Improving the quality of recycling could help retrieve greater volumes of valuable secondary raw materials.

ROBUST MANAGEMENT GOALS THAT FOSTER CIRCULARITY

In a nutshell

Directive 2012/19/EU

"65% of the average weight of EEE placed on the market in the three preceding years in the Member State [...] or alternatively 85% of WEEE generated on the territory of that Member State."

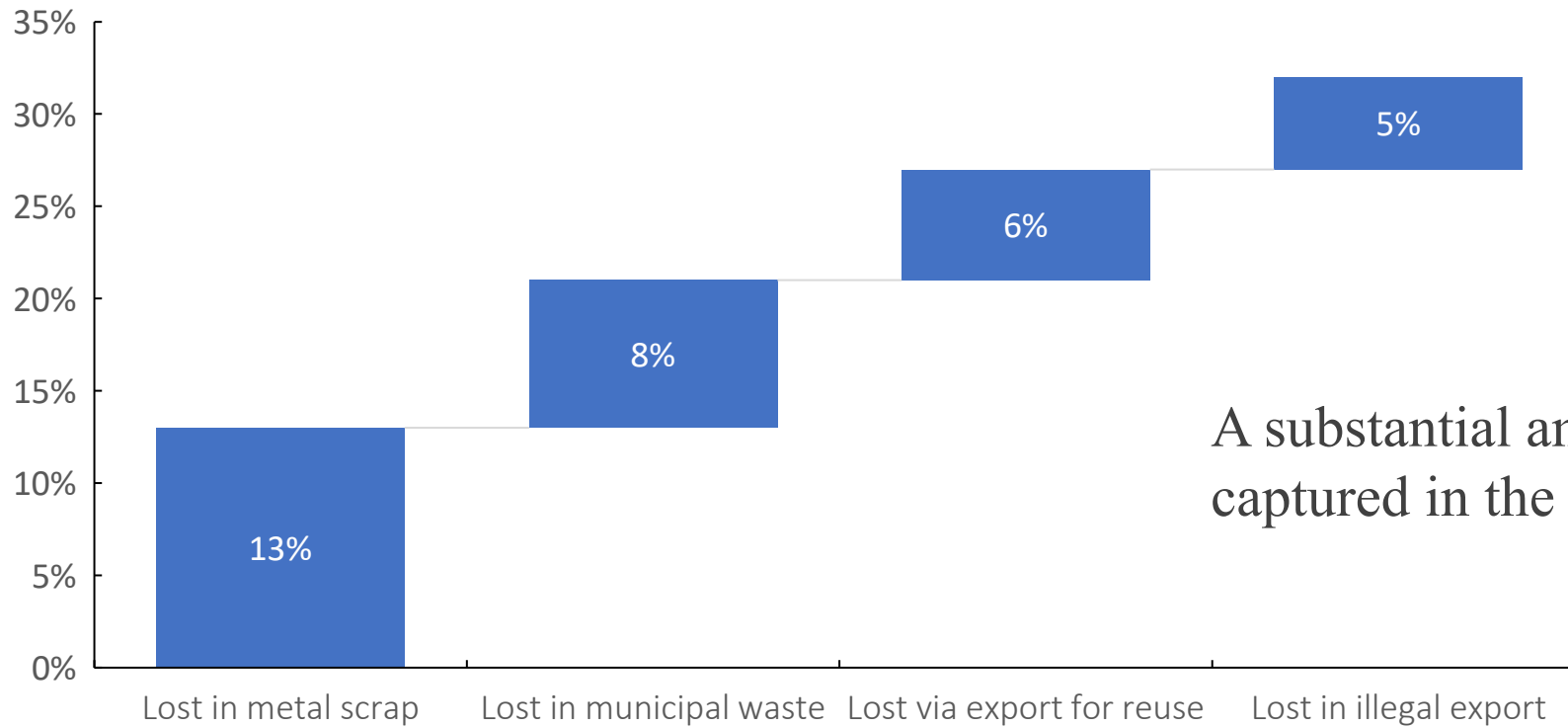
- Substitute collection target based on 'placed on market' method by WEEE generated method...
- ... and simplify it: lifetime distribution on category level.
- Periodically conduct EU-wide studies on lifetime of products.
- Introduce multiple benchmarks & targets beyond collected volumes, encouraging #circularity practices.
- Apply the #allactors principle: collaborative action among actors that have access to e-waste.
- Foster continuous improvement of ecosystem.



