



# **Study on harmonisation of the format for registration and reporting of producers of Electrical and Electronic Equipment (EEE) to the national register and on the frequency of reporting**

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## Disclaimer

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## Abstract

The Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE) (recast) (hereinafter called "the Directive") entered into force on 13<sup>th</sup> August 2012. One of the improvements introduced by the Directive is the harmonisation of national registration and reporting requirements under the Directive. Member States' registers for producers of Electrical and Electronic Equipment (EEE) will now have to be integrated more closely.

44 stakeholders from the MS authorities, industry associations, producers and Extended Producer Responsibility (EPR) compliance systems were consulted using different techniques, i.e. structured questionnaire, interviews, and workshops.

The proposal for harmonised data structure and format for registration and reporting of EEE producers to the national register is defined and it is complemented with the data model, Unified Modelling Language (UML)<sup>1</sup>-based diagrams and recommendations. It is also proposed reporting on quarterly basis with deadline of 30<sup>th</sup> of the month following the respective quarter for provision of the report.

## Executive summary

Electrical and Electronic Equipment (EEE) is developing fast and spreading over every part of modern life. In the European Union, e-waste is the fastest growing waste stream, growing at 3-5% per year, which is three times faster than average waste.<sup>2</sup>

Recently conducted study on Countering WEEE Illegal Trade (CWIT)<sup>3</sup> reports that for all EU-28 countries plus Norway and Switzerland, the total amount of WEEE generated in 2012 is 9.45 million tons. However, only 35% (3.3 million tons) of all the e-waste discarded in 2012 ended up in the officially reported amounts of collection and recycling systems. The other 65% (6.15 million tons) was either exported (1.5 million tons), recycled under non-compliant conditions in Europe (3.15 million tons), scavenged for valuable parts (750,000 tons) or simply thrown in waste bins (750,000 tons). The report gives a set of recommendations, including a call for better national monitoring and more accurate and compatible waste codification system that is crucial for waste traceability.

The Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE) (hereinafter called "the Directive") entered into force on 13<sup>th</sup> August 2012. One of the improvements introduced by the Directive is the harmonisation of national registration and reporting requirements under the Directive. Member States' registers for producers of Electrical and Electronic Equipment (EEE) will now have to be integrated more closely.

In this context, the Commission launched the study on harmonisation of the data structure and format for registration and reporting of EEE producers to the national register and on the frequency of reporting.

The methodology applied for conducting this study included desk research, survey with structured questionnaire followed by interviews and organisation of the stakeholders' workshop in Brussels.

The Questionnaire was sent to 64 stakeholders (institutions) out of which:

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<sup>1</sup> Unified Modelling language (UML) is a standardized modeling language enabling developers to specify, visualize, construct and document artifacts of a software system. Source: <https://www.techopedia.com/definition/3243/unified-modeling-language-uml>

<sup>2</sup>EC, JRC, "Implementation of the Waste Electric and Electronic Equipment Directive in the EU", 2006.

<sup>3</sup> <http://www.cwitproject.eu/>

- 29 national authorities (28 Member States + Norway)
- 14 industry associations
  - Digital Europe
  - Orgalime
  - European Committee of Domestic Appliance Manufacturers (CECED)
  - Lighting Europe
  - European Photovoltaic Industry
  - Test and Measurement Coalition (TMC)
  - European Association of Internal Combustion Engine Manufacturers (EUROMOT)
  - Semiconductor Equipment and Materials International (SEMI)
  - European Coordination Committee of Radiological, Electromedical and Healthcare IT Industry (COCIR)
  - European Diagnostic Manufacturers Association
  - Toy Industries of Europe (TIE)
  - Japan Business Council of Europe (JBCE)
  - Tech America
  - American Chamber of Commerce in EU
- 21 EPR compliance systems
  - Austria, UFH
  - Recupel, Belgium
  - Czech Republic, Retela
  - Denmark, Elretur
  - Estonia, EES-Ringlus
  - France, Eco-systèmes
  - Greece, Appliances recycling
  - Ireland, WEEE Ireland
  - Italy, Ecodom
  - Lithuania, EGI
  - Netherlands, WeCycle
  - Norway, Elretur
  - Poland ElektroEko
  - Portugal, Amb3E
  - Romania, RoRec
  - Slovakia, Asekol
  - Slovenia, Zeos
  - Spain, EcoAsimelec
  - Sweden, El-Kretsen
  - Switzerland, SENSERecycling
  - UK, Repic

Answers are received from 51 stakeholders, out of which:

- 29 national authorities (28 Member States + Norway)
- 6 industry associations
- 3 industry associations sent their position paper
- 5 companies as a member of their respective associations
- 8 EPR compliance systems provided response to the questionnaire

As some organisations responded jointly, response from 44 stakeholders is used as a baseline number for the analysis:

- 29 national authorities (28 MS + Norway)
- 4 Industry associations (EucoLight, UK Lighting Association, Test and Measurement Coalition, and TechAmerica)
- 3 companies (SpinMaster-NL, Pioneer-BE and Philips Healthcare-US)
- 8 EPR Compliance systems (Austria, Estonia, Greece, Ireland, Netherlands, Romania, Slovenia and Switzerland)

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Complementary to the Questionnaire, 18 interviews were conducted:

- 7 national authorities
  - Belgium
  - Croatia
  - Cyprus
  - Denmark
  - Germany
  - Ireland
  - Norway
  
- 5 industry representatives
  - American Chamber of Commerce to the EU
  - Lighting Europe
  - Euco Light
  - Pioneer, Belgium
  - Johnson and Johnson, Europe
  
- 2 EPR compliance systems
  - Recupel, Belgium
  - Portugal, Amb3E
  
- 4 other stakeholders
  - WEEE Forum
  - European WEEE Registers Network (EWRN)
  - United Nations University (UNU)
  - FP7-funded project "Countering WEEE illegal trade"

The results of the stakeholders' consultations and initial draft proposal for harmonised data structure and format for registration and reporting were presented and discussed at the workshop organised on 22 June 2015 in Brussels.

An updated proposal for harmonised structure and format for registration and reporting was also presented at the Technical Adaptation Committee (TAC) on WEEE meeting on 9 September 2015. Comments received following the TAC meeting are incorporated in the relevant project outputs.

This report describes the proposed harmonised data structure and format for registration and reporting, including the corresponding data model, UML-based diagrams and XML schema<sup>4</sup>. The study also elaborates on the following given recommendations:

- Introduce the proposed harmonised data structure and format for registration and reporting of EEE producers to the national register as detailed in the report, which will serve as the common denominator of dataset for all MS.
- Develop an EU-wide e-waste categorisation system with corresponding codification system with consideration of using the UNU-keys. Existence of one, harmonised waste categorisation system would bring simplification for the industry as it would 'replace' the currently existing different MS-tailored EEE categorisation systems. Additionally, traceability, monitoring and reporting would be streamlined and harmonised.
- Align the frequency and period of reporting among the MS with proposed quarterly reporting and deadline for submission of reports by 30<sup>th</sup> of the month following the respective quarter.

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<sup>4</sup> XML Schemas are documents that are used to define and validate the content and structure of XML data, just as a database schema defines and validates the tables, columns, and data types that make up a database. You use an XML Schema to guarantee consistency among certain types of XML data that is shared between applications and organizations. An XML Schema can be used/seen as a contract for data exchange between two applications. (Source: [https://msdn.microsoft.com/en-US/library/efc70bx3\(v=vs.80\).aspx](https://msdn.microsoft.com/en-US/library/efc70bx3(v=vs.80).aspx))

## Résumé opérationnel

Les équipements électriques et électroniques (EEE) se développent rapidement et se propagent dans chaque partie de la vie moderne. Dans l'Union Européenne, la croissance du flux des déchets électroniques est la plus rapide, avec un accroissement de 3-5% par an, ce qui est trois fois plus rapide que la moyenne de tous les déchets.<sup>5</sup>

Une récente étude menée sur la lutte contre le commerce illicite de DEEE (CWIT)<sup>6</sup> rapporte que pour tous les pays de l'UE-28 plus la Norvège et la Suisse, le montant généré de DEEE en 2012 est de 9,45 millions de tonnes. Cependant en 2012, seulement 35% (3,3 millions de tonnes) de tous les e-déchets mis au rebut ont finis dans les données déclarées officiellement dans les systèmes de collecte et de recyclage. Les 65% restants (6,15 millions de tonnes) ont été soit exportés (1,5 millions de tonnes), soit recyclés dans des conditions non-conformes en Europe (3,15 millions de tonnes), soit récupérés comme matières précieuses (750.000 tonnes) ou tout simplement jetés dans des poubelles (750.000 tonnes). Le rapport propose une série de recommandations, dont un appel pour un meilleur suivi national et un système de codification plus précis et compatible des déchets qui est crucial pour la traçabilité des déchets.

La directive 2012/19 /UE relative aux déchets d'équipements électriques et électroniques (DEEE) (ci-après dénommée «la directive») est entrée en vigueur le 13 Août 2012. Une des améliorations introduites par la directive est l'harmonisation de l'enregistrement national et les exigences en matière de rapports. Les registres des États membres pour les producteurs d'équipements électriques et électroniques (EEE) devront désormais être plus étroitement intégrés.

Dans ce contexte, la Commission a lancé l'étude sur l'harmonisation du format des données pour l'enregistrement et le rapportage au registre national des producteurs d'EEE ainsi que sur la fréquence de ces rapports.

La méthodologie appliquée pour la réalisation de cette étude comprenait une recherche documentaire, une enquête avec questionnaire structuré suivi par des entretiens ainsi que l'organisation, dans les locaux de la Commission à Bruxelles, d'un atelier de travail avec les parties prenantes.

Le questionnaire a été envoyé à 64 parties prenantes (institutions), dont:

- 29 autorités nationales (28 Etats membres + la Norvège)
- 14 associations de l'industrie
  - Digital Europe
  - Orgalime
  - European Committee of Domestic Appliance Manufacturers (CECED)
  - Lighting Europe
  - European Photovoltaic Industry
  - Test and Measurement Coalition (TMC)
  - European Association of Internal Combustion Engine Manufacturers (EUROMOT)
  - Semiconductor Equipment and Materials International (SEMI)
  - European Coordination Committee of Radiological, Electromedical and Healthcare IT Industry (COCIR)
  - European Diagnostic Manufacturers Association
  - Toy Industries of Europe (TIE)
  - Japan Business Council of Europe (JBCE)
  - Tech America
  - American Chamber of Commerce in EU

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<sup>5</sup> EC, JRC, "Implementation of the Waste Electric and Electronic Equipment Directive in the EU", 2006.

<sup>6</sup> <http://www.cwitproject.eu/>

- 21 système de conformité EPR
  - Autriche, UFH
  - Belgique, Récupel
  - République Tchèque, Retela
  - Danemark, Elretur
  - Estonie, EES-Ringlus
  - France, Eco-Systèmes
  - Grèce, Appliances recycling
  - Irlande, WEEE Ireland
  - Italie, Ecodom
  - Lituanie, EGI
  - Pays-Bas, WeCycle
  - Norvège, Elretur
  - Pologne, ElektroEko
  - Portugal, Amb3E
  - Roumanie, RoRec
  - Slovaquie, Asekol
  - Slovénie, Zeos
  - Espagne, EcoAsimelec
  - Suède, El-Kretsen
  - Suisse, SENSERecycling
  - Grande-Bretagne, Repic

Les réponses reçues de 51 parties prenantes, dont:

- 29 autorités nationales (28 Etats membres + la Norvège)
- 6 associations de l'industrie
- 3 associations de l'industrie ont envoyé leur argumentaire
- 5 entreprises en tant que membre de leurs associations respectives ont fourni des réponses au questionnaire
- 8 systèmes de conformité de l'EPR ont fourni une réponse au questionnaire

En résumé, les réponses de 44 parties prenantes sont utilisées comme numéro de référence pour l'analyse:

- 29 autorités nationales (28 Etats membres + la Norvège)
- 4 associations de l'industrie (EucoLight, UK Lighting Association, Test and Measurement Coalition, and TechAmerica)
- 3 entreprises (SpinMaster-NL, Pioneer-BE and Philips Healthcare-US)
- 8 systèmes de conformité de l'EPR (Autriche, Estonie, Grèce, Irlande, Pays-Bas, Roumanie, Slovénie and Suisse)

En complément au questionnaire, 18 entrevues ont été réalisées:

- 7 autorités nationales
  - Belgique
  - Croatie
  - Chypre
  - Danemark
  - Allemagne
  - Irlande
  - Norvège
- 5 représentants de l'industrie
  - American Chamber of Commerce to the EU
  - Lighting Europe
  - EucoLight
  - Pioneer, Belgium
  - Johnson and Johnson, Europe

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- 2 Système de conformité
    - Belgique, Recupel
    - Portugal, Amb3E
  
  - 4 autres parties prenantes
    - WEEE Forum
    - European WEEE Registers Network (EWRN)
    - United Nations University (UNU)
    - FP7-funded project "Countering WEEE illegal trade"

Les résultats pour la période de consultation des parties prenantes et la proposition initiale de la structure harmonisée des données ainsi que le format d'enregistrement et les rapports ont été présentés et discutés lors de l'atelier de travail organisé le 22 Juin 2015 à Bruxelles.

Une proposition de mise à jour pour la structure harmonisée et le format pour l'enregistrement et le rapportage a également été présentée le 9 Septembre 2015 à la réunion du Comité technique d'adaptation (TAC). Les commentaires reçus suite à la réunion TAC sont incorporés dans les documents pertinents du projet.

Le rapport décrit la proposition de structure harmonisée des données et le format d'enregistrement et de rapportage, y compris le modèle de données correspondant, basés sur les diagrammes UML et schéma XML. L'étude élabore également les recommandations suivantes:

- Mettre en place une structure harmonisée et format pour l'enregistrement et le rapport des producteurs d'EEE au registre national comme détaillé dans le rapport, qui servira de dénominateur commun de l'ensemble des données pour tous les États membres.
  
- Développer un système de catégorisation des déchets à l'échelle européenne avec le système de codification correspondant aux clés de l'UNU. L'existence d'un système harmonisé de classification des déchets apporterait la simplification pour l'industrie car il devrait «remplacer» les systèmes de catégorisation EEE existants qui utilisent actuellement différentes mesures des états membres. En outre, la traçabilité, le suivi et les rapports seraient rationalisés et harmonisés.
  
- Aligner la fréquence et la période de rapportage au sein des états membres avec une proposition de rapports trimestriels et une date limite pour la soumission des rapports pour le 30 du mois suivant le trimestre concerné.

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## Abbreviations

AR	Authorised Representative
ADEME	French Environment and Energy Agency
ANREEE	National Association for Registration of Electric and Electronic Equipment
B2B	Business-to-Business
B2C	Business-to-Customers
CAE	Classification of Economic Activity
CECED	European Committee of Domestic Appliance Manufacturers
COCIR	European Coordination Committee of Radiological, Electromedical and Healthcare IT Industry
CWIT	Countering WEEE Illegal Trade
DBA	Doing Business As
DPA-system	Danish Producer Responsibility system
EEE	Electrical and Electronic Equipment
EPR	Extended Producer Responsibility
EUROMOT	European Association of Internal Combustion Engine Manufacturers
HE	Household Equipment
HRA	Hellenic Recycling Agency
HS	Harmonised Commodity code
JBCE	Japan Business Council of Europe
LEPA	Lithuanian Environmental Protection Agency
MEPA	Malta Environmental and Planning Authority
MS	Member State
NEPA	National Environmental Protection Agency
SEMI	Semiconductor Equipment and Materials International
TAC	Technical Adaptation Committee
TMC	Test and Measurement Coalition
TIE	Toy Industries of Europe
UML	Unified Modeling Language
UNU	United Nations University
WEEE	Waste Electrical and Electronic Equipment
XML	Extensible Markup Language

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# 1 Introduction

## 1.1. Background

Electrical and Electronic Equipment (EEE) is developing fast and spreading over every part of modern life. In the European Union, e-waste is the fastest growing waste stream, growing at 3-5% per year, which is three times faster than average waste.<sup>7</sup> Recently conducted study on Countering WEEE Illegal Trade (CWIT)<sup>8</sup> report that for all EU-28 countries plus Norway and Switzerland, the total amount of WEEE generated in 2012 is 9.45 million tons; however, only 35% (3.3 million tons) of all the e-waste discarded in 2012 ended up in the officially reported amounts of collection and recycling systems. The other 65% (6.15 million tons) was either exported (1.5 million tons), recycled under non-compliant conditions in Europe (3.15 million tons), scavenged for valuable parts (750,000 tons) or simply thrown in waste bins (750, 000 tons).

The Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE) (hereinafter called "the Directive") entered into force on 13<sup>th</sup> August 2012. The new WEEE Directive gives EU Member States the tools to fight illegal export of waste more effectively. Illegal shipments of WEEE disguised as legal shipments of used equipment, in order to circumvent EU waste treatment rules, are a serious problem. The new Directive will force exporters to test and provide documents on the nature of their shipments when the shipments run the risk of being waste.<sup>9</sup>

The new collection targets agreed, an ambitious 85% of WEEE generated, will ensure that around 10 million tons, or roughly 20kg per capita, will be separately collected from 2019 onwards. The existing binding EU collection target is 4 kg of WEEE per capita, representing about 2 million tons per year, out of around 10 million tonnes of WEEE generated per year in the EU. By 2020, it is estimated that the volume of WEEE will increase to 12 million tons.<sup>10</sup>

A further improvement introduced by the Directive is the harmonisation of national registration and reporting requirements under the Directive. Member States' registers for producers of Electrical and Electronic Equipment (EEE) will now have to be integrated more closely.

In this context, the Commission launched the study on harmonisation of the format for registration and reporting of EEE producers to the national register and on the frequency of reporting.

## 1.2. Problem understanding

National Registers serve to register producers and to collect information on the quantities and categories of EEE placed on their market, as well as the amounts of WEEE collected, recycled, recovered and exported. Collecting information on the quantities of EEE placed on the market, gives Member States an indication of the amount of WEEE, they are likely to have to manage in the future.

The information on WEEE – collected, recovered, recycled – is essential in order to monitor compliance with the Directive's objectives. Beyond these tasks, national registers, whether run by public entities or private, provide information on the

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<sup>7</sup>EC, JRC, "Implementation of the Waste Electric and Electronic Equipment Directive in the EU", 2006.

<sup>8</sup> <http://www.cwitproject.eu/>

<sup>9</sup> Press release, 'Environment: New rules on e-waste to boost resource efficiency', [http://europa.eu/rapid/press-release\\_IP-12-898\\_en.htm](http://europa.eu/rapid/press-release_IP-12-898_en.htm)

<sup>10</sup> Idem



implementation of the Directive, the classification of EEE, and how to fulfil producer obligations in each Member State.<sup>11</sup>

The obligation for Member States to draw up a register of producers and collect information on the quantities and categories of EEE placed on their market and on the quantities and categories of WEEE collected, reused, recycled and recovered was already introduced by the Directive 2002/96/EC (old WEEE Directive) and some Member States have already drawn up such registers. However the information required upon registration differs among the Member States.

The 'WEEE Directive overhead' experienced by producers operating in multiple countries is regarded by them as unacceptably high. For organisations operating at an EU level, the burden would equate to multiple full time resources whether at central European level and/or in countries to insure proper compliance.

One producer summed up the difficulties facing producers as follows: "Placing on the market of 25 Member States and multiplying this by 3 (WEEE, packaging, batteries) we have to provide data to 81 Extended Producer Responsibility (EPR) compliance systems. It is therefore essential, especially for Small and Medium Enterprises (SME) selling in different Member States, that the type and format of data is harmonized throughout Europe wherever possible."<sup>12</sup>

For the above mentioned reasons during the recast it was noted a need for harmonisation. Article 16 of the Directive sets the requirements regarding the registration and reporting of EEE producers to the national registers.

### 1.3. Key provisions on Registration and Reporting

The Directive lays down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of Waste from Electrical and Electronic equipment (WEEE) and by reducing overall impacts of resource use and improving the efficiency of such use.

Article 16 of the Directive on "*Registration, information and reporting*", specifies that Member States shall draw up a register of producers, including producers supplying EEE by means of distance communication. The register shall serve to monitor compliance with the requirements of the Directive.

With regard to the Registration process, Article 16(2)(a) states that Member States shall ensure that each producer, or each authorised representative (AR) is registered as required and has the possibility of entering online in their national register all relevant information reflecting that producer's activities in that Member State.

Moreover, upon registering, each producer, or each authorised representative where appointed under Article 17 as appropriate, provides the information set out in Annex X, Part A, undertaking to update it as appropriate. (Art. 16(2) (b)).

With regard to the Reporting process, Article 16(2) (b) states that Member States shall ensure that each producer, or each authorised representative (AR) where appointed under Article 17, provides the information set out in Annex X, Part B.

<sup>11</sup> <https://www.ewrn.org/national-registers/why-national-registers/>

<sup>12</sup> EC, Joint Research Centre, "Implementation of WEEE Directive in EU 25", 2006.

## 1.4. Definitions

### 1.4.1. Electrical and Electronic Equipment (EEE)<sup>13</sup>

'Electrical and Electronic Equipment' or 'EEE' means equipment which is dependent on electric currents or electromagnetic fields in order to work properly and equipment for the generation, transfer and measurement of such currents and fields and designed for use with a voltage rating not exceeding 1 000 volts for alternating current and 1 500 volts for direct current.

### 1.4.2. Producer<sup>14</sup>

'Producer' means *any natural or legal person* who, irrespective of the selling technique used, including distance communication within the meaning of Directive 97/7/EC of the European Parliament and of the Council of 20 May 1997 on the protection of consumers in respect of distance contracts:

(i) is established in a Member State and manufactures EEE under his own name or trademark, or has EEE designed or manufactured and markets it under his name or trademark within the territory of that Member State;

(ii) is established in a Member State and resells within the territory of that Member State, under his own name or trademark, equipment produced by other suppliers, a reseller not being regarded as the 'producer' if the brand of the producer appears on the equipment, as provided for in point (i);

(iii) is established in a Member State and places on the market of that Member State, on a professional basis, EEE from a third country or from another Member State; or

(iv) sells EEE by means of distance communication directly to private households or to users other than private households in a Member State, and is established in another Member State or in a third country.

Whoever exclusively provides financing under or pursuant to any finance agreement shall not be deemed to be a 'producer' unless he also acts as a producer within the meaning of points (i) to (iv).

### 1.4.3. Waste Electrical and Electronic Equipment (WEEE)<sup>15</sup>

'Waste Electrical and Electronic Equipment' or 'WEEE' means electrical or electronic equipment which is waste within the meaning of Article 3(1) of Directive 2008/98/EC, including all components, sub-assemblies and consumables which are part of the product at the time of discarding.

### 1.4.4. WEEE from private households<sup>16</sup>

'WEEE from private households' means WEEE which comes from private households and WEEE which comes from commercial, industrial, institutional and other sources which, because of its nature and quantity, is similar to that from private households. Waste from EEE likely to be used by both private households and users other than private households shall in any event be considered to be WEEE from private households.

<sup>13</sup> Definition set out in Article 3(1)(a) of the Directive

<sup>14</sup> Definition set out in Article 3(1)(f) of the Directive

<sup>15</sup> Definition set out in Article 3(1)(e) of the Directive

<sup>16</sup> Definition set out in Article 3(1)(h) of the Directive

#### **1.4.5. Trading name of Producer<sup>17</sup>**

Trading name of the Producer is the name a business uses for advertising and sales purposes that is different from the legal name in its articles of incorporation or other organizing documents. A trade name can also be referred to as a "Fictitious Name" or a "Doing Business As" (DBA).

#### **1.4.6. Contact person<sup>18</sup>**

Contact person means a person associated with a company as a point of communication. It is a particular individual within a company or other organization who is selected as the point of initial or regular communication with that organization or its concerns.

#### **1.4.7. Authorised Representative<sup>19,20</sup>**

Authorised Representative (AR) means any natural or legal person established in the Member State who, explicitly designated by a Producer is established in another Member State or a third country and who acts instead of the Producer with regard to the latter's obligation under this Directive in that Member State.

#### **1.4.8. UNU Keys<sup>21</sup>**

UNU keys is the classification developed by the United Nations University, which is constructed on the basis that product groups share comparable average weights, material compositions, end-of-life characteristics and lifespan distributions.

This makes the system very useful for compiling WEEE statistics. The 54 UNU keys (54 product categories) can be grouped into the 10 EEE categories set out in Annex I to the Directive. The classification can also be linked to the new 6 categories introduced by the Directive (Annex III), which will come into effect in 2018 in the EU. Additionally, the classification under UNU keys closely follows the harmonised statistical coding of the international trade codes, the harmonised system (HS).

#### **1.4.9. Brand name<sup>22</sup>**

Brand name is defined as an arbitrarily adopted name that is given by a producer (manufacturer or merchant) to an article or service to distinguish it as produced or sold by that manufacturer or merchant and that may be used and protected as a trademark.

#### **1.4.10. Trademark<sup>23</sup>**

A trademark may consist of any signs capable of being represented graphically, particularly words, including personal names, designs, letters, numerals, the shape of goods or of their packaging, provided that such signs are capable of

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<sup>17</sup> [http://www.invention-protection.com/ip/publications/docs/Legal\\_Name\\_Trade\\_Name\\_Trademark.html](http://www.invention-protection.com/ip/publications/docs/Legal_Name_Trade_Name_Trademark.html)

<sup>18</sup> Source: Phorio standards, <http://standards.phorio.com/?t=definition&code=5835270378>; cited on 31/08/2015)

<sup>19</sup> This definition of AR is inspired by the definition of AR given in the DG SANCO Guideline document for Authorised Representatives from January 2012, in the context of the EC Directive on Medical devices. This document has been also mentioned in the EWRN Proposal for implementation of AR from June 2013.

<sup>20</sup> Further updated definition as per suggestion received from Malta during consultation period in September 2015.

<sup>21</sup> Source: "E-Waste statistics, Guidelines on Classification, reporting and indicators", UNU, 2015; Full text: [http://i.unu.edu/media/ias.unu.edu-en/project/2238/E-waste-Guidelines\\_Partnership\\_2015.pdf](http://i.unu.edu/media/ias.unu.edu-en/project/2238/E-waste-Guidelines_Partnership_2015.pdf)

<sup>22</sup> Source: Merriam-Webster dictionary; <http://www.merriam-webster.com/dictionary/brand%20name>

<sup>23</sup> Source: Article 2, Directive 2008/95/EC of the European Parliament and of the Council on the approximation of laws of Member States on trademarks; EU Office for Harmonisation in the Internal Market, <https://oami.europa.eu/ohimportal/en/trade-mark-definition>

distinguishing the goods or services of one undertaking from those of other undertakings.

#### **1.4.11. HS Code<sup>24</sup>**

The Nomenclature governed by the Convention on the Harmonized Commodity Description and Coding System, commonly known as "HS Nomenclature", is an international multipurpose nomenclature which was elaborated under the auspices of the World Customs Organization (WCO). The HS Nomenclature comprises about 5,000 commodity groups which are identified by a 6-digit code and arranged according to a legal and logical structure based on fixed rules.

The Combined Nomenclature of the European Union integrates the HS Nomenclature and comprises additional 8-digit subdivisions and legal notes specifically created to address the needs of the Community.

#### **1.4.12. Distance contract<sup>25</sup>**

Distance contract means any contract concluded between the trader and the consumer under an organised distance sales or service-provision scheme without the simultaneous physical presence of the trader and the consumer, with the exclusive use of one or more means of distance communication up to and including the time at which the contract is concluded.

#### **1.4.13. Weight of EEE<sup>26</sup>**

Weight of EEE means the gross (shipping) weight of the EEE, to be used by both private households and users other than private households, which may be either new or second hand, including all electrical and electronic accessories, but excluding packaging, batteries/accumulators, instructions, manuals, non-electric/electronic accessories and consumables.

### **1.5. Objectives of the Study**

Main objectives of the study are to define harmonised data structure and format for registration and reporting of EEE producers to the national register, and to propose a common frequency and period of reporting of EEE producers to the national register.

The study would lay the basis for preparation of the implementing act(s) required from the Commission in accordance with Articles 16(3) of the Directive.

### **1.6. Structure of the document**

The report has 9 chapters as follows:

- This chapter sets the scene for the rest of the report, describing the background of the study, its objectives and structure of this report.
- Chapter 2 describes the overall project approach and the methodology applied for collection and analysis of the data.

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<sup>24</sup> Source: DG TAXUD

[http://ec.europa.eu/taxation\\_customs/customs/customs\\_duties/tariff\\_aspects/harmonised\\_system/index\\_en.htm](http://ec.europa.eu/taxation_customs/customs/customs_duties/tariff_aspects/harmonised_system/index_en.htm)

<sup>25</sup> EU Directive on Consumer rights, 2011/83/EU, <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0083&rid=1>

<sup>26</sup> Note that proposed draft definition for weight of EEE is aligned with definition included in the draft implementing act on methodology for WEEE generated as presented by the Commission at the Technical Adaptation Committee (TAC) meeting on 9<sup>th</sup> September 2015.

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- Chapter 3 reviews the existing practices in Member States and Norway, for implementing the *registration* process of producers of EEE to the national register.
  - Chapter 4 looks at the existing information structure and format requested by the Member States and Norway for *reporting* obligations of producers of EEE to the national register.
  - Chapter 5 presents harmonised data structure and format for registration of producers of EEE to the national register.
  - Chapter 6 illustrates the proposed harmonised data structure and format for reporting of producers of EEE to the national register, including the proposed period and frequency of reporting.
  - Chapter 7 presents the data model for registration and reporting of EEE producers together with Unified Modelling Language (UML)<sup>27</sup>-based diagrams.
  - Chapter 8 presents the Extensible Markup Language (XML)<sup>28</sup> schema<sup>29</sup> of the proposed harmonised format for registration and reporting.
  - Chapter 9 draws out the main conclusions and recommendations from the analysis.
  - Annex A gives a brief overview of the existing MS legislation on registration and reporting and national registers.
  - Annex B presents an in-depth business analysis and proposal for harmonised data structure and format for registration.
  - Annex C contains the business analysis and proposal for harmonised data structure and format for reporting, including the frequency and period of reporting.

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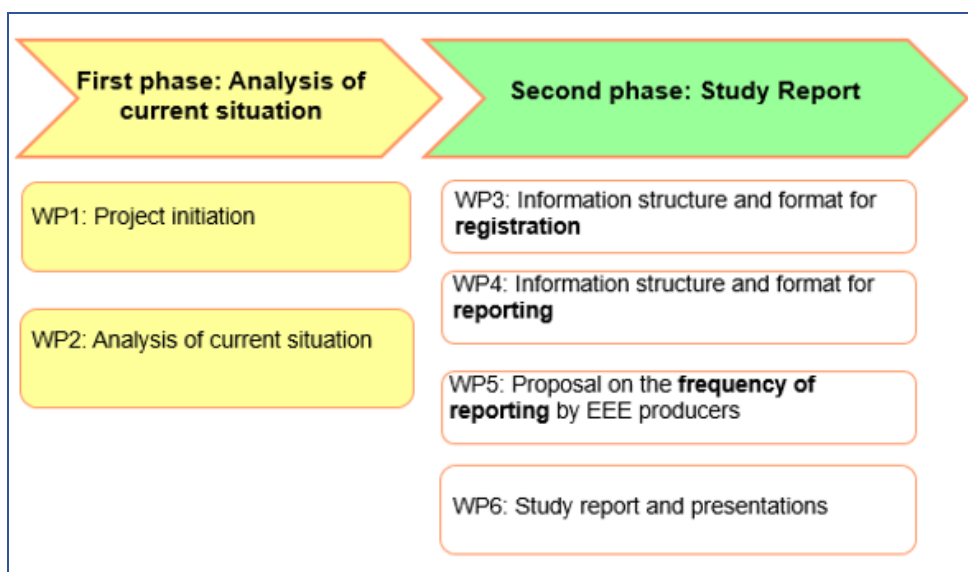
<sup>27</sup> The Unified Modelling Language (UML) is a general-purpose, developmental, modelling language in the field of software engineering that is intended to provide a standard way to visualize the design of a system. In 2005 the Unified Modelling Language was also published by the International Organization for Standardization (ISO) as an approved ISO standard 19501:2005.

<sup>28</sup> The Extensible Markup Language (XML) is a simple text-based format for representing structured information: documents, data, configuration, books, transactions, invoices, and much more. It was derived from an older standard format called SGML (ISO 8879), in order to be more suitable for Web use. XML is one of the most widely-used formats for sharing structured information today: between programs, between people, between computers and people, both locally and across networks.

<sup>29</sup> An XML schema, commonly known as an XML Schema Definition (XSD), formally describes what a given XML document can contain, in the same way that a database schema describes the data that can be contained in a database (i.e. table structure, data types, constraints etc.).

## 2 Project approach

The project is carried out in two sequential phases, each one having specific objectives, work packages and deliverables:



- First phase, 'Analysis of current situation' ('As-Is'), comprised activities for launching the project, data gathering via structured questionnaire and interviews, and analysis of the existing practices in the Member States and Norway for registration and reporting of EEE producers to the national register. During this phase, the following questions were raised:
  - What are existing practices on registration and reporting in MS? What data are collected, how and in which format?
  - Do EEE producers have to report to other institutions than the national register? If yes, to which institutions?
  - Which data are requested from the EEE producers for the registration process to the national register?
  - How registration process is currently carried out (e.g. online web template, Excel document, Word document, etc.)
  - What are the issues and obstacles faced by the industry and authorities with regard to the existing practices for registration and reporting?
- Second phase, 'Study Report preparation' ('To-Be' definition), included preparation of a proposal for harmonised structure and format for registration and reporting, taking into account the outputs of the stakeholders consultations carried out in the course of the study. These include the comments received during and following the workshop held on 22 June 2015, further discussions on the EEE categories and sub-categories among the volunteered members of the working group organised for this subject, as well as the comments received from the Member States Technical Adaptation Committee (TAC) on WEEE members.

