6th Workstream

15/03/2024 - CRM

CEN-CLC/JTC 10 'Material efficiency aspects for products in scope of Ecodesign legislation' – An inspirational story for CRMs?

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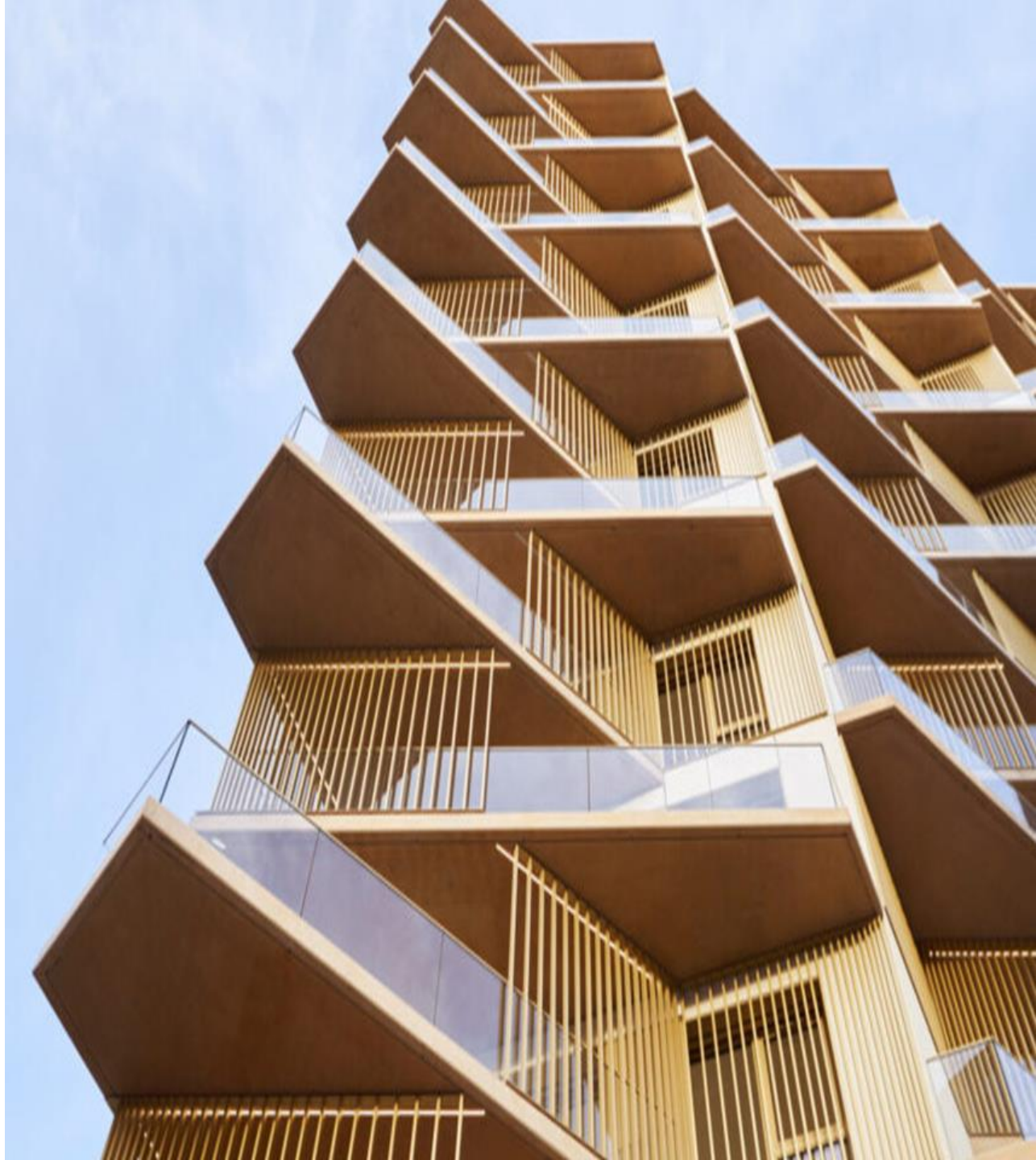


La coalition environnementale sur les standards

est une ONG internationale dotée d'un réseau de membres et d'experts qui défendent des normes techniques, des politiques et des lois respectueuses de l'environnement.

