

Position on CENELEC standards for the collection, logistics and preparation for re-use of WEEE

1. Introduction

A professional approach to the preparation for reuse¹ of WEEE² is essential both in terms of consumer safety and confidence when purchasing second-hand goods. It is also important because of health, safety and environmental issues, particularly considering the potential presence of substances of concern. Hundreds of social enterprises across Europe are active in this sector, giving a new lease of life to products and providing local job and training opportunities, including for people at risk of socio-economic exclusion. A number of these social enterprises within the RREUSE network have also developed recognised quality protocols and standards for the sector at regional and national level³.

To enhance the quality and the quantity of discarded yet re-useable goods going through a preparing for re-use process, it is also essential that waste electronics are collected and transported in a way which preserves their integrity. Allowing and facilitating preparing for re-use operators to have access to this material is then crucial in preventing re-usable goods from being prematurely recycled.

The [EU WEEE directive](#), published in 2012, aims to ensure that WEEE is collected and transported appropriately and that the WEEE management sector improves its quality in terms of respect towards the environment and human health. Article 8(5) of the directive mandated the development of standards for the treatment of WEEE, including recovery, recycling and preparing for re-use, of waste electronics by the European standardisation organisation CENELEC. This has resulted in the creation of a suite of standards including 'specifications for the collection and logistics associated with WEEE' (TS 50625-4), as well as 'requirements for the preparing for re-use of WEEE' (EN 50614).

The directive also opens up the possibility for the European Commission to develop future laws via implementing acts, laying down minimum quality standards for the management of WEEE at EU level, based in particular on these standards. The Commission is currently investigating this possibility.

In this paper RREUSE, supported by ECOS, outline that if minimum requirements for preparing for re-use activities are to be developed at EU level, they must be accompanied with more stringent rules on the collection and logistics of WEEE. This paper also argues that standards created by CENELEC, especially EN 50614 on preparing for re-use, should remain voluntary. Reasons include current limited

¹[Directive 2008/98/EC of 19 November 2008 on waste](#): '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. More info on preparing for re-use operators can be found in Annex 1.

² Waste Electric and Electronic Equipment

³ Quality protocols include Revise and ElectroRev in Belgium

regulatory and financial support for preparation for re-use as well as technical details within standards themselves.

2. A challenging context for preparing for re-use operators

2.1. A lack of EU policies supporting preparing for re-use

By not providing clear and separate preparing for re-use targets, the WEEE directive missed an opportunity to support the sector and, by omission, encourages the premature recycling of re-usable products. Currently, only three countries and regions in the EU have re-use or preparing for re-use targets⁴. In this context, there are no incentives for those managing WEEE flows, such as municipalities and Producer Responsibility Organisations (PROs), to enter into agreements and partnerships with preparation for re-use operators.

2.2. High costs related to reporting and auditing

Implementing the proximity principle in practice, preparing for re-use operators collect, refurbish and resell second-hand goods in the same city or region. As a result, they often operate on a small scale. Nevertheless, they respect the same rules as larger actors to protect the health and safety of their employees, and to ensure their second-hand products are safe. However, it may be complicated for certain operators to provide data currently requested by standards EN 50614. The share of reporting costs is higher for small and medium enterprises (SMEs) because they are applied to smaller quantities of products and still requiring similar investments for reporting tools.

Additionally, a number of preparing for re-use operators also conduct other activities such as dismantling, recycling and transportation of WEEE. These activities may also be covered by other standards related to WEEE, ramping up auditing costs for an individual organisation who may be forced to implement a number of different standards.

3. RREUSE comments on CENELEC standards TS 50628-4 and EN 50614

While standards can provide guidance on how to respect a given legislation, they are not the only way for operators to demonstrate compliance. The standards directly impacting preparing for re-use activities (TS 50625-4 and EN 50614) contain gaps and/or problematic criteria and therefore should remain voluntary. The following sections provide a commentary on both the collection and logistics standard as well as that for preparation for re-use.


3.1. Collection and logistics standards (TS 50625-4):

Article 6(2) of the WEEE directive requires waste collection points to be set up in a way which preserves the re-usability of collected e-waste while giving access to preparing for re-use facilities. This requirement is addressed, in part, within 'specifications for the collection and logistics associated with WEEE' (TS 50625-4). Smooth collection and transportation of e-waste that preserves re-use




⁴ European Environmental Agency (2018), Waste prevention in Europe — policies, status and trends in reuse in 2017 (Available [here](#))

potential is necessary to reach higher reusability rates. However, the CENELEC collection and logistics standard is not strong enough to ensure this happens.

