

Brussels, 6 March 2015

Response to the TRASYS questionnaire on the harmonisation of the format for registering and reporting to the WEEE register(s)

Orgalime thanks TRASYS for the invitation to comment on the study carried out on behalf of the European Commission in the context of the implementation of article 16(3) of Directive 2012/19/EU on Waste Electrical and Electronic Equipment ("WEEE2"). Following this provision the Commission should adopt implementing acts establishing **the format for registration and reporting and the frequency of reporting to the WEEE register**.

Most of the questions of the TRASYS stakeholder questionnaire are targeted to the national level. We therefore would like to raise our remarks and suggestions in this form and also include our answers to the few more horizontal stakeholder questions directly in here:

1. A proper implementation of article 16(3) WEEE will facilitate companies' compliance efforts

Orgalime believes that shaping the implementation of WEEE registration procedures in terms of establishing a harmonised format for registration and reporting as well as a common understanding on the frequency of reporting can contribute to cutting unnecessary administrative burdens and costs for companies. It thereby facilitates companies' compliance efforts and supports the workability of the Directive on the ground in line with Better Regulation, which we welcome.

Throughout the recast of the Directive, Orgalime supported the following objectives for shaping registration under WEEE:

- To keep the administrative burdens related to registration at national level at the minimum necessary to secure the enforceability of the directive and to avoid free-riding.
- To ensure national registers better exchange information, including on the quantities of EEE annually placed on their national market and on "WEEE generated".
- To better harmonise registration and reporting procedures, in particular through the establishment of a harmonised format for electronic online registration.

We still advocate for these objectives. In particular, harmonising the registration and reporting procedures of the WEEE register can help to alleviate the current hurdles related to implementation of the Directive, such as the following:

- Since 2002, the WEEE Directive has led to fragmentation of the internal market of EEE and created significant administrative burdens for companies active in several Member States. Companies have been obliged to invest in reporting processes to account for national differences, in areas such as requirements for registration, reporting deadlines and required

Orgalime, the European Engineering Industries Association, speaks for 41 trade federations representing some 130,000 companies in the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries. The industry employs some 10 million people in the EU and in 2013 accounted for more than €1,700 billion of annual output. The industry accounts for over a quarter of manufacturing output and a third of the manufactured exports of the European Union.

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data. This has been a time consuming and costly process and burden for companies, especially SMEs.

- The scope of the WEEE2 Directive continues to be interpreted differently among Member States, which impacts reporting obligations and the results of registration and reporting in terms of comparability of data. There are not only different assessment of products in or out of scope (and accordingly reported or not), but also differences in identical products being allocated to different categories, national subcategories in the different Member States. We also notice there are different interpretations of “private household equipment” and “other private household equipment”.

2. The way forward

We support the objective of article 16(3) of the Directive and ongoing implementation work towards harmonising registration and reporting procedures and frequencies.

At the same time, implementation of WEEE2 is progressing at the national level and such harmonisation should better “work with the present” and be built on national best practices rather than being reinvented from scratch.

With this in mind, we refer to the work done by the European WEEE Registers Network (EWRN - www.ewrn.org) in the following areas, which often ties in with our own assessments:

- the information provided by the EWRN overview on who is in charge of registration to the national registers, which varies in Member States (referring to TRASYS question 37),
- the information provided by the EWRN regarding reporting obligations (referring to TRASYS question 39) and
- the EWRN proposal for a harmonised format for registering and reporting, which should serve as a starting point for the European way forward with article 16(3) WEEE2.

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