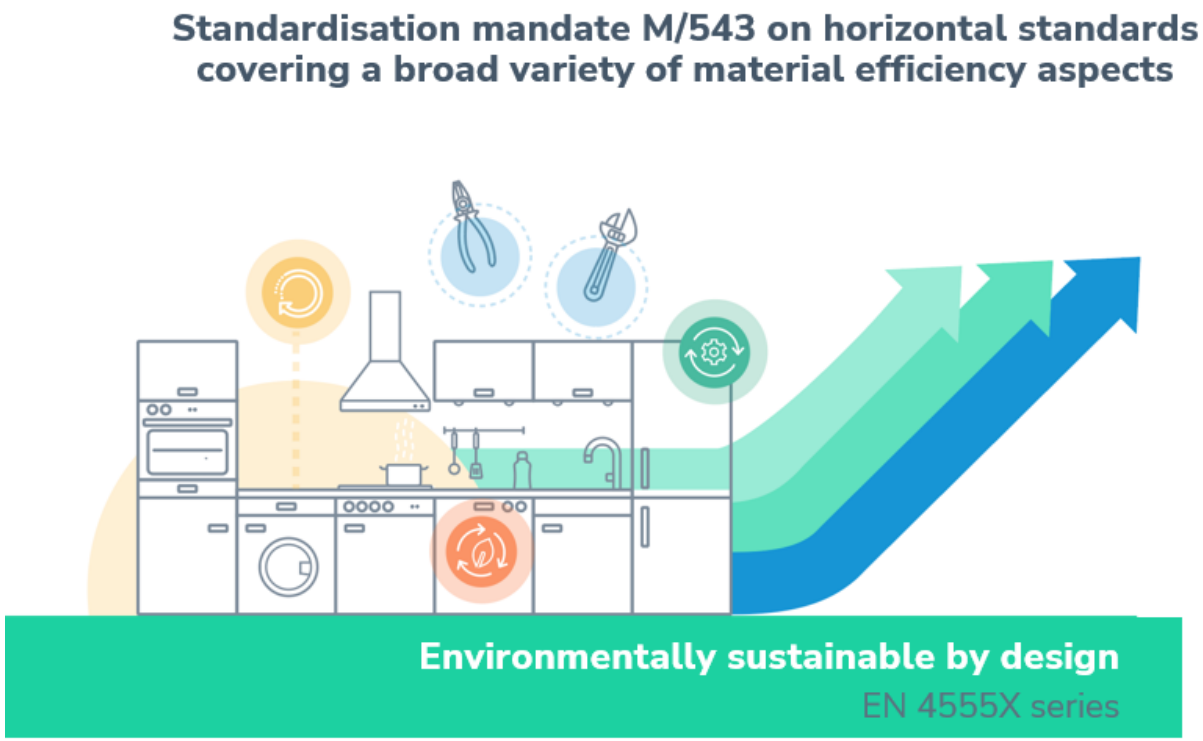
In a nutshell

International environmental NGO

Technical expertise

Network of members and experts

Standardisation mandate M/543 on horizontal standards covering a broad variety of material efficiency aspects



CEN-CLC/JTC 10 'Material efficiency aspects for products in scope of Ecodesign legislation'

CEN-CENELEC - JTC10 – EN4555x series

What difference did we make?

- We were **the only organisation** consistently promoting the environment in the process of drafting of these standards.
- We worked to **develop robust methods**, difficult to circumvent - a major step towards better design and waste reduction for products ranging from household appliances to consumer electronics.
- We made sure the adopted **methods would not lead to greenwashing** and false claims, for instance in the case of calculating recycled content, where we successfully pushed for post-consumer recycled material to be considered separately, as pre-consumer waste does not foster a circular economy.
- We **convened the Working Group** on repairability, preventing delays in its work, and leading the group to finalising the ambitious deliverables on time.

Why does it matter?

These new standards can be used to ensure material efficiency aspects, such as product durability, repairability or recyclability, are considered in future ecodesign regulations and product-specific European standards. They could also be the **base for a repairability score for products**, for instance giving consumers a reliable indication of the recycled content in the products they buy, and ultimately they should **help reduce the mountain of e-waste**.

