



Frequently Asked Questions

WEEELABEX

Standards that take sustainable WEEE management business to the next level

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Introduction

Who is the WEEE Forum?

The WEEE Forum (www.weee-forum.org) is a European non-profit association speaking for 38 electrical and electronic equipment waste (WEEE) collection and recovery organisations – alternatively referred to as ‘producer responsibility organisations’ (PRO) and ‘WEEE systems’ – all of them run on behalf of producers. It was set up in the early 2000s. The 38 PROs are based in Austria, Belgium, Czech Republic, Denmark, Italy, Germany, Greece, France, Hungary, Ireland, Lithuania, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland and the United Kingdom. It is the biggest organisation of its kind in the world. In 2010, its member organisations reported collection and proper de-pollution and recycling of more than 2 million tonnes of WEEE.

The WEEE Forum’s mission is to provide WEEE systems a platform for co-operation as well as a set of standards and benchmarking tools, which in turn assists them in the optimisation of their operations and in a continuous search for excellence and improvement in environmental performance. ‘WEEELABEX’ is the WEEE Forum’s most important standardisation project, both in terms of financial resources and scope.

Based on the growing body of know-how, the WEEE Forum also seeks to be a centre of competence that allows member organisations to make constructive contributions to the general debate on electrical and electronic waste policy matters. The association assists its members in the development of their activities in a sustainable manner within the existing regulatory and legislative framework.

Who are the members of the WEEE Forum?

Members in 2011: Amb3E, Appliances Recycling, Asekol, Eco-asimelec, Ecodom, Ecofimática, Ecolec, Ecologic, Ecoped, Eco-RAEE's, ecoR'it, Eco-systèmes, Ecotic, Eco Tic, EEPa, ElectroCoord, ElektroEko, Elektrowin, El-Kretsen, elretur, el retur, Envidom, ICT Milieu, Lightcycle, Lumicom, Recupel, ReMedia, Repic, Retela, RoRec, SENS, SEWA, SLRS, SWICO, UFH, Wecycle, WEEE Ireland and Zeos.

The WEEELABEX project

1. What does 'WEEELABEX' stand for?

WEEELABEX is the acronym ('WEEE LABEL of EXcellence') of a project, run by the WEEE Forum in co-operation with stakeholders from the producers' community and processing industry. Producers and recyclers associations are represented in both working groups and the project's steering group (CECED, ELC and DIGITALEUROPE, and EERA). The project (2009-2012) is co-financed by the European Community under the LIFE programme (LIFE07 ENV/B/000041). It aims to design, on the one hand, a set of European standards with respect to the collection, sorting, storage, transportation, preparation for re-use, treatment, processing and disposal of all kinds of WEEE, and, on the other hand, a harmonised set of rules and procedures that will provide for conformity verification.

2. What is the context for the WEEELABEX project?

The WEEELABEX project was born against a specific legal, environmental and commercial background.

- Some collection, logistics and recycling sites fail to properly store or handle WEEE, resulting in **uncontrolled emissions**.
- Today, in Europe, a **patchwork of both legal and contractual requirements**, of different ambition and enforced with different levels of determination, hinders processing companies' economies of scale and creates an uneven playing field.
- In some parts of Europe, WEEE treatment technologies are cutting-edge and workers' safety is properly ensured, while in others de-pollution and mechanical treatment is performed in workshops with **inadequate safety measures** or inappropriate shredder technologies.
- New types of electrical and electronic equipment are marketed that require **specific de-pollution techniques or practices**.
- In some parts of Europe, **downstream operations** are carefully monitored and documented, while in others consumers and electronics producers paying for the management of WEEE have no such assurance.

3. What does the WEEELABEX project aspire to accomplish?

The WEEELABEX project aspires to address the problems mentioned under Q2. More particularly, the project is resulting, across Europe, in:

- Less **pollution**.
- More **sustainable** activities, in particular higher levels of recovery of secondary raw materials (resource efficiency).
- Better **occupational conditions** for workers.
- Assurance of a more transparent **material flow management** and adequate de-pollution processes through proper documentation and reporting.
- Reduced scope for **illegal shipments** of WEEE.
- European standards and guidance documents that will more **flexibly** address new (technological) developments.

It will create incentives for operators to meet a set of uniform standards, and disincentives for dishonest companies to dodge ‘the system’, and hence, a level the playing field for WEEE management companies.

4. What is the overall scope of the WEEELABEX project?

The project aspires to design, on the one hand, a set of European standards (or ‘normative requirements’) with respect to the collection, sorting, storage, transportation, preparation for re-use, treatment, processing and disposal of all kinds of WEEE, and, on the other hand, a harmonised set of rules and procedures that will provide for conformity verification.

Operators that fall within the scope of the project are: collection sites, logistics sites, transporters, and facilities involved in dismantling, de-pollution, preparation for re-use, disposal and recycling.

