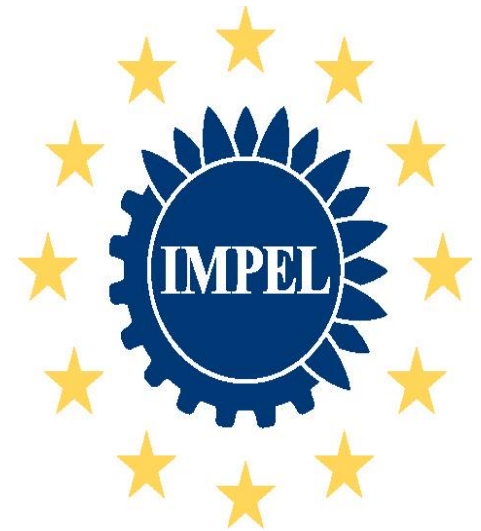


E-waste Enforcement

Marina de Gier



Okayama 2014

European Union Network for
the Implementation and Enforcement
of Environmental Law

Content

- Some Statistics
- WEEE general policy and collection system
- E-waste Enforcement



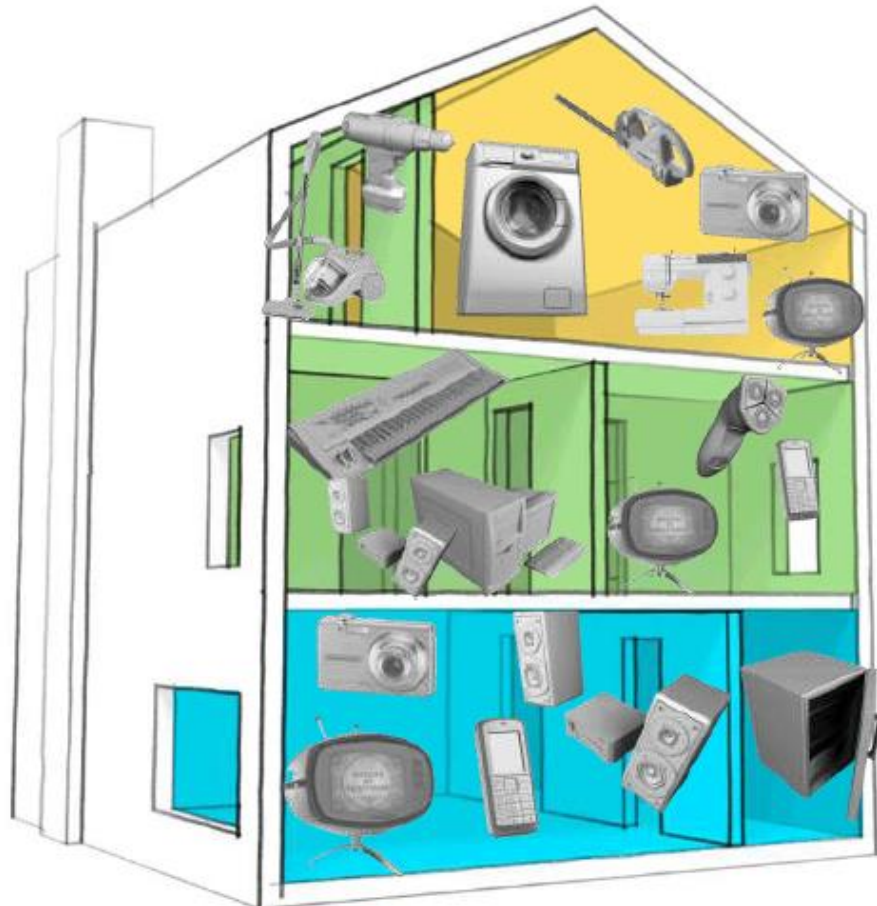
No good statistics on export of E-waste

- No universal agreement on the definition and scope of E-waste;
- In Europe definitions in the WEEE Directive;
- But different national implementation of the WEEE Directive in Europe;
- Individually developed product lists used by Producer Responsibility Organisations;
- Used EEE is not seen as waste and can have different (the strangest) customcodes.
- Some countries don't ask for notification regarding E-waste (eg metal scrap out of E-waste)

Need to harmonize data and good customcodes.



Total 425 million appliances



Dutch citizens think
24 appliances
per household,

Reality 60



Still some data for the NL

Around 26.5 kg/inhabitant a year of EEE is put on the market;

Around 21 kg/inhabitant a year is becoming WEEE

Around 2,7 kg/inhabitant a year is exported as second hand.

7.5 kg is collected by the producers

6.6 kg treated by other recycling facilities

2.3 kg is incinerated

Between 1.8 and 5.2 kg is not identified yet or can't be identified.



