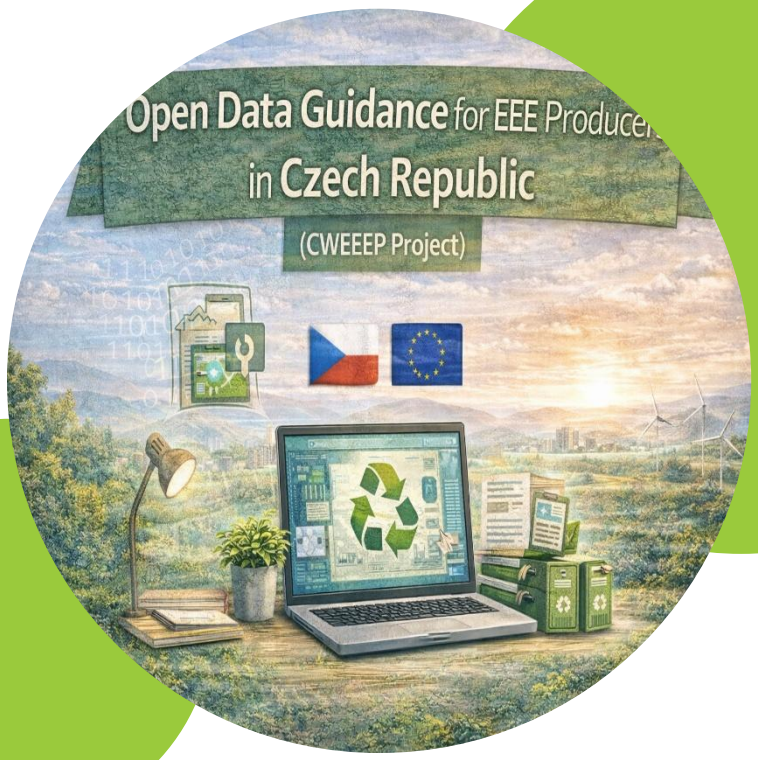
Open Data Guidance for EEE Producers in Czech Republic (CWEEEP Project)



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I. CONTENT

II. Introduction

The Circular WEEEP (CWEEEP) project aims to improve e-waste (WEEE) management through transparency and open data. This guidance pack provides Czech producers of electrical and electronic equipment (EEE) with a comprehensive overview of their obligations under EU and Czech laws, and practical instructions to openly publish required product information. It covers the **EU Waste Framework Directive**, the **WEEE Directive 2012/19/EU** (notably Article 15), and the new **Ecodesign for Sustainable Products Regulation (ESPR)** with its Digital Product Passport (DPP) requirements. Producers will learn what information they must disclose – such as materials, hazardous substances, performance data, repair instructions, and recycling/dismantling guidance – and **how to publish this data as open data**. References to relevant Czech regulations and institutions (e.g. Ministry of Environment and State Environmental Fund) are included. A **template** is provided at the end to help producers compile and share their open data package.

III. 1. Regulatory Obligations for EEE Producers

1.1 EU WASTE FRAMEWORK DIRECTIVE (WFD) OBLIGATIONS

The Waste Framework Directive (2008/98/EC as amended by 2018/851) establishes general requirements for waste prevention and extended producer responsibility. Under the WFD, EEE producers must **minimize hazardous substances** in products and **provide information on substances of concern** to facilitate safe waste management. In particular, the 2018 amendment introduced a new obligation effective January 2021: any supplier of an article (including EEE) containing a Substance of Very High Concern (SVHC) above 0.1% weight must **notify the European Chemicals Agency (ECHA)** with information about those substances[1]. ECHA has created the **SCIP database** for this purpose, which stores data on SVHCs in products and makes it accessible to waste treatment operators (and consumers upon request)[2]. This means Czech EEE producers need to report the presence of hazardous substances (e.g. certain flame retardants, heavy metals in components, etc.) into the SCIP database. This fulfills the WFD's goal of ensuring waste handlers know about dangerous substances in e-waste and can take proper precautions during recycling.

Beyond chemical reporting, the WFD also embeds the principle of **Extended Producer Responsibility (EPR)**. Producers are financially and organizationally responsible for the end-of-life of their products, which includes taking measures to facilitate reuse, collection, and recycling. The WFD sets minimum requirements for EPR schemes – for example, producers should contribute to public awareness and provide data to authorities on product volumes and waste management. Many of these general obligations are concretized for electronics through the WEEE Directive (see next section).

1.2 WEEE DIRECTIVE 2012/19/EU – ARTICLE 15 INFORMATION REQUIREMENT

The WEEE Directive specifically addresses waste electrical and electronic equipment. Under WEEE Directive 2012/19/EU, producers have comprehensive responsibilities: registering in each EU country where they sell EEE, financing collection and recycling, meeting recovery targets, and informing users and recyclers. **Article 15** of the WEEE Directive is especially important for product information. It **requires producers to provide information free of charge about the preparation for re-use and the treatment of each type of new EEE** they place on the market[3]. In practice, within one year of a product's market launch, the producer must make available information that helps **reuse centers and recycling facilities** properly dismantle and handle the device at end-of-life.

