



Document: Draft minutes 81st EERA meeting Halmstad, Sweden

Date: 28-05-2018

Attendees: Rasmus Bergström (RB), Sabine Krattiger (SK), Arjen Wittekoek (AW), Thierry Van Kerckhoven (TvK), Folkert Schmidt (FS), Sascha Förster (SF), Thomas Dietershagen (TD), Stefan Schwellinger (SS), Chris Slijkhuis (CS), Kurt Kyck (KK), Kai Mayer (KM), Max Kyck (MK), Marius Costache (MC), Thanos Stergiou (TS), Thomas Papageorgiou (TP), Theodoropoulos Stavros (TS), Petr Vrana (PV), Jana Hlouskova (JH), Jan Visser (JV), Giuseppe Piardi (GP), Martin Alehem (MA), Lolita Candian (LC), Giovanni Corti (GC), Sebastian Schormann (SScho), Pär Håkansson (PH), Robert Grill (RG), Jessica Ullvan (JU), Norbert Zonneveld (NZ), Lida Stengs (LS).

Welcome:

Minutes of the 80th EERA meeting Amsterdam are approved. Action list to be discussed during next meeting.

Brominated Flame Retardants – new EERA flyer:

Responsible recycling of WEEE plastics containing Brominated Flame Retardants. NZ is introducing the new EERA brochure which gives updated information on responsible recycling of WEEE plastics containing Brominated Flame Retardants. The brochure can be found at EERA website: [click here](#)

EERA members are asked to make use of these brochures. Printed copies can be asked at secretariat, soon available. ACTION: EERA will make hard copies of this brochure.

Update on plastics- Presentation CS

Chris Slijkhuis is asking members to publish the BFR brochure. His post on Linked in gave already 1.100 views. Regarding to plastics:

Far east – export of plastics out of EU to far east is getting more and more difficult. We have to handle with the ban in China, the Letter of Vietnam- shutting out scrap plastic. <https://resource-recycling.com/plastics/2018/05/31/why-vietnam-is-shutting-out-scrap-plastic/>. There are already similar considerations in Malaysia. The market on plastics in the far east is very unstable.

Many EU countries do not allow export of WEEE plastics (France) and require notifications. The debate is difficult and dynamic:

- EU export stop in France due to a decision of Ecosysteme
- Major discussions in some Bundesländer on WEEE plastics. Next meeting on 28 of June.
- Export ban of plastics out of Flanders – Belgium.
- EU asked for review of Cenelec regarding POP BFR. EERA (CS) responded that there is no need for it at the moment because there is not changed anything.



COP convention- 2019 - UN conference of parties Stockholm and Basel conventions.

Thresholds for Deca BDE are under discussion at Stockholm convention. Some NGO are claiming for a non-toxic world, based on a threshold of 50 ppm. This means that plastic recycling is not possible as an output. This implies that recycling targets will not be met anymore and the recycling industry for WEEE in EU is dead. That must be contrary to the ideas of Circular economy. The EERA paper has been sent out to secretariat proposing for DECABDE in line with the current thresholds of 1.000 ppm. (in line with REACH threshold for new products)

CS participated and represented or is representing the EERA statement at:

- Conference of POPs in Krakau
- Pop meeting Geneva (4 days)
- SIWG= Geneva October 2018, several days. (new paper is sent in)
- UNEP workshop Bratislava in December 2018.

EERA is in line with other associations, like EURIC regarding the threshold of 1.000 ppm.

CS: Once again, please make sure that the message of the BFR flyer will be used. E.g. Julie-Ann Adams will propose the described way of compliant recycling of WEEE plastics with the government in the UK.

NSRR- Fast Track Notifications.

This FTN project intends to make notifications quicker and easier, so freeing up resources and combat illegal shipments. The base is in art 14 WSR. The common practice is that notification request can be more than two years old. On June 15 the next meeting in Vienna is scheduled.

