

<b>WEELABEX Organisation - OFFICIAL STATEMENT</b>	
Issue ID:	<b>2014_001</b>
Issue Category:	<b>Legal / Conformity Verification scope</b>
Issue Name:	<b>WEEE in the ferrous metal scrap</b>
Issue Description:	<p>An Operator (it is a combined WEEE operator and a metal scrap recycler) normally treats the WEEE streams, and in addition also accepts the “ferrous metal scrap” material for shredding. This metal scrap, accepted by the metal scrap part of the company, may accidentally contain some amount of un-declared WEEE like LHA, C&amp;F, and CRT. The operators separates only fridges and boilers from this scrap. Other WEEE streams are not separated but are directly shredded without any de-pollution.</p> <p>The question is how to generally evaluate this issue, how to answer the questions 8 and 16 and the eventual impacts on others WEELABEX requirements.</p>
WEELABEX Organisation Statement	<p><b>Is this situation in the scope of WEELABEX CV?</b></p> <ul style="list-style-type: none"> <li>- <b>Yes</b>, in case the shredding of the scrap is performed by the Operator that is asking for CV (it must be the same legal entity), and, alongside, the shredding process is somehow connected with treatment of the WEEE (e.g. the Permit covers all the activities including WEEE and metal scrap, or the shedder is used for treatment of WEEE fractions as well, etc.).</li> <li>- <b>No</b>, in case the shredding of the scrap is not performed by the Operator that is asking for CV (e.g. it is a different legal entity operating at the same place), or the shredding process is not connected with treatment of the WEEE at all (e.g. there is are different permits, isolated processes for WEEE and other materials, etc.). It means, the WEELABEX Auditor has no authorisation to evaluate such a process (the CV does not cover this process).</li> </ul> <p><b>How to evaluate this situation if it is in the scope of CV?</b></p> <p><b>Please note, that the answers may be different depending on the national legislation and the site permit conditions and requirements.</b></p> <p><b>The general approach shall as follows:</b></p> <ul style="list-style-type: none"> <li>- <b>The mentioned situation shall be evaluated as a non-compliance with the permit. It means the situation shall be evaluated as a <u>non-compliance</u> with the <u>Questions 1 and/or 2</u>, respectively.</b></li> <li>- <b>Reasons:</b> <ul style="list-style-type: none"> <li>o The permit usually covers only some WEEE streams. If the Operators shreds also other WEEE that are not in the scope of</li> </ul> </li> </ul>

	<p>the permit - it is a non-compliance. The Operator shall refuse the metal scrap that contains WEEE; or the Operator shall separate all the WEEE and sent it to an authorised treatment facility.</p> <ul style="list-style-type: none"> <li>o Even if the permit covers all WEEE streams that are included in the metal scrap, surely the permit sets down rules for the treatment of the WEEE. It means that shredding of the whole appliances without de-pollution is not in compliance with the permit. The Operator shall separate all the WEEE and shall treat the WEEE streams properly, including the de-pollution.</li> </ul> <p>- <b>The situation shall be evaluated as a <u>non-compliance</u> with the <u>Question 16</u>.</b></p> <p>- <u>Reasons:</u></p> <ul style="list-style-type: none"> <li>o The Operators does not correctly sort the WEEE received into separate treatment streams.</li> </ul> <p>- <b>The situation shall be evaluated as a <u>non-compliance</u> with some other <u>Questions related to de-pollution (from question 38 to question 79)</u>. Please note, that questions 38 – 79 are applicable to the streams under CV only.</b></p> <p>- <u>Reasons:</u></p> <ul style="list-style-type: none"> <li>o If the Operator does not perform the required de-pollution steps, the situation should be evaluated as a non-compliance with some of the questions related to de-pollution as well.</li> </ul> <p>- <b>The situation shall be evaluated as a <u>compliance</u> with the <u>Question 8</u>.</b></p> <p>- <u>Reasons:</u></p> <ul style="list-style-type: none"> <li>o The origin of the WEEE included in the metal scrap is known – it is the supplier of the metal scrap.</li> </ul>
Date of Issue / Date of revision:	<b>26<sup>th</sup> August 2014 / 1<sup>st</sup> March 2021 (defrev_03)</b>
Status of the Statement:	<b>Final Statement - defrev_03</b>