General Policy

- Producers are responsible
- Principally the producers have to decide:
 - Collective or individual system
 - How the collection is organized
 - How the treatment is done
 - Data collection for monitoring requirements
 - Financing of the system (vissible fee or not*)



Collection target

- 4 kg per inhabitant now up to 20 kg in 20
- or 45% in 2016 and 65% of equipment sold or 85 % of generated waste in 2020.

- NL 7.3
- Norway 15.8
- Belgium 9.3
- Germany 8.8
- France 6.4
- Spain 3.2

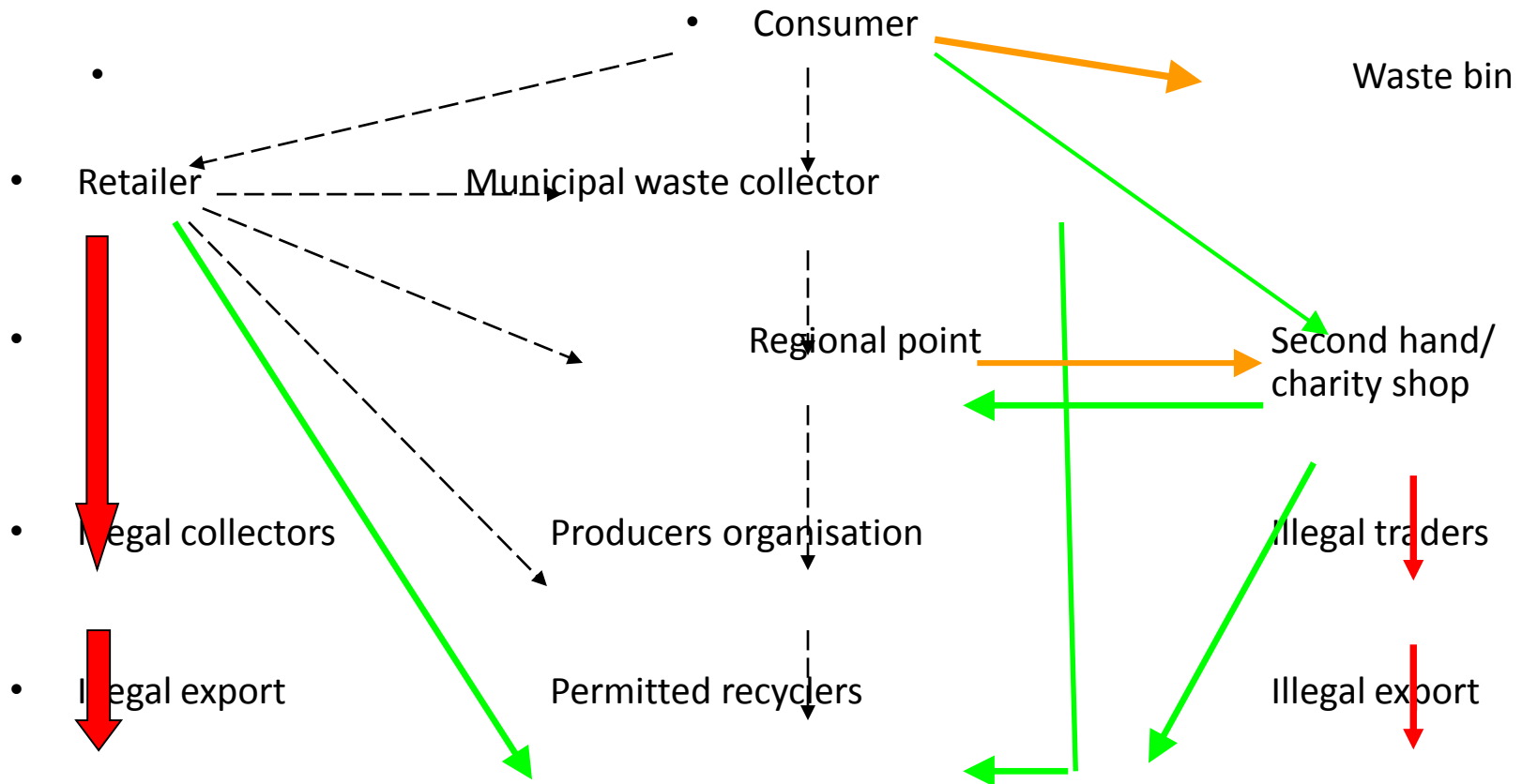


Collection system

- Consumer to retailer (old for new or nothing) or municipal waste collector.
- From retailer and municipalities to regional points.
- From regional points to producers organisation
- From producers to permitted recyclers.
- Permitted recyclers WEEEbalex.



