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Via Email to: novotpet@weeelabex.org

24th June 2021

Ensuring a high quality of WEEELABEX-audits for cooling and freezing appliances

Dear Mr. Novotný,

We are concerned that high quality requirements of WEEELABEX audits for cooling and freezing appliances (CFA) are not fully implemented. In fact, there are indications that incomplete and deficient audits are tolerated without any consequences. As a recent study revealed that that 6.3 Million tons of CO₂-equivalent emissions could be saved every year if treatment of CFA would meet CENELEC requirements throughout Europe¹, the matter is more urgent than ever. Against this background, we would like to ask you some questions and call on you to ensure maximum transparency to the benefit of a reliable and independent WEEELABEX label:

1. How many WEEELABEX audit reports based on EN 50625-2-3 and TS 50625-3-4 did second educated and specialized auditors check for plausibility, correctness and compliance with WEEELABEX-CENELEC rules? Please specify the total number of CFA audits as well as the number of professional reviews of CFA audit reports for the years 2019 and 2020.
2. How much time does the review of a completed WEEELABEX audit report usually take? Please specify for the abovementioned reviews of CFA-related audits in 2019 and 2020 a) date of the final report b) date of submission to the reviewing auditor and c) date of final decision from the reviewing auditor.
3. Does the reviewing auditor of a WEEELABEX report based on EN 50625-2-3 and TS 50625-3-4 have full access to all data (measured values, laboratory results, calculations) necessary to assess correctness and plausibility of an examined audit thoroughly?
4. How does WEEELABEX guarantee regular monitoring of all practicing auditors and prevent that one practicing auditor is not always reviewed by the same other reviewing auditor?
5. What would be the consequences if a reviewing auditor identifies discrepancies during a review or the original auditor refuses provision of background data (see question 3)? Would the respective

¹ Umweltbundesamt GmbH and Dr. Brüning Engineering UG (2021): Study on quality standards for the treatment of waste electrical and electronic equipment (WEEE); study commissioned by EU-commission

certificate become invalid? Would practicing auditors lose authorization to carry out audits under the label of WEEELABEX?

We vote for an auditing system in which all finished audits based on EN 50625-2-3 and TS 50625-3-4 are reviewed by another educated and specialized auditor before issuing the respective certificate. A merely formal review of all audit reports is not sufficient. If any doubts arise during revision, the reviewing auditor must be granted full and immediate access to all data necessary to assess correctness and plausibility of the audit thoroughly – even if this delays the certification processes. Demonstrably faked auditing activities under the label of WEEELABEX must have severe consequences that may lead to loss of auditing permission as a last resort.

Due to the very high environmental relevance of the issue, we kindly ask you to answer our questions before **14th of July 2021**. Please do not hesitate to contact us in case of any questions.

Yours sincerely,



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Environmental Action Germany
Deputy Executive Director DUH



Olaf Bandt
BUND/Friends of the Earth Germany
Chairperson



Fanny Rateau
ECOS
Programme Manager



Stéphane Ardit
EEB European Environmental Bureau
Senior Policy Officer Waste