

Title	AT 05TR Summary Guidance for Treatment and Preparing for Re-use Operators – NON-ACCREDITED ATTESTATION
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1. INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

The primary purpose of this document is to provide a **basic guidance to (candidate) WEEELABEX treatment and/or preparing for re-use operators (hereinafter as “Operator”)**. The document summarizes the essential steps that shall be followed in order **to be NON-ACCREDITED ATTESTED as a WEEELABEX Operator**. In addition, it describes the WEEELABEX non-accredited attestation process and documents, the types of audits and tests that have to be performed, the categories of auditors, the types of non-conformances, the fail/pass criteria and other important information.

This document is based on the **non-accredited WEEELABEX attestation scheme - AT2101**.

1.2 OTHER SOURCES OF INFORMATION

Detailed information about the **non-accredited attestation process** can be found in the document **AT02TR WEEELABEX Attestation Eligibility and Guideline for Treatment and Preparing for Re-use Operators - NON-ACCREDITED ATTESTATION** which is available on the www.weeelabex.org.

The **WEEELABEX Organisation also runs training courses for operators** to provide a more **detailed insight into the Conformity Verification process and an explanation of the WEEELABEX requirements**. More details and dates are available on the WEEELABEX website www.weeelabex.org.

1.3 CONTACT DETAILS

All questions related to attestation can be sent directly to WEEELABEX Organisation:



WEEELABEX Organisation

Address:

U Habrovky 247/11
140 00 Prague
Czech Republic

Responsible person:

Petr Novotny (Managing Director)
office@weeelabex.org

WEEELABEX website:

<http://www.weeelabex.org>

2. WEEELABEX NON-ACCREDITED ATTESTATION PROCESS

2.1 NON-ACCREDITED ATTESTATION – INTRODUCTION

The WEEELABEX non-accredited attestation is a process that consists of several steps. The process starts with the interest of an Operator and ends with “**NON-ACCREDITED ATTESTATION**” of the Operator.

The WEEELABEX attestation conformity verification process described in this document (hereinafter also as “**Attestation**”) is **out of scope of the accredited WEEELABEX certification process**.

2.2 ELIGIBILITY OF TREATMENT AND PREPARING FOR RE-USE OPERATORS

This non-accredited attestation process is **available only for “small-scale” treatment and/or preparing for re-use operators treating less than 500 tons of WEEE a year per one WEEE stream** (WEEE streams are specified in the clause 2.4).

2.3 ATTESTATION CONTEXT

The Attestation indicates that a treatment or preparing for re-use operator complies with the requirements of the WEEELABEX Attestation documents that are based on the **selected requirements of the EN 50625 series standards and EN 50614** (hereinafter as “EN standards”). The Attestation covers **only selected critical requirements** (hereinafter also as “**critical WEEELABEX requirements**”, or “WEEELABEX requirements”), and that is why it **does not indicate any full-scale compliance with the above-mentioned EN standards**.

The critical requirements covered by the Attestation have been determined by the WEEELABEX organisation in order to prove compliance with core elements of above-mentioned EN standards.

2.4 SCOPE

WEEELABEX Audits will be performed against eight WEEE streams enabling Operators to become approved for one or more WEEE streams depending on the type of treatment/preparing for re-use activity they perform (see figure 1).

The following WEEE streams can be individually or collectively included within the scope of an approved WEEELABEX Operator’s Attestation Audit:

- A Large appliance** (WEEE Category 4; may contain electric water boilers/heaters and radiators containing oil belonging to Category 1)
- B Mixed equipment** (WEEE Categories 5, 6; may contain large appliances Category 4 associated with collection and/or treatment of small equipment; may contain radiators containing oil belonging to Category 1)
- C Temperature exchange equipment** (WEEE Category 1)
- D CRT display appliances** (WEEE Category 2) and cathode ray tubes
- E Flat panel display equipment** (WEEE Category 2) and flat panel displays
- F Gas discharge lamps** (WEEE Category 3)
- G Photovoltaic panels** (WEEE Category 4)
- H Other** (other process streams or variations which appear to fall outside of these shall be discussed with the WEEELABEX Office at the time of application. The WEEELABEX Office may refer the matter to the Governing Council for a decision)

Note: The WEEE Categories are based on the DIRECTIVE 2012/19/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 July 2012 on waste electrical and electronic equipment (WEEE)

Each process stream will be determined by the **type of process** carried out:

Type 1: Manual treatment, including all or some depollution.

Type 2: Mechanical treatment (pre-treatment and intermediate treatment), or specific manual treatment, including some or all depollution (where indicated).

Type 3: Advanced mechanical treatment, including some or all depollution (where indicated).

Type 4: End-processing (pure fractions), or incineration / energy from waste facilities.

