



Article 15 of Directive 2012/19/EU

Proposal of EERA for improved exchange of information for recyclers

1. General

As a starting point EERA proposes to use the 'Leitfaden für die Behandlung von Elektro- und Elektronikgeräte' published by the Austrian ministry of environment.

Note: this handbook can be downloaded from the following website:

https://www.bmlfuw.gv.at/greentec/abfall-ressourcen/elektroaltgeraete/eag_studien.html

We propose to use 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 The risk of a paper version, like the aforementioned, is that it is static and becomes outdated when not revised in time. Such a platform could be on two levels. One available for everybody with all the basic information needed for proper depollution in line with the Directive. One with access only to recyclers that have a contract with producers or EPR schemes with access to studies, fora etc.

Apart from information provided via a digital platform we also want to stress the importance of labeling. Labeling is very interesting for recyclers on three conditions:

- It is uniform
- It is adopted early and by all
- It is easily recognisable (big logos or letters, colors; small print is not useful)

2. Information per appliance group

EERA proposes to provide information on the digital platform per group of appliances, not per appliance type. Some examples of these groups are:

- CRT monitors and TVs
- Flat panel displays
- Household cooling and freezing
- Professional cooling and freezing
- Airconditioning, heat pumps and other temperature exchange equipment



- Washing machines
- Boilers
- Large kitchen appliances
- ...

Per group of appliances we wish to have as a minimum the following information:

- Usual dangerous components / substances used (as a minimum the ones mentioned in Annex VII of the Directive) with a short description and photo
- Usual place where these are 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 for logistics (ADR) and collection (separate / mixed). It could be interesting to advise separate collection or sorting when there is a significant concentration of a specific hazardous component in one appliance group, so as to avoid dilution (e.g. hot-melt guns)
- Presence of labeling used for products with or without specific hazardous components (aligned / consistent) or with specific technology, starting when the products are placed on the market

We also propose to provide per appliance group extra information on the use of materials that are recyclable only in case certain technology is used (e.g. PMMA plates from manual dismantling of FPD).

3. Information per dangerous component / substance

EERA proposes to provide information per dangerous component / substance on the digital platform. As a minimum the ones mentioned in Annex VII of the WEEE Directive shall be given, but also other dangerous components or substances that normally occur in WEEE must be addressed.

Per component or substance we wish to see as a minimum the following information:

- Description of the component / substance and its different types (some may not be dangerous or have different characteristics)

Note: a colored structure could be used to aid recognition (e.g. dry capacitors, which



do not contain hazardous substances, could be marked with a specific color, f.i. green)

- The composition (material content)
- In which appliances it is applied (with a link to the appliances groups above mentioned)
- How to recognize and how to identify different types
- Where to usually find it in the appliance
- Dismantling tips / instructions
- Personal protection needed for handling
- Handling, storage, packaging and transport instructions (a.o. ADR)
- Examples of MSDS sheets when applicable
- Dangers when not properly depolluted

We also propose to provide advice on possibilities to sort the components or substances (when different treatment is possible for different types) and advice on available treatment techniques (without mentioning specific companies).

4. Library

EERA proposes to provide a place on this digital platform where studies on recycling and depollution of WEEE are published, with a link from the study to the applicable appliance group and / or dangerous component or substance. 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. However we find it important that these studies are reviewed by relevant experts before publishing to avoid false use or interpretation.

5. Interaction / communication

EERA suggests to provide an internet forum on this platform for exchange of information between recyclers and producers. It can for instance be used to launch new researches, launch new studies etc.



The digital platform should also be used to provide information about the requirements for plastics like e.g. Philips is currently using for their “green” products.

And finally, we propose to add a ‘contacts’ page with contact information for registered users (producers, recyclers, federations, EPR schemes,...)