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Document: Draft minutes 76th EERA meeting
Date: 29-06-2017
Location: Umicore office, Broekstraat 31 Brussels.
Attendees: Manfred Fahrner (MF), Arjen Wittekoek (AW), Chris Slijkhuis (CS), Thierry Van Kerckhoven (TvK), Christian Hagelueken (CH), Nikolay Dragomiretzki (ND), Ivo Traykov (IT), Kurt Kyck (KK), Sabine Krattiger (SK), Dirk Roch (DR), Stefan Fuchs (SF), Kevin Garcia (KG)
Invited: Maria Banti (MB), Bettina Lorz (BL), Jaco Huisman (JH)

Welcome:

The acquaintance and introduction of our new member Environnement Recycling, is postponed to the EERA meeting in Greece on September 28.
NZ gives a small introduction on the draft agenda for today and the invitation of the EC, Maria Banti and Bettina Lorz. NZ changes the program, because Maria Banti and Bettina Lorz did not arrive, yet.

Board meeting May 10:

AW is giving a short report on the last board meeting on May 10, in Düsseldorf. The board is aware of all the challenges we are facing as an industry. Therefore the board decided to work more proactive and has tried to divide the tasks among board members.
The tasks for the board are mapped and addressed to board members. The mapping is based on the 4 main topics of the EERA strategy 2017-2018:

topic	deliverables	who
Higher volumes	action plan	Rasmus Bergström, Kurt Kyck
Good quality treatment		Jan Visser Marius Costache
Reasonable margins		Arjen Wittekoek, Sabine Krattiger
Fair competition		Rasmus Bergström, Chris Slijkhuis, Norbert Zonneveld

Presentation Maria Banti and Bettina Lorz.

EERA secretariat has invited the EC WEEE policy officers, DG environment for a presentation with the main objective to create awareness for the financing system in the WEEE chain and to work on better understanding of all the challenges and threats that we are facing.
The title of the presentation given is: "Circular economy : opportunities and challenges for WEEE EPR schemes".
Bettina Lorz opens with the statement that the reason for this presentation is not only the exchange of ideas, but also the opportunity to give some background on the financing system. Transparency is becoming more and more important. (the idea exists for re-introduction of the visible fee, and this is an example of how we have to learn from the failures in the system).

The presentation can be found at the EERA members' site:
[click here \(and log in\)](#)

Short pitches: challenges and threats for WEEE industry.

NZ introduces the three short pitches and speakers which EERA has prepared for the EC and this meeting. The presentations give insight in the challenges and threats for the WEEE business.

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Jaco Huisman: WEEE Recycling Economics – The shortcomings of the current business model? Short back ground on costs.

Christian Hagelueken: Policy and societal evolutions towards recycling and a circular economy

Chris Slijkhuis: EU stakeholders consultations, proposed EERA statements to be made.

All these presentations can be found a the EERA members' site.

[click here and log in](#)

Small summary of the presentation given by Maria Banti and Bettina Lorz and the discussions meanwhile:

Action plan EU & deliverables 2017

- Plastics strategy
- Interface chemicals, products and waste legislation
- Indicators for assessment
- Pre demolition assessment guidelines
- Monitoring and indicator framework
- Minimum requirements for re-used water.

Actions related to WEEE Directive:

Art 15: information for facilities-> platform, database for sharing information. Producers have handed over a first road map. First discussion was about the scope. There are still differences in views. For EERA the next step is that the direction for the database is clear, and we as recyclers, are also interested in visible marking of products to improve automatic detection in critical products. The producers have concerns and the views are completely different. Only a database in the cloud is not the way to make information useful. It is not easy accessible and it takes too much time in the working processes. This needs a push forward. The commission is pressing on this topic. EERA is happy that producers will set up a data base. The idea of this dataset was already presented by IFixit, last year at a EERA meeting. DE looked up at this system and the idea is that this could also be useful for the information for recyclers. IFixit is not interested in doing the project. WEEE Forum is asked now. The main problem is how to keep it updated. EERA has made a position paper on this topic. We are not in need of only a database.

We didn't have a reply on the position paper from Ceced or Digital Europe. BL and MB will communicate these wishes from recyclers.

ACTION: EERA Position paper (revised version) to MB and BL, input requested from EERA members).

Background to EPR minimum requirements in waste proposals:

- EPR (role and importance),
- challenges facing existing EPR schemes in EU MS
- study to assess the implementation of EPR schemes in EU and propose guiding EPRs

General requirements for EPR schemes in relation to WEEE directive:

Member States shall ensure that:

1. EPR schemes

- Clearly define roles and responsibilities
- Establish measurable targets re waste management

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- Establish reporting systems (POMs, collection, treatment)
- Ensure equal treatment and non-discrimination

2. Waste holders

- Be informed about waste collection and litter prevention
- Be incentivized to participate in separate collection

3. Producer responsibility organisations (PROs)

- Have clearly defined coverage (geographical, products, materials)
- Have sufficient operational and financial means to meet obligations
- Put in place adequate self-control mechanisms and audits
- Ensure transparency

4. Financial contributions

- Be 'modulated' taking into account re-usability/recyclability
- Be based on optimised costs in case of involvement of public waste operators

Art 12(6) WEEE Directive, real end of life costs: it is considered that this is covered by the modulation of the costs by EPR. NZ adds that the challenge is how to make the link between all the stakeholders. EERA has chosen for the promotion of making standards mandatory. The standards are the key to get control on proper treatment (art 8 WEEE Directive). The situation now is that there are rumours in Belgium to abandon the obligation of standards. The situation in Germany is also difficult. Self-control is a start for financing, but the governments are not involved in the financing systems of PRO's. There is such a blind spot. On the other hand, many recyclers are bankrupted. The gap has to be closed by interference of the governments.

