

Appendix: Development of Rates for EEE and Lamps

Electrical and electronic equipment (EEE) and lamps must always be separately collected and recycled after being discarded. This ensures a safe waste chain, conservation of raw materials, avoidance of CO₂ emissions, and contributes to a circular economy (circular consumption). This is regulated through Producer Responsibility. With over 30,000 Wecycle collection points for consumers and businesses, as well as through incentive programs, Stichting OPEN fulfills this producer responsibility. This appendix provides a detailed explanation of the development of the rates that Stichting OPEN charges for this purpose.

The rates for all products are determined annually. This is based on an estimate of the costs involved in collection, sorting, and processing, as well as the quantity of products placed on the market. The key developments in costs are explained in this letter.

An increase in the amount of collected WEEE and lamps results in higher absolute costs for collection, sorting, and processing. Stichting OPEN aims for a higher (legally required) collection result and will also focus on increasing the collection volume in 2025. Naturally, a higher collection volume leads to higher costs. Stichting OPEN does everything possible to control costs and minimize the increase in the €/ton cost. For example, volumes are consolidated to achieve stronger purchasing positions with transporters, sorters, and processors, and more focus is placed on incentive programs for collection channels with lower €/ton costs.

Developments in regulations and compliance require Stichting OPEN to make investments in safety regarding the collection and sorting of EEE and lamps. In particular, requirements for collecting battery-containing devices are becoming stricter to ensure safety. An increasing share of collected devices contains integrated batteries, which leads to additional sorting costs. Furthermore, investments are needed in safe collection equipment.

A key component in the processing cost is the revenue from the raw materials recovered during the processing. These revenue prices are influenced by the global metal market. In recent years, there has been a downward trend, resulting in lower revenues.

Finally, rate developments from transporters, sorters, and processors lead to higher costs. The rates charged by transporters and sorters have risen, partly due to increases in minimum wages.

The amount of EEE and lamps placed on the market by producers/importers partially determines the rate due to the turnover system that is used. To determine the rate, the costs for collection and recycling are spread over the quantity of EEE and lamps put on the market in a given year. Therefore, not only the costs but also the quantity



of products placed on the market influence the rate. The following example illustrates this:

Example: The costs for collection, sorting, and processing remain the same, but the amount of products placed on the market (Put on Market, or 'PoM') decreases by 50%.

$$\frac{\text{Costs}}{\text{PoM}} = \text{rate} \quad \frac{1000}{100} = 10 \quad \begin{array}{l} \text{PoM decrease 50\%} \\ \frac{1000}{50} = 20 \end{array} \quad \text{Increase rate} = 100\%$$

From the example, it becomes clear that when costs remain the same but the quantity of products put on the market decreases, the rate increases. This is because the costs must be covered by a smaller quantity. For products that are being phased out, the amount of collected kilograms is generally high compared to the kilograms placed on the market. This results in a relatively high rate. For products that are new to the market, the opposite is true. The number of kilograms put on the market is often much higher than the number of kilograms collected. This results in a relatively low rate. In recent years, the amount of products placed on the market has decreased for some products. Partly due to the COVID-19 pandemic, high sales were realized in 2021 and 2022. The years after that saw a decline in the quantity of products placed on the market. As a result, the rates for some products have increased in recent years.

Stichting OPEN strives to relieve you of the burden of fulfilling your producer responsibility at the most optimal possible cost. We also continue to work towards creating a level playing field. Stichting OPEN maintains an active freerider policy to ensure that all producers participate and contribute to the environmental management fee, thus sharing the responsibility.

Thank you for the trust you have placed in us! Together, we have already processed 3 billion kg of electronic waste into new raw materials.

