

# POSITION PAPER

## Review of Directive 2002/96/EC on Waste Electrical and Electronic Equipment (WEEE)

Brussels, 19 February 2007

### EXECUTIVE SUMMARY

The European Commission has initiated the review process of Directive 2002/96/EC on waste electrical and electronic equipment (WEEE). Orgalime is committed to continuously providing input to the WEEE review process and requests regulators to shape WEEE in a sustainable manner rather than introducing yet further environmental and administrative requirements without considering the competitiveness of European electrical and electronic manufacturers that act globally. Orgalime calls upon the Commission to ensure that the review process (initiated even before the Directive's full implementation at national level) does not lead to a more complex and fragmented regulatory framework for dealing with WEEE. Reviewing the WEEE Directive in 2008 should serve as a **real example of Simplification and Better Regulation**, i.e. cut administrative costs and bureaucratic burden caused by the Directive, improve legal certainty for companies and thereby strengthen the enforcement of the Directive, i.e. Achieving its environmental objectives while not unduly undermining the competitiveness of European producers of EEE.

Orgalime supports addressing the following **priority areas** when reviewing the WEEE Directive:

- In contrast to waste management obligations, **WEEE obligations that concern the placing of a product on the market should be based on article 95 EC Treaty.**
- Industry suggests a **better, more structured and durable dialogue between industry and authorities (including enforcement bodies), which could take the form of a consultative body**, a concept that works well and has proven useful in other Directives.
- **WEEE registration and reporting in member states requires better harmonisation.** In particular, a European mechanism for the cooperation and coordination of WEEE registers with harmonised procedures and reporting systems should be incorporated in the legal text. If the WEEE Directive were not already amended prior to the review, we call upon EU and national regulators to agree upon an interim solution by adopting one harmonised data format for registration and one format for reporting at EU level. Orgalime has tabled respective proposals.
- **The scope of the WEEE Directive requires a certain clarification.** We propose
  - to include the definitions of "fixed installation" and "finished products" in the legal body of the WEEE Directive,
  - to not include further professional goods under WEEE,
  - to clarify the relationship between the WEEE and RoHS Directives by amending the RoHS Directive with an own scope that incorporates the criteria of "fixed installation" and "finished products" directly into the RoHS Directive.
- **The environmental objectives of annex II WEEE on treatment requirements should be re-evaluated against alternative options for realising these objectives**, which would allow annex II to be removed from the Directive.
- **Similarly, the effectiveness of setting recycling/recovery targets should be re-considered against the alternative way forward of setting environmental objectives for recycling/recovery instead of targets.** Any potential shift from waste stream specific to material specific targets, as discussed under the Thematic Strategy on Waste Prevention and Recycling, must not create parallel systems and therefore double costs for EEE manufacturers when managing WEEE. We believe that a "divert from landfill" policy for highly calorific waste should be developed.
- The current "one size fits all" approach of the given **4kg/year/ person collection target** is implemented differently in member states. It would in our view be pre-mature to propose a stricter target prior to all member states reaching the current target.
- **Article 4 WEEE on design should in our view be removed from the Directive** since it has been rendered outdated with the final adoption of Directive 2005/32/EC on eco design requirements for energy using products (EuP) that specifically addresses all environmental aspects from cradle to grave rather than on design for recycling only.
- **Orgalime recommends a re-consideration of the priority that WEEE gives to "re-use"**, especially against the issue of energy efficiency, which regulators have set in parallel as a priority for designing EEE.

**Orgalime calls upon regulators to shape WEEE in a sustainable manner in areas that are not sufficiently clear while at the same time ensuring that member states correct erroneous transpositions that are against the provisions of the WEEE Directive.**

## I. INTRODUCTION

In its Simplification Programme of October 2005, the European Commission has listed Directive 2002/96/EC for simplification. Articles 5.5, 7.4 and particularly 17.5 of Directive 2002/96/EC on Waste Electrical and Electronic Equipment (WEEE) foresee that the directive shall be reviewed in certain areas and that in the context of submitting its implementation report, the Commission shall accompany this report by proposals for revision of the relevant provisions of this Directive.