The proposed harmonised format for registration and reporting of EEE producers to the national register is presented in a template following the corresponding sections in the Annex X, part A and B of the Directive.

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## 2.1. Methodology

The methodology applied for data collection and analysis included the following practical steps:

The first step comprised collection of the data using structured questionnaire and conducting the interviews. National legislations, including the existing registration and reporting templates of EEE producers to the national registers, were also reviewed. Annex A to this report gives a brief profile of Member States national legislation on registration and reporting of EEE producer and national registers.

The second step included comparative analysis of the national data against the datasets as specified in the Annex X of the Directive and to the draft proposal of the European WEEE Registers Network (EWRN) from June 2012. More specifically, all data fields as defined in the Directive and in the EWRN proposal were mapped against the MS national templates used for registration and reporting. As a result of the mapping process, it was identified a dataset for each section of the Annex X that is included in the national MS templates, and specifying the data included only by some national MS. Information on the number of EEE categories and (if) introduced sub-categories was also reviewed. Annex B presents in-depth analysis of the existing practices and data structure for registration together with the proposed harmonised data structure.

The third step draw out a proposal for harmonised data structure and format for registration and reporting, frequency and period of reporting, together with a proposal for aligning the EEE categories and sub-categories among the MS. The initial proposal was discussed at the stakeholders workshop held on 22 June 2015. Based on the feedback received, an updated proposal has been prepared and presented to the Member States during the Technical Adaptation Committee (TAC) meeting on the 9<sup>th</sup> September 2015. Additional comments were received from the TAC members during the consultation period in September 2015. Annex C describes the existing practices and data structure for reporting, including the proposed harmonised data structure and, frequency and period of reporting.

Based on the gathered information and comments, a refined proposal for the harmonised format is presented in this report. The proposal has a solid ground of justification embedded in the Annex X of the Directive and in the responses received from the wide stakeholders' audience, thus serving as a good foundation for preparation of the Commission implementing act (s) as requested in the Article 16(3) of the Directive.

### 2.1.1. Structured questionnaire

The structured questionnaire for consultation with the national authorities (28 EU MS + Norway) and industry representatives was launched during the period February-March 2015.

An invitation to take part in the consultation process was sent to 64 stakeholders:

- 29 national authorities (28 Member States + Norway)
- 14 industry associations
  - Digital Europe
  - Orgalime
  - European Committee of Domestic Appliance Manufacturers (CECED)
  - Lighting Europe
  - European Photovoltaic Industry
  - Test and Measurement Coalition (TMC)
  - European Association of Internal Combustion Engine Manufacturers (EUROMOT)

- 
- Semiconductor Equipment and Materials International (SEMI)
  - European Coordination Committee of Radiological, Electromedical and Healthcare IT Industry (COCIR)
  - European Diagnostic Manufacturers Association
  - Toy Industries of Europe (TIE)
  - Japan Business Council of Europe (JBCE)
  - Tech America
  - American Chamber of Commerce in EU
- 21 EPR compliance systems
    - Austria, UFH
    - Recupel, Belgium
    - Czech Republic, Retela
    - Denmark, Elretur
    - Estonia, EES-Ringlus
    - France, Eco-systèmes
    - Greece, Appliances recycling
    - Ireland, WEEE Ireland
    - Italy, Ecodom
    - Lithuania, EGI
    - Netherlands, WeCycle
    - Norway, Elretur
    - Poland ElektroEko
    - Portugal, Amb3E
    - Romania, RoRec
    - Slovakia, Asekol
    - Slovenia, Zeos
    - Spain, EcoAsimelec
    - Sweden, El-Kretsen
    - Switzerland, SENSERecycling
    - UK, Repic

Answers are received from 51 stakeholders, out of which:

- 29 national authorities (28 Member States + Norway)
- 6 industry associations responded to the Questionnaire
  - EucoLight
  - UK Lighting Association
  - NL Lighting Association
  - Test and Measurement Coalition (TMC)
  - Tech America
  - Danish Industries

Noting that response received from the NL Lighting Association has been also sent as the response of the WeCycle EPR compliance system, it is counted as one response from the compliance system. Comments received from the Danish Industries are incorporated in the overall report.

Thus, 4 industry associations (EucoLight, UK Lighting association, Test and Measurement Coalition, and TechAmerica) serve as a baseline number of responses for the analysis.

- 3 industry associations sent their position paper
  - Orgalime
  - Lighting Europe
  - EucoLight
- 5 companies as a member of their respective associations provided answers to the Questionnaire



- Philips Healthcare, USA, as a member of European Coordination Committee of Radiological, Electromedical and Healthcare IT Industry (COCIR)
- Spin Master Toys, Netherlands, as a member of Toy Industries of Europe (TIE)
- Pioneer, Belgium, as a member of the Japan Business Council of Europe (JBCE)
- C&E Fein, Germany
- Gorenje, Slovenia

The Slovenian compliance system 'Zeos' sent response on behalf of the company Gorenje, Slovenia, and thus their answer is counted as one received from the EPR compliance system. Input received from the company of C&E Fein, Germany is incorporated in the overall report.

Thus, 3 companies (Spinmaster-NL, Pioneer-BE and Philips Healthcare-US) serve as a baseline number of responses for the analysis.

- 8 EPR compliance systems provided response to the questionnaire
  - Austria, UFH
  - Estonia, EES-Ringlus
  - Greece, Appliances recycling
  - Ireland, WEEE Ireland
  - Netherlands, WeCycle
  - Romania, RoRec
  - Slovenia, Zeos
  - Switzerland, SENSERecycling

In summary, responses from 44 stakeholders is used as a baseline number for the analysis:

- 29 national authorities (28 MS + Norway)
- 4 Industry associations (EucoLight, UK Lighting Association, Test and Measurement Coalition, and TechAmerica)
- 3 companies (SpinMaster-NL, Pioneer-BE and Philips Healthcare-US)
- 8 EPR Compliance systems (Austria, Estonia, Greece, Ireland, Netherlands, Romania, Slovenia and Switzerland)

### **2.1.2. Interviews**

In addition to the structured questionnaire, 18 interviews were carried out:

- 7 national authorities (BE, HR, CY, DK, DE, IE and NO)
- 5 Industry representatives (American Chamber of Commerce to the EU; EucoLight; Lighting Europe; Pioneer Europe, and Johnson&Johnson Europe).
- 2 EPR compliance systems (Recupel, BE and Portugal Amb3E)
- 4 other stakeholders (WEEE Forum, European Association of the WEEE Registers Network (EWRN), United Nations University (UNU) and FP-7 funded project "Countering WEEE illegal trade" (CWIT)).

## **2.2. Project deliverables**

The project outputs include:

- A review of the national legislations and national registers currently in place in Member States
- Analysis of the existing practices for registration and reporting
- Results of the stakeholders consultation via structured questionnaire and interviews

- Definition of the harmonised data structure and format for registration of EEE producers to the national register
- Definition of the harmonised data structure and format for reporting of EEE producers to the national register
- Proposal for aligned frequency of reporting of EEE to the national register
- Development of the data model and UML-based diagrams for registration and reporting together with XML Schema and XML Schema documents.
- Conclusions and recommendations

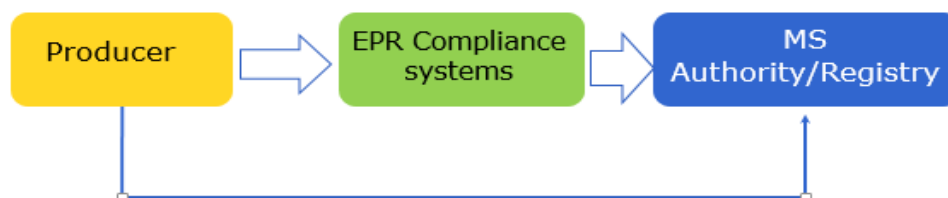
### 3 Registration existing practices in Member States

This section describes the existing practices in EU-28 Member States and Norway as regards to the registration of EEE producers. It describes the overall registration process, which datasets are included in the national MS registration templates together with the information on the national institutions responsible for management of the register. Also, it presents the issues identified by the authorities and the industry with regard to the registration.

#### 3.1. Registration process of EEE producers

The obligation for Member States to draw up a register of producers and collect information on the quantities and categories of EEE placed on their market and on the quantities and categories of WEEE collected, reused, recycled and recovered was already introduced by the Directive 2002/96/EC (old WEEE Directive) and some Member States have already drawn up such registers.

However, the overall process with defined roles and responsibilities differs among the Member States. The following 4 cases of the registration process are identified, when a producer chooses to meet its obligations by joining an EPR compliance system.



First, a producer is requested to register directly to the National Register. This practice is implemented in 6 MS: Austria, Germany, Ireland, Malta, Portugal and Slovakia.

Second, a producer submits its registration data to the selected EPR compliance system, who then on his/her behalf submit the registration data to the MS national register. This is implemented in 11 MS: Belgium, Croatia, Cyprus, Czech Republic, Finland, Greece, Latvia, Lithuania, Luxembourg, Netherlands and UK.

Third, a producer is given both possibilities, either to submit directly his/her registration to the MS national register or via his/her selected EPR compliance system. This is implemented in 11 MS: Bulgaria, Denmark, Estonia, France, Hungary, Italy, Poland, Romania, Slovenia, Spain and Sweden.

Fourth, a producer submits set of data to the selected EPR compliance system and/or other institution(s), such as customs authority, general business registration organisation etc. The set of relevant data for the registration purpose as defined in the Directive is then automatically transferred to the national register. This practice is implemented in Norway.

Similarly, role and responsibilities in the registration process, requested data and format of the national registration templates, validity period of a producer's registration, and how the registration needs to be submitted, differs significantly among the MS.

In that context, analysing the responses received from the Member State authorities requires sorting them according to the following keys:

- **Who** submits and who receives the registration
- In **which format** the registration is submitted

- **How** the registration is submitted
- **What** is the **validity period** of a producer registration (if in place)
- Is **registration fee** established

This information is available in Table 3-1 below for each of 29 national authorities that participated in this study.

Table 3-1: MS Registration Profiles

Country	Who submits the Registration		Who receives the Registration	In which format registration is submitted	How registration is submitted	Validity period of registration	Is a registration fee established
	Individual system	Collective system					
AT	Producer/IND	Producer	Federal Environment Agency (UBA)	Web form	Online	No	No
BE	Producer	EPR	Regional authorities of Flanders, Wallonia and Brussels; Recupel	Web form	Online	No	No
BG	Producer	Producer or EPR	Executive Environment Agency	Web form	Online	No	No
HR	Producer <sup>30</sup>	EPR	Environmental Fund and Energy Efficiency Fund	Excel sheet	Email; Postal mail	No	No
CY	Producer	EPR	Department of Environment, Ministry of Agriculture, Rural Development and Environment	Web form (EPR);	Online; Other (new web registration in preparation)	No	Yes; Other <sup>31</sup>
CZ	Producer	EPR	Ministry of Environment, Water management department, Take Back Unit	Web form (EPR); PDF. document	Online (EPR) Postal mail or Email (IND)	No	No

<sup>30</sup> Croatia: there is no registered EEE producers that opted for individual system of compliance (so called self-fulfillers).

<sup>31</sup> Cyprus: An operator of the individual system pays with the application fee of 1000€ to cover administrative costs, and 500€/year for monitoring costs. An operator of the collective system (EPR) pays with the application fee of 1500€ to cover administrative costs, and 500€/year for monitoring costs.

Country	Who submits the Registration		Who receives the Registration	In which format registration is submitted	How registration is submitted	Validity period of registration	Is a registration fee established
	Individual system	Collective system					
DK	Producer	EPR and producer <sup>32</sup>	Danish Environmental Agency part of the Ministry of Environment; Danish Producer Responsibility System (DPA-system)	Web form	Online; Postal mail	No	No
EE	Producer	EPR or Producer	Environmental Agency	Web form	Online	No	No
FI	Producer	EPR <sup>33</sup>	Centre for Economic Development, Transport and the Environment for Pirkanmaa	Web form; PDF document	Online; Email; Postal mail	No	Yes
FR	Producer	EPR or Producer	French Environment and Energy Agency (ADEME)	Web form	Online	No	No
DE	Producer	Producers	Stifung Elektro-Altgerate register (Stifung Ear)	Web form; MS Word document <sup>34</sup>	Online; Postal mail	No	Yes
EL	EPR <sup>35</sup>	EPR	Hellenic Recycling Agency (HRA)	MS Word document	Postal mail; Fax;	Yes (1 year)	No
HU	Producer	EPR or Producer	National Inspectorate for Environment and Nature	Web form	Online	No	Yes

<sup>32</sup> Denmark: If a producer joins EPR compliance system, the registration process of filling in the form will be done by the EPR; however, it is always the producer (individual or collective system) who has to print out the form, sign it and send to the DPA system by postal mail.

<sup>33</sup> Finland: Producers may transfer their producer responsibility to a producer association. Producer associations are registered to the Register of EEE producers and producer associations keep a register of their members.

<sup>34</sup> Germany: Online registration is the standard procedure. However, in case that a producer or an authorised representative has no internet connection, it is possible to submit registration data in written form by exception.

<sup>35</sup> Greece: Producers, who wish to place EEE on the market, establish a contract of cooperation with one of the two approved EPR compliance systems. Following the establishment of the contract, the producers submit an application for registration through the relevant EPR compliance system. As a response to the application, Hellenic Recycling Agency (HRA) registers the producer with a unique registration number referred as 'National Registration Number'.

Country	Who submits the Registration		Who receives the Registration	In which format registration is submitted	How registration is submitted	Validity period of registration	Is a registration fee established
	Individual system	Collective system					
IE	Producer	Producer	WEEE Register Society Ltd.	Web form; PDF document	Online; Postal mail	Yes (1 year)	Yes
IT	Producer	EPR or Producer	Chamber of Commerce; National Register of EEE Producer	Web form	Online	No	Yes
LV	Producer	EPR	Ministry of Environmental protection and Regional Development; Latvian Electrical Engineering and Electronics industry association	Web form; PDF document	Online; Postal mail	No	Yes
LT	Producer	EPR	Lithuanian Environmental Protection Agency (LEPA)	Web form; PDF document	Online; Postal mail; Email	No	No
LU	Producer	EPR	Environmental Protection Agency Luxembourg	Web form	Online	No	No
MT	Producer	Producer	The Malta Environmental and Planning Authority (MEPA)	Web form; PDF document	Online; Submission in-person at the MEPA front desk	Yes (1 year)	Yes
NL	Producer	EPR	The National (W)EEE Register	Web form	Online	Yes (1 year)	Yes
PL	Producer	EPR or Producer	Chief Inspectorate of Environmental Protection	PDF document; MS Word	Postal mail; Email (with electronic signature)	No	Yes

Country	Who submits the Registration		Who receives the Registration	In which format registration is submitted	How registration is submitted	Validity period of registration	Is a registration fee established
	Individual system	Collective system					
PT	Producer	Producer	Portuguese Environment Agency; National Association for Registration of EEE (ANREEE)	Web form	Online	No	Yes
RO	Producer	EPR or Producer	National Environmental Protection Agency (NEPA)	MS Word document	Submission in-person at the NEPA front desk; Postal mail	Yes (3 years)	Yes
SK	Producer	Producer	Ministry of Environment	MS Word document	Postal mail	No	No
SI	Producer	Producer and EPR	Environmental Agency and the Customs Administration	PDF document	Email; Postal mail	Yes (5 years)	No
ES	Producer	Producer or EPR	Ministry of Industry, Energy and Tourism	Web form	Online	No	No
SE	Producer	Producer or EPR	Swedish Environmental Protection Agency	Web form	Online	No	No
UK	Producer	EPR	Environmental Agency (Regulator England on behalf of other UK regulators)	Web form XML	Online; Email	Yes (1 year)	Yes <sup>36</sup>
NO	Producer	Producer and EPR	Norwegian Environment Agency (via Customs authority and compliance systems).			No	No

<sup>36</sup> UK: Small producers that place less than 5 tonnes of EEE on the market each year that choose to register directly with the UK Agencies pay an annual registration fee of £30. Large producers must register with a UK EPR compliance system. These producers are not charged directly but their EPR compliance systems are invoiced.



### 3.2. Registration data requested in national MS templates

This section presents information elements (IE) corresponding to the sections of the Annex X, part A, of the Directive, and if they are included in the national MS registration templates.

Annex B-*'Business analysis and proposal for harmonised data format for Registration of EEE producer'* contains a detailed analysis of the national Member States registration templates as mapped against the data as defined in the Annex X, part A of the Directive. The output identified a common dataset already included by the majority of the MS in their national registration templates, together with any additional, Member State-specific data requested.

<b>Section A1:</b>	Name and address of the producer or of the authorised representative where appointed under Article 17
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Table 3-2: Inclusion of IE *'Name of Producer'* in MS templates

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included in the Registration form	29	AT; BE; BG; HR; CY; CZ; DK; EE; FI; FR; DE; EL; HU; IE; IT; LV; LT <sup>1</sup> ; LU; MT; NL; PT; PL; RO; SK; ES; SI; SE; UK; NO <sup>2</sup>
2.	Additional fields are also included	8	EE; FR; HU; LT; LU; NL; RO; ES

Details:

<sup>1</sup> Lithuania: added 'and/or importer details'.

<sup>2</sup> Norway: Data received from customs IT system automatically

Table 3-3: Inclusion of IE *'Trading name of Producer'* in MS templates

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	11	AT; BE; BG; HR; CZ; FI; EL; HU; IE; MT; UK.
2.	No, not included	13	CY; DK; FR; IT; LV; LT; LU; PL; PT; RO; ES; SE; NO
3.	No information	5	EE; DE; NL; SK; SI

The information element 'Contact person of producer' includes the following attributes: first name; family name; phone number; fax number and email address.

Table 3-4: Inclusion of IE 'Contact person of Producer' in MS templates

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, with <u>all</u> above listed attributes	28	AT; BE; BG; HR; CY; CZ; DK; EE; FI; FR; DE; EL; HU; IE; IT; LV; LT; LU; MT; NL; PT; PL; RO; SK; ES; SI; SE; UK
2.	Yes, included but some attributes are omitted	5	LT; <sup>1</sup> RO; <sup>2</sup> NL; <sup>3</sup> SK; <sup>3</sup> ES <sup>3</sup>
3.	Additional fields are also included	2	LT <sup>4</sup> ; PT <sup>5</sup>
4.	Other	1	NO

Details:

<sup>1</sup>Lithuania: Attributes 'first name' and 'family name' not included in the registration form

<sup>2</sup>Romania: phone and fax number are not included

<sup>3</sup>Netherlands, Slovakia and Spain: fax number is not included

<sup>4</sup>Latvia: Additional field included is mobile number of the producer.

<sup>5</sup>Portugal: National registration form in Portugal includes the following two fields: Classification of Economic Activity (CAE) and period concerned (e.g. date when the company started to place on the market).

**Section A2:** National Identification Code of the producer, including European tax number or national tax number of the producer

The information element on 'National Identification Code of the producer' included types of European tax number and National VAT number. Inclusion of both in the national MS registration templates is presented below.

Table 3-5: Inclusion of IE 'National Identification Code' in MS templates

No.	Inclusion of IE	MS	Details
	Baseline number	29	
1.	Yes, included	24	AT; BE; BG; HR; DK <sup>1</sup> ; EE; FI; FR; EL; IE; IT; LV; LT; MT; NL; PL; PT; RO; SK; SI; ES; SE; UK; NO
2.	No, not included	3	DE <sup>1</sup> ; HU; LU
3.	Also, additional fields	3	FR; HU; PT <sup>2</sup>
4.	No info	1	CY

Details:

<sup>1</sup>Denmark: In Denmark, the first data to be registered about a producer/authorised representative is the company identification code (which

always has a connection to a country). Based on this number the country is automatically given. If it is a Danish number, the name and address of the company is automatically given. The identification code also tells if the company needs an authorised representative or not. (IF DK-no; if EU- shall have; if outside EU-have AR).

<sup>2</sup>Portugal: In line with the comments received during the consultation period in September 2015, national registration form in Portugal includes the following two fields: Classification of Economic Activity (CAE) and period concerned (e.g. date when the company started to place on the market).

Table 3-6: Inclusion of 'National VAT number' in MS templates

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	25	AT; BE; BG; HR;DK; FI; FR; DE; EL; HU; IE; IT; LT; LU; MT; NL; PL; PT; RO; SK; SI; ES; SE; UK; NO
2.	No, not included	2	CZ; LV;
3.	No info received	2	CY; EE;

**Section A3:** Category of EEE set out in Annex I or III, as appropriate

Table 3-7: Inclusion of 'EEE Categories as defined in Annex I' in MS templates

No.	EEE Categories 2012-2018	Yes, included	No, not include	Additional fields	No info received
1.	Large household applications	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT <sup>1</sup> ; LV; LT; LU; MT; NL; PL;PT; RO; SK <sup>2</sup> ; SI; ES <sup>3</sup> ; SE; UK; (26)	AT; NO	FI; EL; LT; SI	CY;
2.	Small household applications	26 MS as above	AT; NO	FI; LT;	CY;
3.	IT and telecommu nications equipment	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT <sup>1</sup> ; LV; LT; LU; MT; NL; PL;PT; RO; SK <sup>2</sup> ; SI; ES <sup>3</sup> ; SE; UK; (25)	AT; NO	FI; EL; LT	CY;
4.	Consumer equipment	26 MS as above	AT; NO	DK; FI; EL; HU; LT;	CY;
5.	Lighting equipment	26 MS as above	AT; NO	DK; FI; LT	CY;

No.	EEE Categories 2012-2018	Yes, included	No, not include	Additional fields	No info received
6.	EE tools	26 MS as above	AT; NO	FI;LT	CY;
7.	Toys, leisure and sports equipment	26 MS as above	AT; NO	FI; LT	CY;
8.	Medical devices	26 MS as above	AT; NO	FI; LT	CY;
9.	Monitoring and control instruments	26 MS as above	AT; NO	FI; LT	CY;
10.	Automatic dispenses	26 MS as above	AT; NO	FI; FR; LT; ES; UK	CY;

Details:

<sup>1</sup>Italy: For each of 10 categories includes list of EEE as defined in Annex II of the Directive

<sup>2</sup>Slovakia: The list of categories and indicative list of WEEE is in separate Annex to act on waste and regulations. The producer by registration must have defined the category, subcategory of EEE and B2B or B2C using.

<sup>3</sup>Spain: The 'old' Spanish legislation (new Royal Decree is adopted on 29 February 2015<sup>37</sup>), regards not the current Directive but to the previous one. The list includes those categories which are specified in the former directive.

Table 3-8: Inclusion of 'EEE Categories as in Annex III' in MS templates

No.	EEE Categories 2012-2018	Yes, included	No, not include	No info received
1.	Large household applications	AT; BE; CY; HR;CZ; EE; HU <sup>2</sup> ;LT; PT; SK <sup>3</sup> ; SI; (11)	DK <sup>1</sup> ; FI; FR; DE; EL; IE; IT; LV; LU; MT; NL; PL; RO; ES; SE; UK; NO (17)	CY
2.	Small household applications	AT; BE; CY; HR;CZ; EE; HU;LT; PT; SI; (10)	DK; FI; FR; DE; EL; IE; IT; LV; LU; MT; NL; PL; RO; ES; SE; UK; NO (17)	CY
3.	IT and telecommunications equipment	10 MS as above	17 MS as above	CY
4.	Consumer equipment	10 MS as above	17 MS as above	CY

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[http://www.magrama.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/royaldecree110\\_2015onweee\\_tcm7-382140.pdf](http://www.magrama.gob.es/es/calidad-y-evaluacion-ambiental/temas/prevencion-y-gestion-residuos/royaldecree110_2015onweee_tcm7-382140.pdf)

No.	EEE Categories 2012-2018	Yes, included	No, not include	No info received
5.	Lighting equipment	10 MS as above	17 MS as above	CY
6.	Electrical and electronic tools	BE; CY; HR;CZ; EE; HU;LT; PT; SI; (9)	As above AT; DK; FI; FR; DE; EL; IE; IT; LV; LU; MT; NL; PL; RO; ES; SE; UK; NO (18)	CY

Details:

<sup>1</sup>Denmark: It will be implemented from 15 August 2018

<sup>2</sup>Hungary: It will be implemented from 2 January 2018

<sup>3</sup>Slovakia: After 2018 categorisation of EEE will be amended

<b>Section A4:</b> Type of EEE (household or other than household equipment)
--

Table 3-9: Inclusion of 'Type of EEE' in MS registration templates

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	25	AT; BE; BG; HR; CZ; DK; EE; FI; FR; DE; EL; HU; IE; IT; LT; LU; MT; NL; PT; RO; SK; SI; ES; SE; UK;
2.	No, not included	3	LV <sup>1</sup> ; PL; NO
3.	No info received	1	CY

Details:

<sup>1</sup>Latvia: The business types of EEE (B2C or B2B) is not distinguished at the category level.

<b>Section A5:</b> Brand name of EEE
--------------------------------------

Table 3-10: Inclusion of 'Brand name of EEE' in MS templates

No.	Brand name	Yes, included	No, not include	Additional fields	No info received
1.	Brand name of EEE	AT; BE; BG; HR; CZ <sup>1</sup> ; DK; EE; FI; DE; EL; IE; IT;LV;MT; NL;PT <sup>2</sup> ;SK;SI;SE;	FR; LT; LU; RO; ES;UK; NO	DK; FR;	CY
1.1.	Brands of EEE	BG; DK;FI;EL; MT; NL; PT;SK; SI;	AT; BE; FR;IE; IT; LV;LT; LU; PL;RO; ES; SE; UK; NO		CY; EE; DE;

No.	Brand name	Yes, included	No, not include	Additional fields	No info received
1.2.	Trademark	AT; BE; BG; DK; EE; FI;EL; MT; SK;	FR; IE; IT; LV;LT; LU; NL; PL; PT; RO; ES;SE; UK; NO		CY; DE; SI

Details:

<sup>1</sup>Czech Republic: It is included in the register of EEE producer

<sup>2</sup>Portugal: the legislation provides for the indication of brand name but this is not yet implemented.

<b>Section A6:</b> Information on how the producer meets its responsibilities
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The information element on 'Extended Producer Responsibility' included data if a producer is member of individual or EPR compliance system and information on the financial guarantee types (i.e. membership in the EPR collective system; blocked bank account; recycling insurance or other type).

Table 3-11: Inclusion of IE 'Information on EPR' in MS registration templates

No.	Info on (EPR)	Yes, included	No, not include	Additional fields	No info received
1.	Info on EPR	AT; BG; HR; CZ; EE; FI; FR; DE;IE;HU; IT; LV; LT;NL;PT <sup>3</sup> ; RO;SK; SI; ES; SE; UK; (21)	DK <sup>4</sup> ; LU;PL;NO (4)	LV; LU	BE; CY;IE; MT; (3)
1.1.	Individual system	AT; BG; HR <sup>1</sup> ; CZ;FR; IE; HU;IT <sup>2</sup> ; LV; LT;MT;NL;PT; RO; SK; SI; ES; SE; UK; (19)	DK; IE;LU; PL;NO		BE; CY; EE; FI;DE; (5)
1.2.	Collective system	AT; BG; HR <sup>1</sup> ; CZ;FR;IE;HU; IE; IT <sup>2</sup> ; LV; LT; MT; NL;PT;RO; SK; SI; ES; SE; UK; (20)	DK; LU;PL;NO (4)		BE; CY; EE; FI; DE; (5)

Details:

<sup>1</sup>Croatia: Individual system/individual fulfilment is allowed only for categories 2, 3 and 4 of Annex 1 of Directive 2012/19/EU. Collective system: currently, the fund is the only model of collective compliance system in Croatia that 'brings together' producers-who are obliged to pay fees, collectors, and waste treatment operators.

<sup>2</sup>Italy: Individual and collective systems for single WEEE.

<sup>3</sup>Portugal: To complete the register, the producer must have a valid contract with a collective system or an individual management system approved for each category of EEE placed on the market.

<sup>4</sup>Denmark: This information is retrieved automatically from the registration. Therefore producers are not asked to give this information separately. The producer cannot choose a type of financial guarantee.

## Section A7: Selling technique used

Table 3-12: Inclusion of IE 'Selling technique' in MS registration templates

No.	Selling technique statement	MS authorities	Details
	Baseline number	29	
1.	Yes, included	21	BG; HR; CZ <sup>1</sup> ; EE; FI; FR; DE; EL; HU; IE; IT; MT; LV;LT; NL; PT <sup>2</sup> ; SK; SI; ES <sup>3</sup> ;UK;
2.	No, not included	6	AT; DK; PL;RO; SE; NO
3.	Additional fields included	2	LT; NL
4.	No info received	3	BE; CY;LU;

### Details:

<sup>1</sup>Czech Republic: It is included in the Register of EEE Producers

<sup>2</sup>Portugal: Foreseen in the legislation but not yet in practice

<sup>3</sup>Spain: This information must be given in advance to the regional government. The regional government decides if the information given is useful or not.

### 3.2.1. Existence of national registers in MS

24 MS reported as having established national register and 3 MS being in the process of setting up the register. 6 MS also reported national specificities with regard to the national register.

Table 3-13: Existence of the national register

No.		MS authorities	Details
	Baseline number	29	
1.	Yes	24	AT; BG; CZ; DK;EE; FR; DE; EL; HU; IE;IT;LV; LT; LU; MT; NL; PL; PT; RO; SK; ES; SE; UK; NO
2.	In process	3	BE; HR; CY;
3.	Other	6	HR; CY; DK; EL; SI; SE

### 3.2.2. Responsibility for managing the national register

In the context of this study, the 'management of the register' means activities and tasks for running 'day-to-day' business of the register. Different organisation are reporting as being responsible for managing the national register.

- 5 MS reported the Ministry or Regional governmental authority as the responsible institution for managing the national register (CZ; FI; MT; SK; ES)

- 11 MS stated responsible National Environmental Protection Agencies (AT; BG; EE; FR; EL; LT; LU; RO; SI; SE; UK)
- 1 MS indicated National association of EEE producers (LV)
- 5 MS (DK; DE; IE; NL; PT) and Norway specified independent entity appointed by the government authority
- 2 MS reported EPR compliance systems (BE; CY)
- 4 MS stated other institutions (HR; HU; IT; PL)

### **3.3. Issues identified related to the registration process**

#### **3.3.1. Issues identified by authorities**

The following issues and problems related to the registration process are reported as the key ones by the authorities:

1. Data related-issues (e.g. quality of data; availability of updated data, etc.) (AT; DK; FI; IT; PL; ES; UK)
2. Identification and registration of producers selling by distance communication (BG; HR; EL; HU; PT)
3. Register-related issues (e.g. register not established; lack of link with Central Business Register; problem with upload of files from collective EPR compliance systems, etc.) (HR; DK; FR; ES; UK)
4. Grey-areas of the WEEE Directive/scoping differences between MS (DE; EL; IT; PT; SI)
5. Lack of knowledge of the obligations of enterprises (IT; MT; PT; ES)

#### **3.3.2. Issues identified by industry representatives**

The following issues and problems related to the registration process are reported as the key ones by the industry representatives:

1. Language barrier when no English translation of legislation is available; difficulties to deal with required documentation and forms.
2. Different requirements for initial registration data requested by each Member State or EPR compliance system. e.g. categorization of EEE to be registered varies by "local" definitions, etc.
3. Interpretation issues:
  - a. Determining requirements for what constitutes an authorised signatory by each Member State or EPR compliance system. This can be an issue for both countries with a local office and those only with distance sales.
  - b. The current interpretation of the authorities on border line products (B2B or B2C) creates an information gap for industrial manufacturers to meet the B2C reporting requirements.
4. Form of submission varies: online (preferred) vs. paper submissions.
5. Duplication of data: Most of the data required for registration is already available in other government databases e.g. company registers, Chambers of Commerce/tax departments, so there is unnecessary duplication of data.



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## 4 Existing practices in the Member States for reporting of EEE producers

This section describes the existing practices in EU-28 Member States and Norway as regards to the *reporting* of EEE producers to the national register. It describes the overall process and which datasets are included in the national MS reporting templates. The issues identified by the authorities and the industry with regard to the *reporting* are also presented.

### 4.1. Reporting process

Similar to the registration process, 4 types of the reporting cases are identified:

First, where producers report directly to the National Register. Currently implemented in 7 MS: Austria, Germany, Portugal, Ireland, Italy, Malta and Slovakia.

Second, where producer report to the selected EPR compliance system, which then reports to the National Register. Currently implemented in 14 MS: Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Greece, Lithuania, Luxembourg, Netherlands, Spain and UK.

Third, where producers can either report directly to the National Register or via its selected EPR compliance system. Currently implemented in 7 MS: France, Hungary, Latvia, Poland, Romania, Slovenia and Sweden.

Fourth, where relevant data are automatically transferred to the national register from the customs or other information systems. This is currently implemented in Norway.

The reporting process differs significantly among the Member States with regard to the roles and responsibilities of involved stakeholders, information to be reported, format, frequency of reporting and submission methods. The responses received from the Member States are sorted according to the following keys:

- **Who** submits and who receives the report
- **In which format** reporting is done to the national register
- **How** report is submitted
- **What is the reporting frequency** of EEE producers and what are the differences on the basis of the type of EEE (B2C and B2B)
- **What is the reporting period** and what are the differences on the basis of the type of EEE (B2C and B2B)

This information is available in Table 4-14 below for each of the 29 national authorities (28 MS + Norway) that participated to the survey.

