

One-Stop-Shop for your compliance



WEEE Europe
A solution also for B2B
producers

Dublin, 9 October 2018





Agenda

1. WEEE Europe

- Services and structure

2. WEEE Recast and “Open Scope”

- Producers concerns
- Summary of actual situation

3. What are the products in scope?

- The exception approach
- LSSIT and LSF1
- What to declare?
- FAQ and EWRN guidance documents
- Industry associations position papers and local registers

4. Others

- Batteries used in open scope EEE

WEEE Europe

- Assessment and consulting based on producer portfolio and sales channel
- Contract handling for EEE and batteries
- Product allocation to local categories
- Centralized reporting tool for PoM
- Services for EU 28, Switzerland & Norway



UFH Austria	Recupel Belgium	elretur Denmark	zentek Germany
elker Finland	Eco-systemes France	REPIC Great Britain	WEEE Ireland Ireland
Remedia Italy	wecycle Netherlands	NORSIRK Norway	ElektroEko Poland
ECOTIC Romania	El-Kretsen Sweden	SONS eRecycling Switzerland	SWICO Switzerland
asekol Slovakia	ecotic Spain	asekol Czech Republic	

- ✓ The best Take Back Schemes in Europe in a One Stop Shop approach
- ✓ Centralized professional competence supported by local know-how
- ✓ Non for profit
- ✓ 50% of the European E-waste treated through WEEE Europe Partners (≈ 1,5 Mio tons per year)



WEEE Recast and “Open Scope”

- A **fundamental change of legislation** went into force in August 15
- **10 categories** were replaced by **6 new ones**
- **All electrical Products in scope**, if not subject to an exemption
- **Producers are responsible to proof** that they are not affected



**European
WEEE Directive
2012/19/EU**



Recurrent producers concerns

- **What changes need to be expected?**
 - How is the **reporting structure** changing in the countries?
 - What **price changes** are to be expected?
 - As of when will changes be applicable?
- **What products will come into scope?**
 - There will be a common understanding on products?
 - Is there any guidance available in the countries to support?
- **How can WEEE Europe partners support in the actual collection and recycling of B2B appliances?**
 - How does the process work behind B2B?

6 Categories introduction according to local legislation

1 Jan 2018	1 July 2018	15 Aug 2018	1 January 2019	n/a
Bulgaria Hungary Poland Slovenia	Latvia	Remaining 21 countries	Sweden* UK	Switzerland Norway**

* Initially planned on 15 Aug

** Foreseen on the law but open date

Open Scope - Price lists structures

	6 Cat	Dedicated B2B prices
AT	Yes	Yes
BE	No	One list, different codes
CH	n/a	n/a
CZ	No	No
DK	No	No
ES	No	One list, different codes
FI	Yes	Yes
FR	No	Yes
DE	Yes	Charged on real costs

	6 Cat	Dedicated B2B prices
IE	No	n/a
IT	No	Charged on real costs
NL	No	One list, different codes
NO	n/a	No
PL	Yes	No
RO	No	No
SK	No	No
SE	No	n/a
UK	No	Charged on real costs



What are the products in scope?

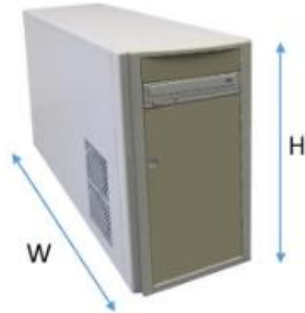
6 Categories - as from 15.08.2018

1. Temperature Exchange Equipment
2. Screens, Monitors and equipment containing screens having a surface greater than 100 cm²
3. Lamps
4. Large Equipment (any external dimension > 50 cm)
5. Small Equipment (\leq 50 cm)
6. Small IT and telecommunication equipment

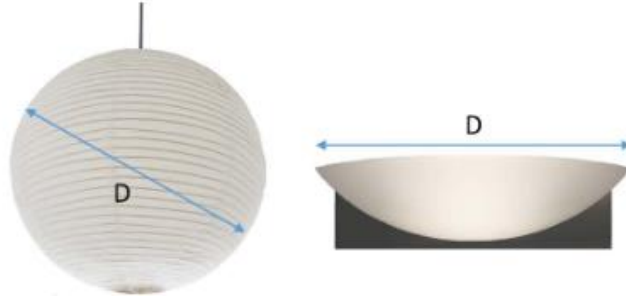
Large or small equipment?