In general, the wording within the standard provides too much room for interpretation when it comes to storage of equipment intended for preparation for re-use such as large household appliances without weatherproof facilities.



Waste electrical goods need to be handled with care, or they can't be re-used

In February 2017, ECOS and RREUSE advocated for more ambitious requirements through the #WEEELove campaign. More information can be found on [our website](#).

Moreover, it is only required from collection and logistics operators to apply the rules concerning safeguarding the re-usability of WEEE “if an agreement is in place with preparing for re-use operators”. Given that they are simply “encouraged to develop” these agreements, there is no guarantee that preparing for re-use operators have access to the material. RREUSE would like to ensure that any preparing for re-use operator respecting its national legislation on waste is granted access to WEEE collection points. Collection and logistics operators should not be able to

refuse this access. It is recognised that laws concerning WEEE must be implemented more strongly to make this happen.

The standard also specifies that if collection and logistics operators partner with preparing for re-use operators, they should do so with those respecting the preparing for re-use standards EN 50614. Given that EU standards created by CENELEC are voluntary in nature, such requirements should have been removed.

Finally, TS 50625-4 forbids ‘uncontrolled’ tipping of WEEE, implying that controlled tipping of WEEE is acceptable. This practice is detrimental to the re-usability of electronic products. Any form of tipping should be forbidden.

3.2. Preparing for re-use standard (EN 50614):

EN 50614 sets out to create a set of rules of preparing for re-use operators to abide by if working toward the standard. Whilst acknowledging that this is a first attempt at a European standard at EU level including a number of interesting guidelines for the sector, several aspects of these standards are deemed overly demanding and unrealistic to implement with practice for the preparation for re-use operator.

Firstly, the preparing for re-use standards often refers to the requirement for the preparation for re-use operator restricting partnership with other operators of the waste management chain that respect the same series of CENELEC standards. Products failing a re-usability test, for example, would have to be transferred exclusively to recyclers respecting treatment standards also developed by CENELEC. The same rule applies if an external transporter is needed to transfer discarded products from the

WEEE collection point to the preparing for re-use facility. Partners selected by preparing for re-use operators often rely on long-term relationships and depend on their availability in the regions where they operate. Restrictions on who a preparation for re-use operator should work with contained within a standard and not legislation is inappropriate. It should only be required from them to demonstrate working with operators respecting waste legislation.

Secondly, there exist certain requirements in the standard whose implementation depends fully on the cooperation of manufacturers, especially concerning information provision about their products. For example, this includes the provision of detailed product recall information to the preparation for re-use operators which are in certain cases non-existent, incomplete or impossible to access. Manufacturers should be obliged to provide this information in an easily accessible standardised format free of charge. Whilst not directly implied in the standard itself, this should also apply to the provision of manufacturer repair and service information to the preparation for re-use operator in order to make repair and servicing more efficient, in line with Article 15 of the WEEE Directive.

4. Representation of preparing for re-use operators in the standardisation process

Whilst a wide range of stakeholders participated in the creation of the aforementioned standards, representation in the working groups of the various sectors were not balanced, especially concerning preparation for re-use operators. Stakeholders included product manufacturers, recyclers, WEEE Producer Responsibility Organisations (PROs), auditors, preparing for re-use operators (including RREUSE) and civil society (including [ECOS](#)).

However, given financial⁵ and time constraints associated with their activities and scale, many preparing for re-use operators for whom these standards have been developed were significantly under-represented in the writing of the standards in comparison to other stakeholders. Given the potential impact of TS 50625-4 and EN 50614 on their activities, they should have played a more prominent role in the negotiations and have been supported appropriately in order to be able to participate in the process. This could have been done, for example, by free of charge participation at national level. Many organisations wanting to take part in the process did not do so because of fees associated with being part of the standardisation process.

As such, RREUSE advises the Commission, as well as Member States, to make sure that any future minimum requirements for preparation for re-use and collection/logistics operators are developed by a representative and fully balanced set of stakeholders, with participation of the Commission itself in the working groups.

