

Comments received in the 1st round of Stakeholder Consultation and responses and resolutions provided by the CEWASTE Project Consortium

Note: Page, line, clause and figure numbers refer to V5 and V6 of the document.

Comment no.	Page	Line no.	Clause no.	Figure/ Table no.	Type of Comment	Comment / Issue	Proposed change	Response & remarks from project partners	Resolution
1	10	22	Purpose		Specific comment	Add after EN 50625, that this European Standard was elaborated under European Commission's Mandate M/518 (Mandate to the European standardisation organisations for standardisation in the field of Waste Electrical and Electronic Equipment (Directive	Add after EN 50625, that this European Standard was elaborated under European Commission's Mandate M/518 (Mandate to the European standardisation organisations for standardisation in the field of	Revised accordingly.	Addressed
2	11	74	Notes to the reader		Editorial comment	Clause 4 on 'management requirements' incorporate also the sustainability and traceability		Revised accordingly.	Addressed
3	11	61-64	Notes to the reader		Editorial comment	"The main principle followed while developing the CEWASTE Requirements was to assess (a) how the existing CENELEC 50625 requirements are specifically addressing CRM recycling and (b) which the gaps are to improve the CRM recovery." The second part is not clear - made a proposal, but not sure I understood what was meant.		Revised accordingly.	Addressed
4	11	40	Purpose		Editorial comment			PENDING in the final reading.	Addressed
5	11	57-58	Purpose		Editorial comment	"When the existing requirements were not fulfilling the project's objectives new set of requirements have been developed." This addresses two cases - where we introduced CRM aspects into something existing and where we added a complete new requirement where the current standard had shortcomings in relation to the objectives. The case of missing requirements was probably more common but it does not read from the formulation which sounds like we checked if CENELEC complied with our objectives. Hope you understand what I mean - see the proposal		Agree. Revised accordingly.	Addressed
6	12	60	Notes to the reader		Editorial comment	Correct designation from CENELEC 50625 to EN 50625 (to be changed throughout the whole document), because CENELEC is the acronym of the Standardization Organization	Replace CENELEC 50625 by EN 50625 (to be changed throughout the whole document)	Revised accordingly.	Addressed
7	13	91	Notes to the reader		Specific comment	traceability is not only a recommendation, but partly mandatory	specify for which waste streams traceability is mandatory	Revised accordingly.	Addressed
8	13	91-92	Notes to the reader		Editorial comment	"Requirements on traceability (4.6), on local communities well-being (4.10.1) and on contribution to society (4.10.3) have the status of recommendations." For traceability this is in contradiction for lead acid and printed circuit board. I think the easiest solution would be to erase traceability here and add it to the relevant sentence in line 83-84 above - see proposal.	Traceability requirements are placed in clause 4.6 and apply to lead-acid waste batteries and printed circuit boards. For other waste fractions these clauses have the status of recommendations.	Revised accordingly.	Addressed
9	14	128	Notes to the reader		Editorial comment	The explanation provided in lines 128 till 169 is already provided above in lines 29ff but with lower detail and perhaps other intention.		Revised accordingly. Deleted in the 'Notes to the Reader' part.	Addressed

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10	16	172	Introduction		Specific comment	Where is the term "valuable" defined and what is the difference to CRM? Some of the CRMs are e.g. precious metals and therefore also valuable!	Clarify wording and adapt document accordingly.	Revised accordingly. The term 'valuable raw materials' was defined. CRM is defined for Europe (2017 list. EC Com2017). Valuable materials include Au and Ag which are not in the EU list.	Addressed
11	16	174	Introduction		Specific comment	What is a "sustainable treatment process"?	Extend the list of definitions and use a more precise wording in the report.	Revised accordingly. Definition was added.	Addressed
12	16	183	Introduction		Specific comment	Add after EN 50625, that this European Standard was elaborated under European Commission's Mandate M/518 (Mandate to the European standardisation organisations for standardisation in the field of Waste Electrical and Electronic Equipment (Directive 2012/19/EU (WEEE))).	Add after EN 50625, that this European Standard was elaborated under European Commission's Mandate M/518 (Mandate to the European standardisation organisations for standardisation in the field of Waste Electrical and Electronic Equipment (Directive 2012/19/EU (WEEE))).	Revised accordingly in the 'notes to the readers' part.	Addressed
13	16	189	Introduction		Specific comment	Why traceability requirements apply only to operators handling and treating lead acid batteries and printed circuit boards? CRMs are in other parts of electronics, too, such as the magnets in the signal reception and the speakers. What about other types of batteries?		Traceability requirements are voluntary for magnets, and other WEEE as this was decided by the consortium.	Addressed
14	16	191	Introduction		Specific comment	This can stand in contradiction to the mostly missing economic viability of CRM recovery. Therefore business models have to be adapted in order to set the framework for making CRM recovery economically viable.	Define a set of framework conditions for a successful CRM recovery.	PENDING. It will be addressed in V7	Addressed
15	16	197	Introduction		Editorial comment	TYPO - repeating word "acid"	Correct - delete "acid"	Revised accordingly.	Addressed
16	18	238-250	1		General comment		Adjust baseline report or make up the missing piece in this report.	PENDING. It will be addressed in V7	Addressed
17	18	234	1.1		Editorial comment	There is no explanation of "PMs"	Explain the "PMs"	Revised accordingly. Not needed.	Addressed
18	18	218	Scope		Editorial comment	Instead of "This document define:" better to write "... specifies:"	Instead of "This document define:" better to write "... specifies:"	Revised accordingly.	Addressed
19	18	218	Scope		Editorial comment	This document define		Revised accordingly.	Addressed
20	18	219	Scope		Specific comment	What is meant with "governance performance"?	Extend the list of definitions.	This is the EC language in the call so we kept it. Moreover, the term is not used in the requirements, so, a definition is not needed.	Addressed
21	18	229	Scope		Specific comment	Why are traceability requirements only defined for lead-acid batteries and PCB?	Explain in the report (maybe I missed this?)	Revised accordingly. This is now clarified in the notes to the reader.	Addressed
22	19	246	1.1		Editorial comment	Desktop computers & professional IT equipment (Sm,...) I assume as in the other components that "excluding batteries needs to be added here as well.		Revised accordingly.	Addressed
23	19	259	1.2		Editorial comment	TYPO - repeating "("	Correct - delete "("	Revised accordingly.	Addressed
24	19	259	1.2		Specific comment	Please add a definition of end-of-life. For example, it is important to explain if it is a synonym of waste and if not what is the difference between waste and end-of-life		Revised accordingly. A definition was added. In the context of CEWASTE the definition is comparable to waste.	Addressed

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25	19	267	1.2		Specific comment	the definitions of the value chain steps could reflect the waste hierarchy, where recycling is separated from recovery, which may include energy recovery and other recoveries, whether recycling includes also the reuse of parts without necessarily extract the secondary materials from them. Just a suggestion to double check definitions of recycling and recovery in European legislation.		PENDING. It will be addressed in V7	Addressed
26	20	278	2		General comment	Wrong designation of the CENELEC Technical Specifications: Replace CLS/TS with CLC/TS throughout the whole document	Replace CLS/TS with CLC/TS throughout the whole document	Revised accordingly.	Addressed
27	20	286	2		Editorial comment	Put the footnote number at the end of the title and not after EN (EN1) because this can be read as EN 1 50625-1. But better to add the content of the foot note at the end of Clause 2:	Delete Footnote and add at the end of Clause: European Standards can be obtained from national members of CEN (European Committee for Standardization) or CENELEC (European Committee for Electrotechnical Standardization) as national standards because European Standards have to implemented unchanged as national standards by national CEN/CENELEC members.	Revised accordingly.	Addressed
28	20	278-290	2		General comment	harmonise if "treatment" starts with a capital T or not. I think it should be small letter...		Revised accordingly.	Addressed
29	21	302	2		Specific comment	We suggest to add "Technical guidelines on transboundary movements of electrical and electronic waste and used electrical and electronic equipment, in particular regarding the distinction between waste and non-waste under the Basel Convention (E-waste)", April 2019		Revised accordingly.	Addressed
30	22	304	3		Specific comment	This line refers to a glossary, however the glossary has not been included in the document, which is a bit odd.	Include the glossary in the document or specify where it can be found.	Revised accordingly.	Addressed
31	22	321	3		General comment	can a claim only be linked to a Lead Acid battery ? Surely it is a generic term so rather say "as an example for a claim"..		Revised accordingly.	Addressed
32	22	400	3.14		Editorial comment	TYPO - "("	Correct - delete "("	Revised accordingly.	Addressed
33	22	320-322	3.3		Specific comment			Revised accordingly.	Addressed
34	22	310	INTRODUCTION		Editorial comment	Error in the text "annex 1 of {COM(2017) 490 final}"	Correct the link.	Revised accordingly. This is listed in the 'Bibliography'	Addressed
35	23	345	3		Specific comment	It would be good to show correlation to the Basel disposal operations (annex IV of the Basel Convention)		PENDING. It will be addressed in V7	Addressed
36	23	345	3		Specific comment	"Final treatment" is here only defined for metals, should include other raw materials as well (i.e. plastics); the same applies for Final Treatment facility	Adjust definition.	Revised accordingly.	Addressed
37	24	357	3		Specific comment		Adjust definition.	PENDING. It will be addressed in V7	Addressed