This includes **dismantling instructions, locations of dangerous substances, and components that require separate treatment**.

For example, a producer should indicate if a product contains a battery, mercury lamps, printed circuit boards, asbestos, or other items listed in **Annex VII of the WEEE Directive** that must be removed prior to shredding. The goal is to **facilitate safe and environmentally sound recycling**[4]. Article 15 information typically covers the **presence and location of materials and components** that need special treatment (e.g. batteries, circuit boards, plastics with brominated flame retardants) and how to remove them[4]. This information must be provided **free of charge** (e.g. via manuals, online databases, or datasheets)[3] to treatment operators.

To help producers comply with this in a practical way, industry organizations have created the **Information for Recyclers (I4R) platform**[5]. The I4R platform (hosted by the WEEE Forum) contains product category "fiches" where producers share recycling information at an industry-wide level. While I4R provides generalized data by product category (not brand-specific)[6], individual producers may also publish **device-specific treatment instructions** on their websites or in user manuals. In summary, under WEEE law, Czech producers must ensure that both **consumers** and **recyclers** have access to key information: consumers should be informed not to dispose of electronics in trash and about take-back options (WEEE Directive Article 14), and recyclers must be given **dismantling and hazardous substance information** (Article 15)[3].

1.3 ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION (ESPR) AND DIGITAL PRODUCT PASSPORT

The Ecodesign for Sustainable Products Regulation (ESPR, Regulation (EU) 2024/1781) is a **new EU framework** that entered into force on 18 July 2024[7]. It replaces the older Ecodesign Directive and significantly expands product sustainability requirements. The ESPR empowers the European Commission to set **specific ecodesign requirements** for almost all product groups, including electronics[8][9]. These requirements will cover both product performance (e.g. energy efficiency, durability) and **product information**. A cornerstone of the ESPR is the introduction of the **Digital Product Passport (DPP)**, essentially a **digital record for each product** that houses relevant sustainability information[10].

Under the ESPR, for certain products it will be **mandatory to have a Digital Product Passport from 2024 onward** (with a phased implementation by product group). Products requiring a DPP must be **registered in an EU-wide DPP registry** managed by the European Commission[11]. The passport is intended to ensure **reliable, standardized information** is available to all stakeholders – consumers, businesses, regulators, and recyclers – through an electronic platform[11]. Information in the DPP will be accessible via a data carrier on the product (e.g. a QR code) that can be scanned to retrieve the data free of charge[12].

The **content of the Digital Product Passport** will be defined in delegated acts for each product group, but generally it will include a **summary of key details** about the product's composition and lifecycle[13]. Notably, the DPP is expected to contain:

- **Materials used:** A breakdown of the materials or processed substances in the product (including their origin, and percentage or weight)[13].
- **Chemical substances of concern:** Information on any hazardous chemicals present in the product (for example, brominated flame retardants or heavy

metals), aligning with the goal of "addressing the presence of substances that inhibit circularity"[14] and echoing the SCIP reporting requirement.

- **Technical performance and environmental footprint:** Key performance indicators such as energy consumption, efficiency class, carbon footprint, and durability metrics[15].
- **Reparability and spare parts:** Details on the product's repairability (e.g. a repair score or index) and the availability of spare parts and software support[13]. The ESPR explicitly aims to improve durability, reusability, upgradability, and repairability of products[9], so the DPP will include information to support repair and maintenance.
- **End-of-life information:** Guidance on proper disposal or recycling of the product, such as which components can be recycled and how, akin to "information on appropriate disposal"[13].
- **Lifecycle impacts:** Possibly data on the product's overall environmental impact across its life (though the exact data fields will depend on the delegated acts for that product). The Commission notes that DPP data can include lifecycle environmental impacts and recycling capabilities[15].

In short, the ESPR/DPP framework will **mandate producers to digitally share much of the same information** that progressive companies might already provide voluntarily. Starting with priority sectors (textiles, ICT/electronics, batteries, etc.), producers in Czechia will need to collect detailed data about their products and upload it to the EU's digital system. The **DPP is expected to become a key tool from 2024 onward** for transparency – customs authorities can even use it to check compliance of imported goods[16]. Czech producers should monitor the delegated regulations for their product category (the first ESPR workplan prioritizes electronics/ICT among other sectors[17][18]) so they can meet the DPP requirements as they roll out.

