



**BETRIBER
&EMWELT**
ENTREPRISES
&ENVIRONNEMENT

Webinar “Extended Producer Responsibility (EPR) - Electrical and electronic equipment (EEE)” (EN)

Online conference

19.03.2026 | 11:00-12:00



LUXEMBOURG
INSTITUTE OF SCIENCE
AND TECHNOLOGY



Administration
de l'environnement
Grand-Duché de Luxembourg

ecotrel
association sans but lucratif



LE GOUVERNEMENT
DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat
et de la Biodiversité

OPENING WELCOME BETRIEB&EMWELT

Caroline Fedrigo

Senior Environmental Engineer, Luxembourg Institute of Science and Technology

AGENDA

Timing	Title	Speaker
11:00	Opening welcome & presentation of Betriber&Emwelt	Caroline Fedrigo, Senior Engineer, Luxembourg Institute of Science and Technology (LIST)
11:05	Legal framework and obligations of EEE producers	Nadine Bertrand, Research Officer, Environment Agency (AEV)
11:25	The responsibilities and services of an accredited organization	Andy Maxant, Director, Ecotrel asbl
11:45	Q&A	
11:55	Conclusion	Caroline Fedrigo



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Platform on regulatory and
environmental information for
Luxembourgish companies

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LE GOUVERNEMENT
DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat
et de la Biodiversité

- * **Initiative** of Luxembourg Institute of Science and Technology (**LIST**) in partnership with the Ministry of the Environment, Climate, and Biodiversity (**MECB**) and the Environment Agency (**AEV**)
- * **Platform** on regulatory and environmental information for **Luxembourgish companies**
- * **Objective:** to raise awareness and inform proactively companies on regulatory or environmental topics
- * **Aim:**
 - Increase their regulatory compliance
 - Turning different environmental policies and requirements into an opportunity for innovation
- * **Free of charge activities** in collaboration with partners

PARTNERS



Administrations



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LIST



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- [MEILLEURES TECHNIQUES
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- [RESPONSABILITÉ ÉLARGIE DES
PRODUCTEURS \(REP\)](#)
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Betriber&Emwelt est une plateforme d'informations réglementaires et environnementales pour les entreprises luxembourgeoises





* Summary information



* Tools and guides



* Events



* News
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Chemicals & Environment Luxembourg

Page de communication du Helpdesk luxembourgeois REACH, CLP et POP, et de la plateforme Betriber&Emwelt.



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MEILLEURES
TECHNIQUES
DISPONIBLES

MANAGEMENT
ENVIRONNEMENTAL

LABEL SOLAR
IMPULSE
FOUNDATION

(DÉ)CONSTRUCTION ET
CIRCULARITÉ DES RESSOURCES

SUBSTANCES
CHIMIQUES

RESPONSABILITÉ ÉLARGIE DES
PRODUCTEURS (REP)



Equipements électriques et électroniques

En savoir plus



Emballages

En savoir plus



Batteries

En savoir plus



Produits du tabac avec filtre

En savoir plus



EPR
websection



EPR websection
Details of web
subsection



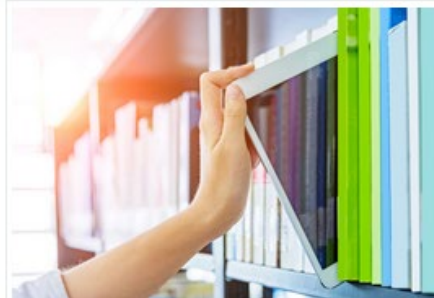
FAQ

En savoir plus >



Réglementation

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Contacts

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EVENTS (PRESENTATIONS, REPLAY) ON LINE