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38	25	389	3		Specific comment	Is the target audience the EU countries? If not (developing countries), it would make sense to refer the Basel Convention and use the term "transboundary movement" instead		Revised accordingly. A mentioning to transboundary movement was added.	Addressed
39	25	390	3		Specific comment	1. Clarify if disposal is final disposal. 2. Clarify if recovery includes recycling. 3. Harmonize with the definitions of the Basel Convention for movements outside the EU. In this case, reference should be to States. 4. and inclusion of Party to Party and Party to non-Party movements under the chapter shipments would be called TBM (see other note below). 5. Reference should be made to the Basel Convention and the Technical Guidelines mentioned above		Revised accordingly. 1. It is final disposal. 2. As per the European Definition, recovery includes recycling and could include energy recovery. In the context of CEWASTE recycling does not include energy recovery. The definitions of recovery and recycling have been now added. 3. Country was replaced with State. Your point was correct. 4. The notion of party was introduced in the 'shipment' definition. 5. A reference to the Basel Convention was added in the definition of shipment.	Addressed
40	25	400	3		Editorial comment	Move the "(" to line 401 "("("g)	Move the "(" to line 401 "("("g)	Revised accordingly.	Addressed
41	26	419	3		Specific comment	Definition of WEEE should be added and explanation of how parts are dealt with. Why Waste batteries are not WEEE? If these are WEEE than it should be WEEE, including waste batteries and not WEEE and waste batteries (as it is in the whole standard).		Revised accordingly. A definition was added according to the EC. WEEE includes waste batteries but for the purposes of this document consider the extensive guidance provided, waste batteries is highlighted in the title and the 'reason why' explained in the introduction.	Addressed
42	26	421	3			We are missing the term of the Environmentally Sound Management which should be the reason this scheme is established in our understanding.		PENDING. It will be addressed in V7	Addressed
43	26	421	3		Specific comment	Other two terms "Minimization" and "waste management hierarchy"		PENDING. It will be addressed in V7	Addressed
44	27	422	4		General comment	The document contains many paragraphs which define requirements applicable to any type of waste/WEEE and to our understanding goes far beyond the scope of CEWASTE. It also repeats too many things which are written elsewhere or are already included in 50625 or other relevant documents. The document could be shortened a lot it would only cover CEWASTE relevant aspects!	see also comment No. 2	PENDING. It will be addressed in V7	Addressed

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45	27	432-433	4		Specific comment	This line refers to requirements that apply to collection points, referring to "the requirements established in clause 4.2 of TS 50625-4". The relevance is clear, however there is only one requirement that is relevant to collection points, where as some are relevant to collection facilities (the entity responsible for collection...). Furthermore, though collection points are not explicitly out of scope, I don't think we shall audit collection points (I don't think a supermarket shall seek to be CEWASTE certified) and I don't think that we have any new requirements for collection points (this one is a CENELEC one so also not one of our new ones...) so I am wondering if collection points should be excluded from scope in the scope chapter and this requirement modifies accordingly. In light of the above it is not clear how the current requirement as it is formulated can be audited.	1 - consider if collection points should be kept in scope. 2 - modify requirement so that it applies not only to collection points. Proposal: "Collection points are only required to apply the requirements established in clause 4.2 of TS 50625-4. Collection and logistics facilities responsible for transport of collected waste from the collection point shall also comply with this clause."	PENDING. It will be addressed in V7	Addressed
46	27	434-435	4			Note first sentence is confusing-rephrase		Revised accordingly.	Addressed
47	27	438-439	4		Editorial comment		Update clause number	Revised accordingly.	Addressed
48	27	442-447	4		Specific comment	An organisation cannot decide what to comply with and what not to. The auditor can take into account that the organisation is small and has less facilities and thus maybe not all requirements are relevant, but anything relevant needs to apply to the organisation. It's not about being an SME and having less resources but only relevant where there are no facilities related to a specific requirement. I would erase this note as it can be understood that a facility can decide what requirements it applies. How the requirement is fulfilled shall vary from facility to facility, but all requirements need to be complied with. If the formulation can be misunderstood than it should at least be reformulated to ensure certainty.	Propose to erase this note or to reformulate so that it is clear that a facility cannot decide what to comply with and what not to.	Comment discussed and agreed with SGS	Addressed
49	28	469	4		General comment		Revise text.	Revised. Most of the text was deleted.	Addressed
50	29	475	4.3			Delete: and others that the operator decides to 533 comply with considering their relevance for implementing CEWASTE in their facilities		Revised. Also more clarification on exclusions cases were added	Addressed

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51	29	474-480	4		General comment	We think it is not a good idea to make this restriction. How to later identify which parts are CEWASTE audited and which not?	A legal entity which handles CRM related equipment should as a whole comply with CEWASTE requirements.	Revised accordingly. The text now reads: 'The operator shall first determine the facilities, activities, sites, as well as associated temporary or mobile facilities that are relevant to the CEWASTE standard which shall be included in the scope for which it claims conformity with the CEWASTE requirements. If any exclusion, this shall be justified in internal records of the operator.'	Addressed
52	29	478	4.3		Editorial comment			Revised accordingly.	Addressed
53	29	494	4.3		Editorial comment	"processing operations should pursue for iterative cycles following the plan-do-check-act (P-D-C-A) sequence of " I believe you mean four and not for		Revised accordingly.	Addressed
54	29	497	4.4		Editorial comment			Revised accordingly.	Addressed
55	30	509-510	4		Specific comment	Difficult to understand the consequence of this sentence...	Revise text.	Revised accordingly. Also a definition of quality risk was added to the list of definitions	Addressed
56	30	511-513	4		General comment	This is more a statement/description than a requirement. This applies also to other parts of the document.	Revise text.	Revised accordingly. Text was deleted.	Addressed
57	30	505	4.4.1		Editorial comment			Revised accordingly.	Addressed
58	30	514	4.4.2		Specific comment	I think this Clause should not contain the requirement related to "training" as the Training requirements are subject of further clauses.	Move this sentence to the Clause related to "training" -	Revised accordingly. Moved to 4.9.9.1	Addressed
59	30	522	4.4.3		Editorial comment	Correct designation from CENELEC 50625 to EN 50625 (to be changed throughout the whole document), even some parts of EN 50625 are published as EN and other as CLC/TS, because CENELEC is the acronym of the Standardization Organization	Replace CENELEC 50625 by EN 50625 (to be changed throughout the whole document)	Revised accordingly.	Addressed
60	30	506	e.g. 4.4.1		General comment	In various places where compliance with a CENELEC requirement is specified the reference is only partial. For example, in line 506 the clause and standard number need to be added.	Check in all places where an existing requirement is referred to that the reference is complete and the referencing method is the same in all places. Example in line 506 add "requirements in clause 4.2 of EN 50625-1 apply." at the end. Or in line 888-889 there is reference in the title to ISO IWA 19 but it seems that the reference to a specific clause or to the document in the text itself is missing. In line 1091 add "Requirements in clause 4.2 of EN 50625-1 and in clause 4.1.2 of TS 50625-4 apply".	Revised (partially). This task will be completed in V7.	Addressed

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61	31	538	4		Specific comment	We are wondering how progress on environmental and social performance can be monitored on a regular basis. This goes even beyond EN 50625 but is here restricted to CRM. If needed it should be a general requirement.	Revise or delete text.	Revised. Text improved. It makes reference to the Monitoring Plan (see example in Annex II)	Addressed
62	31	550	4			that is purpose built for CRM recycling..		Revised accordingly.	Addressed
63	31	550-551	4		Specific comment	This is not feasible for two reasons: (1) CRM recycling is in most cases not economically feasible and operators can therefore not be forced to recover CRMs and (2) devices often contain several CRM and there are thermodynamical limits to recover alle of them.	Revise text.	Revised accordingly. Sentence was deleted.	Addressed
64	31	530	4.4.4		Specific comment	Since in 527-529 it is already a requirement to have risk mitigation measures, this note can be deleted. The part of the sentence "to tackle identified risk" could be moved at the end of 529, i.e. "... CEWASTE certification to tackle identified risks."	Since in 527-529 it is already a requirement to have risk mitigation measures, this note can be deleted. The part of the sentence "to tackle identified risk" could be moved at the end of 529, i.e. "... CEWASTE certification to tackle identified risks."	Revised accordingly.	Addressed
65	31	539	4.5		Editorial comment	"critical risk factors and related responses at least for the risk points were the " I believe where is meant and not were		Revised accordingly.	Addressed
66	31	541	4.5		Editorial comment	A bracket is missing after disposal	add Bracket after disposal: "... disposal)."	Revised accordingly.	Addressed
67	32	569	4		Specific comment	What is the difference between "downstream monitoring" and "traceability requirements"?	We propose to merge the two chapters.	Clarified as follows. Traceability applies to operators upstream. Traceability complements downstream monitoring. They need to remain in separate clauses: while monitoring results are typically used for internal purposes, traceability results aim to be communicated to other stakeholders, eventually consumers, customers and interested economic operators.	Addressed
68	32	573	4		Specific comment	Is it anywhere explained in this report why these traceability requirements are only limited to batteries and PCBs ?		Clarified. This results a stakeholder consultation and agreement as explained in Notes to the Reader.	Addressed

