

Subject: Call to reject the Commission's proposal on the new own resource on based on non-collected e-waste

To:

Presidency of the Council of the EU
General Affairs Council
Members of the European Parliament

Cc:

Members of the Council Working Party on Own Resources
Members of the Ad hoc Working Party on the MFF

Date: 21 May, 2026

Dear Representatives of the Member States,
Dear Members of the European Parliament,

On behalf of the electrical and electronic equipment (EEE) industry, we are writing to express our profound concern regarding the European Commission's proposal to introduce a new category of EU own resources in the form of uniform call rate to the weight of non-collected electrical and electronic equipment amounting to €2/kg (referred in this letter as "e-waste levy"), as set out in the draft Council Decision on new Own Resources¹.

We consider this measure to be fundamentally flawed. It risks leading to significant market fragmentation and imposing disproportionate financial and administrative burdens, while lacking a robust and harmonised data foundation. For these reasons, **we strongly urge that the proposed e-waste levy be rejected.**

The proposed e-waste levy may appear to be a simple and environmentally sound solution, but its **reliance on national implementation will create several serious issues**. The measure follows a design similar to the contribution from Member States based on non-recycled plastic packaging waste (referred in this letter as "plastic tax") introduced under the previous Multiannual Financial Framework. It would be added on top of an already well-established policy framework set out in EU environmental legislation, notably the Waste Electrical and Electronic Equipment (WEEE) Directive. Mirroring the introduction of a uniform call rate applies to the weight of not recycled plastic packaging waste ("plastic tax" approach, which was introduced in addition to existing EU packaging waste frameworks), raises **grave concerns about the impacts of implementation:**

¹ Proposal for a Council [Decision](#) on the system of own resources of the European Union and repealing Decision (EU, Euratom)

- **Unreliable data**

Statistical data, such as Eurostat's current data on e-waste recycling and collection rates, are far from reliable, as acknowledged by the EU itself² and pointed out by stakeholders like the WEEE Forum³.

Figures for some Member States are unverified estimates that lack a consistent methodology. This disparity makes it impossible to implement the own resource fairly, risking the penalisation of countries or producers based on flawed or incomparable metrics. Furthermore, the method proposed in the draft Council Decision calculates "missing" e-waste by applying the widely challenged 3-years POM calculation methodology (see above). This methodology is likely to be amended with a planned new WEEE policy framework.

Because the actual amount of e-waste generated by consumers each year is an unknown variable, any such calculation is inherently uncertain. The proposal also assumes that uncollected e-waste is synonymous with improperly disposed e-waste, overlooking the significant portion of electronics that are exported before becoming waste or that remain in consumers' hands. Consumers frequently hoard devices for reasons such as data privacy or future repair, and until a product is discarded, it is not legally considered waste.

- **Questionable environmental incentives**

The European Commission proposes that the measure will deliver positive environmental outcomes and support strategic autonomy by incentivising waste reduction and collection. However, we are not aware of any impact assessment that substantiates these expected benefits.

The measure tries to serve both as an environmental incentive and a stable revenue source, but these goals are inherently incompatible: if it works environmentally, revenues will shrink; if revenues remain high, it means behavior is not changing. As designed, it is therefore either fiscally unreliable or environmentally ineffective, effectively turning ongoing regulatory failure into a permanent source of EU funding⁴.

Moreover, if passed onto economic operators, it risks producing the opposite effect by discouraging investment in waste management and recycling infrastructure, thereby undermining the EU's circular economy objectives. As a significant share of e-waste remains uncollected due to consumer behaviour, **EU policy should instead focus on encouraging longer product use through repair, reuse, and refurbishment.** The proposed measure fails to address these underlying behavioural causes.

² [Evaluation of the WEEE Directive](#), European Commission

³ [Towards more meaningful and robust WEEE management targets](#), WEEE Forum

⁴ [An alternative EU budget. How to Build a Better MFF Around the Single Market](#), EPICENTER

- **Increase of consumer costs**

The proposed new own resource category is formally levied on Member States and the Council Decision does not specify how they should finance it. It is likely, that the cost will be passed on through higher compliance costs and extended producer responsibility (EPR)⁵ as occurred with plastic tax. This, in turn would lead to the increase of costs by Producer Responsibility Organisations (PROs) and producers of electrical and electronic equipment (EEE). This would ultimately lead to higher costs for consumers. Under existing EU legislation (notably the WEEE Directive), producers already bear financial responsibility for the collection, treatment, and environmentally sound disposal of e-waste through PROs, costs which are already reflected in the product prices paid by consumers. Passing the proposed levy onto producers or PROs would introduce an additional consumption-based charge on essential electrical and electronic products, disproportionately affecting consumers with lower purchasing power.

- **Single Market barriers and fragmentation**

In line with the existing EU regulatory framework, manufacturers of EEE are already responsible for their products throughout their entire lifecycle. Introducing this levy on top of the current framework risks creating a fragmented landscape of national rules and tax rates across the EU. Experience with the “plastic tax” has shown that its implementation resulted in a patchwork of uncoordinated national and regional approaches, requiring significant effort from businesses - particularly those operating in multiple Member States - to understand and comply with divergent systems⁶. Such fragmentation creates barriers within the Single Market and generates additional administrative and financial burdens, running counter to the EU’s broader objectives of regulatory simplification and market harmonisation.

- **Regulatory overlap**

Introducing the levy ahead of the Circular Economy Act (CEA), which is expected to be presented in Q3 2026 to revise the WEEE Directive (likely changing the methods used for the calculation of the WEEE collection rate), risks creating regulatory overlap, inconsistencies and double regulation. Proceeding with a new levy in parallel and advance of this broader reform would be premature and could undermine the coherence of the EU regulatory framework.

- **Persistent legal ambiguity**

The e-waste levy risks becoming a permanent source of uncertainty for industry. Because Member States retain full discretion over its financing, there is profound unpredictability regarding the timing and mechanism by which these costs might be passed on, as clearly demonstrated during the rollout of the plastic levy. Such a lack of clarity significantly disrupts strategic investment and long-term financial planning.

In light of the above, we urge to **reject the proposed e-waste levy**.

⁵ [An alternative EU budget. How to Build a Better MFF Around the Single Market](#), EPICENTER

⁶ [Plastic Taxation in Europe](#) 2025, WTS Global

We stand ready to work constructively with policymakers and relevant stakeholders to identify effective and proportionate solutions that genuinely advance the circular economy, without penalising European consumers or undermining Europe's industrial base.

Yours sincerely,

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CCIA Europe

Digital Europe

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EUCOBAT

EucoLight

European Garden Machinery Federation

European Recycling Platform

ITI

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Orgalim

PRONEXA

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