Europacable calls on the EU Commission to establish a robust framework for a Circular Single Market for power and telecommunication cables and to maintain the exclusion of these cables from the WEEE Directive

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Europacable urges the Commission to establish a robust framework for a competitive and harmonised Circular Single Market for cables, and to keep power and telecommunication cables excluded from the scope of the Directive on Waste Electrical and Electronic Equipment (WEEE).[1]

For European cabling system production, access to secondary materials will be essential to empower Europe's electrification and decarbonisation through cables made in Europe for Europe. This said, the WEEE Directive is not the right tool to recover materials from power or telecommunication cables due to complexities related to ownership, technical and environmental constraints and economic viability.

Instead, Europacable recommends supporting the scaling up of existing market systems into a competitive and harmonised Circular Single Market for cabling systems through a regulatory framework that supports innovation and circularity, while keeping a level playing field for manufacturers. This will significantly contribute to meet our industries' need for high-quality critical raw materials (CRMs), particularly for copper and aluminium. Furthermore, such market recovery and recycling systems allow to accommodate for the different cable types and their installation methods.

Europacable, the voice of Europe's leading wire and cable system manufacturers, strongly supports the European Union's ambition to accelerate circularity, enhance resource efficiency, and secure access to critical raw materials. The intrinsic value of copper and aluminium may provide an economic incentive for recovery, decided by asset owners on a case-by-case basis, considering technical feasibility, operational constraints and environmental impacts.

The current WEEE Directive aims to correct market failures at end of life by ensuring the proper collection and treatment of electrical and electronic equipment that would otherwise not be recycled, due to a low or negative residual value. This however does not apply to cables: cables typically retain a consistently positive residual value due to their high copper and/or aluminium content.

In other words, the typical "WEEE problem" does not apply to cables: they are pulled into recycling by value on a case-by-case basis and not pushed by legislation.

For that reason, including cables in WEEE is unlikely to deliver additional material recycling benefits. On the contrary, it would add technical, economic, financial, environmental, regulatory and administrative burden as well as affordability concerns. If the objective is to increase recycling rates where they are currently insufficient, policy should focus on product streams that lack such inherent economic value.

Europacable stands ready to closely cooperate with the European Commission and EU Institutions to create the right conditions to produce cables made in Europe for Europe.

Please consult the rationale and recommendations that are available on the next pages.

[1] Europacable does not object to the existing inclusion of power cables <1kV with a connector into the scope of the current WEEE Directive.

ANNEX: Rationale and Recommendations

The upcoming Circular Economy Act, including a revision of the WEEE Directive, is an important opportunity to reinforce circularity objectives. However, any potential extension of the scope of the existing Directive should remain proportionate, evidence-based, and aligned with the technical, environmental and economic realities of the products concerned. Mandatory obligations would be both ineffective and counterproductive for value chain stakeholders. Decisions regarding recovery of cable infrastructure and material recycling must remain entirely with asset owners, on a voluntary basis.

Power and telecommunication cables are the backbone of Europe's energy and digital infrastructure. Their ownership structure, technical characteristics and end-of-life management differ fundamentally from electrical and electronic equipment (EEE) currently covered by the Directive, rendering its application impractical: it would risk placing disproportionate regulatory and financial burdens on European industry, undermining its capacity to invest in the infrastructure required for the twin transition, ultimately delaying Europe's decarbonisation, digitalisation and energy sovereignty objectives.

This said, effective market-based cable circularity solutions are already existing and have proven to be viable. Europacable therefore recommends supporting the scaling up of these market systems (particularly closed loops) in a competitive and harmonised manner to meet our industry needs for high-quality critical raw materials (CRMs), particularly for copper and aluminium.

A. Why the WEEE Directive is not the right tool with regards to power and telecommunication cables

1. Ownership and responsibility: A misalignment under EPR

Power and telecommunication cables are not comparable to the typical EEE that are currently covered by the WEEE Directive. As other large installation products, they are long-life infrastructure assets, installed as part of integrated network systems and designed to operate over several decades. In most instances, they are designed, produced and installed according to the specifications of the asset owners such as energy utilities, telecom operators and industrial users. Once installed, they are owned, operated and managed by them. Manufacturers do not retain ownership, access rights, or operational control.