Summary: Across these EU laws, there is a clear trend toward requiring producers to openly share product information to support reuse, repair, and recycling. The WFD (SCIP) focuses on **hazardous substance disclosure**, the WEEE Directive focuses on **reuse/recycle instructions**, and the ESPR introduces a comprehensive **Digital Product Passport** covering a wide range of product data. Non-compliance can lead to enforcement actions – under the ESPR, products without a required DPP cannot be sold in the EU[19], and Member States will penalize infringements with fines or other measures[20][21]. It is therefore both a legal obligation and a good sustainability practice for producers to compile and publish detailed information about their EEE products.

IV. 2. Information Producers Must Provide

Based on the legislation above, EEE producers must prepare and disclose several categories of information about their products. Below is a breakdown of **what information must be provided**, and why each item is important:

- **Materials Used (Product Composition):** Producers should list the materials that make up their product, ideally with percentages or weights. This includes metals (steel, aluminum, copper, etc.), plastics (type of polymer), glass, electronics, etc. Sharing the material composition supports recycling (knowing what materials can be recovered) and helps fulfill DPP requirements on disclosing a product's contents[13]. For example, the digital product passport will likely require a summary of "processed materials" in the product[13]. Openly providing a **Bill of**

Materials or a composition table allows recyclers and re-users to identify valuable or recyclable parts. It also aligns with open data principles by treating material data as a public resource for innovators (e.g. those who might source recycled materials). Where possible, indicate the **recycled content** of materials and the origin (local, imported), since the ESPR encourages increasing recycled content[22].

- **Substances of Concern:** Identify any hazardous or sensitive substances in the EEE. This typically refers to substances covered by regulations like **REACH Candidate List SVHCs**, RoHS (lead, mercury, cadmium, PBDE flame retardants, etc.), or other substances that could impede recycling. Under EU law, producers are obliged to communicate the presence of SVHCs >0.1% to ECHA's SCIP database[1], and the Digital Product Passport will include a summary of "chemical substances" in the product[13]. In this guidance, producers should openly list such substances in their product documentation as well. For example: "This device contains a lithium-ion battery with electrolyte containing EC (a solvent) and a printed circuit board that includes lead solder." By listing substances of concern and their location, you help waste processors safely remove those parts and comply with WEEE Annex VII (which mandates separate treatment for hazardous components)[4]. It also informs downstream users (repair shops, second-hand buyers) about any risks. **Transparency about hazardous substances** is both a legal duty and a corporate responsibility to the environment.
- **Performance Data:** Provide key performance and technical data about the product. This can include **energy consumption** (e.g. wattage, annual kWh usage for appliances), efficiency ratings (such as an EU energy label class), battery life for electronics, and other functional performance metrics (e.g. screen size, capacity, etc. if relevant to environmental performance). Under the ESPR, "product's technical performance" is explicitly mentioned as information that may be required in the DPP[15]. Performance data also encompasses durability and reliability indicators: for instance, the number of charge cycles a battery supports, or the expected lifetime in hours of use. If the product has been rated for repairability or durability (some EU initiatives and standards provide repairability scoring), include that as well. **Environmental performance** data such as the product's carbon footprint or compliance with Ecodesign energy efficiency standards should be published if available. By sharing performance data openly, producers not only comply with forthcoming requirements but also enable consumers to make informed comparisons and researchers to analyze products' environmental impacts.
- **Repair and Maintenance Instructions:** Producers must provide information to facilitate the repair and maintenance of their products. This includes **repair guides, service manuals, schematics, and maintenance tips**. Traditionally, some of this information was only shared with authorized service centers, but there is a strong movement (and emerging regulations) toward making repair information public. In fact, right-to-repair advocates emphasize that **"service manuals should be free and public"[23]** so that any owner or independent technician can fix the device. Under EU Ecodesign rules already in effect for certain appliances, manufacturers are required to make spare parts and repair manuals available to professional repairers. The new ESPR will likely strengthen this by requiring that repair information (and data on available spare parts) be part of the Digital Product Passport[13]. Producers in Czechia should thus compile clear **step-by-step repair instructions**, either in text or video format, and publish

them openly (for example, on their website or an open platform). Include information such as: how to safely open the device, what tools are needed, part numbers for replaceable components, and troubleshooting for common faults. Good examples to follow are the guides on iFixit.com – iFixit's best practices include clear disassembly steps with photos, and they have proven that openly shared repair knowledge extends product lifespans. Making maintenance information openly available empowers consumers, reduces electronic waste, and will ensure compliance with "right to repair" aspects of EU law.

