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78th EERA meeting Düsseldorf 30-11-2017:

Attendees: Chris Slijkhuis (CS), Arjen Wittekoek (AW), Nikolay Dragomiretzky (ND), Ivo Traykov (IT), Folkert Schmidt (S), Manfred Fahrner (MF), Stefan Schwellinger (SS), Stefan Fuchs (Stefu), Thorsten Pockrandt (TP), Lada Martinkova (LM), Jana Hlouskova (JH), Thierry Van Kerckhoven (TvK), Alfred Jager (AJ), Jan Visser (JV), Jan Busser (JB), Marianne Kleingeld (MK), Kurt Kyck (KK), Sabine Krattiger (SK), Esteban Marijuan – Requeta (EMR), Milan Sklenar (MS), Sebastian Schormann (SS).

Date: 30-11-2017

Document: Draft Minutes 78th EERA meeting Düsseldorf

Welcome

Approval of the draft minutes 77th EERA meeting, Greece, 28-09-2017.

Please notice that most links (referring to EERA website) will guide you directly to the new EERA members' site. So, please log in first and only available from 02-01-2018.

Action points:

- 252: Letter to commissioners, sent out on November 23.
- 253: GDPR- Mr. Korremans will give a presentation today.
- 254: Request for participation by members in TC 10, (mandated to Cenelec) to design standards for ecodesign and recyclability. This is the link between ecodesign and EoL, so it is important for recyclers.

UNU study – Jaco Huisman

Jaco Huisman presents the preliminary results of the UNU -EERA study economics of compliant recycling. This presentation will not be published before the final results are formalized.

EERA members were invited for a new total anonymous survey on costs of proper treatment, because the results are very interesting, but based on a very thin total amount of responses. The survey will be sent to all EERA members on November 29. The deadline for filling out the survey is December 10. The EERA board members make a strong appeal to EERA members to share information in this anonymous survey. NZ explains that these results finally could help all members in their negotiations with producers and TBS. It makes transparent the realistic costs of compliant recycling and the loss of values by scavenging. The idea is to do a short survey on an annually base, so EERA will create statistics on costs of compliant recycling. Communication strategy is discussed by the EERA board members, and foreseen is : Press release around January 2018, Congress invitations: Circular Materials Conference, Gothenburg, Going Green Care Innovations , Vienna and by organising a joint invitational meeting with producers, TBS & recyclers and last but not least sending the report to the EC.

Prosum secondary raw material data.(prospecting secondary raw materials)

Jaco Huisman informs EERA members with the outcomes of the Prosum secondary raw material data, (Market related information) which will be available in 2018. Over 800 different sources. This project will be continued in a new project: ORAMA, main objective is to work on quality of data and input from MS. WEEForum is working on a business model for maintenance.

NZ adds that he has already made the recommendation to link Prosum with art 15 Database, information for recyclers.

[Link to ProSum](#)

Letter to commisioners- Chines National Sword Program, November 2017

EERA secretariat has sent a letter to the commissioners of DG growth and environment. The content of the letter is presented and was shared with all EERA members before sending.

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Action: sending to press and publishing at EERA website.

[Letter to Commissioners- Chinese National Sword 2017](#)

Timeline EU: October 2017

NZ presents the timeline of the EU. The time line can be found at the EERA website: EC.

[Timelines EU 2017-2018](#)

Cenelec

NZ creates awareness for the collection and logistics part of our business. In the Netherlands there are initiatives to create private standards on logistics and collection, while Cenelec also published a standard for collection & logistics. (TS 50625-4)

WT Bref

On 19-20 December there is a final meeting. Please inform EERA secretariat in case you are participating. Once the Bref is adopted it needs to be included in permit requirements in each MS.

[Link to pre final text WT bref November 2017](#)

EERA board focus topics:

1. EERA board focus topics:

- higher volumes RB, KK
- Good quality: JV, MC
- Reasonable margins: AW, SK
- Fair competition: NZ, CS & RB

Higher volumes:

KK shares his first findings on the focus topic higher volumes.

To find same recommendations for all MS is hard. Higher volumes in all MS is not easy to achieve. Main relevant remarks are:

- How MS are targeting and reporting data on volumes is a focus point. EERA members should address information from their MS to EERA board. Focus on better reporting by MS could increase the volumes.
- Retailer participation in TBS, a visible fee could be a part of take back system.
- Mandatory handover to PRO's and mandatory handover to certified recyclers.
- Develop public awareness for proper treatment.
- EERA should demand for mandatory standards.
- Reconsider the possibility of an open scope, but be aware of the risks of the open scope approach (the material could go to scrap dealers)
- Focus more on B2B volumes
- Volume clauses in contracts: EERA members should focus on secured volumes.

