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JOINT INDUSTRY STATEMENT ON WEEE SCOPE

The Trade Associations COCIR, DIGITALEUROPE, ELC and TechAmerica Europe call on the representatives of the Member States in the Council to reconsider the current proposal of reducing the number of product categories within the scope of the WEEE Directive. We strongly support maintaining the 10 categories from the current WEEE Directive.

We support the objective of the WEEE Recast to reduce the administrative burden and improve the legislative operational fit. Reducing the categories of the WEEE Directive would create a massive administrative burden, and would be a barrier to innovation as advances in recycling technology could change the required collection groups in order to optimize recycling and provide purer recyclates.

A 5 category scope will create a massive administrative burden with no obvious benefits.

- Producers will have to verify products according to their length, height and width or their weight.
- All producers will have to adapt their reporting on products put on the market changing their IT and accounting systems.
- Some producers will have to report their products in more categories than before.

This increase in administrative burden is in direct conflict with the objectives of the WEEE Recast.

A 5 category scope is not enough flexible to match with constant evolution in recycling technology.

- Advances in recycling technologies could change the required collection groups in order to optimize recycling and provide purer recyclates.
- It is vital that the collection groups can adapt to future changes.
- Waste streams need to be organised in such a way that they can be adapted according to the conditions in material value and scarcity as well as recycling technology.

Producers favour retaining a 10 category scope because:

- It is a well-established and working system, deployed since 2005 in all EU countries.
- It will ensure consistency with the RoHS Directive and minimise the need for further discussions on exemptions, definitions and guidance.
- It will avoid the disruption of Member States' registration systems.



Industry jointly urges the Council to seriously consider the potential consequences that will affect not only industry but also organizations/authorities at local level in case the 5 category approach is preferred to the already well-established 10 categories one.



ABOUT DIGITALEUROPE

DIGITALEUROPE is the voice of the European digital economy including information and communication technologies and consumer electronics. DIGITALEUROPE is dedicated to improving the business environment for the European digital technology industry and to promoting our sector's contribution to economic growth and social progress in the European Union.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 57 global corporations and 37 national trade associations from across Europe. In total, 10,000 companies employing two million citizens and generating €1 trillion in revenues. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

ABOUT COCIR

COCIR represents the radiological, electromedical and healthcare IT industry in Europe. As such, COCIR members play a driving role in developing the future of healthcare both in Europe and worldwide.

ABOUT ELC

ELC members include the leading eight European lamp manufacturers. These companies account for 95% of total European lamp production, employ more than 50.000 people in Europe, and generate more than 5 billion Euros turnover annually.

ELC objectives are to promote efficient lighting for the benefit of the global environment, human comfort and the health and safety of consumers; to monitor, advise and cooperate with EU decision makers in developing legislation of relevance to the European lighting industry; to act as key discussion partner with representative organizations of the lighting value chain on all topics regarding light sources".

ABOUT TECHAMERICA EUROPE

TechAmerica Europe (formerly AeA Europe) represents leading European high-tech operations with US parentage. Collectively we invest Euro 100 bn in Europe and employ approximately 500,000 Europeans. TechAmerica Europe Member companies are active throughout the high-technology spectrum, from software, semiconductors and computers to Internet technology, advanced electronics and telecommunications systems and services. Our parent company, TechAmerica (formerly AeA and ITAA), is the oldest and largest high-tech association in the US.