- **Recycling and Dismantling Instructions:** In addition to repair info (which targets keeping the product alive longer), producers must also provide guidance for the product's **end-of-life handling**. These instructions overlap with the WEEE Article 15 requirement discussed earlier: information for recyclers on how to dismantle the product and remove hazardous or valuable components. **Recycling instructions** should identify the location of any dangerous substances (e.g. "the backlight contains a mercury lamp – remove the lamp module before shredding") and the steps to disassemble the product into major material fractions. For instance, a producer might provide a disassembly diagram indicating screws to undo, parts that snap off, and the sequence of component removal. It is helpful to specify which parts are made of which materials (tying back to the materials list) so recyclers can sort them appropriately. This category of information is often delivered via a **recycling manual or datasheet**. As noted, producers can use a platform like I4R (Information for Recyclers) to share at least generic treatment info for their product category[5]. However, providing **product-specific** dismantling guides on your website or in the documentation kit is highly encouraged. Remember that per WEEE Directive Article 15, this info must be provided **at no cost** to the recyclers[3] – posting it openly online satisfies that. Effective recycling instructions ultimately ensure that your product, once discarded, can be processed with minimal environmental harm and maximum resource recovery.

Important: All the above information should be **kept up to date**. If a product is revised (e.g. a new hardware version using different materials), the producer should update the public data accordingly. Each product (or product family) should have a readily accessible "product information file" containing these details. In the next section, we discuss **how to publish** this information as open data in practice.

V. 3. How to Publish Product Data as Open Data

Publishing data "openly" means making it accessible to anyone, in a format that is easy to retrieve and reuse. EEE producers are encouraged to go beyond just complying in a minimal way (e.g. emailing a PDF on request) – instead, **proactively release the required information on a public platform**. Here are guidelines and steps to ensure the data is shared in line with **open data principles**:

- **Use Open Formats:** Provide information in formats that are widely used and machine-readable. For textual and instructional content, PDF documents are acceptable (PDF/A for archiving) since they are easy to open and share. However, for **data tables** (like a list of materials or substances), consider using CSV (Comma-Separated Values) or XML/JSON. For example, a BOM (Bill of Materials) can be shared as a CSV file with columns for part name, material, weight, etc. Using open, non-proprietary formats ensures that anyone (including regulators,

researchers, other companies) can load the data without needing special software.

- **Ensure Free and Public Access:** The data should be accessible without any login, payment, or restriction. An ideal approach is to host the information on your company's website under a dedicated section (for instance, "Sustainability" or "Product Environmental Information"). Make the links easy to find – e.g. on each product page, include a link to its "Environmental data sheet" or "Open data package." This fulfills the "free of charge" requirement of WEEE and also the open data ethos. If possible, apply an open license (such as CC-BY or CC0) to the data files so that others can reuse the information freely. In practical terms, simply adding a note like "This document is provided as open data under a CC-BY license" on the page can clarify that others (e.g. researchers, NGOs) can download and use the data.
- **Structured and Searchable:** Follow a consistent structure for your information. A good practice is to create a template (see Section 5) so that each product's data is organized in the same way (materials, substances, performance, etc.). This consistency makes it easier for databases or interested parties to parse your data. Additionally, use clear, standard terminology (e.g. use material names that align with common standards or codes, like "ABS plastic" or "PCB (printed circuit board)"). If your data is in CSV or JSON format, include a header row or schema definition for clarity. Consider aligning with any **EU harmonized format** if available – for instance, the upcoming Digital Product Passport system may define a data schema for certain info; using that schema in advance would future-proof your open data publication.
- **Leverage Existing Platforms:** Besides your own website, you can utilize existing open data or compliance platforms:
- **EU DPP Registry:** Once operational for your product group, registering your product's Digital Product Passport in the EU system will be mandatory. Ensure all required fields are filled and up-to-date. The DPP registry managed by the European Commission will likely serve as an open or semi-open platform where much of your product data can be accessed by authorized parties[11]. Stay informed on how to interface with this registry (possibly via an API or web portal).
- **State Environmental Fund / Ministry Platforms:** In Czechia, producers report certain data to authorities through systems like **ISPOP** (the Information System for Reporting Obligations)[24]. While these are typically for regulatory reporting (e.g. annual quantities placed on market, collected WEEE volumes), check if they plan to incorporate product information as well. The **Ministry of Environment (MŽP)** and the **State Environmental Fund (SFŽP)** are key institutions overseeing WEEE compliance. The SFŽP in particular manages the **List of Producers** registration and EPR fund contributions[25][26]. Currently, Czech authorities may not have a public portal for detailed product-by-product info, but **engage with them** – they might welcome producers uploading repair/recycling manuals to a central repository. At minimum, ensure your required filings (like the Annual Report on end-of-life products[27]) reference or include your open data publications.
- **I4R (Information for Recyclers) Platform:** As mentioned, this is an EU-level tool to satisfy WEEE Article 15. Czech producers can coordinate with their industry associations or WEEE compliance scheme (see Section 4) to contribute to I4R. While I4R currently provides info at category level[6], if you have more detailed info

(e.g. a unique design with an unusual hazardous component), consider uploading a specific fiche or document and ensure recyclers are aware of it.

