DIGITALEUROPE

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Realigning targets and practices for effective e-waste management

Executive summary

DIGITALEUROPE members are leading innovation in electrical and electronic equipment (EEE). However, the rising environmental challenges related to the management of waste electrical and electronic equipment (WEEE) demand modern solutions that can keep up with technological advancements.

This paper provides key recommendations for revising the WEEE Directive,[1] ensuring it remains fit for purpose in supporting sustainability goals whilst addressing practical industry realities. Our key recommendations are to:

- **Shift to a collection target based on WEEE available for collection**: The current 65 per cent target, based on EEE placed on the market (POM) over the previous three years, does not account for the longer lifecycles of modern EEE products, nor the second-hand market. We recommend moving towards a target that better reflects actual WEEE generation, leveraging the WEEE calculation tool already developed by the Commission. This tool should be further refined to consider product lifespans, unofficial collections and legal exports for reuse.
- **Establish an EU-harmonised methodology**: A centralised, harmonised methodology for calculating WEEE available for collection will ensure consistent and fair target setting across Member States. By aligning the WEEE Directive with broader EU regulations like the Ecodesign for Sustainable Products Regulation (ESPR),[2] the EU can create a cohesive system that encourages environmental responsibility and compliance.
- **Oblige all actors to report on WEEE collection**: The 'all actors' principle is crucial for ensuring transparency and accountability across the entire WEEE management chain. All entities involved in handling WEEE – producers, recyclers, refurbishers and others – must be legally

[1] Directive 2012/19/EU as amended by Directive (UE) 2024/884.

[2] Regulation (EU) 2024/1781.

DIGITALEUROPE
Rue de la Science, 37, B-1040 Brussels
T.+32 (0) 2 609 53 10 / www.digitaleurope.org / @DIGITALEUROPE
EU Transparency Register: 64270747023-20

required to report the volumes they manage, preventing unofficial streams from escaping proper recycling and recovery systems.

- **Set minimum logistics and treatment standards**: Harmonised standards for WEEE collection, transportation and treatment, aligned with CENELEC guidelines, are essential to ensure high-quality recycling and a reduction in dependency on virgin raw materials. This would also enhance the recovery of secondary raw materials, critical for the EU's circular economy.
- **Re-examine WEEE categories for greater precision**: Current WEEE categories do not adequately reflect the diverse lifespans and technical characteristics of various EEE types. More granular categories, particularly within large equipment, will enable tailored collection targets and more efficient waste management.
- **Streamline reporting requirements**: Reporting obligations should be harmonised across the EU to eliminate unnecessary burdens on producers and enhance the comparability of data. A standardised WEEE reporting template would reduce administrative complexity and improve data quality.
- **Adopt digital labelling to replace the crossed-out wheelie bin**: The outdated crossed-out wheelie bin symbol should be replaced with digital labelling, such as QR codes, providing consumers with actionable information on how to recycle their products.
- **Prohibit WEEE fee eco-modulation and visibility**: National schemes that introduce WEEE fee eco-modulation lack harmonisation and create market distortions. Such practices should be prohibited as should the visibility of WEEE fees for ICT products, which adds unnecessary administrative burden without demonstrable environmental benefits.
- **Maintain open scope but careful product allocation**: The current 'open scope' should be maintained, ensuring that innovative products are carefully assigned to existing or new EEE categories without expanding the scope unnecessarily.
- **Avoid new product design requirements**: The revision should not introduce additional product design requirements, which are already covered by the current and future ecodesign regulations. This will prevent regulatory overlap and confusion whilst focusing the WEEE Directive on its core aim of improving waste management.

By incorporating these changes, the revised WEEE Directive can better reflect current technological realities, drive sustainable waste management practices, and support the EU's broader environmental objectives without creating undue burdens on industry stakeholders.

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Changing the calculation method from ‘placed on the market’ to ‘available for collection’

On 25 July 2024, the European Commission decided to open an infringement procedure by sending letters of formal notice to most Member States for failing to meet waste collection and recycling targets.[3] All Member States, except for Bulgaria and Slovakia, failed to collect sufficient WEEE separately, therefore missing the EU collection target. The Commission has called on Member States to boost their implementation efforts to meet the WEEE collection targets.