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69	32	556-561	4		Specific comment	This is an unrealistic requirement since input data is usually not known and if it would have to be known this would encompass complex and expensive sampling and analytical work! The same is true for the output since most of the CRM can be found in numerous fractions.	Revise text.	Revised accordingly. Now it requires data on mass or UNIT, provided this is economically feasible. A provision text was added.	Addressed
70	32	570-571	4		Specific comment	Why restrict it to lead-acid batteries and Printed Circuit Boards?	Give an explanation or extend it to other CRM containing devices.	Clarified. This results a stakeholder consultation and agreement as explained in Notes to the Reader.	Addressed
71	32	560	4.5.1		Specific comment	It is not clear if the downstream information shall include the "treatment technology(ies)" related to next pre-treatment(s) only, or also related to the "final treatment"	Clearly define the applicability of the downstream requirements.	Revised accordingly.	Addressed
72	32	560	4.5.1		Editorial comment	"fractions, and the treatment technology(ies) applied in the next pre-treatment of final... " I believe or is meant and not of		Revised accordingly.	Addressed
73	33	599	4		General comment	Comment as under 23: Input and Output characterizations are tricky!	Revise text.	Revised accordingly. Now it requires data on mass or UNIT, provided this is economically feasible. A provision text was added.	Addressed
74	4	32	4.6			Can PCBs be sent to any facility or trader. Actually it is not always possible to get documentation of origin. This needs to be clarified.	Clarify	If not possible to get documentation from the operator delivering the PCBs then the material will not be traced; hence, the traceability requirement will not be fulfilled.	Addressed
75	33	592	4.6.2		Editorial comment	Delete the 2nd Note ("Note: Note: Based")		Revised accordingly.	Addressed
76	33	599-601	4.6.2.1		Specific comment	The defined mass balance model could be only possible in case if the original content of CRM in lead-acid batteries, printed circuit boards or their fractions is known. However, I am not really sure if it is possible to know the exact original content of CRM in each specific	Review the applicability of the requirement.	Revised accordingly. Now it requires data on mass or UNIT, provided this is economically feasible. A provision text was added.	Addressed
77	34	628-629-630			Specific comment	What about batteries that are considered non-compliant? Are they subject to treatment at the facility or not?	A solution should be proposed on how to treat batteries that are not accompanied by proper documentation	Revised accordingly. Without records concerned fractions are non-compliant with the due diligence requirements, hence, claims are not feasible.	Addressed
78	35	648	4		Specific comment	This is not a meaningful sentence.	Revise text.	Revised accordingly. Improved text.	Addressed
79	35	649	4			reports on collection quantity. These shall be maintained by		Revised accordingly. The reports part was moved to the umbrella part (4.7).	Addressed
80	35	657	4		Specific comment	Recycling and recovery rates (RRR) disregard CRMs since their quantity is not accounted for in RRR	Revise text.	Revised accordingly. Paragraph was deleted. The mentioning of recycling and recovery rates as established in Annex C of 50625-1 is mentioned later.	Addressed
81	35	648	4.7.1		Editorial comment	Designation to be changed from CENELEC 50625-4 to EN 50625-4 (see how it is written in line 650)	Designation to be changed from CENELEC 50625-4 to EN 50625-4 (see how it is written in line 650)	Revised accordingly.	Addressed
82	35	648-650	4.7.1		Editorial comment	There may be an error in the sentence (a missing word, or so) as it seems that the second part of the sentence does not make any sense.	Review the sentence.	Revised accordingly.	Addressed

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83	35	648-650	4.7.1		Editorial comment	"In addition to the required document in CENELEC 50625-4, collection and logistics operators shall have annual reports on collection quantity shall be maintained by collection points according to clause 6 EN 50625-4" Sentence not clear. Should collection and logistics operators have reports on collection of collection points? I doubt that collection points should maintain the reporting of collection and logistics operators but even then the formulation is not clear.		Revised accordingly.	Addressed
84	35	655	4.7.2		Specific comment	Documents showing compliance with legal requirements, including necessary permits.		Revised accordingly. This is mentioned in the umbrella text of 4.7. This is also already required by 50625-1	Addressed
85	36	669	4			records on AN annual basis		Revised accordingly.	Addressed
86	36	679	4			if these ARE		Revised accordingly.	Addressed
87	36	661-663	4				Move the 'documentation on special work procedures of processes performed for waste batteries, printed circuit boards, CRM containing components or fractions' to 637	Revised accordingly.	Addressed
88	36	679	4.7.2		Editorial comment	Replace CENELEC Standards with European Standards	Replace CENELEC Standards with European Standards	Revised accordingly.	Addressed
89	36	679	4.7.2		Editorial comment	"If these related to non-compliance " add are		Revised accordingly.	Addressed
90	36		4.7.3		Editorial comment	"If there is mercury present in lamps- fluorescent powders and of lead and cadmium in CRT- fluorescent powders, these fractions shall be labelled following the European Waste Catalogue - Commission Decision 2000/532/EC. The above-mentioned fluorescent powders as classified with the code 19.12.11*." Formulation improvement proposed		Revised accordingly.	Addressed
91	37	706	4		General comment		ISO/IWA 19 reference to CEWASTE should be rethought in general. Such a reference if justified should be made for the whole 50625 series, but this is out of scope of CEWASTE.	Revised. ISO IWA was deleted In the context of communication and awareness raising. In version 7.0 ISO IWA was kept as requirement mainly in one place (e.g. contractual aspects).	Addressed
92	37	688-690	4		Specific comment	This is more a description than a requirement.	Rethink structure and terms	Revised accordingly. Text was deleted.	Addressed
93	37	695	4.7.3		Specific comment	Basel Convention codes could be added if the standard addresses movements outside the European Union.		Revised: A reference (footnote) to the codes according to the Basel Convention was added.	Addressed
94	39	711	4	1		Stakeholder section , optional information: replace exploration with exploitation		Revised accordingly.	Addressed
95	39	711	4	1		Workers section: why from lack of capacity ? I would rather say "lack of required technical set-up and/or operational skills		Revised accordingly.	Addressed
96	39	711	4	1		Workers: add behind each CEWASTE the words " compliant CRM extraction"		Revised accordingly.	Addressed

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97	39	712	4	Table 1	Specific comment	In the line "Authorities ... that may be communicated": Is this really a "may be" or not a "shall be" because it is a legal requirement?	clarify	Revised accordingly.	Addressed
98	39	722	4		General comment	This is already covered by EN50625 (and has nothing to do with CRM recovery...)	Revise text.	Revised accordingly. Text deleted.	Addressed
99	39	711		Table 1	Editorial comment	about the authorities: that may be communicated reporting on legal compliance	about the authorities: that should be communicated reporting on legal compliance	Revised accordingly. It says now 'shall'	Addressed
100	40	741	4.9.1		Editorial comment	The text refers to two clauses from the EN standards - the third listed is not referred to in the text - "Refer to clause 4.2 of TS_50625-4 for collection points"	Add reference in the text if needed or erase bullet if irrelevant.	Revised accordingly. Reference was added.	Addressed
101	42	793	4.9.2.1		Specific comment	In the note it is written "... the treatment facility cannot exceed an 8-hour Threshold Limit Values (TLV)." Should the "cannot" be replaced with "shall not"?	clarify	Revised accordingly. It was replaced with 'shall'	Addressed
102	42	794-795	4.9.2.1		Specific comment	"Where a country imposes PELs lower than 8-hour, these lower values shall be respected for that country." I would refer to a stricter PEL. It is not straightforward if the formulation "PEL lower than 8 hours" refers to something stricter or not. If you are allowed an exposure of x over 8 hours than lower than 8 hours is for example that the same level is allowed over 4 hours which would mean that over 8 hours a double amount is tolerable. I think that we should only allow deviations from the requirements where it is towards something stricter and the current formulation is not clear for me in that respect.	Adapt formulation so that it is clear that stricter levels should be complied with or specify for which cases the levels specified in the document are to be seen as minimum levels to be complied with (Cd, Pb?) or erase.	Revised accordingly. Agree	Addressed
103	43	813	4.9.2.1		Specific comment	HEPA filteres cantine should also be mandatory for lead smelter		Revised accordingly.	Addressed
104	43	817	4.9.2.1		Specific comment	For lead smelters not only proper work wear is important, but also fresh work wear every day	Please add: For lead-acid battery recycling, clean work wear must be provided by the employer for each shift or day of work and should never be taken home for washing or cleaning by the employee	Revised accordingly.	Addressed
105	43	820	4.9.2.1		Specific comment	Ventilated masks should be mandatory for workers in lead smelters (as this allows them to speak with their mask one more easily and avoids violation of sound use)	Please add: Ventilated masks must be provided to all workers of lead smelters	Revised accordingly.	Addressed
106	43	828	4.9.2.1		Editorial comment	Missing clause number in the reference: "and .11 of EN 50625-2-2"	Correct the link.	Revised accordingly.	Addressed
107	45	865	4		Specific comment	It is written "... compounds VOC) shall be regularly (every three months) monitored." What does "every three months" mean? Is it a requirement or a recommended interval defining the meaning of "regularly?"	clarify	Revised accordingly.	Addressed