Household Appliances

In 2025, Household Appliances will switch to a rate per item for its products, excluding cooling and freezing appliances, instead of a rate per kilogram. The increase in the collection, sorting, and processing costs for Household Appliances can be almost entirely attributed to an increase in the collection volume. This leads to an increase in the rates. The products put on the market are assumed to be the same as in 2024. Additionally, surpluses were realized in 2021 and 2022 due to an increase in the quantities of products put on the market, causing the waste management contribution to exceed costs. These surpluses have largely been factored into the rates for 2023 and 2024, resulting in relatively low rates for those years. Given the reduction of surpluses through factoring in 2023 and 2024, only a small amount of



the remaining surpluses will be factored into the rates for 2025, which impacts the rate.

- For the categories E1/02, E1/03, E4/01, E4/02, E4/03, E4/04, E4/05, E4/06, E4/07, E4/08, E4/09, E4/11, E4/14, E5/01, E5/02, E5/03, E5/04, and E5/08, a per-item rate will apply from January 1, 2025.
- For category E1/01, the rate per kilogram will remain in effect.
- In 2025, a solution will be developed to introduce a per-item rate for category E1/01 by January 1, 2026.
- The rates will be evaluated on July 1, 2025, and adjusted if possible or necessary during the year.

Audio/Video

Rates for Audio/Video products will increase compared to 2024. The processing costs for CRT screens are rising due to reliance on a single processor. Additionally, the shift from cable to battery-powered products results in higher collection and sorting costs. Stricter regulations concerning the transport and storage of battery-powered products are also driving up costs. For 2025, the expected quantities of products put on the market are estimated to be nearly the same as in 2024. The cost increase, therefore, leads to a rise in the rate.

Other Categories

Rates for products in other categories are generally increasing due to a rise in the collection volume and the growing share of battery-powered products. The collection, sorting, and processing of these products is more expensive. Additionally, part of the volume is collected through Wecycle voor Bedrijven, and the incentive program has been successful. The accumulated surpluses/deficits from previous years are spread out and factored into the rates. This means that where a surplus exists, the rate increase is less than it would be in case of a deficit. In some product groups, the rate for 2025 is even lower than in 2024.

For product group E5/09, it has been found that there was an omission in the rate determination in 2023 and 2024. Instead of an increase, a decrease was implemented. This omission will be gradually corrected, but it will result in a substantial rate increase for 2025.

For the product groups related to ventilation and recirculation equipment (E4/12, E4/13, E5/06, and E5/07), a generic rate will be applied due to the wide variation and homogeneity.

ICT

In the ICT sector, the prices of raw materials always play a significant role. The price level for 2025 is expected to be lower than in 2024. However, the increase in the collection volume and stricter regulations on the transport and collection of battery-



powered products will lead to a further rise in costs. In 2025, there is expected to be a slight increase in the quantities of products introduced to the market. However, this will not prevent the rates for 2025 from increasing to cover the total costs.

Electric Tools

Rates for electric tools will increase in 2025 due to the rising collection volume. Additionally, the shift from cable to battery-powered products will result in higher collection and sorting costs. Stricter regulations regarding the transport and storage of battery-powered products will also drive up costs. In 2024, the rate was kept low due to the factoring in of the surplus accumulated in previous years. As a result, the rate was only € 0.08/kg, whereas the actual rate without factoring in the surplus would have been € 0.14/kg. In 2025, the rate will rise to € 0.19/kg, with no surplus left to factor in.

Lamps/Luminaires

Rates for lamps and luminaires weighing less than 750 grams will remain the same in 2025. However, the rate for luminaires over 750 grams will increase due to the higher costs associated with specific actions to increase the collection of these products. Part of this cost increase was offset by the surplus from previous years.

Solar Panels

Since July 1, 2023, the rate for solar panels has been set at € 0.04/kg for the remaining term of the AVV period through December 31, 2025. The quantity of solar panels on the market is significant, but due to their long lifespan, little collection has occurred so far. The rate of € 0.04/kg is being used to create an initial fund to cover future collection and processing costs. A level playing field is crucial for solar panels. In 2024, a campaign was conducted to approach installers who had not yet registered. In 2025, new projects will be defined in consultation with the industry to implement a targeted freerider policy.