



**Declaration of no competing existing take-back systems**

## Version sheet

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14-08-2025	1.0	Fulco Rouwhorst	Document created
14-09-2025	1.1	Sicco Ouwersloot	Document modified
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# Declaration of no competing existing take-back systems

## 1. Purpose of the Statement

This statement defines Reuzado's obligations regarding product collection activities and their relationship with existing mandatory or regulatory take-back systems. It ensures compliance with Extended Producer Responsibility (EPR) legislation, circular economy principles, and Reuzado's Code of Conduct.

## 2. Definitions

**Mandatory or Regulatory Take-Back System:** A system established by law or regulatory authority, including Extended Producer Responsibility (EPR) schemes, Producer Responsibility Organizations (PROs), or government-approved collection infrastructures.

**Functional System:** A system that is fully operational, compliant with legal requirements, and has sufficient capacity to collect, sort, reuse, refurbish, or recycle the relevant product categories.

**Approved Collector:** A Reuzado-authorized collector, subcontractor, or partner who has passed KYC screening, due-diligence assessment, and compliance onboarding.

**Second-Hand Market Price:** The typical resale value of a product in the geographic area where it is collected, determined using local resale platforms, wholesale used-device markets, refurbisher price lists, or recognized valuation tools.

**No Longer Relevant for Use (End-of-Use Definition):** A product qualifies only for recycling if it meets one or more objective criteria: non-functional, technically irreparable, economically irreparable (repair exceeds 70% of resale value), presents safety risks, cannot undergo secure data erasure, or has negligible market demand.

## 3. Non-Interference with Existing Take-Back Systems

Reuzado will not compete with, replace, or undermine any functional mandatory or regulatory take-back system. Reuzado will not collect products that must enter an official EPR/PRO system nor offer incentives that distort product flows. Reuzado operates only in strictly complementary roles.

## 4. Complementary Activities and Circularity

Reuzado may operate complementary activities only if they do not conflict with regulated systems, demonstrably improve circular outcomes such as reuse, maintain full traceability, and do not disrupt local second-hand markets.

## **5. Audit-Proof Recycling Eligibility Requirement**

Only products meeting the 'No Longer Relevant for Use' definition may be recycled. To prevent premature recycling, the approved collector must offer a purchase price lower than the prevailing second-hand market price for the same product type in the region.

Collectors must maintain documentation including market price evidence, device eligibility classification, and serial-number-level traceability. Records must be retained for a minimum of five years.

## **6. Compliance, Oversight, and Due Diligence**

Reuzado ensures compliance through ongoing legislative review, internal and third-party audits, grievance mechanisms, and corrective actions. Any deviation must be reported through the Concern & Complaint Submission Form and the Whistleblowing Policy.

## **7. Commitment to Responsible and Circular Practices**

This statement reinforces Reuzado's mission to maximize reuse and minimize environmental harm while respecting statutory take-back obligations. Product collection must always be safe, lawful, traceable, and aligned with circular economy principles.

## **References & Hyperlinks**

### **Concern & Complaint Submission Form:**

<https://reuzado.nl/app/uploads/2025/11/Concern-Complaint-Submission-Form.pdf>

### **Whistleblowing Policy:**

<https://reuzado.nl/app/uploads/2025/11/Whistleblowing-Policy.pdf>

### **Code of Conduct (COC):**

<https://reuzado.nl/app/uploads/2025/11/Code-of-Conduct-Policy.pdf>

### **Know your counterparty (KYC) policy:**

<https://reuzado.nl/app/uploads/2025/11/Know-Your-Counterparty-KYC-Policy.pdf>