Taking part in this project: Austria, Netherlands, France, Flanders. Objectives are:

- Needed a set of harmonized business rule for pre consents
- When is a notification request to a pre consented treatment facility complete?
- Try out FTN between HKS and MGG Metran.
- Than scale up
- Propose as a model for new reworked WSR 2020.

EERA Projects 2018-2019

The EERA board has issued for 2018-2019 the following projects

- Plastics
- NSRR-FTN
- Mandatory standards
- Batteries

EC launched a study to gather the information on practice in Member States, the instruments and approaches existing and any information on experience with practical application, cost etc. EC decided not to call it an impact assessments because of all the rules and restrictions around impact assessments. The Terms of Reference document is created at this moment and we approached the WEEE Forum to organise a meeting Eurometaux and EURIC and WEEE Forum, to create a joint letter and to discuss other topics (art 10 and art 8 WEEE Directive)..

Proposed topics in the joint letter (EERA, Eurometaux) for ToR document are:

1. Costs of compliance
2. Distance to target
3. Substantiated estimates
4. Standards applicable in the Member States and equivalency
5. Legally binding

The joint letter to EC regarding the ToR for this study is published at EERA website:

<https://eerarecyclers-site.e-captain.nl/publications>

On June 19 there is an important EURIC meeting, WEEE Group in Austria. EERA is asking its' members to plea for mandatory standards.

UNU study- public version

EERA is working on a public version which will be finalized in June. NZ shows some first figures in infographics. Members will be informed once the public version is finalized. Please notice again that the study only focusses on operational costs.

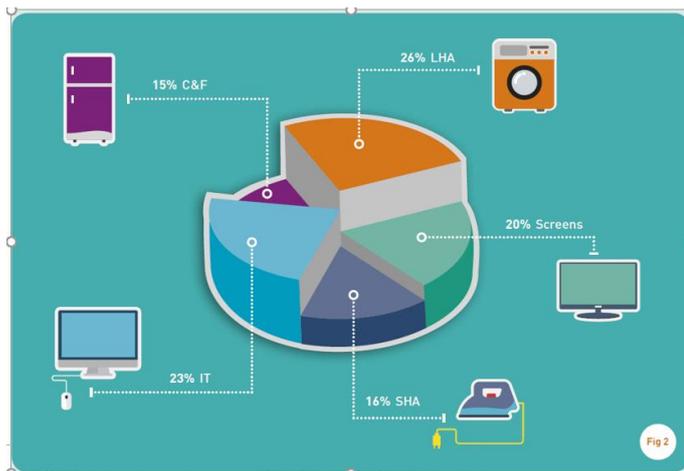
The final report (not public) is on members 'site: [log in at EERA members 'site and click here](#)

Public version will be available at EERA website. Now you can find here the presentation given by Jaco Huisman in January at IERC.

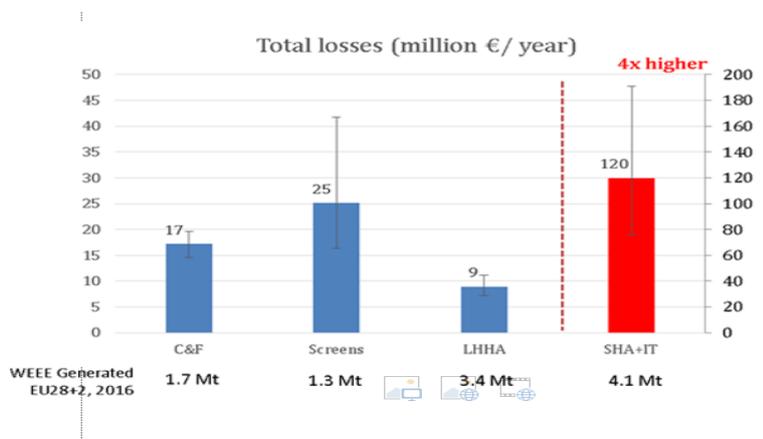
1. NZ shows a figure of the UNU study regarding under and over representation of material based on what in the figures of WEEE Generated is stated. So, we see that there is a lot of cherry picking in this business. The best products are not reaching the recyclers.



