



Document Solutions

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Legislation

LPR
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The European Directive for electrical and electronic equipment

According to the WEEE Directive, shipping of used electrical and electronic devices does not constitute waste transport if relevant and valid documents are provided confirming that the transport takes place within the framework of a transfer agreement among commercial operations and that the items are being shipped to the manufacturer or a third party acting in the manufacturer's name within the framework of a valid contract agreement with intent to reuse them to countries in which Decision C(2001)107/FINAL of the OECD Council concerning amendment of the Decision C(92)39/FINAL Concerning the Control of Transfrontier Movements of Wastes Destined for Recovery Operations is in force.

Sources:
<http://acts.oecd.org/Instruments/ShowInstrumentView.aspx?InstrumentID=221&InstrumentPID=217&Lang=en&Book=False>
<http://www.oecd.org/env/waste/42262259.pdf>

DIRECTIVE 2008/98/EC OF THE EUROPEAN PARLIAMENT AND THE COUNCIL of 19 November 2008 (WASTE FRAMEWORK DIRECTIVE) on waste and repealing certain directives on waste and making reference to extended producer responsibility for waste collection systems, recycling and waste classification.

Paragraph 17: Waste collection schemes which are not conducted on a professional basis should not be subject to registration as they present a lower risk and contribute to the separate collection of waste.

Professional operation of a collection system by the manufacturer is not the case here, since the manufacturer of the LPR Takeback system bears all costs.

Paragraph 27: The introduction of extended producer responsibility in this Directive is one of the means to support the design and production of goods which take into full account and facilitate the efficient use of resources during their whole life-cycle including their repair,

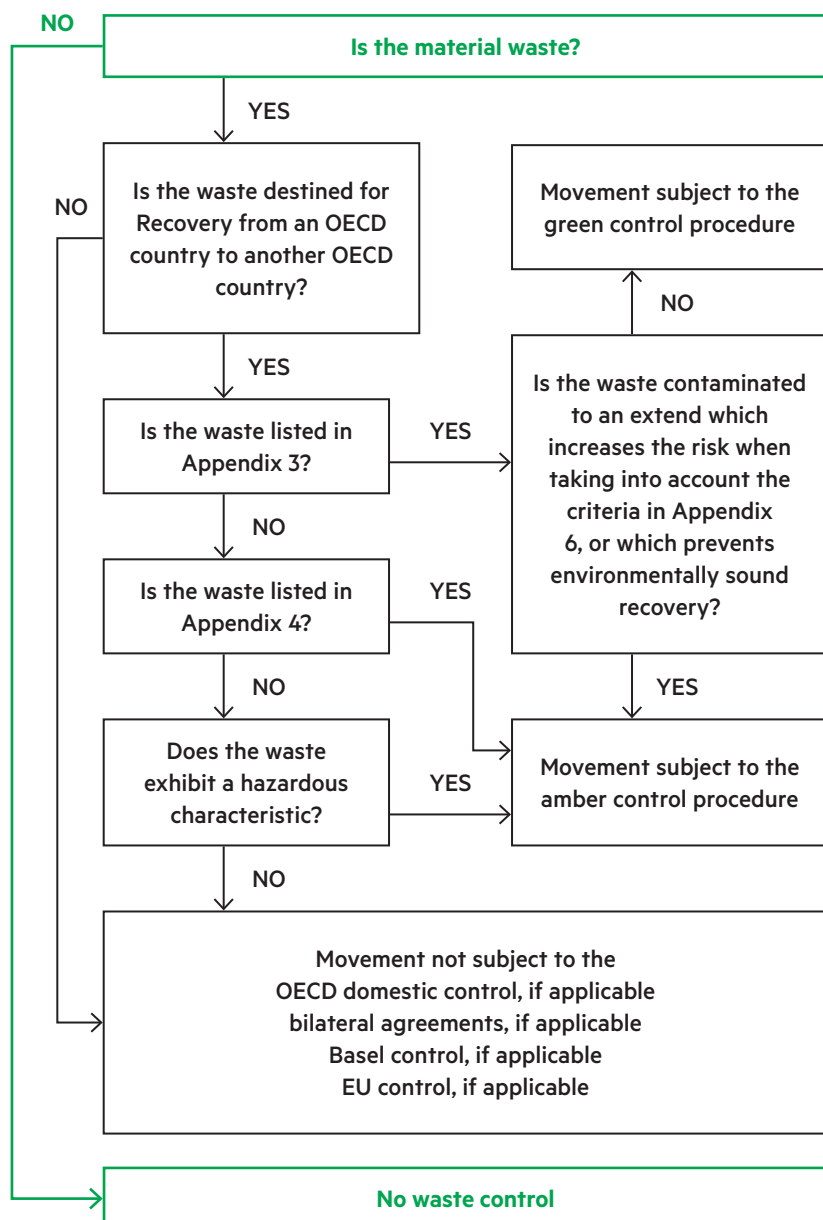
re-use, disassembly and recycling without compromising the free circulation of goods on the internal market.