End-of-life decisions, after such long periods of time, are complex, particularly due to their wide variety of installation schemes. They are not driven by manufacturers, but by asset owners in the context of network management, maintenance and upgrade activities. Applying Extended Producer Responsibility (EPR) obligations to cable manufacturers would create a fundamental misalignment between legal responsibility and actual control over infrastructure assets. Additionally, they would create financial liability through fees and administrative procedures, thus affecting the affordability of projects for the whole value chain.

- ⇨ ***Responsibility for end-of-life management lies with asset owners, technically supported by manufacturers.***

2. Technical complexity: A panoply of cable typologies for a wide array of applications

Currently, only low voltage cables (<1 kV) equipped with connectors are in the scope of the Directive. This is consistent with their typology and use. Their end-of-life is associated with the EEE they equip.

Beyond these, cables are deployed wherever power and telecommunication are needed, with each typology having its own specific technical features. Cables encompass a wide array of products, going from electricity cables (including low-, medium-, high- and extra high-voltage cables) powering our societies and economies, to telecommunication cables (from legacy copper to optical fibre cables) connecting and digitalising Europe, to cables required for industrial and special uses. These are deployed across highly diverse environments, i.e., underground, subsea, overhead, or integrated within buildings and technology assets, and form part of complex, large-scale systems.

Such specificities make it difficult to treat cables as a single, homogeneous waste stream. Installed cables are often not individually identifiable after decades of operation, and networks typically consist of multiple generations of products from different suppliers. Traceability to individual manufacturers is therefore impractical, if not impossible, notably after decades of service.

In addition, physical access to cables can be constrained, when they are embedded in ducts, trenches, buildings or infrastructure, or installed in locations of difficult access (e.g. seabed). Recovery does not occur as a standardised, product-by-product process, but rather in phases, depending on operational needs and infrastructure developments.

These characteristics are comparable to those of other large-scale fixed installations, where the WEEE framework has been recognised as unsuitable. Applying a standardised EPR model to such system-integrated assets would not reflect operational realities and would introduce significant technical and administrative complexity.

⇨ ***The diversity of cable types, their integration into complex systems and their long operational lifetimes make the application of WEEE requirements impractical.***

3. Environmental impacts: Recovery is not necessarily beneficial

The environmental implications of removing cables as well as their recycling should be carefully assessed on a case-by-case basis. In many situations, the extraction of cables, notably in case they are installed underground or subsea, requires extensive civil works, including excavation and infrastructure disruption. These activities can generate additional greenhouse gas emissions, use of additional resources and environmental disturbance that may outweigh the benefits of material recovery. Removing certain cable types can, additionally, be a source of hazard for ecosystems and human health. Asset owners already take these considerations into account when deciding whether to remove or leave cables in place. In practice, high-value materials are recovered where it is environmentally feasible and economically justified. Conversely, where recovery would lead to disproportionate impacts, cables may remain in situ as the more sustainable option.

Copper and aluminium can be recycled from power and telecommunication cables. The properties of the recycled materials are such that they can be re-used in cable applications as conductors. This can also be the case for plastic insulation materials, provided hazardous substances can be eliminated. Contrary to this, the recycling of germanium, another critical raw material used in optical fibre cables, is neither technically nor economically viable. Indeed, the substance becomes permanently bound in the glass fibre and cannot be separated.

⇨ ***The environmental implications of cable recovery are context-dependent and must be assessed case-by-case.***

4. Economic viability: A voluntary case-by-case approach as a balanced and proportionate solution

Recovery and recycling activities are established industrial and market practices in the European cable industry. Introducing WEEE obligations would impose significant administrative and financial burdens on manufacturers, including registration, reporting, and financing requirements across Member States. At the same time, manufacturers lack the necessary visibility over installed volumes, future waste flows, and recovery timelines to effectively fulfil such obligations.

Extending the WEEE scope to infrastructure assets risks disrupting existing recovery systems, creating overlaps with existing waste frameworks, and increasing regulatory complexity. Decisions regarding the recovery of cable infrastructure should therefore remain entirely with asset owners, on a voluntary basis. This would ensure that actions are taken on a case-by-case basis, only where they are technically feasible, environmentally authorised, and economically proportionate.