Enforcement on illegal collection



Inspections

Sources of WEEE

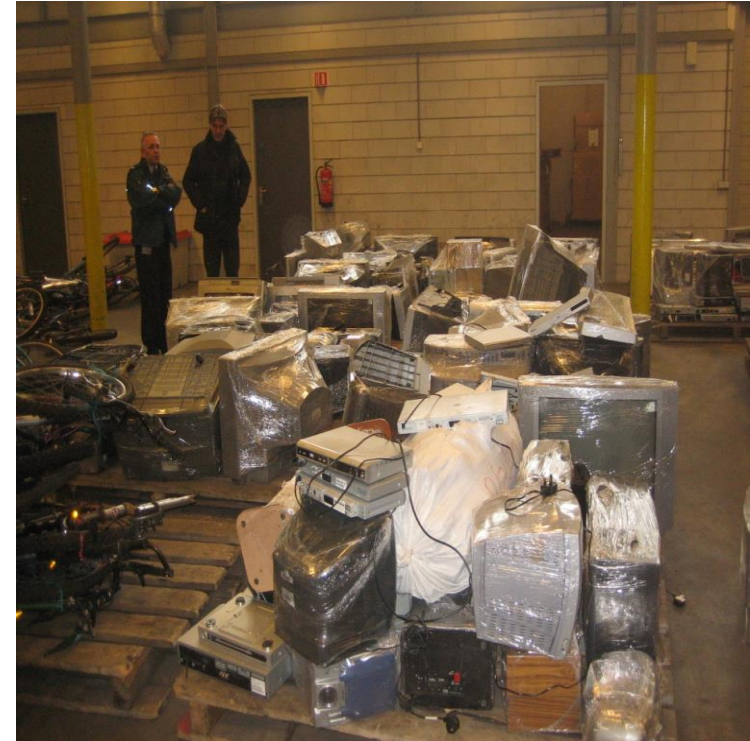
- Retailers
- Collection centers of municipalities
- Business users of electronics

Collectors/traders

- Non registered companies/persons
- Scrap dealers
- Re-use shops refurbishers

Transport

- Roads (to port and eastern Europe)
- Ports



Enforceability of Annex VI WEEE Directive 2012/19/EU

- Copy invoice/contract that EEE is fully functioning
- Declaration of non waste
- Evidence of testing
- Proper packaging



Copy invoice/contract that EEE is fully functioning

- Often limited to a remark “tested” at the transport document
- Gives a first impression whether and how the shipment could be investigated
- However not a declaration authorities can trust on



Evidence on testing

- Difficult to determine whether:
 - the testing method is appropriate
 - the whole /all appliances are tested
 - the document is genuine
 - Type of equipment / Packaging method often gives an impression
- Many small exporters are not aware of the requirements yet



Proper packaging

- Gives a good impression whether the EEE is destined for reuse
- Not always clear what is sufficient packaging
 - Example CRT screens



Inspection of containers

Customs

- Pre-departure
- Profiles

(H.S. codes “new” equipment, household goods; description; price; names; involved agents etc)

Police, local authorities

- Inform us when they notice a loading place of containers

Take back request by other countries

- Mostly Belgium



Basic check

- Check of testing documents
- Visual check of the cargo
 - Type of equipment; packaging; description on the EEE
- Interview with exporter/other involved companies

Former procedure: always testing by authorities

New procedure:

No testing documents or bad packaging (>2 m³)

→ Waste



Former procedure

- Unloading container
- Basic functionality tests by customs/inspectors
 - Limited number of samples (eg power, image , sound)



New procedure: Conclusion waste

- Exporter has to take the container back
 - Should take care for proper recycling; or
 - Testing and sorting the equipment
- ILT agreement with a waste facility and collection scheme
 - Exporter transports the container to the designated waste facility
 - Testing and sorting at waste facility
 - Collection scheme takes over the WEEE without costs



Awareness raising & Cooperation

National

- Producers organisations
- Retailers
- Municipalities/Local authorities
- Customs
- Police



International

- IMPEL (joint inspections, information exchange etc)
- Secretariat of the Basel Convention
- Individual countries in Africa and Asia

Cooperation with countries in Africa & Asia

Aim to stop illegal exports of WEEE

Are shipments of used electronics really destined for re-use?

- Is it allowed to import used electronics?
- Is there a market for the specific items



Are shipments of scrapped electronics destined for ESM recyclers?

- Is the consignee licenced?
- Is the specific type of waste allowed?

Last not but least!



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Join the interactive platform between
IMPEL en Asian countries to share
information and to ask question!

For more information:
marina.de.gier@ilent.nl