MF: modulated costs for recycling, this does implicate that you have to re-write the WEEE directive. When the product becomes waste (10 years after manufacturing) you cannot influence the costs of recycling anymore.

MB: the practices in all the countries are very different, the financial contributions are not always based on weight. NZ: is it possible to close this gap in the present frame work? We see a downward spiral. How can we turn this around? Ecosystèmes is a good example.

JH is responding on the presentation given that the modulated fee, and art. 15 WEEE Directive will not solve the main problems. The attempts in Close Weee and Prosum, proving what is happening with products was a nightmare. There are too many products (groups). Large databases are not the solution. Identify the issues and start to negotiate, based on tonnes. E.g. for smart phones, the battery separation could be an issue. It is not only the hazardous fraction, also the component and the way it is in the product. Making standards mandatory will result in the benefit that the Cenelec standards will cover all the Annex VII issues.

WEEE compliance promotion exercise:

- Seminars in MS to involve relevant stakeholders (6), also used for testing the EC proposals
- MS involved: Estonia, **Italy**, Romania, Bulgaria and Ireland and..?
- Final workshop in Brussels (Autumn, October, 2017)

Presentation Jaco Huisman UNU

JH gives a short update on the study:

- The surveys are based on deep diving and sharing really sensitive information about the finances of the treatment, in Germany, Spain and Sweden. Besides that there is a survey (phase 2) for all EERA members on the quality of the material that recyclers are collecting.

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- JH explains the cooperation in phase 1 in Spain, Germany and Sweden. New deadline for phase 2 survey for all EERA members is **14 of July**.

ACTION: UNU will communicate this to all EERA members.

NZ: We experience that there are parties that advocate that certification is not achievable for SME's., but it is most important for C&FA. The treatment operators of C&FA are always big enterprises. May be that should be differentiated by product category. The argument that costs are too high for SME's is too broad. The need of making standards mandatory for C&FA is the highest for this product group. There is no alternative for WLBX or Cenelec.

Other important topics to be shared with EERA members:

Strategy on plastics: CS the scope is far too broad: food plastics etc.. We are asking for:

1. A specific category for WEEE plastics.
2. Demand creation for post-consumer recycled plastics.
3. Realistic thresholds for recycled plastics.

Green deals- NSRR: CS explains the content of this project between Flanders, UK (not sure), France and Austria for fast track notifications. The deliverables are based on art 14 Waste Shipment Regulation.

The competent authorities do not use this tool. The idea is to make clear what are the rules for pre consent, how do you deal with it, how do you deal with notifications for pre-consented facilities within 7 days. This project is limited to EU. Eurometaux is supporting this.

HP 14 regulation: CS informs all EERA members that the HP 14 (Hazardous codes) amending regulation will come into force and this regulation is binding in all MS (decided June 2017, it shall apply in June 2018).

There is no clue how to materialize this. Does this mean that we have to analyse every truck that will enter the recycling plant. There will be published some guidance documents.. NZ: basic issue is that a lot of legislations that is meant for new products are becoming mandatory for waste streams.

We need to get across this to governments, and NGO's.

EERA position paper art 15 WEEE Directive, 2016:

<http://www.eera-recyclers.com/highlights/eera-position-paper-art-15-weee-directive-august-2016>

NZ expresses that EERA is grateful for the visit of today and that EERA members appreciated it very much to discuss with the EC regarding the main challenges for our near future.

Standards – Cenelec set up

NZ gives an update on the standards. Most standards are finished.