- The standards concern **all steps in the chain**, from collection to disposal.
- Operators involved in WEEE operations will be audited by **WEEELABEX auditors**, trained in accordance with the standards.
- Facilities and sites that meet the requirements will be identifiable. No label or visual identifier will be awarded to companies or legal entities as such.
- Operators will have to be in a position to **assess conformity** of their activities with the standards and to demonstrate that they have contracted with WEEELABEX (or WEEELABEX-equivalent) partners.

- The project can be considered of an **open nature** in the sense that any organisation that accepts the obligations of WEEELABEX can join the scheme.
- The standards are expected to be, at least, **acknowledged** by the administrative bodies in Europe in charge of implementation and enforcement of the provisions in the Directive transposed in national (and sub-national) regulation. The EU member states are called on to integrate them into their policy.
- It is not the project's ambition to produce labels for products.

5. What deliverables will be produced?

Apart from a set of standards and guidance documents on collection, logistics and treatment (including technical requirements and documentation and reporting obligations), the project will produce:

- Uniform **conformity verification procedures**.
- Audit **reporting tools**, such as manuals and audit forms.
- A pool of **WEEELABEX auditors**, familiar with WEEE processing technologies, trained to perform audits in accordance with the standard.
- A **visual identifier** (or mark or quality label) to identify sites that are in conformity with the standards.

6. What makes the WEEELABEX project novel?

Both the WEEELABEX standards and the WEEELABEX project as a whole are original and innovative for a number of reasons.

- For the first time ever, a harmonised, **continental set of (technical) normative requirements** (standards) and guidance documents affecting all parties involved in WEEE operations, from collection to disposal, and covering all 10 WEEE categories is laid down, respecting legislative requirements of Directive 2002/96/EC on WEEE and its transposing national laws and decrees.
- The WEEE systems of the WEEE Forum, representing approximately two-thirds of officially reported WEEE collection in Europe, will contractually require the collection sites, logistics facilities and recycling plants to implement the standards. In other words, WEEELABEX will have an **immediate and grand-scale impact** on the entire WEEE chain, from collection to disposal.

- The set of standards is not only likely to be acknowledged by authorities as a **new 'benchmark'** but will probably resonate globally as well. Operators in other parts of the world will likely wish to adhere to an equivalent level of principles.
- The project starts off to produce requirements to be integrated into contracts of WEEE systems with operators. Yet (part of) those requirements will likely end up becoming formal **EN standards**, affecting all operators on the market, not just those with whom the PROs of the WEEE Forum have entered contractual terms. But even in the short term, the WEEELABEX standards are likely to be adopted by parties with whom PROs of the WEEE Forum have no contracts.
- At the time of writing, Directive 2002/96/EC is being recast. The future recast Directive might specify that operators meeting the provisions of a standard, the development of which by European standardisation organisations is mandated by the European Commission, will be presumed to comply with the Directive. Those so-called '**harmonised standards**' are expected to arise from the WEEELABEX set of standards.
- The novelty and ambition concern the fact that WEEELABEX expects parties to be in a position to monitor **downstream operations**; it lays down uniform, specific, verifiable and comprehensive reporting and documentation obligations, most of which are not, as such, legally required. The reporting will follow the principles and reporting format provided by WF_RepTool, the WEEE Forum's web-based tool that allows operators to communicate recycling and recovery quotas to WEEE systems on the basis of a harmonised reporting classification (WF_RepLists).
- Also for the first time ever, a **European scheme** is being constructed that harmonises the rules for the verification of conformity with the normative requirements. The scheme is of a private and sui generis nature – it will affect the WEEE Forum and other contracting parties – yet is expected to demonstrate how European rules can be enforced in a harmonised manner.
- Monitoring of conformity with the standards will refer to specific **concentration and target limits**, not to a generic, unspecified ambition of 'continuous systemic improvement'. Those limits are currently under development (2011).

The WEEELABEX standards

7. What is the scope of the WEEELABEX standards?

For the first time, a coherent, continental and comprehensive set of technical requirements with respect to WEEE operations is laid down. They are referred to as 'WEEELABEX standards' or normative documents.

- The standards are normative (as opposed to descriptive) requirements and concern **all steps in the chain**, including collection and preparation for re-use.
- The standards cover all **10 WEEE categories**.
- The requirements related to collection, logistics and treatment activities are supposed to be **implemented by all the WEEE systems** of the WEEE Forum and those who have contracted to do so. They are designed to encourage the WEEE systems' partners to play their important role in the WEEE stream.
- The requirements laid down in the standard are embedded in **legislative requirements** of Directive 2002/96/EC and its transposing legislation.

In August 2009, the WEEE Forum signed a contract of co-operation with CENELEC, one of the three official EU standards bodies. In time, (some of) the requirements of the WEEELABEX normative documents will likely be translated into formal CENELEC EN standards.