betriber-emwelt.lu

1

Ressources

2

Evènements

3

Archives

4

Année

The screenshot displays the website interface with a navigation menu at the top right containing 'ACTUALITÉS', 'ÉVÉNEMENTS', 'OUTILS', and 'NEWSLETTER'. Below the navigation, there are five main categories: 'COMMODO', 'MEILLEURES TECHNIQUES DISPONIBLES', 'MANAGEMENT ENVIRONNEMENTAL', 'LABEL SOLAR IMPULSE FOUNDATION', and '(DÉ)CONSTRUCTION ET CIRC RESSOURCES'. The main content area shows two event listings. The first listing is for a webinar on 'Déchets d'emballages non-ménagers/industriels : responsabilité élargie des producteurs (REP)' on 28.01.2025. The second listing is for a webinar on 'Restriction des substances dangereuses dans les équipements électriques et électroniques (Directive RoHS)' on 08.07.2025. On the right side, there is a 'Filtres' section with dropdown menus for 'Thématique' (set to 'Toutes') and 'Format' (set to 'Tous'), a 'Filtrer' button, and an 'Archives' section with a list of events by year: 2025 (12), 2024 (2), 2023 (2), and 2022 (10). A green arrow points from the second event listing to the 'Archives' section.

NEXT EVENTS

BETRIBER & EMWELT
ENTREPRISES
& ENVIRONNEMENT

Webinaire « Révision du système d'agrément » (FR)

Conférence en ligne

26.03.2026 | 10h00-11h00

Events

LUXEMBOURG
INSTITUTE OF SCIENCE
AND TECHNOLOGY | LIST

Administration
de l'environnement
Grand-Duché de Luxembourg

LE GOUVERNEMENT
DU GRAND-DUCHÉ DE LUXEMBOURG
Ministère de l'Environnement, du Climat
et de l'Énergie



CONTACT



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LEGAL FRAMEWORK AND OBLIGATIONS OF EEE PRODUCERS

Nadine Bertrand

Research Officer, Environment Agency



Administration
de l'environnement
Grand-Duché de Luxembourg



1. What is it about ?

- The principle of EPR (Extended Producer Responsibility)

2. Who is concerned ?

- Case of installers / repairers

3. Which types of equipments are concerned ?

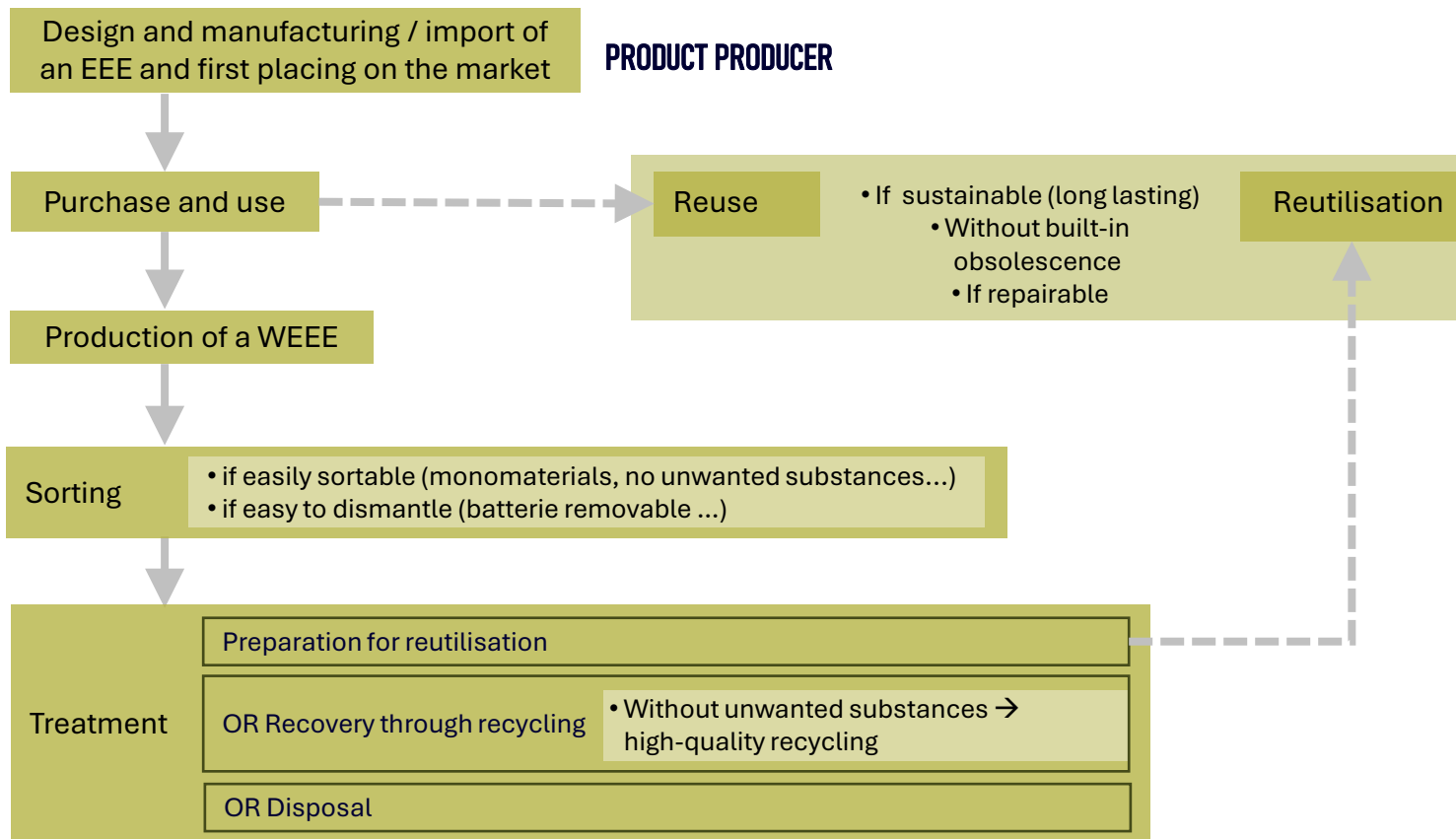
- Electric and electronic equipments (EEE)
- Waste of electric and electronic equipments (WEEE)

