



14th General Assembly Amsterdam =Schiphol Marc 22, 2018

Attendees: Rasmus Bergström (RB), Chris Slijkhuis (CS), Kurt Kyck (KK), Sabine Krattiger (SK), Marius Costache (MC), Stefan Fuchs (SF), Kevin Garcia (KG), Manfred Fahrner (MF), Thierry Van Kerckhoven (TvK), Esteban Marijuan Requesta (EMR), Tom Caris (TC), Patrick de Ligt (PdL), Norbert Zonneveld (NZ), Lida Stengs (LS).

Rasmus welcomes all for the 14th General Assembly. The draft minutes of the 13th GA are approved.
[Click here and log in for ppt GA 2018](#)

Review 2017:

NZ gives a review of 2017. The baseline of the business plan for 2017 was built on better focus on 4 pillars:

- Higher volumes
- Good quality
- Fair competition
- Reasonable margins

[click here and log in for ppt with overview 2017](#)

Overview speakers invited by EERA in 2017:

- Mrs. Bettina Lorz and Mrs. Maria Banti – EC, Transparency financing system in WEEE
- Prof. Dr. Michael Oehler - CEO SecureCalc Systems, EUWID project "European PS/ABS-Index"
- Dr. Lisa O'Donoghue - ALR Innovations Limited, REVOLV integration of robotic technology for recycling of LCD displays.
- Dr. Jaco Huisman – UNU, EERA study: Economics of WEEE
- Paul Korremans - Partner Comfort-IA, Impact GDPR regulation for recyclers and proposals how to anticipate?
- Mr. Evangelos Kyritsis - Ministry of Environment Greece, the Hellenic recycling Agency, WEEE management in Greece.

It is worth mentioning that Chris Slijkhuis gave very often updates on plastics. The latest efforts are related to the SIWG Group, to convince BIPRO charged with a research on thresholds of BFR's, before the next COP meeting in 2019. [click here and log in to find the documents BFR related to realistic thresholds for WEEE](#)

Initiatives in 2017:

1. Brochure European standards for WEEE, adopted by Cenelec and published by the EC. (January 2017) [Click here to find the brochure European standards for WEEE](#)
2. UNU- EERA study, Economics of WEEE (2017-2018)

The outcome of the UNU study was very acceptable and very clear and well understood by different stakeholders. It took a large amount of the EERA reserves, but now we have to make profit of it. EERA members are invited to spread the word, and please use the figures as a lobby tool. You are invited to discuss with all stakeholders in your country and express what the main conclusions and recommendations of this study are. EERA will provide members with a public report and a flyer with infographics to disseminate the main conclusions. The first draft can be found at the website and will be replaced by the final document soon.

[Click here and log in at members'site to find the report and main conclusions](#)

Main conclusions UNU study:

- The effect of avoided compliance costs is much larger than margins:



14th General Assembly Amsterdam =Schiphol Marc 22, 2018

- Avoiding reporting reduces operational costs with +/- 20%
 - Avoiding depollution and waste disposal reduces operational costs with +/- 50%
 - The losses associated to scavenging of components are substantial:
 - Up to 70 €/t, EU28+2: +/- 170 million €/yr
 - The elephant in the room needs to be quantified as well
- Technical requirements should come prior to pricing quotations!

Ideas:

- Responsible negotiating:
 - Technical and Financial offers could be f.i. 70/30 or 60/40 in procurement contracts
 - Share best contracting practices and mechanisms!
 - Develop a scavenging index; include impact of in (€/t) directly in pricing discussions
- Research:
 - Repeat the collection quality survey annually to determine scavenging levels
 - Incorporate a standardised product count when running batch tests
- Report and communicate:
 - Report anomalies on a recurring basis to inspectorates (f.i. compressors)
 - Request an Annex VII reporting requirement at Member State level

EERA decided to repeat the scavenging index in 2018.

EERA members :

- Resignations by Ilunion, Praxy, Enviropol, ICT Ireland.
- New member: Environnement Recycling

EERA membership

EERA secretariat increased the level of services and the number of members is decreasing. In general the companies that are a member share the vision on proper treatment. Members are willing to share information. The board discussed this also and will review their findings and assumptions during the EERA meeting. EERA will also reconsider to create a more open scope for membership and differentiated fees. Please inform EERA secretariat in case you would like to share your views.

