

EuRIC Concrete proposals to implement article 15 of the WEEE Directive

Article 15 unambiguously calls “Member States to take necessary measures to ensure that producers provide information free of charge about preparation for re-use and treatment in respect of each type of new EEE placed for the first time on the Union market within one year after the equipment is placed on the market.” This provision, which was already part of the first WEEE [Directive 2002/96/EC](#), has neither been implemented nor enforced in 2016.

Relevant information about new EEE placed on the market is instrumental for WEEE preparers for re-use and treatment operators as the miniaturisation of EEE, elements used for their manufacturing and substances found in them render their repair and recycling increasingly challenging. It is for these reasons that the importance of information exchange between manufacturers and treatment operators is highlighted on a number of instances in the [Action Plan](#) of the European Commission for the Circular Economy.

Hence, European WEEE recyclers unanimously call for the implementation of article 15 of the WEEE Directive. The proposals made by EuRIC aim at:

- Providing practical inputs in order to guide the implementation of article 15;
- Framing the work to be done by all relevant stakeholders in order to guarantee a target oriented debate with clear deliverables;
- Supporting the cooperation with EEE manufacturers in order to develop fit for purpose measures.

1. Format of the information

Electronic format

Information must be available electronically/on digital platform(s), which is the only format which is easily accessible by relevant stakeholders, open source whenever needed and evolutive (new information can be added over time long after a product has been placed on the market). Paper documents which per nature fail to meet any of these criteria must be excluded. Electronic / digital platform format supports the [European Digital Single Market Strategy](#).

To ensure that information is readily available electronically, particular attention should be paid to experience built over existing information platforms, such as the **International Dismantling Information System (IDIS)**, for ELVs (end of life vehicles) or platforms for recyclers such as the **Recyclers Information Center (RIC)** currently under development by [I-Fixit](#) in collaboration with Fraunhofer IZM (www.izm.fraunhofer.de) & DRZ Wien (www.drz-wien.at), under Horizon 2020.

The use of a centralised, multilingual, open source platform, such as the RIC, presenting information in a standardised format should be favoured over multiple platforms for easy adding and sharing information between manufacturers and treatment operators.

Marking

Use of RFID chips or of QR codes providing an exploded view of the product and information on substances (in particular hazardous ones), type of plastics used, or for WEEE substances, mixtures and components listed in Annex VII must be considered for new and rarer products.

Note: QR Codes were initially designed by the automotive industry for its assembly lines and would be well-suited to the need of treatment operators.
Note: Stickers won't be fit for purpose as they can fall off.





Standardised marking through colour codes: feasibility of colour codes for plastics and for specific components (capacitors, batteries, etc.) of WEEE, in particular the ones containing hazardous substances but not only, should be explored. This would ease a fast identification and removal of these components either manually with fast and accurate workers' training and/or via automation if possible (use of optical sorting technologies) and improve quality control.

2. Content of the information

The information needs to:

- Be presented on a product by product (per EEE category)
- Be presented in a standardised manner

Information per EEE category

Instrumental to tackle the specificities of each appliance category and have an operational added value for treatment operators.

Annexes of the WEEE Directive laying down categories of EEE and indicative list of EEE per category should be used a starting point to define EEE appliance categories for which information to implement article 15 of the WEEE Directive is needed, as this will support consistency with the law. To start with, priority should be given to most commonly recycled WEEE and/or the most challenging ones to treat.

Types of information

Content-wise the information to implement article 15 needs to include:

- Information about substances and components listed in Annex VII of the WEEE Directive
- Composition of the EEE
- Location of the components and substances in the EEE
- Instructions for dismantling / dis-assembly

3. Framework to reach deliverables enabling to implement article 15

The workshop on 8 September 2015 on Implementation of Article 15 of the Directive 2012/19/EU on WEEE Directive and the roundtable on article 15 on 3 February 2016 chaired by organisations representing EEE manufacturers were positive first steps to foster discussions between the different actors of the value chain. In order to achieve concrete results, the following actions are needed:

- The European Commission need to convey as soon as possible a second workshop with the objective to agree on concrete deliverables to implement article 15;

Such a meeting should be structured in order to reach concrete deliverables including i) the type of information useful to treatment operators, ii) technical solutions enabling information exchange and iii) a calendar to be agreed by all parties.

- Foster a structured cooperation between manufacturers and treatment operators.
If workshops are split into different sessions, all of them should be opened to both recyclers and prepare for re-use operators as information and systems to share information can be equally important for both types of operators;
- Open webpage in [DG Environment/WEEE section](#) where presentations made during workshops, including the 1st workshop and roundtable, will be posted and accessible to all stakeholders.

***About EuRIC**

The European Recycling Industries' Confederation, EuRIC AISBL, is the umbrella organisation for recycling industries in Europe. Through its Member Federations from **19 EU and EFTA countries**, EuRIC represents today **across Europe** over:

- **5,500 companies** generating an aggregated annual turnover of about **95 billion €**, including large companies and SMEs, involved in the recycling and trade of various resource streams;
- **300,000 local jobs** which cannot be outsourced to third EU countries;
- **An average of 150 million tons of waste recycled per year** (metals, paper and beyond);