4. What are your obligations ?

5. How to comply ?



What is it about : the principle of EPR





What is it about ?

*# Rare resources
Critical raw materials*

*# Improved competitiveness
through increased independence*

*# Reuse &
remanufacturing*

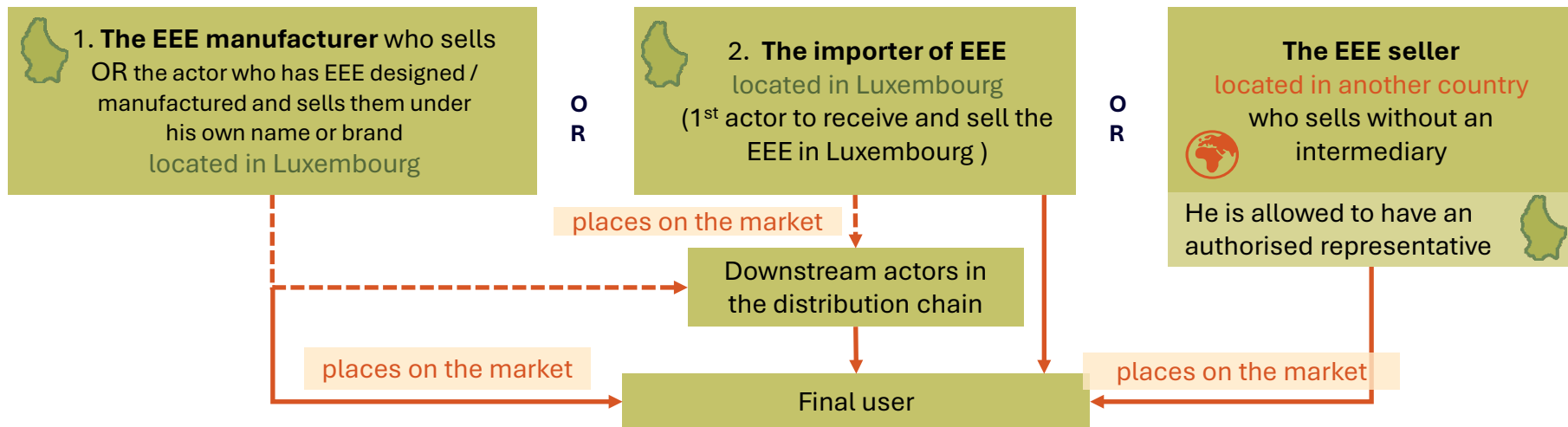
Security of equipments

- The actor **placing a product on the market** (here an EEE) makes him the **product producer**. He is responsible for the waste generated at the end of life of the product.
 - The explication is that this actor has an influence on the performance of the end-of-life management processes of his product.
 - That is why he bares the responsibility of this “end-of-life » part of the EEE.
- It is the principle of the **Extended Producer Responsibility** (EPR), which applies to following products :
- Electric and electronic equipments (EEE)
 - Batteries
 - Plastic filters for tobacco products
 - Packagings



Who is concerned ?