2. Another important part of the study are the scavenging of components – there are serious levels of missing parts in the material and this is quantified.



3. The outcome in general (for C&FA 1.7 mt) should come to recyclers and is lost so this mean 17 million euros a year. Because of scavenged material.



Also the main conclusions of this study are discussed and EERA members are asked to disseminate these results in their MS:

The effect of avoided compliance costs is much larger than margins

- Avoiding reporting reduces operational costs with +/- 20%
- Avoiding depollution and waste disposal reduces operational costs with +/- 50%

Recommended:

- Define technical requirements before pricing quotations!
For example: Technical and Financial offers should be 70/30 or 60/40 in procurement contracts
Include impact of scavenging level (€/t) directly in pricing discussions
 - Scavenging is very country dependent, report scavenging of compressors to officials/ inspectorates!
- Repeat the collection quality survey annually to determine scavenging levels

AW is asking for hard copies of this public version, and for an anti-trust disclaimer. LS replies that the UNU disclaimer will be used.

RB: EERA has presented three important things (The BFR brochure, Letter to EC regarding new study and the UNU study on economics of WEEE). Now we are in need of commitment from EERA members. It is important to this organisation that all members will contribute. The contributions for this study were very limited. It was not easy to get the information and we still delivered an excellent report, which asked a lot of efforts. The input needs to come from EERA members. It requires time from people in your company. For good impact we need full support.

Cooperation with UBA is important. TD will put efforts in it to get more information from them.

NZ explains the proposed follow up for this study, the new scavenging observatory by UNU. It is agreed that the scavenging observatory will be done before the end of this year. The costs are limited to €10.000, but commitment from members is needed.

Content questionnaire

This questionnaire is divided in 3 main parts:



1. General information: name of the company, countries in which it operates, number of sites, etc.
2. Quantities of WEEE treated per category (C&F, LHA, screens, SHA, small IT) on a weight basis and, for specific relevant products in each category, their share in said category (% pieces) as well as the scavenging level of critical parts/components (% pieces). The following products are considered for the scavenging:
 - C&F: Fridges & Freezers, Air Conditioners
 - LHA: All together
 - Screens: CRT (Monitors & TV), Flat Panels (Monitors & TV), Laptop/Notebook
 - Small Household Appliances & IT: Desktop, Mobile Phones, Other EEE
3. Additional information on sampling methods and reporting practices in the country concerned.

Participation is of high importance!

ACTION: EERA secretariat will provide further information for recyclers how to anticipate on the requested information by the end of this year and will ask UNU to provide the information given last year to each individual member.

Idea of inviting MEPs in your plants during their holiday in summer season.

The EERA board launched the idea to invite MEPs at recycling plants during their holidays in their home countries. All EERA members were invited to do so. EERA secretariat received one reaction.

- The idea is to create awareness for the importance of WEEE recycling and to issue certain urgent topics in an easy accessible way and an informal setting.
- EERA secretariat has already prepared some guidelines and a list of MEPs (sent to EERA members May 14).



Please inform EERA secretariat once you have invited MEPs in your plant.

EERA membership models.

The board is still discussing the EERA structure. The EERA budget around € 200.000 a year, which is needed for a sustainable association and that money has to come from the members. The board strongly believes that EERA is a lobby organisation operating in Brussels, and with other stakeholders in the market. Besides that the local level of lobbying is becoming more and more important, like EERA just did for the Nordics. Support from secretariat and from the knowledge of members is the only way it should work. The idea is risen to revitalize the technical groups: like groups for batteries and plastics, and probably for LCD's. GP: Increasing the knowledge is the key component. The knowledge in the ministries is so low, that we have to provide the needed information and we should promote WKO training for the ministries.

The meeting discusses shortly the idea of making different membership levels. In the last 14 years the membership model and fees have never changed. In such a small organisation is working with different membership levels not that easy because of administrative burdens. EERA should concentrate and continue on the lobby and we should decide for more focus on technical issues. The members should bring the knowledge.

