



Waste Policy & Resource Efficiency Section,  
Department of Environment,  
Community and Local Government,  
Newtown Road,  
County Wexford.

13<sup>th</sup> November 2013

## **Consultation on Implementation of the WEEE Directive (2012/19/EU) in Ireland**

Dear Sir/Madam

The Irish Waste Management Association (IWMA) welcomes this opportunity to comment on the above referenced review of the WEEE Directive in Ireland.

The IWMA is the voice of the private waste management industry in Ireland. Our members are active in every county in Ireland and contribute to the management of waste at each level of the waste hierarchy. Our membership includes small, medium and large companies managing both hazardous and non-hazardous wastes, including WEEE.

With regard to the transposition of the WEEE Directive 2012/19/EU, we offer the following contribution.

Any legislative document that requires very high standards in waste collection, logistics and treatment of WEEE through Reuse, Recovery and Recycling is welcomed by the IWMA. Our members have invested substantially in Ireland's waste collection and treatment infrastructure and see the introduction of mandatory standards and their enforcement as key elements in securing those investments.

The IWMA supports the inclusion of the Cenelec standards (EN 50754 and EN 50625-series) in the regulations. This is provided for under Article 8.5 of the WEEE Directive 2012/19/EU. In the opinion of the IWMA the inclusion of standards will improve the quality of treatment, enforcement and curtail illegal export.

1. **Treatment:** The introduction of standards for the treatment of electrical waste for reuse, recovery and recycling will level the playing field for all operators by setting out minimum criteria to which operations must conform.
2. **Enforcement:** The inclusion of standards for treatment and reuse will greatly assist Enforcement of the new Regulations.
3. **Export:** In the event that WEEE is exported, the WEEE treatment processes of the receiving party must qualify according to the above mentioned EN treatment standards or to an equivalent if exported outside the Member States.

It is the opinion of the IWMA that the achievement of the higher collection and treatment rates as set out in Article 7 and 8 of the WEEE Directive 2012/19/EU will not be possible without ensuring that all properly treated WEEE streams are measured and reported to a robust, confidential registration system.

Yours sincerely,



**Conor Walsh**

Secretary

Irish Waste Management Association

7 Dundrum Business Park,

Windy Arbour

Dublin 14.