CEN-CENELEC - JTC10 – EN4555x series

TR 45550	Definitions related to material efficiency
TR 45551	Standards use guide
EN 45552:2020	Durability
EN 45553:2020	Ability to re-manufacture
EN 45554:2020	Ability to repair, reuse and upgrade
EN 45555:2019	Recyclability and recoverability
EN 45556:2019	Proportion of re-used components
EN 45557:2020	Proportion recycled material content
EN 45558:2019	Use of critical raw materials
EN 45559:2019	Methods for providing information

EN 45554:2020 – General methods for the assessment of the ability to repair, reuse and upgrade energy-related products

ECOS supports this standard as it defines parameters and methods relevant for:

- Assessing the ability to repair and reuse products the ability to upgrade products, excluding remanufacturing;
- Assessing the ability to access or remove certain components, consumables or assemblies from products to facilitate repair, reuse or upgrade
- Defining reusability indexes or criteria (scoring approach)

EN 45555:2019 – General methods for assessing the recyclability and recoverability of energy-related products

This European standard (EN) provides a general methodology for:

- Assessing the recyclability of energy-related products
- Assessing the recoverability of energy-related products
- Assessing the ability to access or remove certain components or assemblies from energy-related products to facilitate their potential for recycling or other recovery operations.
- Assessing the recyclability of critical raw materials from energy-related products.

EN 45555:2019 – General methods for assessing the recyclability and recoverability of energy-related products

- ECOS supports EN 45555:2019: The standard provides a useful foundation as a preliminary standard in the area of recyclability and its principles could be transposed to the recyclability and recoverability of other types of products.
- However, it doesn’t go as far as suggesting a recyclability and recoverability scoring approach, as is the case in the repairability standard

EN 45557:2020 – General method for assessing the proportion of recycled material content in energy-related products

ECOS supports EN45557: The standard provides a useful foundation as a preliminary standard in the area of recycled material content and the methodology could be used for other categories of products or materials, including CRM. However, we consider that the next revision should consider the following:

- Allocations: The mass balance should represent something physical. ECOS/RETHINK PLASTIC/ZERO WASTE EUROPE - Determining recycled content with the mass balance approach)
- Defective products: It needs to be clarified whether defective products should be considered pre- or post-consumer recycled materials.

$$R_{post} = \left(\frac{\sum_k m_{tot,k} \times r_{post,k}}{\sum_k m_{tot,k}} \right) \times 100\ \%$$

[EN 45557]

EN 45558:2019 – General method to declare the use of critical raw materials in energy-related products

- SR M/543 mandates to consider the "Use and recyclability of Critical Raw Materials to the EU, listed by the European Commission".
- This standard facilitates this requirement by describing appropriate information on critical materials.
- ECOS did not actively contribute to this standard

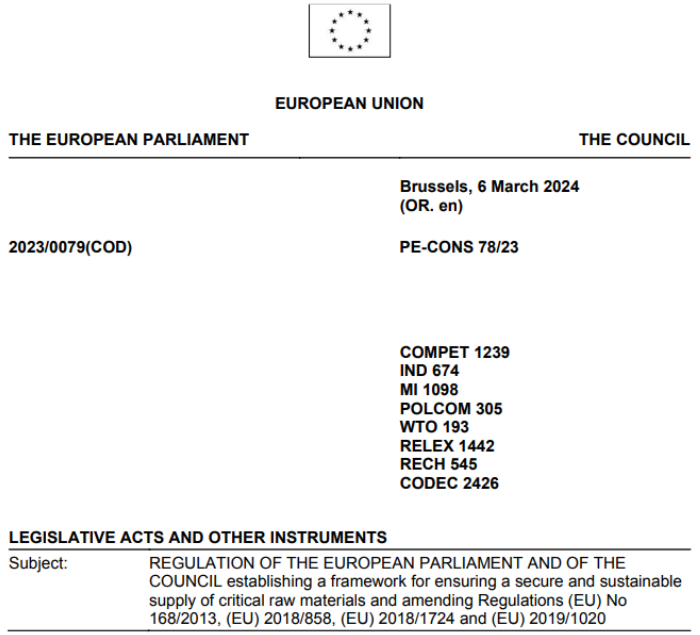
Circularity in the Critical Raw Materials Act

Article 26 National measures on circularity

Article 27 Recovery of critical raw materials from extractive waste

Article 28 Recyclability of permanent magnets

Article 29 Recycled content of permanent magnets



EUROPEAN UNION

THE EUROPEAN PARLIAMENT — THE COUNCIL

Brussels, 6 March 2024
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2023/0079(COD) — PE-CONS 78/23

COMPET 1239
IND 674
MI 1098
POLCOM 305
WTO 193
RELEX 1442
RECH 545
CODEC 2426

LEGISLATIVE ACTS AND OTHER INSTRUMENTS

Subject: REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020

Brussels, 6 March 2024 (OR. en) 2023/0079(COD), REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020

Is it enough for CRMs?

- **European standardisation should support CRM Regulation Articles 26-29**
- **Limits of EN 4555X and upcoming revision M/534**
- **Ecodesign products VS products containing CRMs**
- **Horizontal approach should be kept**

Thank you

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