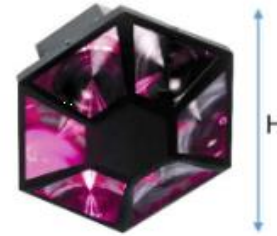
Measurement examples



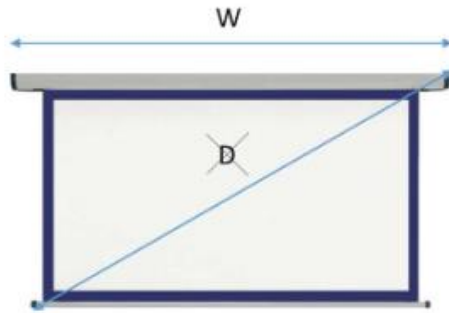
Tower PC
External dimension:
the larger value of H or W



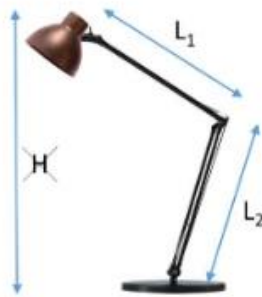
Round equipment
External dimension:
diameter D



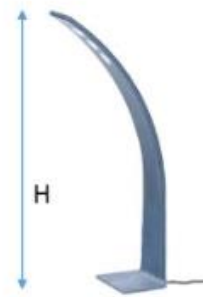
LED colour organ
External dimension:
value H



Motorised projector surface
External dimension:
value of W, (not value D)



Luminaire (articulated)
External dimension:
the larger value of L_1 or L_2 ,
(not value H)



Luminaire (not flexible)
External dimension:
value of H



Vacuum cleaner
External dimension:
value of H (without hose
and floor head)

<https://www.ewrn.org/publications-events/publications/new-weee2-exclusions>

What are the products in scope?

✓ **All!**

... with some listed exemptions

Which exemptions exist?



Article 2.3 WEEE Directive:

- a) equipment which is necessary for the protection of the essential interests of the security of Member States, including arms, munitions and war material intended for specifically military purposes
- b) equipment which is specifically designed and installed as part of another type of equipment that is excluded from or does not fall within the scope of this Directive, which can fulfil its function only if it is part of that equipment
- c) filament bulbs



Which exemptions exist?

Article 2.4 WEEE Directive:

- a) **equipment designed to be sent into space** 
- b) **large-scale stationary industrial tools**
- c) **large-scale fixed installations**, except any equipment which is not specifically  designed and installed as part of those installations
- d) **means of transport for persons or goods**, excluding electric two-wheel vehicles which are not type-approved
- e) **non-road mobile machinery** made available exclusively for professional use
- f) equipment **specifically designed solely for the purposes of research and development** that is only made available on a business-to-business basis
- g) **medical devices and in vitro diagnostic medical devices**, where such devices are expected to be infective prior to end of life, and active implantable medical devices

Large Scale Stationary Industrial Tools (LSSIT)

Drilling machines - both in scope...?



...or exempted as
LSSIT?

Large Scale Stationary Industrial Tools (LSSIT)

The definition of LSSIT consists of three specific prerequisites:

- (i) assembly of machines, equipment, and/or components, functioning together for a specific application (“**tools**”);
- (ii) permanently **installed and de-installed by professionals at a given place** and used and maintained by professionals in an industrial manufacturing facility or research and development facility;
- (iii) and **large size**.

⇒ *All three prerequisites must be met for the exclusion to apply!*

Since there is no metric guidance that defines “large-scale” subject to LSSIT, EWRN proposes to introduce the following metrics as an orientation:

- (i) Weight: **more than 2 tons**
- (ii) Volume: **minimum of 15,625 m³ (e.g. 2,5 m x 2,5 m x 5 m)**

Both metrics must be met!

Large Scale Fixed Installation (LSFI)



Is this an LSFI?




Large Scale Fixed Installation (LSFI)

LSFI means a large size combination of several types of apparatus and, where applicable, other devices, which:

(i) Large size (if **at least one** of the criteria is met):

- a. Weight more than 44 Ton;
- b. Larger than 5,71m x 2,35m x 2,39m (length, height and width);
- c. Heavy-duty cranes are needed for installation or de-installation;
- d. Building needs structural modification 
- e. Rated power greater than 375 kW. 

(ii) are assembled, installed and de-installed by professionals,

(iii) are intended to be used permanently as part of a building or a structure at a pre-defined and dedicated location, 

(iv) can only be replaced by the same specifically designed equipment. 