Table 4-14 MS Reporting Profiles

Country	Who submits Reports		Who receives Reports	In which format Report is submitted to the National register	How report is submitted to the National Register	Reporting frequency		Reporting period	
	Individual system	Collective system				Household Equipment (HE)	Non-HE	HE	Non-HE
AT	Producer	Producer	Federal Environment Agency (UBA); WEEE – Coordination Body (EAK)	Web form; XML format	Online	Quarterly	Annually	No later than 7 weeks after reference quarter	10 April
BE	Producer	EPR	Regional authorities of Flanders, Wallonia and Brussels; Recupel	Web form	Online	Annually	Annually	1 July	1 July
BG	Producer	EPR	Executive Environment Agency	Excel sheet	Email; Postal mail	Quarterly	Quarterly	20 days after reference quarter	20 days after reference quarter
HR	Producer <sup>38</sup>	EPR	Environmental Fund and Energy Efficiency Fund; Environmental Protection Agency	MS Word; Excel sheet	Email; Postal mail	Monthly (to the Fund) & Annually to the Agency	Monthly (to the Fund) & Annually to the Agency	By 5 <sup>th</sup> day of the following month; By 31 <sup>st</sup> March for previous year	By 5 <sup>th</sup> day of the following month; By 31 <sup>st</sup> March for previous year

<sup>38</sup> Croatia: there is no registered EEE producers that opted for individual system of compliance (so called self-fulfillers).

Country	Who submits Reports		Who receives Reports	In which format Report is submitted to the National register	How report is submitted to the National Register	Reporting frequency		Reporting period	
	Individual system	Collective system				Household Equipment (HE)	Non-HE	HE	Non-HE
CY	Producer	EPR	Department of Environment, Ministry of Agriculture, Rural Development and Environment	Excel sheet (IND); Web form (Collective)	Online; Postal mail	Annually	Annually	End of March	End of March
CZ	Producer	EPR	Ministry of Environment, Water management department, Take Back Unit;	XML format	Online in the ISPOP <sup>39</sup> system	Annually	Annually	By 31 March	By 31 March
DK	Producer	EPR <sup>40</sup>	Danish Environmental Agency part of the Ministry of Environment; Danish Producer Responsibility System (DPA-system)	Web form; XML format; CSV files	Online	Annually	Annually	1 January-31 March	1 January-31 March
EE	Producer	EPR	Environmental Agency	Web form; Excel sheet; CSV	Online; Email	Quarterly	Quarterly	By 15 <sup>th</sup> of the following month	By 15 <sup>th</sup> of the following month

<sup>39</sup> Czech Republic: The Ministry of Environment operates the environmental system called ISPOP-information system performance reporting obligations for purposes of reporting. At first the subject has to be registered.

<sup>40</sup> Denmark: Usually, EPR compliance systems report on behalf of their members.

Country	Who submits Reports		Who receives Reports	In which format Report is submitted to the National register	How report is submitted to the National Register	Reporting frequency		Reporting period	
	Individual system	Collective system				Household Equipment (HE)	Non-HE	HE	Non-HE
FI	Producer	EPR <sup>41</sup>	Centre for Economic Development, Transport and the Environment for Pirkanmaa	Web form; PDF document	Online; Email; Postal mail	Annually	Annually	By 30 April	By 30 April
FR	Producer	EPR or Producer	French Environment and Energy Agency (ADEME)	Web form	Online	Annually	Annually	1 February-31 March	1 February-31 March
DE	Producer	Producers	Stifung Elektro-Altgerate register (Stifung Ear)	Web form; MS Word document <sup>42</sup>	Online; Postal mail	Monthly	Annually	15 <sup>th</sup> of the following month	30 <sup>th</sup> April
EL	EPR <sup>43</sup>	EPR	Hellenic Recycling Agency (HRA)	Web form	Online	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
HU	Producer	EPR or Producer	National Inspectorate for Environment and Nature	XML format	Online	Annually	Annually	By 20 <sup>th</sup> February	By 20 <sup>th</sup> February

<sup>41</sup> Finland: Members of producer associations (EPRs) report to their producer association, which in turn report to the National register. Members of the producer associations do not need to report separately to national register.

<sup>42</sup> Germany: Standard procedure is online web-form, where producers are required to report directly to the national register. In a case that a producer/authorised representative has no internet access he can hand in a report in written form.

<sup>43</sup> Greece: Producers, who wish to place EEE on the market, establish a contract of cooperation with one of the two approved EPR compliance systems. Following the establishment of the contract, the producers submit the application for registration through the relevant EPR system. In response to the application, Hellenic Recycling Agency (HRA) registers the producer with the producer-unique registration number, which is referred as the 'National Registration Number'.

Country	Who submits Reports		Who receives Reports	In which format Report is submitted to the National register	How report is submitted to the National Register	Reporting frequency		Reporting period	
	Individual system	Collective system				Household Equipment (HE)	Non-HE	HE	Non-HE
IE	Producer	Producer	WEEE Register Society Ltd.	Web form;	Online	Monthly	Monthly	By 19 <sup>th</sup> of each month	By 19 <sup>th</sup> of each month
IT	Producer	Producer	Chamber of Commerce; National Register of EEE Producer	Web form	Online	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
LV	Producer	EPR or Producer	Ministry of Environmental protection and Regional Development; Latvian Electrical Engineering and Electronics industry association	MS Word; PDF document; Web form	Online; Postal mail	Quarterly	Quarterly	By 15 <sup>th</sup> of the following month	By 15 <sup>th</sup> of the following month
LT	Producer	EPR	Lithuanian Environmental Protection Agency (LEPA)	MS Word; Web form; PDF document	Online; Postal mail; Email	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
LU	Producer	EPR	Environmental Protection Agency Luxembourg	Excel sheet	Email; Postal mail	Annually	Annually	By 30 <sup>th</sup> April	By 30 <sup>th</sup> April
MT	Producer	Producer	The Malta Environmental and Planning Authority (MEPA)	Web form; MS Word document	Online; Submission in-person at the MEPA front desk	Annually	Annually	By 31 <sup>st</sup> March	By 31 <sup>st</sup> March

Country	Who submits Reports		Who receives Reports	In which format Report is submitted to the National register	How report is submitted to the National Register	Reporting frequency		Reporting period	
	Individual system	Collective system				Household Equipment (HE)	Non-HE	HE	Non-HE
NL	Producer	EPR	The National (W)EEE Register	Web form	Online	Annually	Annually	By 1 <sup>st</sup> May	By 1 <sup>st</sup> May
PL	Producer	EPR or Producer	Chief Inspectorate of Environmental Protection	PDF document; MS Word	Postal mail; Email (with electronic signature)	Annually	Annually	By 15 <sup>th</sup> March	By 15 <sup>th</sup> March
PT	Producer	Producer	Portuguese Environment Agency; National Association for Registration of EEE (ANREEE)	Web form; Excel sheet	Online	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
RO	Producer	EPR or Producer	National Environmental Protection Agency (NEPA)	MS Word; PDF document; Web form	Online; Email	Annually	Annually	By 30 <sup>th</sup> April	By 30 <sup>th</sup> April
SK	Producer	Producer	Ministry of Environment	MS Word document	Postal mail	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
SI	Producer	Producer and EPR	Environmental Agency and the Customs Administration	PDF document	Email; Postal mail	Every 6 months	Every 6 months	By 31 <sup>st</sup> March	By 31 <sup>st</sup> March
ES	Producer	EPR	Ministry of Industry, Energy and Tourism	Web form; XML format	Online	Quarterly	Quarterly	35 days following the reference quarter	35 days following the reference quarter

Country	Who submits Reports		Who receives Reports	In which format Report is submitted to the National register	How report is submitted to the National Register	Reporting frequency		Reporting period	
	Individual system	Collective system				Household Equipment (HE)	Non-HE	HE	Non-HE
SE	Producer	Producer or EPR	Swedish Environmental Protection Agency	Web form	Online	Annually	Annually	1 <sup>st</sup> January-31March	1 <sup>st</sup> January-31March
UK	Producer	EPR	Environmental Agency (Regulator England on behalf of other UK regulators)	Web form XML	Online; Email	Quarterly	Quarterly	30 <sup>th</sup> April (Q1) 31 <sup>st</sup> July (Q2) 31 <sup>st</sup> October (Q3) 31 <sup>st</sup> January (Q4)	30 <sup>th</sup> April (Q1) 31 <sup>st</sup> July (Q2) 31 <sup>st</sup> October (Q3) 31 <sup>st</sup> January (Q4)
NO	Producer	Producer and EPR	Norwegian Environment Agency (via Customs authority and Compliance schemas).	CSV format <sup>44</sup>	Not applicable	Quarterly	Quarterly	Not applicable	Not applicable

<sup>44</sup> Norway: All data to the national register are received either from Norwegian Customs or the EPR compliance systems in the so-called "semicolon separated values" format.

## 4.2. Reporting data requested in national MS templates

This section presents information elements (IE) corresponding to the sections of the Annex X, part B, of the Directive, and if they are included in the national MS reporting templates.

Annex C-*'Business analysis and proposal for harmonised data structure and format for Reporting of EEE producer'* contains a detailed analysis of the national Member States reporting templates as mapped against the data as defined in the Annex X, part B of the Directive. The output consists of a common dataset already included by the majority of the MS in their national reporting templates, together with any additional, Member State-specific data requested.

### Section B1: National Identification code of producer

Table 4-15: Inclusion of IE '*National Identification Code*' in MS template

No.	National Identification Code	Yes, included	No, not include	Additional fields	No info received
1.	National Identification Code of producer	AT;BE;BG;CZ;FI;FR;EL;HU;IE <sup>3</sup> ;LV;PL;SK;SI;ES;SE;UK;NO (17)	DK <sup>2</sup> ;DE; LT;PT <sup>4</sup> ;RO;	LV;LT;HU;PL; RO;	CY <sup>1</sup> ;HR;EE; MT;NL;
1.1.	Commercial register number	AT;BE;BG;HR;CZ;EE;FI;HU;IE;IT; LV;MT;SI; (13)	DK <sup>2</sup> ;FR;DE;EL;LT;LU;PT <sup>4</sup> ; RO;ES;SE;UK; NO (12)		CY <sup>1</sup> ;NL;SK; PL;
1.2.	Trade register number	AT;HR;CZ;FI;FR; HU; IE; LV;MT; SK; (10)	BE;DK <sup>2</sup> ;DE;EL;IT;LT; LU; PT <sup>4</sup> ;RO; SI; ES;SE;UK; NO (14)		CY <sup>1</sup> ;EE;NL; PL;

#### Details:

<sup>1</sup>Cyprus: Did not proceed with the new registration/reporting form

<sup>2</sup>Denmark: This information is given during the Registration process. Thus, when a producer sign-in the portal for reporting purpose, the information is already there.

<sup>3</sup>Ireland: Each producer is given a unique user name and password to login in to WEEE Blackbox system to submit its reports.

<sup>4</sup>Portugal: There is no need to ask for this information for reporting since it is general data already communicated during the registration process.



<b>Section B2:</b> Reporting period
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Table 4-16: Inclusion of IE 'Reporting period' in MS reporting template

No.	Reporting period	MS authorities	Details
	Baseline number	29	
1.	Monthly	3	HR <sup>2</sup> ; DE <sup>3</sup> ; IE;
2.	Quarterly	7	AT <sup>1</sup> ; BG; HR <sup>2</sup> ; EE; LV; ES; UK; <sup>5</sup> NO
3.	Every 6 months	1	SI <sup>4</sup> ;
4.	Annually	24	AT <sup>1</sup> ;BE; CY; HR <sup>2</sup> ; CZ; DK; FI; FR;DE <sup>3</sup> ; EL; HU; IT;LT; LT; LU; MT; NL; PL; PT; RO; SK;SI <sup>4</sup> ;SE; UK <sup>5</sup> ;

Note: Several MS have more than one reporting period.

<sup>1</sup>Austria: Quarterly and annually

<sup>2</sup>Croatia: Reporting on monthly, quarterly and annual basis.

<sup>3</sup>Germany: Quarterly and annually

<sup>4</sup>Slovenia: Every 6 months and annually.

<sup>5</sup>UK: Quarterly and annually

Table 4-17: Reporting frequency and period of reporting as per national MS legislations

No.	Country	Reporting frequency		Period of reporting	
		Household Equipment (HE)	Other than HE	Household equipment (HE)	Other than HE
1.	AT	Quarterly	Annually	No later than 7 weeks after reference quarter	10 April
2.	BE	Annually	Annually	1 July	1 July
3.	BG	Quarterly	Quarterly	20 days after reference quarter	20 days after reference quarter
4.	HR	Monthly (to the Fund) & Annually to the Environment Agency	Monthly (to the Fund) & Annually to the Environment Agency	By 5 <sup>th</sup> day of the following month; By 31 <sup>st</sup> March for previous year	By 5 <sup>th</sup> day of the following month; By 31 <sup>st</sup> March for previous year
5.	CY	Annually	Annually	End of March	End of March
6.	CZ	Annually	Annually	By 31 January	By 31 March
7.	DK	Annually	Annually	1 January-31 March	1 January-31 March
8.	EE	Quarterly	Quarterly	By 15 <sup>th</sup> of the following month	By 15 <sup>th</sup> of the following month
9.	FI	Annually	Annually	By 31 January	By 31 January
10.	FR	Annually	Annually	1 February-31 March	1 February-31 March
11.	DE	Monthly	Annually	15 <sup>th</sup> of the following month	30 <sup>th</sup> April
12.	EL	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
13.	HU	Annually	Annually	By 20 <sup>th</sup> February	By 20 <sup>th</sup> February
14.	IE	Monthly	Monthly	By 19 <sup>th</sup> of each month	By 19 <sup>th</sup> of each month
15.	IT	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January

No.	Country	Reporting frequency		Period of reporting	
		Household Equipment	Other than HE	Household Equipment	Other than HE
16.	LV	Quarterly	Quarterly	By 15 <sup>th</sup> of the following month	By 15 <sup>th</sup> of the following month
17.	LT	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
18.	LU	Annually	By 30 <sup>th</sup> April	By 30 <sup>th</sup> April	Annually
19.	MT	Annually	Annually	By 31 <sup>st</sup> March	By 31 <sup>st</sup> March
20.	NL	Annually	Annually	By 1 <sup>st</sup> May	By 1 <sup>st</sup> May
21.	PL	Annually	Annually	By 15 <sup>th</sup> March	By 15 <sup>th</sup> March
22.	PT	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
23.	RO	Annually	Annually	By 30 <sup>th</sup> April	By 30 <sup>th</sup> April
24.	SK	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
25.	SI	Every 6 months	Every 6 months	By 31 <sup>st</sup> March	By 31 <sup>st</sup> March
26.	ES	Quarterly	Quarterly	35 days following the quarter	35 days following the quarter
27.	SE	Annually	Annually	1 <sup>st</sup> January-31March	1 <sup>st</sup> January-31March
28.	UK	Quarterly	Quarterly	30 <sup>th</sup> April (Q1); 31 <sup>st</sup> July (Q2); 31 <sup>st</sup> October (Q3); 31 <sup>st</sup> January (Q4)	30 <sup>th</sup> April (Q1); 31 <sup>st</sup> July (Q2); 31 <sup>st</sup> October (Q3); 31 <sup>st</sup> January (Q4)
29.	NO	Quarterly	Quarterly	Not applicable	Not applicable

**Section B3:** EEE Categories as per Annex I or III as appropriate

Table 4-18: Inclusion of IE 'EEE Categories as per Annex I' in MS reporting

No.	EEE Categories 2012-2018	Yes, included	No, not include	Additional fields added	No info received
1.	Large household applications	BE; BG; HR; CZ;DK <sup>1</sup> ;EE; FI; FR; DE; EL; HU; IE; IT <sup>2</sup> ; LV; LT; LU <sup>3</sup> ; MT; NL PL;PT; RO; SK <sup>4</sup> ; SI; ES; SE; UK;	AT; NO <sup>5</sup>	EE; EL; LV; LT; RO; SI	CY; NL
2.	Small household applications	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT <sup>1</sup> ; LV; LT; LU; MT; NL PL;PT; RO; SK <sup>2</sup> ; SI; ES <sup>3</sup> ; SE; UK;	AT; NO	LT; RO	CY; NL
3.	IT and telecommunication equipment	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT; LV; LT; LU; MT; NL PL;PT; RO; SK; SI; ES; SE; UK; (26)	AT; NO	EL; LV; LT; RO	CY; NL
4.	Consumer equipment	26 MS as above	AT; NO	DK; FR; FI; EL; HU; LV; LT;RO	CY; NL
5.	Lighting equipment	26 MS as above	AT; NO	DK; EE;EL; LV; LT;RO;SI	CY; NL
6.	EE tools	26 MS as above	AT; NO	LT;RO	CY; NL
7.	Toys, leisure and sports equipment	26 MS as above	AT; NO	LT; RO	CY; NL
8.	Medical devices	26 MS as above	AT; NO	LT; RO	CY; NL
9.	Monitoring and control instruments	26 MS as above	AT; NO	LT; RO	CY; NL
10.	Automatic dispensers	26 MS as above	AT; NO	LT; RO; UK	CY; NL

Details:

<sup>1</sup>Denmark: The categories that were given during registration is automatically given to the producer for reporting. So they are not asked to re-enter the categories. They can choose new categories or delete categories. So, the producer goes directly to section "B4: Quantity of EEE placed on the national market by weight"

<sup>2</sup>Italy: List of equipment per each of 10 categories as defined in the Annex II

<sup>3</sup>Luxembourg: Reporting is per sub-category of each of 10 categories. Also, per each category, producer needs to provide information on total equipment: date, signature and stamp, registration number, category. Cat.1: Large household appliances has 18 subcategories; Cat2: Small household appliances has 12 subcategories; Cat3: IT and telecommunications equipment has 21 subcategories; Cat4: Consumer equipment (8); Cat5: Lighting equipment (6); Cat6: Electrical and electronic tools (8); Cat7: Toys, leisure and sports equipment (6) subcategories; Cat8: Medical devices (with the exception of all implanted and infected products)(10); Cat9: Monitoring and Controlling instruments (5) subcategories and Cat10: Automatic dispensers( 5).

<sup>4</sup>Slovakia: In each category, there are defined some subcategories. For this producer has to report required data.

<sup>5</sup>Norway: Data for 10 categories are derived from CN-numbers (data collected from the customs IT system)

Table 4-19: Inclusion of IE 'EEE Categories as per Annex III' in MS Reporting

No.	EEE Categories as per Annex III	Yes, included	No, not include	No info received
1.	Temperature exchange equipment	AT; BE; HR;CZ; EE; HU <sup>2</sup> ;LT; PT <sup>3</sup> ; SK <sup>4</sup> ; ES (10)	DK <sup>1</sup> ; FI; FR; DE; EL; IE; IT; LV; LU; MT; PL; RO; SI; SE; UK; NO (16)	BG; CY NL;
2.	Screens, monitors	As above (10)	As above (16)	BG; CY NL;
3.	Lamps	As above (10)	As above (16)	BG; CY NL;
4.	Large equipment	As above (10)	As above (16)	BG; CY NL;
5.	Small equipment	As above (10)	As above (16)	BG; CY; NL
6.	Small IT and telecommunications equipment	BE; HR;CZ; EE; HU <sup>2</sup> ;LT; PT <sup>3</sup> ; SK <sup>4</sup> ; ES (9)	AT; DK; FI; FR; DE; EL; IE; IT; LV; LU; MT; NL; PL; RO; ES; SE; UK; NO (17)	BG; CY NL;

Details:

<sup>1</sup>Denmark: It will be implemented in 2018

<sup>2</sup>Hungary: It will be implemented from 2 January 2018

<sup>3</sup>Portugal: These categories are planned in the new WEEE legislation

<sup>4</sup>Slovakia: In each category there are defined some subcategories.

**Section B4:** Quantity of EEE Placed on the Market (EEE PoM)

Table 4-20: Inclusion of IE 'Quantity of EEE PoM' in MS Reporting templates

No.	Inclusion in MS Reporting form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	25	AT; BE; BG;HR; DK; EE; FI;FR; DE; EL;HU; IE; IT; LT; LU; MT, PL; PT; RO;SK;SI; ES; SE; UK; NO
2.	No, not included	2	CZ; LV;
3.	No info provided	2	CY; NL;

**Section B5:** Quantity of WEEE separately collected, recycled, recovered and disposed

Table 4-21: Inclusion of IE 'WEEE separately collected' in MS Reporting

No.	Inclusion in MS Reporting form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	20	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; LV; LU; MT; RO;SK; SE; UK;
2.	No, not included	6	LT; EL; PL; ES <sup>2</sup> ; NO <sup>3</sup> ; PT <sup>4</sup>
3.	Other	1	SI <sup>1</sup> ;
4.	No info provided	2	CY; NL;

Details:

<sup>1</sup>Slovenia: This information on collected, recycled, recovered and disposed WEEE is not part of the registration form but it is in the Report on WEEE management that is prepared by the EPR compliance systems on behalf of their producers. So producer does not submit this information directly to the authority.

<sup>2</sup>Spain: The Ministry of Industry is only responsible for EEE producer register. That means new products. The ministry of industry is *not responsible* of the recycling, waste or residues data, it is a competency of Ministry of Agriculture, Food and Environment that compiles the environmental information and send it to the European Commission as per article 16.4 and 16.5

<sup>3</sup>Norway: This information is reported from the EPR compliance systems (or else mentioned as PROs) on aggregate scale, not on each producer.

<sup>4</sup>Portugal: This information is foreseen in the national legislation, but not included in the national reporting forms because it is data reported by the EPR compliance systems to the national authority on aggregate scale, not by each producer.

Table 4-22: Inclusion of IE 'WEEE Recycled, Recovered and Disposed' in MS

No.	Inclusion in MS Reporting form	Yes, it is included	No, not included	No info provided
1.	WEEE Recycled	AT; BE; BG;HR;CZ; DK; EE; FI;FR; DE;HU; IE; IT; LV; MT; SK; SE; UK; (18)	EL; LT; LU; PL; RO; ES; PT; NO (8)	CY; NL;SI (3)
2.	WEEE Recovered	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; SK; SE; UK; (16)	EL; LV; LT; LU; MT; PL;RO; ES; PT; NO (10)	CY; NL;SI (3)
3.	WEEE disposed in MS	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; LV; MT; SK; SE; (17)	EL; LT; LU; PL;RO; ES; PT; NO; UK (9)	CY; NL;SI (3)

Table 4-23: Inclusion of IE 'WEEE shipped' in MS reporting templates

No.	Inclusion in MS Reporting form	Yes, it is included	No, not included	No info provided
1.	WEEE Shipped inside EU	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE; IE; IT; LV; MT; SK; SE; (16)	EL; HU; LT; LU; PL;RO; ES; PT; UK; NO (10)	CY; NL;SI (3)
2.	WEEE Shipped outside EU	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; SK; (14)	EL; LV; LT; LU; MT; PL;RO; ES; PT; SE; UK NO (12)	CY; NL;SI (3)

### 4.3. Issues identified related to reporting

#### 4.3.1. Issues identified by authorities

The following issues and problems related to the reporting are identified as the key ones by the authorities:

1. Problem with existing IT system or lack of IT system for reporting (BE; DK; SK; ES; UK; HR; FR)
2. Accuracy and reliability of data (HR; CZ; DK; FI; HU; MT; PL; PT; ES; UK)
3. Completeness of required documentation and/or no respect for deadlines (e.g. no signature, lack of proof of fee payment, etc.) (CZ; HU; FR; PL)
4. Lack of guidance for categorization of EEE (EL; PL; RO)
5. Diversity of reports needed –between MS and/or required by the register and the EPR compliance system (DE; IE; PT)

### **4.3.2. Issues identified by industry representatives**

The following issues and problems related to the reporting are identified as the key ones by the industry representatives:

1. Different information requested, using different criteria (kg, tonnes, equipment size, presence of display, battery inclusion information, etc.)
2. Information cannot be submitted always in English or reporting tools are available only in national language(s).
3. Different formats used: on-line, paper documents etc.
4. Different frequency– monthly, quarterly, annually
5. No harmonised approach on scope and categorisation
6. Some reports needs to be verified by financial auditors, who are not familiar with the requirements.
7. Figures reported by waste processors cannot be retraced since there is no system of keeping detailed records at the time of collection. So output cannot be compared with input.
8. No plausibility check at the register for the information reported by producer and/or collective EPR compliance systems. This may lead to problems in matching the data with volume of the guarantees every producer have to provide to the register.



## 5 Harmonised format for registration

This section presents the data requirements for harmonised structure and format based on the stakeholders inputs and Annex X, Part A of the Directive. The structure is presented in a business-friendly way following the naming of the sections as given in the Directive.

Following these requirements, defined business entities, their properties and relationships are presented in the data model and in the UML-based diagrams as given in the Section 7 of this report.

### 5.1. Benefits of the harmonised format for registration

A number of benefits have been identified by the MS and industry for having in place a harmonised data structure and format for registration of EEE producers to the national register.

#### 5.1.1. Benefits identified by authorities

The following benefits of having harmonised format for registration of EEE producers are identified by authorities:

Table 5-24: Authorities opinion on benefits of the harmonised registration

No.	Country	Benefits of the harmonised structure and format for registration process
1.	Belgium	Harmonisation between Member States
2.	Croatia	Easier and more accurate registration and reporting; More effective supervision; more efficient data processing; More effective coverage of EEE producers selling by distance communication; more effective charging of prescribed fees
3.	Germany	Decreasing costs; Decreasing mistakes; Less bureaucracy
4.	Latvia	Identical registration form and requirements in all MS A common understanding of the importance of information Facilitated registration of foreign producer
5.	Netherlands	When a producer has to register in different countries, the registration should be similar everywhere. Less administrative burden Easier inspection by competent enforcement authorities Easier to calculate data, (addition) to a national level. No misunderstanding and discussions about definitions
6.	Portugal	Reduces unnecessary administrative burden for producers; Promotes interoperability of national registers; More control over free-riders.

No.	Country	Benefits of the harmonised structure and format for registration process
7.	Slovakia	Protection from free riders Possible checking of product what the Producer place on the market Cross check of EEE categorisation and classification of household and non-household EEE
8.	Slovenia	Harmonization of the registration process within EU Better and clear legislation framework More effective monitoring/supervision/infringements (especially in case of distance selling) Reduction of administration requirements
9.	Spain	You can give the same information for everyone. The ministry does not need to have staff dealing with data base as producers and SIGs do the job on line Calculations are generated automatically.

### 5.1.2. Benefits identified by industry representatives

The following are benefits as identified by some industry representatives for having a harmonised format for registration of EEE producers:

- Reduced administrative burden associated with determining what unique information a Member State or EPR compliance system requires to register and where to find this information.
- Reduced internal investment to manage required data.
- Reduced administrative burden to determine what specific authorisation level is required by Member State or EPR compliance system to sign registration documentation.
- Possibility of designating a single authorised signatory across all Member States would greatly reduce communication issues.
- Standardization would enable Member States to share translations and enable better multi-language interface. Both cost efficiency and greater regulatory certainty result from Member States providing official translations instead of each company individually sourcing unauthorised translations directly.
- Harmonized information structures would lead to automation, enabling more efficient extraction of needed data for both registration and regular reporting activities.
- Overall improvement of data quality and integrity, enabling better comparisons between Member States.

## 5.2. Harmonised structure and format for registration

This section presents proposed harmonised structure and format for *registration* of EEE producers. The data fields indicated with '(M)' are mandatory fields that must be included by the national authorities in their national templates and corresponding registry systems. On the other side, the data fields indicated with '(V)' are fields that can be included by the national authorities on the voluntary basis.

This proposed harmonised structure and format for registration will serve as a basis for the implementing act to be developed by the Commission under the Article 16(3) of the Directive.

### A1: Name and address of the Producer or Authorised Representative

#### PRODUCER

##### 1. Producer

###### 1.1. Name of Producer (M)

###### 1.1.1. Producer – Company

###### 1.1.1.1. Name of the Company

###### 1.1.2. Producer-Natural person (M)<sup>45</sup>

###### 1.1.2.1. First name (M)

###### 1.1.2.2. Last name (M)

###### 1.2. Trading Name of Producer (V)

###### 1.3. Type of Producer (V)<sup>46</sup>

###### 1.3.1. Manufacturer selling products manufactured in the MS under his own name or trademark

###### 1.3.2. Importer (importing from another EU Member State)

###### 1.3.3. Importer (importing from a third country)

###### 1.3.4. Distance seller<sup>47</sup>

<sup>45</sup> Denmark and Hungary suggested to exclude the possibility of a producer being a natural person. However, noting the definition of a producer and taking into account that in other MS (e.g. Germany) number of producers-natural person could be significant, it is proposed to keep this data requirement mandatory.

<sup>46</sup> This information is introduced on a voluntary basis, meaning, that MS may introduce this typology of producers into their national registration forms. While some MS (e.g. Germany, Denmark) expressed its opinion of no relevancy or purpose for this information, other countries (e.g. Croatia, Spain, Malta) support inclusion of this information with objective of traceability, for example, producers from another EU MS and producers from third countries. Thus, this information is kept at the voluntary basis.

<sup>47</sup> Noting the comments received from some MS (e.g. Denmark, Malta, Spain), distance seller in the context of this study is defined a type of producer that sells by means of distance communication and is established

1.3.4.1. Distance seller established in another MS

1.3.4.2. Distance seller established in non-EU country

**1.4. Legal Address of Producer (M)**

1.4.1. Street name (M)

1.4.2. Street number (M)

1.4.3. Postal code (M)

1.4.4. Location/City (M)

1.4.4.1. Province (V)

1.4.4.2. Municipality (V)

1.4.5. Country (M)

1.4.6. Website address (V)

**1.5. Contact person of Producer (M)<sup>48</sup>**

Proposed definition of Contact person = "Contact person means a person associated with a company as a point of communication. It is a particular individual within a company or other organization who is selected as the point of initial or regular communication with that organization or its concerns."<sup>49</sup>

1.5.1. First name (M)

1.5.2. Last name (M)

1.5.3. Phone number (M)

1.5.4. Mobile phone number (V)

1.5.5. Fax number (M)

1.5.6. Email address (M)

**2. Authorised Representative (AR)**

Authorised Representative means any natural or legal person established in the Member State who, explicitly designated by a Producer established in another Member state or a third country and who acts instead of the

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in another Member State or in a third country. This means that any distance seller established in its home country, who sells EEE to another MS in which is not established, would need to appoint Authorised Representative in that MS as the responsible for fulfilling the obligations of that producer.

<sup>48</sup> During the Workshop discussion held on 22 June 2015, stakeholders raised importance of having the contact details of the person responsible for registration by the producer and proposed its inclusion at the mandatory level.

<sup>49</sup> Source: Phorio standards; <http://standards.phorio.com/?t=definition&code=5835270378>; cited on 24/06/2015

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Producer with regard to the latter's obligation under this Directive in that Member State.<sup>50,51</sup>

**2.1.**Name of Authorised Representative (M)

2.1.1. Authorised Representative- Legal person (M)

2.1.1.1. Name of the Company (M)

2.1.2. Authorised Representative- Natural person (M)

2.1.2.1. First name (M)

2.1.2.2. Last name (M)

**2.2.**Contact person of the Authorised Representative (M)

2.2.1. First name (M)

2.2.2. Last name (M)

**2.3.**Address of the Authorised Representative (M)

2.3.1. Street name (M)

2.3.2. Street number (M)

2.3.3. Postal code (M)

2.3.4. Location/City (M)

2.3.4.1. Province (V)

2.3.4.2. Municipality (V)

2.3.5. Country (M)

2.3.6. Website address (V)

**2.4.**National Identification Code of Authorised Representative (M)

2.4.1. National VAT Number (M)

2.4.2. European tax (VAT) Number (V)

2.4.3. National Registration Number (V), if Producer is a Legal person

2.4.4. National Registration Number (M), if Producer is a Natural person<sup>52</sup>

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<sup>50</sup> This definition of AR is inspired by the definition of AR given in the DG SANCO Guideline document for Authorised Representatives from January 2012, in the context of the EC Directive on Medical devices. This document has been also mentioned in the EWRN Proposal for implementation of AR from June 2013.

<sup>51</sup> Further updated definition as per suggestion received from Malta during consultation period in September 2015.

**2.5.** Name of the Producer that is represented (M)

## 2.5.1. Producer-Legal person

## 2.5.1.1. Name of the company

## 2.5.2. Producer-Natural person

## 2.5.2.1. First name

## 2.5.2.2. Last name

**2.6.** Contact details of the Producer that is represented (M)

## 2.6.1. Phone number (M)

## 2.6.2. Mobile number (V)

## 2.6.3. Fax number (M)

## 2.6.4. Email address (M)

**2.7.** National Identification Code of the Producer that is represented (M)<sup>53</sup>

## 2.7.1. National VAT number (M)

## 2.7.2. European tax number (V)

## 2.7.3. National Registration Number (V), if Producer is a Natural person

## 2.7.4. National Registration Number (M), if Producer is a Legal person

**2.8.** Date of authorisation<sup>54</sup>

## 2.8.1. Date of authorisation given to the Authorised Representative by the Producer (M)

**A2: National Identification Code of the Producer**

1. National VAT Number (M)
2. European tax (VAT) Number (V)

<sup>52</sup> Noting that in case of an Authorised Representative-Natural person, the VAT number will not be available, but rather the national registration number (e.g. from the Chamber of Commerce in Germany, Croatia, etc.), this field is indicated as mandatory. This number could be for example, registration number from the national Chamber of Commerce (Germany, Croatia, Netherlands, Italy), or Register of businesses, or Registration number issued by the national register/IT application after providing the log-in credentials (Ireland, Portugal, Denmark, etc.).

<sup>53</sup> Following suggestion of some MS (e.g. Denmark, Spain) it is included the National Identification Code of Producer at the mandatory level in the template.

<sup>54</sup> Date of authorisation refers to the date of the agreement signed between the Producer and the Authorised representative. During the stakeholders workshop held on 22 June 2015, it has been highlighted as important for the enforcement purposes.

3. National Registration Number (V), if Producer is a Legal person
4. National Registration Number (M), if Producer is a Natural person

### **A3: Category of EEE set out in Annex I or III as appropriate**

#### **1. EEE Categories as per Annex I or Annex III as appropriate (M)**

- 1.1. Annex I: 10 categories of EEE during the transition period, i.e. until 14 August 2018 (M)
- 1.2. Annex III: 6 categories after the transition period, i.e. from 15 August 2018 (M)

#### **2. EEE Sub-categories (V)**

### **A4: Type of EEE (household or other than household equipment)**

For each of 10 EEE categories during the transition period (until 2018) or 6 categories of EEE from 15 August 2018 it should be provided the following information:

1. Household EEE (M)
2. Other than household EEE (M)

### **A5: Brand name of EEE**

The Producer is obliged to provide Brand name of EEE by the category of EEE.