- **Open Data Portals:** Optionally, producers may also publish their datasets on open data portals (for broader discoverability). For instance, the EU Open Data Portal or the national Czech open data portal (data.gov.cz) could be avenues to share non-sensitive product environmental data. This is not required by law, but doing so can improve transparency and earn goodwill. It signals that the company treats this information as publicly beneficial knowledge.
- **Step-by-Step Publication Process:** Below is a practical step-by-step procedure tailored for Czech producers compiling an open data package for their EEE product:
- **Collect Internal Data:** Gather all relevant information from design, engineering, and compliance teams. This includes the bill of materials from R&D, the hazardous substances lists from regulatory compliance (REACH/RoHS data), performance specs from product testing (energy use, etc.), and any service manuals or instructions from your technical writers. Early in the design process, ensure these data points are documented – it will make compliance easier later[28] (ESPR will require technical documentation and conformity assessment, so having this info is essential anyway).
- **Use the Template Structure:** Organize the collected data according to a standard structure (such as the template provided in Section 5). Make sure you have entries for each key category (materials, substances, performance, repair, recycling). Fill in the template with the specifics of your product. For example, under "Materials," list all primary materials by weight; under "Repair info," provide the link to a PDF manual or include the instructions text.
- **Choose File Formats:** Decide on the best format for each type of content. For lists and tabular data (materials, substances, parts), prepare a CSV or spreadsheet file. For narrative and instructional content (repair guide, dismantling procedure), use PDF or HTML. Ensure that file names are clear (e.g., Product1234_materials.csv, Product1234_repair_manual.pdf). It's a good practice to also provide a brief README or description file in plain text/Markdown describing the package and its files.
- **Publish on Your Website:** Upload these files to a publicly accessible section of your website. Create a page dedicated to "Product Environmental Information" for your product model. On that page, provide a brief introduction (what the data is) and links to download each file. Ensure there are no barriers (no login, no captcha that might block automated access). If your company has multiple products, consider an index page listing all models with their data packages for easy navigation.
- **Provide Context and Contact:** Along with the raw data files, provide context so it's understandable. For instance, note any standards followed (e.g., "material composition is reported per IEC 62474 standard format" if applicable). Provide a contact email for questions about the data. Also, on the webpage, mention that the information is provided to fulfill WEEE/ESPR obligations and to help recyclers and consumers (transparency is appreciated).
- **Notify Stakeholders:** Once published, inform the relevant parties. This includes your **WEEE compliance scheme** (they might link to your info or use it in their own reporting), the **Ministry/SEF** if appropriate (especially if it's something like a Digital

Product Passport registration – share the ID or link), and downstream partners like recyclers. For example, if you work with a particular recycler, you could directly send them the link to your dismantling guide. Similarly, let repair communities know – for instance, share the news with platforms like iFixit or repair cafés that you have published repair manuals.

- **Submit to Databases:** Fulfill the formal submissions: input the data into the **SCIP database** (for substances) by using ECHA's online portal or system-to-system transfer. When the **DPP system** is live for your sector, upload the required information there as well (the DPP might cover much of the same info, but until it's fully operational, your website remains the primary public channel). Make sure that what you publish openly matches what you submit officially. Consistency avoids confusion.
- **Maintain and Update:** Treat the open data package as a living document. Assign responsibility within your team to update the files when product specifications change or new regulatory changes come in. Also, keep track of new requirements – for instance, if a new substance gets restricted and needs disclosure, update your "Substances of concern" list promptly. Each file should have a version number or date. Regular updates also signal to regulators that you are actively managing compliance.

By following these steps, Czech producers can ensure they **publish high-quality open data** that satisfies legal obligations and benefits the circular economy. The approach also transforms compliance from a paperwork burden into an opportunity for stakeholder engagement – consumers increasingly appreciate companies that are transparent about product content and repairability.

Open Data Principles in Practice: To recap, when publishing, adhere to principles like **availability, accessibility, and reusability**. Data should be **discoverable** (search-engine indexed, and perhaps listed on data portals), **machine-readable** (so others can analyze it easily), and **under an open license** (so it can be reused in research, education, or comparison tools). For example, a university researcher might use the open data on material composition to study recycling efficiencies, or a comparison website might show which brands provide more repair-friendly information – this kind of reuse is only possible if your data is truly open. By embracing open data, producers also contribute to broader initiatives – for instance, the **European Circular Economy Stakeholder Platform** highlights the importance of data sharing in fighting e-waste[29]. In summary, publishing your product information as open data is not just about compliance, but about demonstrating leadership in sustainability and producer responsibility.