Re-use: Preparation for re-use process (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).

Only Operators performing Type 1, Type 2 and Type 3 treatments or preparing for re-use process (either singularly or together at the same site) may apply for WEEELABEX Attestation.

2.5 APPROVED AUDITORS FOR ATTESTATION AUDITS

Only **certified WEEELABEX Auditors** are approved to perform WEEELABEX Attestation audits. The list of certified WEEELABEX Auditors is available on the WEEELABEX website: <https://www.weelabex.org/list-of-certified-weelabex-auditors/>.

2.5.1 The following Auditors qualifications are requested for the Attestation audits:

WEEE STREAM		REQUIRED AUDITOR QUALIFICATION
A	Large appliance	WEEELABEX Lead Auditor
B	Mixed equipment	WEEELABEX Lead Auditor
C	Temperature exchange equipment	WEEELABEX Lead Auditor who is qualified as WEEELABEX CFA Specialist auditor as well
D	CRT display appliances and cathode ray tubes	WEEELABEX Lead Auditor
E	Flat panel display equipment and flat panel displays	WEEELABEX Lead Auditor
F	Gas discharge lamps	WEEELABEX Lead Auditor who is qualified as WEEELABEX Lamps Specialist auditor as well
G	Photovoltaic panels	WEEELABEX Lead Auditor
H	Other	WEEELABEX Lead Auditor

2.5.2 Contracting the WEEELABEX Lead Auditor

The Operator contracts directly with the WEEELABEX Lead Auditor or his/her auditing company.

2.6 APPLICATION REQUIREMENTS FOR WEEELABEX OPERATORS

2.6.1 Acceptance criteria

This non-accredited attestation process is available only for **“small-scale” treatment and/or preparing for re-use operators treating less than 500 tons of WEEE a year per one WEEE stream.**

A candidate WEEELABEX Operator shall meet the requirements of documents **AT02TR** WEEELABEX Attestation Eligibility and Guideline for Treatment and Preparing for Re-use

Operators - NON-ACCREDITED ATTESTATION and the terms and conditions set down in the **AT03TR** Agreement for Treatment and Preparing for Re-use Operators – NON-ACCREDITED ATTESTATION.

2.6.2 Application

Candidate WEEELABEX Operators are required to complete and submit the AT01TR Declaration of Intent Form for Treatment and Preparing for Re-use Operators – Attestation to the WEEELABEX Office. The Declaration of Intent shall be submitted for each new Attestation process cycle (it means including each consecutive attestation conformity verification process).

2.7 ATTESTATION AUDITS AND TESTS REQUIREMENTS

There are several categories of Audits and Tests within the WEEELABEX attestation process.

2.7.1 General Audit (performed in year one of the audit cycle)

The General Audit must be conducted **by a WEEELABEX Lead Auditor**. Either the WEEELABEX Lead Auditor or Auditor (if part of the audit team) must have sufficient knowledge of the **local language**, besides English.

2.7.2 Surveillance Audit (performed in year two of the audit cycle)

The Surveillance Audit shall be performed by a WEEELABEX **Lead Auditor** within the **next calendar year** of the listing of the WEEELABEX Operator (but not until six months from the listing and not exceeding six months following the yearly anniversary of the listing).

2.7.3 Specialist Performance Test (applicable only for temperature exchange equipment treatment operators)

Specialist performance tests shall be performed **annually**. It shall be performed and validated by the WEEELABEX CFA Specialist auditor including completion of related reports.

The Specialist Performance Test shall follow the requirements of 'EN 50625-2-3 and CLC/TS 50625-3-4'.

2.7.4 Batch Test (applicable only for WEEE "treatment" operators, not applicable for "preparing for re-use" operators)

Batch tests **have to be performed for each of the process streams** (the subject of the WEEELABEX attestation process) at least every two years.

Batch tests **may be performed by the audited Operator including completion related batch test report**. A batch test report is to be **reviewed and validated by a WEEELABEX Lead auditor**. A batch test for gas discharge lamps is to be **reviewed and validated by a WEEELABEX Specialist Lamps Auditor**. A batch test for **temperature exchange equipment** is to be **reviewed and validated by a WEEELABEX Specialist CFA Auditor**. Validation shall comprise a verification of the documentation, and assessment of compliance with the critical WEEELABEX requirements.

Batch tests may also be required **for fractions of WEEE** (as a result of being >20% of the input stream).

The **minimal volume of input material**, which must be treated during a Batch Test is described in the critical WEEELABEX requirements. The minimum volume may be reduced for **operators treating less than 100 t of one treatment stream per year** (for details see

the WEEELABEX Official **Statement_2016_005** Batch test minimum amounts of input material for small-scale).