DIGITALEUROPE has strong concerns on the attainability of the WEEE collection targets with the current method of calculation. The setting of the collection targets expressed as a ratio of the volumes of EEE placed on the market of each Member State during the previous three years should be revised.

Targets should be set based on WEEE available for collection. The collection target of 65 per cent, based on the average of the previous three years’ ‘placed on market’ (POM) weight, is not a realistic, meaningful or achievable target. The WEEE generated each year is not typically arising from EEE sold in the previous three years.

The generation and collection of WEEE is affected by several factors, such as product lifespans, consumer behaviour, technological developments, unofficial (non-reported) waste collection, illegal exports of WEEE and legal exports of used EEE for reuse, which may be different and impactful depending on the type of EEE. Most electronic products have a significantly longer lifespan than three years considering manufacturer efforts to build durable products, and enable a circular economy with repair, reuse and refurbishment. Therefore, we must move away from setting the collection targets as a certain percentage of POM volumes and towards a target expressed as a high percentage of WEEE available for collection.

Member States’s choice to use an average of the previous three years’ POM-based volumes for WEEE collection targets can be attributed primarily to the simplicity of calculation. The POM-based approach relies on historical sales data, which is typically more accessible and straightforward to calculate. This ease of calculation is appealing for Member States as it reduces administrative complexity and the need for extensive data collection or analysis.

However, whilst the POM-based targets are easier to calculate, they are not attainable in practice, as only a tiny fraction of WEEE generated today comes from EEE placed on the market during the last three years. Increased longevity and durability within IT products is a key commitment our members are making in order to drive towards a circular economy. There is also a flourishing second-

[3] https://ec.europa.eu/commission/presscorner/detail/EN/inf_24_3228.

hand market for IT products. As a result, EEE products have a longer lifespan than just three years. This needs to be considered when setting WEEE collection targets.

The Commission should change the calculation method from 'EEE placed on the market' to 'WEEE available for collection,' which would allow to set higher, more meaningful and more realistic collection targets. To calculate the volumes of WEEE available for collection, we recommend using as a basis the existing WEEE generated calculation tool developed by the Commission. This tool must be further developed to more accurately reflect the waste available for collection. To this end, the tool must take into account all the parameters affecting the availability of WEEE for collection, i.e. the POM volumes during the last years (the tool already allows to input POM volumes for past periods much longer than three years, so as to correspond to product lifespans), the lifespan of each product category (at the granularity level already provided in the tool), the estimated percentage of unofficial (non-reported) waste collection, the estimated percentage of illegal exports of WEEE and the tonnage of exports of used EEE for reuse.

EU-harmonised methodology for calculation of 'WEEE available for collection'

The argument for a centrally defined, harmonised methodology for calculation of WEEE available for collection across the EU is based on the need for consistency, fairness and effectiveness in the management of WEEE across the EU. By avoiding national disparities and ensuring alignment with broader EU regulations such as the ESPR, the EU can create a more efficient and equitable system for managing the environmental impact of electronic products.

Here's an elaboration on the key points to be considered whilst defining lifespan at the EU level:

- **EU harmonisation is essential***:* Allowing each Member State to define the values of the parameters affecting the volumes of WEEE available for collection, including product lifespans, based on their own statistics could lead to significant disparities in how collection targets are calculated and, consequently, how compliance is measured. Such discrepancies would undermine the effectiveness of the revised WEEE Directive by creating an uneven regulatory landscape where the same product is treated differently across borders.
- **Product category-level lifespan***:* Lifespan definitions should be set at the product category level (e.g. TVs, smartphones, laptops and refrigerators) rather than at a more granular level, which could lead to unnecessary complexity and variability. The categorisation of products should consider EEE usage when defining the category levels, and include segregation between business to consumer (B2C) and

business to business (B2B). This approach is simpler and more practical, and aligns with the nature of electronic products, which typically have similar lifespans within their categories.