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Comment no.	Page	Line no.	Clause no.	Figure/ Table no.	Type of Comment	Comment / Issue	Proposed change	Response & remarks from project partners	Resolution
108	45	633	4.7		Editorial comment	"...established in clause 6 of EN 50625-1." Isin't a green reference to clause 6 of EN 50625-1 needed as well as the reference in the text? It could be added directly after the sentence or after the bullets.	Add "Refer to clause 6 of EN 50625-1" in green text in one of the two places suggested	Revised accordingly. Ref. added.	Addressed
109	45	859	4.9.2.1		Specific comment	WHO is not the source but recommend to introduce a testing policy	Remove the source, this is our own compilation based on recommendations by ILA	Revised accordingly. Source Deleted	Addressed
110	45	860	4.9.2.1		Specific comment	"Where no available national legislation or guidelines, all..." word missing		Revised accordingly. Deleted	Addressed
111	46	907	4		General comment	We wonder if the title "sustainability requirement" is correct since most of the document covers sustainability aspects	Rethink terms and structure of the report since sustainability requirements are prominently mentioned in the scope of the project. The same is true for traceability requirements which are hidden in chapter 4.6.	This is better clarified in Notes to the Reader in V7.0. The managerial requirements are 4.1-4.9; the sustainability requirements are in 4.10; and the traceability ones in 4.11.	Addressed
112	46	900	4.9.3		Editorial comment			Revised accordingly.	Addressed
113	46	891-894	4.9.3.1		Specific comment			Revised accordingly.	Addressed
114	47	921	4		General comment	The term "environmental protection" is outdated. It also does not address the real content which is more monitoring of environmental impacts or similar.	Revise title and rethink positioning in the report.	Revised accordingly. Now it is 'Env impacts control'	Addressed
115	47	931	4.10.2		Specific comment	"If limit values have been exceeded," Which limit values? If there is no reference then maybe refer to limit values specified in applicable legislation. This needs to be clear so that in the auditing it is clear if a specific level needs to be complied with or if it just needs to be checked that the facility applies the relevant legal requirements in its monitoring and environmental management system...		Revised accordingly.	Addressed
116	48	958	4.10.2.1		Editorial comment	The first sentence is just a "statement", there is no requirement, it seems unnecessary.	Remove the first sentence.	Revised accordingly.	Addressed
117	49	986-991	4			Please cite the original source for these stated thresholds..		Revised as per OekoInstitut's suggestion: Text replaced with: In the case of treatment and recycling of lithium-ion batteries, in the absence of national regulations, the guidelines for air emission limit values cited in Annex IV shall apply. Monitoring shall be based on daily averages. The frequency of the emission measurements is determined by the competent licensing authority for the plant.	Addressed
118	51	1015	5		General comment		Revise structure.	The structure of clause 5 was improved. 5.4 and 5.7 were merged; 5.9 was integrated in 5.12.	Addressed

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119	51	1010 - 1011	5		Specific comment	This description seems to us rather vague. What do you mean by "different flows" and why to extend it beyond CRM?	Revise text.	Revised accordingly. Now it refers to KCE and KCC.	Addressed
120	51	1018	5.1		Editorial comment	TYPO "This It".	Correct the TYPO.	Revised accordingly.	Addressed
121	51	1018	5.1		Editorial comment	Delete "This" in the sentence:		Revised accordingly.	Addressed
122	51	1018	5.1		Editorial comment		This excludes WEEE	Revised accordingly.	Addressed
123	52	1029	5		Specific comment		Include all WEEE in the figure and make distinction between KCE and the rest.	Partially Revised. The graphic has been improved and now it explains more clearly how KCE and KCC navigate through the clauses.	Addressed
124	53	1030	5.1.1.1	Figure 2	Specific comment	The Alkaline batteries are not mentioned at all (neither in scope or out of scope of CEWASTE).	The Alkaline batteries should be explained.	Clarified. NiMH are not within the scope. The revised diagram makes this explicit under "other batteries out of scope".	Addressed
125	53	1030	5.1.1.1	Figure 2	Specific comment	I looked at the diagrams and from my point of view they look good and well structured. - WEEE-flow: no changes from my side - Batteries: principally okay, just following remarks/questions: In the WEEE flow chart there is rightfully an extra step for pre-treatment (= dismantling and mechanical treatment of WEEE) this pre-treatment step is missing in the battery flow, which makes sense for the batteries contained in WEEE and for Pb-acid batteries from ELVs (no further dismantling of the battery needed). But in the case of Li-Ion or Ni-MH ELV-batteries we see usually an extra dismantling step of the (large) battery itself which often takes place at another location than the final (metallurgical) treatment or even at another company. So I propose to include an extra box between "sorting of batteries" and "delivery to a final treatment facility ...". This could first contain a decision square, e.g. "ELV Li-Ion or Ni-MH-battery?". In case of "no" it can straight go into the final treatment		Revised accordingly. Your points were correct.	Addressed
126	53	1030	5.1.1.1	Figure 2	Specific comment	It is not clear how the Li-Ion batteries shall be sorted and treated - there is a note "(α)", however, not additional comments or explanation.	Explain details related to Li-Ion batteries.	Revised by Umicore, EERA and Oeko. The diagram has now no reference to "(α)".	Addressed
127	54	1056	5		Specific comment	Chapter number is wrong	correct	Revised accordingly. E.g. 5.1.2 was missing.	Addressed
128	54	1034	5.1.1.1		Specific comment	The terms "CDD" and "ODD" are not explained.	Explain the abbreviations "CDD" and "ODD".	Revised accordingly. ODD was left (optical disk drive)	Addressed
129	54	1037	5.1.1.1		Specific comment	NiMH no longer in scope	please delete	Revised accordingly.	Addressed
130	54	1041 - 1055	5.1.1.2		Specific comment	See last comment. we need to consider how these requirements are addressed, i.e., how the formulation ensures audibility.	Consider reformulation to ensure audibility. For example - the entity responsible for collection of WEEE and batteries from collection points shall ensure that the collection point is compliant with...	Revised accordingly. Agree	Addressed

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Comment no.	Page	Line no.	Clause no.	Figure/ Table no.	Type of Comment	Comment / Issue	Proposed change	Response & remarks from project partners	Resolution
131	54	1085			Specific comment	"Removal" as defined in the WEEE Directive does not exclude shredding and subsequent mechanical separation, which we do not want to have here.	Exchange "removal" by "separation"	The term removal has been replaced in several places. Another reading of the whole text by a consortium member would help.	Addressed
132	55	1078-1080	5		Specific comment	Is the term "industrial batteries" clearly defined? What do you include/exclude? What are semi-industrial batteries? Why are batteries from e-bikes and scooters industrial batteries when they come from individual consumers?	adjust/extend definitions	Revised accordingly. A footnote was added clarifying: "according to the EU Batteries Directive (Directive 2006/66/EC), SLI (starting, lighting, ignition) batteries are defined as automotive batteries, whereas hybrid and electric vehicle batteries are categorised as industrial batteries."	Addressed
133	55	1079	5.1.2		Editorial comment	Incomplete sentence. Proposal: "... batteries USED in e-bikes and e-scooters."	Incomplete sentence. Proposal: "... batteries USED in e-bikes and e-scooters."	Revised accordingly. Text deleted.	Addressed
134	56	1089-1091	5		Specific comment	This is a general condition applicable to any plant, certainly regulated already in numerous directives...	Revise text.	Revised accordingly.	Addressed
135	57	1127-1128	5		General comment		Add a separate general chapter on legal compliance and don't detail that in all subchapters.	Section 4.2 on legal requirements has only one line to re-stating the message that legal requirements shall be complied with. There are no other legal requirements indicated along the document except as suggestions (e.g. EU directives or international recommendations) in case countries do not have legal requirements.	Addressed
136	57	1118	5.2.4.		Specific comment	What do you mean with "battery removal"? Fire detection and protection should be present in the treatment facility, general requirement?		Revised accordingly. The 'fire detection and protection' part is mentioned in 4.9.2.	Addressed
137	57					The figure is misleading since it documents activities which are not part of collection and logistics, and also SHOULD not be part of it.	Delete figure	Figure was revised and moved under clause 5.	Addressed
138	58	1139-1142	5		General comment		Delete statement.	Revised accordingly.	Addressed
139	59	1169	5.4.2		Editorial comment	The sentence "Type 3 shall be separated from batteries with complete cases." is the same as in the following paragraph.	The repeating sentence shall be deleted.	Revised accordingly.	Addressed
140	59	1171	5.4.2		Specific comment	Why only one specific brand product "Pyro-Bubbles" is mentioned? There are also other products suitable. Such "brand" preference shall be avoided in the Standard.	Replace the specific product name "Pyro-Bubbles" by more general recommendation (or mention the specific product in a note only).	Revised accordingly. The mentioning of a brand name was deleted.	Addressed
141	5	1162	5.4.2			There is a requirement related to batteries which would require the operators to separate the batteries into three different groups: 1) not-damaged batteries, 2) damaged batteries which have an inner shortcut and 3) damaged batteries with broken casing. The question was how to distinguish that a battery has an inner short cut?	Revise	Agree.	Addressed