Furthermore, introducing WEEE obligations would impose additional financial burdens on cable system manufacturers, which would ultimately be reflected in the costs of the products they supply. This, in turn, would negatively affect the affordability of deploying electrical and digital infrastructure at a critical time for Europe's decarbonisation and digitalisation.

It could also increase the attractiveness of non-EU imports, thereby putting at risk a strategic industry that is essential to securing the continent's decarbonisation, digital transformation, and energy sovereignty.

⇨ ***The economic implications require a case-by-case approach. Furthermore, any policy intervention must ensure economic viability and provide sufficient predictability for all actors involved.***

B. Recommendations for a Circular Single Market for power and telecommunication cables

1. A competitive Circular Single Market System for cables

Scaling up existing market-based circularity practices for cables will be a powerful and effective tool to enhance Europe's access to recycled copper and aluminium. Europacable recommends developing the following approaches to empower a high-quality, sustainable cable production in Europe:

- **Avoid overlapping regulations**: Circularity requirements must be harmonized across EU legislation to prevent overlapping or conflicting obligations, particularly between product, waste, and chemicals regulations. Existing legislation must be reviewed to eliminate contradictions that could impede circularity. For example, restrictions on certain substances in recycled materials must be balanced against the environmental benefits of material recovery.
- **Enforce strict market surveillance:** Enforcement mechanisms must be strengthened to prevent non-compliant or substandard products from entering the EU market. For example, aluminium power cables imported from outside the EU may circumvent environmental and safety standards if not properly covered by instruments like the Carbon Border Adjustment Mechanism (CBAM).

- **<u>Ensure fair competition conditions</u>:** Requirements to use recycled materials must be applied where technically, environmentally and economically viable.

⇨ ***A competitive Circular Single Market System for cables, able to integrate quality secondary materials in cable production at large volumes by avoiding overlapping regulations, enforcing strict market surveillance and ensuring fair competition.***

2. A harmonised European Circular Single Market System for cables

To avoid fragmentation and inefficiencies, Europacable believes it is necessary to:

- **<u>Establish a harmonised approach</u>** to circularity for cables across Member States, avoiding a patchwork of national rules that hinder cross-border operations and investment.
- **<u>Promote one European standard</u>** (such as EN 45557 for power cables) for recycled content of secondary materials and the communication of recycled concentration through the Digital Product Passport (DPP).
- **<u>Ensure that circularity measures are proportionate and predictable</u>**, enabling long-term planning and investment by manufacturers.
- **<u>Prevent exports of end-of-life cables and scraps</u>** outside of the Union, to maximise the available stock of quality recyclable material, considering the available European capacity to recycle.

⇨ ***A harmonised Circular Single Market System for cables, by establishing a harmonised circularity approach across Member States, promoting a single European Standard for secondary recycled content, ensuring that circularity measures are proportionate and predictable and, importantly, preventing exports of end-of-life cables and scraps.***

Electrification and digitalisation are key to ensure Europe's decarbonisation and strategic autonomy. Europacable stands ready to closely cooperate with the European Commission and EU institutions to create the right conditions to produce cables made in Europe for Europe, by securing a strong supply of quality CRMs.

For further information please contact: a.lampasona@europacable.eu

About Europacable
Europacable is the voice of Europe's leading wire and cable producers. High-quality, sustainable power and telecommunication cables, produced by our members in Europe, empower the electrification and digitalisation of our societies. Founded in 1991, Europacable represents the largest cable makers in the world providing global technology leadership, as well as highly specialized small- and medium sized businesses from across Europe.
With our future being ever more electrified and digitalised, cable technology will be the core backbone of Europe´s energy and telecommunication infrastructures. Sustainable, low-carbon manufacturing and high-performance cables are essential to achieve Europe's climate neutrality objectives by 2050. Europacable is committed to the principles of free enterprise and fair trade. Our members employ over 80.000 people of which more than 50% in Europe, generating a worldwide turnover over € 70 billion in 2025. Europacable is a member of Orgalim, RGI, WindEurope and a partner of CENELEC and EUEW. Europacable is listed in the European Commission's Transparency Register under 453103789-92. www.europacable.eu