In the context of preparing for these activities, the Commission has published a consultation document, on which Orgalime provides its comments against the following background:

1. **The surroundings of the WEEE directive today differ significantly from the legislative environment situation at the time of adopting the directive.** In particular, other legislative initiatives that impact the WEEE directive have been finally approved by EU legislators in the meantime (for example: Directive 2005/32/EC establishing a framework for the setting of eco design requirements for energy using products (EuP), the regulation for registration, evaluation and authorisation of chemicals (REACH)). In addition, other legislative acts, that may influence the WEEE directive have been recently revisited or are scheduled for revision shortly, such as Directive 2006/66/EC on Batteries and Accumulators and Waste Batteries and Accumulators and Repealing Directive 91/157/EC or Directive 1996/61/EC on Integrated Pollution, Prevention and Control (IPPC).

**Therefore, Orgalime believes that any review of the WEEE Directive has to be undertaken from this clearly different starting point.** More particularly, we take the view that the background to and lessons learned from changes that have been made to other existing waste stream specific legislation, such as Directive 2006/66/EC on Batteries and Accumulators and Waste Batteries and Accumulators, should be closely examined when discussing any changes to the WEEE Directive.

2. **Since the adoption of the WEEE Directive the European Institutions have also agreed on a policy for Better Regulation and Simplification.** Translated into WEEE, we believe that this would mean focusing on the main aspects of the directive and align them with Better Regulation principles, such as proper impact assessment, less administrative burden and red tape or stakeholder consultation before presenting proposals for revision.
3. **At this moment in time, experience with implementing the WEEE Directive is limited** since few member states have managed to transpose this complex directive in time. The set up of collection and treatment systems in many countries has consequently been delayed.
4. **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>1</sup>, a number of other member states either have just started their operational take back schemes<sup>2</sup> or will yet have to get operative<sup>3</sup>. Due to delays in transposition and implementation of the directive, there is to date very limited experience or feed back on practical operations.
5. **Published data on operating systems and their experiences today can therefore only relate to a limited number of member states** and only provide a picture of the situation in these countries. Such data cannot be considered as providing a representative compilation of data that can be extrapolated as such across EU member states as a whole.

Orgalime underlines also that the existing systems 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 such data.

---

<sup>1</sup> Austria (for cooling and freezing only), Belgium, Netherlands and Sweden.

<sup>2</sup> Czech Republic, Denmark (partly), Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Luxembourg, Portugal, Slovakia and Spain (partly- depending on autonomous region).

<sup>3</sup> Cyprus, Italy (April 2007), Latvia, Lithuania, Malta, Poland (2008), Slovenia, UK (July 2007), Bulgaria and Romania.

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) 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). 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).

Providing **data per WEEE categories** today is difficult and misleading since some products fall under several categories, in almost all member states product categories are collected mixed and some products cannot be clearly identified as either B2B or B2C waste.

## II. THE WAY FORWARD

Orgalime believes that the way forward should be built upon the following principles:

1. The WEEE-Revision should not be considered as a vehicle to correct failures or shortfalls in national transposition laws. Member states have to follow the text of the directive and transposition problems should be solved at national level, with the active encouragement of the Commission. Where national transpositions however have evidenced shortcomings of the WEEE directive itself, due consideration should be given to fine-tuning the directive in such areas at EU level.
2. Prior to considering any strengthening of any legal measure, member states should, in our view, provide evidence that enforcement has been effectively strengthened to avoid free riders.
3. Any proposal for revising the WEEE directive should undergo a proper impact assessment and stakeholder consultation in a transparent way.

## III. PRIORITY AREAS TO BE CONSIDERED FOR FURTHER INVESTIGATION

Based on the above-mentioned background and principles, Orgalime proposes to further analyse the relevance of the following areas for a review of the WEEE Directive:

1. **Orgalime believes that the overriding priority of the scheduled WEEE review should be to provide a solution to internal market issues arising out of WEEE.**
  - More particularly, from our experience with member states transposition process of the directive, we believe that in a number of areas it has become clear that a legal base of art.175 of the EC Treaty only is inappropriate. Considering that WEEE establishes obligations on producers of electric and electronic appliances before placing a product on the Community market in order to finance its treatment end of life, we take the view that where waste policy constitutes product policy, legislative provisions should be built upon art. 95 of the EC Treaty. Such an approach of a dual legal base was recently chosen when revising the existing batteries and accumulators directive.
  - We equally believe that member states transpositions have clearly shown shortcomings of the WEEE Directive in the area of WEEE registers. In particular, we consider it vital to establish a European mechanism for the cooperation and coordination of WEEE registers (e.g.: common procedures and reporting systems) in the legal body of the WEEE Directive. Recent modifications adopted to Directive 2006/66/EC on Batteries and Accumulators and Waste Batteries and Accumulators may serve as a starting point. Achieving this would to our mind show the Commission's real commitment to cutting administrative costs of Community legislation, which is one of the targets that it has set for itself.
  - Transpositions of member states also showed differences on a number of definitions (e.g.: notion of "put on the market" or "the producer"). Orgalime is actively contributing to the ongoing revision process of the New Approach with a view to establishing definitions on a horizontal, fully harmonised level that would apply to any sectoral legislation targeting Orgalime industries.

## 2. Transparency and stakeholder consultation

Orgalime believes that the consultation of stakeholders should be improved for the future. Notwithstanding one possibility that Orgalime was given to present its views to member states representatives at the technical adaptation committee (TAC) and a number of round table meetings that DG Environment held with our industry, we feel that a well structured and continuous dialogue between authorities and those who have to implement the directive on the grounds would have been beneficial to clarify major aspects of transposing and implementing the directive.

In the light of Better Regulation, we suggest **a better, more structured and durable dialogue between industry and authorities (including enforcement authorities) for the future**. This dialogue could take form of a permanent consultative body comprising all stakeholders, which is a concept that works well and has proven useful for other directives, e.g.: machinery, noise or gaseous emissions from machinery, or that is foreseen in recently adopted directives, such as Eco Design of Energy Using Products (EuP).

## 3. Orgalime believes that the scope of the WEEE Directive requires further simplification.

The scope of the WEEE Directive still remains unclear in certain areas. The criteria provided by the legal text, also if read in conjunction with the additional guidelines provided in the Commission's Frequently Asked Questions document, are insufficient in order to reliably determine whether certain products do or do not fall under the scope of the WEEE Directive. This creates legal uncertainty for European companies and equally causes fragmentation in the internal market, especially with respect to product requirements and for the link between the scope of the WEEE and RoHS Directives.

- The Commission in its Frequently Asked Questions Document provides a number of criteria for determining the scope of WEEE, which Orgalime supports. In particular, we support the additional interpretation provided for article 2.1. WEEE by applying the criterion whether or not a product is part of a “fixed installation”:
  - a) The notion “fixed installation” is a settled term that is derived from existing Community law that applies equally to the same products subject to WEEE.  
If fixed installations were considered to fall under the scope of WEEE, as some authorities seem to argue, this would mean that installations in petrochemical, automobile manufacturing, pharmaceutical, material handling, power generation, water treatment or paper manufacturing plants would be subject to WEEE. This clearly was not the intention of the WEEE Directive when it was adopted.  
Article 2.1 refers to all categories listed in annex I.A of the WEEE Directive. The criterion of “*another type of equipment*” and its additional interpretation guideline of “*fixed installations*” therefore cannot be limited to a selected number of WEEE categories, but must be horizontally applied as a criterion on its own right. It must therefore be handled completely separately from the exclusion of “large-scale stationary industrial tools” as in category 6 of Annex IA/IB of the WEEE Directive.
  - b) The additional interpretation of what constitutes a “finished product” is fundamental to distinguish between EEE and components.

For reasons of legal certainty and ensuring a level playing field for companies, we propose to assess the possibility of incorporating the criterion of “fixed installation” and of “finished product”<sup>4</sup> in the legal body of the Directive. Such a clarification is in our view important to foster fair competition and avoid barriers to trade in the internal market.

- We question the need to include equipment from professional users, which by nature is not used by private consumers, under WEEE since such waste equipment does not end up in the municipal waste stream and we understand that the quantities are insignificant. It has long been in the tradition of professional goods manufacturers when supplying a replacement machine to deal with discarded equipment. It is therefore important to keep sufficient flexibility to ensure an effective and cost efficient management of B2B waste.
- Take-back obligations should not be extended to (additional) professional goods.
- Finally, we recommend amending the RoHS Directive with an own scope that incorporates the criteria of “fixed installation” and “finished products” directly into the RoHS Directive.