Approval of the annual report:

The annual report is approved and the board signs the Annual report 2017 during the GA.

Business Plan 2018:

Main issue is that problems are mostly the driver for actions in the world of WEEE. The target of 65 % will not be met by 80 % of the MS in 2019. The second problem is (Empa, Switzerland did already research and SK explains about this study) that there are already measured data that the recycling rates can not be met, because of the value of the materials and the mixes in the plastics. Recyclers should approach this from the top. This is not only the recyclers problem and the EC is still focussing on the compliance exercise. During the board meeting the idea (KK approach) is discussed to invite the EP members at our plants in their homeland, during the summer holidays. It is of importance that MEP's are well informed about the situation and the current financing system for recycling of WEEE. Topics to discuss with MEP's are: Reporting on estimated volumes still exists and we now we have figures which proofs what the advantages are. EMR: We have to advocate that estimated volume reporting will support the creation of the unlevelled playing field. TBS had collected lot of money by the visible fee. They are aiming for re- introducing of the visible fee. It is often very intransparent. We



14th General Assembly Amsterdam =Schiphol Marc 22, 2018

have to focus on more transparency in the financing system. These estimated volumes are not in the scope of the objectives of the WEEE Directive. It is unfair and makes avoiding of a lot of costs possible.

ACTION: EERA secretariat is working on a small brochure (4-5 papers) with the main results of the UNU study.

Proposals for 2018 are:

Related to higher volumes:

- Creating awareness by informing members and European Commission, European Parliament, MS, Producers, Take Back Systems - TBS and other stakeholders that meeting the collection targets must be a priority.
- Advocate EERA's position that reporting on estimated volumes is in fact a support for the creation of an unlevelled playing field.
- Focus on approaching a higher level in the EC to advocate EERA's position.
- Meet European Parliament members and inform them about threats and ask their help to improve the situation.

There are more and more signs that producers and takeback systems would like to reintroduce the visible fee. EERA could embrace this idea but the transparency of financing should be preconditional.

Related to good quality treatment:

- Dissemination of the information of Economics of compliant WEEE treatment by making presentations - IERC, Circular Materials and Going Green and a brochure which can be distributed on paper as well as digitally;
- Making the EN standards legally mandatory in all MS by means of implementing acts (art 8.5 of the WEEE Directive) by lobbying at EC, EP and MS level. Lobby together with other supportive stakeholders (WEEE Forum, DE, Applia and alike)
- Organize a round table for the Nordics and follow up bilateral meetings.
- Consult EERA members to find out if a round-table meeting on standards is desired in other regions.
- Suggest to MS that inspection authorities can follow the training on the EN standards at the WEEELABEX organisation or online.
- Give follow up to the Scavenging Index by repeating the study among EERA members in 2018. Disseminate the findings.
- Legal requirement to meet the recycling and recovery targets
- Collect evidence targets are not met for the product categories IT and SDA.
- Collect information on presence of Li-on batteries in IT and SDA.
- Lobby on practical limits values for POPs in recycled post-consumer plastics. Make a leaflet, which explains what the issue is on BFRs and POP in WEEE plastics

Related to fair competition:

- Lobby with TBS (especially the WEEE Forum) and producers that in the tender documents a prerequisite for contracting treatment operators are EN 50625 certificates. If TBS and recyclers agree on this publish list. It is a strong signal to the authorities and may lead to mandatory standards in MS.
- Create awareness that non-compliant operators do not act in good faith and are undermining EU strategies like the action plan on Circular Economy.



14th General Assembly Amsterdam =Schiphol Marc 22, 2018

- Lobby at EC and EP level that proper treatment outside Europe (article 10 of the WEEE Directive) means compliance with EN standards.

Related to reasonable margins:

- Now that the economic outlook for new EEE is better the efforts on securing reasonable margins should remain on the agenda.
- The race to the bottom must be turned over into sustainable business practices.
- Compliant treatment according to standards and scavenging should be part of contracts for services treatment operators.
- Create awareness among EERA members and assist them in making this theme negotiable.
- Cooperate with the WEEE Forum with the aim to publish on a European scale the TBS that made contracts with certified recyclers
- Disseminate the Scavenging Index.