- For the authorities, it is essential that the actor bearing the EPR responsibility is located on Luxembourg territory whenever possible.
- Thus, the actor defined as the product producer – in this case, the producer of EEE – is :





Summary of who is concerned

You are the one placing on the market

If you are an EEE **manufacturer** and you place them on the market in Luxembourg

or

If you are the **1st importer** (= the one who receives) the EEE in the commercial chain in Luxembourg

or

If you **sell EEE by distance selling** from another country directly to users based in Luxembourg

Then **you are concerned.**

Legally, you are the “product producer” and you are subject to Extended Producer Responsibility (EPR).

You are a downstream actor in the distribution chain

You sell / install EEE in Luxembourg **but** you are neither a manufacturer nor the 1st importer in Luxembourg, as **you have a supplier / wholesaler in Luxembourg**

→ **Beware** : this supplier must be compliant

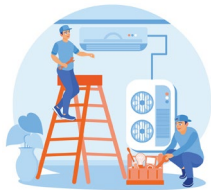
Then the manufacturer / 1st importer is considered the “producer” and is subject to Extended Producer Responsibility (EPR).

You are NOT CONCERNED.



Installers repairers

New EEE that you have placed on the market**
(for example, through import)



You are the actor placing this new equipment on the market.

You are concerned.
Legally, you are the “product producer” subject to EPR.

** This also applies to second-hand EEE that has been placed back on the market.

Defective EEE that you did not place on the market



- It is the responsibility of the **actor who placed this initial equipment on the market** to ensure its treatment (at least financially, for professional EEEs*).
- If the “former” actor who placed it on the market does not take care of it, then the client must do so. The client may ask you to handle it. In that case, you can treat this EEE as a “normal” waste generated by your activity, and **may invoice this “waste” service.**

* The client must check the conditions set out in the initial sales contract for their professional EEE.

Replacement of the defective EEE

Repair of the defective EEE

The same EEE that you fixed



You are **not concerned** by EPR for that equipment.

- **BEWARE** : if you have installed new electrical / electronic parts as part of this repair, you are responsible if you are the 1st actor placing them on the market..



Which equipments are concerned?

- The law of 9 June 2022 on WEEE specifies which types of equipment it applies to

- **The concerned electrical and electronic equipments :**

- All EEEs used by households 

- All EEEs used by professionals but commonly used by households



- All EEEs installed by a professional that are commonly used by households



- including photovoltaic panels



**Household equipments
(«dual use»)**

- All EEEs exclusively intended for a professional activity



- All EEEs installed by a professional that are exclusively intended for a professional activity



Exclusive professional equipments



What are your obligations ?

They are set out in the law of 9 June 2022 relating to waste from electrical and electronic equipment.



Register with the AEV in the producers' register



Set up a waste-management system for WEEEs



Finance your management system

- free take-back of WEEEs from “dual-use” households

Collection rate:
65% of the EEE placed on the market



Meet the required collection rates and recovery targets



Carry out the awareness-raising actions required by law
Carry out the marking of EEEs



Provide the AEV with an annual report quantities of EEEs placed on the market and the waste managed



How to comply ?

To comply :

For producers of “dual-use” households EEs	For producers of EEs intended exclusively for professional use	
Obligation to use the	Choice between the	
collective system → become a member of a Producer Responsibility Organisation	collective system → become a member of a Producer Responsibility Organisation	individual system → granting of an individual ministerial approval

- **Each to his own trade:** a Producer Responsibility Organisation has been created specifically by EEE producers to take charge of their legal obligations.
 - In Luxembourg, the only PRO for EEs is the non-profit association Ecotrel.
- **In the case of an individual system:** the approval contains all your obligations.
 - This approval must be requested from the Environmental Administration: deee@aev.etat.lu



And finally...