FLOWS

Complementary, parallel flows

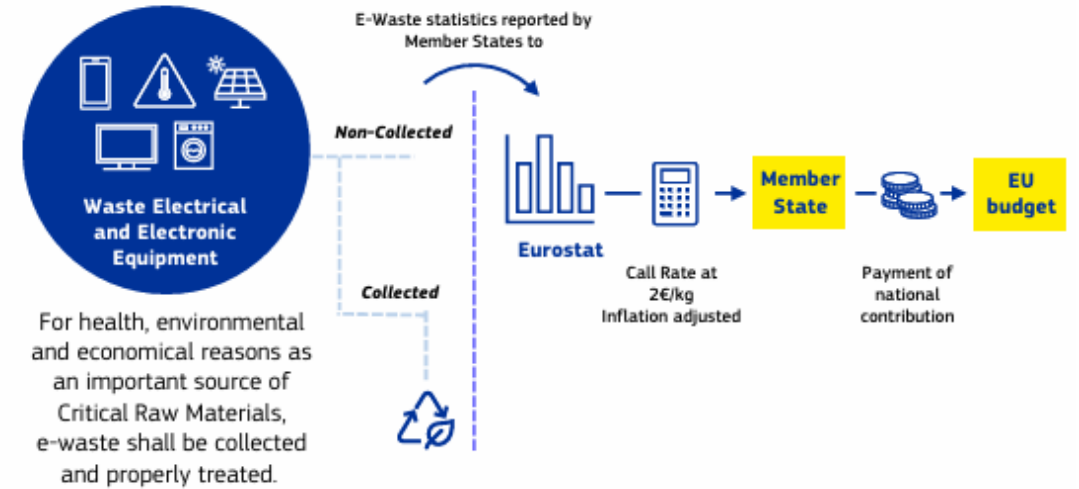
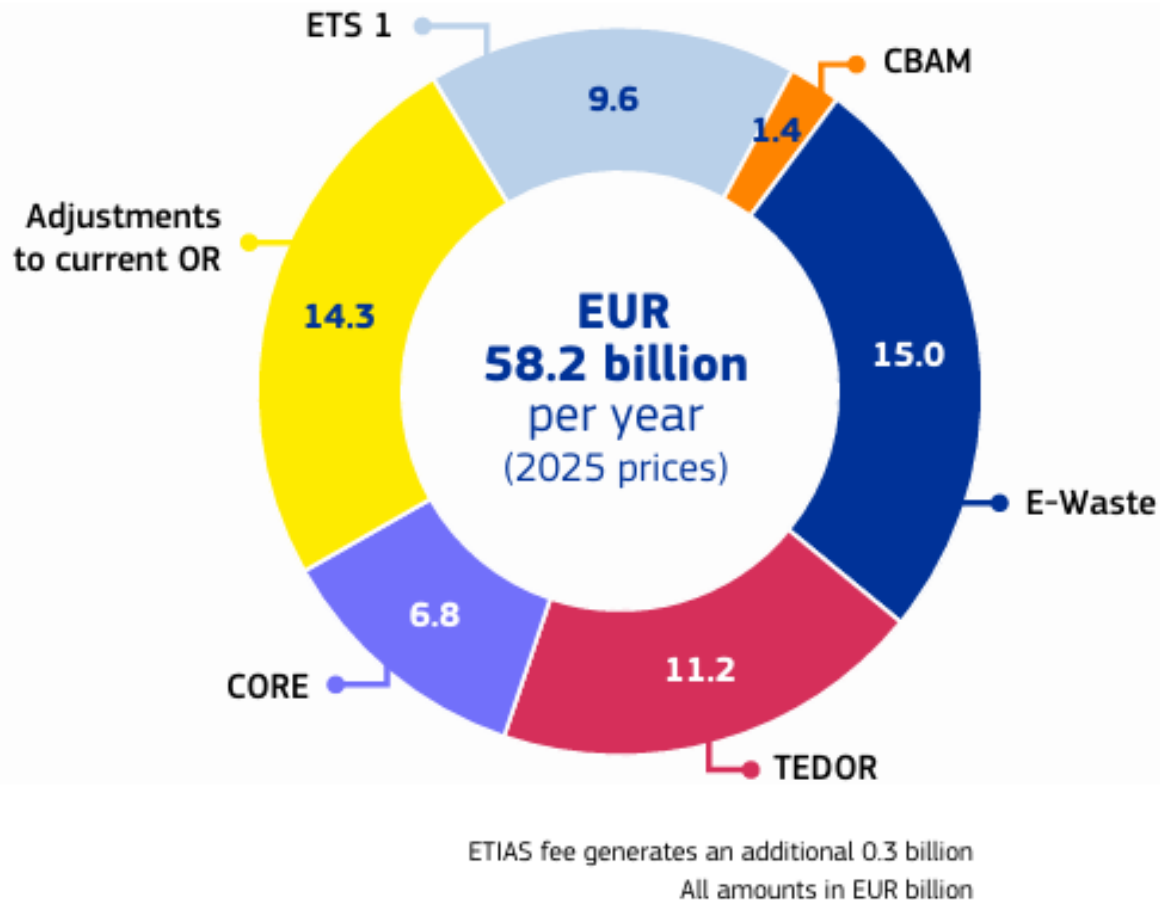
Complementary flows of WEEE generated, Europe (2021)



A substantial amount of e-waste is not captured in the formal collection systems.

LEVY ON UNCOLLECTED E-WASTE

A new Own Resource of the Multi-annual Financial Framework (MFF)



New Own Resource resulting from applying a levy of **€2/kg** to the weight of **uncollected e-waste**.

JOINT INDUSTRY PRIORITIES

The six most pressing challenges the Circular Economy Act should address

Suboptimal material
recovery compounded
by flawed WEEE
collection target
frameworks

Fragmented markets
hinder resource flow

Inconsistent quality of
recycled materials

Insufficient demand
for secondary
materials

Lack of consistent
enforcement

Regulatory complexity
and fragmentation

JOIN US IN DUBLIN NEXT YEAR

Clontarf Castle, Dublin, 17-18 September 2026

- Clontarf Castle, Dublin
- 17-18 September 2026





Thank you!

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