---

<sup>4</sup> Orgalime supports the definitions of “fixed installation” and “finished product” as provided in Directive 2004/108/EC on electromagnetic compatibility.

#### 4. Annex II sets common treatment requirements for WEEE.

Annex II of the WEEE Directive gives rules on selective treatment for materials and components in accordance with art. 6 (1):

1. as a minimum substances, preparations and components that have to be removed;
2. components that have to be separately to be collected and treated;
3. extra rule that reuse and recycling is not hindered;
4. evaluation priorities.

Article 6 (1) WEEE refers to the use of best available treatment, recovery and recycling techniques. In general, however, due to the wide variety of different electrical and electronic equipment, it is impossible to develop one best practice for the entire scope of the Directive. Even if a best practice could be agreed for a certain category of products, too precise descriptions do not leave sufficient room for the development of new technologies and practices. However, we understand, that it is a policy of the Commission to promote innovative techniques in the area of the environment.

**Orgalime takes the view that only objective environmental performance criteria verified by sound monitoring can reach the pursued environmental objectives. Should a common obligatory monitoring system be introduced, there would be no further need for Annex II WEEE.**

The following aspects further underpin this Orgalime proposal:

- In its TAC working group, member states have defined further interpretation of the term “*have to be removed*” as follows:

*“Substances, preparations and components may be removed manually, mechanically or chemically, metallurgically with the result that hazardous substances, preparations, and components and those mentioned in Annex II are **contained as an identifiable stream or identifiable part of a stream at the end of the treatment process**. A substance, preparation or component is identifiable if it can be (is) **monitored to prove environmentally safe treatment**.”*

This agreed member states’ interpretation again places more emphasis on the issue of sound monitoring of hazardous substances, preparations or components at the end of a treatment process rather than on prescribing particular treatment techniques and/or practices.

- The monitoring of the substances, preparations and components (either hazardous waste, fluids or mentioned in the entries of Annex II) that have been removed is essential to “prove” the environmentally safe treatment. This monitoring can be organised in the licensing or in the quality systems of the treatment facility. For monitoring, no new data have to be collected, because the data already gathered in accordance with the licence and with hazardous waste legislation and other waste regulations could be used.
- When removed, evidence has to be given by the first treatment facility that the (final) processing, recycling and/or disposal of these substances, preparations and components has no detrimental effects on the environment.
- Furthermore, in parallel to annex II WEEE, other legislation exists, e.g.: the IPPC Directive, the draft waste directive or the waste shipment regulation.
- Under the IPPC Directive a Waste Management Best Available Techniques Reference Document (BREF) exists. In the context of EU legislators’ discussion on the Thematic Strategy of Waste Prevention and Recycling and the proposal for a waste Directive, the establishment of minimum recycling standards is under consideration, also in parallel to annex II WEEE. This would multiply legislation on WEEE treatment, to which we object, as it is incoherent. Besides, cost-efficiency must be the guiding principle and such new recycling standards, which might be adopted, bear the risk of resulting in higher prices for consumers.

**In conclusion, if legislators provided environmental objectives for waste treatment without describing techniques instead of developing lists of best available techniques, annex II could be removed from the WEEE Directive. A set of outcome parameters should be considered in the context of article 6(1) WEEE. The best way to reconcile environmental objectives and to avoid detrimental effects to the competitiveness of producers is to allow a sustainable solution through technology and market forces (e.g.: raw material prices).**

## 5. Recycling targets and proposal to shift away from waste stream specific targets

Orgalime considers consistency and coherence in EU legislation a priority. Therefore Orgalime believes that the outcome of the discussion on the Thematic Waste Strategy on this issue and its potential implementation in our industry would require further consultation and discussion with our sector. It is of utmost relevance to avoid two different systems running in parallel and the duplicated costs such parallel systems would cause. When deciding on how to handle certain waste fractions, the specific kind of product has to be evaluated and the economic impact of such decisions should be assessed properly in advance.