- **Conducting a study on average product lifespans**: A study to determine average product lifespans should be reflective of conditions across all Member States, ensuring that the resulting lifespan figures are truly representative of the entire EU. This could involve averaging national statistics, but with the final decision made centrally to ensure harmonisation.
- **Alignment with ecodesign regulations**: Any product's lifespan defined under the WEEE Directive should align with the lifespan established under the ESPR based on harmonised life-cycle assessment methodologies. This alignment avoids conflicting requirements and ensures that all environmental regulations are working towards the same goals.
- **Industry involvement***:* it is crucial for the development of these harmonised lifespans to involve consultation with industry associations. This ensures that the regulations are practical, industry-informed and considerate of the technical realities of product design and lifecycle management.

'All actors' principle

'Producers' of EEE in the EU have set up their own collective systems, known as extended producer responsibility (EPR) systems or producer responsibility organisations (PROs), to comply with their 'producer' obligation for the end-of-life management of the products they place on the market. The PROs financed by producers take over the operational responsibility for the collection and treatment of WEEE and additionally the reporting responsibility for volumes of WEEE collected per WEEE category.

However, WEEE is a valuable source of secondary raw materials, and therefore unofficial/unauthorised actors attempt to collect and commercialise it. As a result, a considerable portion of the WEEE generated is collected by unofficial/unauthorised actors – not permitting these WEEE volumes to be appropriately channelled into official waste streams, treated and reported by the authorised WEEE recyclers assigned by PROs. Apart from the implications this has on WEEE collection targets, most significantly it leads to substantial volumes of WEEE not finding the way to authorised recycling facilities, leading to loss of secondary raw materials which would otherwise be used to produce new EEE.

All the actors involved in the management of WEEE have a role to play so that WEEE is properly collected, treated, recorded and accounted for. In this context, all the concerned actors must be required to register themselves and report the volumes of WEEE they collect, recover and/or recycle. Such a

system will need to ensure that no double-reporting/accounting takes place when the data is compiled and assessed.

In addition, longevity by design and long software support has been leading to a flourishing second-hand market, incentivised by EU policy, which prolongs the life of products through repair, reuse and refurbishment. All actors taking part in these circular economy activities need to be involved in reporting as their activities also influence the volumes of WEEE available for collection.

To effectively mandate that all actors involved in WEEE management report on the volumes of WEEE they handle, a comprehensive legal framework should be established. This framework would need to address registration, reporting and enforcement mechanisms whilst ensuring that existing practices and certifications are respected and future tools, which are currently under development, are integrated. Here's how such a system could look like:

- **National registration requirement**: All actors handling WEEE and used EEE, including manufacturers, importers, distributors, retailers, repairers, refurbishers, second-hand marketplaces, collectors, recyclers and exporters, should be legally required to register in a 'national WEEE register.' This registration would create a centralised database to track all entities involved in the WEEE management chain. The registration could be tied to obtaining or renewing business licences, ensuring that no actor operates without being recorded in the national system.
- **Mandatory handover and certified treatment**: To ensure that WEEE is properly processed, Member States should enforce mandatory handover laws, requiring all collected WEEE to be transferred to certified recyclers or formal take-back systems. Certified recyclers would then provide detailed reports on the volume and type of WEEE treated, forming the basis for national data on WEEE management.
- **'All WEEE flows' model**: The 'All WEEE flows' model could be implemented by using treatment data from certified recyclers as the foundation for calculating the total WEEE collected. This would include both domestically processed and legally exported WEEE and used EEE for reuse. The system should also account for voluntary collection programmes run by producers, reducing their regulatory targets by the amount of B2B waste they collect. This approach would ensure that all WEEE flows are captured, improving overall transparency and accountability.
- **Enforcement to prevent 'free riding'**: To combat free riding, Member States should enhance the enforcement of information and reporting requirements. This would involve regular audits and inspections to ensure that all stakeholders, including collectors and recyclers, fulfil their obligations. The objective would be to create a level playing field

where each actor 'does their part' in the WEEE management ecosystem.

Minimum logistics and treatment requirements for WEEE across the EU

In order to reduce the dependency on virgin raw materials and increase the uptake of secondary raw materials in the production of new EEE, we must improve the quality of the recycling process output. Although better recycling techniques are available today and harmonised standards have been developed, there is no uniform application of these techniques or standards across the EU.

The Commission should take concrete steps in the elaboration of mandatory harmonised standards for all licensed WEEE operators in the EU. This, in combination with harmonised standards on the quality of secondary raw materials (e.g. the upcoming standards on the quality of plastic recycled), will ensure the quality of WEEE collection and recycling processes and that of secondary raw materials.

