

Consideration of European standards in German legislation for the treatment of Waste Electrical and Electronic Equipment (WEEE)

Dear Madam,

Dear Sir,

Currently, the European standardisation organisations CEN, CENELEC, and ETSI are developing standard series EN 50625-x, which is related to the treatment of waste electrical and electronic equipment (WEEE), under the European Commission Mandate 518, in support of Directive 2012/19/EU on WEEE. The standard series EN 50625-x is used to assist institutions in carrying out an effective and efficient treatment and disposal of electrical and electronic equipment to avoid environmental contamination and to reduce emissions. The objectives of this standard series are to promote mechanical recycling to support high-quality recovery operations and to avoid improper disposal of electrical and electronic equipment and their parts. Alongside standards for the general treatment of waste electrical and electronic equipment, specific standards for the treatment of types of devices lights, screens, refrigerators and photovoltaic systems are being developed.

A regulation for the treatment of waste electrical and electronic equipment will be prepared in Germany with the aim of improving the treatment of waste electrical and electronic equipment and adapting to the latest science/technique. Relevant for the treatment of household appliances, the volatile fluorocarbons or volatile hydrocarbons (for example, refrigerators), is the revision of **Technical Guidelines for Air Pollution Control** (German Clean Air Act). For these devices, the European Standard EN 50574 and their associated Technical Specification TS 50574-2, which are currently being transferred to the standards EN 50625-2-3 and TS 50625-3-4 apply.

Unless the European Standards EN / TS 50625-x, and EN / TS 50574 are observed in the preparation of German legislation, environmental organisations ECOS (European Environmental Citizens' Organisation for Standardisation), DUH (German Environmental Aid), KNU (Coordination Office Standardization of environmental associations) and BUND (Friends of the Earth Germany) see the risk that a future implementation of standards will either be difficult, or impossible in German law. From the perspective of environmental organisations, European standards represent the state of the art and contribute towards avoiding negative environmental impact of the treatment of waste electrical and electronic equipment. In the field of refrigeration units, the existing German regulations are not sufficient enough to ensure a treatment according to the state of the art methods in this field.

We therefore call on legislative authorities in Germany to prevent this conflict with German law and European standardisation efforts and to refer to and define the European Standards, EN / TS 50625-x and EN / TS 50574 respectively in German law as soon as possible.

ECOS, DUH, KNU and BUND hope for your support in this matter.

Should you have any questions, do not hesitate contacting:

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