VI. 4. Czech National Regulations and Institutions

In the Czech Republic, EU directives like WEEE are implemented via national law and overseen by designated authorities. Czech producers must comply with these national requirements in addition to the EU-level obligations:

- **Act No. 542/2020 Coll., on End-of-Life Products:** This is the Czech law that transposes the WEEE Directive (and other product EPR directives) into national legislation[25]. It defines who is considered a "manufacturer" (producer) of EEE in Czechia[30][31] and outlines their duties. Under Act 542/2020, EEE producers must register in the **List of Manufacturers** (a national register) and fulfill take-back and recycling obligations, either individually or more commonly through a **compliance scheme**. The Act requires producers to keep records and submit an

Annual Report on end-of-life products to the Ministry of Environment by 31 March each year, detailing quantities placed on market and waste collected/recycled[27]. It also mandates how information on recycling fees is shown on invoices (visible recycling contribution)[32]. Producers should be aware that providing false data can lead to penalties. While Act 542/2020 focuses on waste management duties, it complements the information obligations: for instance, Section 27 of the Act requires producers to maintain records of products and how they are handled at end-of-life[33][34], which implies that having detailed product information (as per Section 2 of this guide) is necessary for accurate record-keeping.

- **Ministry of Environment (MŽP):** The Ministry is the central authority for waste management policy and WEEE implementation in Czechia. It issues decrees that provide technical details (for example, a decree can specify the exact **scope of annual report content** or record-keeping requirements[35][27]). The Ministry also supervises compliance schemes and can enforce producer obligations. Producers may interact with the Ministry when registering or if there are compliance issues. For instance, foreign producers selling in Czechia must appoint an **authorized representative** in the country, and this too is registered with the Ministry[36]. In terms of information, the Ministry (often via its agencies) may publish guidance – check the Ministry's website for any WEEE guidance documents or templates in Czech language. Cooperation with the Ministry is key, especially as new rules like DPP come – the national authorities will coordinate with the EU to implement those.
- **State Environmental Fund (SFŽP ČR):** The State Environmental Fund is a public institution under the Ministry, primarily known for financing environmental projects. However, SFŽP also plays a role in the administration of EPR schemes. In practice, SFŽP manages the registration of producers in some product categories and handles fees collected for historical waste, etc. The SFŽP has been involved in e-waste management programs and awareness campaigns[37]. For producers, one critical aspect is that **the List of EEE Producers is maintained (directly or indirectly) through SFŽP's systems**, likely via the online ISPOP portal (run by CENIA, the Czech Environmental Information Agency)[24]. When you register your company as an EEE manufacturer/importer, that registration is lodged with the authorities (SFŽP/MŽP). Make sure to **keep your registration up to date** – including details like company address, product categories of EEE you deal in, and any appointed representative. SFŽP may also require producers to report how they fulfill their information obligations (for example, the annual report might include a section where you declare that you have provided Article 15 info for all new products). Keep records of your open data publications and any communications (like screenshots of your website or copies of manuals) in case you need to demonstrate compliance to SFŽP or an inspector.
- **Authorized Compliance Schemes (Collective Systems):** In Czechia, most EEE producers fulfill their take-back and recycling duties by joining a collective compliance scheme (called "kolektivní systém"). Examples include **ASEKOL, ELEKTROWIN, REMA,** and others, each handling certain categories of electronics. These schemes are non-profit organizations that arrange nationwide collection of e-waste and ensure recycling targets are met[26]. When you join a scheme, you pay fees based on the amount of EEE you put on the market, and the scheme takes care of collection and reporting. However, **the producer retains responsibility for providing product information**. Compliance schemes often assist by guiding

their members on legal obligations. They might, for instance, remind you to supply treatment information for new products or even facilitate uploading info to I4R. It's wise to liaise with your scheme about open data: they might be interested in aggregating member data to showcase overall industry transparency. Some schemes (like ASEKOL) publish public reports and could include examples of best practices by producers. Ultimately, while the scheme will handle physical collection and recycling, the **data and documentation about your products must come from you**. So ensure you deliver any required info to the scheme and keep them informed of where your manuals/instructions are available.

- **Czech Standards and Regulations:** Besides Act 542/2020, be aware of related regulations. The Czech Waste Act (overall framework) and implementing decrees might have additional requirements, such as labeling of EEE (e.g. the crossed-out wheelie bin symbol must be on devices) and providing consumer information in Czech. Also, Czech laws on chemicals and product safety could intersect – for instance, if your product has hazardous substances, Czech chemical law (which implements REACH) might require certain hazard communications. The **Czech Trade Inspection (ČOI)** could check that consumer-facing info (like energy labels or user manuals with disposal instructions) is provided in the local language. Always provide at least the **basic disposal and recycling instructions in Czech** in your user manuals or on your website to comply with consumer information duties. For the more technical recycling info aimed at recyclers, English is generally acceptable (recyclers in EU often use English resources, and Article 15 info can be in any EU language), but providing Czech versions could be beneficial for local treatment facilities' staff.

