



Fédération Européenne des Activités de la Dépollution et de l'Environnement  
European Federation of Waste Management and Environmental Services  
Europäische Föderation der Entsorgungswirtschaft

16 June 2011

**FEAD Input to the EC Stakeholder Consultation on Policy Options as Regards Photovoltaic Panels In the Context of the Recast Directive 2002/96/EC on Waste Electrical and Electronic Equipment (WEEE)**

FEAD – European Federation of Waste Management and Environmental Services - is registered under the following identification number: 2157643512-49.

FEAD members are of the position that the WEEE Directive should, as a matter of principle, cover all EEE no matter how diverse the equipment is. There is no legal restriction on producers to establish their own individual schemes within the legal boundaries of this Directive. Inclusion in the scope of the Directive provides legal certainty, offers guarantees for continuity in time and ensures, in particular, that historical – and not only newly arising waste – will be treated properly. The full inclusion of all EEE in the scope of the Directive would also provide law-makers with the advantage of being able to better monitor the compliance with the environmental and health objectives of the Directive by the virtue of statistical measurement and reporting. For the waste management industry, full inclusion of EEE in the scope of the Directive is a driver for R&D and an incentive to invest in new treatment facilities, thereby accelerating the environmental benefits of proper waste management.

As a result of these considerations, we do not see any reason for the non-inclusion of all types of photovoltaic panels in the scope of the WEEE Directive. The treatment of end-of-life photovoltaic panels is similar, for instance, to the treatment of LCDs and the recycling of this sort of equipment provides valuable secondary raw materials. Conversely, the improper disposal of photovoltaic panels could lead to the leaching of lead and cadmium, loss of conventional resources such as aluminum and glass and also the loss of rare materials such as silver, indium, gallium and germanium.

Taking into consideration the different policy options outlined in the EC consultation document, FEAD strongly supports Policy Option B: *Inclusion of all photovoltaic panels in the scope of the WEEE Directive*. In our view, this is the policy option that will guarantee the highest level of environmental and health protection and will ensure that the costs associated with the treatment of this sort of WEEE, such as for the collection and recycling, are offset.

The full inclusion of photovoltaic panels in the scope of the WEEE Directive would also have further major positive effects: the reduced potential environmental impact of improper disposal and the generation of economic benefits resulting from the preservation of raw materials. Additionally, the social benefits of the larger quantity of recycled photovoltaic panels ought to be considered as this would mean the creation of green jobs in the European recycling sector.

FEAD is of the opinion that the “Study on photovoltaic panels supplementing the impact assessment for a recast of the WEEE Directive” draws an accurate picture of the situation. Although the study could not project all possible scenarios regarding the future of the recycling of photovoltaic panels due to the fast-paced development of technology, it incontrovertibly shows that the option of the full inclusion of photovoltaic panels would yield the highest net benefits for the economy.

According to the study, the estimated number of panels that will be accumulated by 2050 will amount to approximately 9,5 million tonnes in total. The study shows that the most recommended policy option (option B), which FEAD supports, would mean that only around 1,4 million tonnes of panels are not recycled by 2050

APOH, Slovakia  
ARS, Romania  
ASEGRE, Spain  
BDE, Germany  
CAOH, Czech Republic

DWMA, Netherlands  
ESA, UK  
EWMA, Estonia  
FEBEM-FEGE, Belgium  
FISE, Italy

FLEA, Luxembourg  
FNADE, France  
IWMA, Ireland  
KSZGYSZ, Hungary  
LASUA, Latvia

NORSK INDUSTRI, Norway  
PASEPPE, Greece  
PIGO, Poland  
SRI, Sweden  
VÖEB, Austria  
YYL, Finland

while according to the second best policy option (option A), 2 million tonnes of panels will remain not recycled.

In conclusion, it is important that full responsibility for the treatment of end-of-life photovoltaic panels is taken at European Union level through the inclusion of PV panels in the scope of the WEEE Directive in order to ensure uniform and high standards in the recycling of these materials.

*FEAD is the European Federation representing the European waste management industry. FEAD's members are national waste management associations covering 20 Member States and Norway. They have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion.*

*FEAD represents about 3000 companies with activities in all forms of waste management. These companies employ over 320000 people who operate around 2400 recycling and sorting centres, 1100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.*