Market surveillance and circular economy
Products
- Biocides
- Fireworks and explosives
- Articles of precious metals
- Gas equipment
- Plant protection products
- Transport tanks for chemicals and dangerous goods

Services
- Inspection, testing and other compliance assessment services
- Installation and maintenance services
- Consumer services

Installations
- Electrical equipment
- Gas, oil and refrigeration equipment
- Pressurised systems

Plants and mines
- Chemical applications
- Explosives factories and warehouses
- Mines
- Mineral exploration
- Gold panning

Accreditation
- Laboratories
- Certification bodies
- Inspection bodies
- Providers of proficiency testing
- Verifiers

Chemical products
- Cosmetics
- Consumer products
- Measuring instruments
- Pressure equipment
- Rescue service equipment

Construction products
- Electrical and electronic appliances
- Industrial and consumer chemicals

Industrial and consumer chemicals
- Biocides
- Fireworks and explosives
- Articles of precious metals
- Gas equipment
- Plant protection products
- Transport tanks for chemicals and dangerous goods

Cosmetics
- Consumer products
- Measuring instruments
- Pressure equipment
- Rescue service equipment

Consumer products
- Measuring instruments
- Pressure equipment
- Rescue service equipment

Measuring instruments
- Pressure equipment
- Rescue service equipment

Pressure equipment
- Rescue service equipment

Rescue service equipment
Market surveillance

• Ensures that the devices and equipment on the market are safe for people’s health, property and the environment (and otherwise compliant)

• Aims on ensuring a level playing field in the market

• Regulation has focused a lot on safety, but emphasis on environmental issues is growing (RoHS, Ecodesign, Single Use Products, WEEE...)

• Only small part of the products in the market are proactively checked by market surveillance or by third party

• Products are checked by MSAs only after they have entered the market, usually in environmental point-of-view ”the damage” has already been done (e.g. includes hazardous substances)
  • From safety perspective the damage is yet to come

• Best way to advance circular economy perspective in products is to have regulations related to it (and enough resources for market surveillance)
  • Some regulations already exists under the ecodesign directive
What to consider when writing regulation?

• Are the requirements even possible? For example, if the requirement is to use 50% recycled materials, is there enough recycled material available (e.g. batteries)?

• Is the requirement something that is needed/used in practise?
  • E.g. companies dismantling electronics do not have time to search dismantling instructions online for each of the products, but legislation requires the information to be there

• Will there be requirements that are difficult or impossible to measure or monitor?
  • Is the requirement specific or very general?
  • Can they be fulfilled with good paperwork with no actual positive impact?
  • Are there suitable testing standards? How to prove that requirements are fulfilled?
    • How to measure the amount of recycled materials in the product?
    • How to monitor how unsold items have been demolished?
    • Requirements for design and manufacturing process? Products done usually outside Finland -> no jurisdiction
Reuse/repair/recycling from market surveillance perspective

• Selling recycled/fixed/upgraded products is a growing business
  • Electrical appliances, construction products, jewelry etc.

• Products need to comply with the regulation which is in force the day they are placed on the market

• Becoming a totally new product
  • E.g. jewelry is made from old bike tires (requirements for chemicals are totally different)

• Becoming a modified similar product: product which has been subject to important changes or overhauls aiming to modify its original performance, purpose or type may be considered as a new product
  • The person/company who carries out the changes becomes then the manufacturer with the corresponding obligations.
  • Does the new product fulfill the current regulation?
    • Good aims of circular economy vs. reality of regulation requirements
  • Couple examples on the next slides:
Power chain starts buying and selling used home electronics, aiming to get 20,000 tonnes of scrap a year for recycling from Finland, Denmark and Norway.

Power will start buying used devices in mid-October. The first second-hand product trading facility will open in November,” says Juha-Mikko Saviluoto, CEO.

- Old fridge with new motor -> more efficient, and thus new product
  - Technical documentation and Declaration of Conformity
  - Energy label
  - RoHS, LVD, EMC, ecodesign
  - Manufacturers information

Lot of requirements to fulfill for one unit
Used computers from the online store

The second-hand computers and used corporate laptops sold by Machines Kiertoon Oy are, as a rule, highly reliable computers with a clearly sturdier structure than a normal consumer laptop. They are efficient and long-lasting, and our maintenance has checked all laptops to work.

Used computer for student - Abitti compatibility

Most of the used computers on sale are Abitti compatible laptops. A used laptop is often a very sensible and ecological option for the student – you will get a powerful, reliable and compatible computer at a much lower cost than the corresponding new machine. For example, different versions of Lenovo Thinkpad computers are very popular laptops for matriculation examinations, as is HP’s EliteBook series.

• Changes to software and/or hardware -> new product
In conclusion

• How to make sure, that requirements promote the aims of circular economy, but are still reasonable and surveilable?

• How to tackle the problem related to old product becoming a new product? (without creating big loopholes)
Thank you for listening!