Key Institutions Contact Info: The Ministry of Environment (MŽP) is reachable via its Waste Management Department for WEEE queries, and SFŽP (State Environmental Fund) has a section on producer responsibilities. CENIA (cenia.cz) might also have a helpdesk for ISPOP where you file reports. It's recommended to consult the **official Czech WEEE methodological guidance** if available (often published on MŽP or SFŽP websites). The CWEEEP project itself may coordinate with these bodies to disseminate this guidance, so producers might receive updates through CWEEEP channels.

In summary, Czech producers should view the national authorities and compliance schemes as **partners in achieving compliance**. By providing open data on products, you not only fulfill what the law expects but also contribute to the goals these institutions are promoting: better recycling rates, informed consumers, and reduced environmental harm from e-waste.

VII. 5. Template for an Open Data Producer Information Package

Below is a practical template outline that Czech EEE producers can use to create and publish their open data package. This template can be adapted to a document or a set of files. It ensures that all the required information (from Section 2) is organized clearly. Producers can fill in each section with the specifics of their product and then share this as a downloadable PDF or web page, accompanied by supplementary CSV data files as needed.

OPEN DATA PRODUCT INFORMATION TEMPLATE:

- **Product Name and Model Identifier:**
  (Example: "XYZ SuperClean Vacuum, Model 1234" – Include model numbers or SKUs that this data applies to.)

- **Producer Information:**
  (Company name, address, contact email for product compliance. If you have a Czech authorized representative, include their details as well.)
- **Description of Product:**
  (Brief description of what the product is, its category/use. E.g., "Cordless handheld vacuum cleaner, 18V, for home use." This gives context to readers like recyclers or regulators.)
- **Materials Composition:**
  (List the main materials and components by weight or percentage. You can use a small table here or refer to an attached CSV file for full details. Include entries for metals, plastics (with polymer type), glass, circuit boards, batteries, etc. Example entry: "ABS plastic – 1.2 kg (housing); Steel – 0.5 kg (motor and screws); Lithium-ion battery – 0.3 kg; Copper – 0.1 kg (wiring and motor windings);" The sum should roughly equal the product weight. If available, note recycled material content, e.g. "30% of plastic is recycled ABS.")
- **Substances of Concern:**
  (Identify any hazardous substances present above regulatory thresholds, or any materials that need special handling. For each such substance, mention where it is found in the product. Example: "Lead (Pb) – present in solder on the main circuit board, approximately 5 g. The board should be removed and processed separately as per WEEE Annex VII.[4] Mercury – present in the display backlight lamp, <1 g, to be removed before shredding. No other Annex II restricted substances are intentionally used." If none beyond RoHS limits, you can state "All components are RoHS compliant; no SVHC above 0.1% w/w, except as noted.")
- **Technical Performance Data:**
  (Provide key performance parameters. Examples: "Energy consumption: 500 W (A+ energy class)[38]; Standby power < 0.5 W. Battery capacity: 2000 mAh, offering 30 minutes runtime per charge. Motor lifetime: rated for 1000 hours use. Noise level: 60 dB. Warranty: 2 years." Include any durability or efficiency information that is relevant to environmental performance. If an official repairability score or energy label rating exists, include it. This section helps fulfill DPP technical data requirements[15].)
- **Repair and Maintenance Information:**
  (Explain how users or technicians can maintain and repair the product. This may be a summary plus a link to a full repair manual or guide. Example: "The device is designed for easy disassembly: eight standard Phillips screws hold the casing. Repair manual: See attached PDF 'XYZ_Vacuum_RepairGuide.pdf' for step-by-step instructions with photos (covers replacing the battery, motor, and cleaning the filter). Basic maintenance: filter should be cleaned monthly (see user manual p.10). Spare parts (battery, filter, motor brushes) are available from the manufacturer's website. The product is designed following repairability best practices (no glued shut components, battery removable)." Emphasize that manuals or parts lists are provided for free, aligning with right-to-repair principles[23].)
- **Recycling and Dismantling Instructions:**
  (Provide guidance for end-of-life treatment. Example: "Dismantling procedure: 1) Remove the battery by opening the bottom cover (no tools needed) – recycle battery separately as Li-ion. 2) Unscrew the casing (8 screws) to access internal components. 3) Detach the circuit board – it contains lead solder and should go

to electronics recycling. 4) Separate plastic parts (housing is ABS, suitable for material recycling) from metal parts (motor assembly is mainly steel and copper). Hazardous components: a small mercury-containing lamp is in the indicator panel – carefully remove it and treat as hazardous waste. See attached schematic 'XYZ_Vacuum_RecycleDiagram.pdf' highlighting component locations and removal steps. The design aligns with WEEE requirements to remove certain components for separate treatment[4]. Recycling facilities can also find category-level info on the I4R platform under "Small Appliances.")

