

## When is a conundrum not a conundrum

By Laura Heywood, Secretary of UKCRA and Director of Kleen Strike (UK) Ltd.

Recently EPEAT called for participants regarding the "End of Life" (EOL) criteria for the 1680.2 and 1680.3 (Imaging Equipment and TV) standards for comments to change the wording of a number of criteria in order to align with the 1680.1 and 1680.2 standards. Having been a stakeholder on the development of 1680.2 and participated on the EOL Working Group, Heywood felt it may be useful to inform on what was being discussed and amended.

One of the conference calls included an informational call on European electronics recycling standards and schemes. A topic discussed was the WEELABEX (WEEE Label of Excellence standard) and CENELEC by extension. WEELABEX is a European standard for the treatment and recycling of electrical and electronic equipment waste and for monitoring the processing companies. The number of qualified recyclers is still small, but this isn't implying that there are recyclers that aren't already meeting the level of performance required. In the UK there is only one listed WEELABEX supplier whereas the Netherlands and France have much more.

The aim of this standard is to ensure that "(.....) WEEE management companies do not gain a competitive advantage from implementing less environmentally friendly practices and to improve recycling practices in Europe in respect to collection, handling, storage, recycling, prep-eration for re-use and disposal of WEEE."

Heywood contacted WEELABEX and requested clarification regarding the hierarchy in the WEELABEX system; in particular, if there is a process for used and EOL electronic equipment such as toner and inkjet printer cartridges, now they are included in WEEE. And if there is, is there a requirement that the product (cartridge) is tested for reuse - before considering materials recovery or energy recovery.



Laura Heywood

WEELABEX replied to Heywood's initial contact and explained that: "Preparing for re-use requirements are not extensively dealt in the Standard, but a CENELEC standard on re-use is under preparation".

For clarity, WEELABEX defines both technical and management requirements for operators when EEE is already determined to be waste - the

standard applies to the practical side of the treatment of the waste that has been received or collected

The WEELABEX Organisation is currently adapting the auditing scheme to CENELEC requirements, meaning that soon WEELABEX auditors will audit against CENELEC requirements.

One concern from Heywood is if there should be a condition put on a recycler from a source that delivers cartridge 'waste' to them with the condition they must only enter the recycling stream. According to WEELABEX auditors: "Type three operators, such as recyclers of plastics, batteries or printer cartridges are not in the scope of the WEELABEX auditing scheme yet."

However, saying this, WEEL-ABEX recyclers should take into account that:

1. The standard requires that operators meet the recycling and recovery targets. Thus the recycling, recovery and preparing for re-use of WEEE components and output fractions is preferable to landfilling or incineration. In some cases, (see clause 5.8.1 and page 38 of the

## “ WEELABEX suggest the remanufacturing industry contact the CENELEC working group dealing with the re-use standard? ”

standard, clause 5.3.1) the waste hierarchy is explicitly mentioned in the standard.

2. During the audit, operators are asked to demonstrate how they apply or consider the waste hierarchy in the disposal of output fractions by showing for example their efforts in improving R&R rates etc.

Mr Petr Novotny, the MD of the WEELABEX organization commented:

“It should be noted that not all requirements have the same relevance, and for this reason in order to be WEELABEX compliant, operators must meet a number or priority 1 requirements (e.g. having a permit) and a sufficient number of priority 2 requirements. The requirement on the waste hierarchy for disposal is a priority 2 requirement; this means that for example, an operator sending printer cartridges to landfill may be WEELABEX compliant IF the applicable legislation allows these practices and IF the operator meets all relevant WEELABEX requirements and a sufficient number of priority 2 requirements, BUT in the audit report there will be a comment suggesting the improvement of the management of output fractions.”

WEELABEX suggest the remanufacturing industry contact the CENELEC working group dealing with the re-use standard (still under preparation), and assess how the Industry can support and give feedback to the document and it “would also be good to liaise with producers, take back schemes and WEEE recyclers and let them know about the benefits of remanufacturing cartridges.”

They go on to say WEELABEX auditors “are fully aware that the wording of the WEEE Directive refers to targets on WEEE that shall be prepared for re-use and recycled”.


Novotny goes on to say: “If you have information on the treatment/re-use of printer cartridges that may be interesting for WEELABEX auditors (to help them assess this point in their audits), please feel free to contact us.”

Analysing the response, Heywood comments: “This is our opportunity to



demonstrate to WEELABEX recyclers and all WEEE recyclers the importance of widening the reuse channel for these products over material or energy recovery - and one way would be for cartridge collectors to approach recyclers where it will benefit them to demonstrate how they can channel cartridges for reuse over recycling in their audit.”

Heywood goes on to say: “Recycling over reuse negates the purpose - and the whole ideal - of the waste hierarchy in not only not supporting the circular economy but also in contributing so much to the decline in our moral concern for the future of our planet.”

UKCRA was the spark that encouraged MEP's to include cartridges in the WEEE Directive, when it was first introduced, the clause (originally titled 'Article 4') that a “Product must be designed to be reused...”. This is a significant clause and one of the most important to ever be included in a waste directive. “And with toner and ink cartridges recently included in the recast WEEE Directive, our industry hopes it will widen the reuse channel for these products over material or energy recovery,” Heywood commented. 



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