5. Conclusions and recommendations

It is not RREUSE intention to state that no requirements should be applied to the WEEE preparing for re-use sector. In fact, it would be rather reassuring for RREUSE members to have clearly established rules for their activities, establishing trust with their partners and customers. In this regard, RREUSE

⁵ A substantial fee has to be paid to take part in the standardisation process

already developed guidelines describing what rules “approved re-use centres” should abide by (more info [here](#)). It contains a non-exhaustive list of requirements such as:

- Full safety requirements for workers, vicinity and environment
- Records of all material streams entering the re-use centre and all materials going out
- For every product group prepared for re-use by the re-use centre a qualified or competent person and/or training regime must be in place
- Proper handling of used goods in a controlled manner (collection, dismantling, testing...)
- Commitment to make available safe used goods and reusable parts as applicable (being sales or donations) in line with any relevant national rules on warranty
- Compliance with national commerce and waste regulations if applicable
- Etc.

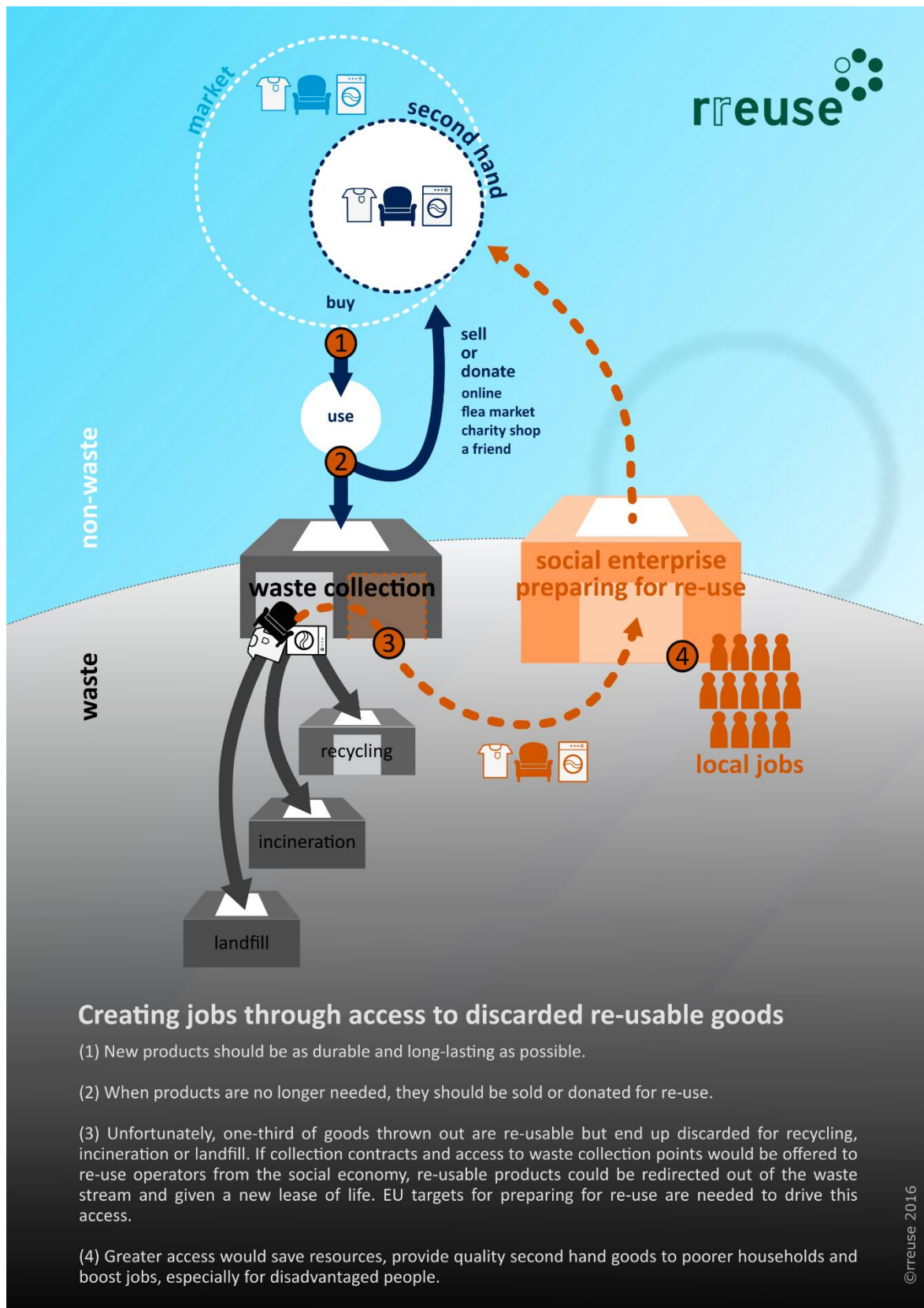
Minimum requirements for all would also demonstrate professionalism and remove a sword of Damocles from operators worried that local authorities, PROs or governments make CENELEC standards mandatory for them with no compensation for auditing costs. Implementation of standards without appropriate support measures in terms of financing has already had severe impact on a number of re-use operators in the Netherlands for example (see Annex II).