- **Compliance and Standards:**
  (Optionally, list any standards or regulations this product adheres to, related to environment. E.g., "Complies with EU WEEE Directive 2012/19/EU – information provided per Article 15. Complies with EU Battery Regulation (battery replaceable). Information compiled according to IEC 62474 material declaration standard." This can reassure authorities that you followed known formats.)
- **Data License and Update:**
  (State that this information is openly published and include date/version. Example: "Published: Jan 2025. This data is provided under CC-BY 4.0 license for open use. It will be updated as needed – check [company website] for the latest version.")

This template can be used as a checklist to ensure all necessary information is covered. Producers might produce a single PDF document containing all the above sections for each product, and additionally provide machine-readable files (like the materials list in CSV). By following a standardized template, it becomes easier for recyclers, repairers, and regulators to find the info they need quickly for any product.

Using the Template: For instance, if you are a producer of washing machines, you would create a document for each model line covering these sections – listing out the materials (drum stainless steel weight, plastic housing, electronic board, etc.), substances (maybe "contains PFAS in wiring insulation" if applicable, or stating compliance), performance (energy label A, water consumption per cycle, etc.), repair info (how to open top, replace pump, etc.), and recycling (how to remove motor, etc.). You would then publish this on your website and perhaps notify the Czech Ministry or your compliance scheme that such info is available openly. Not only does this fulfill Article 15 of WEEE Directive and anticipated DPP requirements, it also showcases your company's commitment to sustainability and transparency on the CWEEEP platform and beyond.

VIII. Conclusion

By understanding and meeting these obligations, Czech EEE producers will not only comply with the Waste Framework Directive, WEEE Directive, and ESPR/Digital Product Passport requirements, but will also support a more circular economy. Providing open, accessible data about products – from material composition to repair manuals – empowers recyclers, repairers, consumers, and regulators alike. The CWEEEP project encourages all producers to adopt these practices, using this guidance pack as a roadmap. Through proactive disclosure and open data, the industry can greatly improve e-waste management and resource recovery in the Czech Republic, setting an example for environmental responsibility.

IX. Sources:

- EU Directive 2012/19/EU (WEEE Directive), Article 15 – **Information for treatment facilities** (obliging producers to provide reuse/recycling information)[3] -
- EU Waste Framework Directive (2008/98/EC as amended by 2018/851) – provisions on hazardous substance information (SCIP database)[1][2].
- Ecodesign for Sustainable Products Regulation (EU 2024/1781) – introduces Digital Product Passport (product data requirements from 2024)[11][15].
- WEEE Information for Recyclers platform (I4R) – example of industry solution for Article 15 compliance[4][5].
- iFixit (Right to Repair advocacy) – emphasizing that repair manuals should be public[23] as a best practice for producers.
- Czech Act No. 542/2020 Coll. on End-of-Life Products – national law implementing WEEE, defining producer responsibilities[25][26].
- Czech Ministry of Environment / State Environmental Fund – authorities overseeing WEEE compliance and producer register[27][39].

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[1] [2] The SCIP Database under Directive (EU) 2018/851

https://www.reachlaw.fi/wp-content/uploads/2020/01/scip-database_-stoffr_-zeitschrift-fur-stoffrecht.pdf

[3] [5] [29] I4R - Information for Recyclers Platform | European Circular Economy Stakeholder Platform

https://circulareconomy.europa.eu/platform/en/dialogue/existing-eu-platforms/i4r-information-recyclers-platform

[4] [6] I4R platform allows EEE producers to comply with article 15 of the WEEE Directive | WEEE Forum

https://weee-forum.org/ws_news/i4r-platform-enables-eee-producers-to-comply-with-article-15-of-the-weee-directive/

[7] [8] [9] [10] [14] [15] [16] [22] [38] Ecodesign for Sustainable Products Regulation - European Commission

https://commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/ecodesign-sustainable-products-regulation_en

[11] [12] [13] [17] [18] [19] [20] [21] [28] Eight key aspects to know about the EU Ecodesign for Sustainable Products Regulation | White & Case LLP

https://www.whitecase.com/insight-alert/eight-key-aspects-know-about-eu-ecodesign-sustainable-products-regulation

[23] What Right to Repair Means for Manufacturers - iFixit

https://www.ifixit.com/News/61178/what-right-to-repair-compliance-looks-like-for-manufacturers

[24] The Czech Republic's electronic waste register has been rated the ...

https://cenia.gov.cz/2023/05/02/the-czech-republics-electronic-waste-register-has-been-rated-the-best-in-europe/

[25] [26] [27] [30] [31] [32] [33] [34] [35] [36] Legislation ♻ ASEKOL

https://www.asekol.cz/en/legislativa

[37] [39] [PDF] Transnational Action Plan for WEEEP-CE - Interreg Central Europe

https://www.interreg-central.eu/wp-content/uploads/2024/12/Transnational-Action-Plan_Circular-WEEEP.pdf