

Waste Framework Directive revision

Eurefas feedback

Eurefas, the European Refurbishment Association, welcomes the opportunity offered by the revision of the Waste Framework Directive.

As our members' purpose is to reduce waste generation by growing the second hand market for electronics, we fully share the Commission's purpose of limiting waste generation, increasing re-use, and increasing cost-efficient preparations for re-use and quality recycling.

The current initiative is a true opportunity to address major bottlenecks our sector is facing by growing access to used products to either refurbish, if in enough good shape, or "salvage" for spare parts. The point here would be to grow European supply for products and spare parts to be refurbished by market players such as our members, hence boosting the extension of the lifespan of products to the maximum, creating obvious environmental benefits.

With this objective in mind, we strongly recommend the Commission to work both on improving waste collection, and making sure recycling comes at the very end of a waste treatment process. Indeed, electronics waste collection – that is still too low today - should be improved through dedicated schemes. But in order for this collection to have a positive impact, refurbishment and preparation for reuse should be prioritized as step one in the collected product's treatment.

Through this revision, we recommend the Commission targets better alignment of reality with the waste directive hierarchy.

In order to achieve these objectives, several policy tools should be used:

- **Prioritize reuse :**
 - Build separate targets for reuse and recycling, in order to make sure dedicated reuse policies are put in place and avoid over focus on recycling.
 - Once done, build an ambitious target for reuse.
 - Mandate sorting and dismantling of any WEEE before recycling, in order to identify repairable products and useful recoverable spare parts, and make sure the refurbishment sector accesses it.
- **Extend the polluter pays principle to targeted responsibilities on the extension of products life through :**
 - Financing education campaigns on production environmental impact, importance of lifespan extension, existence of take back schemes and donation.
 - Boost take back and collection schemes of EEE and WEE by creating a "return bonus" for people.

- Streamline the EPR system by uniformizing it across the EU. Today, there are as many schemes as there are member states, which creates a lot of complexity and over-cost for companies like ours, that are mostly SMEs selling cross border, and leads to market entry barriers.

The revision of the Waste Framework Directive is a unique opportunity to tackle those challenges and foster a circular economy. Such a policy would come with huge additional benefits: improvement of European citizens' power of purchase, creation of growth and jobs in Europe and ensure the EU has better control over raw materials and manufacturing.