



October 18, 2005

EICTA, CECED, AeA Europe and EERA Joint Position Guidance on implementing article 11 of Directive 2002/96 (EC) concerning information for treatment facilities

EICTA (European Information & Communications Technology Industry Association), CECED (European Committee of Domestic Equipment Manufacturers) AeA Europe (American Electronics Association Europe), and EERA (European Electronics Recyclers Association), have developed a common understanding of information needs on equipment characteristics relevant for end of life treatment. Consequently, the above mentioned associations hereby jointly propose a guidance in implementing Article 11 of the Directive 2002/96/EC on Waste Electrical and Electronic Equipment (WEEE) (hereinafter called "the Directive").

In general terms, EICTA, CECED, AeA Europe and EERA have established the conditions for a sustained dialogue between producers and recyclers based on agreed items of interest for a better handling of WEEE.

- Each producer creates an access point for recyclers to post questions in relation to his products, typically an alias to be used on the producer's internet site
- A producer, upon request from a recycler dealing with one of his equipment put on the market after August 13th 2005, provides information on "positive presence" of materials and components as listed in Annex A, at product level or product family level. Other questions will be handled on a "reasonable effort" mode. The common dialogue language is English.
- Producers and recyclers contribute via above-mentioned associations to a constructive and sustained dialogue to discuss past and future technology trends used in products and update Annex A as appropriate in particular in the light of Annex 2 implementation guidance and changes.

The format the product information will take is left to the initiative of the producer. Sketches or pictures would ease the interpretation of the responses.

Depending on the solutions put in place in the different countries by producers to organise collection and treatment of their products, producers, as an alternative to the above, may look at the possibility to organise dialogue between producers and treatment operators via the take-back schemes.

Note: some of the materials and components listed in the Annex A (e.g. asbestos ,capacitors containing PCB) are restricted in use in electrical and electronic equipment of above-mentioned associations' member companies and are thus no longer in many products put on the market today. However, for certain applications and/or for certain sectors covered by the Directive these materials may still be used.

Annex A

Producer:	<company name, other on addressing the producer>
Scope of information sheet:	< product category as in Annex IA of WEEE Directive, or type of equipment as in Annex 1B of WEEE Directive, or producer's Product Family, or single products identified by brand and model name >

Component or Material	Remarks / Location
Battery (internal *) containing Mercury (Hg)/ NiCad/Lithium/ Other	↓
Backlighting lamps of LCD/TFT or similar screens containing Mercury (Hg)	
Mercury (Hg) in other applications**	↓
Cadmium**	
Gas discharge lamps	
Plastic containing brominated flame retardants other than in Printed Circuit Assemblies ***	
Liquid Crystal Displays with a surface greater than 100 cm ²	
Capacitors with PCB's	↓
Capacitors with substances of concern**** + height > 25 mm, diameter > 25 mm or proportionately similar volume	↓
Asbestos	
Refractory ceramic fibres	
Radio-active substances	
Beryllium Oxide	↓
Other forms of Beryllium	
Gasses - which fall under Regulation (EC) 2037/2000 and all hydrocarbons (HC).	<type of gas, properties, volume and/or weight> ↓
Components with pressurised gas which need special attention (Pressure > 1,5 bar) *****	<type of gas, pressure level, discharge method> ↓
Liquids ***** if volume > 10 cl (or equivalence in weight, e.g. for PCB, oil...)	<type of liquid, discharge method> ↓
Mechanical components that store mechanical energy (i.e. springs) or equivalent parts which need special attention ***** (diameter > 10 mm and height > 25 mm or proportionally similar volume and expanding)	↓

↓ = arrow indicates the need for the location of the compartment/ substances within the product. When the location of a substance/ components is requested, it is at part level, e.g. main board, housing etc

* Internal means that batteries can only be removed by opening the product by means of (a) tool(s).

** Substances are considered to be in the product if present above the levels specified in Commission Decision 2005/618/EC related to Directive 2002/95/(EC) (RoHS Directive) or if their use is permitted through exemptions in the Annex of Directive 2002/95(EC)

*** To be coherent with industry current standards and practices on tracking of plastic parts, Directive 2002/96 (EC) Annex II requirement is understood to focus on plastic parts that weight more than 25 g.

**** Substance of concern other than PCB, to be specified/ addressed further in the context of Directive 2002/96 (EC) Annex II national requirements and European developments

***** Needs of equivalent nature as those for maintenance, service manuals and installation for safety purposes.

EICTA - founded in 1999 is the voice of the Information and Communications Technology and Consumer Electronics Industry in Europe. It is composed of 50 major multinational companies and 32 national associations from 24 European countries. In all, EICTA represents more than 10,000 companies all over Europe with more than 2 million employees and over EUR 200 billion in revenues.

CECED - represents the household appliances manufacturing industry in Europe. Its member companies employ over 200.000, are mainly based in Europe and have a turnover about 40 billion euro. If upstream and down stream business are taken together, the sector employs over 500.000 people.

AeA Europe - represents leading European high-tech operations with US parentage. Collectively we invest Euro 100 bn in Europe and employ approximately 500,000 Europeans. Our parent company, AeA, is the oldest and largest US high-tech association (3000 + companies).

EERA - The European Electronics Recyclers Association - EERA is a non-profit organisation that promotes the interest of recycling companies who are treating waste electrical and electronic equipment (WEEE) in Europe. EERA aims for the harmonization of national and international regulations for WEEE recycling in order to obtain a free market for demand and supply of services.

EERA calls for environmentally sound operating practices for WEEE recycling activities and members are signatories to the rules of conduct to safeguard protection of human health and the environment