RB is asking the attendees today (up to 31 members from 14 different companies) how to find ways to attract more people for the EERA meetings. Please give EERA input on what you expect and share your views with the EERA board by sending to ls@eera-recyclers.com

KK adds the relevance of attracting Germany and French members. The German's were once the most active members and that needs to come back. What is happening in the German market is relevant to us, so how can we make it attractive for the German market.

Going green care innovation in Vienna.

On November 27 Going Green Care Innovation starts in Vienna. [Link to Going Green Care Innovation 2018](#) EERA will participate with an EERA session of two hours and the following topics will be addressed: Economics of WEEE, UNU study, Batteries, Plastics, and Recovery and recycling rates.

To make the conference more attractive for EERA members, the board decided for an EERA dinner on November 26 (in stead of the yearly EERA dinner in Salzburg and an EERA meeting on November 26, afternoon)

See also at EERA website: <https://www.eera-recyclers.com/events>

The venue for the EERA meeting will be at: RENAISSANCE WIEN HOTEL | LINKE WIENZEILE/
ULLMANNSTRASSE 71 | 1150 WIEN, AUSTRIA

T + 43 1 89 102 809 F + 43 1 89 102 200

There is a reservation link for hotelroom reservations created: Here is the reservation link your guests can use to make online reservations: With special fee of € 109 , per night single room

[Book your group rate for EERA - International Care Electronics Office - Conference 25. - 28.11.2018](#)

ROHS 2

A new RoHS stakeholder consultation is online! A stakeholder consultation has been launched as part of the “Study for the review of the list of restricted substances and to assess a new exemption request under Directive 2011/65/EU (RoHS 2) – Pack 15” and shall be held for eight weeks from today 20 April 2018 and until 15 June 2018.

This first stakeholder consultation is related to the [Substance Review](#) part of the study and aims at collecting information on seven substances to be assessed with a view to the review and amendment of the RoHS Annex II list of restricted substances

M518 Cenelec

The letter sent (April 2018) by Mrs. Sarah Nelen, Head of Waste Management Unit EC DG Env to Cenelec is shortly discussed. Further discussions between EC and Cenelec members are still going on. It is the responsibility of EC whether the standards are beyond the WEEE directive and not a question for Cenelec.

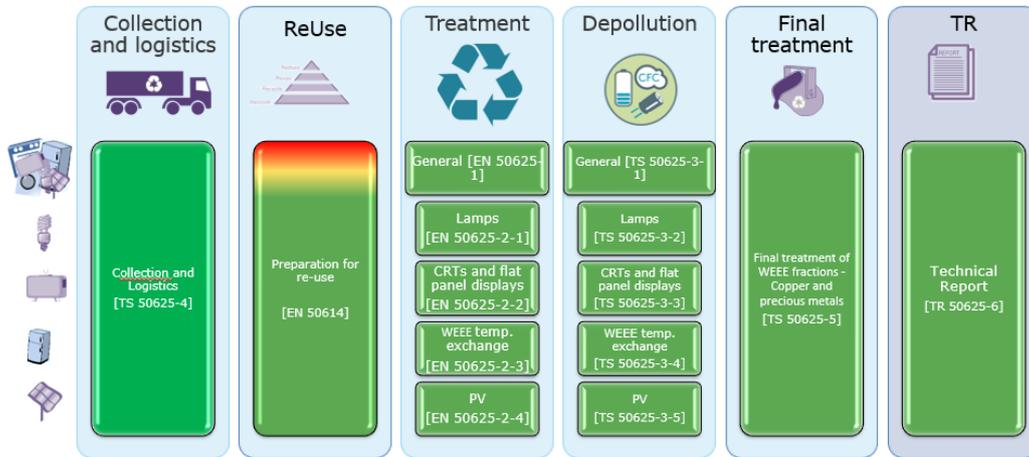
Mrs. Sarah Nelen confirmed that the mandate is still for the coming reviews. The reviews have already started. Most important parts of this letter are:

- Pursuant to Mandate M/518 the Technical Report (TR 50625-6) on the alignment between Directive 2012/19/EU on waste electrical and electronic equipment (WEEE) and the EN 50625 series of standards should **clearly distinguish the additional guidance given to operators beyond the level of protection requested by the WEEE Directive.**
- The draft Technical Report, discussed so far, contains only a general description of standardization deliverables and their normative or informative nature, and a list of the applicable standards for each of the provisions of the WEEE Directive.
- We consider important that the Technical Report brings some added value in aligning the provisions of the EN 50625 series of standards with the Directive 2012/19/EU.