However, RREUSE is of the opinion that the standardisation process was not the right tool to develop these minimum requirements. For this reason, RREUSE reiterates that standards should remain voluntary and not be transposed directly into European or national legislation.

Should the Commission be considering minimum requirements for WEEE preparing for re-use activities, RREUSE suggests that financial and policy tools also be developed to help operators of this sector meet these rules more easily:

- An impact assessment and cost benefit analysis should be done prior to establishing minimum requirements on the whole value chain.
- The costs of demonstrating compliance with WEEE preparing for re-use minimum requirements should not be at the expense of the operator. It is suggested that this be carried out by national inspection agencies.
- WEEE preparing for re-use targets should be set in order to reinforce the partnerships with other actors of the WEEE managerial chain (in particular local authorities and PROs). Collection and logistics operators should not only be “encouraged to have partnerships with reuse actors” but automatically give access to any preparing for re-use operator requesting it.
- Separation of potentially re-usable products from the waste stream should be done at the earlier stage possible.
- WEEE collection points, storage facilities and transportation should be designed in a way which truly preserves the re-usability of the collected products.
- PROs should finance preparing for re-use and prevention activities with a fixed and clear amount.
- Article 15 of the WEEE directive on free access to repair information for treatment facilities should be properly enforced in order to facilitate a more efficient preparation for re-use process.

Annex 1: The preparing for re-use chain



Annex 2: Implementing WEEE standards with unintended consequences on re-use operators: The case of WEEELABEX in the Netherlands

Since 1 July 2015, all WEEE transporters and treatment operators in the Netherlands must be WEEELABEX certified according to Dutch law. WEEELABEX is a set of voluntary standards developed and implemented by a number of WEEE producer schemes. In the Netherlands, any companies which disassemble parts from electrical appliances must be WEEELABEX certified.

In 2016, a number of social enterprise re-use operators received visits from the Human Environment and Transport Inspectorate of the Netherlands. The re-use operators in question were asked to stop their re-use and repair operations because they were viewed as operating in violation of Dutch WEEE law. In particular, dismantling donated devices for parts to repair another device was seen as a recovery operation requiring the operator in question to be WEEELABEX certified.

As a result, these social enterprise re-use operators were required to immediately cease operations and cut jobs associated with the activity. The social enterprise network, bKN, a member of RREUSE, brought this issue to the attention of the Dutch Secretary of State. The bKN highlighted that the re-use and repair activities carried out by social enterprises is at the heart of circular economy strategies in the Netherlands and that these activities are low risk and small scale. The bKN also highlighted that forcing certification against WEEELABEX is economically impossible.

In particular, revenues from sales of repaired devices does not outweigh costs of certification and necessary investments in the adjustments of the operations management. The alternative is to order spare parts from manufacturers which is time-consuming and overly costly. The Secretary of State responded positively with the introduction of an exception in WEEE laws allowing for the dismantling of devices for spare parts with a view of re-using them.

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RREUSE is an independent non-profit organisation representing social enterprises active in the field of re-use, repair and recycling, with 26 members across 24 countries in Europe and the USA.

Our main vision is for Europe to support the role of social enterprise in a circular economy, providing meaningful work opportunities to thousands of vulnerable members of our community through innovative economic, social and environmentally beneficial activities.

RREUSE's primary mission is to help tackle poverty, social exclusion and a throwaway culture by promoting policies, best practices and partnerships that support the professionalism and development of social enterprises working in environmental services with high potential for local and inclusive job creation, notably re-use and repair.

ECOS is the only environmental organisation worldwide specialised in standardisation. We are an international network of members sharing a vision of a clean and healthy environment where people live in respect of the planet and its natural resources, preserving them for future generations.

ECOS promotes and defends environmental interests in the development of standards at European and international level, as well as in the development of technical environmental product policies. Thanks to nearly 20 years of experience and a strong network of members and experts, our role in these processes is highly valued and widely recognised.

ECOS is officially recognised in the EU as one of the four organisations whose work is supported to ensure standards serve society and that the European Standardisation System is legitimate. We closely cooperate with the European standardisation organisations (CEN, CENELEC, and ETSI), as well as their international counterparts (ISO and IEC).