8. What requirements do the standards specify?

The standards aim to:

- Achieve adequate de-pollution, treatment and disposal of all types of WEEE in order to prevent pollution and minimise emissions.
- Promote high quality recovery of secondary raw materials.
- Protect human health and safety.
- Prevent illegal (cross boundary) shipments of WEEE and fractions thereof.
- Level the playing field for all actors in the WEEE chain.

The standards are based on the **precautionary principle** and on the principles that preventive action should be taken, environmental damage should as a priority be rectified at source and the polluter should pay. The requirements are also based on the presumption that operators adhere to the principle of **due diligence** with all activities. Due diligence includes understanding of all obligations to which the company is subject and transparency with business partners.

The WEEELABEX standards package structurally consists of three documents, one aimed at operators performing collection of WEEE, one aimed at logistics operators and one aimed at treatment operators.

The normative document on treatment consists of Part I concerning general normative requirements, i.e. pertaining to all types of WEEE, Part II concerning specific normative requirements pertaining to specific types of WEEE, and, finally, a set of annexes stipulating de-pollution guidelines and monitoring principles, requirements concerning batches and rules concerning the determination of recycling and recovery quotas.

Part I concerning general normative requirements in the normative document on treatment distinguishes, apart from clauses with provisions concerning scope, definitions and normative references, between administrative and organisational requirements, on the one hand, and technical requirements on the other.

- Administrative and organisational requirements
 - Legal compliance
 - Technical and infrastructural conditions
 - Training
 - Downstream monitoring
 - Preparation for re-use
 - Shipments
- Technical requirements
 - Handling
 - Storage
 - De-pollution
 - De-pollution monitoring
 - Further treatment
 - Storage of fractions
 - Recycling and recovery
 - Disposal of fractions
 - Documentation

The other two normative documents, on collection and logistics, contain equivalent provisions as those specified in the document on treatment.

Part II concerning specific normative requirements in the normative document on treatment pertains to specific types of WEEE, in particular appliances containing cathode ray tubes (CRT) (the out-of-fashion TV sets), flat panel displays (FPD), lamps and cooling equipment.

9. How will the standards be rolled out across Europe?

At its meeting in Amsterdam on 1 April 2011, the General Assembly of the WEEE Forum approved the standards (consolidated into version 9) and decided that they will not be subject of modifications for a period of 18 months (until 1 October 2012).

- In those 18 months, a number of producer responsibility organisations (PRO) of the WEEE Forum will ‘test’ (parts of) the standards, they will gather experience on their implementation on the ground by the operators. The know-how will be fed back into the project management. The organisations that commit to be part of this **vanguard** of ‘early birds’ in 2011 and 2012 are: Ecodom and Re.Media (Italy), Ecolec, Ecofímica, Eco-asimelec, Ecotic and Eco-RAEE’s (Spain), SENS, SLRS and SWICO (Switzerland), Eco-systèmes (France), Wecycle (The Netherlands), RoRec (Romania), Recupel (Belgium) and Lightcycle (Germany).
- By 31 December 2013, all PROs in the **old member states** – essentially Western Europe – must have the standards integrated into their contracts.
- By 31 December 2014, all PROs in the **new member states** – essentially Central and Eastern Europe – must have the standards integrated into their contracts.
- All WEEE systems in the WEEE Forum will require the operators with whom they have a **contractual relationship** to put all requirements in place.
- In 2012, an assessment of the implementation of the standards will be performed to allow for possible ad-hoc transition periods for specific cases.

Post scriptum

10. Who should welcome this initiative?

Honest and acknowledged parties in the WEEE business are expected to welcome this initiative. Dishonest companies involved in illegal or semi-legal activities, on the other hand, are expected to be suffering from the implications of WEEELABEX.

- **WEEE systems** will no longer have to develop in-house technical requirements, perform less technical audits and be confronted with clear benchmarks.
- **Processing companies** should welcome the initiative, because those who play by the rules and meet existing standards often tend to face fierce competition from companies that apply sub-optimal specifications, or, worse, are engaged in illegal business. In the long run, the WEEELABEX 'label' will separate the wheat from the chaff. Furthermore, WEEELABEX will result in a lesser administrative burden, time savings for those offering services to multiple WEEE systems and a 'label' (visual identifier) underscoring their environmental credentials.
- Market surveillance and enforcement of legal requirements are typically tasks performed by **authorities**. However, due to the fact that under-resourced enforcement agencies are insufficiently familiar with WEEE treatment technologies, market surveillance is deficient. WEEELABEX pro-actively provides for a robust conformity verification scheme at European level.
- A harmonised set of standards will create economies of scale and therefore allow operators in the WEEE processing industry to reduce costs, which will benefit **producers** and **consumers**. But it will also allow producers to position themselves as parties that take corporate responsibility seriously.

Find out more:

Pascal Leroy
Secretary General
pascal.leroy@weee-forum.org

WEEE Forum
www.weee-forum.org

Diamant conference and business centre
Boulevard Auguste Reyerslaan 80
1030 Brussels
Belgium