

*The Secretary General*

Mr Timo Mäkelä  
Director  
DG Environment  
European Commission  
Rue de la Loi 200  
B-1049 Brussels

Brussels, 4 August 2006

**Directive 2002/96/EC (WEEE)  
Information gathering exercise**

Dear Mr Mäkelä,

Orgalime<sup>1</sup> has the pleasure of submitting to you in the attachment its contribution to the above-mentioned consultation. This input is based upon the experiences and information of the WEEE Forum and represents the input that has been possible to consolidate given an extreme short consultation deadline.

At this stage, the operational status of WEEE systems in the various EU member states differs vastly: while four member states already had WEEE systems operative (for certain categories) before the WEEE directive entered into force<sup>2</sup>, a number of other member states either have just started their operational take back schemes<sup>3</sup> or will yet have to get operative<sup>4</sup>. Due to delays in transposition and implementation of the directive, there is to date very limited experience or feed back on practical operations.

For this reason, the submitted information relates to the countries where systems already operate, including two Non-EU member states Switzerland and Norway. It can therefore only provide a picture of the situation in these countries and cannot be considered as providing a representative compilation of data that can be extrapolated as such across EU member states as a whole.

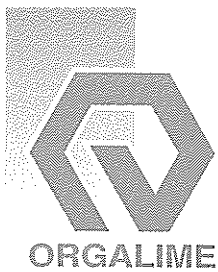
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<sup>1</sup> **ORGALIME** speaks for 35 trade federations representing some 130,000 companies, the vast majority of which are SMEs, in the mechanical, electrical, electronic and metalworking industries of 24 European countries. These industries employ some 10 million people and account for 1698 billion Euro of annual output, which is over a quarter of the EU's output of manufactured products and a third of the manufactured exports of the European Union.

<sup>2</sup> Austria, Belgium, Netherlands and Sweden

<sup>3</sup> For example: Czech Republic, Finland, Germany, Ireland, Luxembourg, Slovakia, Spain (partly depending on autonomous region)

<sup>4</sup> For example: France, Italy, Malta, Poland, UK, Denmark (with exception of systems for certain small appliances WEEE that operated before)



Orgalime underlines also that the existing collective systems, that group themselves in the WEEE Forum, handle different product categories and do not necessarily systematically follow the categories given by the WEEE directive. This clearly has an impact on the interpretation of any data.

When analysing *data related to collected amounts of WEEE*, one must further recognise that a number of important aspects (such as the question of "ownership" of WEEE, area coverage and convenience or awareness of consumers of WEEE collection and collection facilities) need to be taken into account to properly understand the data.

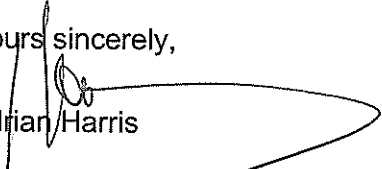
When considering *data related to costs*, it is important to note that such data are divided into *operational costs* (spent by WEEE systems for collection, containers, transport or treatment) which are quantified in the attached document and *additional costs* (costs of the WEEE systems for other responsibilities potentially taken over, such as remunerations for distribution chain, technical controls of collection facilities, PR and awareness building, R&D or special costs for sorting or sampling). Those are not quantified in the attached document. Apart from these costs that occur as contributions to the WEEE systems, additional costs arise for various stakeholders, including companies or member states (e.g.: registration fees, costs for free rider control or human resources in companies to implement WEEE), which are not further quantified in the attachment.

Orgalime will be happy to follow up this initial data information gathering contribution by providing both updated data as this becomes available to us, as well as through publishing a position paper which we are preparing on the issues that should in our view be addressed at the upcoming WEEE review in 2008 in the context of the Commission's simplification programme.

We remain available for any further information that you may wish to obtain.

We are addressing a copy of the present letter and its annex to your colleagues in DG Enterprise and Industry.

Yours sincerely,

  
Adrian Harris

Annex: WEEE forum figures

Cc:

DG Environment

Mr Kögler, Mr Van der Herten, Ms Passera, [env-weee@ec.europa.eu](mailto:env-weee@ec.europa.eu)

DG Enterprise and Industry

Mr Koopman, Mr Weissenberg, Mr Catinat, Mr Montoya, Ms Spiliopoulou-Kaparia, Mr Pinelli, Mr Eifel