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142	59	1169-1170	5.4.2		Editorial comment	"Type 3 shall be separated from batteries with complete cases. Damaged batteries (type 3) shall be separated from batteries with complete cases." these sentences are the same in content - one should be erased.	Erase the first sentence (line 1169)	Revised accordingly.	Addressed
143	60	1199	5			I would mention that contacts need to be taped ?		Revised accordingly.	Addressed
144	60	1197	5.5.1		Specific comment	The note no. 6) links to one specific commercial provider of plastic boxes. Why just this one? There are many of such providers of UN approved boxes.	A more general link to UN approved boxes shall be made.	Revised accordingly.	Addressed
145	60	1200	5.5.2		Specific comment	The term "excessive heat" is not specified (e.g. specific temperature that shall not be exceeded).	Specify what does it mean "excessive heat".	Revised and clarified accordingly. The batteries electrolytes usually contains flammable organic solvents some of which are volatile at modest temperatures (below 100 °C). 60-100C is already a dangerous heat level that can increase fire risks.	Addressed
146	60	1203	5.5.2		Specific comment	NiMH no longer in scope	please delet	Revised. NiMH deleted.	Addressed
147	60	1200	5.5.2.		Specific comment	Add specific safety measures? For example open contacts need to be taped off, loose wires need to be taped to the cells/batteries, add sand,... Measures for early detection of fire, specific fire fighting equipment for Li-fires? Measures should be depended on the type of Li batteries (soft shell, charged/uncharged batteries, loose contacts,...) and state of health of batteries stored?		Revised accordingly. The indications for safe storage where added in 5.5.2 and the one for fire prevention&protection were mentioned earlier in clause 4.9.2 for all KCE.	Addressed
148	61	1229	5.6		Specific comment	Reference to European directive on GHS, as needed, could be added Regulation (EC) No 1272/2008, in case the materials extracted are travelling as products.		Revised accordingly. Reference (EC) No 1272/2008 was added	Addressed
149	61	1240	5.6.3.1		Specific comment	Shipment of lead-acid waste batteries across borders are subject to the requirements of the Basel Convention		Revised accordingly.	Addressed
150	61	1247	5.6.3.1		Editorial comment	Spelling mistake: ADN (not AND)	see left	Revised accordingly.	Addressed
151	62	1265-1266	5		General comment	Why giving clear instructions to the public for CRM containing devices? Usually separation is done for hazardousness or because devices later enter different treatment technologies.	Rethink need of this statement.	Revised. Text is now more aligned with your comment.	Addressed
152	62	1250	5.6.3.1		Specific comment	as previously noted reference to the Basel Convention is necessary if transboundary movements occur outside the EU.		Revised accordingly. A mentioning to the Basel Convention was added for waste lead-acid batteries.	Addressed
153	63	1280	5			in case of CFL lamps also need to know if arriving crushed or not		Revised accordingly.	Addressed
154	63	1299	5.7.2		Specific comment	LiPF6 is not a volatile material	Delete LiPF6	Revised accordingly.	Addressed

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155	63	1272 - 1315	5.7.2		Specific comment	Why such complicated and complex agreement is required? What is the benefit of such an agreement. It looks like a high level of bureaucracy without added value for recycling or de-pollution.	Review if such complex and complicated agreement is really necessary for all the mentioned materials.	Revised accordingly. This will only apply to hazardous CRM components such as waste batteries and fluorescent powders.	Addressed
156	63	1296 - 1300	5.7.2		Specific comment	It is not clear what types of "Acceptance levels" are defined. Acceptance levels where? (in the fractions, in the air? If in the fractions, how it can checked e.g. in batteries?, or in Printed circuit boards?	Clarify the "acceptance levels" – where to analyse and the reasoning.	Revised.	Addressed
157	63	1279	5.7.2.		Specific comment	add applicable waste classification codes (EWC list, Basel code,...)?	applicable waste classification codes (EWC list, Basel code	Revised accordingly.	Addressed
158	64	1324	5			Add: avoid mixing CEWASTE compliant CRM sources with unspecified ones		Revised accordingly.	Addressed
159	64	1328	5		General comment	Most of the mentioned devices are already separated. I wonder if more separation at this stage is useful. Other criteria (as mentioned above) should be considered equally when sorting devices.	See also general comment on top.	In principle we agree. This clause comes later although sorting might be already happening while receiving. This is better reflected in the diagram.	Addressed
160	64	1330 and 1331	5.8		Specific comment	This requirements to sort (engine, compressor) may be very misleading as it can be understood that the engines and compressors (from TEEE) shall be removed and sorted separately which contrary to de-pollution requirements.	Delete the text in brackets "(engine, compressor)".	Revised. Text was improved.	Addressed
161	66	1347	5.8.1		Specific comment	NiMH no longer in scope	please delet	Revised accordingly.	Addressed
162	66	1348	5.8.1		Specific comment	the guidelines deal with lead-acid batteries only, not waste batteries in general; specification necessary		Revised accordingly.	Addressed
163	66	1354	5.8.2			Sorting magnets from electric engines (EV-PHEV) is a complex (to a quase-impossible task, for some models). Most of OEM use IPM (Interior permanent motor) rather than SPM (surface permanent motor). In some IPM magnets are glued and fragmented.		This comment relates to the 'Removal' clause. In this case of complex removal please also refer to procedures to be published in the CEWASTE Manual.	Addressed
164	66	1356	5.8.2			Non NdFeB magnets can be hard to be detected if coated.		Clarified in the text.	Addressed
165	66	1356	5.8.2		Editorial comment	The text adde by error "Figure 3: Sorting at collection points and facilities (adapted from Fig.1 of TS 50625-4)"	More the text to the correct row no. 1344.	Revised accordingly.	Addressed
166	66		5.8.2			Figure 3 is missing		Revised accordingly. This was a formatting issue.	Addressed
167	66	1365	5.9		Specific comment	Why there is a reference to the clause 5.10 of EN 50625-1? This clause is not related to de-pollution, however, it is related to "Recovery and disposal of fractions".	Make a reference to the relevant clause of EN 50625-1.	Revised accordingly.	Addressed
168	67	1371	5.9			"Refer to clause 5.5 and 5.10 of EN 50625-1" Reference does not match the clauses mentioned in the lines above.	Check which is correct and revise.	Revised accordingly.	Addressed

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169	68	1413	5.12		Specific comment	final disposal? Disposal can be defined as including also other operations if it is not final disposal.		Revised accordingly. 'Disposal' is now the term used.	Addressed
170	69	1445	5		General comment	Why is here no special treatment required? At present there is no recovery of REE, but you want to foster REE recovery from fluorescent powders... (see 5.12.2)	Rethink.	PENDING. Refer to En 50625 2.2 covers the treatment of CRT equipment	Addressed
171	70	1461	5.12.3.1		specific comment	In order to increase lead and Sb recovery battery breaking should be mandatory (already done in practice)	Please add: Batteries shall be broken before they enter the smelter.	Revised accordingly.	Addressed
172	71	1495	5.12.3.1		Specific comment	not emissions must be monitored, but sufficient suction of the fume hood	please change sentence to: The furnace shall be ventilated properly and suction of the fume hood shall be monitored on a daily basis.	Revised accordingly.	Addressed
173	71	1499	5.12.3.1		Specific comment	please correct: process waste - not waste process	see left	Revised accordingly.	Addressed
174	71	1499	5.12.3.1		Specific comment	because the containers with lead-dust can be disposed of at other facilities (see section above this section), this requirement would be contradicting. Please adjust accordingly: In normal cases all lead-containing process waste shall be recycled within the facility with a view to prevent emissions of lead-compounds into the environment and to minimize process waste for disposal . If this is not possible, a written agreement for the environmentally sound disposal with a suitable disposal facility shall document the disposal of process waste.	Replace with: In normal cases all lead-containing process waste shall be recycled within the facility with a view to prevent emissions of lead-compounds into the environment and to minimize process waste for disposal . If this is not possible, a written agreement for the environmentally sound disposal with a suitable disposal facility shall document the disposal of process waste.	Revised accordingly.	Addressed
175	73	1535	5.12.3.2.		Specific comment	add link to Battery Directive recycling targets, calculation method and reporting obligation (Council Regulation 493/2012)?		Revised accordingly. This was added in 4.7.2 on documentation.	Addressed
176	74	1534	5.12			Magnet-to-Magnet (MtM) recycling is not yet taken into account in this part of the requirements, should be added.	Add the below text: <ul style="list-style-type: none"> in the case of REE recycling from NdFeB-magnets recycling, the mass of CRM (rare earth elements in magnets) recycled, or. In the case of magnet-to-magnet (MtM) recycling the mass of the NdFeB-magnets produced from these waste magnets and sold. 	Revised. Addressed in V7 - Clause 5.12 - two last bullet points	Addressed
177	75	1575	6.1.1.		Specific comment	Why there is an reference to clause "4.101" of 50625-3-4 only? In this clause, there are not any requirements, it is just an introduction for the de-pollution monitoring. The de-pollution monitoring requirements are defined in the whole clause 4.	Correct the relevant de-pollution reference for TEE to the clause 4 of 50625-3-4.	Revised accordingly.	Addressed