Re-examining the WEEE categories

The six 'open scope' categories, effective as of August 2018, were introduced by the WEEE Directive with the aim of broadening the Directive's scope to include all EEE not explicitly exempted. However, these six categories do not reflect the different lifespans and technical characteristics between various types of EEE or the commonalities and particularities of the different waste collection infrastructure and recycling thereof.

More granularity in the WEEE categories is needed to recognise these differences. The increment in the level of detail would also enable the appropriate setting of tailored collection targets calculated based on volumes of 'WEEE available for collection.'

For example, category 4 (large equipment) covers several different types of EEE as long as these meet the criterion of having at least one dimension larger than 50 cm. Thus, a soundbar, a washing machine and a solar panel fall under this same category simply because of exceeding the dimension threshold of 50 cm.

Focusing reporting where it makes a difference

Revising methodology and reporting requirements should be fully harmonised across the EU. Member States should have the same reporting categories and data requirements. This will support the collection of more readily comparable data and reduce the administrative burden on companies who currently deal with a wide variety of reporting requirements and structures (some of which are very complex at present) across Member States.

At present, some countries increasing adopt categorisation and sub-categorisation that can make WEEE reporting very complex and burdensome for producers. Developing a harmonised WEEE report template will streamline the collection of more readily comparable data, improve its quality and reduce the administrative burden on producers.

Digital labels to replace the physical crossed-out wheelie bin

Since the introduction of the WEEE Directive in 2002, the crossed-out wheelie bin has been mandated on all EEE products placed on the market in the EU. The effectiveness of this label as a means of informing consumers that electronics must not be disposed of in residual waste bins is debatable.

The crossed-out wheelie bin is in essence a negative mark advising consumers what they should not do. However, it does not make it actionable and provide consumers with information they need for recycling their device and have a positive impact on the environment. Moving away from a physical label such as the crossed-out wheelie bin towards a digital QR code would allow more actionable information to be available to consumers.

This step has already been taken in the Batteries Regulation, which allows for digitalisation of markings as of 2027.[4] Consumers buying products with a display have the means and technical literacy to use a QR code.

Prohibiting WEEE fee eco-modulation across the EU

On 18 September 2020, the Commission shared draft Guidelines on general minimum requirements for EPR schemes set out in Directive 2018/851/EU, aiming to facilitate the adaptation of EPR schemes to new requirements concerning eco-modulation of fees by providing guidance to support their harmonised interpretation and application across the EU.

However, to date there has been no progress regarding the publication of the final report, and therefore there are no established guidelines for Member States to base the development of their own WEEE eco-modulation criteria on.

As a result, France – the first Member State to introduce WEEE fee eco-modulation back in 2011 – is now revising its local eco-modulation scheme with additional criteria and unlinking the respective bonus and malus amounts from the base tariffs. We estimate that the new system will increase compliance costs over 10-fold, even for products that benefit from bonus under the eco-modulation.

[4] Art. 13(6), Regulation (EU) 2023/1542.

Greece has introduced its own new WEEE eco-modulation scheme with its own criteria, including that of manufacturing in Greece, which de facto excludes non-Greek EEE manufacturers from decreased tariffs for the concerned EEE categories.

Sweden is introducing WEEE fee malus for products containing substances of very high concern (SVHCs) at concentrations over 0.1 per cent by weight.

Schemes in the Czech Republic have introduced their own eco-modulation criteria for WEEE since 2023. However, the criteria introduced are developed by each WEEE PRO and are not even consistent on a national level.

Portugal has developed its own eco-modulation criteria, which will come into force somewhere in 2026.

DIGITALEUROPE is concerned about the lack of harmonisation currently developing and the uncertain effectiveness of WEEE fee eco-modulation. The existence of national eco-modulation criteria and methodologies creates conflicting policy incentives, without clear environmental benefits. Nationally imposed price differences contradict the single market.

We call on the Commission to put an end to the proliferation of WEEE fee eco-modulation in the EU as described above.

