



## The “prepare for reuse” target and the role of Accredited Reuse Centres

*Preliminary note:*

*This document is based on feedback from MS, EP, industry, municipalities, and representatives from reuse organisations. It aims at improving the possible implementation of the preparation for reuse target, as suggested by the ENVI committee.*

### **Background:**

It is important to reinforce the dynamic for “preparation for reuse” activities and setting specific targets for preparation for reuse activities. Preparing for reuse is higher in the waste hierarchy of treatment than recycling and energy recovery, sitting just below prevention (see art 4 Waste Framework Directive). It offers a greater impact in terms of carbon dioxide reduction and savings than all other equipment treatment options.

The initial Commission proposal for the WEEE Recast included a combined recycling and preparing for re-use target formulated in Article 11 of the Commission’s proposal as follows:

*X% shall be recovered*

*Y% shall be prepared for re-use and recycled*

The ENVI committee suggests having a separate prepare for re-use target of 5%. The ENVI formulation is relevant to 6 product categories and is formulated as follows (Amendment 45):

*“...producers meet the following minimum targets...”*

*X% shall be recovered*

*Y% shall be recycled*

*5% shall be prepared for reuse*

### **Main arguments behind a 5% preparation for re-use target:**

- Resource Efficiency dimension: reusing electrical and electronic equipment, parts & components save substantial resources and energy when taking into account extraction and production stages
- Social dimension: preparation for reuse activities are locally based, often enable employment of people with no easy access to job or training and they help to make equipment more affordable for low income consumers,
- the economic/innovation dimension: targets for preparation for reuse could lead in the medium term to optimized design of equipment for the purposes of dismantability / repairability / upgradability thus preventing planned obsolescence
- it is consistent with the revised Waste Framework Directive that supports reuse and repair networks at the member state level
- it enhances the development of repair skills that are crucial for safeguarding resources and increasing employability
- A separate preparation for reuse target is needed to provide Member States with appropriate drivers to maximize the re-use of WEEE. This would generate the necessary drivers for

investment at the national level, and ensure that Member States provide effective support to the introduction and development of dedicated accredited re-use centres provided for by the Waste Framework Directive. Currently, due to a lack of a preparation for reuse target there has been no official monitoring of preparation for re-use so far. It is important that all waste streams are accounted for. A target would fill in this gap.

- The preparation for reuse target should apply across all WEEE categories, where preparation for reuse can be relevant.

### **The need for clarification:**

Concerns about the ENVI formulation were raised mainly by MS and Industry as they could lead to **difficulties in transposition:**

- The prepare for reuse targets apply to *producers* for the following categories: cooling and freezing appliances (cat 1), other large appliances (cat 4), screens and monitors (cat 2), small appliances (cat 5) and small ICT appliances (cat 6). **Producers are reluctant to take responsibility for such a target, if this does not apply also to other operators arranging WEEE treatment.**
- As preparation for reuse has been correctly defined in the WFD in Art. 3, which is quite ground-breaking, and not yet fully transposed and implemented, MS do not necessarily have a clear vision of what “preparation for reuse” means.

EC Definition: *“Preparing for re-use means checking, cleaning or repairing recovery operations, by which products or components of products that have become waste are prepared so that they can be re-used without any other pre-processing.”*

- As a consequence, preparation for reuse activities, although established in a few member states, are not yet fully supported and regulated at EU level as recycling and recovery activities, which could create loopholes in the waste value chain and create difficulties in the implementation and enforcement process.
- Having a preparation for reuse target without specifying who is responsible for it could **lead to an “unfair” situation, where self declared “reuse organizations” could cherry pick the most valuable appliances**, and then make the best business out of it, at the expense of producer schemes remaining with less valuable items (particularly if reuse actors have prior access to the WEEE streams at collection points as suggested in *amdt 32 art 6.2 of ENVI* ). It is thus imperative that the reuse value of products has priority over the value of recyclable materials.
- There is **no requirement on making refurbished products or reusable parts available on the second hand market and to prevent direct sales to recyclers** from operators acting in preparation for reuse activities.
- There are no clear conditions on how exportation for reuse would be taken into account and regulated to ensure compliance. If rules/clear requirements are not established at EU level, there will be no possibility to ever assess the *“equivalent conditions”* for preparation for reuse activities in facilities abroad. (Note: *“equivalent conditions”* is a key provision of Waste Shipment Regulation to ensure waste treatment abroad is aligned with EU requirements)

## **Possible Solutions:**

### **1- Ensure monitoring of preparation for reuse activities by accredited reuse organisations**

It is important to better monitor these “preparation for reuse” activities: **only registered and certified (approved/authorized/accredited) “reuse centres” (as members of the Accredited Reuse and Repair Networks proposed by the revised WFD) should be able to monitor preparation for reuse activities.**

Such accredited reuse centres would have strict control over every appliance that enters, and inform of their facts, figures and management. Preparing WEEE for reuse must stringently adhere to the principals of the definition of waste, so that a waste WEEE product does not cease to be waste unless it has been fully tested and can be guaranteed to be fit for purpose and that proof of this is traceable and reported for every single product.