- A producer located outside Luxembourg who does not join a PRO may appoint an authorised representative located in Luxembourg.
- Distributors of EEEs also have an obligation :

the obligation of free take-back of WEEEs

- 1-per-1 when selling an EEE (equivalent equipment)
- For EEE sales areas > 400 m²: take-back of small EEEs without any purchase obligation (1-per-0)
- **BEWARE** : you may be both a producer and a distributor.
You must then comply with the obligations of both roles.



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Grand-Duché de Luxembourg

Contact

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Unité Stratégies et concepts

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www.emwelt.lu | www.aev.gouvernement.lu

 data.
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luxembourgeoise 



**Thank you
for listening**



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THE RESPONSIBILITIES AND SERVICES OF AN ACCREDITED ORGANIZATION

Andy Maxant

Director, Ecotrel asbl



Extended Producer Responsibility (EPR)
Waste Electrical and Electronic Equipment (WEEE)

Preamble



- 1994: Packaging Directive
- 2000: End-of-Life Vehicles (ELV) Directive
- 2002: WEEE Directive + RoHS Directive
- 2006: Batteries and Accumulators Directive



History of WEEE

- 2005: Publication of the Grand-Ducal Regulation of 18 January 2005 transposing two Directives (WEEE + RoHS)
- 2013: Publication of the Grand-Ducal Regulation of 30 July 2013 transposing Directive 2012/19/EU
- 2022: Publication of the Law of 9 June 2022 on waste electrical and electronic equipment (WEEE), highlighting reuse.

Second-hand equipment is subject to the same obligations as producers of new EEE.



Legal Framework

- **Obligations for producers and importers:**
 - Registration with the Ministry of the Environment, Climate and Biodiversity
 - Provision of a financial guarantee for future WEEE
 - Financing of historical WEEE on a pro rata market share basis
 - Obligation to delegate to a producer responsibility organisation (PRO)
- **Obligations for distributors:**
 - Take-back free of charge and without obligation to purchase for WEEE smaller than 25 cm, where the sales area exceeds 400 m²
 - One-to-one take-back obligation for all WEEE upon purchase of a new EEE
- **Obligations for municipalities:**
 - Free acceptance of WEEE from households
 - Free acceptance of WEEE from distributors within the framework of their one-to-one take-back obligation
 - Relations between public selective collection infrastructures and producers are governed by a national environmental agreement
- **Obligation for the State:**
 - Collection rate of 65%



Who is concerned?

- Law of 9 June 2022 on waste electrical and electronic equipment (WEEE):

***“Producer of products”:** any producer of EEE within the meaning of Article 4, point 33, of the Law of 21 March 2012, including persons who have EEE designed or manufactured in Luxembourg and market them under their own name or their own trademark in Luxembourg, and excluding persons who exclusively provide financing under or in accordance with a financing agreement unless they also act as a producer within the meaning of the definition of producer of products.*

- Legally, producers established in Luxembourg, as well as companies located abroad that sell directly to Luxembourg end users, are required to register.
- The first importer placing products on the Luxembourg market and selling directly to Luxembourg end users must register.