Where **only one treatment stream** (and no other material) is processed by a treatment operator, then the operator **may use annual mass balance data to calculate the recycling and recovery rates** (for details see the WEEELABEX Official **Statement_2015_001** Use of annual data instead of a Batch test results).

When required by the critical WEEELABEX requirements, **samples of the output materials shall be taken and sent to an independent laboratory** (or manually analysed where appropriate) for assessment against the limit values set down in the critical WEEELABEX requirements. These documents contain also target and limit values and methods for sampling and for manual and chemical analysis.

2.7.5 Exceptional Audits

Exceptional Audits are audits that fall outside of the General or Surveillance Audit cycle, or Batch or Specialist Performance Tests. They are required **when there are changes in the process, or scope, or for the review of corrective actions**.

2.7.6 Surprise-notice audits

The WEEELABEX Organisation or a WEEELABEX System may exercise its right to request access for additional audits **to assess the WEEELABEX Operator's processes. Surprise-notice audits are planned such that they are targeted to specific areas of the WEEELABEX Operator's activity**.

2.7.7 Appeals Audit

The WEEELABEX Office may exercise its right to request access for an appeals audit **in response to an appeal** being lodged by either a WEEELABEX System or the Operator, **against the outcome of an audit process**.

2.7.8 Audits / Tests duration

Audit duration is the effective time measured in the number of WEEELABEX Auditors and the number of auditor days required to carry out auditing activity. The total audit duration includes on-site time at a treatment facility and time spent off-site carrying out planning, document review, interacting with the Operator and / or facility personnel and report writing. Detailed information can be found in the Annex 1 of AT02TR WEEELABEX Attestation Eligibility and Guideline for Treatment and Preparing for Re-use Operators - NON-ACCREDITED ATTESTATION.

In summary:

	Class III	Class IV
Number of WEEELABEX Lead auditors	1	1
General Audit: duration (on-site)	1 days (1 audit-man-day in total)	1 day (1 audit-man-day in total)
Surveillance Audit: duration (on-site)	1 day (1 audit-man-day in total)	0,5 day (0,5 audit-man-day in total)

The WEEELABEX Lead auditor is expected to be present throughout the General Audit and the Surveillance Audit at all times (the minimum on-site audit duration can be **split** between a personal on-site presence and a web **meeting/webcam distance audit** and distance documents/records review in the ratio up-to 50%).

2.8 ATTESTATION – PASS / FAIL CRITERIA

All questions have been given a specific priority - **Priority 1**: all questions are important and relates to specific objectives set down in the critical WEEELABEX requirements.

The Lead Auditor shall **recommend Attestation the Operator** only when **corrective actions for Priority 1 questions have been efficiently concluded (if any non-conformance identified)**. All non-conformances identified during the General or Surveillance Audit or any Exceptional Audit shall have a maximum of **three months period** where the Operator can take corrective actions.

3. ATTESTATION – COST

The service fees of WEEELABEX Lead Auditor(s) conducting the general and surveillance audits, specialist performance tests and laboratory fees **are not determined** by the WEEELABEX Organisation. The service fees should be **agreed in a separate contract** or agreement between the Operator and the Lead Auditor or his/her auditing company and is subject to free market competition.

The current **WEEELABEX Organisation one time application fees and annual registration fees** are defined in the table below:

	Year 1	Year 2
Application fee (on one-time basis)	250 EUR (disregards number of WEEE streams)	-
Registration fee (on annual basis)	250 EUR (per each WEEE stream)	250 EUR (per each WEEE stream)

4. ATTESTATION

4.1 ATTESTATION OF CONFORMITY

The WEEELABEX Organisation records the **outcome of each WEEELABEX attestation process** and will either:

- a) **grant the attestation of conformity document** and list the WEEELABEX Operator for the audited WEEE streams at the WEEELABEX webpage; or
- b) **decline the attestation of conformity** and not list the (or de-list) candidate Operator.

Before listing the WEEELABEX Operator, the WEEELABEX Office shall review the Audit Summary report and shall review if all the requirements related to the Conformity Verification process are met within 30 working days from the date of receipt of the Audit Summary report.

Attestation of conformity is issued:

- Following the **completion of all the necessary steps** in the WEEELABEX attestation process;
- Following **payment of the application/registration fee**.

4.2 CANCELLATION AND DE-LISTING

The WEEELABEX Organisation may de-list the Operator in specific situations that are described in detail in the document **B03 Agreement for Treatment Operators**.

4.3 APPEAL PROCESS

An appeal can be **initiated by the Operator against the attestation process** or listing / de-listing decision which negatively affects them.

An appeal must be received by the WEEELABEX Organisation **within 15 days of receipt of the decision** to list or not list or de-list the facility or WEEE process stream.