NZ shows the slide of UNU survey with the following question: *How do you judge the quality in your MS?* The response on this question is: 6 very poor, 5 poor, 3 sufficient and 3 excellent. There is a possibility to make an estimated report of volumes. In Portugal they take samples at car shredders and make an estimated volume which is reported. EERA members should address information from their MS to EERA board.

The board members are advocating that members should fill out the total anonymous survey part of UNU study, which will be sent out by the end of this week. The deadline for response is on December 10.

2. Good quality treatment: .. if we are paid for.

JV shares what he and MC have prepared on this focus topic.

- Standards mandatory in EU
- Communicate Cenelec
- Producers ERP must support this idea
- Will volumes in compliant recycling grow?
- Should all members of EERA have a WEEELABEX/Cenelec certificate?
- Members should comply

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- If not in line with Cenelec, no longer accepted?
- Need of a level playing field
- Enforcement is key to control

- Treatment only 15% of the total cost of WEEE.(source: last meeting EERA stated by MC, is this proven?)
 - We should make this clear to all actors in the chain
 - Logistics and collection costs will be more important
 - The value of the material is dropping
 - If volumes are guaranteed at high level, the recycling can be more efficient.
 -
- Development innovations
 - New products with complex materials
 - Market development like Chinese national sword.

ACTIONS:

- Overview EERA members and WEEELabex or Cenelec certified.
- May be EERA should revive the connection with Impel, to cooperate in the request for improving the enforcement
- Create awareness at EC level that WXO has done a lot of efforts, but the building is shaking, while certification is still only voluntary based.
- Meeting with EURIC, and WEEEFORUM. RB will take the initiative to discuss were EURIC stands for and to point out common values.
- TBS are contracting social working groups and take over more and more depollution tasks. Recyclers have to take care of their business. EERA should create awareness fort his among recyclers.
- Create awareness that recycling rates are not always achievable. CRT recycling rate is 85%. Most achievable in future is 60% due to not using lead glass anymore in future.

3. Reasonable margins: SK, AW

AW is giving feedback on the focus topic reasonable marginsand shows the presentation he and SK prepared. Reasonable margins are not discussed among members. What is important is to have transparency in the flows.

- Transparency of money flows
- Make visible fees more transparent
- And which % is spent on recycling
- Concept of indexation yes or no?
- Misconception of business earnings
- Make visible what is needed for healthy business
- Invitational conference
- Mapping of all innovations needed in near future.

An important topic in this area is the need of a good plastics index. EERA proposes that reporting on prices could go into a real black box on the new EERA website. The EERA board shares the view that it is a difficult to manage a good index. Euwid is an ideal partner for neutrality.

ACTION: EERA secretariat will contact EUWID.

4. Fair competition:

- Illegal export- action: EERA
- WSR
- NSRR
- Art 10 WEEE directive
- Link with other associations

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- WEEForum, EERA, El Kretsen, Stena and Sims will organise meetings with the Nordic Governments to call for mandatory standards, in March 2018. The idea is to continue this process in other countries.

ACTION : Joint visit to Governments to discuss compliant recycling. Indumetal is interested in such an initiative in Spain.

Presentation Paul Korremans GDPR expert, Comfort Ia.

The presentation is sent to all EERA members and can be found at the (new) EERA website. EERA meeting Düsseldorf, November 30, 2017.

[Link to Presentation GDPR 2017- P. Korremans](#)

In this new regulation one of the key stones is the importance of what role (controller or processor role) you have regarding the equipment or data. The controller has to state the requirements for data deletion tot he processor.

Some main remarks and advises to recyclers are:

- Accountability: transparency is important in this regulation. Check your privacy statements.
- Realise that the rights for individuals are strengthened.
- If you are sitting on critical data create a team.
- Make a security risk analyse
- Make a privacy plan - proof the authorities that you do so
- Create awareness for the workers
- Bring data processes in a register
- Make a data breach procedure
- Appoint a DPO (Data Protection Officer) mandatory for controllers and processors, by governments and organisations with large scale categories processing
- Make a DPIA (Data Protection Impact Assessment) on high risk processes
- Introduce privacy statements

Chris Slijkhuis – Update on the world of Plastics

An important message is: There is no added value for analysis – there is need to secure that by end of processing the results are RoHs and Reach compliant. Please notice that Bromine is not a hazardous substance. Threshold for octas 0,3% and deca bde 25% : these will never be reached, so WEEE plastics will never be hazardous.