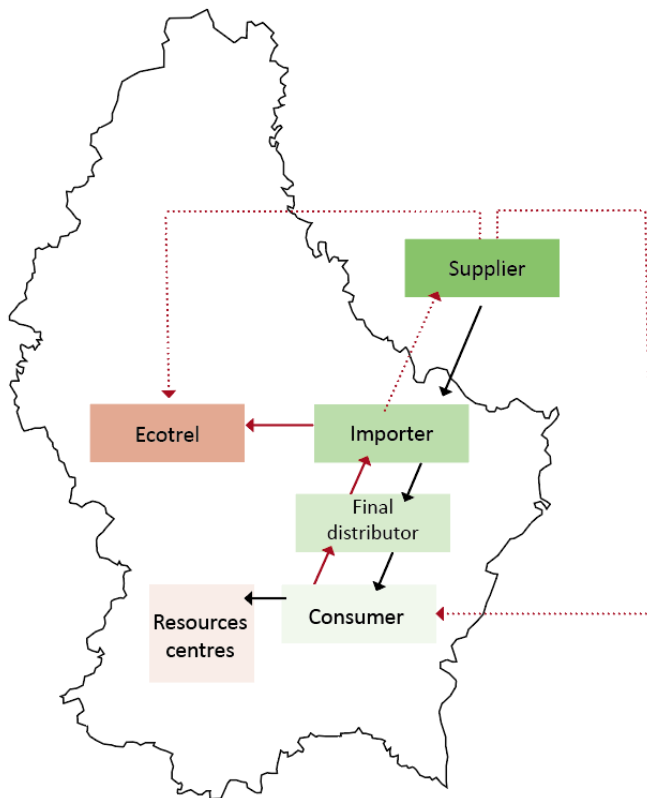
Ecotrel

- Producer Responsibility Organisation (PRO) approved by the Ministry of the Environment, Climate and Sustainable Development to assume the obligations of producers and importers of household and dual-use electrical and electronic equipment (EEE)
- Non-profit organisation (ASBL)
- Established in 2004
- More than 940 members
- Extension of Ecotrel ASBL's ministerial approval in October 2023: Ecotrel assumes the reporting obligations of producers of professional electrical and electronic equipment
- Partial individual approval for non-household WEEE
- More than 7,790,000 household EEE placed on the market in 2025
- More than 6,570 tonnes of WEEE collected in 2025



Financing

- The financing of Ecotrel ASBL's activities is ensured through the collection of a recycling fee included in the sale price of EEE when they are placed on the Luxembourg market.



Scope

- Ecotrel is responsible for the management of household/dual-use WEEE.



- Non-household WEEE are subject only to a service agreement with Ecotrel.



Collection categories

- Refrigerators and air conditioners:



- Oil-filled radiators:



- Lighting equipment:



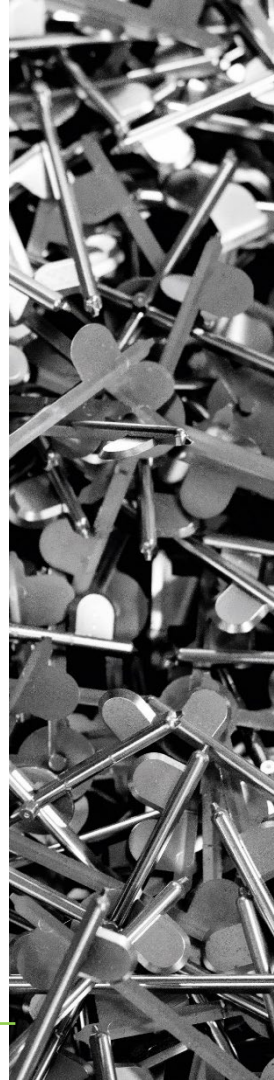
- Large household appliances (white goods):



- Screens:



- Small household appliances:



Collection

- Free take-back for professionals:
 - Two sorting centers
 - SDK in Colmar-Berg
 - Lamesch in Bettembourg

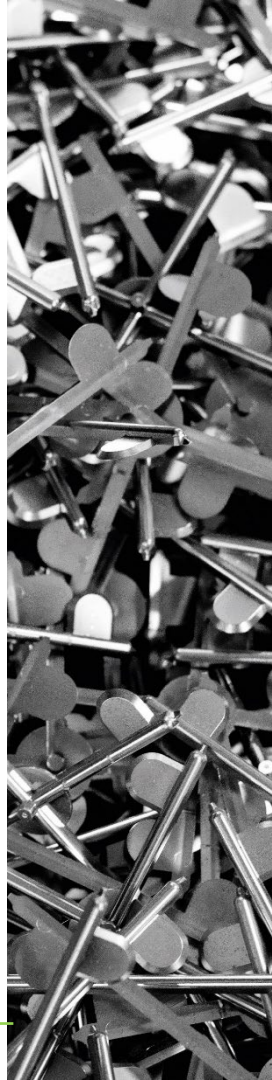
- Free take-back for households:
 - Resource centers
 - www.e-collect.lu: this website allows users to search for available take-back options within a municipality