We would like to draw the Commission's attention to the two studies conducted on the effectiveness of WEEE fee eco-modulation, namely the economic assessment of eco-modulation by Sofies,[5] which concludes that the discussion on eco-modulation is highly political and there are is evidences to prove the measures' effectiveness, and the study on concerns and challenges of WEEE eco-modulation by WEEE Forum,[6] which concludes that it is not possible to design a broad, comprehensive and ambitious scheme in which EPR financial contributions remain limited to the essential costs for providing waste management services efficiently, whilst still having a noticeable impact on both consumer and producer behaviour.

Our recommendation is based on the principle that WEEE legislation should stay focused on its primary goal, i.e. improving WEEE management, whilst leaving product design refinement to other regulatory frameworks that are better suited for that purpose, such as the ESPR:

- **Primary objective of WEEE legislation**: The core objective of WEEE legislation should be to maximise the collection and proper recycling of e-waste across the EU. Eco-modulation of fees, i.e. charging producers differently based on the environmental characteristics of their products, risks diverting attention from this primary goal. The current challenge

[5] https://weee-forum.org/wp-content/uploads/2022/03/Annex-II_Eco-modulation_Sofies-study_Economic-assessment_2021-06-16.pdf.

[6] https://weee-forum.org/wp-content/uploads/2021/12/Eco-modulation_Interim-findings_2021-07-20_v7_Final2.pdf

lies in ensuring that all WEEE is collected and processed correctly, and efforts should be concentrated on improving WEEE collection and recycling capabilities rather than adding complexity through fee structures.

- **Clear division of responsibilities**: Waste prevention and design improvements should be handled separately from WEEE management. The task of making products more sustainable, by increasing their durability, repairability and recyclability should be addressed through product design regulations rather than waste management fees. This separation allows WEEE legislation to focus on what it is primarily concerned with: managing the end-of-life stage of products, including collection, recycling, and proper disposal.
- **Design and market challenges**: For manufacturers, the need to account for different eco-modulation criteria in each Member State complicates the product design process. Companies may find it challenging to develop products that meet diverse environmental criteria across multiple markets, potentially stifling innovation and creating barriers to market access. This lack of uniformity undermines the single market and can lead to increased costs for both producers and consumers.

Prohibiting visibility of WEEE fees for ICT products across the EU

The WEEE Directive allows Member States to require producers to show the purchasers at the time of sale of new products, the costs of collection, treatment and disposal in an environmentally sound way. The costs mentioned shall not exceed the best estimate of the actual costs incurred.

Currently, there is fragmentation in the implementation of this requirement across Member States, as several countries have made the visible WEEE fee a mandatory obligation for producers.

This creates unnecessary administrative burden in the supply chain, especially for the ICT sector, where products are small and light, and the portfolio of products is very broad. The requirement to show the actual costs visibly on sales invoices causes the need to frequently show the updated costs due to the periodically increasing WEEE fees, especially in times of high inflation across Europe.

The implementation of visible WEEE fees presents more challenges than benefits. It imposes a significant administrative burden on producers, offers questionable value in preventing free-riding, and does not demonstrably lead to higher e-waste collection rates. Given the uncertainty of cost projections and the lack of clear consumer or environmental benefits, the Commission should re-examine the usefulness of visible WEEE fees:

- **Administrative and IT burden for producers**: Requiring producers to display visible fees for WEEE management imposes a significant administrative and IT burden. Producers must adjust their systems to calculate, display and report these fees at the point of sale, which can involve substantial costs, especially for companies operating in multiple Member States with different regulations. This requirement can lead to increased complexity in billing, pricing and financial reporting, straining resources without clear benefits.
- **Questionable efficacy in preventing free riding**: Some Member States justify visible fees as a means to ensure that producers are correctly charging and remitting WEEE fees to local PROs. Whilst this may provide a layer of transparency for authorities, it does not necessarily prevent free riding more effectively than other mechanisms. Compliance can be ensured through auditing and enforcement measures without requiring fees to be visible, thus avoiding the administrative burden on producers.
- **Lack of correlation with higher collection rates**: The argument that visible fees lead to higher collection rates is not strongly supported by evidence. Comparative data from countries with and without visible fees does not consistently show higher collection rates where fees are visible. This suggests that fee visibility does not significantly influence consumer behaviour in terms of e-waste disposal, questioning the overall effectiveness of this approach.
- **No apparent benefit to consumers or the environment**: Visible fees do not provide clear benefits to consumers or the environment. Consumers often do not use the visible fee information to make more environmentally conscious decisions, as the visible WEEE fee differentiation between products of the same category (when and where there is one) is normally the result of the weight difference between the products concerned, and is typically uncorrelated to different environmental parameters associated with the product. Furthermore, the fees paid for products placed on the market today are only estimates of the current WEEE costs associated with today's management of WEEE of the same category. This does not make the fees accurate in reflecting the reflect WEEE costs associated with the marketed product, whose actual cost of WEEE treatment may vary significantly by the time the product is discarded. Thus, the visible fee provides little practical value to consumers and does not provide accurate information about the actual costs of WEEE management of the purchased product.

