

## **RREUSE position on the role of Extended Producer Responsibility in promoting product reuse and preparation for reuse activities**

Extended Producer Responsibility is being promoted as a key market based instrument to help implement EU waste legislation, including full application of the waste hierarchy. However, the role of EPR in promoting reuse (a form of waste prevention) and preparation for reuse has been seldom analysed and must be addressed. Reuse and preparation for reuse activities directly increase the useful lifespan of a product, saving on embodied materials, chemicals and energy required to produce a new product leading to greater resource efficiency and job creation<sup>1</sup>

It is becoming increasingly evident that once EPR schemes have been put in place for waste streams such as WEEE, access to the waste stream for reuse centres in order to separate potentially reusable items is increasingly restricted, leading to more direct recycling, landfilling or incineration of perfectly reusable products<sup>2</sup>.

With Member States such as France introducing EPR schemes for furniture and textiles, both of which contain products of high reuse potential, RREUSE welcomes the current work being carried out by the Commission in the development of guidelines/golden rules for the management and implementation of Extended Producer Responsibility Schemes in Europe.

Building on a recent background paper by RREUSE outlining how certain EPR schemes in Europe are cooperating with reuse actors in WEEE, furniture and textile waste streams<sup>3</sup>, RREUSE believes that that EPR schemes must adhere to the following:

1. EPR schemes must be financially responsible for the full lifecycle of a product and as such respect and support the European waste hierarchy, prioritising waste prevention and preparation for reuse activities.
2. EPR schemes that manage waste collection points directly/indirectly must grant access to the waste stream for accredited/approved reuse centres in order to sort potentially reusable items.
3. EPR schemes must be obliged to safeguard and guarantee the potential reuse of products in their entire logistic chain. This includes collection, correct handling, transport and storage which should be organised in a careful manner in order to prevent possible damage. The

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<sup>1</sup> The collection and preparation for reuse of 1000 tonnes of WEEE can create at least 5 times more jobs in collection and recycling of an equivalent amount

<sup>2</sup> e.g. RX3. 2013. *All Island Bulky Waste Reuse Best Practice Management Feasibility Study* [Online]. Available: [http://www.rx3.ie/MDGUploadedFiles/file/rx3publications/Bulky\\_Waste\\_Reuse\\_Study\\_website.pdf](http://www.rx3.ie/MDGUploadedFiles/file/rx3publications/Bulky_Waste_Reuse_Study_website.pdf).

<sup>3</sup> RREUSE, 2013, Extended Producer Responsibility and the role of reuse activities: Opportunities for a resource efficient, socially inclusive waste management system. Available online [here](#)

experience, know-how and partnership with approved/accredited reuse centres can help EPR schemes in managing this.

4. EPR schemes must include within their calls for tender for collection and treatment, mandatory provisions to support reuse activities. Existing practices today include mandatory checking of collected waste for items with reuse potential by all actors involved in collection chain<sup>4</sup>.
5. In order to help safeguard and promote the social value of the reuse sector, carried out by social enterprises<sup>5</sup>, social clauses must be integrated within the calls for tender. In order to distinguish such social enterprises, the current proposed Directive on Public Procurement allows for Member States to reserve contracts to organisations that employ over 30% disadvantaged or disabled workers. Cooperation between EPR schemes and social enterprises does exist in Europe but this is far from the norm. The new French EPR schemes for furniture have chosen to work with networks of social enterprises to help realise their reuse objectives<sup>6</sup>.
6. Actors involved in the collection of products, including retailers, should be rewarded financially for the materials and products which they separate for preparation for reuse in order to incentivise and enforce this activity
7. EPR schemes must report to relevant government body or clearing house the way in which their annual operational plans intend to support waste prevention and preparation for reuse activities similar to practices in the UK<sup>7</sup>. These must include measurable and quantified objectives for waste prevention and preparation for reuse. In addition they must report evidence as proof that they are doing so against quantifiable objectives. Such strategies could include granting access for accredited/approved reuse centres to collection points to help separate potentially reusable materials.
8. Reuse centres are locally embedded and have a good relationship with their surroundings. EPR schemes must therefore fund awareness raising and communication campaigns to improve source separation and separate collection of different waste streams such as WEEE and also about the importance of influencing consumer decisions and consumption patterns
9. It is becoming increasingly difficult to repair products, with electronics and furniture being two cases in point. One of the reasons is due to the withholding of information by the

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<sup>4</sup> See footnote 3.

<sup>5</sup> Social enterprises active in waste management, use the economic activity of collection, sorting, reuse, preparation for reuse and recycling in order to realise their social aims, namely the employment and socio-economic inclusion of disadvantaged workers in the labour market

<sup>6</sup> In France, a separate reuse activity development target has been set in the form of increasing the amount of furniture put back on the market by 50% relative to a baseline situation by networks of social enterprises by 2017. It relates to the French Decree on Furniture Waste: [Décret n° 2012-22 du 6 janvier 2012 relatif à la gestion des déchets d'éléments d'ameublement](#)

<sup>7</sup> See footnote 3

producers concerning service manuals, appropriate fault diagnosis software and hardware. EPR schemes must provide free of charge access to this information to reuse and repair centres, not only to those of the after-sales service providers of the manufacturers. It is also very important to guarantee access to spare parts at a reasonable price for a minimum of 10 years and also to design products in a way that does not inhibit their repair.

### **Conclusions:**

In order for Europe to move toward better resource efficiency and social inclusion all economic instruments related to waste management must ensure implementation of the waste hierarchy with Extended Producer Responsibility being no exception. Granting access to the waste stream for accredited/approved reuse organisation, having financial incentives for promoting reuse and preparation for reuse together with support for cooperation with actors from the social economy, will help move Europe towards achieving its 2020 goals.

### **Who we are:**

**The Reuse and Recycling EU Social Enterprises network (RREUSE)** is a European umbrella organisation for national and regional networks of social enterprises with re-use, repair and recycling activities. Approximately 42,000 Full Time Equivalent (FTE) employees and over 200,000 volunteers and trainees work throughout our 25 member organisations across 15 EU Member States. Although structures and national contexts are diverse, RREUSE members share common elements such as the protection of the environment, the fight against poverty and, especially, the progress of disadvantaged people back into the labour market. RREUSE's main goal is to put sustainable development into practice by encouraging job creation and social inclusion in the field of waste prevention and sustainable waste management activities

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