



European Union Network for the Implementation
and Enforcement of Environmental Law

IMPEL

EPR WEEE



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Meeting Asian Network on the Transboundary Movement
of Waste

28-30 November 2017 Hanoi Vietnam

Content

- Regulation EPR and ESM of WEEE
- Challenges regarding recycling





WEEE Directive

- The new WEEE Directive (2012/19/EU) introduces a collection target of 45% of electronic equipment sold that will apply from 2016 and, as a second step from 2019, a target of 65% of equipment sold, or 85% of WEEE generated.
- The new collection targets agreed will ensure that around 10 million tons, or roughly 20kg per capita, will be separately collected from 2019 onwards.
- Article 11 (in combination with with annex V) sets the recycling targets for the different product categories.

WEEE Directive

- Directive means that each MS has to implement the Directive in national legislation.
- Means differences between MS:
 - differences in number of compliance schemes;
 - different requirements regarding recycling: eg some countries refers to WEEELABEX or CENELEC



WEEE Directive

- Art 8, sub 2 requires proper treatment (refers to annex VII)
- Art 8, sub 3 requires the use of best available techniques
- some countries refer to WEEELABEX
- Annex VII describes the selective treatment of materials and components



Obligation for processors

a. Proper treatment :

- Minimum recovery targets (Annex V)
- The isolation of all liquids and a selective treatment of (Annex VII) eg:
 - mercury containing parts
 - batteries
 - PCB containing capacitors
 - plastics with brominated flame retardants
 - asbestos components
 - cathoy ray tubes
 - ozone depleting substances



Obligation for processors

Depollution and not hindering
the environmental sound
preparation for re-use and
recycling



WEELABEX

- Normative requirements that operators, collection facilities, logistic operators and treatment facilities are expected to comply with;
- All requirements as one integrated package and a coherent structure





WEEELABEX normative document, part I, General requirements

Part I, General requirements

- 4 Administrative and organisational requirements
 - 4.1 Legal compliance
 - 4.2 Management principles
 - 4.3 Technical and infrastructural preconditions
 - 4.4 Training
 - 4.5 Downstream monitoring
 - 4.6 Preparing for re-use
 - 4.7 Shipments

5 Technical requirements

- 5.1 Handling
- 5.2 Storage
- 5.3 De-pollution
- 5.4 De-pollution monitoring
- 5.5 Further treatment
- 5.6 Storage of fractions and component
- 5.7 Recycling and recovery
- 5.8 Disposal of fractions
- 5.9 Documentation

WEEELABEX, part II, specific requirements

- Specific requirements for the treatment of CRT display appliances
- Specific requirements for the treatment of Flat Panel Displays
- Specific requirements for the treatment of Lamps
- Requirements for Cooling and Freezing Appliances containing CFC, HCFC or HFC
- Requirements for Cooling and Freezing Appliances containing Hydrocarbons (HC)



Attestation of Conformity

This document confirms that:

Coolrec Group BV
(site DORDRECHT)
Grevelingenweg 3, 3313 LB DORDRECHT
The Netherlands
(Operator Type 1 & 2)

has met with the conformance requirements of normative document:
WEEELABEX Standard, Treatment (v. 10)
and other conformity verification criteria as defined by the WEEELABEX Organisation.

For the following treatment streams:

- **Large appliances (WEEE Categories 1 & 10; excluding temperature exchange equipment)**
- **Temperature exchange equipment (WEEE Category 1 - fridges; freezers; air-conditioning units, heat exchange tumble dryers etc.)** - Exclusions /Exceptions: Professional units; ammonia units and air-conditioning units.

Certificate No.: 14-0005
Lead Auditor: Julie Ann Adams
Registration Date: 3rd September 2014
Date of Expiry: 2nd September 2016

In Prague

3rd September 2014
Date

Mario Voroš
Managing Director

The Attestation of Conformity is dependent on the above treatment operator maintaining their systems and procedures to adhere to the WEEELABEX Treatment Standard (and associated criterion) and complying with the terms and conditions agreed with the WEEELABEX Organisation.