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178	78	1638	7		Specific comment	Add reference to Basel Technical guidelines provided before (on e-waste and on lead acid batteries) as well as the classification and labelling EU regulation and the Basel Convention in case shipments are transboundary movements outside the EU		These is a relevant reference and had been added to the 'Normative References' part, and not here.	Addressed
179	80	1694	Annex I	Table I	Specific comment	Lead-acid batteries mainly come from ELV - please change Waste type to ELVs & stationary power storage & uninterrupted power supply equipment	see left	Revised accordingly.	Addressed
180	80	1694	Annex I	Table I	Specific comment	NiMH batteries are no longer targeted by CEWASTE Standard - please remove	see left	Revised accordingly.	Addressed
181	81	1715	Annex II		Editorial comment	There is no ISO 14014 (no reference in the document as well). Dou you mean ISO 14001, which is from 2015?	clarify	Revised accordingly.	Addressed
182	81	1715	Annex II		Editorial comment	14001		Revised accordingly.	Addressed
183	84	1818 (V7)	5.12.4			Final treatment operators shall provide the latest recycling performance assessment to CEWASTE-certified pre-treatment operators from whom they receive NdFeB-magnets. Note: Example: 1000 tons magnets as input and 850 tons magnets as output in case of MtM recycling	What an appropriate example for PCBs would be?	Examples were added in V8.0	Addressed
184	88	1844	Annex IV			Considerations on how these batteries are classified (when hazardous or non hazardous) could be more clearly stated in the text and in this annex.		Revised. It is mentioned in the 'Introduction' (see text: Out of the four KCC defined, two are intrinsically hazardous components: fluorescent powders and lead-acid waste batteries) and in the Technical Requirements. Codes from the Basel Convention are given to these. Lithium-ion batteries are not hazardous.	Addressed
185	90	1885	Annex IV		Specific comment		CO	Revised accordingly.	Addressed
186	91	1891-1893	Annex IV		Specific comment		Please replace this section by this alternative text: Batteries which are classified as critical (e.g. mechanically damaged, inflated by heating, high risk of short circuits) during the incoming inspection of the recycling plant must be immediately put into a salt or alkaline bath for a longer period of time in order to prevent short circuits or thermal reactions. This solution will finally become waste water containing F-, PO43-, and heavy metals of Ni, Co, Mn. This wastewater has to be treated properly to remove these hazardous substances.	Revised accordingly.	Addressed

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187	94	2004	Annex IV		Specific comment	Additional requirement	Please add: The yield of cobalt from lithium-ion battery recycling processes shall be at least 90%. Ambitious yields shall also be sought for nickel, copper and lithium. In any case, yield here means the provision of cobalt compounds etc. in battery quality or suitable for an economically comparable application and needs to refer to the metals content in the battery cells, i.e. reflecting the entire recycling process chain.	Revised accordingly. However, the last sentence was not clear: '...reflecting the entire recycling process chain'?	Addressed
188	96	2025	Annex V	Table V-2	Specific comment	Please add the RID in the left column of the table: Regulations concerning the International Carriage of Dangerous Goods by Rail (RID). 2019	see left	Revised accordingly.	Addressed
189	97	2030	Annex V	Table V-3	Specific comment	This table applies to Lithium-Ion batteries, please move respectively	see left	Revised accordingly.	Addressed
190	97	2030	ANNEX V	Table V-3	General comment	The poThe annex is called "ANNEX V – FINAL TREATMENT OF LEAD-ACID BATTERIES". That is why those requirements for Li-Ion batteries defined in the Table V-3 are not relevant for this clause.	The Table V-3 shall be either removed at all or moved to a separate clause relevant for Li-Ion batteries. int no. 8 is incorrectly named. It shall be "point" instead of no. 8.	Revised accordingly. Moved to Annex IV.	Addressed
191	99	2053	Annex V		Specific comment	The paragraph is listed twice. Also this paragraph was meant to be in the requirements directly.	please remove the paragraph from line 2039 - 2052 to chapter 4.9.2.1 and insert after table 2	Revised accordingly.	Addressed
192	100	2074	Annex V		Specific comment	The conventional hydrometallurgical routes for the recovery of rare earths from End-of-Life permanent magnets have a high environmental impact due to inefficient use of chemicals, whereas the conventional pyrometallurgical routes for the production of magnet master alloys are energy-inefficient.	Several studies, included in European Rare Earth Competency Network (ERECON), have demonstrated that Hydrogen Decreptation method is current the best option to recycle NdFeB magnets from the economic to environmental point of view (LCA, LCC)	The Hydrogen Decreptation method is now considered as an option in the Annex.	Addressed
193	-	1694	Annex I		General comment		Adjust baseline report or make up the missing piece in this report.	Table revised and explanation added.	Addressed
194	-	-			General comment	The report is missing an integral view on WEEE management, disregards to some extent consideration of today's practices in WEEE companies and relevance of other aspects (i.e. for sorting devices hazardousness is more important than sorting along KCE devices).	Major revision of the report.	An elaborated Table with the KCE, KCC and CRM concerned is provided in Annex 1. This reflects today's practices. Fig. 1 guides on steps when hazardous substances/fractions/components exist. This leads to depollution.	Addressed
195	-	-			General comment	Some recovery options are mentioned but the text does not consequently define the needed technical requirements (CRT, lead-acid batteries), see also comments No. 3 and 7.	Major revision of the report.	In light of the four KCC (waste batteries, magnets, PCBs and fluorescent powders) we will produce a table (steps vs gaps) and confirm if existing technical requirements in CEWASTE are sufficient. If not, we will address them in the final Version.	Addressed

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Comment no.	Page	Line no.	Clause no.	Figure/ Table no.	Type of Comment	Comment / Issue	Proposed change	Response & remarks from project partners	Resolution
196	-	-			General comment	Structure of the document is confusing.	Major revision of the structure of the report. A visualization of the structure of the report at the very beginning would be extremely helpful.	The structure was improved (few clauses were merged). This is explained in notes to the reader. A visualization of technical requirements is in Fig. 1. A High level fig with the structure was also added in the Notes to the Reader.	Addressed
197	30 (V6)		4			in the case of preparing for re-use, the correct reference is clause 4.1.5 of CLC/TS 50625-4:2017 (instead of the generic "4.1").	Change the reference number from 4.1 to 4.1.5 of CLC/TS 50625-4:2017	Revised.	Addressed
198	34 (V6)		4.5.1			I don't understand the requirement. Does this apply to final treatment operators? Does this apply to treatment operators and they must monitor the final treatment operators (their downstream)? What are the cewaste requirements referred to? Are they cewaste requirements applicable to final treatment?		Clarified. Following text was added: This covers the monitoring in which each party of the value chain is required to trace and document the compliance of the processing of waste and its streams by acceptors of the waste fractions it processes.	Addressed
199	36-37		4.7.3		Specific comment	this section requires among other the coding of the fractions and also specifies the hazardous labels at the end. I assume in that sense that the requirement should be both to classify and label the fractions with the correct codes and labeling. currently on the coding is mentioned and the labels relevance is not specifically referred to. In this respect, line 696 refers to the labels legend. If I am not mistaken, the label that is to be affixed to the fraction (or to products) needs to contain various details which would include the codes and the pictograms. The two squares are not the labels per se but a part that needs to be included within them. Maybe refer to this as "Pictograms of corrosive and health hazard codes that need to be included in fraction labeling".	Change formulation so that it is clear that labeling of relevant fractions is to include both codes and pictograms.	Revised accordingly.	addressed
200	40-45	726-886	4		General comment	This is a quite prominent part of the document and it goes quite into details and we ask ourselves if this should be so much in the foreground as long as - to our understanding - more relevant parts are missing. The effect is also that the rest gets a bit lost.	Rethink inclusion and where to put it.	Improved in V7. First note that most of missing parts are now covered in version 7.0. Proposal to address your comment is to split it into two different clauses: one clause for H&S and another clause for PM/Competences&Training. Proposal will be addressed in V8 as we did not want to disorganize the numbering of clauses in V7.0.	Addressed
201	70-71	1460-1501	5		General comment	There is no focus on Sb recovery which is defined as CRM to be recovered from lead acid batteries but it is indicated as economically viable in the table in the Annex.	Rethink.	Yes, now it is addressed. For the final treatment of lead-acid batteries their breaking is mandatory. By doing this, Sb will be released, hence, this becomes focus.	Addressed

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202	General				General comment	In general, very often the reference to the EN 50625 contains “ _ ” instead of “space” – e.g. EN_50625.	The “space” shall be used instead of “ _ ”.	Revised accordingly.	Addressed
203			4.7			you probably mean sub-contractors working on the premises of the facility covered by the audit? If so, please rephrase your requirement so that we can rephrase our question. If not, I really doubt any company keeps records of the activities that are not under its responsibility / premises...		Revised	Addressed
204			5			the order of sub-clauses in chapter 5 is not always logical. This can also be seen in the flow charts. For example why should in the general flow chart, clauses 5.7 or 5.8 be located before clauses 5.6 or 5.4?	Revise order	In V7 move 5.7 was moved to 5.4. 5.7 is empty	Addressed
205			4.7.2			I don't see how having an insurance policy can be a requirement that serves the CEWASTE goals. All insurance companies specify what is covered. What is the requirement to the operator? Do you want them to cover some specific issues or do you want them to have an insurance?		Revised	Addressed
206			5.12.1			If you refer to clause 5.10.2 of EN 50625-2-2: please add in the title 5.12.1 also flat display panel equipment. Otherwise remove reference to the above mentioned clause.		Revised. clause 5.10.1 on CRT was added. FPD are not in the scope of CEWASTE so 5.10.2 does not correspond.	Addressed
207			5.12.2			This text in the CEWASTE standard is informative and describes possible processes. The part on best available technology has been added without consultation and is wrong. Should be removed in the standard.		Revised: Note was moved to the Annex.	Addressed
208			5.6.2			This clause only applies to collection operators but the title refers to transfer between operators (implies also Logistics).		Revised. This covers the transfer from collection and logistic operators to treatment operators. This is now clarified in clause 5.6.2.	Addressed
209			5.7.1 & 5.7.2			Why the need to separate clauses 5.7.1 and 5.7.2? Aren't the requirements essentially the same, with specificities for printed circuit boards and waste batteries?		By merging clause 5.7 with 5.4 and simplifying some text, this was probably addressed. See revised version	Addressed
210		341	3		General comment	Must read secondary PARTY based ?		Revised accordingly.	Addressed
211		342	3			add "for example" - because it's a generic term applicable to other CRM containing materials an waste types as well...		Revised accordingly.	Addressed
212		363	3			involved in "any aspect" of.....		Revised accordingly.	Addressed
213		406	3		which ensure..		Revised accordingly.	Addressed
214		425	4				after 'waste fractions' add ...'in particular focusing on activities with highest potential of improving CRM recovery'	Revised accordingly.	Addressed

