



*Brussels, 3<sup>rd</sup> January 2017*

## POSITION PAPER

### COMMISSION IMPLEMENTING REGULATION

**establishing a common methodology for the calculation of the weight of electrical and electronic equipment (EEE) placed on the national market in each Member State and a common methodology for the calculation of the quantity of waste electrical and electronic equipment (WEEE) generated by weight in each Member State**

*CECED and the WEEE Forum welcome the opportunity of the public [online](#) consultation to provide comments on the new version of the draft implementing regulation and annexes. CECED and the WEEE Forum already provided DG Environment with some comments and amendment proposals in June 2015 and would like to reiterate some of them.*

#### **DEFINITION OF WEIGHT OF EEE (ARTICLE 2)**

**We believe that the Commission Implementing Regulation should be clarify that the definitions provided in Article 2 apply to both household and professional EEE.**

#### **CALCULATION OF THE WEIGHT OF EEE PLACED ON THE MARKET OF A MEMBER STATE (ARTICLE 3)**

**We welcome the changes made by the Commission compared to the 2015 draft version.** It is important that quantities are counted based on real, accurate and sound data as reported by EEE manufacturers to national registers. Only in case available data is not considered accurate enough, should Member States have the option to estimate the quantities of EEE placed on the national market using the methodology set out in Annex I.

Ideally, Member States should notify the European Commission about their choice of calculation methodology, i.e. based on national registered data or estimates in accordance with the methodology set out in Annex I. When a Member State opts to use “the methodology”, appropriate justification should be provided to the Commission in the form of surveys, audit results or consultation with relevant stakeholders.

Regardless of the method used to calculate the weight of EEE placed on the market at national level, Member States should make their choice publicly available, together with the collection targets in case Member States opt to calculate them based on the quantities of EEE put on the market (POM).

## CALCULATION OF THE TOTAL QUANTITY OF WEEE GENERATED IN A MEMBER STATE (ARTICLE 4 AND ANNEX II)

We very much appreciate the changes brought into the wording of the discard-based lifespan profile for the batch of EEE placed on the market in year ( $L^{(p)}(t,n)$ ). The use of the wording “discard rate” is more suitable than the 2015 wording proposal.

**Making both the electronic tool and the lifespan data sitting in the electronic tool available to relevant stakeholders is key to ensuring accuracy of the data and alignment with estimated calculations.** CECED and the WEEE Forum would welcome the feasibility of setting a period or a demonstration for stakeholders and experts to test and evaluate the electronic tool.

It is key that lifespan data at national level are frequently revised to ensure that lifespan profiles embedded within the electronic tool reflect the real technology and socio-economic developments within the Member State.

**We find it positive that the European Commission added point 5 in Annex II (methodology for the calculation of the total quantity of WEEE Generated in a Member State):** *“Before proceeding with such updates, Member States shall inform the Commission thereof and shall provide relevant evidence for such updates, including official market surveys, audit results or analysed and substantiated data resulting from consultation of relevant stakeholders”.*

It is a clear improvement and gives a clear message for transparency of the process at Member State level and the need for evidence backing the changes prior to the update. **This could be further improved by making the lifespan data and profiles publicly available. We appreciate that the collaboration of national authorities and relevant stakeholders at national level is crucial on this dossier, as this can only improve data quality.**

In addition, Annex II of the draft Implementing Regulation says: *“In the tool, data of EEE placed on the market from 1980 up to 2012 and product lifespan for the period 1980-2030 have already been provided.”* To ensure transparency, data should be made publicly available.

Finally, calculations should be made with minimum additional bureaucracy for producers, *directly or indirectly*. Member States oversee reporting and may use the UNU-Keys. For Producers, there is no obligation to report the EEE (POM) in the methodology of UNU-Keys (article 3 (1) “Draft IA-Working Document-Stakeholders’ consultation”): It shall be transmitted by *category* of EEE). The Commission should be aware<sup>2</sup> that a registration by producers with consideration of the UNU-Keys would have adverse effects for producers and mean additional efforts and costs in data management. For example, dryers refer to UNU-Key 0105, but heat pump dryers to UNU-Key 0112. Also, regarding the calculation of WEEE Generated there is no obligation for producers to report output data by using the UNU-Keys. Member States have three different possibilities to enter the annual input data on EEE POM: 10 categories, 6 categories or UNU-Keys (Annex II “Draft IA-Working Document-Stakeholders’ consultation”).

CECED and the WEEE Forum would like to reiterate our request to make available the electronic tool and lifespan data to relevant stakeholders, and take the remaining comments into account.

**CECED** represents the home appliance industry in Europe. The total annual turnover of the industry in Europe is €50bn. Total employment as a result of the presence of the sector is approximately 1 million jobs. The sector contributes €1.4bn to research and development activities in Europe. Direct Members are Arçelik, Ariston Thermo Group, BSH Hausgeräte GmbH, Candy Group, Daikin Europe, De'Longhi, Dyson, AB Electrolux, Gorenje, Indesit Company, LG Electronics Europe, Liebherr Hausgeräte, Miele & Cie. KG, Panasonic, Philips, Samsung, Groupe SEB, Vestel, Vorwerk and Whirlpool Europe. CECED's member Associations cover the following countries: Austria, Baltic countries, Belgium, Bulgaria, Czech Republic, Denmark, France, Germany, Greece, Hungary, Italy, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom.

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The **WEEE Forum** is a European not-for-profit association speaking for 30 electrical and electronic equipment waste (WEEE) producer compliance schemes – alternatively referred to as 'producer responsibility organisations' (PRO). It was set up in 2002. The 30 PROs are based in Austria, Belgium, Czech Republic, Denmark, Estonia, Italy, Greece, France, Ireland, Lithuania, the Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland and the United Kingdom. It is the biggest organisation of its kind in the world. In 2015 its member organisations reported collection and proper de-pollution and recycling of more than 1.88 million tonnes of WEEE. Members in 2016: Amb3E, Appliances Recycling, Asekol SK, EÅF, Ecodom, Eco-systèmes, Ecotic, Eco Tic, EES-Ringlus, EGIO, ElektroEko, Elektrowin, El-Kretsen, elretur, el retur, Environ, Fotokiklosi, Recupel, ReMedia, Renas, Repic, Retela, RoRec, SENS, SWICO, UFH, Wecycle, WEEE Ireland, WEEE Malta and Zeos.

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