1. Brand name of EEE (M)

### **A6: Extended Producer Responsibility (EPR)**

The Producer will indicate how s/he meets its responsibilities, i.e. individual or collective system. Below requested information will be mandatory at the EEE category level.

#### **1. Extended Producer Responsibility (EPR) (M)**

- 1.1. Individual system (M)
  - 1.2. Collective system (M)
    - 1.2.1. Name of the EPR compliance system (M)
    - 1.2.2. Date of agreement between the Producer and EPR compliance system (M)

“In case of the ceased activities and/or change of the selected system (individual or collective), the Producer is obliged to inform the responsible national authority at the earliest possibility and no later than 30 days after the change of producer

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responsibility system and/or company ceased activities of EEE placing on the market." (M)

2. **Information on the Financial guarantee as appropriate (M)**

2.1. Membership in the EPR compliance system

2.2. Recycling insurance

2.3. Blocked bank account

2.4. Other

**A7: Selling technique used**

The Producer based in the MS where is placing on the market will indicate at the category level if is also using distance selling technique, in which countries and also identity of AR in those countries. All information will be mandatory.

1. Using Distance selling technique (yes/no) (M)
2. List of countries in which the Producer sells by distance selling technique (M)
3. Name of Authorised Representative in the countries in which the Producer sells by distance selling (M)

**A8: Declaration**

"I/We declare that the information provided in this document is true and provides an accurate reflection of the type of EEE placed on the market by the above named organisation." (M)



## 6 Harmonised format for reporting

This section presents the data requirements for harmonised information structure based on the stakeholders' inputs and Annex X, Part B of the Directive. The structure is presented in a business-friendly way following the naming of the sections as given in the Directive.

Following these requirements, business entities, their properties and relationships are presented in the data model and in the UML-based diagrams as given in the Section 7 of this report.

### 6.1. Benefits of harmonised format for reporting

#### 6.1.1. Benefits identified by authorities

A number of benefits have been identified by national authorities for having in place a harmonised data structure and format for reporting of EEE producers.

Table 6-25: Benefits of harmonised format for reporting identified by authorities

No.	Country	Benefits of the harmonised structure and format for reporting process
1.	Germany	Decreasing costs; Decreasing mistakes; Less bureaucracy
2.	Latvia	Identical report forms and requirements in all MS Data compatibility; Preferential data communication
3.	Netherlands	The way to organise and report on collection and treatment should be similar in all EU countries. A harmonised information structure and a format for reporting process contributes to an equal approach by all Member States. Comparison of results between MS becomes accessible.
4.	Portugal	Simplification; Reduces unnecessary administrative burden for producers; Promotes interoperability of national registers; More reliable data at the EU level.
5.	Spain	Everyone can report from his/her company. The ministry does not need to have staff dealing with database, producers and ERP compliance systems (called SIGs in Spain) can do the job online. Calculations are generated automatically. Rates are sent automatically to the stakeholders Everyone can follow his own data on internet.

### 6.1.2. Benefits identified by industry

Industry representatives stated the following benefits of a harmonised dataset and format for reporting:

1. A single type of electronic reporting interface could be developed, enabling consistent reporting process across Member States. Currently different Member States use different formats from web sites to Excel, Word or PDF documents that are signed and mailed in, greatly complicating the process of routine compliance.
2. Consistent formatting and requirements would also enable the Member States to provide a set of official translations to legislation, forms and web interfaces to better facilitate compliance by distance sellers and multinational sellers with no local presence. Costs could be shared across the Member States if a pan-European reporting format were agreed.
3. A common format for data allows process automation on the producer side that is not currently possible.
4. Types of items reported would be the same, preventing current need to designate Member State-specific categorization of products. Due to variability among Member States requirements, the same product may be placed into at least three different categories (e.g. display product, product under 50 cm, Category 9 monitoring and control equipment) for collated reporting. Maintaining the status quo forces the producer to collect all of this information for each piece of equipment and to develop three different methods of reporting sales quantities rather than just one.
5. Enables the enforcement of consistent reporting periods across the Member States and EPR compliance systems, allowing for better resource allocation on the producer's side.
6. A harmonised information structure will help reducing internal investment to manage required data and will improve reporting integrity.

### 6.2. Harmonised structure and format for reporting of EEE producers

This section presents the proposed harmonised structure and format for *reporting* of EEE producers. The data fields indicated with '(M)' are mandatory fields to be included by the national authorities in their national templates and corresponding registry systems. On the other side, the data fields indicated with '(V)' are fields that can be included by the national authorities on the voluntary basis.

This proposed harmonised structure and format for registration will serve as a basis for the implementing act to be developed by the Commission under the Article 16(3) of the Directive.

### **B1: National Identification Code of the producer**

1. National VAT number (M)
2. European VAT number (V)
3. National Registration Number (V), for Producer as a Legal person
4. National Registration Number (M) for Producer as a Natural person.

### **B2: Reporting period**

Proposed reporting frequency of EEE Producers to the National register is on **Quarterly** basis (M) for household and other than household equipment. The period of reporting proposed is **30<sup>th</sup> of the month** following the respective quarter.

### **B3: Category of EEE set out in Annex I or Annex III as appropriate**

1. Annex I: 10 categories of EEE during the transition period, i.e. until 14 August 2018 (M)
2. Annex III: 6 categories after the transition period, i.e. from 15 August 2018 (M)
3. EEE Sub-categories (V)

### **B4: Quantity of EEE laced on the national market (PoM), by weight**

For each of 10 EEE categories during the transition period (until 2018) or 6 categories of EEE from 15 August 2018 it should be provided the following information:

1. Household EEE (M)
2. Other than household EEE (M)
3. Weight in kilograms (kg) (M)

### ***B5: Quantity, by weight, of Waste of EEE (WEEE), separately collected, recycled (including prepared for re-use), recovered and disposed of within the Member State of shipped within or outside the Union.***

The following information elements/entities will be mandatory for reporting at the EEE category level and quantities expressed in kilograms.

1. WEEE separately collected (M)
  - a. Household equipment
  - b. Other than household equipment
2. WEEE Recycled, Recovered and Disposed (M)
  - a. WEEE Recycled (M)
  - b. WEEE Recovered (M)
  - c. WEEE Disposed (M)
3. WEEE Shipped (M)
  - a. WEEE shipped within the Union
  - b. WEEE shipped outside the EU

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## 7 Harmonised data model for registration and reporting

This section gives a brief description of what is a data model and presents three UML diagrams corresponding to the information structure and format for registration and reporting of EEE producers.

First diagram, 'Producer-Authorised Representative' depicts the data required and their cardinality<sup>55</sup> with regard to the relationship between a producer and its authorised representative (if appointed). (Section 7.2)

Second diagram, 'Extended Producer Responsibility' indicates how a producer meets its obligations, i.e. individually or as a member of an EPR compliance system, if uses distance selling technique and has an appointed authorised representative. The diagram shows the data required for each of specific entities and the relationships between these entities. (Section 7.3)

Third diagram, 'PoM & WEEE Reporting' describes a producer responsibility to report on the EEE placed on the market and on WEEE collected, recycled, recovered, disposed and shipped. (Section 7.4)

Important to highlight that these diagrams does not define or describe the business process itself, but visualise the business data involved in the process. For example, the diagram does not define how business process of reporting to the national register is carried out, i.e. directly by a producer or via an appointed EPR compliance system, but which data have to be provided to the authority.

### 7.1. Data model

A data model is a visual representation of the people, places and things of interest to a business. It is used to facilitate communication between business people and technical people. A data model is composed of symbols that represent the concepts that must be communicated and agreed upon and is therefore often referred to as a blueprint for data. Like a building architect, who creates a series of diagrams or blueprints from which a house can be constructed, a data modeller/architect creates diagrams from which a database may be built.<sup>56</sup>

A domain model, in software engineering, is a conceptual model that incorporates relevant data for specific business. The model for registration and reporting contains meaningful concepts pertinent to the business of (W)EEE that could be modeled in a software.

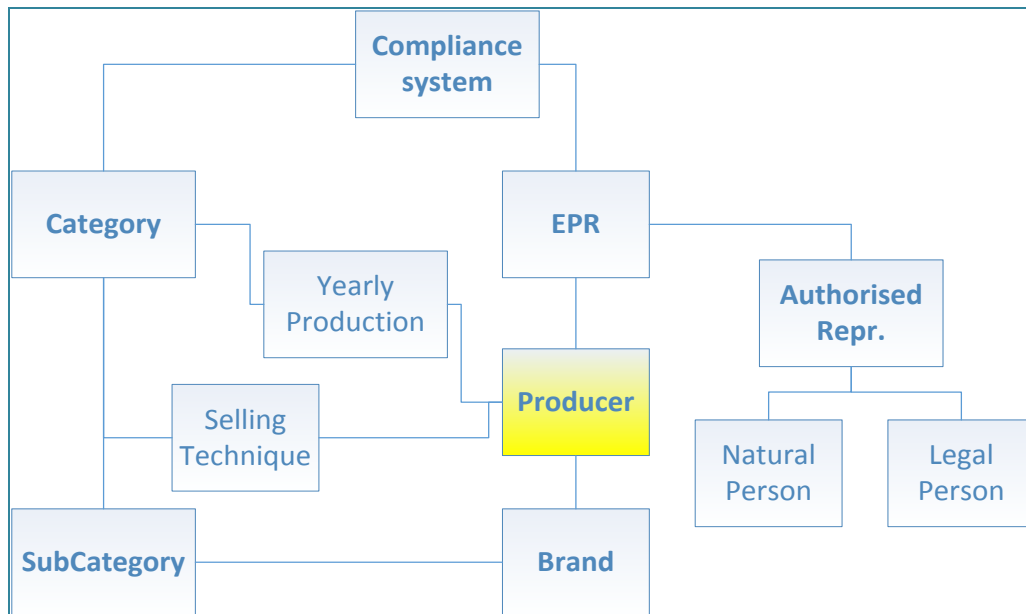
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<sup>55</sup> In data modeling, explaining how each table links to another is known as cardinality. Tables can be related as any of: one-to-one, one-to-many, or many-to-many. Source: <http://www.databasejournal.com/features/mysql/article.php/3906761/Cardinality-in-MySQL-Data-Modeling.htm>

<sup>56</sup> Steve Hoberman, Donna Burbank, Chris Bradley. Data Modeling for the Business: A Handbook for Aligning the Business with IT. Bradley Beach, NJ: Technics Publications, LLC, 2009.

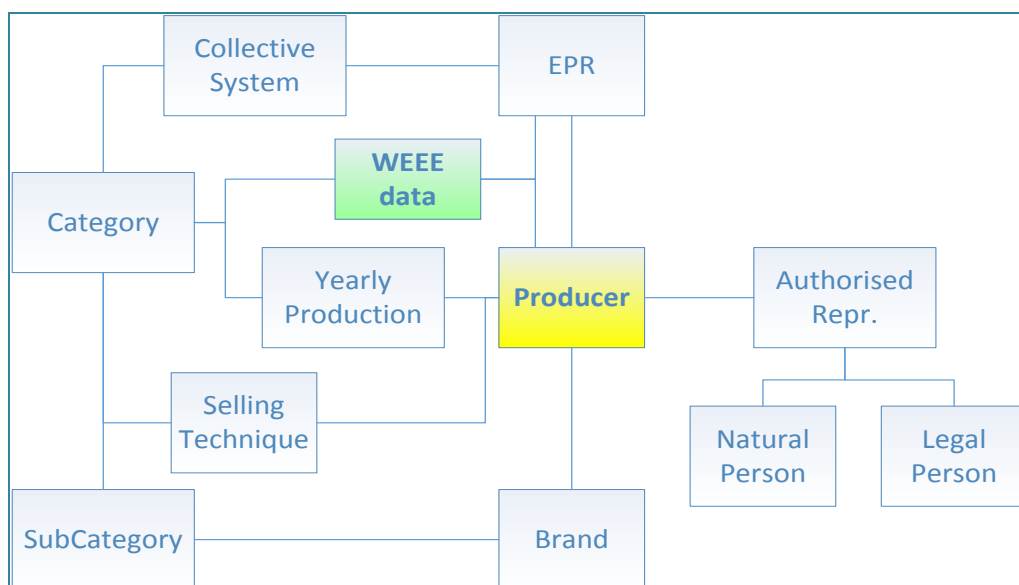
### 7.1.1. High-level object domain model for registration

The domain model for **registration** gives an overview of the relevant concepts, i.e. producer, authorised representative, selling technique, EPR compliance system, etc. involved in the business process of registration. Each of these concepts include the relevant data (e.g. name of producer, national VAT number, etc.) and certain relationship between these concepts (e.g. producer-producer type).

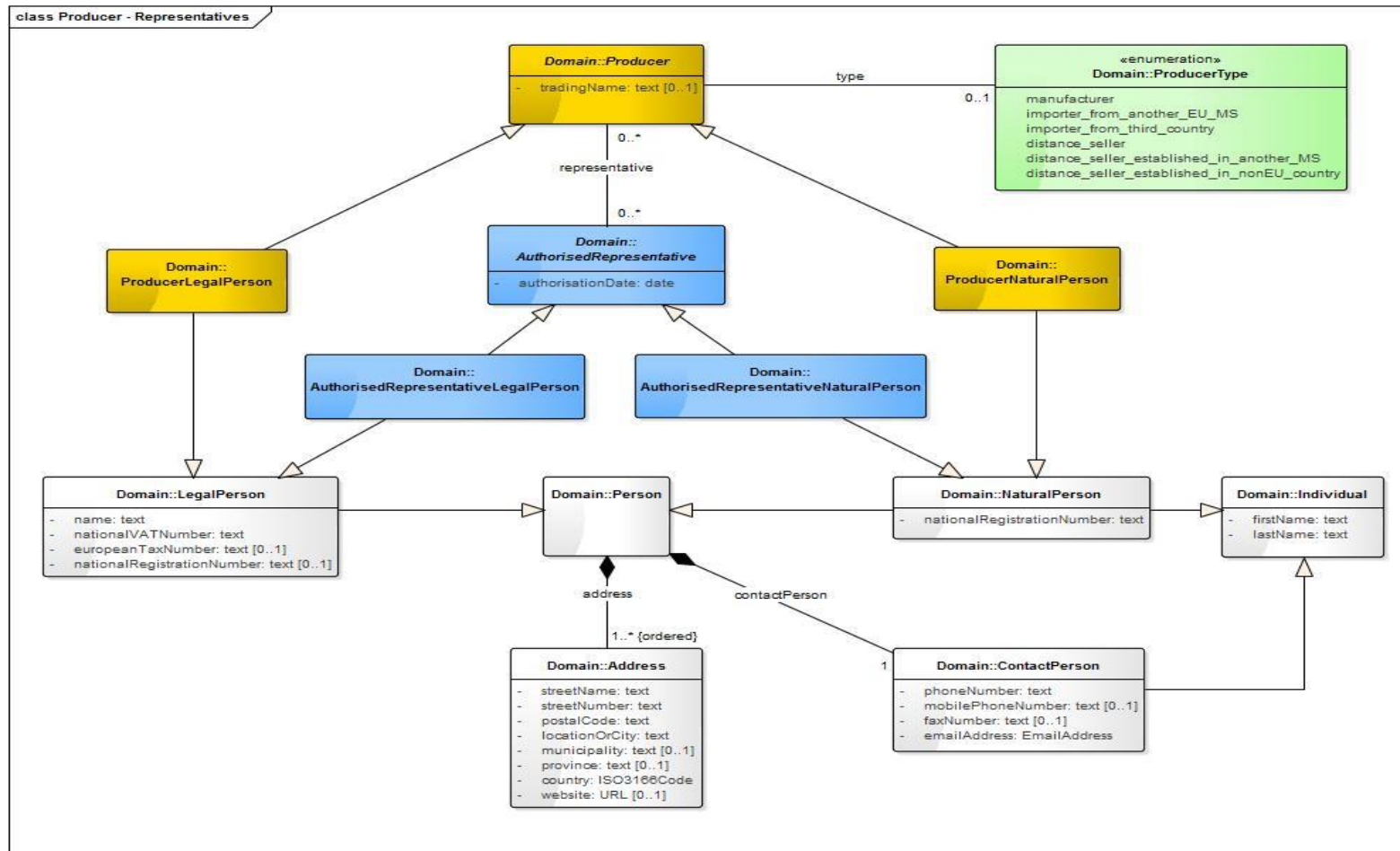


### 7.1.2. High-level object domain model for reporting

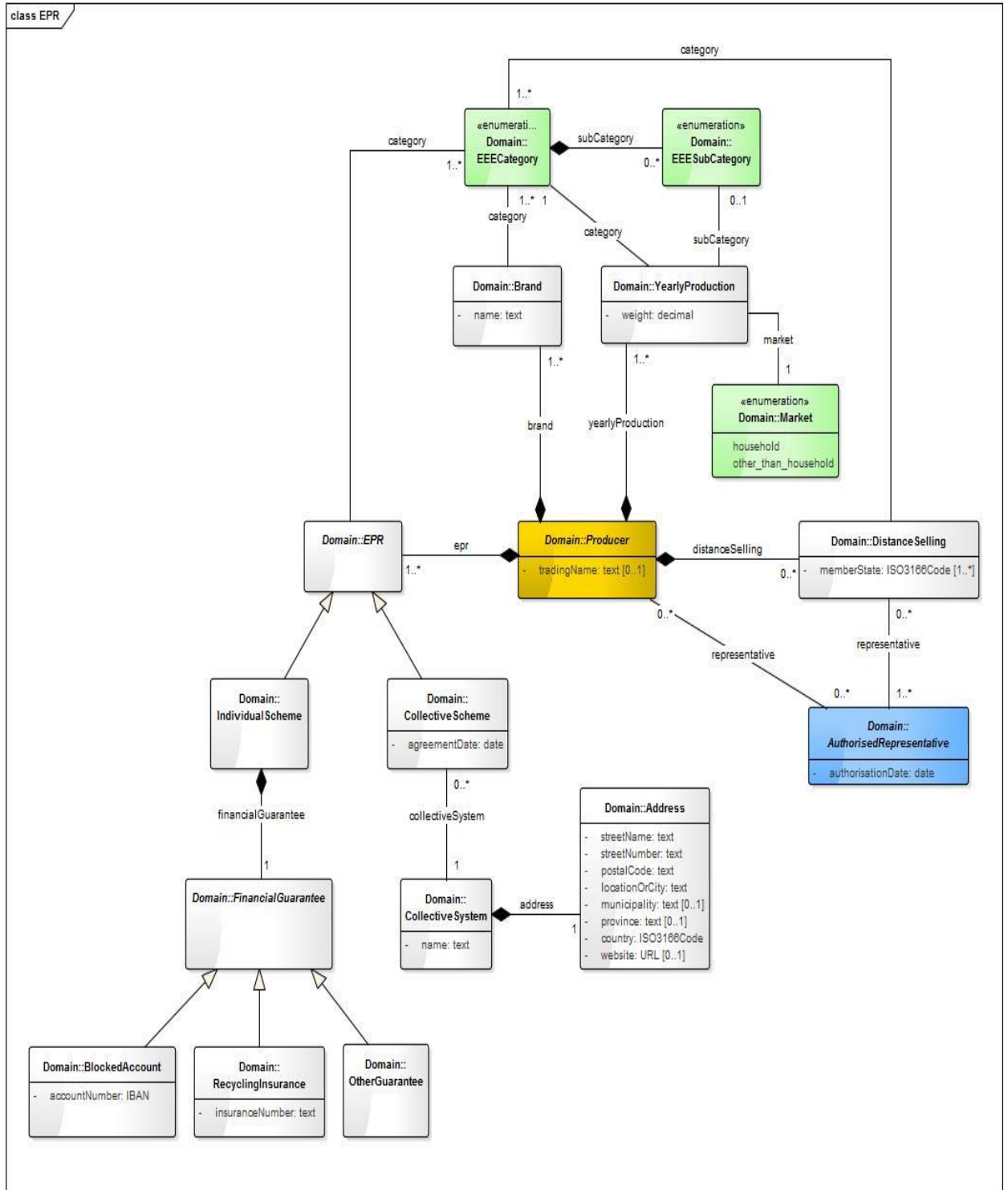
The domain model for **reporting** gives an overview of the relevant concepts, i.e. producer, authorised representative, yearly production, WEEE-related data, etc. involved in the business process of reporting.



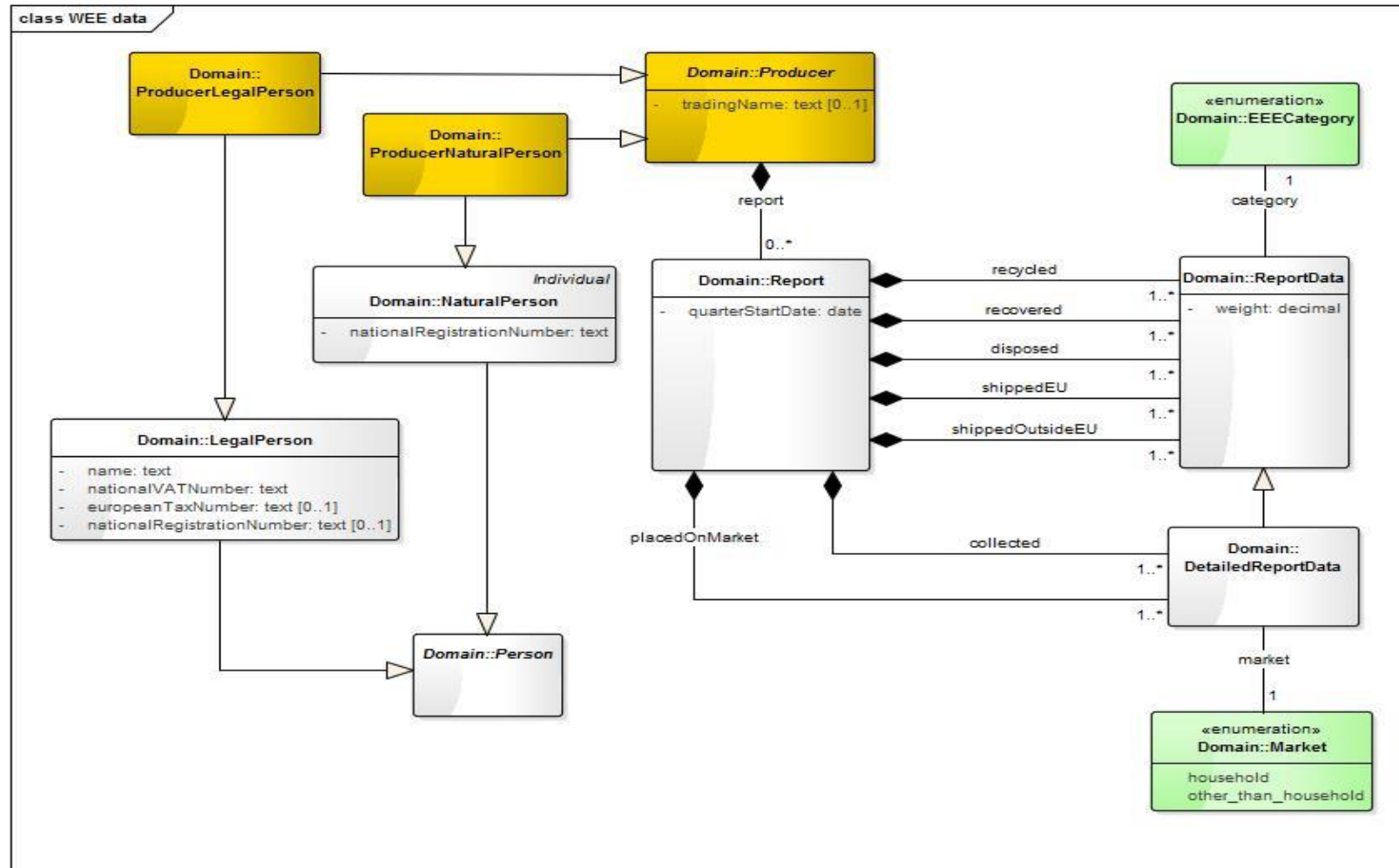
## 7.2. UML diagram: Producer-Authorised representative



### 7.3. UML diagram: Extended Producer responsibility



### 7.4. UML diagram: PoM & WEEE Report





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## 8 Presentation of XML Schema for registration and reporting

Having agreed on the data structure from a business perspective, i.e. on the model expressed in terms of the key business entities, their properties and their relations, the data model is used as direct input to the preparation of XML schemas.

An XML Schema describes the structure of an XML document, i.e. it describes how to construct the XML document in a formal way.<sup>57</sup> This means that XML schema for registration and reporting would be used for generation of required document for registration and reporting following defined harmonised structures.

This section contains the XML schema for registration and reporting (Section 8.1.2 and 8.1.3), including the XML Schema documents (.xsd files).

### 8.1. XML Schema for registration and reporting

The complete XML schema is represented below with a part of schema describing the data structure for generation of the registration document and a part of the schema for generation of the report. This presentation of registration and reporting-related parts of the schema are primarily for the purpose of better and more user-friendly visual presentation.

#### 8.1.1. XML Schema Document files

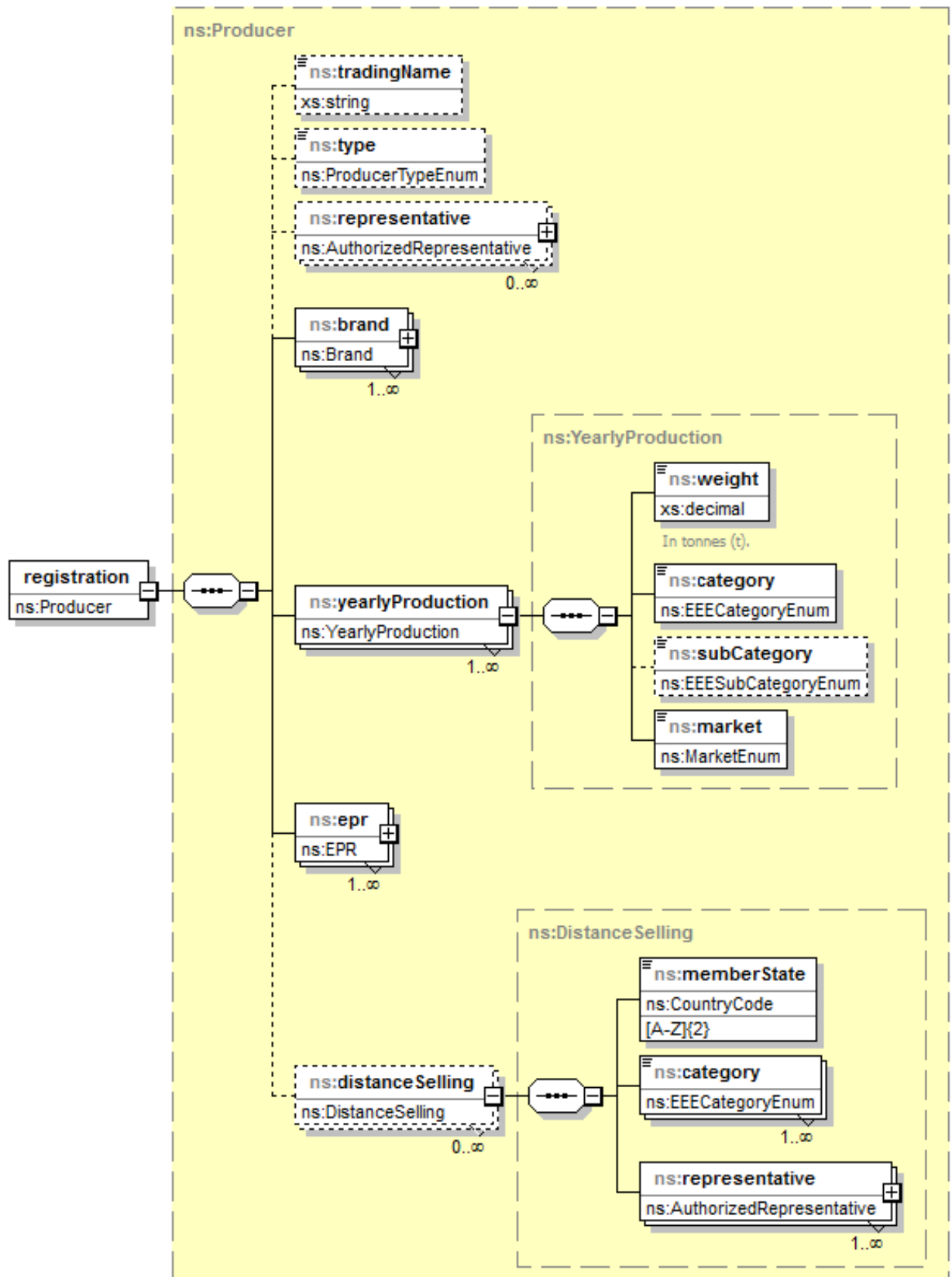
Herein below are attached the XML Schema Documents (XSD) for registration and reporting ('weee registration & reporting'), and XSD for categories ('weee categories').



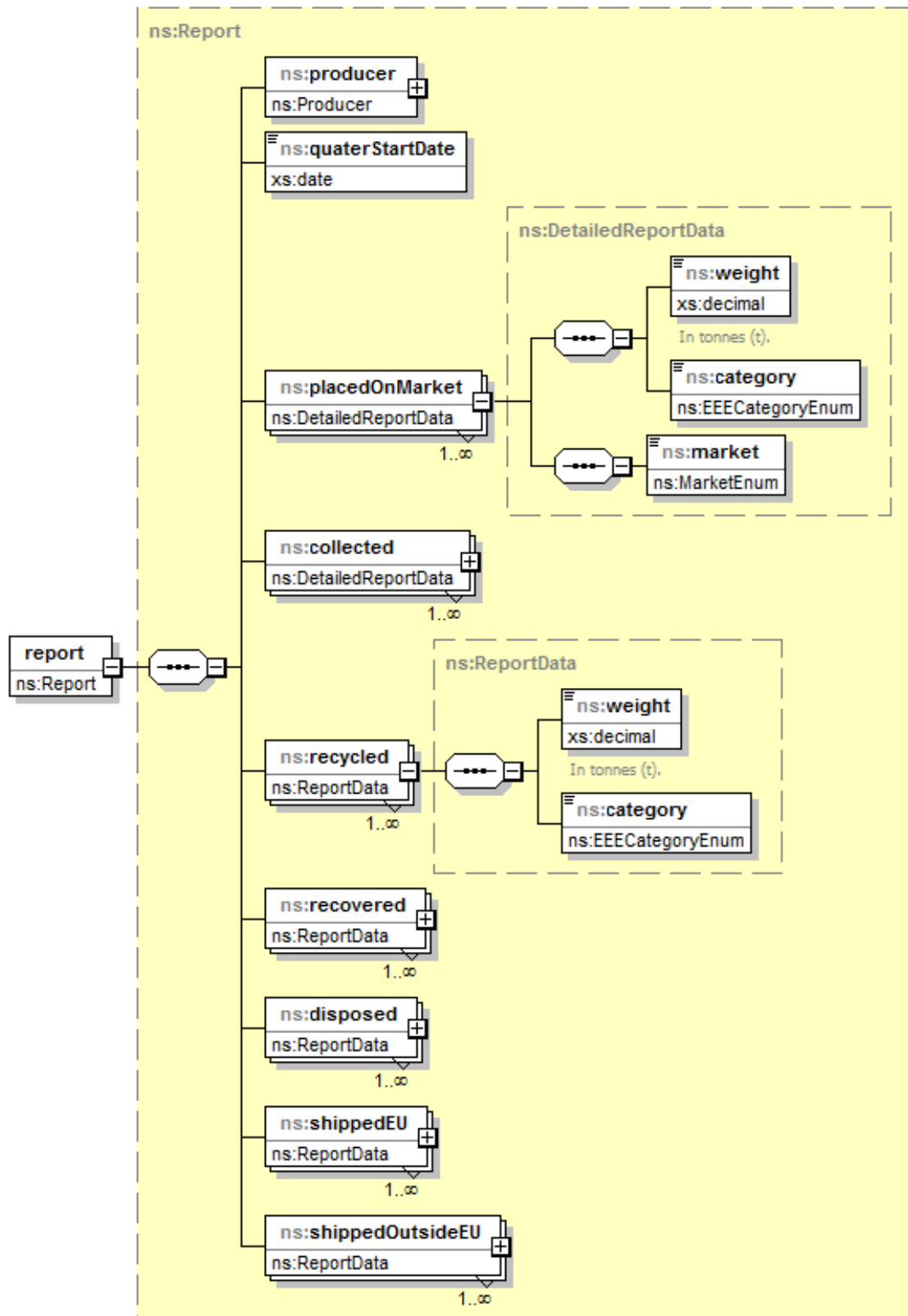
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<sup>57</sup> [http://www.w3schools.com/xml/schema\\_intro.asp](http://www.w3schools.com/xml/schema_intro.asp)

### 8.1.2. Registration



### 8.1.3. Reporting



## 9 Conclusions and recommendations

This chapter draws out the main conclusions from the analysis on each one of the different topics discussed and proposes recommendations in order to overcome specific drawbacks of the processes applied for registration and reporting.

- **Registration process.**

MS National practices for implementation of registration of EEE producers to the national register differs significantly<sup>58</sup>:

- 6 MS request from producers to register directly in the national register
- 11 MS ask the selected EPR compliance system to submit the registration on behalf of the producer.
- 11 MS give both possibilities to the producer to register in the national register, either directly or via selected EPR compliance system.
- Norway gathers registration data via automatic transfer of data from IT system of the customs and from EPR compliance system.