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215		453	4				write 'a management, monitoring and evaluation plan (MM&E. See example in Annex B)' instead of 'plan'	Revised accordingly.	Addressed
216		592	4			word "note" is twice		Revised accordingly.	Addressed
217		924	4				write 'a management, monitoring and evaluation plan (MM&E. See example in Annex B)' instead of 'an environmental management plan'	Revised accordingly.	Addressed
218		995	4			Emission controls (in addition.....) are not		Revised accordingly.	Addressed
219		467-470	4				Can be moved to documentation.	Revised accordingly.	Addressed
220		483-484	4				add...including those related to legal and other requirements (identification, monitoring, etc.)	Revised accordingly.	Addressed
221			4			n Clause 4 (the Management System part) there is a kind of fragmentation. We have encountered that when working on the Audit checklist. One example: The issue of training is treated in several sub-clauses. If I would be the one responsible for designing a training program for my staff I would have to search through the whole clause 4 in order to identify what needs to be addressed in the training. Do you see my point? But this is a not problem. We can deal with that after the online consultation.		Revised extensively in clause 4.	Addressed
222			4.9.2.1			This only applies to lamps, CRTs and flat panel displays containing waste but why not require this from all operators? OK?		Revised. In V7, "lamps, CRTs and flat panel displays containing waste" is replaced with "KCC."	Addressed
223			5			CEWASTE could maybe include technical requirements for the sampling of received (input) materials by recycling companies at final treatment. This is standard procedure for all smelters;		For sampling input materials, there are examples on how these are recorded (nmass inputs) in Section 4.7.2. This fulfils the requirements. Clause 6 on monitoring depollution includes sampling requirements for lamps, CRT, batteries, and PCBs.	Addressed
224			5			End-of-recycling is not a legal term. We did not use it in the document.		Term was deleted	Addressed
225			5			High value application of the residual slag remains challenging.		This is out of the scope of CEWASTE. It is recommended to deliver wastes to proper further treatment options (see general diagram flow)	Addressed
226			5			To maximise CRM recovery as resource-efficient as possible (minimising energy, water and chemical use) a combination of pyro- and hydrometallurgy is necessary.		We are not focusing on metallurgical processing for PCBs which is already state-of-the-art (e.g. Umicore).	Addressed

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227		1134	5.1.1.1			I think it is good to assume that pre-treatment operators might also receive magnets, and it is not necessary to specify the various types of electrical vehicles	Replace by "magnets from electrical engines/electrical engines from all types of electrical vehicles"	Revised. Addressed in V7 - clause 5.1.1.1 last bullet point: this text is added: "Eventually, magnets (KCC) removed from KCE are also received at collection points or facilities"	Addressed
228			5.1.1.1 & 5.8			for section 5.1.1, we identified an overlapping with section 5.8. There is a difference between Separated collection and Sorting. The wording along the document for this terms is ambiguous since sometimes the requirement detail that the waste shall be either "sorted"(5.1.1.1; 5.8) , "sorted separately" (5.8) or "collected separately" (5.1.2.3). Considering that both sections provide the list of key CRM equipment (KCEs) we consider that, unless section 5.1.1.1 refers exclusively to separated collection (physical), then the requirements in this section are already covered by section 5.8 and the first one could be deleted. Requirements in both sections apply to collection points, collection facilities and logistics facilities, so in that sense there is no need to keep section 5.1.1.1 If this section was to be kept, the term CRM related streams in the title of 5.1.1.1 should be revised because is ambiguous and is finally referring to KCEs (Annex I) which is the term mostly used along the document. The title could be modified to: WEEE COLLECTED IN		Revised. I added the distinction between 'separate collection' and 'sorting' in the umbrella part of 5.1. Very helpful. That should clarify the distinction between 5.1.1.1 and 5.8 See text below: Separate collection – different to sorting - takes place at the collection stage in either both, collection facilities or collection points and shall allow the ones bringing their wastes to dispose them of in different waste streams e.g. in different containers. See details in 5.1.1.1. Sorting occurs after separate collection and bases on procedures for carefully handling by trained personnel of the WEEE and waste batteries collected. See details in 5.8. In this version (V6) I decided to keep 5.1.1.1. I am happy to discuss with you later the possibility to merge 5.1.1.1 with 5.8. if this is more convenient. I kept the list of the key CRM	Addressed
229		1501	5.11			Typo	NdFeB instead of NffeB	Revised	Addressed
230		1500 et sqq.	5.11			MtM-recycling not taken into account, needs to be differentiated from REE recycling from magnets	Add that this documentation is only necessary for recycling of REE from NdFeB-magnets (option A of final treatment in attached Working Document), and that it is not required in case of MtM-recycling (option B)	Revised and addressed.	Addressed
231		1509	5.12			Following the definitions of "recovery" and "recycling" in the waste framework directive (the WEEE Directive references this directive), "recycling" is the more specific term; this approach was decided some months ago and confirmed by the AB members.	Exchange "recovery" by "recycling"	This was revised one by one and has been addressed.	Addressed
232		1534	5.12			"Considering that NdFeB-magnets recycling options are not yet commercially available..." does not make sense in this context. The point is that there is little experience about the performance so that we ask for periodical performance assessments to make treatment operators keeping or updating to the state of the art.	Replace by "Since representative state-of-the art recycling performance data for rare earth element recycling from NdFeB-magnets are not yet available..."	Revised. Addressed. The revised note is in 'Removal' clause.	Addressed

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233			5.12.4			Magnet-to-Magnet (MtM) recycling (final treatment) is missing in the document, should be added.	<p>Repace text of the clause by this text: NdFeB magnets shall be treated according to Option A: To recycle the REEs contained, or Option B: To produce new NdFeB-magnets from the waste magnets (magnet to magnet (MtM) recycling). The recycling plant and its operations shall comply with the applicable EU environmental, health and safety regulations or other regulations that are at least equivalent to these regulations. Documentation Option A (REE recycling): As evidence of recycling performance, the final treatment operator shall document the mass of processed NdFeB-magnets and the mass of REEs recycled from the processed NdFeB-magnets (mass calculated as elemental rare earth elements as sum of all recycled REEs). The recycling performance</p>	Revised. Addressed in V7 - Clause 5.12.4 - A more complete text is added in this clause.	Addressed
234			5.4 and 5.7			In clauses 5.4 and 5.7: what is the difference between "receiving" and "acceptance"? Or if they are different, maybe it is better to either combine them in one clause or move them next to each other. This will also solve the issue with the flow chart.	Revise	Receiving is used in a more general context and acceptance when it is about proving (againg requirements) that a facility is now responsible for what it accepted (pls. Check text example in 50625-1)	Addressed
235		1453 - 1455	5.8.2			See above comment	For magnet fractions received from pre-treatment operators not working according to the CEWASTE requirements, final treatment operators shall separate non-NdFeB-magnets from NdFeB-magnet fractions unless it is ensured that the final treatment of the magnets tolerates non-NdFeB-magnet impurities without losses of recycling performance	Revised. addressed in V7 - clause 5.8.2, last paragraph was revised.	Addressed
236			5.8.2			As it is now, it means sorting out NdFeB-magnets from the magnet fraction, which would result in sorting out the bigger part of magnets from the smaller part of the fraction since we assume that the magnets are only separated from devices with high probablity that NdFeB-magnets are used.	Pre-treatment operators shall sort out non-NdFeB-magnets accidentally separated from household appliances from NdFeB-magnet fractions unless it is ensured that the final treatment of the magnets tolerates non-NdFeB-magnet impurities without losses of recycling performance.	Revised. addressed in V7 - clause 5.8.2, last paragraph was revised.	Addressed
237		1734 et sq.	6.1.3			The clause references section 5.2.5 (receptacles), which is, however, crossed out.		Revised. This was kept.	Addressed