Also, Article 6 of this Directive defines whether the recovered empty toner cartridges constitute waste:

Article 6): **Certain specified waste shall cease to be waste when it undergoes a recovery, including recycling.** Waste which ceases to be waste shall also cease to be

waste for the purpose of the recovery and recycling targets set out in Directives, 2002/96/EC OF THE EUROPEAN PARLIAMENT AND THE COUNCIL of 27 January 2003 on Waste Electrical and Electronic Equipment.

Sources:
<http://eur-lex.europa.eu/legal-content/DE/TXT/?uri=celex%3A32008L0098>
<http://eur-lex.europa.eu/legal-content/DE/TXT/?uri=celex%3A32002L0096>



LPR Takeback

Regarding the transport, the list of the European Commission (COM 2000/532/EC) (also known as the EAV or EURAL List) differentiates “hazardous wastes” and “non-hazardous wastes”. In this list, empty toner cartridges are classified as per the Code 08 03 18 as “non-hazardous wastes”. It is therefore permitted to transport the toner cartridges in the LPR Takeback boxes across borders within the EU.

Source: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2000D0532:20020101:EN:PDF>

Furthermore, OECD Council Resolution [C(2001)107/Final] defines the control procedure for wastes that are transported. Depending on the classification, specific transport control procedures are assigned to the specific waste types and their definition. Wastes are thereby differentiated as to whether they are destined for:

- a) disposal (e.g. landfill) or
- b) reuse (e.g. recycling) and as to whether they are
- c) so-called “green wastes” or
- d) so-called “yellow wastes”

Thus the disposition of the wastes is first decided on as per a) and b).

The empty toner cartridges in the LPR Takeback system are reprocessed in a recycling works and returned to the raw material cycle. They therefore fall under reuse category b).

The LPR Takeback system recycling works is certified by the authority responsible for the site, OVAM, at the location in Belgium. The empty toner cartridges may therefore be exported in the LPR Takeback boxes.

Source: http://ec.europa.eu/environment/waste/shipments/pdf/list_competent_authorities.pdf

Within this disposition, the disposition procedure is then determined and assigned R Codes. R Codes 3 and 4 apply to the toner cartridges in the LPR Takeback system.

Once the matter of the disposition of the wastes has been clarified, the legislation differentiates the waste types. Accordingly, the toner cartridges in the LPR Takeback system must be classified in the categories are classified as c) “green wastes” or d) “yellow wastes”. The above-mentioned OECD Council Resolution listed electronic wastes under the code: GC020 in the category “green wastes”.

Source: <http://webnet.oecd.org/oecdacts/Instruments/ShowInstrumentView.aspx?InstrumentID=221&InstrumentPID=217&Lang=en&Book>

Since the description of the above-mentioned code GC020 only explains the term “electronic waste” in a general sense, a supplemental explanatory document to EC Regulation No. 2013/2006 is provided as the so-called “Guideline No. 8”. This document makes reference to toners, which are classified with No.: 160216 under the code: GC020 / Electronic Wastes, thus clearly identifying them as “green wastes”.

Source: http://www.bmub.bund.de/fileadmin/bmu-import/files/pdfs/allgemein/application/pdf/anlaufstellen_leitlinien_8_en_bf.pdf

Therefore, the empty toner cartridges in the LPR Takeback system are wastes in the so-called „Green List“ and can be transported across borders within the Inner EU Market without a permit and within the framework of the free movement of goods within that market, whereby a register of the shipment with the authorities or provide prior notification of it is not required, if the specific weight per shipment is below 20 kg. This is mentioned at Article 3, No. 2 of the Regulation (EC No. 1013/2006) of the European Parliament of 14 June 2006.

This also covers all parcel-shipments up to 20 kg.

This legislation does not require prior notification of and approval by the authorities.

Therefore, the LPR Takeback boxes, with a total weight of up to 20 kg, can be transported across borders within the framework of the free movement of goods in the Inner European Market without prior or subsequent documentation.

Source: <http://eur-lex.europa.eu/legal-content/DE/ALL/?uri=CELEX%3A32006R1013>

Based on the above-mentioned legislation, this constitutes directly applicable law in the member countries.

Return to the material cycle

After pickup, the materials are subjected in our recycling works to a multi-stage process of sorting, shredding and separation. The materials are then returned to the raw material cycle.

LPR
Takeback



Impressions of the plant



Final products following recycling (amounts as % based on average assessments)



Permit issued by (OVAM)



Operating permit



ISO 9001



ISO 14001



ISO 18001