

EWRN



**european weee
registers network**

EWRN Position Paper

A harmonised definition of weight of electrical and electronic equipment placed on the market (Article 7 (5) Directive 2012/19/EU)

20. January 2014

1 European WEEE Registers Network (“EWRN”)

EWRN is an independent network of national registers at the heart of the national implementation of Directive 2002/96/EC (“WEEE1”) in the respective EU Member States and the new Directive 2012/19/EU (“WEEE2”). Those responsible for managing the national registers are working together as experts regarding electrical and electronic equipment (“EEE”) and its proper treatment. Its primary objectives include promoting a harmonised approach to registration, reporting and scoping issues across the Member States.

2 Current situation under WEEE1

WEEE1 does not define or specify how to quantify the weight of EEE placed on the market. It is a competitive issue if the EEE weight is defined differently among producers, but also across the Member States.

First of all, producers must provide different weights for the same EEE in every Member State to comply nationally. Second, the Key Performance Indicators (national statistics) become incomparable because of the inconsistent calculation of weight.

Therefore EWRN targeted this problem and found consensus on a definition for input weight of EEE which was adopted in 2007.¹

3 WEEE2 – what criteria is relevant for the “weight of EEE”?

EWRN highly appreciates that WEEE2 focuses on a harmonised definition of “weight of EEE” under Article 7 (5) and in the preamble under no. 29.

Under this regulations the Commission shall, by 14 August 2015, adopt implementing acts establishing a common methodology for the calculation of EEE placed on the national market. The methodology for the calculation of weight of EEE shall ascertain, inter alia, what specific items shall be calculated of “weight of EEE” and which not.

The criteria mentioned in the preamble no. 29 shall be verified by the Commission if it is sufficient for the calculation of “weight of EEE” or if it has to be further specified by the Commission.

Some criteria mentioned in the preamble no. 29 differ from the criteria and weight definition adopted by several Member States participating in the standardisation of producer registration and reporting proposed by EWRN.

The difference is that **all accessories**, whether they are electrical/electronic or not, are mentioned in the preamble no. 29 **WEEE2** but **not under WEEE1**².

¹ Digital Europe (formerly EICTA) in May 31, 2006 in a letter to Mr. Timo Mäkelä, Director of Directorate-General Environment suggested to the Commission and Member States that a common weight definition was applied. The suggested definition is equal to the one applied by EWRN.

² Due to the current weight definition applied via EWRN and producers.

Criteria mentioned in WEEE2	EWRN proposal
Actual weight of the entire equipment in the form in which it is marketed,	Gross (shipping) weight of the product
<u>including all</u> <ul style="list-style-type: none"> • components, • sub-assemblies, • accessories and • consumables 	<u>including all</u> <ul style="list-style-type: none"> • electrical and electronic accessories
<u>but excluding</u> <ul style="list-style-type: none"> • packaging, • batteries, • instructions for use and manuals. 	<u>but excluding</u> <ul style="list-style-type: none"> • packaging, • batteries / accumulators, • instructions, manuals • non-electrical/electronic accessories, • consumables.

Note: highlighted in yellow are the differences.

EWRN recommends the clarification of the criteria mentioned in preamble no. 29 for the definition of weight for EEE as proposed by EWRN for the Commission's implementing acts. That would ensure that only products are considered relevant for the calculation of weight of EEE when they are EEE and that they follow only then the WEEE waste stream.