- Approved collectors
 - [List of approved collectors](#)

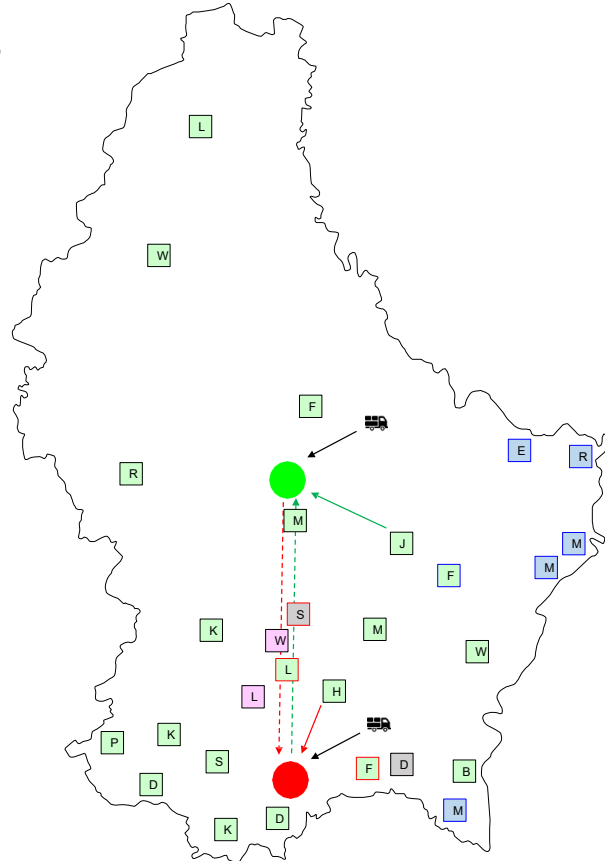


Collection

- Collection systems:
 - Approved collectors
[What to do with old devices? | Ecotrel](#)
 - Approved social service providers
[What to do with old devices? | Ecotrel](#)
 - Special collection by the municipality



Logistics structure



Logistics structure

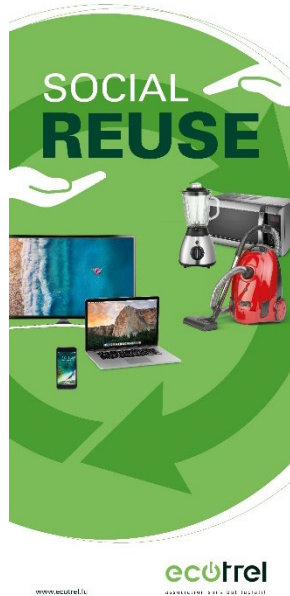


Best practice (manual disassembly)



Social ReUse Project

- Project start date: 15 November 2018
- Duration of the pilot project: 2 years



Social ReUse Project

Participating resources centers



01. Centre de ressources Junglinster
02. SIGRE
03. Centre de ressources Munsbach
04. Oeko-Center Hesperange
05. Centre de ressources Schifflange (SIVEC)
06. Centre de ressources « Am Haff »
07. Centre de ressources Pétange
08. Mondorf
09. Centre de ressources Tétange / Rumelange (STEP)
10. Centre de ressources Bettembourg / Dudelange (STEP)
11. Eco Center Bascharage
12. Centre de ressources Fridhaff (SIDECC)
13. Centre de ressources Lentzweiler (SIDECC)
14. Centre de ressources Mersch (SIDECC)
15. Centre de ressources Redange/Attert (SIDECC)
16. Centre de ressources Ecotec
17. Centre de ressources Frisange
18. Collectes mobiles de la SuperDrecksKëscht





The Ecotrel team is here to help if you have any questions.

QUESTIONS & ANSWERS

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SATISFACTION SURVEY



What is your opinion?

VILLMOOLS MERCI FIR ÄR PARTICIPATIOUN !

VIELE DANK FÜR IHRE BETEILIGUNG !

MERCI POUR VOTRE PARTICIPATION !

THANK YOU FOR YOUR PARTICIPATION !