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238			Annex I			Feasibility of separation of the waste based on the components indicated in the KCE list. Esther thinks that this is indeed an ideal case and we will see during the pilots how realistic or challenging this might be for the operators.	Revise	Agree.	Addressed
239			Annex I			The list should be aligned to the EU list. E.g. Type 3 or category 3?	Revise	Annex I revised	Addressed
240			Annex II				add: ..indicators and targets will be defined case by case	Revised accordingly.	Addressed
241		2053 - 2066	ANNEX V		Editorial comment	The whole paragraph is repeating.	Delete the repeating paragraph.	Revised accordingly. Most of the text was moved to 4.9.2 on health issues.	Addressed
242		2166	Annex VI			"The process to be recommended is to be confirmed and further developed. A diagram flow is to be added"	Delete these two sentences, or only the first one. I think recommending processes is nothing that should be done neither in a standard nor in ist annexes. We can list them, or, if viable, set up emission and yield requirements instead, but this would require knowledge about this process for industrial scales, which is not available.	Revised.	Addressed
243		1995	ANNEXIV		Under the heading 'final products'		The yield of cobalt from lithium-ion battery recycling processes shall be at least 90%. Ambitious yields shall also be sought for nickel, copper and lithium. In any case, yield here means the provision of cobalt compounds etc. in battery quality or suitable for an economically comparable application and needs to refer to the metals content in the battery cells, i.e. reflecting the entire recycling process chain.	Revised accordingly.	Addressed
244			Definitions			Difference between removal and separation?	Add definitions	Revised. Definitions added.	Addressed
245			General			Why NiMH batteries have not been addressed in the CEWASTE requirements?	Clarify	Because of the decreasing market relevance.	Addressed
246			General			"Material passports" would facilitate sorting and dismantling to effectively remove key CRM components.		Due diligence is now the traceability approach proposed which can lead to material passports in future but too early now.	Addressed
247			Intro			The aim of the CEWASTE requirements is to add to the current-state-of-the-art of recycling.	Clarify in the intro how this is being fulfilled.	The aim of CEWASTE is to increase CRM recovery and improve recycling on gaps identified which is improving the state-of-the art	Addressed
248			Sampling			Does every sample need to be analyzed? This is not clarified.	Not clear	For each KCC there is requirements in Section 4 and Section 6 on what needs to be sampled (depending on the aims: for occupational health or depollution related aims)	Addressed
249		1126				What is the meaning of "shall be collected into streams"? This term is not defined or generally understandable.	Replace by "shall be collected separately"?	Revised. Addressed in V7 - Clause 5.1.1.1 first paragraph	Addressed

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250		V7				Revise de EN references in clause 6		Section 6 revised	Addressed
251		V7				Revise de EN references in Fig 1		Section 6 revised	Addressed
252						Final treatment shall occur in facilities that have been audited and not in facilities compliant with CEWASTE requirements.	Revise, as this is more realistic.	Final treatment shall occur in facilities that a minimum undergo CEWASTE audits. Compliance is not required at this stage.	Addressed
253						What is the purpose of knowing the inout and out of materials in a process? To see if the process is balanced? Or to check max recovery? Or to check min loss? Or check recycling rates?	Clarify	In order to understand the 'recycling performance'	Addressed
254					Editorial comment		Only operator instead of 'operator and facilities'	Revised accordingly.	Addressed
255						Quality of specific fractions is something operators might be willing to provide. If so, how the data should look like for the purposes of CEWASTE?	Clarify	See example of quality goals in the Annex II. Each facility defines its own the quality goals of input and output materials. They will follow minimum requirements such as from standards, clients, regulations	Addressed
256	-	-			General comment	We miss a clear framework of technical requirements for optimized CRM recovery: What are the basic technical conditions which foster a high recovery of CRM in CRM containing devices?	Major revision of the report.	The purpose and structure' part has been expanded and aiming at clarifying the basic technical conditions, Principles are included (see notes to the reader). An overall framework was not elaborated.	Addressed, partially
257	56 (V6)		5.1			I suggest to replace "WEEE" by "waste in scope of the CEWASTE scheme" or "waste" so that it can include waste batteries and other possible waste that may be added to the scope of the scheme when we revise it.		In WP2 there is no reference to the scheme. It is a good term for WP3 documents on the scheme.	Not considered
258	64	1334	5.8			Magnets from Power Steering and Generator are also NdFeB type. Loudspeakers from BEV and PHEV are likely to contain NdFeB	To add power steering, generator and loudspeakers. Our research group has dismantled a Nissan Leaf to characterise the magnets from the vehicle.	Loudspeakers are no in the scope	Not considered
259	60	1203	5.6		Specific comment	Another step is Packaging which seems to be missing.		Not to be addressed under CEWASTE requirements	Not considered

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260			Annex I			<p>I was recently involved in an analysis of lead contained in the portable batteries segment (as opposed to automotive and industrial batteries). My understanding from a very brief review performed at the time was that lead acid batteries:</p> <p>Are currently used in "ride-on toys" being placed on the market. We looked at various models offered on the internet and were quite surprised that at least most of these are equipped with lead acid batteries. Here is one:</p> <p>https://www.hood.de/i/toyota-tundra-12v-2x-35w-2x6v-7ah-suv-jp-kinderauto-mp3-softreifen-pickup-79847147.htm - its stated that it uses a Xinleine battery which after a quick look I can confirm to be Pb acid.</p> <p>I found this on UPS batteries from a quick look, confirming that typically a lead acid battery is used:</p> <p>https://www.infineon.com/cms/de/applications/solutions/power-supplies/uninterruptible-power-supply-ups/</p> <p>Apparently E-scooters (tread-roller) used to be built with a non-removable lead acid battery. The</p>		Small appliances are not within the CEWASTE scope	Not considered
261			5.6			<p>Question has been formulated also in relation to batteries though the CENELEC requirement is only related to WEEE - should reference to batteries be referred to in V7 (i.e. batteries shipped to treatment). Question in checklist:</p> <p>Do entities responsible for collection points ensure that facilities to which WEEE (or batteries) are shipped comply with EN 50614 (in case of WEEE to be prepared for re-use) or with the EN 50625 series in case of shipments to treatment facilities)?</p>		Standard 50614 on preparing for re-use is out of the scope (re-use is not of the scope).	Not considered
262	-	-			General comment	Legal compliance aspects which are regulated in other directives should not be addressed by CEWASTE.	Major revision of the report.	Agree with comment. However as this not a showstopper and proved to provide useful sources on new areas (gaps) we decided to keep it in the text with direct referencing	Not considered or only partially
263	33	583-584	4		General comment	I can not fully foresee the consequences of this requirement as such, but I am afraid that this will entail rather complicated processes and high costs.	Rethink requirements	Due diligence remains and chain of custody is taken out. This is a requirement only for lead-acid batteries and PCB and results a stakeholder consultation and agreement as explained in Notes to the Reader.	not considered or only partially

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264	-	-			General comment	Some of the proposed requirements and recommendations (in particular ISO/IWA and EN 50625 derived general elements) in the report are of general nature and go beyond the scope of CEWASTE.	Eliminate elements in the requirements which are of general nature and not directly related to the scope of CEWASTE.	Managerial requirements remain as this was agreed in the project proposal. On sustainability the ISO IWA references are kept to a minimum (e.g. only contractual aspects). Concerning the technical requirements, a matrix will be developed for version 8.0 explaining how tech requirements are sufficiently addressing CRM (or not, or are general). However, I don't think general req will be deleted.	Not considered or only partially
265		599	4			as a material accounting tool in order to demonstrate.....		Mass balance is not required anymore as this is not reasonably applicable for CRM flows. This text was deleted.	not considered or only partially
266	56	1108			Editorial comment	Sulfuric acid should not be stored indoors in large quantities	It is better to indicate what the limits are, which should not be exceeded	Not addressed. No thresholds have been identified.	Not considered or only partially
267	30 (V6)		4			There are two requirements here. The exact reference is clause 4.1.6 of CLC/TS 50625-4:2017 (instead of the generic "4.1").	Change the reference number from 4.1 to 4.1.6 of CLC/TS 50625-4:2017	Not clear where this was referred to	Not considered or only partially
268	70	1460	5.12.3.1.		Specific comment	add link to recycling targets of battery directive, and reporting obligation of recyclers (Council Regulation 493/2012)		Not considered here. In Europe this is anyway covered under legal requirements.	Not considered or only partially
269	56	1094	5.2		Specific comment	The reference to "Refer to clause 4.2 of EN 50625-2-1 for lamps" seems to be wrong - 4.2 is "Target value methodology"	Check and correct reference.	Not considered. 4.2 of EN 50625-2-1 is for technical and infrastructural pre-conditions.	Not considered or only partially
270	71	1502	5.12.3.2.		Specific comment	preparing for reuse measures?		Not considered. Preparing for re-use is not considered as materials for re-use are outside the scope of CEWASTE.	Not considered or only partially
271	47	910	4		General comment	What does this have to do with CEWASTE? Again it could be a general requirement for the whole 50625, but the project scope does not address this.	see also comment further up.	This clause on 'Local Communities Well-Being' remains mainly due to the global nature of the standard and of potential local communities concerned outside of Europe. This is also part of the sustainability requirements' and a recommendation (not a requirement).	Not considered or only partially
272	45	887-906	4		General comment	We don't see how this could fall within the scope of CEWASTE. If it is a requirement then it should be in the 50625 series and we guess the revision of 50625 is not within the scope of CEWASTE.	see similar remarks	This clause remains mainly due to the global nature of the standard and of the potential value chains concerned. Our assumption is that clearer (and formal) relationships with suppliers workers along the value value chain will ease the implementation of the CEWASTE requirements.	Not considered or only partially
273	53	1030	5		Specific comment		Include all WEEE in the figure and make distinction between KCE and the rest.	This is about the batteries graphic.	Not considered or only partially
274	45	858	4.9.2.1	Table 2	Specific comment			Unclear comment	Not considered or only partially

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275	57	1133-1135	5		General comment		Delete statements which are obvious.	While we agree that this sentence is trivial, we prefer not to delete it now as there is no other relevant requirement identified for magnets on 'infrastructural pre-conditions'. To be resumed in a next version.	Not considered or only partially