- **Reporting process.**

MS National practices for implementation of the reporting process of EEE producers to the National register differs significantly:

- 7 MS request producers to report directly to the national register
- 14 MS receive the producers report via the EPR compliance system with which the producer is contracted
- 7 MS gives the possibility to producers to report either directly to the national register or via the compliance scheme.
- Norway gathers reporting data via automatic transfer of data from IT system of the customs and from EPR compliance system.

- **Information structure and format.**

While the majority of MS have included the information as required per Annex X of the Directive, the study revealed that each of 28 MS introduced its own country-tailored registration and reporting template, with a range of specific fields. This means that for a producer operating at the EU level, it is necessary to prepare 28 MS-tailored reports. This creates red tape for the industry, in particular if a company is operating at the EU level and aims to streamline and automate the generation of required registration and reporting documents.

Thus, it is strongly recommended to introduce the proposed harmonised data structure and format for registration and reporting of EEE producers as a common denominator of dataset for all MS.

- **EEE categorisation system.**

Currently, the number of EEE categories and sub-categories included in the national MS legislations differs significantly:

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<sup>58</sup> In case a producer opted for EPR compliance system to meet its obligations.

- 27 MS transposed the 10 categories of EEE as defined in Annex I of the Directive. Exception is Austria which have established 6 categories and these are the following:
  - Large appliances
  - Refrigerators and freezers
  - Screen devices, including picture tube devices
  - Small electrical appliances
  - Gas discharge lamps
  - Photovoltaic module
- 4 MS (Czech Republic, Luxembourg, Portugal<sup>59</sup> and Romania<sup>60</sup>) transposed in fully Annex II list of equipment as sub-categories for obligatory reporting.
- 4 MS included a number of sub-categories for obligatory reporting
  - Germany (28 sub-categories)
  - Ireland (28 sub-categories)
  - Spain (14 sub-categories)

Existence of different EEE categorisations across the EU presents a red tape and burden for the industry, as they need to create MS-specific EEE categorisation systems instead of having an EU-wide agreed categorisation system in place.

In this context, it is recommended to develop an EU-wide EEE categorisation system and corresponding codification system with consideration of the UNU-Keys.<sup>61</sup> Furthermore, the use of the UNU-Keys would further improve the quality of the future estimations on the quantity of WEEE generated. Existence of one, harmonised EEE categorisation system would bring simplification for the industry as would 'replace' currently existing 28 different systems. Additionally, traceability, monitoring and reporting would be streamlined and harmonised.

- **Reporting period and frequency of reporting.**

The reporting period and frequency of reporting differs significantly among the MS, which present a burden for the industry, as the most of the companies/producers operate at the EU and global markets.

Alignment among the MS is strongly recommended with proposed quarterly reporting and deadline for submission of reports by 30th of the month following the respective quarter.

- **Data quality assurance.**

In essence, the reporting frequency introduced by a MS reflects on the needs of the MS authority and the overall reporting process.

In MS that request producers to report directly to the national register (Ireland, Portugal, Germany, Croatia) it is of utmost importance to have the data

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<sup>59</sup> Currently working on draft proposal to reduce the number of sub-categories.

<sup>60</sup> Idem

<sup>61</sup> Interesting to mention that the CWIT project in its Deliverable 6.1. Recommendations related to the EU Legal framework calls for an improved Waste codification system, which would connect the various classifications of WEEE and commodities. Additionally, it recommends development of compatibility tables to allow for converting customs codes into Basel Codes/Waste Shipment Regulation and vice-versa through the adoption of the UNU keys

reported on more frequent basis (monthly and quarterly) in order to ensure the quality of data submitted (as they carry out validation of the data directly with the producer) and financial stability of the system.

On the other side, in MS where reporting is carried out via the EPR compliance systems, the responsible MS authority have a need for receiving the reports on less frequent basis (usually annually) for main purpose of annual reporting to the European Commission.

This highlights the importance of clearly defining who is *responsible* for the quality of the data reported to the national register and also how the data validation and quality assurance is carried out in the MS.

## 10 Annex A- An overview of MS national legislation on registration and reporting of EEE producers and national registers

The EEE producers meet their registration and reporting obligations to the national register using different modalities.

This section presents a brief profile of 28 Member States and Norway with regard to the national WEEE legislation, information on responsible authorities/organisations for managing the national EEE register (if in place), how registration and reporting of EEE producer is carried out (format) and if the process is carried out using the national register.

### 10.1. Austria

**Table 10-26: Austria**

Title of national legislative acts	Ordinance of the Federal Minister of Agriculture and Forestry, Environment and Water Management on Waste Prevention, Collection and Treatment of Waste Electrical and Electronic Equipment (WEEE Ordinance), BGBl. (Federal Law Gazette) II No. 121/2005
Web link to original text:	<a href="https://www.ewrn.org/fileadmin/ewrn/content/documents/EAG-VO_i.d.F_2014.pdf">https://www.ewrn.org/fileadmin/ewrn/content/documents/EAG-VO_i.d.F_2014.pdf</a>
Web link to text in English	<a href="https://www.ewrn.org/fileadmin/ewrn/content/documents/weee_ordinance.pdf">https://www.ewrn.org/fileadmin/ewrn/content/documents/weee_ordinance.pdf</a>
Owner of the national register system	Ministry of Forestry, Land and Water management; Federal Environment Agency
Organisation responsible for managing the national register	Umweltbundesamt GmbH (UBA) (Federal Environmental Agency)
Name of the national register (if in place) and Web link	Electronic Data Management (EDM) <a href="http://edm.gv.at">http://edm.gv.at</a> ; (DE)
Specific link for registration and reporting (if applicable)	<a href="https://secure.umweltbundesamt.at/edm_portal/cms.do?get=/portal/informationen/anwendungenthemen/elektroaltgeraete.main">https://secure.umweltbundesamt.at/edm_portal/cms.do?get=/portal/informationen/anwendungenthemen/elektroaltgeraete.main</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template

## 10.2. Belgium

**Table 10-27: Belgium**

Title of regional legislations	<p><u>Flanders region:</u> Besluit van de Vlaamse Regering tot vaststelling van het Vlaams reglement betreffende het duurzaam beheer van materiaalkringlopen en afvalstoffen (VLAREMA) from 17 February 2012.</p> <p><u>Wallonia region:</u><sup>62</sup> Convention environnementale concernant l'obligation de reprise des déchets d'équipements électriques et électroniques.</p> <p><u>Brussels region:</u><sup>63</sup> Besluit van de Brusselse Hoofdstedelijke Regering tot wijziging van het besluit van de Brusselse Hoofdstedelijke Regering van 18 juli 2002 tot invoering van een terugnameplicht voor sommige afvalstoffen met het oog op hun nuttige toepassing of hun verwijdering.</p>
Web links to original text	<p>Flanders:  <a href="http://navigator.emis.vito.be/milnavconsult/consultatieLink?wettekstId=12765&amp;appLang=en&amp;wettekstLang=en">http://navigator.emis.vito.be/milnavconsult/consultatieLink?wettekstId=12765&amp;appLang=en&amp;wettekstLang=en</a></p>
Web link to text in English	Not available
Owner of the national register system	Recupel compliance system maintains the list of the EEE producers. A separate registration and reporting IT tool for Flanders region is currently under development.
Organisation responsible for managing the national register	Recupel compliance system
Name of the national register and Web link	<a href="http://www.recupel.be/homepage.html">http://www.recupel.be/homepage.html</a> (EN, NL, FR, DE)
Specific link for registration and reporting (if applicable)	<a href="https://portal.recupel.be/portal/page?_pageid=1558,14302426&amp;_dad=portal&amp;_schema=PORTAL">https://portal.recupel.be/portal/page?_pageid=1558,14302426&amp;_dad=portal&amp;_schema=PORTAL</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template

<sup>62</sup> Recupel web site <http://www.recupel.be/legislation-authorities.html>

<sup>63</sup> Idem



### 10.3. Bulgaria

**Table 10-28: Bulgaria**

Title of national legislative acts	Ordinance on Waste Electrical and Electronic Equipment, CM Decree № 256 from 11.13.2013, the prom. SG. 100 of 11.19.2013, effective from 1.01.2014.
Web link to original text:	<a href="http://www.moew.government.bg/files/file/Waste/Legislation/Naredbi/waste/NAREDBA_za_izlqzлото_ot_upotreba_elektrichsko_i_elektronno_oborudvane.rtf">http://www.moew.government.bg/files/file/Waste/Legislation/Naredbi/waste/NAREDBA_za_izlqzлото_ot_upotreba_elektrichsko_i_elektronno_oborudvane.rtf</a>
Web link to text in English	Not available
Owner of the national register system	Executive Environment Agency (EEA)
Organisation responsible for managing the national register	Executive Environment Agency
Name of the register and Web link	<a href="http://www.eea.government.bg/">http://www.eea.government.bg/</a> (BG; EN)
Specific link for registration and reporting (if applicable)	Registration (BG): <a href="http://eea.government.bg/mro/Registers/REG_request_EEA.aspx">http://eea.government.bg/mro/Registers/REG_request_EEA.aspx</a>
Registration of EEE producer done via national registry:	Yes Online web template
Reporting of EEE producers done via national registry	No Carried out via Excel sheet submitted to the EEA email address or send via postal mail.

## 10.4. Croatia

**Table 10-29: Croatia**

Title of national legislative acts	Act on Sustainable Waste Management (OG 94/13) Ordinance on the management of waste electrical and electronic equipment (OG 42/14, OG 48/14, OG 107/14, 139/14)
Web link to original text:	<a href="http://narodne-novine.nn.hr/clanci/sluzbeni/2014_04_42_782.html">http://narodne-novine.nn.hr/clanci/sluzbeni/2014_04_42_782.html</a>
Web link to text in English	Yes, partially <a href="http://www.mzoeip.hr/en/waste/regulations-and-international-treaties.html">http://www.mzoeip.hr/en/waste/regulations-and-international-treaties.html</a>
Owner of the national register system	The Environmental Protection and Energy Efficiency Fund
Organisation responsible for managing the national register	The Environmental Protection and Energy Efficiency Fund
Name of the national register and Web link	<a href="http://www.fzoeu.hr/hrv/index.asp">http://www.fzoeu.hr/hrv/index.asp</a> (HR; EN) <b>Note:</b> <i>Establishment of the national register is in process.</i> <i>In accordance with the Ordinance (2014) it is planned to adopt a special legislative act for establishment of the Register. However, this is still in process. Thus, the EEE producers are obliged to submit reports (first report is regarded as registration as well) to the existing database of the Fund, which serves as a register system.</i>
Specific link for registration and reporting (if applicable)	Not applicable
Registration of EEE producer done via national registry	No Until the Register is set up in accordance with the Ordinance (2014), EEEE producers are obliged to submit to the Fund a monthly IU/PEEO Report. The format is available on the Fund's website in Excel format, which has to be filled in, validated and sent by e-mail to <a href="mailto:naknade@fzoeu.hr">naknade@fzoeu.hr</a> or by post. Currently, first report submitted is regarded also as registration of the producer.
Reporting of EEE producers done via national registry	No Excel format, which has to be filled in, validated and sent by e-mail to <a href="mailto:naknade@fzoeu.hr">naknade@fzoeu.hr</a> or by post.

## 10.5. Cyprus

**Table 10-30: Cyprus**

Title of national legislative acts	The Waste (Waste of Electrical and Electronic Equipment) Regulations of 2015 (K.D.P 73/2015)
Web link to original text:	<a href="http://www.moa.gov.cy/moa/environment/environment.nsf/All/1CC90722C0CFE632C2257E0700472FA6/\$file/KDP73-2015.pdf">http://www.moa.gov.cy/moa/environment/environment.nsf/All/1CC90722C0CFE632C2257E0700472FA6/\$file/KDP73-2015.pdf</a>
Web link to text in English	Not available
Owner of the national register system	Department of Environment, Ministry of Agriculture, Rural Development and Environment
Organisation responsible for managing the national register	WEEE Electrocyclusis Ltd. – compliance system
Name of the national register and Web link	<a href="http://www.electrocyclusis.com.cy/en/index.php">http://www.electrocyclusis.com.cy/en/index.php</a> (GR; EN)
Specific link for registration and reporting (if applicable)	Currently, WEEE Declarations <a href="http://www.electrocyclusis.com.cy/en/calc-form.php">http://www.electrocyclusis.com.cy/en/calc-form.php</a>
Registration of EEE producer done via national register	Yes Online web templates for members of the EPR compliance system. <i>Note: New web templates for registration in accordance with the Regulation 21 from 2015 is planned to be developed in near future.</i>
Reporting of EEE producers done via national register	Yes Online web templates for members of the EPR compliance system. Excel document for individual system of EEE producers <i>Note: New web templates for registration in accordance with the Regulation 21 from 2015 is planned to be developed in near future.</i>

## 10.6. Czech Republic

**Table 10-31: Czech Republic**

Title of national legislative acts	Decree No. 352/2005 Coll., on details of management of electrical and electronic equipment and the detailed conditions of financing handling with them (Decree on the management of electrical and electronic equipment).
Web link to original text:	<a href="http://www.mzp.cz/C1257458002F0DC7/cz/nakladani_s_elektrozarizeni_elektroodpadem_legislativa/\$FILE/OODP-vyhlaska_352_2005_Sb-20141105.pdf">http://www.mzp.cz/C1257458002F0DC7/cz/nakladani_s_elektrozarizeni_elektroodpadem_legislativa/\$FILE/OODP-vyhlaska_352_2005_Sb-20141105.pdf</a>
Web link to text in English	<a href="http://www.mzp.cz/C125750E003B698B/en/wee_legislation/\$FILE/OODP-Decree_352_2005_EN-20120123.pdf">http://www.mzp.cz/C125750E003B698B/en/wee_legislation/\$FILE/OODP-Decree_352_2005_EN-20120123.pdf</a>
Owner of the national register	The Ministry of the Environment, Water Management Department, Take Back Unit
Organisation responsible for managing the national register	The Ministry of the Environment, Water Management Department, Take Back Unit
Name of the national register and Web link	<a href="http://www.mzp.cz/en/waste_eee">http://www.mzp.cz/en/waste_eee</a> (EN; CZ)
Specific link for registration and reporting (if applicable)	<a href="http://isoh.mzp.cz/webelektro">http://isoh.mzp.cz/webelektro</a> (CZ)
Registration of EEE producer done via national register	Yes Online or filling in pdf. and sending by mail
Reporting of EEE producers done via national register	Yes (uploading in the Ministry Information System Performance Reporting-ISPOP) XML format

## 10.7. Denmark

**Table 10-32: Denmark**

Title of national legislative acts	Environmental Protection Act, Consolidation Act no. 879 of June 26, 2010.  Statutory Order no. 130 of February 6 2014, on placing on the market of electrical and electronic equipment and management of waste electrical and electronic equipment
Web link to original text:	<a href="https://www.dpa-system.dk/da/DPA/Dokumenter?id=833f8c77-379f-4cf3-ab0c-d21aec74142b">https://www.dpa-system.dk/da/DPA/Dokumenter?id=833f8c77-379f-4cf3-ab0c-d21aec74142b</a>
Web link to text in English	<a href="http://eng.mst.dk/media/mst/8917328/Engelsk%20oversaettelse%20af%20elektronikaffaldsbekendtgorelsen_FINAL.pdf">http://eng.mst.dk/media/mst/8917328/Engelsk%20oversaettelse%20af%20elektronikaffaldsbekendtgorelsen_FINAL.pdf</a>
Owner of the national register	Ministry of Environment
Organisation responsible for managing the national register	Danish Producer Responsibility System (DPA-system) <i>Note: DPA-System is an independent non-profit organization established in pursuance of the Danish Environmental Protection Act with the purpose of administering the rules on producer responsibility for the product groups: electrical and electronic equipment, batteries and accumulators, and end-of-life vehicles.</i>
Name of the national register and Web link	<a href="https://www.dpa-system.dk/da/DPA">https://www.dpa-system.dk/da/DPA</a> (EN; DK)
Specific link for registration and reporting (if applicable)	<a href="https://www.dpa-system.dk/da/WEEE">https://www.dpa-system.dk/da/WEEE</a> (EN; DK)
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template, XML and CSV file

## 10.8. Estonia

**Table 10-33: Estonia**

Title of national legislative acts	Waste Act
Web link to original text:	<a href="https://www.riigiteataja.ee/akt/108072014017">https://www.riigiteataja.ee/akt/108072014017</a>
Web link to text in English	<a href="https://www.riigiteataja.ee/en/eli/ee/Riigikogu/act/520012015021/consolide">https://www.riigiteataja.ee/en/eli/ee/Riigikogu/act/520012015021/consolide</a>
Owner of the national register	Ministry of Environment
Organisation responsible for managing the national register	Estonian Environment Agency
Name of the national register and Web link	PROTO Register <a href="http://proto.keskkonnainfo.ee/?page=pub_startup_eng&amp;lang=eng&amp;u=20150228174516">http://proto.keskkonnainfo.ee/?page=pub_startup_eng&amp;lang=eng&amp;u=20150228174516</a> (EE; EN-partially)
Specific link for registration and reporting (if applicable/available)	Not available
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template or Excel document sending to the authority's email (CSV format)

## 10.9. Finland

**Table 10-34: Finland**

Title of national legislative acts	Waste Act 646/2011 Government decree on WEEE 519/2014
Web link to original text:	Not provided
Web link to text in English	<a href="http://www.finlex.fi/en/laki/kaannokset/2011/en20110646.pdf">http://www.finlex.fi/en/laki/kaannokset/2011/en20110646.pdf</a> <i>Note: does not include the amendment from 2014</i>
Owner of the national register	Centre for Economic Development, Transport and the Environment for Pirkanmaa
Organisation responsible for managing the national register	Centre for Economic Development, Transport and the Environment for Pirkanmaa
Name of the national register and Web link	<a href="https://www.ely-keskus.fi/en/web/ely-en/frontpage">https://www.ely-keskus.fi/en/web/ely-en/frontpage</a> (FI; SE; EN; RU)
Specific link for registration and reporting (if applicable/available)	Producer application for registration (Finish only)  <a href="http://www.ymparisto.fi/download/noname/%7BCD6136D2-7CA5-4DF8-BC27-E10A71AF1C0E%7D/74916">http://www.ymparisto.fi/download/noname/%7BCD6136D2-7CA5-4DF8-BC27-E10A71AF1C0E%7D/74916</a> Producer of the Community application, Producer register (Finish only)  <a href="http://www.ymparisto.fi/download/noname/%7B87A8029C-1190-4C19-884F-F7575B62B3D5%7D/74910">http://www.ymparisto.fi/download/noname/%7B87A8029C-1190-4C19-884F-F7575B62B3D5%7D/74910</a>
Registration of EEE producer done via registry:	Yes Online web format or Registration template in pdf. to be send to the authority's email or by post.
Reporting of EEE producers done via registry	Yes Online web template or Reporting template in pdf. to be send to the authority's email or by post.

## 10.10. France

**Table 10-35: France**

Title of national legislative acts	<p>- Décret n° 2014-928 du 19 août 2014 relatif aux déchets d'équipements électriques et électroniques et aux équipements électriques et électroniques usagés (article R. 543-172 et suivants du code de l'environnement)</p> <p>- Arrêté du 30 juin 2009 modifié relatif à la procédure d'enregistrement et de déclaration au registre national pour les équipements électriques et électroniques prévu à l'article R. 543-202 du code de l'environnement, et abrogeant l'arrêté du 13 mars 2006 relatif à la procédure d'inscription et aux informations figurant au registre national des producteurs prévu à l'article 23 du décret n° 2005-829 du 20 juillet 2005 relatif à la composition des équipements électriques et électroniques et à l'élimination des déchets issus de ces équipements (NOR: DEVP0911347A)</p> <p>- Arrêté du 23 novembre 2005 modifié relatif aux modalités de traitement des déchets d'équipements électriques et électroniques prévues à l'article 21 du décret n° 2005-829 du 20 juillet 2005 relatif à la composition des équipements électriques et électroniques et à l'élimination des déchets issus de ces équipements (NOR: DEVP0540446A)</p>
Web link to original text:	Not provided
Web link to text in English	Not available
Owner of the national register	French Environment and Energy Management Agency (Agence de l'Environnement et de la Maîtrise de l'Energie (ADEME));
Organisation responsible for managing the national register	French Environment and Energy Management Agency (Agence de l'Environnement et de la Maîtrise de l'Energie (ADEME)
Name of the national register and Web link	SYDEREP register <a href="https://www.syderep.ademe.fr/en">https://www.syderep.ademe.fr/en</a> (FR; EN)
Specific link for registration and reporting (if applicable/available)	<a href="https://www.syderep.ademe.fr/en/commun/deee;">https://www.syderep.ademe.fr/en/commun/deee;</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template



## 10.11. Germany

**Table 10-36: Germany**

Title of national legislative acts	<p>Gesetz über das Inverkehrbringen, die Rücknahme und die umweltverträgliche Entsorgung von Elektro- und Elektronikgeräten (Elektro- und Elektronikgerätegesetz - ElektroG)</p> <p>Act Governing the Sale, Return and Environmentally Sound Disposal of Electrical and Electronic Equipment, (Electrical and Electronic Equipment Act, or ElektroG) 1 of 16. March 2005</p>
Web link to original text:	<a href="http://www.gesetze-im-internet.de/bundesrecht/elektrog/gesamt.pdf">http://www.gesetze-im-internet.de/bundesrecht/elektrog/gesamt.pdf</a>
Web link to text in English	<a href="http://www.bmub.bund.de/fileadmin/bmu-import/files/pdfs/allgemein/application/pdf/elektrog_uk.pdf">http://www.bmub.bund.de/fileadmin/bmu-import/files/pdfs/allgemein/application/pdf/elektrog_uk.pdf</a>
Owner of the national register	German Environmental Protection Agency Umweltbundesamt (Umweltbundesamt (EPA))
Organisation responsible for managing the national register	<p>Stiftung elektro-altgeräte register (Stiftung ear)</p> <p><i>Note: Stiftung ear is a private foundation. It's the national producer register, the clearing house. The EPA transferred public rights and obligations onto Stiftung ear, and thus can act as authority (supervised by the EPA).</i></p>
Name of the national register and Web link	<p>Stiftung elektro-altgeräte register (DE; EN)</p> <p><a href="http://www.stiftung-ear.de/index_eng.html">http://www.stiftung-ear.de/index_eng.html</a></p>
Specific link for registration and reporting (if applicable/available)	<a href="https://www.stiftung-ear.de/en/system-access/">https://www.stiftung-ear.de/en/system-access/</a>
Registration of EEE producer done via national register	<p>Yes</p> <p>Online web template or</p> <p>Submission in written form by exception (in case no internet access)</p>
Reporting of EEE producers done via national register	<p>Yes</p> <p>Online web template</p>

## 10.12. Greece

**Table 10-37: Greece**

Title of national legislative acts	Joint Ministerial Decision (JMD) 23615/651/E.103/2014 Setting of rules, terms and conditions for the alternative management of waste electrical and electronic equipment, in conformity with the provisions of the Directive 2012/19/EU "on electrical and electronic equipment" of the European Parliament and Council of the 4th July 2012 and other provisions (FEK B 1184/B/2014)
Web link to original text:	<a href="http://www.elinyae.gr/el/item_details.jsp?cat_id=2822&amp;item_id=10228">http://www.elinyae.gr/el/item_details.jsp?cat_id=2822&amp;item_id=10228</a>
Web link to text in English (if available)	Not available
Owner of the national register	Hellenic Recycling Agency (HRA)
Organisation responsible for managing the national register	Hellenic Recycling Agency (HRA)
Name of the national register and Web link	<a href="http://www.eoan.gr/el/">http://www.eoan.gr/el/</a> (GR) <i>Note: A register is established and currently EEE producers can register only through one of the two established compliance schemas in Greece. The new registry, that will fully comply with the provisions of Directive 2012/19/EU (categories of equipment, legal representative etc.) is expected to be established though a new legislative act (possibly a Ministerial Decision) within 2015 and be accessible to producers through the Hellenic Recycling Agency's (HRA) website (www.eoan.gr)</i>
Specific link for registration and reporting	Not applicable
Registration of EEE producer done via national register	No EEE producers have to print out a MS word template from the web site of the Hellenic Recycling Agency, fill it in, sign and stamp and send to their compliance schema, with whom they already have a contract in place. Establishing a cooperation agreement with one of the collective schemas is a pre-requisite for registration. The schema will submit the registration application to the HRA and afterwards receive National Registration Number for that specific producer. The new registry is expected to include an on-line web form.
Reporting of EEE producers done via national register	Yes Online web templates

## 10.13. Hungary

**Table 10-38: Hungary**

Title of national legislative acts	Government Decree no. 197/2014 (VIII. 1.) on waste management activities with electrical and electronic equipment's.
Web link to original text:	<a href="http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A1400197.KOR">http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A1400197.KOR</a>
Web link to text in English (if available)	Not available
Owner of the national register	National Inspectorate for Environment and Nature
Organisation responsible for managing the national register	National Inspectorate for Environment and Nature
Name of the national register and Web link	E-government platform called "Ügyfélkapu" <a href="http://web.okir.hu/en/">http://web.okir.hu/en/</a> (HU; EN- partially) Conditions for Electronic Data Submission (HU only) <a href="http://web.okir.hu/hu/cikk/279/Az_elektronikus_adatszolgáltatás_benyújtásának_feltetelei">http://web.okir.hu/hu/cikk/279/Az_elektronikus_adatszolgáltatás_benyújtásának_feltetelei</a>
Specific link for registration and reporting (if applicable)	Yes (HU only) Producer or authorised representative registration (sign-up) <a href="http://ugyfelkapu.magyarorszag.hu">http://ugyfelkapu.magyarorszag.hu</a> Registration process <a href="http://web.okir.hu/hu/urlapok">http://web.okir.hu/hu/urlapok</a> <i>Note: The process is carried in a three-step approach: first- sign up (registration of the producer or authorised representative); second-activation and third- entry of data.</i>
Registration of EEE producer done via national register	Yes (HU only); XML format <i>Note: This new WEEE registration process has been made as a part of the OKIR (Országos Környezetvédelmi Információs Rendszer – National Environmental Information System). OKIR is targeted to reach the requirements of INSPIRE-EU. The entire Hungarian waste data service is made through OKIR.</i>
Reporting of EEE producers done via national register	Yes (HU only) XML format / ( "HEE – főlap" form has to be used)

## 10.14. Ireland

**Table 10-39: Ireland**

Title of national legislative acts	European Union (Waste Electrical and Electronic Equipment) Regulations 2014; S.I. No. 149 of 2014
Web link to original text:	<a href="http://www.irishstatutebook.ie/pdf/2014/en.si.2014.0149.pdf">http://www.irishstatutebook.ie/pdf/2014/en.si.2014.0149.pdf</a>
Web link to text in English (if available)	Yes <a href="http://www.irishstatutebook.ie/pdf/2014/en.si.2014.0149.pdf">http://www.irishstatutebook.ie/pdf/2014/en.si.2014.0149.pdf</a>
Owner of the national register	National Registration body- WEEE Register Society Ltd.
Organisation responsible for managing the national register	WEEE Register Society Ltd.
Name of the national register and web link	<a href="http://www.weeeregister.ie/registration/y2015">http://www.weeeregister.ie/registration/y2015</a>
Specific link for registration and reporting (if applicable)	Registration <a href="http://www.weeeregister.ie/registration/y2015">http://www.weeeregister.ie/registration/y2015</a> Reporting <a href="http://www.weeeblackbox.ie">www.weeeblackbox.ie</a>
Registration of EEE producer done via national register	Yes Online web template or Postal application (form to download and fill it in) <a href="http://www.weeeregister.ie/uploads/content/2015-Application.pdf">http://www.weeeregister.ie/uploads/content/2015-Application.pdf</a>
Reporting of EEE producers done via registry	Yes Online web template <a href="http://www.weeeblackbox.ie">www.weeeblackbox.ie</a>

## 10.15. Italy

**Table 10-40: Italy**

Title of national legislative acts	Legislative Decree March 14th 2014 n. 49. Implementing Directive 2012/19/UE on Waste Electric and Electronic Equipment (WEEE).
Web link to original text:	<a href="http://www.governo.it/backoffice/allegati/75158-9343.pdf">http://www.governo.it/backoffice/allegati/75158-9343.pdf</a>
Web link to text in English (if available)	Not available
Owner of the national register	Committee for Supervision and Control on WEEE Management, Chamber of Commerce, ISPRA.
Organisation responsible for managing the national register	Committee for Supervision and Control on WEEE Management, Chamber of Commerce, ISPRA.
Name of the national register and Web link	National Register of EEE producers <a href="http://www.registroaee.it">www.registroaee.it</a> (EN; IT)
Specific link for registration and reporting (if applicable)	Registered producers <a href="http://www.registroaee.it/en/RicercaProduttori">http://www.registroaee.it/en/RicercaProduttori</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template

## 10.16. Latvia

**Table 10-41: Latvia**

Title of national legislative acts	-Law on Waste Management - Cabinet Regulations of 17 June 2014 No.331 "Procedure for Registration of Electrical and Electronic Equipment and Batteries or Accumulators Producers and Payment for Data Maintenance" - Cabinet Regulations of 8 July 2014 No.388 "Electrical and Electronic Equipment Categories, and Marking Requirements, and regulations of WEEE management"
Web link to original text:	Law on Waste Management; <a href="http://likumi.lv/doc.php?id=265382">http://likumi.lv/doc.php?id=265382</a> Cabinet regulation No. 331; <a href="http://likumi.lv/doc.php?id=267141">http://likumi.lv/doc.php?id=267141</a> Cabinet regulation No. 388 ; <a href="http://likumi.lv/doc.php?id=267716">http://likumi.lv/doc.php?id=267716</a>
Web link to text in English (if available)	Yes, only Law on Waste Management <a href="http://www.vvc.gov.lv/advantagecms/LV/tulkojumi/meklet_dokumentus.html?query=Waste+Management+Law&amp;Submit=Mekl%C4%93t&amp;resultsPerPage=10">http://www.vvc.gov.lv/advantagecms/LV/tulkojumi/meklet_dokumentus.html?query=Waste+Management+Law&amp;Submit=Mekl%C4%93t&amp;resultsPerPage=10</a>
Owner of the national register	Ministry of Environmental Protection and Regional Development.
Organisation responsible for managing the national register	Latvian Electrical Engineering and Electronics Industry Association.
Name of the national register and Web link	<a href="http://www.elektroregistrs.lv/">http://www.elektroregistrs.lv/</a> (EN; LV)
Specific link for registration and reporting (if applicable)	Registration <a href="http://www.elektroregistrs.lv/registration/en">http://www.elektroregistrs.lv/registration/en</a> Reporting <a href="https://www.lursoft.lv/lapsaext?act=EEIRI_MAIN">https://www.lursoft.lv/lapsaext?act=EEIRI_MAIN</a>
Registration of EEE producer done via national register	Yes Online web template or Filling in pdf. document to be send by post
Reporting of EEE producers done via national register	Yes Online web template or Filling in pdf. document to be send by post

## 10.17. Lithuania

**Table 10-42: Lithuania**

Title of national legislative acts	Electrical and electronic equipment and its waste management rules
Web link to original text:	<a href="http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=241701&amp;p_query=&amp;p_tr2=">http://www3.lrs.lt/pls/inter3/dokpaieska.showdoc_l?p_id=241701&amp;p_query=&amp;p_tr2=</a>
Web link to text in English (if available)	Not available
Owner of the national register	Lithuanian Environmental Protection Agency (LEPA)
Organisation responsible for managing the national register	Lithuanian Environmental Protection Agency (LEPA)
Name of the national register and Web link	<a href="http://gamta.lt/cms/index?lang=lt">http://gamta.lt/cms/index?lang=lt</a> (LT; EN-partially)
Specific link for registration and reporting (if applicable)	<a href="http://gamta.lt/cms/index?lang=lt">http://gamta.lt/cms/index?lang=lt</a>
Registration of EEE producer done via national register	Yes Online web template or Filled in pdf. document to be send to the authority's email address or by post
Reporting of EEE producers done via national register	Yes Online web template or Filled in pdf. document to be send to the authority's email address or by post

## 10.18. Luxembourg

**Table 10-43: Luxembourg**

Title of national legislative acts	"Grand-ducal regulation on 30th July 2013 on WEEE"
Web link to original text:	<a href="http://www.legilux.public.lu/leg/a/archives/2013/0145/a145.pdf#page=2">http://www.legilux.public.lu/leg/a/archives/2013/0145/a145.pdf#page=2</a>
Web link to text in English (if available)	Not available
Owner of the national register	Environment protection Agency Luxembourg
Organisation responsible for managing the national register	Environment protection Agency Luxembourg
Name of the national register and Web link	<a href="http://www.environnement.public.lu/index.html">http://www.environnement.public.lu/index.html</a>
Specific link for registration and reporting (if applicable)	Registration <a href="http://www.environnement.public.lu/guichet_virtuel/GV_dechets/enreg_deee/index.html">http://www.environnement.public.lu/guichet_virtuel/GV_dechets/enreg_deee/index.html</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	No Filling in Excel document and sending to the authority's email or by post.



## 10.19. Malta

**Table 10-44: Malta**

Title of national legislative acts	Subsidiary Legislation 504.75 – the Waste Management (Electrical and Electronic Equipment) Regulations
Web link to original text:	
Web link to text in English (if available)	<a href="http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&amp;itemid=11552&amp;l=1">http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&amp;itemid=11552&amp;l=1</a>
Owner of the national register	The Malta Environment and Planning Authority (MEPA)
Organisation responsible for managing the national register	The Malta Environment and Planning Authority (MEPA)
Name of the national register and Web link	<a href="http://www.mepa.org.mt/home">http://www.mepa.org.mt/home</a> (EN)
Specific link for registration and reporting (if applicable)	<a href="http://www.mepa.org.mt/waste-weee">http://www.mepa.org.mt/waste-weee</a>
Registration of EEE producer done via national register	Yes Online web template or Registration form is available as a PDF document, which would need to be filled in and delivered to the Front Desk at MEPA, St. Francis Ravelin, Floriana, accompanied by proof of payment.
Reporting of EEE producers done via national register	Yes Online web template or Reporting form is available as a PDF document, which would need to be filled in and delivered to the Front Desk at MEPA.


