

**Brussels, 1 February 2011**

## **RECOMMENDATIONS FOR EP PLENARY VOTE ON WEEE RECAST**

On 3 February 2011, the European Parliament will vote on the Draft Florenz Report on the proposal for a recast Directive on Waste Electrical and Electronic Equipment (WEEE).

European Electrical and Electronic Equipment manufacturers represented by Orgalime support the objectives of the WEEE Directive and its recast in order to improve the workability and environmental benefits of the Directive while cutting unnecessary administrative burden and costs.

The Draft Report of Rapporteur Karl Heinz Florenz as voted by the Environment Committee contains a number of valuable improvements in these directions, such as proposals for:

- An ambitious while realistic collection rate based on WEEE generated
- A concise set of scope exclusions defined in line with other existing EU legislation
- Requiring responsible action by all actors that intervene in the WEEE chain and multi-stakeholder process of WEEE management in practice
- Better harmonised registration and reporting formats for electronic registration or the clarification that it is not necessary for a company to have a legal seat in each Member State
- A WEEE resident agent for the purpose of strengthening enforcement, or
- Drying out illegal flows and shipments of WEEE and strengthening the possibilities of enforcement

**We therefore request Members of the European Parliament to support the following amendments: 1-6, 9, 11, 13-17, 18-23, 25, 26, 28-31, 33, 37, 49, 50, 55, 57-60, 68, 71-74, 80, 93, 99, 105 and 106.**

At the same time we object to a number of proposed amendments, which, if finally adopted, would not contribute to the effectiveness of the Directive but render its application more complex and costly for industry without demonstrated environmental benefit. Such proposals include in our view the following:

- An open scope which brings in a vast range of professional goods into what is essentially a directive dealing with household waste in the absence of an EU impact assessment and sufficient knowledge on the consequences
- Five new scope categories instead of the existing ten categories and illustrative product lists that can never be complete or follow technological developments in time

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*Orgalime, the European Engineering Industries Association, speaks for 32 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 22 European countries. The industry employs some 10.6 million people in the EU and in 2009 accounted for some €1,427 billion of annual output. The industry not only represents more than one quarter of the output of manufactured products but also a third of the manufactured exports of the European Union.*

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- The extension of producer responsibility to the financing of collection from private households
- Too descriptive ways of how to organise WEEE take back in practice, especially for very small volume wastes via distributors
- Tackling nanomaterials under WEEE instead of REACH.
- Restricting legal shipments of used EEE for the purpose of repairing, refurbishing, reprocessing or analysing professional goods to the warranty period (note: lifetime is longer than warranty period).

**We therefore request Members of the European Parliament to reject the following amendments: 7, 12, 24, 27, 32, 39-44, 46, 47, 51-53, 54, 56, 61, 67, 75, 78, 79, 86, 89, 90, 91, 92, 97, 98, 100, 101, 102, 103 and 107.**

We kindly request Members of the European Parliament to take these recommendations into account in order to secure the significant investments made by our industry in setting up WEEE management structures in record time while at the same time strengthen the environmental performance of the Directive, its workability and proportionality in line with Better/Smart Regulation principles.



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*The European Engineering Industries Association*

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