LSFI vs LSSIT ?



Automated welding cell:

Robot arm

Welding machine

Smoke exhauster

Protection screens

Welding jig

Explanations related to the exemptions

FAQ WEEE2 /

FAQ RoHS2 /

EWRN Position Papers

RoHS 2 FAQ

PREFACE

1. GENERAL

- Q1.1 WHAT WAS THE INTENTION BEHIND THE RoHS-RECAST?
- Q1.2 WHAT IS THE DIFFERENCE BETWEEN DIRECTIVE 2002/95/EC (RoHS 2011/65/EU (RoHS 2)?
- Q1.3 WHEN DO THE NEW PROVISIONS OF RoHS 2 APPLY?
- Q1.4 WHY ARE THE HAZARDOUS SUBSTANCES RESTRICTED IN RoHS 2 ALL PRODUCTS?
- Q1.5 HOW ARE REACH AND RoHS 2 RELATED TO EACH OTHER?
- Q1.6 ARE BATTERIES WITHIN THE SCOPE OF RoHS?
- Q1.7 HOW CAN I FIND OUT IF RoHS 2 APPLIES TO MY PRODUCT?
- Q1.8 WHERE CAN I ASK QUESTIONS ABOUT THE PROVISIONS OF RoHS 2?

2. SCOPE - ARTICLE 2(2)

- Q2.1 WHAT DOES "WITHOUT PREJUDICE TO ARTICLE 4(3) AND 4(4), SHALL PROVIDE THAT EEE THAT WAS OUTSIDE THE SCOPE OF DIRECTIVE WHICH WOULD NOT COMPLY WITH THIS DIRECTIVE, MAY NEVERTHELESS MADE AVAILABLE ON THE MARKET UNTIL 22 JULY 2019" MEAN?
- Q2.2 WHICH PRODUCTS BENEFIT FROM THIS PROVISION? (ARTICLES 2(2) 4(3), 4(4))
- Q2.3 WHAT DOES "MAKING AVAILABLE ON THE MARKET" MEAN II (ARTICLES 2(2), 3(1), 3(12))

3. SCOPE - LARGE-SCALE EXCLUSIONS


- Q3.1 WHAT ARE "LARGE-SCALE STATIONARY INDUSTRIAL TOOLS" AND "L INSTALLATIONS"? (ARTICLES 2(4)(b) AND 2(4)(e))
- Q3.2 DOES THE LSSIT/LSFI SCOPE EXCLUSION ALSO COVER EQUIPMENT TELECOMMUNICATION EQUIPMENT, MEDICAL DEVICES OR INDUSTRIAL CONTROL INSTRUMENTS?
- Q3.3 WHO IS RESPONSIBLE FOR ITEMS THAT ARE TO BE USED IN LSSIT/LI?

4. SCOPE - OTHER EXCLUSIONS

- Q4.1 WHAT IS MEANT BY "SPECIFICALLY DESIGNED EQUIPMENT" (I ARTICLE 2(4)(d))
- Q4.2 IS R&D EQUIPMENT EXCLUDED FROM RoHS 2?
- Q4.3 ARE EEE BUILT INTO BUILDINGS OUTSIDE OF SCOPE?
- Q4.4 WHAT IS MEANT BY "MULTIPLE" OR "DUAL" USE?
- Q4.5 IF EEE HAS MULTIPLE USES OF WHICH ONE IS IN THE SCOPE OF R EEE HAVE TO COMPLY?


12 December 2012

Frequently Asked Questions
on
Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE)




April 2014

WEEE2 guidance document:
Large-scale fixed installations ("LSFI")



WEEE2 guidance document:
Large-scale fixed installations ("LSFI")
October 2016

WEEE2 guidance document:
Large-scale stationary industrial tools ("LSSIT")



WEEE2 guidance document:
Large-scale stationary industrial tools ("LSSIT")
October 2016

<https://www.ewrn.org/publications-events/publications/new-weee2-exclusions/>

Scope – additional examples...



In scope...?

Components cover the range of items that, when assembled, enable an EEE to work properly.

Components placed on the market separately in order to be used to manufacture and/or repair an EEE fall outside the scope of the Directive unless they have an **independent function** themselves.

Source: FAQ WEEE Directive

Scope – recent cases...



Fuses and fuse holders



Circuit breakers



Residual current circuit breakers RCCB



Cables



Emergency switches



Meters: electricity, water, gas



Printing cartridges

Scope - the details

Germany: the extension cord e.g.