## 10.20. Netherlands

**Table 10-45: Netherlands**

Title of national legislative acts	Regulation of the State Secretary of Infrastructure and the Environment, of 3 February 2014, no IENM/BSK-2014/14758, establishing rules on waste electrical and electronic equipment (Regulation on waste electrical and electronic equipment)
Web link to original text:	<a href="http://wetten.overheid.nl/BWBR0034782/geldigheidsdatum_24-04-2015">http://wetten.overheid.nl/BWBR0034782/geldigheidsdatum_24-04-2015</a>
Web link to text in English (if available)	<a href="http://www.eera-recyclers.com/news/new-milestones-world-regulation-weee">http://www.eera-recyclers.com/news/new-milestones-world-regulation-weee</a>
Owner of the national register	The National (W)EEE Register (funded by the producers) as delegated by the Dutch Government
Organisation responsible for managing the national register	The National (W)EEE Register (funded by the producers) as delegated by the Dutch Government
Name of the national register and Web link	National WEEE Register <a href="http://www.nationaalweeeregister.nl/english(EN; NL)">http://www.nationaalweeeregister.nl/english(EN; NL)</a>
Specific link for registration and reporting (if applicable)	Registration (EN; NL) <a href="http://nationaalweeeregister-applicatie.nl/Aanmeld.aspx">http://nationaalweeeregister-applicatie.nl/Aanmeld.aspx</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template

## 10.21. Poland

**Table 10-46: Poland**

Title of national legislative acts	USTAWA Z DNIA 29 LIPCA 2005 R. O ZUŻYTYM SPRZĘCIE ELEKTRYCZNYM I ELEKTRONICZNYM (Dz. U. z 2013 r. poz. 1155, z późn. zm.) THE ACT OF 29 July 2005 on Waste Electrical and Electronic Equipment
Web link to original text:	Not received
Web link to text in English (if available)	 Act on waste electric and electron
Owner of the national register	Chief Inspectorate of Environmental protection
Organisation responsible for managing the national register	Chief Inspectorate of Environmental protection
Name of the national register and Web link	<a href="http://www.gios.gov.pl/?language=2">http://www.gios.gov.pl/?language=2</a> (PL) List of registered producers <a href="http://rzseie.gios.gov.pl/szukaj_rzseie.php">http://rzseie.gios.gov.pl/szukaj_rzseie.php</a> (PL)
Specific link for registration and reporting (if applicable)	Registration and reporting <a href="http://www.gios.gov.pl/artykuly/podkategoria/159/Waste-electrical-and-electronic-equipment">http://www.gios.gov.pl/artykuly/podkategoria/159/Waste-electrical-and-electronic-equipment</a>
Registration of EEE producer done via national register	No Registration form is available as pdf. form that needs to be filled in and send either by email (with electronic signature) to the authority's email via e-government portal ( <a href="http://epuap.gov.pl/">http://epuap.gov.pl/</a> ) or send by post.
Reporting of EEE producers done via national register	No Registration form is available as pdf. form that needs to be filled in and send either by email (with electronic signature) to the authority's email via e-government portal ( <a href="http://epuap.gov.pl/">http://epuap.gov.pl/</a> ) or send by post.

## 10.22. Portugal

**Table 10-47: Portugal**

Title of national legislative acts	Decree-Law n.º 67/2014 of 7th May, approving the legal framework for the management of waste electrical and electronic equipment
Web link to original text:	<a href="http://www.amb3e.pt/Cache/binImagens/DL67-2014-2385.pdf">http://www.amb3e.pt/Cache/binImagens/DL67-2014-2385.pdf</a>
Web link to text in English (if available)	Not available
Owner of the national register	Portuguese Environment Agency
Organisation responsible for managing the national register	ANREEE - Associação Nacional para o Registo de EEE, a non-profit private entity licensed by the Portuguese Environment Agency. <i>Note: as foreseen in our new WEEE legislation, the register of producers will be responsibility of the new Register and Coordination Center, which also accumulates other responsibilities.</i>
Name of the national register and Web link	SIRP <a href="https://www.anreee.pt/uk/">https://www.anreee.pt/uk/</a> (PT; EN)
Specific link for registration and reporting (if applicable)	Registration <a href="https://www.anreee.pt/uk/pagina/17/como-faco-o-registo/">https://www.anreee.pt/uk/pagina/17/como-faco-o-registo/</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template

## 10.23. Romania

**Table 10-48: Romania**

Title of national legislative acts	Governmental Decision no. 1037/2010 on waste electrical and electronic equipment's
Web link to original text:	<a href="http://www.recolamp.ro/downloads/HG_1037_2010.pdf">http://www.recolamp.ro/downloads/HG_1037_2010.pdf</a>
Web link to text in English (if available)	Not available
Owner of the national register	National Environmental Protection Agency (NEPA)
Organisation responsible for managing the national register	National Environmental Protection Agency (NEPA)
Name of the national register and Web link	<a href="http://www.anpm.ro/">http://www.anpm.ro/</a> (RO)
Specific link for registration and reporting (if applicable)	Not available
Registration of EEE producer done via national register	No Filling in MS Word document and sending to the authority by postal mail or submitting in person.
Reporting of EEE producers done via national register	Yes, partially Online web template (for collective systems) MS Word document and Excel document (for individual schemas)

## 10.24. Slovakia

**Table 10-49: Slovakia**

Title of national legislative acts	Act on Waste Nr. 223/2001 Z.z. on waste in sound of all changes. <i>Note: New legislation transposition the WEEE directive 2012 is in preparation with expected entry into force in January 2016.</i>
Web link to original text:	<a href="http://www.minzp.sk/files/oblasti/odpady-a-obaly/zakon-o-odpadoch.pdf">http://www.minzp.sk/files/oblasti/odpady-a-obaly/zakon-o-odpadoch.pdf</a> <i>Note: It is planned that the new legislation will be available in EN, DE and FR languages.</i>
Web link to text in English (if available)	Not available
Owner of the national register	Ministry of the Environment of the Slovak Republic (MoE)
Organisation responsible for managing the national register	Ministry of the Environment of the Slovak Republic (MoE)
Name of the national register and Web link	<a href="http://www.minzp.sk/en/">http://www.minzp.sk/en/</a> (SK; EN)
Specific link for registration and reporting (if applicable)	Not available
Registration of EEE producer done via national register	No MS Word document needs to be filled in and send by post to the Ministry.
Reporting of EEE producers done via national register	No MS Word document needs to be filled in and send by post to the Ministry.

## 10.25. Slovenia

**Table 10-50: Slovenia**

Title of national legislative acts	Decree on the Management of waste electronic and electric equipment; Official Journal of RS 107/2006  Decree on environmental tax on the generation of waste electrical and electronic equipment; Official Journal of RS 32 /2006  <i>Note: New legislation transposing WEEE Directive from 2012 is expected to be adopted in June 2015.</i>
Web link to original text:	Not available
Web link to text in English (if available)	Not available
Owner of the national register	Environmental Agency and Customs Administration.
Organisation responsible for managing the national register	Environmental Agency and Customs Administration.
Name of the national register and Web link	<a href="http://www.arso.gov.si/en/">http://www.arso.gov.si/en/</a> (SI; EN) <a href="http://www.carina.gov.si/en/">http://www.carina.gov.si/en/</a> (SI; EN)
Specific link for registration and reporting (if applicable)	Not available
Registration of EEE producer done via national register	No  Registration form is available in pdf. format that needs to be filled in and send to the authorities' (EPA and customs) by postal mail or by email.  <i>Note: Online web template is foreseen with the new legislation.</i>
Reporting of EEE producers done via national register	No  Reporting template is available in pdf. format that needs to be filled in and send to the authorities' by postal mail or email.

## 10.26. Spain

**Table 10-51: Spain**

Title of national legislative acts	Royal Decree 208/2005, of February 25, on electrical and electronic equipment and their wastes management.  Royal Decree 110/2015 of February 20, on waste electrical and electronic equipment.
Web link to original text:	<a href="http://www.weeregistration.com/weee-registration/Spain_Royal-Decree-No-208_2005_es.pdf">http://www.weeregistration.com/weee-registration/Spain_Royal-Decree-No-208_2005_es.pdf</a>
Web link to text in English (if available)	Not available
Owner of the national register	Ministry of Industry, Energy, and Tourism
Organisation responsible for managing the national register	Ministry of Industry, Energy, and Tourism
Name of the national register and Web link	<a href="http://www.minetur.gob.es/">http://www.minetur.gob.es/</a> (ES; EN)
Specific link for registration and reporting (if applicable)	Registration (ES) <a href="https://oficinavirtual.mityc.es/raee/(S(bvnexllxd5oz2vtxyajl4kjm))/Registro/NuevoRegistro.aspx?ModoReg=Empresa">https://oficinavirtual.mityc.es/raee/(S(bvnexllxd5oz2vtxyajl4kjm))/Registro/NuevoRegistro.aspx?ModoReg=Empresa</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template and XML format



## 10.27. Sweden

**Table 10-52: Sweden**

Title of national legislative acts	Ordinance on producer responsibility for electrical and electronic equipment (2014:1075)
Web link to original text:	<a href="http://www.notisum.se/rnp/sls/fakta/a0141075.htm">http://www.notisum.se/rnp/sls/fakta/a0141075.htm</a>
Web link to text in English (if available)	Not available
Owner of the national register	Swedish Environment Protection Agency (SEPA)
Organisation responsible for managing the national register	Swedish Environment Protection Agency (SEPA)
Name of the national register and Web link	<a href="http://eeb.naturvardsverket.se/In-english/">http://eeb.naturvardsverket.se/In-english/</a> (EN; SE)
Specific link for registration and reporting (if applicable)	Registration <a href="http://eeb.naturvardsverket.se/Globala-sidor/Foretagsuppgifter/?typeId=0">http://eeb.naturvardsverket.se/Globala-sidor/Foretagsuppgifter/?typeId=0</a>
Registration of EEE producer done via national register	Yes Online web template
Reporting of EEE producers done via national register	Yes Online web template or by email

## 10.28. United Kingdom

**Table 10-53: United Kingdom**

Title of national legislative acts	The Waste Electrical and Electronic Equipment Regulations 2013
Web link to original text:	<a href="http://www.legislation.gov.uk/uksi/2013/3113/contents/made">http://www.legislation.gov.uk/uksi/2013/3113/contents/made</a>
Web link to text in English (if available)	<a href="http://www.legislation.gov.uk/uksi/2013/3113/contents/made">http://www.legislation.gov.uk/uksi/2013/3113/contents/made</a>
Owner of the national register	The Environment Agency (England) is responsible for managing the register for the whole of the UK (England, Wales, Northern Ireland and Scotland)
Organisation responsible for managing the national register	The Environment Agency (England)
Name of the national register and Web link	National Packaging Waste Database (NPWD) <a href="http://npwd.environment-agency.gov.uk/">http://npwd.environment-agency.gov.uk/</a>
Specific link for registration and reporting (if applicable)	Registration <a href="http://npwd.environment-agency.gov.uk/Public/WEEHome.aspx">http://npwd.environment-agency.gov.uk/Public/WEEHome.aspx</a>
Registration of EEE producer done via national register	Yes Online web template (for small producers) XML file (for compliance schemas) <i>Note: Further improvement of the existing register is underway that would give a possibility to the compliance schemas to submit the XML files directly to the register instead of current practice of submitting the XML file by email to the authority. This is planned to be ready by 2016.</i>
Reporting of EEE producers done via national register	Yes Online web template (for small producers) XML file (for compliance schemas)

## 10.29. Norway

**Table 10-54: Norway**

Title of national legislative acts	The WEEE Directive is regulated in Chapter 1 in the Waste Regulation.
Web link to original text:	<a href="https://lovdata.no/dokument/SF/forskrift/2004-06-01-930">https://lovdata.no/dokument/SF/forskrift/2004-06-01-930</a>
Web link to text in English	Not available
Owner of the national register	Norwegian Environment Agency
Organisation responsible for managing the national register	A private company working on the contractual basis/supervised by the Agency
Name of the national register and Web link	<a href="http://www.miljodirektoratet.no/no/">http://www.miljodirektoratet.no/no/</a> (EN; NO)
Specific link for registration and reporting (if applicable)	Not applicable The register is populated with datasets from the customs system and compliance schemas.
Registration of EEE producer done via national register	No
Reporting of EEE producers done via national register	No

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## **11 Annex B- Business Analysis and proposal for harmonised data structure and format for registration**

### **11.1. Introduction**

The Directive lays down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste from electrical and electronic equipment (WEEE) and by reducing overall impacts of resource use and improving the efficiency of such use.

Article 16 of the Directive on "Registration, information and reporting", specifies that Member States shall draw up a register of producers, including producers supplying EEE by means of distance communication. The register shall serve to monitor compliance with the requirements of the Directive.

With regard to the registration process, Article 16(2)(a) states that Member States shall ensure that each producer, or each authorised representative (AR) is registered as required and has the possibility of entering online in their national register all relevant information reflecting that producer's activities in that Member State. Moreover, upon registering, each producer, or each authorised representative where appointed under Article 17 as appropriate, provides the information set out in Annex X, Part A, undertaking to update it as appropriate. (Art. 16(2) (b)).

### **11.2. Specific objectives**

Specific objectives of this document are threefold:

First, to describe the information elements as given in Annex X, part A to the Directive and identify those elements that are used by all Member States.

Second, to present any additional data fields that are currently requested by Member States as per national legislation.

Third, to depict a proposal for harmonised data structure and format for registration of EEE producers.

### **11.3. Methodology**

The European WEEE Registers Network (EWRN) proposed a draft harmonised format for Registration and Reporting of EEE producers to the national register in August 2012.<sup>64</sup>

This proposal was used as a starting point for preparation of the structured questionnaire for the survey conducted during the period of February-March 2015. In one of the questions, national authorities representatives (EU-28 Member States and Norway) were asked to indicate which of the registration data are currently

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[https://www.ewrn.org/fileadmin/ewrn/content/documents/120824\\_EWRN\\_Proposal\\_for\\_harmonised\\_registration\\_and\\_reporting\\_formats\\_-\\_fin.pdf](https://www.ewrn.org/fileadmin/ewrn/content/documents/120824_EWRN_Proposal_for_harmonised_registration_and_reporting_formats_-_fin.pdf)

collected from the EEE producers according to the national legislation. Based on the feedback received from the national authorities, a proposal for harmonised data structure and format for registration is prepared.

The initial proposal was discussed at the stakeholders' workshop held on 22 June 2015 in Brussels, where each information element of the proposed format for registration of EEE were discussed.

Updated proposal for harmonised data structure and format for registration was presented at the Technical Adaptation Committee (TAC) on WEEE meeting on 9<sup>th</sup> September 2015. Comments received during the consultation period in September 2015 are taken into account and incorporated in this final report.

## **11.4. Section A1: Name and address of the producer or AR**

### **11.4.1. Legislation**

*Annex X, section A1 states the following:*

*"Name and address of the producer or of the authorised representative where appointed under Article 17 (postal code and location, street name and number, country, telephone and fax number, email, as well as a contact person).*

*In the case of an authorised representative as defined in Article 17, also the contact details of the producers that is represented."*

*Article 17 of the directive referred above states the following:*

*"1. Each Member State shall ensure that a producer as defined in Article 3(1) (f) (i) to (iii) established in another Member State is allowed, by way of exception to Article 3(1) (f) (i) to (iii), to appoint a legal or natural person established on its territory as the authorised representative that is responsible for fulfilling the obligations of that producer, pursuant to this Directive, on its territory." (Paragraph 1)*

*"2. Each Member State shall ensure that a producer as defined in Article 3(1) (f) (iv) and established on its territory, which sells EEE to another Member State in which it is not established, appoints an authorised representative in that Member State as the person responsible for fulfilling the obligations of that producer, pursuant to this Directive, on the territory of that Member State. (Paragraph 2)*

*"3. Appointment of an authorised representative shall be by written mandate." (Paragraph 3)*

## 11.4.2. Information Elements

A proposal of the European Association of WEEE Registers Network (EWRN) from 2012, and further detailed, has been used as a starting point in this study. Table below presents the working proposal of dataset against which the MS authorities were asked to indicate which data are already collected as per national legislation and which additional data (if) are requested from the EEE producers.

**Table 11-55: Information elements of the section A1**

<b>IE No:</b>	<b>Information Element (IE) short name</b>	<b>IE indicative description</b>
<b>1.</b>	Name of producer	Name of producer to be registered that places EEE on the market
<b>2.</b>	Trading as (if different from above)	Trading name <sup>65</sup> of the producer to be registered that places EEE on the market
<b>3.</b>	Address of producer	Address of the Company's Registered Office (or principal place of business/headquarter/if not a registered company)
	Street name	
	Number	
	Postal code	
	Location	
	Country name	
<b>4.</b>	Contact person (of the producer)	Appointed Contact person of the producer
	First name	
	Family name	
	Phone number	
	Fax number	
	<i>Email address</i>	
<b>5.</b>	Authorised representative	Authorised representative is acting in the name and on behalf of the producer
	Type of authorised representative	Authorised representative could be a natural person (an individual) or legal person (a company)
	Natural person (an individual)	Authorised representative is an individual
	First name	
	Family name	
	Address (street name and number, postal code and location, country)	
	Information (Email, Phone and Fax number) of the authorised representative	
	Legal person (company)	An authorised representative is a company
	Name of the company	

<sup>65</sup> A trade name is generally considered the name a business uses for advertising and sales purposes that is different from the legal name in its articles of incorporation or other organizing documents. A trade name can also be referred to as a "Fictitious Name" or a "Doing Business As" (DBA). Source: [http://www.invention-protection.com/ip/publications/docs/Legal\\_Name\\_Trade\\_Name\\_Trademark.html](http://www.invention-protection.com/ip/publications/docs/Legal_Name_Trade_Name_Trademark.html)

	Address of the company (street name and number; postal code and location; country)	
	Contact person in the company	
	Information (Email, Phone and Fax number of the contact person)	
	Name of producer that is represented	
	Address of the producer	
	Street name	
	Number	
	Postal code	
	Location	
	Country name	

### 11.4.3. Detailed analysis and mapping

This section presents a detailed analysis and mapping of each of the information element of the section A1 to the national authorities templates with objective of identifying in which countries these data fields are included or not, and if any additional fields are added in the national templates.

#### **1. Information Element: Name of Producer**

- Current status on the inclusion of the IE 'Name of Producer' in MS Registration form

**Table 11-56: Inclusion of IE 'Name of Producer' in MS templates**

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included in the Registration form	29	AT; BE; BG; HR; CY; CZ; DK; EE; FI; FR; DE; EL; HU; IE;IT;LV; LT <sup>1</sup> ; LU; MT; NL; PT; PL; RO; SK; ES; SI; SE; UK; NO <sup>2</sup>
2.	Additional fields are also included	8	EE; FR; HU; LT; LU; NL; RO; ES

#### Details:

<sup>1</sup> Lithuania: added 'and/or importer details'.

<sup>2</sup> Norway: Data from customs

- Additional fields included to the IE 'Name of Producer' per country

**Table 11-57: Additional data fields included in the national templates**

ID	Additional fields included	MS
	Baseline number	8
1.1.	Type of producer	FR
1.1.1	Manufacturer selling products manufactured in the country under his own brand	FR; NL
	Chamber of Commerce Number- producer	NL
	VAT No. of producer	NL
1.1.2	Importer (importing from a non-EU country)	FR
	Chamber of Commerce Number- producer	NL
	Chamber of Commerce Number -representative	NL
	VAT No. of producer	NL
	VAT No. of (authorised) representative	NL
	Doc. Authorisation (art.21)	NL
1.1.3	Introducer (importing from an EU country)	FR; NL
	Chamber of Commerce Number No. representative	NL
	VAT No. of (authorised) representative	NL
	Doc. Authorisation (art.21)	NL
1.1.4	Distributor selling exclusively under his own brand	FR
1.1.5	Distance seller	FR
1.2.	Environmental client ID	HU
1.3.	Company name	HU; LU; SE
1.4.	Legal form and name of the natural person of the name	LT
1.5.	Legal or natural person code	LT
1.6.	VAT code	LT
1.7.	Company type	LT
	Lithuanian company	LT
	Lithuania acting foreign company branch	LT
	A foreign person	LT
	National Register Office No (Romania)	RO
1.8.	EHAKI Code (Estonia) <sup>66</sup>	EE

<sup>66</sup> Estonian administrative and settlement division classification (abbreviation: EHAK; formerly also: Estonian administrative and settlement units classification) is a database of systematic and classified according to the Estonian counties, municipalities (cities, towns) and settlement units (villages, small towns, municipal towns).



1.9	NACE code	EE
1.10.	Business Registration Number	EE
1.11	Main activity description	EE

## **2. Information Element: Trading name of producer**

- Current status on the inclusion of the IE2 'Trading name of producer'

**Table 11-58: Inclusion of 'Trading name of producer' in MS templates**

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	11	AT; BE; BG; HR; CZ; FI; EL; HU; IE; MT; UK.
2.	No, not included	13	CY;DK; FR; IT; LV; LT; LU; PL; PT; RO; ES; SE; NO
3.	No information	5	EE; DE; NL; SK; SI

- Additional fields included to the IE2 'Trading name of Producer' per country  
Not applicable.

## **3. Information Element: Address of producer**

In the questionnaire document, the IE3 'Address of producer' includes the following attributes:

- Street name
  - Number
  - Postal code
  - Location
  - Country
- Current status on the inclusion of IE3 'Address of producer'

**Table 11-59: Inclusion of 'Address of producer' in MS templates**

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included in the MS registration form	28	AT; BE; BG; HR; CY; CZ; DK; EE; FI; FR; DE; EL; HU; IE;IT;LV; LT; LU; MT; NL; PT; PL; RO; SK; ES; SI; SE; UK;
2.	Additional fields are also included	2	LV; LT <sup>1</sup>
3.	Other	1	NO <sup>2</sup>

Details:

<sup>1</sup> Latvia: Information element of 'Additional address (if different from the first one)' is also included in the national registration form.

<sup>2</sup>Norway: For the field of 'country' it is possible to insert only Norway

- Additional fields included to the IE3 'Address of producer' per country

**Table 11-60: Additional fields for address of producer per country**

No.	Additional fields included	MS
	Baseline number	2
1.	Street type	LV
2.	Household No	LV
3.	Flat No	LV
4.	Web address	LT
5.	Bank account	LT
6.	Province	LT
7.	Municipality	LT

#### **4. Information Element: 'Contact person of producer'**

In the proposal as presented in the questionnaire, the IE4 'Contact person of producer' includes the following attributes:

- First name
  - Family name
  - Phone number
  - Fax number
  - Email address
- Current status on the inclusion of the IE4 'Contact person of producer'

**Table 11-61: Inclusion of 'Contact person of producer' in MS templates**

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, the IE4 with <u>all</u> above listed attributes	28	AT; BE; BG; HR; CY; CZ; DK; EE; FI; FR; DE; EL; HU; IE; IT; LV; LT; LU; MT; NL; PT; PL; RO; SK; ES; SI; SE; UK
2.	Yes, the IE4 included but some attributes are omitted	5	LT; <sup>1</sup> RO; <sup>2</sup> NL; <sup>3</sup> SK; <sup>3</sup> ES <sup>3</sup>
3.	Additional fields are also included	2	LT <sup>4</sup> ; PT <sup>5</sup>
4.	Other	1	NO

Details:

<sup>1</sup>Lithuania: Attributes 'First name' and 'Family name' not included in the registration form

<sup>2</sup>Romania: Phone and fax number are not included

<sup>3</sup>Netherlands, Slovakia and Spain: Fax number is not included

<sup>4</sup>Latvia: Additional field included is mobile number of the producer.

<sup>5</sup>Portugal: National registration form in Portugal includes the following two fields: Classification of Economic Activity (CAE) and Period concerned (Date when the company started to place on the market). Following the comment received from Portugal during the consultation period in September 2015, these additional fields are associated with the section on the 'National identification code of producer'.

## **5. Information Element: 'Authorised representative'**

In the proposal as presented in the questionnaire, the IE5 'Authorised representative' includes the following attributes and sub-elements:

- **Type of authorised representative**
- Natural person
  - First name
  - Family name
- Address - natural person
  - Street name
  - Street number
  - Postal code
  - Location
  - Country
- Contact information of the authorised representative- Natural person
  - Email address
  - Phone number
  - Fax number
- **Legal person (company)**
  - Name of the company
- Address of the company
  - Street name
  - Street number
  - Postal code
  - Location
  - Country
  - Contact person in the company
- Information of the contact person in the company

- Email address
- Phone number
- Fax number
- **Name of producer that is represented**
- Address of the producer that is represented
  - Street name
  - Street number
  - Postal code
  - Location
  - Country

- **Current status on the inclusion of the IE5 'Authorised representative'**

**Table 11-62: Inclusion of 'Authorised representative' in MS templates**

No.	IE 'Authorised representative'	MS National Registration Form			
		Yes, included	No, not included	Also, additional fields added	No info
	IE5: Authorised representative	AT; BE; BG; CY <sup>1</sup> ; CZ; DK <sup>2</sup> ; EE; FI <sup>4</sup> ;HU;IE; IT; MT <sup>12</sup> ; LV; LT;NL; SK;SI <sup>9</sup> ; ES <sup>10</sup> ; SE; UK; (20)	FR <sup>5</sup> ; EL; PL; PT <sup>7</sup> ; RO; NO <sup>11</sup> ;		LU <sup>6</sup> ;
1.	<b>Type of authorised representative</b>	AT; BG;CZ; EE; HU;IE;IT; MT; LT; NL;SK; SE; UK;(13)	BE;HR; DK; EL;LV; MT; PL; PT; RO;		
2.	<b>Natural person</b>	AT; BG; CZ; EE; HU;IE; IT; MT; LT; NL; SK <sup>8</sup> ; SE; UK; (13)	BE; HR; DK; EL; LV;PL; PT; RO;		
3.	First name	AT; BE; BG; CZ; EE;DE; HU;IE; IT; MT;NL; SK; SE; UK;(14)	HR; DK; EL; LV; LT; PL; PT; RO;		
4.	Family name	AT; BE; BG; CZ; EE; DE; HU;IE; IT; MT; NL; SK; SE; UK; (13)	HR; DK; EL; LV; LT; PL; PT; RO;		
5.	<i>Address of natural person</i>	AT; BE; BG; CZ; EE; DE; HU;IE; MT; LT; NL; SK; SE; UK;(14)	HR; DK; EL; IT; LV; PL; PT; RO;		
6.	Street name	AT; BE; BG; CZ; EE; DE; HU;IE; MT; LT; NL; SK; SE; UK; (14)	HR; DK; EL; IT; LV; PL; PT; RO;		
7.	Street number	AT; BE; BG; CZ; EE; DE; HU;IE; MT; LT; NL; SK; SE; UK; (14)	HR; DK; EL; IT; LV; PL; PT; RO;		
8.	Postal code	AT; BE; BG; CZ; EE; DE; HU;IE; MT; LT; NL; SK; SE; UK; (14)	HR; DK; EL; IT; LV; PL; PT; RO;		
9.	Location	AT; BE; BG; CZ; EE; DE; HU;IE; MT; LT; NL; SK; SE; UK; (14)	HR; DK; EL; IT; LV; PL; PT; RO;		

10.	Country	AT; BE; BG; CZ; EE; DE; HU;IE; MT; LT; NL; SK; SE; UK; (14)	HR; DK; EL; IT; LV; PL; PT; RO;		
11.	<i>Contact information of authorised representative</i>	AT; BE; BG; CZ; EE; DE; HU;IE; MT; IT;LT; NL; SK; SE; UK;(15)	HR; DK; EL; LV; PL; PT; RO;		
12.	Email address	AT; BE; BG; CZ; EE; DE; HU;IE; MT; IT; LT; NL; SK; SE; UK;(15)	HR; DK; EL; LV; PL; PT; RO;		
13.	Phone number	AT; BE; BG; CZ; EE; DE; HU;IE; MT; IT; LT; NL; SK; SE; UK;(15)	HR; DK; EL; LV; PL; PT; RO;		
14.	Fax number	AT; BE; BG; CZ; EE; DE; HU;IE; IT; MT; LT; SE; UK; (13)	HR; DK; EL; LV; NL; PL; PT; RO; SK;	LT; SK;	
15.	<b>Legal person (company)</b>	AT; BG; HR;CZ; EE; HU;IE; IT; MT; LV; LT; NL; SK;SI; SE; UK;(16)	BE; DE; EL; PL; PT; RO;		
16.	<i>Address (company)</i>	AT; BG; HR;CZ; DK; EE; DE; HU;IE; IT; MT. LV; LT; NL; SK; SI; SE; UK; (18)	BE; EL; PL; PT; RO;	LV	
17.	Street name	AT; BG; HR;CZ; DK; EE; DE; HU;IE; IT; MT; LV; LT; NL; SK; SI; SE; UK;(18)	BE; EL; PL; PT; RO;		
18.	Street number	AT; BG; HR;CZ; DK; EE; DE; HU;IE; IT; MT. LV; LT; NL; SK; SI; SE; UK; (18)	BE; EL; PL; PT; RO;		
19.	Postal code	AT; BG; HR;CZ; DK; EE; DE; HU;IE; IT; MT; LV; LT; NL; SK; SI; SE; UK; (18)	BE; EL; PL; PT; RO;		
20.	Location	AT; BG; HR;CZ; DK; EE; DE; HU;IE; IT; MT; LV; LT; NL; SK; SI; SE; UK; (18)	BE; EL; PL; PT; RO;		
21.	Country	AT; BG; HR; CZ; DK; EE; DE; HU;IE; IT; MT. LV; LT; NL; SK; SI; SE; UK; (18)	BE; EL; PL; PT; RO;		
22.	Contact person in the company	AT; BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT; LV; LT; NL; SK; SI; SE; UK; (19)	EL; PL; PT; RO;		
23.	<i>Information of the contact person in the company</i>	AT; BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT; MT; LV; LT; NL; SK; SI; SE; UK;(19)	EL; PL; PT; RO;		

24.	Email address	AT; BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT;MT; LV; LT; NL; SK; SI; SE; UK; (19)	EL; PL; PT; RO;		
25.	Phone number	AT; BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT;MT; LV; LT; NL; SK; SI; SE; UK; (19)	EL; PL; PT; RO;		
26.	Fax number	AT; BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT;MT; LV; LT; SK; SI; SE; UK; (18)	EL; NL; PL; PT; RO;	LV; LT;	
27.	<b>Name of producer that is represented</b>	AT; BE; BG; HR; CZ; DK; EE;HU;IE; IT; MT; LV; SK; SI; SE; UK; (16)	DE; EL; LT; PL; RO;		NL; PT;
28.	<i>Sub-element: Address (company)</i>	AT; BE; BG; HR; CZ; DK; EE; HU;IE; IT; MT; LV; SK; SI; SE; UK; (16)	DE; EL; LT; PL; RO;	LV	NL; PT;
29.	Street name	AT; BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT;MT; LV; SK; SI; SE; UK; (17)	EL; LT; PL; RO;		NL; PT;
30.	Street number	AT; BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT;MT; LV; SK; SI; SE; UK;(17)	EL; LT; PL; RO;		NL; PT;
31.	Postal code	AT;BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT; MT; LV; SK; SI; SE; UK;(17)	EL; LT; PL; RO;		NL; PT;
32.	Location	AT; BE; BG; HR; CZ; DK; EE; DE; HU;IE; IT; MT; LV; SK; SI; SE; UK; (17)	EL; LT; PL; RO;		NL; PT;
33.	Country	AT; BE; BG; HR; CZ; DK <sup>3</sup> ; EE; DE; HU;IE; IT; MT; LV; SK; SI; SE; UK;(17)	EL; LT; PL; RO;		NL; PT;

Details:

<sup>1</sup>Cyprus: Only data filed on 'authorised representative'; however, no information on existence of specific data fields.

<sup>2</sup>Denmark: Information about 'authorised representative' include; however, only in case of the legal entity (company). It must be designated through the DPA system.

<sup>3</sup>Denmark: Country information for an authorised representative is always Denmark; the representative is always Danish and represents the country outside Denmark.

<sup>4</sup>Finland: Only data filed on 'authorised representative'; however, no information on existence of specific data fields.

<sup>5</sup>France: Implementation of information for 'authorised representative' planned for 2016

<sup>6</sup>Luxembourg: Annex X information transposed into national legislation; however, no detailed information (field-by-field) in the responses to the questionnaire.

<sup>7</sup>Portugal: Possibility to appoint an authorised representatives is not yet in operation.

<sup>8</sup>Slovakia: Natural person must be an entrepreneur- in Slovakia, we define this person Legal person-company or physical person.

<sup>9</sup>Slovenia: Detailed form will be prepared once the legislation is adopted. Most probably data requirements will be the same for legal/natural person.

<sup>10</sup>Spain: For us, authorised representative is the same as the producer as it takes all the responsibilities.

<sup>11</sup>Norway: Not yet transposed

<sup>12</sup> Malta: Digital copy of the registration form is available online on MEPA's website: <https://www.mepa.org.mt/waste-weee>



- Additional fields included to the IE5 'Authorised representative' per country

**Table 11-63: Additional fields on 'AR' in MS templates**

No.	Additional fields included	MS
	Baseline number	3
1.	IE 'National identification code' in case of an authorised representative- Legal person/company.	LV
2.	IE 'Actual address' with the following data: street name; street number; postal code, location, web, bank account; - in case of an authorised representative- Legal person/company	LV
3.	IE 'Actual address' with the following data: street name; street number; postal code, location, web, bank account; - for Producer that is represented	LV
4.	Additional fields for IE 'Address' in case of authorised representative-Natural person. These are: street type, Home no.; Apartment No.	LT
5.	Additional fields for IE ' <i>Contact information of the authorised representative</i> ', and these are: mobile number; Web page	LT
6.	IE 'Natural person code' in case of an authorised representative- Natural person	LT
7.	IE 'Legal person code' in case of an authorised representative-Legal person/company	LT
8.	Additional fields for IE ' <i>Contact information of the authorised representative</i> ', - web page.	SK

#### 11.4.4. Initial proposal for harmonised data structure

Taking into account the above assessment of the current situation and legislative requirements, the following initial proposal for harmonised structure and format for Section A1 was presented for discussion at the stakeholders' workshop on 22 June 2015 in Brussels.