Maintain the open scope whilst carefully allocating innovative products in existing or new EEE categories

As of August 2018, the WEEE Directive has an 'open scope,' meaning that virtually all finished EEE falls in scope. These products must be reported under one of the six 'open scope' categories unless they are specifically exempt. The Directive's exempted categories include certain types of equipment like large-scale fixed installations (LSFI), large-scale industrial tools (LSIT) and EEE designed to be part of another type of equipment.

The WEEE Directive's scope should not be expanded in its revision process. The current scope, which already covers all finished EEE, with exemptions, is sufficient and non-finished EEE, such as spare parts, should remain outside the scope. This would avoid unnecessary complexity and focus the producer's efforts on ensuring compliance of their complete products, rather than components.

The Commission should also aim to harmonise Member States' differing interpretation of key aspects of the WEEE Directive. This includes the definition of what constitutes EEE and the distinction between household and non-household EEE. Harmonisation would help producers (i.e., manufacturers, importers) and sellers of EEE down the supply chain to better understand and comply with their EPR obligations across the EU.

No product design requirements

New design-related requirements should not be introduced by the revision, which should instead focus on enhancing and enforcing the existing framework under the ESPR. This approach would avoid regulatory overlap, ensure clarity for manufacturers, and better achieve the EU's sustainability goals through a single, cohesive legislative instrument.

The WEEE Directive already addresses aspects related to EEE design, particularly focusing on facilitating the recycling and reuse of waste. Art. 4 requires Member States to ensure that producers do not use specific design features or manufacturing processes that hinder the reusability or recyclability of products unless these features are necessary for critical reasons, such as environmental protection or safety. The WEEE Directive already references the Ecodesign Directive,[7] which is tasked with facilitating the reuse and treatment of WEEE, mandating that design processes should not obstruct the end-of-life handling of products, highlighting that ecodesign requirements are already in place to manage these aspects.

The Ecodesign Directive currently imposes requirements aimed at enhancing the recyclability, repairability and reuse of EEE. These measures are designed to extend the lifespan of products and ensure that they can be more easily recycled at the end of their life. The forthcoming ESPR is expected to introduce further product design requirements that will focus even more on waste prevention and the efficient management of waste at the product's end of life.

[7] Directive 2009/125/EC, now replaced by the ESPR.

These future measures will likely impose stricter requirements on design for sustainability.

In particular, the WEEE revision should not introduce recycled content targets, as the availability of recycled content is strongly correlated to the product group, the material composition and usage of a given product. The ESPR is a better regulatory vehicle to this end.

Introducing additional design requirements under the WEEE Directive, on top of those already governed by the Ecodesign Directive, would result in overlapping and potentially conflicting regulations. This would likely create confusion, increase compliance costs for manufacturers and complicate enforcement.

By keeping ecodesign as the single legislative vehicle for product design, the EU would ensure a more streamlined and consistent approach to regulating product design, particularly in relation with environmental sustainability. This would prevent the duplication of efforts and allow manufacturers to focus on meeting a single set of requirements.

FOR MORE INFORMATION, PLEASE CONTACT:

- Francesco Alemani

  Policy Officer for Sustainability

  francesco.alemani@digitaleurope.org / +32 490 44 20 68

- Raphaëlle Hennekinne

  Policy Director for Sustainability

  raphaelle.hennekinne@digitaleurope.org / +32 490 44 85 96

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DIGITALEUROPE
Rue de la Science, 37, B-1040 Brussels
T.+32 (0) 2 609 53 10 / www.digitaleurope.org / @DIGITALEUROPE
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