Industry associations

- Some sectorial organisation released recently relevant position papers



EUROPEAN ENGINEERING
INDUSTRIES ASSOCIATION

ORGALIME represents 42 trade federations of the mechanical, electrical, electronic, metalworking & metal articles industries of 23 European countries.



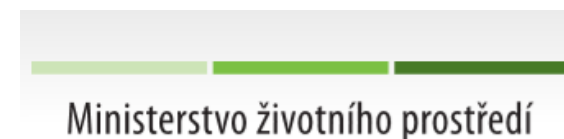
According to the explanation in the FAQ WEEE 2 2012, 3.8, cables are considered in the scope of WEEE 2, if used for the transfer of electric current or electromagnetic fields.



Electrical installation equipment used in residential and commercial buildings fall into the open scope as defined by the WEEE2 Directive

National registers

- How close are the current relations with local register bodies?
Can we benefit from their existing tool for product interpretation?



european weee
registers network



What to declare?



Different approaches found:

- France - No
- Germany - Yes

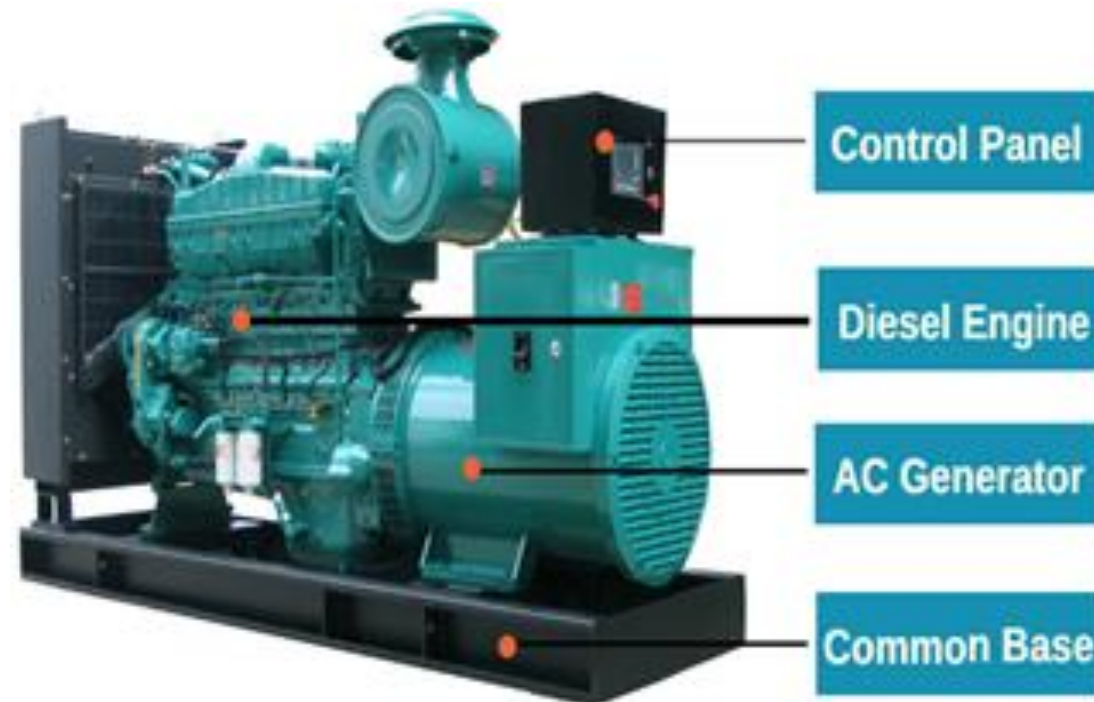
Weight to declare?



Different approaches found:

- Total weight.
- Only electrical related equipment.

(EU regulation 2017/699 18 April 2017 - art. 2a)



EEE also incorporates batteries!

Very often producers are not informed by the schemes also on their battery obligations for their products:

France, Belgium, Netherlands have independent TBS

In some countries foreign producers cannot declare batteries: UK, AT

New EEE and battery limitations

Portable vs industrial (1kg limitation?)

Industrial batteries for UPS inverters

Car starting batteries



One Directive – different implementations

The different implementations challenge producers in three different ways:

1. How do I need to interpret the differences in the countries?
2. How can I ensure compliance in all states as multinational producer?
3. How can I efficiently arrange for the different Put on the Market declarations in the various countries?



...weee can manage challenges together, get in contact for support!



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