##### **IE: 'Type of Producer'**

##### 1. Type of Producer

1.1 Manufacturer selling products manufactured in the MS under his own name or trademark

1.2. Introducer (importing from another EU Member State)

1.3. Importer (importing from a third country)

1.4. Distance seller

1.4.1. Distance seller established in MS

1.4.2. Distance seller established in another MS

1.4.3. Distance seller established in non-EU country (in a third country)

**1. IE: 'Name of Producer'**

For each producer listed above, the following data should be included:

1. Name of Producing Company

**2. IE: 'Trading name of Producer '**

1. Trading name of Producer

**3. IE: ' Address of Producer'**

1. Registered Address of Producer
  - 1.1. Street name
  - 1.2. Street number
  - 1.3. Postal code
  - 1.4. Location
    - 1.4.1. Province
    - 1.4.2. Municipality
  - 1.5. Country
  - 1.6. Web address
2. Actual Address of Producer (if different from one in point 1)  
The attributes from 1-6 are the same as above.

**4. IE: 'Contact person of Producer'**

1. Name of Contact person of producer
  - 1.1. Title (Mr, Ms)
  - 1.2. First name
  - 1.3. Family name
  - 1.4. Phone number
  - 1.5. Fax number
  - 1.6. Email address

**5. IE5 'Authorised Representative of Producer'**

1. Type of Authorised Representative (AR)
  - 1.1. Natural Person
  - 1.2. Legal person
2. Name of Authorised Representative- Natural Person
  - 2.1. Title (Mr; Ms)
  - 2.2. First Name
  - 2.3. Family Name
3. Name of Authorised Representative- Legal person
  - 3.1. Name of the company
4. Name of EEE Producer represented
  - 4.1. Registered name of the Producer represented

- 
5. Authorised Representative (AR) Identification Number
    - 5.1. National Identification Number or Tax Identification Number (TIN) or corresponding
    - 5.2. Legal Person identification number
      - 5.2.1. Business Registration number in the MS (e.g. Chamber of Commerce Number)
      - 5.2.2. VAT Number of the Authorised Representative in the MS (advised)
      - 5.2.3. EU NACE code of economic activity
  6. Address of Authorised Representative-Natural person
    - 6.1. Street name
    - 6.2. Street number
    - 6.3. Postal code
    - 6.4. Location
      - 6.4.1. Province
      - 6.4.2. Municipality
    - 6.5. Country
  7. Address of Authorised Representative-Legal Person
    - 7.1. Registered address of AR –legal person
    - 7.2. Actual address of AR-legal person
  8. Contact information of AR-Natural person
    - 8.1. Phone number
    - 8.2. Fax number
    - 8.3. Email address
    - 8.4. Mobile number
  9. Contact information of AR-Legal person
    - 9.1. Name of contact person in the company
      - 9.1.1. Title
      - 9.1.2. First name
      - 9.1.3 Family name
    - 9.2. Phone number of contact person
    - 9.3. Fax number of contact person
    - 9.4. Email address
    - 9.5. Mobile number
  10. Validity period of authorisation

#### **11.4.5. Final proposal for harmonised data structure and format**

Based on the stakeholders comments received during the consultation period in June and September 2015, this section presents an updated proposal for the section on name and address of producer or authorised representative as appropriate.

For each data field it is indicated if the field is a mandatory (M) or voluntary (V).

##### **1. Producer**

- 
- 1.1. Name of Producer<sup>67</sup> (M)
    - 1.1.1. Producer – Company
      - 1.1.1.1. Name of the Company
    - 1.1.2. Producer-Natural person (M)<sup>68</sup>
      - 1.1.2.1. First name (M)
      - 1.1.2.2. Last name (M)
  - 1.2. Trading Name of Producer (V)<sup>69</sup>
  - 1.3. Type of Producer (V)<sup>70</sup>
    - 1.3.1. Manufacturer selling products manufactured in the MS under his own name or trademark
    - 1.3.2. Importer (importing from another EU Member State)<sup>71</sup>
    - 1.3.3. Importer (importing from a third country)
    - 1.3.4. Distance seller<sup>72</sup>
      - 1.3.4.1. Distance seller established in another MS
      - 1.3.4.2. Distance seller established in non-EU country
  - 1.4. Legal Address of Producer (M)
    - 1.4.1. Street name (M)
    - 1.4.2. Street number (M)
    - 1.4.3. Postal code (M)

---

<sup>67</sup> Noting the definition of a Producer in accordance with Article 3(f) of the Directive, the Producer can be any 'natural or legal person'.

<sup>68</sup> Denmark and Hungary suggested to exclude the possibility of a Producer being a Natural person. However, noting the definition of a Producer and taking into account that in other MS (e.g. Germany) number of Producers-Natural person could be significant, it is proposed to keep this data requirement at the mandatory level.

<sup>69</sup> [http://www.invention-protection.com/ip/publications/docs/Legal\\_Name\\_Trade\\_Name\\_Trademark.html](http://www.invention-protection.com/ip/publications/docs/Legal_Name_Trade_Name_Trademark.html)

<sup>70</sup> This information is introduced on a voluntary basis, meaning, that MS may introduce this typology of producers into their national registration forms. While some MS (e.g. Germany, Denmark) expressed its opinion of no relevancy or purpose for this information, other countries (e.g. Croatia, Spain, Malta) support inclusion of this information with objective of traceability, for example, producers from another EU MS and producers from third countries. Thus, this information is kept at the voluntary basis.

<sup>71</sup> Acknowledging suggest received from Malta during the consultation period in September 2015, to change the name from 'introducer' to 'importer' (importing from another EU MS).

<sup>72</sup> Noting the comments received from some MS (e.g. Denmark, Malta, Spain), distance seller in the context of this study is defined a type of producer that sells by means of distance communication and is established in another Member State or in a third country. This means that any distance seller established in its home country, who sells EEE to another MS in which is not established, would need to appoint Authorised Representative in that MS as the responsible for fulfilling the obligations of that producer.

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#### 1.4.4. Location/City (M)

##### 1.4.4.1. Province (V)

##### 1.4.4.2. Municipality (V)

#### 1.4.5. Country (M)

#### 1.4.6. Website address (V)

### 1.5. Contact person of Producer (M)<sup>73</sup>

Proposed definition of Contact person = "Contact person means a person associated with a company as a point of communication. It is a particular individual within a company or other organization who is selected as the point of initial or regular communication with that organization or its concerns."<sup>74</sup>

#### 1.5.1. First name (M)

#### 1.5.2. Last name (M)

#### 1.5.3. Phone number (M)

#### 1.5.4. Mobile phone number (V)

#### 1.5.5. Fax number (M)

#### 1.5.6. Email address (M)

## 2. Authorised Representative (AR)

Proposed definition of AR = "means any natural or legal person established in the Member State who, explicitly designated by a Producer established in another Member state or a third country and who acts instead of the Producer with regard to the latter's obligation under this Directive in that Member State."<sup>75,76</sup>

### 2.1. Name of Authorised Representative (M)

#### 2.1.1. Authorised Representative- Legal person (M)

##### 2.1.1.1. Name of the Company (M)

#### 2.1.2. Authorised Representative- Natural person (M)

##### 2.1.2.1. First name (M)

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<sup>73</sup> During the Workshop discussion held on 22 June 2015, stakeholders raised importance of having the contact details of the person responsible for registration by the producer and proposed its inclusion at the mandatory level. Moreover, industry representatives asked for definition of a 'contact person' since quite often within the company is discussed who and at which level this person should be.

<sup>74</sup> Source: Phorio standards; <http://standards.phorio.com/?t=definition&code=5835270378>; cited on 24/06/2015

<sup>75</sup> This definition of AR is inspired by the definition of AR given in the DG SANCO Guideline document for Authorised Representatives from January 2012, in the context of the EC Directive on Medical devices. This document has been also mentioned in the EWRN Proposal for implementation of AR from June 2013.

<sup>76</sup> Further updated definition as per suggestion received from Malta during consultation period in September 2015.

- 2.1.2.2. Last name (M)
- 2.2. Contact person of the Authorised Representative (M)
  - 2.2.1. First name (M)
  - 2.2.2. Last name (M)
- 2.3. Address of the Authorised Representative (M)
  - 2.3.1. Street name (M)
  - 2.3.2. Street number (M)
  - 2.3.3. Postal code (M)
  - 2.3.4. Location/City (M)
    - 2.3.4.1. Province (V)
    - 2.3.4.2. Municipality (V)
  - 2.3.5. Country (M)
  - 2.3.6. Website address (V)
- 2.4. National Identification Code of Authorised Representative (M)
  - 2.4.1. National VAT Number as appropriate (M)
  - 2.4.2. European tax (VAT) Number (V)
  - 2.4.3. National Registration Number (V), if Producer is a Legal person
  - 2.4.4. National Registration Number (M), if Producer is a Natural person<sup>77</sup>
- 2.5. Name of the Producer that is represented (M)
  - 2.5.1. Producer-Legal person
    - 2.5.1.1. Name of the company
  - 2.5.2. Producer-Natural person
    - 2.5.2.1. First name
    - 2.5.2.2. Last name
- 2.6. Contact details of the Producer that is represented (M)

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<sup>77</sup> Noting the comments received that in case of an Authorised Representative-Natural person, the VAT number will not be available, but rather the national registration number (e.g. from the Chamber of Commerce in Germany, Croatia, etc.), this field is indicated at a mandatory level. This number could be for example, registration number from the national Chamber of Commerce (Germany, Croatia, Netherlands, Italy), or Register of businesses, or Registration number issued by the IT application after providing the log-in credentials (Ireland, Portugal, Denmark, Germany, etc.).

- 2.6.1. Phone number (M)
- 2.6.2. Mobile number (V)
- 2.6.3. Fax number (M)
- 2.6.4. Email address (M)
- 2.7. National Identification Code of the Producer that is represented (M)<sup>78</sup>
  - 2.7.1. National VAT number (M)
  - 2.7.2. European tax number (V)
  - 2.7.3. National Registration Number (V), if Producer is a Legal person
  - 2.7.4. National Registration Number (M), if Producer is a Natural person
- 2.8. Date of authorisation <sup>79</sup>
  - 2.8.1. Date of authorisation given to the Authorised Representative by the Producer (M)

## 11.5. Section A2: National identification code of the producer

### 11.5.1. Legislation

Annex X, section A2 states the following:

“National identification code of the producer, including European tax number or national tax number of the producer. ”

### 11.5.2. Information elements

A proposal of the European Association of WEEE Registers Network (EWRN) from 2012, and further detailed, has been used as a starting point in this study.

**Table 11-64: Information elements of the section A2**

IE No:	Information Element (IE) short name	IE indicative description
6.	National identification code of the producer	Company's registration number (e.g. Chamber of Commerce, Business Register, etc.)
6.1.	European VAT	European tax number
6.2.	National Tax number	Company's national tax number

<sup>78</sup> Following suggestion of some MS (e.g. Denmark, Spain) it is included the National Identification Code of Producer as mandatory field in the template.

<sup>79</sup> Date of authorisation refers to the date of the agreement signed between the Producer and the Authorised representative. During the stakeholders workshop held on 22 June 2015, it has been highlighted as important for the enforcement purposes date of agreement between the producer and its appointed AR.

## 6. Information Element: 'National identification code of producer'

- Current status on the inclusion of the IE6 'National identification code' in MS Registration form

**Table 11-65: Inclusion of 'National identification code' in MS forms**

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	24	AT;BE;BG;HR; DK <sup>1</sup> ; EE; FI; FR; EL; IE; IT;LV;LT;MT;NL;PL;PT;RO;SK;SI;ES; SE; UK; NO
2.	No, not included	3	DE; HU; LU
3.	Also, additional fields	3	FR; HU; PT <sup>2</sup>
4.	No info	1	CY

### Details:

<sup>1</sup>Denmark: In Denmark, the first data to be registered about a producer/authorised representative is the company identification code (which always has a connection to a country). Based on this number the country is automatically given. If it is a Danish number, the name and address of the company is automatically given. The identification code also tells if the company needs an authorised representative or not. (IF DK-no; if EU- shall have; if outside EU-have AR).

<sup>2</sup>Portugal: In line with the comments received during the consultation period in September 2015, the following two fields initially associated with IE4 'Contact person of producer' are added in this section.

- Additional fields included to the IE6 'National Identification code' per country

**Table 11-66: Additional data on 'National identification code' included in MS forms**

No.	Additional fields included	MS
	Baseline number	3
1.	NAF code <sup>80</sup>	FR
2.	Statistical code	HU
3.	CAE: Classification of Economic Activity	PT
4.	Period concerned (date when the company started to PoM)	PT

<sup>80</sup> The French classification of activities (NAF Rev. 2) is the national statistical classification of activities which has superseded since January 2008 NAF rev. 1, the latter being in use since January 2003. For each NAF sub-class, there is a link to CPF, French classification of products, showing the list (code and heading) of the associated products. It also gives access to the entire CPF. Since January 2015, the CPF has been updated. Source: National Institute of Statistics and Economic Studies; <http://www.insee.fr/en/methodes/default.asp?page=nomenclatures/naf2008/naf2008.htm>



### **6.1. Information Element: 'European tax number'**

- Current status on the inclusion of the 'European tax number' in MS Registration form

**Table 11-67: Inclusion of 'European tax number' in MS templates**

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	13	AT; BE; BG; HR; DK <sup>1</sup> ; FR; DE; EL; HU; IT; SK; SI; SE
2.	No, not included	14	CZ; FI; IE; LV; LT; LU; MT; NL; PL; PT; RO; ES; UK; NO
3.	No info received	2	CY; EE

Details:

<sup>1</sup>Denmark: Only if it is a non-Danish company. It is still a national VAT number, but a VAT number connected to the legal entity in that MS where the producer is at home.

- Additional fields included to the 'European tax number' per country  
Not additional fields included.

### **6.2. Information element: 'National VAT number'**

- Current status on the inclusion of the 'National VAT number' in MS Registration form

**Table 11-68: Inclusion of 'National VAT number' in MS templates**

No.	Inclusion in MS Registration form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	25	AT; BE; BG; HR;DK; FI; FR; DE; EL; HU; IE; IT; LT; LU; MT; NL; PL; PT; RO; SK; SI; ES; SE; UK; NO
2.	No, not included	2	CZ; LV;
3.	No info received	2	CY; EE;

- Additional fields included to the IE8 'National VAT number' per country

No additional fields included in any of MS national registration forms.

#### **11.5.3. Initial proposal for harmonised data structure and format**

Taking into account the above assessment of the current situation and legislative requirements, the following initial proposal for harmonised structure and format for

the section A2 was presented for discussion at the stakeholders' workshop on 22 June 2015 in Brussels.

### **IE6: National Identification code of the producer**

#### *1. EU NACE code of economic activity<sup>81</sup>*

- 1.1. NAF Code (FR)
- 1.2. Statistical code (HU)
- 1.3. CAE: Classification of Economic Activity (PT)

#### *2. European tax number*

#### *3. National VAT number*

### **11.5.4. Final proposal for harmonised data structure and format**

Based on the stakeholders comments received during the consultation period in June and September 2015, this section presents an updated proposal for the section on name and address of producer or authorised representative as appropriate.

For each data field it is indicated if the field is a mandatory (M) or voluntary (V).

1. National VAT Number (M)
2. European tax (VAT) Number (V)
3. National Registration Number (V), if Producer is a Legal person
4. National Registration Number (M), if Producer is a Natural person<sup>82</sup>

### **11.6. Section A3: Category of EEE set out in Annex I or Annex III**

#### **11.6.1. Legislation**

Annex X, section A3 states the following:

"Category of EEE set out in Annex I or Annex III, as appropriate"

#### **11.6.2. Information elements**

A proposal of the European Association of WEEE Registers Network (EWRN) from 2012, and further detailed, has been used as a starting point in this study.

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<sup>81</sup> EU NACE code system is the European standard for classification of economic activities. NACE stands for "Nomenclature Generale des Activites Economiques dans l'Union Europeenne" (General Name for Economic Activities in the European Union). The current version is based on "International Standard Industrial Classification of all economic activities" (ISIC) of the United Nations. Source: <http://www.ellispub.com/eclo/help/nace.htm>

<sup>82</sup> Noting the comments received that in case of an Authorised Representative-Natural person, the VAT number will not be available, but rather the national registration number (e.g. from the Chamber of Commerce in Germany, Croatia, etc.), this field is indicated at a mandatory level. This number could be for example, registration number from the national Chamber of Commerce (Germany, Croatia, Netherlands, Italy), or Register of businesses, or Registration number issued by the IT application after providing the log-in credentials (Ireland, Portugal, Denmark, etc.).

**Table 11-69: Information elements of the section A3**

<b>IE No:</b>	<b>Information Element (IE) short name</b>	<b>IE indicative description</b>
<b>7.</b>	Categories of EEE covered by this Directive during the transitional period from 13 August 2012 to 14 August 2018	List of categories as defined in Annex I of the WEEE directive
	Large household applications	Note: Including corresponding sub-categories as defined in Annex II of the Directive
	Small household applications	
	IT and telecommunications equipment	
	Consumer equipment	
	Lighting equipment	
	Electrical and electronic tools	
	Toys, leisure and sports equipment	
	Medical devices	
	Monitoring and control instruments	
Automatic dispenses		
<b>8.</b>	Categories of EEE covered by this Directive during the transition period from 15 August 2018	List of categories as defined in Annex I of the WEEE directive
	Temperature exchange equipment	Note: Including corresponding, non-exhaustive sub-categories as defined in the Annex IV of the Directive.
	Screens, monitors	
	Lamps	
	Large equipment	
	Small equipment	
	Small IT and telecommunication equipment	

### 11.6.3. Detailed analysis and mapping

This section presents a detailed analysis and mapping of information elements of the section A3 (IE No.7 and IE No.8) to the national authorities templates with objective of identifying in which countries these data fields are included or not, and if any additional fields are added in the national templates

#### **7. Information Element: 'Categories of EEE during period 2012-2018'**

- Current status on the inclusion of the IE7 'Categories of EEE during period 2012-2018'

**Table 11-70: Status on inclusion of Annex I EEE categories by MS**

No.	EEE Categories 2012-2018	Yes, included	No, not include	Additional fields added	No info received
1.	Large household applications	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT <sup>1</sup> ; LV; LT; LU; MT; NL PL;PT; RO; SK <sup>2</sup> ; SI; ES <sup>3</sup> ; SE; UK;	AT; NO	FI; EL; LT; SI	CY;
2.	Small household applications	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT <sup>1</sup> ; LV; LT; LU; MT; NL PL;PT; RO; SK <sup>2</sup> ; SI; ES <sup>3</sup> ; SE; UK;	AT; NO	FI; LT;	CY;
3.	IT and telecommunica tions equipment	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT <sup>1</sup> ; LV; LT; LU; MT; NL PL;PT; RO; SK <sup>2</sup> ; SI; ES <sup>3</sup> ; SE; UK; (25)	AT; NO	FI; EL; LT	CY;
4.	Consumer equipment	26 MS as above	AT; NO	DK; FI; EL; HU; LT;	CY;
5.	Lighting equipment	26 MS as above	AT; NO	DK; FI; LT	CY;
6.	Electrical and electronic tools	26 MS as above	AT; NO	FI;LT	CY;
7.	Toys, leisure and sports equipment	26 MS as above	AT; NO	FI; LT	CY;
8.	Medical devices	26 MS as above	AT; NO	FI; LT	CY;
9.	Monitoring and control instruments	26 MS as above	AT; NO	FI; LT	CY;
10.	Automatic dispenses	26 MS as above	AT; NO	FI; FR; LT; ES; UK	CY;

Details:

<sup>1</sup>Italy: For each of 10 categories includes list of EEE as defined in Annex II

<sup>2</sup>Slovakia: The list of categories and indicative list of WEEE is in separate Annex to act on waste and regulations. The producer by registration must have defined the category, subcategory of EEE and B2B or B2C using.

<sup>3</sup>Spain: The current Spanish legislation up to 21 February, regards not the current Directive but to the previous one. The list are those which are specified in the former directive.

- Additional fields/categories included to the IE7 'Categories of EEE during period 2012-2018' per country

**Table 11-71: Additional data included in the MS registration forms**

ID	Category EEE 2012-2018	Additional categories included	MS
1.	Large household applications	Market area	FI
		Refrigerators, freezers and other appliances used for refrigeration	EL
		Air conditioner appliances	EL
		Large household appliances (if different from above)	EL
		Food services/hospitality appliances	EL
		Cooling equipment	SI
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
2.	Small household applications	Market area	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
3.	IT and telecommunications equipment	Market area	FI
		Screens	EL
		IT and telecommunications equipment	EL
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
4.	Consumer equipment	PV panels	DK; HU
		Market area	FI
		Televisions	EL
		Consumer equipment (if different)	EL
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
5.	Lighting equipment	Lamps	DK; EL

		Luminaires	DK;EL
		Market area	FI
		Gas discharge lamps	SI
		Bank guarantee	LT
		Contract	LT
		A declaration of Republic of Lithuania	LT
6.	Electrical and electronic tools	Market area	FI
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
7.	Toys, leisure and sports equipment	Market area	FI
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
8.	Medical devices	Market area	FI
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
9.	Monitoring and control instruments	Market area	FI
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
10.	Automatic dispensers	Market area	FI
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Vending machines	ES
		Display equipment	UK
		Cooling appliances containing refrigerant	
		Gas discharge lamps and LED Light source	
		PV panels	

**8. Information Element: 'Categories of EEE from 15 August 2018'**

- Current status on the inclusion of the IE8 'Categories of EEE from 15 August 2018'

**Table 11-72: Status on inclusion of Annex III EEE categories by MS**

No.	EEE Categories 2012-2018	Yes, included	No, not include	No info received
1.	Large household applications	AT; BE; CY; HR;CZ; EE; HU <sup>2</sup> ;LT; PT; SK <sup>3</sup> ; SI; (11)	DK <sup>1</sup> ; FI; FR; DE; EL; IE; IT; LV; LU; MT; NL; PL; RO; ES; SE; UK; NO (17)	CY
2.	Small household applications	AT; BE; CY; HR;CZ; EE; HU;LT; PT; SI; (10)	As above DK; FI; FR; DE; EL; IE; IT; LV; LU; MT; NL; PL; RO; ES; SE; UK; NO (17)	CY
3.	IT and telecommunications equipment	As above	As above	CY
4.	Consumer equipment	As above	As above	CY
5.	Lighting equipment	As above	As above	CY
6.	Electrical and electronic tools	BE; CY; HR;CZ; EE; HU;LT; PT; SI; (9)	As above AT; DK; FI; FR; DE; EL; IE; IT; LV; LU; MT; NL; PL; RO; ES; SE; UK; NO (18)	CY

Details:

<sup>1</sup>Denmark: It will be implemented from 15 August 2018

<sup>2</sup>Hungary: It will be implemented from 2 January 2018

<sup>3</sup>Slovakia: After 2018 categorisation of EEE will be amended

- Additional fields included to the IE8 'Categories of EEE from 15 August 2018'

No additional fields included.

#### **11.6.4. Initial proposal for harmonised data structure and format**

Taking into account the above assessment of the current situation and legislative requirements, the following initial proposal for harmonised structure and format for Section A1 was presented for discussion at the stakeholders' workshop on 22 June 2015 in Brussels.

1. The list of 10 categories of EEE as defined in Annex I and the list of sub-categories as defined in the Annex II should be used for the registration.
2. The 6 categories as defined in Annex III and corresponding sub-categories as defined in Article IV of the Directive should be used in the registration process.

### **11.6.5. Final proposal for harmonised data structure and format**

#### **1. EEE Categories as per Annex I or Annex III as appropriate (M)**

- 1.1. Annex I- 10 categories of EEE during the transition period, i.e. until 14 August 2018 (M)
- 1.2. Annex III-6 categories of EEE during the transition period, i.e. from 15 August 2018 (M)

#### **2. EEE Sub-categories (V)**

A number of sub-categories have been already introduced by the majority of Member States as per national legislations, with significant diversity with regard to the number of the sub-categories (i.e. from fully transposed Annex II and Annex IV list of equipment to the countries with few additional categories). More specifically,

- 27 MS transposed the 10 categories of EEE as defined in Annex I of the Directive.

Exception is Austria which have established 6 categories and these are the following:

- Large appliances
  - Refrigerators and freezers
  - Screen devices, including picture tube devices
  - Small electrical appliances
  - Gas discharge lamps
  - Photovoltaic module
- 4 MS (Czech Republic, Luxembourg, Portugal<sup>83</sup> and Romania<sup>84</sup>) transposed in fully Annex II list of equipment as sub-categories for obligatory reporting.
  - 4 MS included a number of sub-categories for obligatory reporting
    - Germany (28 sub-categories)
    - Ireland (28 sub-categories)
    - Spain (14 sub-categories)

<sup>83</sup> Currently working on draft proposal to reduce the number of sub-categories.

<sup>84</sup> Idem



Existence of different EEE categorisations across the EU presents a red tape and burden for the industry, as they need to create MS-specific EEE categorisation systems instead of having an EU-wide agreed categorisation system in place.

Industry representatives request more harmonisation among the MS with regard to the EEE products categorisation. For example<sup>85</sup>, due to variability among MS, the very same product may be placed into at least three different categories. This forces the producers to collect all the information for each piece of equipment and to develop three different methods of reporting sales quantities rather than just one.

Having that in mind, an introduction of EEE sub-categories at a voluntary level is an attempt to add a 'common layer' among the vast number of the existing sub-categories introduced in the MS.

**The first proposal** being introduction of a common set of sub-categories to the Annex I categories 1, 3, 4 and 5 as these have been already introduced in some MS. Introduction of a common set of sub-categories *would not* prevent MS to establish further sub-categories as necessary. However, it means that each MS would need to introduce the identified 'layer' of sub-categories as the common denominator among all MS.

MS representatives expressed their concerns with the proposed introduction of a common set of sub-categories before 2018, and its impact on the existing sub-categories system as per national legislation. More specifically, it was highlighted the necessity for MS to keep their existing and/or establish further sub-categories as necessary (e.g. Germany, Ireland).

For example, in Ireland due to existence of the visible Environmental Management Cost (vEMC) there are 5 sub-categories introduced under the category 1- Large household appliances. With introduction of the proposed two sub-categories, 1.a. large household appliances used for refrigeration and 1.b. large household appliances not used for refrigeration, Ireland would need to *re-group* its existing 5 sub-categories under these proposed ones.

In this example, the proposed sub-categories system applied in case of Ireland and their existing system would be the following:

Category 1: Large household appliances

- a.** Large cooling appliances, refrigerators, freezers and other large appliances used for refrigeration (proposed common sub-category)
  - 1.1. Refrigerators (existing Ireland sub-category)
  - 1.2. Refrigerators (existing Ireland sub-category)
  - 1.2a Refrigerators (existing Ireland sub-category)
- b.** Large household appliances without refrigeration equipment (proposed common sub-category)
  - 1.3. Large appliances (existing Ireland sub-category)
  - 1.4. Medium appliances (existing Ireland sub-category)
  - 1.5. Small appliances (existing Ireland sub-category)

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<sup>85</sup> Test and Measurement Coalition- member companies

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**Proposal 1:** Definition of a 'common layer' of sub-categories for Annex I Categories 1, 3, 4 and 5 as these have been already introduced in some national MS.

1. Large household equipment
  - a. Large cooling appliances, refrigerators, freezers and other large appliances used for refrigeration
  - b. Large household appliances without refrigeration equipment
2. Small household appliances
3. IT and telecommunication equipment
  - a. IT and telecommunication equipment with monitors and CRT<sup>86</sup> screens
  - b. IT and telecommunication equipment without monitors and CRT<sup>87</sup> screens
4. Consumer equipment and PV
  - a. PV panels
5. Lighting equipment
  - a. Lamps
  - b. Luminaries
6. Electrical and electronic tools
7. Toys, leisure and sports equipment
8. Medical devices
9. Monitoring and control instruments
10. Automatic dispensers

**The second proposal** is introduction of the UNU keys as a possible EU-level e-waste categorisation and codification system instead of the existing Annex I and Annex III.

The UNU keys is a classification that establish relationships between the existing categorisation, and also with the classifications applied in the customs authorities (CN codes<sup>88</sup>). Noting the output of the recently published DG ENV Study on WEEE recovery targets, preparation for re-use targets and on the method for calculation of the recovery targets<sup>89</sup>, an introduction of UNU keys would facilitate and harmonise data collection in a structured way, creating a solid system for traceability and target monitoring.

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<sup>86</sup> Stands for "Cathode Ray Tube." CRT is the technology used in traditional computer monitors and televisions. Source: <http://techterms.com/definition/crt>

<sup>87</sup> Stands for "Cathode Ray Tube." CRT is the technology used in traditional computer monitors and televisions. Source: <http://techterms.com/definition/crt>

<sup>88</sup> The Combined Nomenclature (CN codes) is comprised of the Harmonized System (HS) nomenclature with further Community subdivisions. The Harmonized system is run by the World Customs Organisation (WCO). [http://ec.europa.eu/taxation\\_customs/customs/customs\\_duties/tariff\\_aspects/combined\\_nomenclature/index\\_en.htm](http://ec.europa.eu/taxation_customs/customs/customs_duties/tariff_aspects/combined_nomenclature/index_en.htm)

<sup>89</sup> [http://ec.europa.eu/environment/waste/weee/pdf/16.%20Final%20report\\_approved.pdf](http://ec.europa.eu/environment/waste/weee/pdf/16.%20Final%20report_approved.pdf)

MS representatives expressed strong positions (e.g. Germany, Austria, and UK) with regard to this proposal, highlighting that would increase bureaucracy and costs for the authorities and producers. Some MS recognize the importance of the proposal, but also that would have significant impacts that should be further studied (France) or that should be taken into account in case WEEE generated methodology is going to be considered (Spain).

A brief comparison of these two proposals is given below:

**Table 11-73: Pros and Cons of the proposals for EEE sub-category**

	<b>Pro's</b>	<b>Con's</b>
<b>Proposal 1:</b> Common set of sub-categories for Annex I Categories 1, 3, 4 and 5	<ul style="list-style-type: none"> <li>-already introduced in some MS</li> <li>-creates a 'middle ground' among MS with few to 100+ sub-categories</li> </ul>	<ul style="list-style-type: none"> <li>-in use until 2018 when need to change to 6 categories system</li> <li>-not a long term solution with regard to monitoring, traceability and exchange of information</li> </ul>
<b>Proposal 2:</b> UNU Keys as sub-categories for registration (and reporting)	<ul style="list-style-type: none"> <li>-robust system with one-to-many relation to Annex I and Annex III categories; also link to HS codes</li> <li>-increased traceability and monitoring of POM and WEEE generated.</li> <li>-facilitates info exchange</li> </ul>	<ul style="list-style-type: none"> <li>-requires a set of adjustments among players in the supply chain (producers, compliance scheme, authorities, etc.)</li> </ul>

The final proposal for harmonised structure and format, from a technical point of view (e.g. defined XML Schema document for categories) accommodates the possibility of having the EEE sub-categories on voluntary basis.

## **11.7. Section A4: Type of EEE**

### **11.7.1. Legislation**

Annex X, section A4 states the following:

*"Type of EEE (household or other than household equipment"*

### **11.7.2. Information elements**

A proposal of the European Association of WEEE Registers Network (EWRN) from 2012, and further detailed, has been used as a starting point in this study.

**Table 11-74: Information elements of the A4 section**

<b>IE No:</b>	<b>Information Element (IE) short name</b>	<b>IE indicative description</b>
<b>9.</b>	Type of EEE (household or other than household equipment)	The business type of equipment (B2C: households or B2B: other than households) for each of the before mentioned 10 categories (during the transition period)
	Household equipment	
	Other than household equipment	

### 11.7.3. Detailed analysis and mapping

#### **9. Information Element: 'Type of EEE (household or other than household)**

- Current status on the inclusion of the IE9 'Type of EEE (household or other than household)' in the MS national registration forms

**Table 11-75: Status on inclusion of 'Type of EEE' by MS**

<b>No.</b>	<b>Inclusion in MS Registration form</b>	<b>MS authorities</b>	<b>Details</b>
	Baseline number	29	
1.	Yes, included	25	AT; BE; BG; HR; CZ; DK; EE; FI; FR; DE; EL; HU; IE; IT; LT; LU; MT; NL; PT; RO; SK; SI; ES; SE; UK;
2.	No, not included	3	LV <sup>1</sup> ; PL; NO
3.	No info received	1	CY

#### Details:

<sup>1</sup>Latvia: The business types of EEE (B2C or B2B) for all categories together

- Additional fields included to the IE9 'Type of EEE (household or other than household) per country

No additional fields are included.