What is EERA?

- It is important that the recycling industry gives feedback on how realistic some of the ideas are and what could work and what not. For an individual company it is impossible to follow the complexity of the different legislative areas like REACH, POP's regulation, RoHS, Waste Shipment Regulations, BREFs, Eco-design Directive, WEEE Directive, Data Protection Directive and alike.
- An active association where members inform each other and where experts are invited to share their knowledge on highly specialised topics is essential for companies to judge what the impact is or could be on their daily business
- As an association it possible to express the views and opinions on sensitive issues without direct exposure of individual companies. It is sometimes essential to have a rebuttal to issues which are unfair or straight forward wrong, especially if the balance of power is one-sided.

Pan European ← → Regional organisation:

- Many issues (e.g. collection categories, monitoring and reporting, quality of WEEE treatment, governance and responsibilities of collection, transport and treatment) concerning the implementation of the regulated market for WEEE are dealt with on a national or sometimes regional scale.
- New regulation (RoHS, REACH, WSR, Eco-design), research and development, subsidised projects (Horizon 2020), evaluation studies, standard development (Eco-design, collection, logistics and treatment) are taking place on a central level.

So, several members are more interested in the actions on regional level, while others would like to see that the efforts of EERA are focused on the central level. With the limited budget of EERA it is impossible for the Secretariat to be involved on both levels in full extend. EERA should start a dialogue what should be done and what structure fits best with the wishes of the members.

A discussion is started on the risks of fires in our plants. How could we link better with general waste organisations? Equipment has very often no more cable connection, but hidden batteries in the products (Dyson). Lithium batteries are the biggest threat for our operations. ADR regulation is there but it does not solve the problem. Where are the sources for this kind of information and all the risks in new products? The batteries recycling can also be the key to improve the recycling targets for compliant recyclers. TBS make contracts with social services who to take out the bateries. EMR: EERA has to collect data and start the discussion with EBRA etc.



14th General Assembly Amsterdam =Schiphol Marc 22, 2018

EMR: The development of EERA took a lot of time to get a common view. Now we have the focus and we have to stay focussed on certain topics. MF agrees on this. We did not think on that many members when we started and we focussed on the WEEE Directive. The MS fee of 7500 euro is a lot of money and that is why we should focus on certain topics and we have to realise that the list of activities that we have done is impressive. This does not mean that we can not attract other recyclers.

RB is referring to the round table in Gothenburg, based on a couple of problems to tackle. We have to define the problems in each region and have to work in smaller groups. In the beginning there was an hot issue: the WEEE Directive.

TVK: we should stay focussed- and we should not become an association of associations. The only possibility he sees to expand is to incorporate the car recycling business (not the metals recycling). Cars are WEEE on wheels. EERA members are expressing their concerns because this group is much larger than we (WEEE) are.

TC: we have to make membership conditions otherwise we should loose our values very soon. Our scope will be larger and larger, but opening the scope is dangerous as well. EMR: the interests of big car shredder are totally different. We have to be very clear about the conditions and the current membership conditions represents what we stand for.

RB: Do we really would like to increase because of the the money or what do we want to achieve as electronics recyclers? The reality is that we have parts of the car recycling, in our business, but today I will not support to incorporate the car recyclers in the association because the danger exists to be eaten. We all have our own regional challenges. We should focus on the most important issues. Make standards mandatory is for now the main focus and pick two other issues: plastics and batteries. This will keep EERA a strong organisation with a clear view.

Extra costs (and incomes) in the budget are for 2018: The scavenging index (extra costs) and Cewaste project (Horizon 2020 fund submission, not granted, yet). NZ explains that a budget of 200.000 euros is the bottom, so we are on the critical side as an association.

The members approved the business plan and budget for 2018.

EERA Board

Board election

Candidates for the vacancy in the Board are Marius Costache and Esteban Marijuan Requesta. All members received ballot forms and Kevin Garcia was prepared to take the roll as Chair of the Voting Commission.

Extension of the board membership from 2 to 3 years.

The members agreed with the change of article 16 – Board of Directors in the Articles of Association to extend the term of board membership with one year and in total 3 years. Board members are re-eligible.

Closing of the GA

RB thanked the members present for their contributions in this fruitful GA.