



Position paper on Article 15 of WEEE Directive 2012/19/EU on Information for Treatment facilities

Introduction

In September 2005 EICTA (now DE), CECED and EERA published a joint guidance document on the on implementing article 11 of Directive 2002/96 (EC) concerning information for treatment facilities. 10 Years after this document is outdated and with the new WEEE Directive 2012/19/EU coming into effect, new measures need to be taken. Article 15 calls for “Member States to take necessary measures to ensure that producers provide information free of charge about preparation for re-use and treatment in respect of each type of new EEE placed for the first time on the Union market within one year after the equipment is placed on the market”. In this document proposals are given for the relevant information on EEE placed on the market which is instrumental for WEEE preparation for re-use and treatment operators

General

As a starting point EERA proposes to use the ‘Leitfaden für die Behandlung von Elektro- und Elektronikgeräte’ published by the Austrian ministry of environment¹ as basis for the exchange of information on a digital platform. The risk of a paper version, like the aforementioned, is that it is static and becomes outdated when not revised in time. The digital platform could have 2 layers:

1. Information for proper depollution in line with the WEEE Directive that should be available for everybody,
2. Information on manuals, studies, fora etc. that should be available to operators that have an agreement with producers and/or EPR schemes.

Apart from information provided via the digital platform EERA also wants to stress the importance of labelling. Labelling is very useful for recyclers provided that the information fulfils the following 3 conditions:

- it is uniform,
- it is adopted early and by all, and
- it is visible and easily recognisable (big logos or letters, colours (small print is not useful).

The labelling should be applied to:

- provide information on hazardous components and substances, or
- give instructions for logistics and/or treatment.²

¹ This handbook can be downloaded from the following website:
https://www.bmlfuw.gv.at/greentec/abfall-ressourcen/elektroaltgeraete/eag_studien.html

² Examples:

- Labels on washing machines, dish washers, dryers, temperature exchange equipment indicating that these appliances shall not be treated in large (car) shredders without appropriate depollution.
- Labels on appliances that contain Lion batteries.

Information per appliance group

For the 'depollution' layer on the digital platform EERA proposes to provide information per group of appliances and not per appliance type. Examples of such groups are:

- CRT monitors and TVs
- Flat panel displays
- Household cooling and freezing
- Professional cooling and freezing
- Air-conditioners, heat pumps and other temperature exchange equipment
- Boilers
- Washing machines
- Dish washers
- Other large kitchen appliances
- PVs
- IT equipment containing Lion batteries
- Etc.

Per group of appliances the following information should be provided:

- Dangerous components/substances used (as a minimum the ones mentioned in Annex VII of the Directive) with a short description and photo,
- Place where these are usually found in the appliance,
- Dismantling instructions,
- Special cases (exotic types, e.g. asbestos insulated cables in clothes irons): how to recognize them and dismantling instructions,
- Advice on collection (separate/mixed)³ and on logistics (ADR).
- Presence of labels used for products starting with month and year when the products are placed on the market

EERA also proposes to provide per appliance group:

- extra information on materials that are recyclable if certain technology is used (e.g. PMMA plates from FPDs to be dismantled manually),
- information on Lion batteries which cannot be removed without (advanced) tools (where to find them and what tools should be used),
- description of the component/substance and its different types (some may not be dangerous or have different characteristics)⁴
- personal protection equipment needed for handling
- MSDS sheets when applicable
- risks when not properly dismantled
- advice on possibilities to sort the components or substances (when different treatment is possible for different types)
- advice on available treatment techniques (without mentioning specific companies).

Library

EERA proposes to provide a place on this digital platform where studies on recycling and depollution of WEEE are published, with a link between the study⁵ and the relevant appliance

³ The advice could be to collect separately or sort when there is a significant concentration of a specific hazardous component in one appliance group in order to avoid dilution (e.g. hot-melt guns)

⁴ A colour could be used to aid recognition of the component (e.g. dry capacitors, which do not contain hazardous substances, could be marked with a specific color, f.i. green)

⁵ Examples of such studies are the study on VIP material by CECED, different studies that have been done by Wecycle, Recupel and Eco-Systèmes on capacitors, etc.

group and/or dangerous component or substance. However we find it important that these studies are reviewed by relevant experts before publishing to avoid false use/interpretation.

Interaction/communication

EERA suggests to create an internet forum on this platform for exchange of information between recyclers and producers. This may lead to new better understanding and/or new research.

The digital platform could also be used to provide information about the specification of materials that can be used in new appliances⁶. Finally it is proposed to add a 'contacts' page with contact information for registered users (producers, recyclers, federations, EPR schemes, etc).

Back ground EERA

EERA counts 35 recycling companies that treat > 2 million tonnes of WEEE annually. Our members are located in the following countries: Austria, Belgium, Bulgaria, Czech Republic, Denmark, Italy, Finland, France, Germany, Greece, Ireland, Poland, Portugal, Romania, The Netherlands, Norway, Slovakia, Spain, Sweden, Switzerland and the United Kingdom.

EERA objectives include gaining influence at EU-level for the common good of the recycling industry and on following and responding to issues that are under discussion at national and international level. One of our aims is to promote EN50625 standards on collection, logistics and treatment of WEEE.

EERA members are signatories to the rules of conduct to safeguard environment, health and safety. For more information: www.eera-recyclers.com.

⁶ E.g. Specifications on plastics like e.g. Philips, Elektrolux and HP are currently using for their "green" products.