Orgalime understands and supports the overall environmental aims of a future waste management, i.e. minimizing environmental impacts and optimising resources efficiency, for the lowest costs. At the same time Orgalime sees a necessity to allow for flexibility regarding waste management activities in the market. An overall efficient waste management has to optimally align case-by-case qualities and amounts of distinct waste streams, available technologies for treatment, recycling and recovery and not least markets for products derived from such activities.

Flexibility is all the more important because different pre-conditions (technological, economic, regulated) are found in different EU member states. In order not to lose track regarding the overall environmental targets, a conceptual approach, similar to the one already put for discussion in the course of the End-of-Life-Vehicles stakeholder consultations in 2005, is seen as particularly promising: with a view to optimising efficiency of resources, we believe that a "divert-from-landfill" policy of highly calorific waste should be developed.

So as to minimise the environmental impacts, harmonised standards for treatment, recovery and disposal operations should be agreed at EU level and executed in a harmonized manner in each EU member state. Such a framework would both, achieve the environmental aims and efficiently provide sufficient flexibility to deal with different pre-conditions in different countries. Moreover, this would facilitate market surveillance and render it more reliable and consistent. Concepts based on an assumed environmental hierarchy of waste treatment operations - and from which product specific (sub-) targets are defined - should be lowered in importance or abandoned.

The Thematic Waste Strategy states that it should be the long-term goal for the EU "to become a recycling society that seeks to avoid waste and uses waste as a resource". Such a goal should be clearly tempered in the light of what is environmentally and energy efficient, economically and technically feasible, particularly at the level of recycling. From a life cycle perspective, recycling may not always be the preferred option. In many cases recovery is more efficient.

Besides, the Thematic Waste Strategy stresses that the recent revision of the recycling and recovery targets contained in the Packaging and Packaging Waste Directive "has shown the importance of setting targets at the appropriate levels in proportion to the scope of the definition and of taking into account the specifics of each material". "Without such an analysis", the Strategy continues, "there is a risk of setting targets that promote processes with little or no environmental benefit or which fail to promote technologies that could deliver sizeable environmental benefits but find it difficult to break into the market" (see page 18).

Orgalime underlines that impact assessment has shown that rigid target setting in new waste stream based Directives is not always effective. The targets set in the WEEE Directive are also extremely ambitious. In view of these targets being subject to the revision in 2008, Orgalime requests any review in this area to be based on solid analysis of the experiences with WEEE implementation as well as proper impact assessment and stakeholder consultation. As experiences in national take-back-systems at the present time are limited these considerations should take place once sufficient data becomes available. In addition, it should be mentioned that quite different products with quite different materials will make it difficult to focus on special improvement measures of single product categories. The continuous introduction of innovative materials will not allow the extrapolation of new targets for future recycling from historic waste products.

**Orgalime takes the view that if policy makers provided clear-cut environmental objectives for waste treatment, recycling, incineration and landfill, the necessity of setting targets, be they waste-stream oriented or material specific, could be revisited in general.** In any case, it would be premature to propose stricter targets prior to all member states reaching the given targets.

## **6. Collection Targets**

The current “one-size-fits-all” approach towards collection targets creates major unwanted effects and discrepancies between member states. While some of the EU-15 are well above the given collection target, most of the new EU-12 member states will have problems reaching the established target even under the extended derogation periods granted to them. The reasons for this are mainly twofold: firstly, due to different historic market situations the amount of WEEE generated in these countries today is limited. Secondly, the collection infrastructure today is insufficient or almost non-existent in most of the new member states.

Orgalime takes the view that at this early stage more time should be allowed to gather experience on the amount that it is feasible to be collected.

Any regulation of collection targets, however, cannot be directed to manufacturers in the clear absence of possible measures to steer the behaviour of private consumers. Any enforcement measure of member states towards collection targets can in our view only target citizens. Again, it would be arbitrary to propose a stricter target prior to all member states reaching the given target.

Further discussions on the setting of a collection target are related to question and ongoing discussions on the waste hierarchy in the draft waste Directive. In particular, some wish to apply a rather inflexible waste hierarchy that would enshrine “re-use” as a first priority.

## **7. Reuse takes place before a product has become waste**

Orgalime acknowledges the importance of re-use, both, in waste policy and from a social perspective. However, Orgalime is concerned with the priority that the WEEE Directive gives to “re-use”, especially against energy efficiency aspects, which regulators have set in parallel as a priority for designing EEE.