We consider **that the revision of the standardization deliverables under Mandate M/518 is still covered under this Mandate**

All Cenelec standards under EN 50625 series are published (except. re use). The review process has started, so bring your concerns and issues that are wrong to your National committees.

Status overview of European Standards for WEEE



Status: February 2018

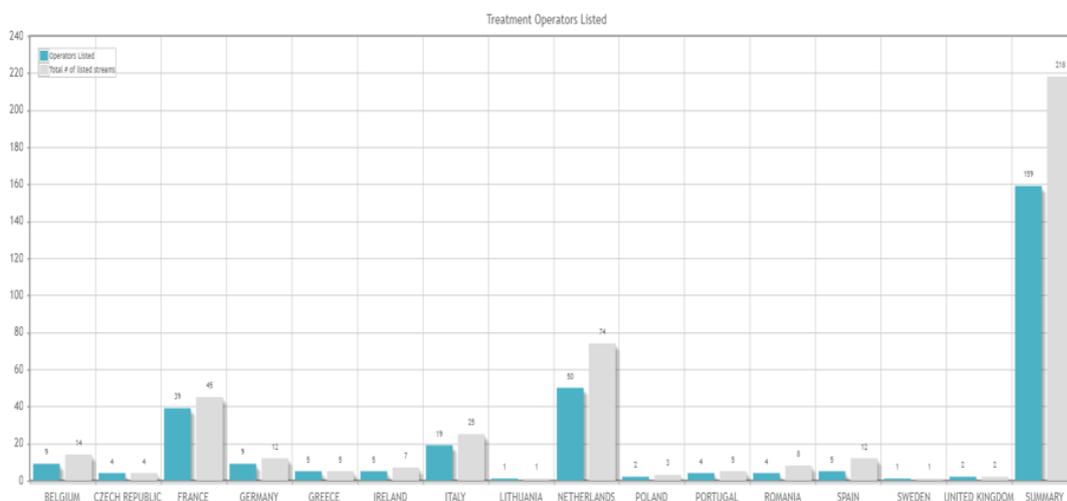


Cenelec Eco-design:

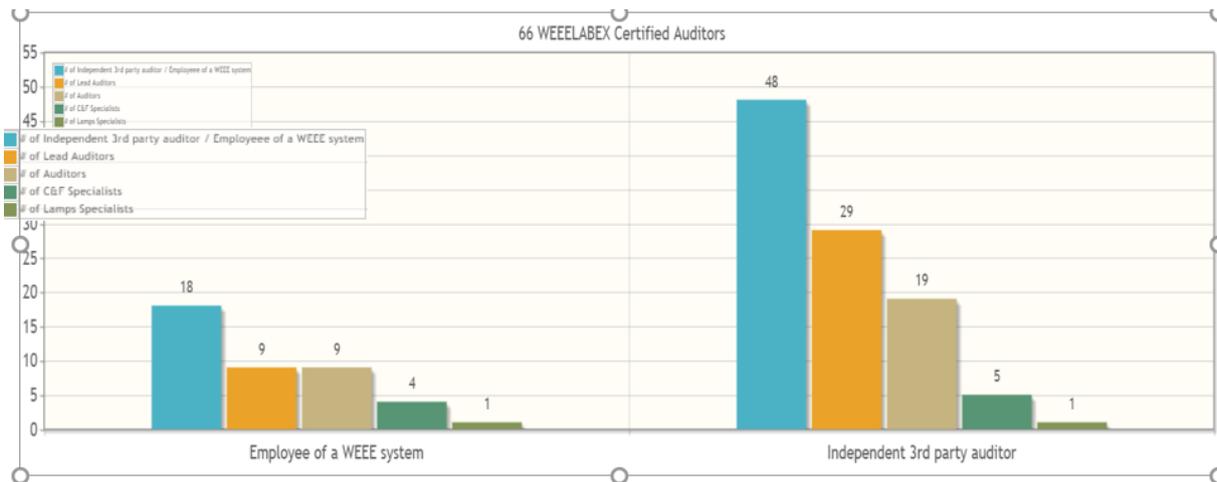
The progress is published on the EERA members 'site. But to be honest, we are only following the recyclability issues. CS reacted on post-consumer and pre consumer discussion. SSchor expresses the importance for recyclers, but we all can not find time to dive into these discussions.