Current status 28 Jun 17 Bart in T Groen (convenor TC111xWG6) Use is at the user's sole risk. DNV GL, Wecycle, NVMP, or WEEE NL do not accept any liability or responsibility for loss or damages resulting from any such use. all time durations may be extended due to holidays etc.	TC111xWG: NWP [2 months]	TC111xWG & SubWG: Writing	TC111xWG: Writing & review round(s)	TC111xWG Dealing with WG comments upload comments discussed upon 2 weeks before WG meeting	NCs & TC111xWG: 1st Secretary inquiry [5 weeks]	CCMC 1st editorial review [1 - 2 months]	NCs & WG: 2nd Secretary inquiry [2 months]	CCMC 2nd editorial review [2 months]	NCs (translation (En, Ger, Fr)) [2 months]	NCs Enquiry (+ ext. 1st vote) (prEN) UAP (prEN + FprEN) Final Vote (FprEN) EN: 5 months; (on request 3 month voting result	Cenelec Date of Availability (when CEN CENELEC is finished) EN: 3 months TS: 3 months TR: 2 months	Start document updating EN: +5 yr TS: +3 yr
EN 50574-1 CF										Yes Vote		
TS 50574-2 CF										Yes Vote		
EN 50625-1 General treatment req										Yes Vote	Mar.14	Mar.19
EN 50625-2-1 Lamps										Yes Vote	Dec.14	Dec.19
EN 50625-2-2 CRT FPD										Yes Vote	May.15	May.20
EN 50625-2-3 Temp. Exchange										Yes Vote	Jul.17	Jul.22
EN 50625-2-4 PV										18-aug-17	Nov.17	Nov.22
TS 50625-3-1 General										Yes Vote	Jan.15	Jan.18
TS 50625-3-2 Lamps										Yes Vote	May.16	May.19
TS 50625-3-3 CRT FPD							not applicable		not applicable	Yes Vote	Aug.17	Aug.20
TS 50625-3-4 Temp. Exchange							not applicable		not applicable	Yes Vote	Jul.17	Jul.20
TS 50625-3-5 PV							not applicable		not applicable	18-aug-17	Nov.17	Nov.20
TS 50625-4 Col. & Log.							not applicable		not applicable	Yes Vote	Jun.17	Jun.20
TS 50625-5 Final processing							not applicable		not applicable	Yes Vote	Jul.17	Jul.20
TR 50625-6 Alignment report							not applicable		not applicable		Jun.18	
EN 50614 Re-use (WG7)							not applicable		not applicable	(latest sept '17)	Jun.18	

The meetings for updating of the documents will come. The general treatment standard is planned for a review to start in January 2018.

W XO information:

EERA is represented at the advisory committee, so in case members have concerns, please inform EERA secretariat. In the auditing contracts the confidentiality part is still an issue. It has to do with the access to the final report of the audit. Now, only the summaries are visible, so this is an improvement. When the TBS is paying for the audit and the recycler agrees on publishing the whole report, than there is approval to publish.

NZ shows the overview of certified treatment operators and 69 auditors. (48 independent auditors). These updated overviews are published at: <http://www.weeelabex.org/>

W XO will publish a plan for the transition to Cenelec.

Update from the countries:

Belgium: Today there was a short meeting with Belgium members. OVAM is proposing to create a level playing field in the three regions, based on ISO 17020. EERA will make a statement on this proposal, and will contact the board of Recupel and the ministry in Belgium.

Germany: so many things are happening. The German recyclers are not capable to be present everywhere. TA Luft is already huge. LAGA is the regulation at Bundesländer level.

In Germany there is proposed for some references with Cenelec in the new regulation. The limit values and target values will be taken from Cenelec. It will not become mandatory, because it is not possible. The government should integrate with consent of Bundesländer the quality of treatment. In 2018 there will also be 6 categories for WEEE in Germany, in line with EU legislation.

There are many legal cases. E.g. a container has to be picked up in 4 days, so there were started many legal cases against not collecting in time. On the other hand, the capacity is limited in Germany. What is the status of Behandlungsverontnung? UBA is 'the thinktank' and they are making proposals to the Governments. These are only recommendations, so the government will not give any assurances before 2020. There are several working groups, on PCB's, glass, plastics and depollution in general.

Switzerland: Volumes are declining (10% less). There are huge discussions with auditors on how to interpret the meaning of the removal of capacitors.

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The Netherlands: AW is asking for more news on the initiative of Mitsubishi to start a collection & sampling station for printed circuit boards in the Netherlands. Mitsubishi is certified for the EN 50625-5.3 end processing standard and have received all licenses.

AW is referring to the new LAP 3, which will be coming into force in 1,5 year. The use of CRT glass in concrete building blocks will probably be prohibited.

NZ informs that there are strong discussions regarding the enforcement and discussions and a legal case with the inspections on the interpretation of the word 'removal' (of fluorescent powders in CRT's) in the Netherlands.

Austria: The new treatment ordinance has coming into force.

Miscellaneous:

Invitation EURIC: MF is sharing that he has received an invitation for a working group on WEEE organised by EURIC, in July in Paris. Alba will not attend. Some other members have received this invitation.

Ecodesign: EERA will participate in Cenelec TC 10 -WG5: recyclability and will participate at the consultation meeting for displays, monitors and tv screens, on July 6. All members have received the invitation for this meeting by earlier e-mail.

Plant visit to Bianatt: Please register for the Bianatt plant visit and EERA meeting in Greece on September 27 & 28. Inform EERA a.s.a.p. with your flight schedules, so the travel schemes to the plant can be organised by Bianatt. Draft agenda is following soon.

Actionlist:

No	On-going actions	Who	Time	Status
207	Article for consumer organisations (Send out by EERA members in each country)	All	2015	Information from EERA members awaited
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 waste in the WEEE recycling industry	EERA secretariat	February 2017	Information to EERA members
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.

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Next meetings:

Meeting :	Date:	Location:
Plant visit Bianatt Greece & 77 th EERA meeting	27-09-2017 & 28-09-2017	Athene Greece
78th EERA meeting	30-11-2017	Düsseldorf