This certification or accreditation should at least include:

- the possible *transfer of responsibility* from waste producers to certified reuse centres for the refurbished appliances and reusable parts,
- minimum *safety requirements* for workers, vicinity and environment,
- minimum standards of electrical safety testing and functionality testing to ensure equipment is fit and safe for purpose,
- the *proper handling of appliances/parts* (collection, dismantling, control,...)
- the *commitment to make available refurbished appliances and reusable parts* (being sales or donations), providing *they respect minimum energy efficiency standards and chemical restrictions* (RoHS requirements).
- the engagement to *handover the waste of activities to proper collection/treatment points* (preventing direct sales to recyclers at the expenses of take back schemes).
- to produce monthly and annual reports showing coherence between the (weight of) collected WEEE and the (weight of) appliances/parts made available + waste of activities given back to collection points
- the evidence that the products are not going for illegal export
- full audit trail of all WEEE coming into reuse centres and all EEE going out, as well as all WEEE that is no longer fit for preparation for reuse and thus sent for recycling and other treatment

Some standards have been developed within reuse organisation networks such as: PAS141(UK), Revisie (Flanders), ElcetroREV (Brussels and Wallonia) which could be helpful to better define this certification scheme. The extension of the WEEE labex initiative could also be considered, as WEEE labex is in process of setting standards for WEEE management. Such an extension of the WEEE labex or similar standard would require the participation of reuse organizations representatives.

### **2- Articulate preparation for reuse activities with existing schemes for extended producer responsibility in MS**

It is important to link preparation for reuse activities with producer financial responsibility, particularly if this extended producer responsibility integrates part of the collection system and infrastructure (producers may be reluctant to pay for the portion of the waste that will escape them).

As a consequence, **MS should be given the possibility to complement these certification requirements by asking accredited reuse centres to have an agreement with compliant take back schemes in order to increase transparency.**

### **3- Apply this target to all operators, not only to producers or third party acting on their behalf**

This 5% preparation for reuse target is a legal requirement, which means any operator entering the WEEE market should ensure that the WEEE amount they have taken charge of will be treated in compliance with this target (and the recycling and recovery targets as well). All producers, compliance schemes and WEEE operators must determine and publish operational plans that illustrate how they will support the 5% preparation for reuse target as part of the MS registration to manage WEEE compliance.

It is up to MS to decide if they wish to restrict the number of operators that are allowed to deal with WEEE, particularly those that are not accredited/approved/authorized. In case such a restriction is not applied, private actors acting purely for commercial reasons should comply with the legal targets.

### **4- Allow the possibility of a transition period before reaching the preparation for reuse target**

In view of the different levels of maturity between MS regarding preparation for reuse activities and their monitoring, a transition period should be granted according to the individual MS situation.

The Directive could stipulate the possibility of such a transition period allowance (till 2014), justified on sound rationale provided by the MS.

## **Suggestion for amending the ENVI formulation**

### **Art 11:**

Replace initial ENVI formulation by:

*X% shall be recovered*

*Y% shall be recycled*

***5% shall be prepared for reuse through accredited reuse centres***

**An annex setting the minimum requirements for certification and registration** including at least the above mentioned points could be added to the core text of the Directive. This would ensure a better monitoring process for preparation for reuse activities (see below an indicative list of possible requirements).

## **Annex on minimum requirements for certification scheme of accredited reuse centres registered for preparation for reuse activities**

This is a first non exhaustive list of possible requirements for accreditation of reuse centres:

- **permit based on respecting standards of safety, functionality, environment, work conditions, consumer protection, product liability and enabling a transfer of responsibility from waste producer to reuse centre,**
- **fulfill minimum rate of refurbished appliances - compliant with energy efficiency standards and chemical restrictions - and reusable parts compared with amount of WEEE taken from collection points and waste brought back to collection points.**

- **report on**
  - **amount of WEEE taken from collection points**
  - **amount of refurbished whole appliances/reusable parts made out of the WEEE taken from collection points**
  - **amount of waste from\_refurbishment activities (or non-used WEEE) handed back to collection points or treatment facilities**
- **Having a strong selection procedure of WEEE at collection points is crucial in order to ensure the maximum amount of appliances and components that can be prepared for reuse by the accredited reuse centre. It is thus also crucial that the conditions in which WEEE is disposed of and stored at collection points is optimized for the preparation for reuse of appliances and that accredited reuse centres have prior access to all collection points**

*Note 1:*

*It is crucial to ensure that the main activity of the accredited reuse centres is refurbishment of appliances/dismantling and repairing of reusable parts and not treating and selling of waste. As a consequence, it is important to ensure a proper handover of the waste of preparation for reuse activities to avoid sub-standard treatment of this e-waste part.*

Accredited centres will have to provide evidence of preparation for reuse activities in order to ensure the 5% target is being met.

*Note 2:*

*A closer investigation on how to link this accreditation scheme with WEEE labex (or other WEEE management standards) could be relevant, providing Reuse organizations are involved in the process from the beginning*

Contacts:

Michal Len – RREUSE  
Email : [michal.len@reuse.org](mailto:michal.len@reuse.org)  
Tel : 0032 2 894 46 12

Stephane Arditi – EEB  
Email: [stephane.arditi@eeb.org](mailto:stephane.arditi@eeb.org)  
Tel: 0032 2 289 10 97