WEELABEX monitoring

NZ shows the progress on WEELABEX certified operators per country.



Also the list of WEEELABEX auditors is still increasing:



- **2nd party auditors** (employee of WEEE takeback systems): **18**
- **3rd party auditors** (independent auditor): **48**

Request from FEICA: The Association of adhesive and sealant industry.

Open invitation, sent to EERA members by mail (03-04-2018), but EERA members did not respond. SSchor: thinking about design for recycling, is important, but it is difficult to give a single view from EERA members, because we all have different facilities. Producers have to think how their products can be recycled before they bring it on the market.

ACTION: Thomas Dietershagen (TD) is willing to guide and join EERA secretariat on this topic. He realises that this exercise will be a good publicity for glue association but the outcomes will be low.

E waste day

The WEEE Forum decided to organise an E- waste day with different activities in different countries and TBS organise activities in the week of October 13. EERA secretariat is asking if EERA members are interested in participating in this E -waste day and to open the recycling plants for consumers.

ACTION: EERA secretariat will contact WEEE Forum for more details and how to organise, because the timeline is already short.

Next meetings:

- There is a plant visit scheduled to Environnement Recycling <http://www.environnement-recycling.com/>, on 25 September 2018. EERA members are invited. Details will be sent later.
- **Next EERA meeting is on November 26 in Vienna.** <https://www.eera-recyclers.com/events>
Please register directly at EERA members' site. Book your hotel room at Renaissance Wien Hotel for € 109 euros per night (single room) by using this link:
[Book your group rate for EERA - International Care Electronics Office - Conference 25. - 28.11.2018](http://www.riehotels.com/Book-your-group-rate-for-EERA-International-Care-Electronics-Office-Conference-25.-28.11.2018)

Actionlist:

No	On-going actions	Who	Time	Status
240	Recruiting new members	All		Follow up by EERA secretariat
254	Participation in Cenelec working group 10- eco-design	EERA members	a.s.a.p.	
255	Overview certified EERA members	EERA members-LS	November 2017	
264	Communication activities UNU study and continuation of UNU study on the EERA agenda.	EERA secretariat	January 2018	
265	EERA secretariat will ask UNU to establish a protocol on what can be monitored on a yearly base.	EERA secretariat	January 2018	
267	All EERA members are invited to share their proposals on how EERA should be going forward. Mail your suggestions, wishes and ideas to Bergström Rasmus: rasmus.bergstrom@stenametall.se	EERA members	January 2018	
268	secretariat will prepare a proposal for changing the board membership period.	LS	January 2018	
269	EERA board will prepare first concept for the EERA session during Electronics Goes Green Care innovation, Vienna, all members are invited to step forward with idea for presentations.	CS, EERA board	January 2018	Deadline February 2018
270	Infographics document BFR	EERA secretariat CS	January 2018	
271	Proposal to organise a round table session in Spain	EERA secretariat	Spring 2018	
272	Information questionnaire: Scavenging observatory to members	EERA secretariat		

273	Thomas Dietershagen will give some guidance to FEICA (Gluing and sealing association)		Spring 2018	
274	Invitation of MEPS in plants during summer break	All EERA members	Summer 2018	Inform EERA secretariat once you have made an appointment
275	WEEE Forum E waste day	EERA secretariat & members	Around October 13	More information is needed
276				