CS presents:

Fact Sheet Brominated Flame Retardants Part 1 – Elemental Bromine

- Largest Elemental Bromine stock are the seas and the oceans 65 Gramm per Cubic Meter of sea water (even 5 Kg in the Dead Sea)
- Bromine is mainly found in salts (as anion) and is not hazardous Our human daily intake is 2 to 8 Mg
- Elemental Bromine in WEEE plastics is often > 5 000 ppm*
- CeleneC simplified approach > 2 000 ppm elemental Br. Below which the plastics can go anywhere
- Above which the plastics have to go to special facilities that separate BFR containing plastics
- No need to do analyses if material goes to these specialized facilities (no added value)
- Elemental Bromine is not a measure for defining plastics with BFR as “POP” containing material.

* Düsseldorf, 30 Nov. 2017 Chris Slijkhuis

* Study: Stoffflüsse im Schweizer Elektronikschrott PDF-Download www.bafu.admin.ch/uz-1717-d

Fact Sheet Brominated Flame Retardants Part 2 – Which BFR's are restricted?

Most Brominated Flame Retardants can still be used and are not restricted

- Penta-, Octa-BDE and HBCDD account for 8% of BFR's in WEEE*
- Deca-BDE for 22%, but thresholds are not fixed yet*.

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All PBDE's are not used in EEE since 2004 (RoHS)

- Hence they can hardly be present in Flat Panel Displays

Analyses of BFR substances/congeners are expensive

- Not required if delivered to a specialized plant
- No added value for anyone – refer to Swiss Study*

Often notifications are required for WEEE plastics

- But WEEE plastics with BFR's are not hazardous
- Thresholds for hazardousness for Octa-BDE 0,3% and for Deca-BDE 25%
- These values cannot be found in WEEE plastics
- PBB's and Penta-BDE cannot be found in WEEE and HBCDD only in EPS (expanded PS).

ACTION: EERA secretariat will contact Mrs. Sina Kummer, with the request to make a statement during the IERC 2018.

Find these factsheets made by Chris Slijkhuis at EERA members' site: [Fact Sheet Brominated Flame Retardants](#)

Fast track notifications:

- Participants: NL, Fla (BE), Fr, UK, AT, NL
- Telephone conference call early December
- Physical meeting January/ February.

The EC , DG Env. is working on an Electronic Data Exchange. The First meeting was on 28-11-2017. The current situation is that only a few MS have a database for exchanging information between MS.

EPEAT- green council in USA

EERA secretariat has participated in a conference call with EPEAT. EPEAT works with different levels of members: gold, silver and bronze members and one of the aspects is the quality of recycling.

EPEAT already recognized the WEEELABEX standards, and now they are implementing the new EN 50625 series (Cenelec standards). Remarkable is that they have recognized the whole series.

For recyclers it is important to know that once a producer requests a certain certification or audit, the recycler can just refer to their WEEELABEX or Cenelec certification. EPEAT is prepared to help

WEEE Forum EERA B2B meeting, November 22

Both organisations are working on recognizing mutual interests. Common interests and actions that have been established are:

- Awareness of the importance of compliant recycling
- Joint visit to the Government of Sweden, in order to promote to make standards mandatory
- Development of a joint flyer or leaflet with short but clear message on the transition to Cenelec
- Invited workshop for producers, TBS and recyclers. Topic: costs of compliant recyclers (end 2018).
- Focus on plastics and target is a joint position.

WEEE Compliance exercise, final workshop October 24:

Background: EC contracted Bipro to find out the best practices in the whole WEEE chain in the MS of European Union. The presentations shared during this workshop and short summary of the recommendations in the preliminary report and comments made by EERA can be found at new EERA members site WEEE compliance exercise can be found at the new EERA members' site: [Link to presentation WEEE Compliance Promotion Exercise 2017](#)

EERA secretariat will send these comments on the preliminary report before the deadline.

Reports from countries:

Germany

Recast TA Luft. – it will not be pursued for the time being because it is too complicated.