The Attestation of Conformity document is the property of the WEEELABEX Organisation and shall be returned, upon request to the WEEELABEX Office on cessation of listing for whatever reason. The WEEELABEX Organisation will maintain a list of approved WEEELABEX Operators and their scope of registration on <http://www.weeelabex.org/>. The Mark of the WEEELABEX Organisation awarded to the WEEELABEX Operator is subject of the "Agreement for Treatment Operator".

WEEELABEX, downstream monitoring

The operator shall document the origin of the WEEE treated and the downstream treatment chain of WEEE and fractions as long as they have not reached the end of waste status.

Also when shipment is going abroad



An overview of the downstream documentation required according to the Clause 2.4:

The table below summarises all the information required on fractions for the purpose of downstream monitoring and establishment of recycling and recovery rates. The information recorded shall give a just account of day-to-day business and all outlets used. It will therefore be applicable to both batch and annual data.

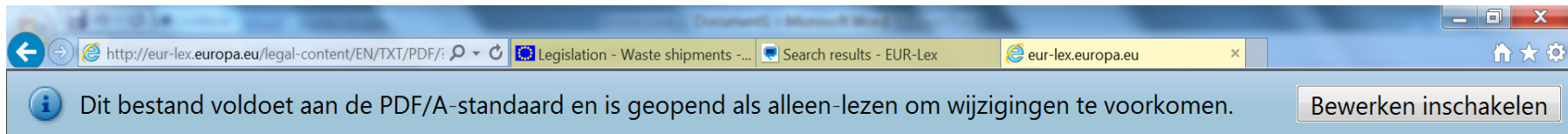
Table - Summary of information requirements:

Information Required for Downstream Monitoring and Establishment of Recycling & Recovery rates:	Mass	Composition	Classification of final use of fractions	Final Treatment Technology(ies)	Information on First Acceptor	Information on Downstream Acceptor(s), including Final Acceptor
Fractions that have reached end-of-waste status	(ii)	(iii)		(ii)		

Information Required for Downstream Monitoring and Establishment of Recycling & Recovery rates:	Mass	Composition	Classification of fractions	Final Treatment Technology(ies)	Information on Fir
Fractions that have reached end-of-waste status	(ii)	(iii)		(ii)	
Metal fractions which contain less than 2 % of non-metal fractions	(iii)	(ii)	(ii)	(ii)	
Non-metal fractions containing less than 2 % of other materials	(iii)	(ii)	(ii)	(iii)	(i)
Fractions which are classified as hazardous according to the European list of wastes and/or batteries and accumulators and capacitors that shall be removed according to the WEEE Directive	(iii)	(ii)	(ii)	(iii)	(iii)
Final fractions being forwarded for energy recovery or disposal	(ii)		(ii)	(i)	



Waste Shipment Regulation



Additional obligations

Article 49

Protection of the environment

1. The producer, the notifier and other undertakings involved in a shipment of waste and/or its recovery or disposal shall take the necessary steps to ensure that any waste they ship is managed without endangering human health and in an environmentally sound manner throughout the period of shipment and during its recovery and disposal. In particular, when the shipment takes place in the



Challenges

Producers of EEE doesn't give good information on how to recycle;

Often no design for recycling;

Not clear what kind of hazardous substances are used in EEE;

Difficult to know how WEEE is treated in other countries.



IMPEL project WEEE plastic and BFR's (conclusions)



- There are considerable classification differences for BFR-containing WEEE plastic e.g. not listed, Annex IV, Annex III, hazardous or not hazardous waste.
- The competent authorities have only minor experience on how to inspect BFRs in WEEE plastic (priority for detecting illegal shipments is rather low).
- Data about produced, treated or shipped amounts of BFR-containing WEEE plastic are poor.
- No common understanding on the threshold of BFRs and the way to detect BFR's in WEEE plastic.
- No common understanding on the responsibility for removing and treating BFR-containing WEEE plastic.
- Lack of awareness regarding the provisions concerning BFRs in WEEE plastic at companies dealing with WEEE plastic.



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Thank you!

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