Refurbishment of appliances raises several concerns: For basically all EEE, life cycle assessment demonstrates that the major environmental impact of an EEE relates to the use of the product, rather than to the production and even less to the recycling of an appliance, i.e.: new products are more energy efficient than preceding models. Promoting re-use without paying attention to these considerations may in fact raise energy consumption and therefore result in counterproductive environmental impacts.

The second and probably even more sensitive concern relates to the issue of who guarantees the safety of a refurbished appliance. When the product was originally put on the market it was assessed for safety and CE marked by its producer. This is only valid for a product in its original shape, with approved components assembled and connected in a tested and approved manner. After refurbishment, however, the original CE marking can no longer be guaranteed and the original producer cannot take on the responsibility for the safety of the refurbished product.

To be realistic, only few products that enter the waste stream are fit for refurbishment or re-use. At that moment, they are in principle worn-out: they should be treated as waste and the materials should be recycled. If a product is still performing properly, including on environmental aspects from a life cycle perspective and in comparison to state of art technology, it can and should be sold on the second hand market due to its value.

## **8. Design aspects in WEEE**

In 2005, the European Parliament and the Council adopted the Eco Design of Energy Using Products Directive (EuP) that establishes a framework for the integration of environmental aspects into product design from a life cycle perspective. With the adoption of this Directive, we believe that article 4 WEEE on design for recycling has become obsolete. Design for recycling should not be the only criterion when designing products, but all environmental aspects must be considered from cradle to grave in the interest of avoiding adverse environmental effects.

As elaborated under item 5, we challenge the priority given to long living products and “re-use” against energy efficiency aspects, which regulators also set as a priority for designing EEE.

**In conclusion, we take the view that article 4 WEEE can be deleted from the Directive since it has been rendered superfluous with the adoption of the EuP Directive.**

## IV. CONCLUSIONS

Orgalime as the voice of European electrical and electronic goods manufacturers, mechanical engineering and metalworking industries believes that the upcoming WEEE review should become a real and concrete example of Better Regulation and Simplification.

At the level of member states, transpositions have not only been significantly delayed due to the complexity of the Directive. They have also introduced many diverging requirements, including on product related aspects (such as marking, reporting or registering), making companies often face multiple differing requirements within the internal market. This, in our view, is due to the fact that the sole legal base of the Directive is article 175 of the EC Treaty, which provides far too much room for member states to interpret the Directive.

Divergences in national transpositions, which for example are particularly evident for WEEE registration<sup>5</sup>, not only undermine key principles enshrined in the EC Treaty, such as the functioning of the internal market and the free movement of goods in the internal market. They equally weaken the implementation of the Directive (i.e.: products will be less traceable), and therefore the realisation of the environment objectives pursued by the WEEE Directive. Divergences of course negatively impact the competitiveness of EU manufacturers of electrical and electronic goods.

Orgalime therefore takes the view that the Commission should play an active role in ensuring that member states correctly transpose the Directive. The review however should as a priority address internal market related issues and fine-tune the Directive in such areas.

The potential for improving the WEEE Directive should in our view be explored by

- Introducing a dual legal base of article 175 and 95 of the EC Treaty,
- Clarifying the scope of the Directive,
- Ensuring consistency and coherence of WEEE with other legislation and concepts applying on EEE, and the EuP and IPPC Directives and the REACH regulation or the New Approach,
- Not duplicating waste management systems for EEE by parallel material specific targets or systems,
- Re-evaluating the necessity of annex II, recycling/recovery as well as collection targets against alternative approaches, i.e.: setting environmental outcome parameters and objectives instead,
- Developing a “divert from landfill” policy for highly calorific waste,
- Removing design related provisions of the WEEE Directive since they are consumed with the final adoption of the EuP Directive.

Orgalime is committed to continuously providing input to the WEEE review process and hopes that the European Institutions will see fit to shape WEEE in a sustainable manner rather than introducing yet further environmental requirements without considering the competitiveness of European electrical and electronic manufacturers that act globally.

---

<sup>5</sup> See Orgalime position paper and proposals for harmonised data and reporting formats available at [www.orgalime.org](http://www.orgalime.org)