The Behandlungsverordnung- Elektro G: the government may create a Directive for treatment of WEEE. UBA made a proposal after 17 meetings. MF has frequently asked for alignment with Cenelec. The

Behandlungsverordnung demonstrates that there are a lot of misunderstandings in the law. The Elektro G 2.2.

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is an improvement . An example is the misunderstandings around the definition of first treatment operator. The good news is that the limited values are taken from Cenelec in the Behandlungsverordnung. Germany has a register of treatment facilities. This could be an idea for EERA.

An overview of the new Behandlungsverordnung can be found at the new EERA website: Germany.

[Link to EERA website: germany - documents 2017](#)

CS offers that where the flame retardants are on the German agenda, he is willing to help. SS is sharing information about the DIN group- Ecodesign and an informal workshop, BSH was also taking part (Christian Dworak). Pre documents already exists and mainly producers were involved, no recyclers. DIN is asking for a fee of 2.000 euro a year before you can comment on draft documents. DIN is also a member of Cenelec. NZ shares that Cenelec TC 10 is working on an enormous speed. The decisions are being made in TC 10, are on EC level and EERA members have be asked to participate in TC 10.

Miscellaneous:

1. The new EERA website is under construction: the new website will always be compatible for all your devices, more interactive with registration tools for meetings and events. The costs for the website are much lower than before.
2. NB Please notice that all EERA members will receive an invitation with new log in information at EERA members' site, before the end of December.
3. Please fill out the survey UNU will send out before December 10
4. EERA dinner Salzburg: bring walking shoes and we will surprise you with a small guided tour through Salzburg to a nice new restaurant owned by fam. Brunnauer.

ACTION: EERA will send out an invitation for EERA meeting, tour and dinner. Please register a.s.a.p.

Data in EERA meetings 2018

- **Tuesday January 16 Salzburg , 79th EERA meeting start 13:30 hrs**
- **Thursday March 22 Amsterdam Schiphol: General Assembly and 80th EERA meeting**
- **Wednesday May 30 Sweden Halmstad: 81st EERA meeting**
- **September 20, France, Location to be decided, 82nd EERA meeting,**
- **November 26, Vienna, 83rd EERA meeting (November 26-29 , Going Green Care Innovation in Vienna: November 26-29)**

Actionlist:

No	On-going actions	Who	Time	Status
207	Article for consumer organisations (Send out by EERA members in each country)	All	2015	Has not resulted in concrete data. Action point closed
210	EERA members will provide EERA with lists of press contacts in WEEE business in Europe.	All	February 2015	Information from EERA members is awaited. EERA Secretary will send out a reminder
240	Recruiting new members	All		Follow up by EERA secretariat
244	WEEEFORUM - EERA B2B meeting	EERA Board	Winter 2016	New approach agreed upon 3 by 3 B2B
248	UNU study Business models		February-December 2017	Decision on member states Installing of a steering committee Commitment from EERA members to cooperate in the survey
249	Recovery of Rare Earth Elements (REEs) from magnetic	EERA secretariat	February 2017	Information to EERA members



	waste in the WEEE recycling industry			
250	Filling out surveys phase 2 UNU study	All EERA members	July 14	
251	Input on EERA position paper art 15 WEEE Directive- information for recyclers	All EERA members	September 2017	Re- sending to EC, Maria Banti and Bettina Lorz.
252	China National Sword Program: EERA will prepare a draft document for EC- DG Growth	EERA secretariat Approval from members	November 2017	
253	GDPR regulation First draft lines of thoughts On the agenda for next meeting, November 30	EERA secretariat	November 2017	
254	Participation in Cenelec workinggroup 10- ecodesign	EERA members	a.s.a.p.	
255	Overview certified EERA members	EERA members- LS		
256	Contact Impel, improving enforcement	EERA secretariat		
257	Meeting EURIC, WEEEFORUM, EERA	RB	March 2018	
258	Joint visits to Governments in MS, to call for mandatory standards	EERA board	Sweden: March 2018	Sweden, Spain
259	Contact EUWID- managing plastics index in black box system	NZ		
260	Presentation GDPR to all members	LS	November 2017	
261	Recommendations to Bipro WEEE Compliance promotion exercise	NZ	December 2017	
262	Survey UNU study- participation by EERA members	EERA members	Before December 10	
263	Contact Dr. Simmer – UBA about BFR statement	NZ	December 2017	