### 11.7.4. Initial proposal for harmonised data structure and format

For each of the 10 EEE categories during the transition period or 6 categories of EEE from 15 August 2018 it should be provided the following information:

1. Household EEE
2. Other than household EEE

### 11.7.5. Final proposal for harmonised data structure and format

For each of the 10 EEE categories during the transition period or 6 categories of EEE from 15 August 2018 it should be provided the following information:

1. Household EEE equipment (M)
2. Other than household EEE equipment (M)

## 11.8. Section A5: Brand of EEE

### 11.8.1. Legislation

Annex X, section A5 states the following:

"Brand name of EEE

### 11.8.2. Information elements

A proposal of the European Association of WEEE Registers Network (EWRN) from 2012, and further detailed, has been used as a starting point in this study. In the question 19 of the stakeholders' questionnaire, the following draft was included:

**Table 11-76: Information elements of the section A5**

IE No:	Information Element (IE) short name	IE indicative description
10.	Brand name <sup>90</sup> of EEE	
10.1	Brands of EEE	List of brands of EEE (per each of 10 categories until August 2018 / per each of 6 categories after 2018 and <i>corresponding sub-categories as defined in Annex II and IV as appropriate</i> )
10.2	Trademark <sup>91</sup> of EEE	

### 11.8.3. Detailed analysis and mapping

#### **10. Information Element: 'Brand name of EEE'**

- Current status on the inclusion of the IE10 'Brand name of EEE' in MS Registration form

<sup>90</sup> Brand name is defined an arbitrarily adopted name that is given by a manufacturer or merchant to an article or service to distinguish it as produced or sold by that manufacturer or merchant and that may be used and protected as a trademark. Source: Merriam-Webster dictionary; <http://www.merriam-webster.com/dictionary/brand%20name>

<sup>91</sup> 'A trademark may consist of any signs capable of being represented graphically, particularly words, including personal names, designs, letters, numerals, the shape of goods or of their packaging, provided that such signs are capable of distinguishing the goods or services of one undertaking from those of other undertakings.' Article 2, Directive 2008/95/EC of the European Parliament and of the Council; Source: <https://oami.europa.eu/ohimportal/en/trade-mark-definition>

**Table 11-77: Status on inclusion 'Brand name of EEE' by MS**

No.	Brand name	Yes, included	No, not include	Additional fields	No info received
1.	Brand name of EEE	AT; BE; BG; HR; CZ <sup>1</sup> ; DK; EE; FI; DE; EL; IE; IT; LV; MT; NL; PT <sup>2</sup> ; SK; SI; SE;	FR; LT; LU; RO; ES; UK; NO	DK; FR;	CY
1.1.	Brands of EEE	BG; DK; FI; EL; MT; NL; PT; SK; SI;	AT; BE; FR; IE; IT; LV; LT; LU; PL; RO; ES; SE; UK; NO		CY; EE; DE;
1.2.	Trademark	AT; BE; BG; DK; EE; FI; EL; MT; SK;	FR; IE; IT; LV; LT; LU; NL; PL; PT; RO; ES; SE; UK; NO		CY; DE; SI

Details:

<sup>1</sup>Czech Republic: It is included in the Register of EEE producer

<sup>2</sup>Portugal: Our legislation foresees the indication of brand name but this is not yet implemented.

- Additional fields included to the IE10 'Brand name of EEE' per country

**Table 11-78: Additional field included for 'Brand name of EEE' by MS**

ID	Additional fields included	MS
	Baseline number	
	HS Code/SH4 codification <sup>92</sup>	FR

**11.8.4. Initial proposal for harmonised data structure and format**IE10: Brand EEE

1. Brand name of EEE per each sub-category
2. Trademark of EEE per each sub-category
3. HS code

<sup>92</sup> The Nomenclature governed by the Convention on the Harmonized Commodity Description and Coding System, commonly known as "HS Nomenclature", is an international multipurpose nomenclature which was elaborated under the auspices of the World Customs Organization (WCO). The HS Nomenclature comprises about 5,000 commodity groups which are identified by a 6-digit code and arranged according to a legal and logical structure based on fixed rules. The Combined Nomenclature of the European Union (EU) integrates the HS Nomenclature and comprises additional 8-digit subdivisions and legal notes specifically created to address the needs of the Community.

Source:  
[http://ec.europa.eu/taxation\\_customs/customs/customs\\_duties/tariff\\_aspects/harmonised\\_system/index\\_en.htm](http://ec.europa.eu/taxation_customs/customs/customs_duties/tariff_aspects/harmonised_system/index_en.htm)

### 11.8.5. Final proposal for harmonised data structure and format

Brand name of EEE per each category (M)<sup>93</sup>

## 11.9. Section A6: Producer responsibility

### 11.9.1. Legislation

Annex X, section A6 states the following:

*"Information on how the producer meets its responsibilities: individual or collective scheme, including information on financial guarantee.*

### 11.9.2. Information elements

A proposal of the European Association of WEEE Registers Network (EWRN) from 2012, and further detailed, has been used as a starting point in this study.

**Table 11-79: Information elements of the section A6**

ID	Information Element (IE) short name	IE indicative description
11.	Information how producer meets its responsibilities	Relevant information how the producer meets his compliance (take-back obligations for WEEE): individual or with a collective scheme (relevant per category and type of equipment.
	Individual system	Individual system relevant per mentioned category and type of equipment
	Collective system	Collective system relevant per mentioned category and type of equipment
12.	Information on financial guarantee	Information to be provided how the producer will meet his responsibilities, i.e. either to join a collective system or to provide a guarantee such as a recycling insurance or a blocked bank account.
	Collective system	
	Guarantee	
	Recycling insurance	
	Blocked bank account	

<sup>93</sup> Noting that information on brand name of EEE is required as per Annex X of the Directive, and the majority of MS have already included this information in the national registration forms, it is proposed as a mandatory field.

### 11.9.3. Detailed analysis and mapping

This section presents a detailed analysis and mapping of each of the information element of the section A6 to the national authorities templates with objective of identifying in which countries these data fields are included or not, and if any additional fields are added in the national templates.

#### **11. Information Element: 'Extended Producer Responsibility'**

- Current status on inclusion of information on how a producer meets its responsibilities in the MS national registration templates

**Table 11-80: Status on inclusion of information on EPR in the national authority's registration templates**

No.	Info on (EPR)	Yes, included	No, not include	Additional fields	No info received
1.	Info on EPR	AT; BG; HR; CZ; EE; FI; FR; DE; IE; HU; IT; LV; LT; NL; PT <sup>3</sup> ; RO; SK; SI; ES; SE; UK; (21)	DK <sup>4</sup> ; LU; PL; NO (4)	LV; LU	BE; CY; IE; MT; (3)
1.1.	Individual system	AT; BG; HR <sup>1</sup> ; CZ; FR; IE; HU; IT <sup>2</sup> ; LV; LT; MT; NL; PT; RO; SK; SI; ES; SE; UK; (19)	DK; IE; LU; PL; NO		BE; CY; EE; FI; DE; (5)
1.2.	Collective system	AT; BG; HR <sup>1</sup> ; CZ; FR; IE; HU; IE; IT <sup>2</sup> ; LV; LT; MT; NL; PT; RO; SK; SI; ES; SE; UK; (20)	DK; LU; PL; NO (4)		BE; CY; EE; FI; DE; (5)

Details:

<sup>1</sup>Croatia: Individual scheme /Individual fulfilment is allowed only for categories 2, 3 and 4 of Annex 1 of Directive 2012/19/EU.

Collective system: Currently, the Fund is the only model of collective compliance system in Croatia that 'brings together' producers-who are obliged to pay fees, collectors, and waste treatment operators.

<sup>2</sup>Italy: Individual and collective systems for single WEEE.

<sup>3</sup>Portugal: To complete the register, the producer must have a valid contract with a collective system or an individual management system approved for each category of EEE placed on the market.

<sup>4</sup>Denmark: We automatically get this information. Based on their registration. Therefore we don't ask this information separately. The producer cannot choose a type of financial guarantee.

- Additional data fields included in the MS national registration templates related to this section



**Table 11-81: Additional data fields on EPR included by MS**

No.	Additional fields included	MS
	Baseline number	
1.	Name of the EPR compliance system	LV
2.	National identification code of producer	
3.	Legal address of the EPR compliance system	
4.	Date of agreement between the producer and EPR compliance system	
5.	Term of validity of a contract	
6.	Indicate the Ecotrel number <sup>94</sup>	LU

## **12. Information Element: 'Financial guarantee'**

- Current status on the inclusion of the 'Information on financial guarantee' in the MS national registration templates

**Table 11-82: Status on inclusion of 'financial guarantee' info by MS**

No.	Financial guarantee	Yes, included	No, not include	No info received
1.	Info on Financial guarantee	AT; BG; CZ; EE; FI; FR; HU; IE; IT; NL; PL; RO; SK; SI; ES <sup>3</sup> ; SE;	HR; DK <sup>1</sup> ; LV; UK; NO;	BE; CY; DE; EL; LU; MT;
1.1.	EPR compliance system	AT; BG; CZ; DK; EE; HU; IE; IT; MT; NL; SK; SI; ES; SE;	HR; FI; FR; EL; LV; PL; RO; UK; NO;	BE; CY; DE; LU;
1.2.	Guarantee	AT; BG; CZ; EE; FR; HU; MT; NL; PL; RO; SK; SI; ES; SE;	HR; DK; FI; EL; IE; IT <sup>2</sup> ; LV; UK; NO;	BE; CY; DE; LU;
	Recycling insurance	AT; BG; CZ; EE; FR; DE; HU; MT; SK; ES; SE;	HR; DK; FI; EL; IE; IT; LV; NL; PL; RO; SI; UK; NO;	BE; CY; CZ; LU;
	Blocked bank account	AT; BG; CZ; EE; FR; DE; HU; MT; SK; ES; SE;	HR; DK; FI; EL; IE; IT; LV; NL; PL; RO; SI; UK; NO;	BE; CY; LU;

### Details:

<sup>1</sup>Denmark: There is no alternative to choose from. DPA –system annually tells the producer/collective scheme to what degree they have to establish a financial guarantee for the coming 12 months and how the financial guarantee to be established. For producers with collective schemes the guarantee is a standard banks guarantee with unlimited access to DPA system. For individual

<sup>94</sup> Number issued by the Ecotrel, a non-profit association of more than 500 companies that support collection and recycling of EEE equipment. <http://www.ecotrel.org/en/index.html#Ecotrel>

producers, the money is deposited with DPA-system until the end of the year. If no costs occur, the money is returned.

<sup>2</sup>Italy: Information concerning the financial guarantee in the case of individual system is collected prior to the registration by the Ministry of Environment according to Italian reception decree 49/2014.

<sup>3</sup>Spain: This information must be given in advance to the regional governments only for individual systems. The regional government decide if the information given is useful or not.

- Additional fields included to 'Information on financial guarantee' per country

No additional fields are included.

#### **11.9.4. Initial proposal for harmonised data structure and format**

The following data should be provided per each of 10 EEE categories (and type of equipment) during the transition period and 6 EEE categories from 15 August 2018.

##### 1. Information on Extended Producer Responsibility (EPR)

###### 1.1. Individual system

###### 1.2. Collective system

###### 1.2.1 Name of the EPR compliance system

###### 1.2.2. Address of the EPR compliance system

###### 1.2.3. Date of agreement between the producer and the EPR compliance system

###### 1.2.4. Duration of the agreement between the producer and the EPR compliance system

##### 2. Information on Financial guarantee

###### 2.1. Type of guarantee

###### 2.2. Recycling insurance

###### 2.3. Blocked bank account

#### **11.9.5. Final proposal for harmonised data structure and format**

The Producer will indicate how s/he meets its responsibilities, i.e. individual or collective system, including information on financial guarantee. Below requested information will be mandatory at the EEE category level.

##### **1. Extended Producer Responsibility (EPR) (M)**

###### 1.1. Individual system

###### 1.2. Collective system

###### 1.2.1. Name of the collective scheme (M)

###### 1.2.2. Date of agreement between the Producer and collective system

"In case of the ceased activities and/or change of the selected scheme (individual or collective), the Producer is obliged to inform the responsible national authority at the earliest possibility and no

later than 30 days after the change of producer responsibility scheme and/or company ceased activities of EEE placing on the market. " (M)

## 2. Information on the Financial guarantee (M)

- 2.1. Membership in the collective scheme
- 2.2. Recycling insurance
- 2.3. Blocked bank account
- 2.4. Other

## 11.10. Section A7: Selling techniques

### 11.10.1. Legislation

Annex X, section A7 states the following:

"Selling techniques used (e.g. distance selling) "

### 11.10.2. Information Elements

A proposal of the European Association of WEEE Registers Network (EWRN) from 2012, and further detailed, has been used as a starting point in this study.

**Table 11-83: Information elements of the A7 section**

IE No:	Information Element (IE) short name	IE indicative description
13.	Selling technique used (e.g. distance selling) statement	Statement if producer is a seller using 'distance selling' technique

### 11.10.3. Detailed analysis and mapping

#### 13. Information Element: 'Selling techniques'

- Current status on the inclusion of the IE13 'Selling technique statement' in MS national registration templates

**Table 11-84: Status on inclusion of the 'Selling technique statement'**

No.	Selling technique statement	MS authorities	Details
	Baseline number	29	
1.	Yes, included	21	BG; HR; CZ <sup>1</sup> ; EE; FI; FR; DE; EL; HU; IE; IT; MT; LV;LT; NL; PT <sup>2</sup> ; SK; SI; ES <sup>3</sup> ;UK;
2.	No, not included	6	AT; DK; PL;RO; SE; NO
3.	Additional fields included	2	LT; NL
4.	No info received	3	BE; CY;LU;

Details:

<sup>1</sup>Czech Republic: It is included in the Register of EEE Producers

<sup>2</sup>Portugal: Foreseen in the legislation but not yet in practice

<sup>3</sup>Spain: This information must be given in advance to the regional government. The regional government decide if the information given is useful or not.

- Additional fields included to the IE15 'Selling technique statement' per country

**Table 11-85: Additional data fields included by MS**

No.	Additional fields included	MS
	Baseline number	
1.	Retail trade	LT
2.	Wholesale	
3.	Distance selling	
4.	Use for their own needs	
5.	Other (explain)	
6.	Sales through (online) store in the Netherlands	NL
7.	Sales through (online) store outside the Netherlands	NL

#### 11.10.4. Initial proposal for harmonised data structure and format

##### 1. Selling techniques used

###### 1.1. Retail trade<sup>95</sup>

###### 1.2. Wholesale

###### 1.3. Distance selling<sup>96</sup>

###### 1.3.1. MS where EEE is sold to

###### 1.3.2 Authorised representative(s) appointed per Member State (name/contact person/ contact info)

###### 1.4. Sales through (online) store in the MS

###### 1.5 Sales through (online) store outside in the MS

#### 11.10.5. Final proposal for harmonised data structure and format

The Producer based in the MS where is placing on the market will indicate at the category level if is also using distance selling technique, in which countries and also identity of AR in those countries. All information will be mandatory.

<sup>95</sup> Retail trade is defined in the International Standard Industrial Classification (ISIC) as the re-sale (sale without transformation) of new and used goods to the general public, for personal or household consumption or utilisation. Source: OECD; <https://stats.oecd.org/glossary/detail.asp?ID=2344>

<sup>96</sup> Distance contract 'distance contract' means any contract concluded between the trader and the consumer under an organised distance sales or service-provision scheme without the simultaneous physical presence of the trader and the consumer, with the exclusive use of one or more means of distance communication up to and including the time at which the contract is concluded. EU Directive on Consumer rights, 2011/83/EU, <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0083&rid=1>

1. Using Distance selling technique (yes/no) (M)<sup>97</sup>
2. List of countries in which the Producer sells by distance selling technique (M)
3. Name of Authorised Representative in the countries in which the Producer sells by distance selling (M)

## 11.11. Section A8: Declaration

### 11.11.1. Legislation

Annex X, part A8, states

*"Declaration stating that the information provided is true."*

### 11.11.2. Information elements

A proposal of the European Association of WEEE Registers Network (EWRN) from 2012, and further detailed, has been used as a starting point in this study. In the question 19 of the stakeholders' questionnaire, the following draft was included:

**Table 11-86: Information elements of the A8 section**

IE No:	Information Element (IE) short name	IE indicative description
14.	Declaration stating that the information provided is true	Declaration stating that the information provided upon registration or its alternation is true.

### 11.11.3. Detailed analysis and mapping

#### 13. Information Element: 'Declaration'

- Current status on the inclusion of the IE13 'Declaration statement' in MS Registration form

**Table 11-87: Status on inclusion of Declaration statement by MS**

No.	Selling technique statement	MS authorities	Details
	Baseline number	29	
1.	Yes, included	24	AT; BG; HR; CZ; DK; EE; FI; FR; DE; EL; HU; IE; IT; LV;LT; MT; NL; PT; RO; SK; SI; ES <sup>1</sup> ;UK; NO
2.	No, not included	2	PL; SE;
3.	Additional fields included	1	IE
4.	No info received	3	BE; CY;LU;

<sup>97</sup> Based on the workshop discussion this information is included at the mandatory level.

Details:

<sup>1</sup>Spain: This information must be given in advance to the regional government. The regional government decide if the information given is useful or not.

- Additional fields included to the IE13 'Declaration statement' per country

**Table 11-88: Additional information included by MS**

No.	Additional fields included	MS
	Baseline number	
1.	Declaration that EEE is RoHS compliant	IE
2.	Declaration that reports will be submitted on time	IE

#### **11.11.4. Initial proposal for harmonised data structure and format**

##### **IE13: Declaration statement**

"All information provided is true."

#### **11.11.5. Final proposal for harmonised data structure and format**

"I/We declare that the information provided in this document is true and provides an accurate reflection of the type of EEE placed on the market by the above named organisation." (M)

## 11.12. Harmonised data structure and format for registration of EEE producers

This section presents proposed harmonised structure and format for *registration* of EEE producers. The data fields indicated with '(M)' are mandatory fields to be included by the national authorities in their national templates and corresponding registry systems. On the other side, the data fields indicated with '(V)' are fields that can be included by the national authorities on the voluntary basis.

This proposed harmonised structure and format for registration will serve as a basis for the implementing act to be developed by the Commission under the Article 16(3) of the Directive.

### A1: Name and address of the Producer or Authorised Representative

#### PRODUCER

##### 1. Producer

###### 1.1. Name of Producer (M)

###### 1.1.1. Producer – Company

###### 1.1.1.1. Name of the Company

###### 1.1.2. Producer-Natural person (M)<sup>98</sup>

###### 1.1.2.1. First name (M)

###### 1.1.2.2. Last name (M)

###### 1.2. Trading Name of Producer (V)

###### 1.3. Type of Producer (V)<sup>99</sup>

###### 1.3.1. Manufacturer selling products manufactured in the MS under his own name or trademark

###### 1.3.2. Importer (importing from another EU Member State)

###### 1.3.3. Importer (importing from a third country)

###### 1.3.4. Distance seller<sup>100</sup>

<sup>98</sup> Denmark and Hungary suggested to exclude the possibility of a producer being a natural person. However, noting the definition of a producer and taking into account that in other MS (e.g. Germany) number of producers-natural person could be significant, it is proposed to keep this data requirement mandatory.

<sup>99</sup> This information is introduced on a voluntary basis, meaning, that MS may introduce this typology of producers into their national registration forms. While some MS (e.g. Germany, Denmark) expressed its opinion of no relevancy or purpose for this information, other countries (e.g. Croatia, Spain, Malta) support inclusion of this information with objective of traceability, for example, producers from another EU MS and producers from third countries. Thus, this information is kept at the voluntary basis.

1.3.4.1. Distance seller established in another MS

1.3.4.2. Distance seller established in non-EU country

**1.4. Legal Address of Producer (M)**

1.4.1. Street name (M)

1.4.2. Street number (M)

1.4.3. Postal code (M)

1.4.4. Location/City (M)

1.4.4.1. Province (V)

1.4.4.2. Municipality (V)

1.4.5. Country (M)

1.4.6. Website address (V)

**1.5. Contact person of Producer (M)<sup>101</sup>**

Proposed definition of Contact person = "Contact person means a person associated with a company as a point of communication. It is a particular individual within a company or other organization who is selected as the point of initial or regular communication with that organization or its concerns."<sup>102</sup>

1.5.1. First name (M)

1.5.2. Last name (M)

1.5.3. Phone number (M)

1.5.4. Mobile phone number (V)

1.5.5. Fax number (M)

1.5.6. Email address (M)

**2. Authorised Representative (AR)**

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<sup>100</sup> Noting the comments received from some MS (e.g. Denmark, Malta, Spain), distance seller in the context of this study is defined a type of producer that sells by means of distance communication and is established in another Member State or in a third country. This means that any distance seller established in its home country, who sells EEE to another MS in which is not established, would need to appoint Authorised Representative in that MS as the responsible for fulfilling the obligations of that producer.

<sup>101</sup> During the Workshop discussion held on 22 June 2015, stakeholders raised importance of having the contact details of the person responsible for registration by the producer and proposed its inclusion at the mandatory level.

<sup>102</sup> Source: Phorio standards; <http://standards.phorio.com/?t=definition&code=5835270378>; cited on 24/06/2015



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Authorised Representative means any natural or legal person established in the Member State who, explicitly designated by a Producer established in another Member state or a third country and who acts instead of the Producer with regard to the latter's obligation under this Directive in that Member State.<sup>103,104</sup>

**2.1. Name of Authorised Representative (M)**

2.1.1. Authorised Representative- Legal person (M)

2.1.1.1. Name of the Company (M)

2.1.2. Authorised Representative- Natural person (M)

2.1.2.1. First name (M)

2.1.2.2. Last name (M)

**2.2. Contact person of the Authorised Representative (M)**

2.2.1. First name (M)

2.2.2. Last name (M)

**2.3. Address of the Authorised Representative (M)**

2.3.1. Street name (M)

2.3.2. Street number (M)

2.3.3. Postal code (M)

2.3.4. Location/City (M)

2.3.4.1. Province (V)

2.3.4.2. Municipality (V)

2.3.5. Country (M)

2.3.6. Website address (V)

**2.4. National Identification Code of Authorised Representative (M)**

2.4.1. National VAT Number (M)

2.4.2. European tax (VAT) Number (V)

2.4.3. National Registration Number (V), if Producer is a Legal person

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<sup>103</sup> This definition of AR is inspired by the definition of AR given in the DG SANCO Guideline document for Authorised Representatives from January 2012, in the context of the EC Directive on Medical devices. This document has been also mentioned in the EWRN Proposal for implementation of AR from June 2013.

<sup>104</sup> Further updated definition as per suggestion received from Malta during consultation period in September 2015.

2.4.4. National Registration Number (M), if Producer is a Natural person<sup>105</sup>

**2.5.**Name of the Producer that is represented (M)

2.5.1. Producer-Legal person

2.5.1.1. Name of the company

2.5.2. Producer-Natural person

2.5.2.1. First name

2.5.2.2. Last name

**2.6.**Contact details of the Producer that is represented (M)

2.6.1. Phone number (M)

2.6.2. Mobile number (V)

2.6.3. Fax number (M)

2.6.4. Email address (M)

**2.7.** National Identification Code of the Producer that is represented (M)<sup>106</sup>

2.7.1. National VAT number (M)

2.7.2. European tax number (V)

2.7.3. National Registration Number (V), if Producer is a Natural person

2.7.4. National Registration Number (M), if Producer is a Legal person

**2.8.**Date of authorisation<sup>107</sup>

2.8.1. Date of authorisation given to the Authorised Representative by the Producer (M)

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<sup>105</sup> Noting that in case of an Authorised Representative-Natural person, the VAT number will not be available, but rather the national registration number (e.g. from the Chamber of Commerce in Germany, Croatia, etc.), this field is indicated as mandatory. This number could be for example, registration number from the national Chamber of Commerce (Germany, Croatia, Netherlands, Italy), or Register of businesses, or Registration number issued by the national register/IT application after providing the log-in credentials (Ireland, Portugal, Denmark, etc.).

<sup>106</sup> Following suggestion of some MS (e.g. Denmark, Spain) it is included the National Identification Code of Producer at the mandatory level in the template.

<sup>107</sup> Date of authorisation refers to the date of the agreement signed between the Producer and the Authorised representative. During the stakeholders workshop held on 22 June 2015, it has been highlighted as important for the enforcement purposes.

## **A2: National Identification Code of the Producer**

1. National VAT Number (M)
2. European tax (VAT) Number (V)
3. National Registration Number (V), if Producer is a Legal person
4. National Registration Number (M), if Producer is a Natural person

## **A3: Category of EEE set out in Annex I or III as appropriate**

### **1. EEE Categories as per Annex I or Annex III as appropriate (M)**

- 1.1. Annex I: 10 categories of EEE during the transition period, i.e. until 14 August 2018 (M)
- 1.2. Annex III: 6 categories after the transition period, i.e. from 15 August 2018 (M)

### **2. EEE Sub-categories (V)**

## **A4: Type of EEE (household or other than household equipment)**

For each of 10 EEE categories during the transition period (until 2018) or 6 categories of EEE from 15 August 2018 it should be provided the following information:

1. Household EEE (M)
2. Other than household EEE (M)

## **A5: Brand name of EEE**

The Producer is obliged to provide Brand name of EEE by the category of EEE.

1. Brand name of EEE (M)

## **A6: Extended Producer Responsibility (EPR)**

The Producer will indicate how s/he meets its responsibilities, i.e. individual or collective system. Below requested information will be mandatory at the EEE category level.

### **1. Extended Producer Responsibility (EPR) (M)**

- 1.1. Individual system (M)
  - 1.2. Collective system (M)
    - 1.2.1. Name of the EPR compliance system (M)
    - 1.2.2. Date of agreement between the Producer and EPR compliance system (M)

“In case of the ceased activities and/or change of the selected system (individual or collective), the Producer is obliged to inform the responsible national authority at the earliest possibility and no later than 30 days after the change of producer responsibility scheme and/or company ceased activities of EEE placing on the market.” (M)

**2. Information on the Financial guarantee as appropriate (M)**

2.1. Membership in the EPR compliance system

2.2. Recycling insurance

2.3. Blocked bank account

2.4. Other

**A7: Selling technique used**

The Producer based in the MS where is placing on the market will indicate at the category level if is also using distance selling technique, in which countries and also identity of AR in those countries. All information will be mandatory.

1. Using Distance selling technique (yes/no) (M)
2. List of countries in which the Producer sells by distance selling technique (M)
3. Name of Authorised Representative in the countries in which the Producer sells by distance selling (M)

**A8: Declaration**

“I/We declare that the information provided in this document is true and provides an accurate reflection of the type of EEE placed on the market by the above named organisation.” (M)

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## **12 Annex C- Business analysis and proposal for harmonised structure and format for reporting**

### **12.1. Introduction**

The Directive lays down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste from electrical and electronic equipment (WEEE) and by reducing overall impacts of resource use and improving the efficiency of such use.

Article 16 of the Directive on "Registration, information and reporting", specifies that Member States shall draw up a register of producers, including producers supplying EEE by means of distance communication. The register shall serve to monitor compliance with the requirements of the Directive.

With regard to the Reporting process, Article 16(2) (b) states that Member States shall ensure that each producer, or each authorised representative (AR) where appointed under Article 17, provides the information set out in Annex X, Part B.

### **12.2. Specific objectives**

Specific objectives of this document are threefold:

First, to describe the information elements as listed in Annex X, part B to the Directive and to identify those elements that are used by all Member States.

Second, to present any additional data currently requested by Member States as per national legislation that is not listed in the Annex X, part B of the Directive.

Third, to depict a proposal for harmonised data structure and format for reporting, including frequency and period of reporting.

### **12.3. Methodology**

The European WEEE Registers Network (EWRN) proposed a draft harmonised format for Registration and Reporting of EEE producers to the national register in August 2012.<sup>108</sup>

This proposal was used as a starting point for preparation of the structured questionnaire for the survey conducted during the period of February-March 2015. In one of the questions, national authorities representatives (EU-28 Member States+ Norway) were asked to indicate which of the registration data are currently collected from the EEE producers according to the national legislation.

The initial proposal was discussed at the stakeholders Workshop held on 22 June 2015 in Brussels, where each information element of the proposed format for reporting was discussed.

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<sup>108</sup>

[https://www.ewrn.org/fileadmin/ewrn/content/documents/120824\\_EWRN\\_Proposal\\_for\\_harmonised\\_registration\\_and\\_reporting\\_formats\\_-\\_fin.pdf](https://www.ewrn.org/fileadmin/ewrn/content/documents/120824_EWRN_Proposal_for_harmonised_registration_and_reporting_formats_-_fin.pdf)

Updated proposal for harmonised data structure and format for reporting was presented at the Technical Adaptation Committee (TAC) on WEEE meeting on 9<sup>th</sup> September 2015. Comments received during the consultation period in September 2015 are taken into account and incorporated in the final report.

## 12.4. Section B1: National identification code of producer

### 12.4.1. Legislation

Annex X, section B1 states the following:

"National Identification Code of the Producer

### 12.4.2. Information Elements

**Table 12-89: Information elements of the B1 section**

IE No:	Information Element (IE) short name	IE indicative description
1.	National Identification Code of the producer	Company registered (Chamber of Commerce or Business register) number
1.1.	Commercial register number	
1.2.	Trade register number	

### 12.4.3. Detailed analysis and mapping

#### 1. Information Element: 'National Identification Code of the producer'

- Current status on the inclusion of the IE1 'National Identification code of the Producer' in MS national reporting templates

**Table 12-90: Status on inclusion of 'National identification code'**

No.	National Identification Code	Yes, included	No, not include	Additional fields	No info received
1.	National Identification Code of producer	AT;BE;BG;CZ;FI;FR;EL;HU;IE <sup>3</sup> ;LV;PL;SK;SI;ES;SE;UK;NO (17)	DK <sup>2</sup> ;DE; LT;PT <sup>4</sup> ;RO;	LV;LT;HU;PL; RO;	CY <sup>1</sup> ;HR;EE; MT;NL;
1.1.	Commercial register number	AT;BE;BG;HR;CZ;EE;FI;HU;IE;IT; LV;MT;SI;(13)	DK <sup>2</sup> ;FR;DE;EL;LT;LU; PT <sup>4</sup> ;RO; ES;SE;UK;NO (12)		CY <sup>1</sup> ;NL;SK;PL;
1.2.	Trade register number	AT;HR;CZ;FI;FR;HU; IE; LV; MT;SK; (10)	BE;DK <sup>2</sup> ;DE;EL;IT;LT; LU; PT <sup>4</sup> ;RO; SI; ES;SE;UK; NO (14)		CY <sup>1</sup> ;EE; NL;PL;

Details:

<sup>1</sup>Cyprus: Did not proceed with the new registration/reporting form

<sup>2</sup>Denmark: It is given during the Registration process. So, when the producer log in the electronic reporting format the information is already there.

<sup>3</sup>Ireland: Each producer is given a unique user name and password to login in to WEEE Blackbox system to submit its reports.

<sup>4</sup>Portugal: There is no need to ask for this information in the Reporting, since it is general data already communicated in the moment in the Register.

- Additional fields included to the IE1 'National Identification code of Producer' per country

**Table 12-91: Additional fields included in the national MS reporting forms**

No.	Additional fields included	MS
	Baseline number	5
1.	General information	LT
2.	Initial report	
3.	Advanced report	
4.	Reporting period	
5.	Report number of pages	
6.	Legal form and name of the natural person or the name	
7.	The legal or physical entity code	
8.	Legal or natural person registration of manufacturers and importer book code	
9.	Licensed organisation report, the name of the legal entity code	
10.	Authorised representative, name, code or the natural person name, personal identification number	
11.	The reporter personal name	
12.	The reporter phone number	
13.	The reporter fax number	
14.	The reporter email address	
15.	Statistical Code	HU
16.	National tax number	
17.	EU tax number	
18.	International tax number	HU; PL; RO
19.	Name of company	
20.	Address of the company	HU; PL; RO

21.	Province	PT	
22.	Place		
23.	Postal code		
24.	Street	PT	
25.	House number		
26.	No of premises		
27.	Phone number	HU; RO	
28.	Fax number	HU; RO	
29.	Email address	HU;RO	
30.	Contact person	RO	
31.	Person responsible to report	HU	
32.	-Producer		
33.	-Waste treatment responsible		
34.	-Coordinator organisation		
35.	-National coordinator		
36.	Individual scheme		
37.	Collective system		
38.	Financial guarantee required (Yes/No)		
39.	Financial institution		
40.	-Name of the institution		
41.	-Amount (of the guarantee)		
42.	Information of the data provider		
43.	-Name of the data provider		
44.	-Position		
45.	-Telephone		
46.	-Fax		
47.	-Email address		
48.	Name of producer or Authorised representative		LV
49.	Legal address		
50.	Registration date		
51.	Number in the EEE register		
52.	Name of producer that is represented (if applicable)		
53.	Identification code of represented producer (if applicable)		
54.	Legal address of represented producer (if applicable)		
55.	Name of producer or Authorised representative		



56.	Person completing the report	PL
57.	-First name	
58.	-Family name	
59.	-Phone	
60.	-Fax	
61.	-Email address	
62.	CAEN code of main activity <sup>109</sup>	RO
63.	C.U.I. <sup>110</sup>	

#### 12.4.4. Initial proposal for harmonised data structure and format

The National identification code of a producer should be a unique identifier for each EEE producer, and also harmonised with the one included in the Registration process.

Taking into account a proposal for the identification code of Producer in registration, it is proposed the same set of data fields. It is acknowledged that in the countries with IT systems (registers) in place, all registration-related information about the producer and/or authorised representative is already available in the system.

However, in countries where reporting is carried out using MS Word and or Excel documents, this information is asked again to be provided by the Producer. This should be avoided with use of the producer 'unique' national identifier.

#### **IE1 'National identification code of Producer'**

1. EU NACE code of economic activity
  - 1.1. NAF Code (FR)<sup>111</sup>
  - 1.2. Statistical code (HU)
  - 1.3. CAE: Classification of Economic Activity (PT)
2. European VAT Registration number
3. National Tax number

#### 12.4.5. Final proposal for harmonised data structure and format

<sup>109</sup> CAEN is term in Romania that corresponds to the NACE (Classification of Economic Activities in the European Community) code system.

<sup>110</sup> The Identity card (Romanian: Carte de identitate) is the document issued to every Romanian citizen at 14 years of age.

<sup>111</sup> The French classification of activities (NAF Rev. 2) is the national statistical classification of activities which has superseded since January 2008 NAF rev. 1, the latter being in use since January 2003. For each NAF sub-class, there is a link to CPF, French classification of products, showing the list (code and heading) of the associated products. It also gives access to the entire CPF. Since January 2015, the CPF has been updated. Source: National Institute of Statistics and Economic Studies; <http://www.insee.fr/en/methodes/default.asp?page=nomenclatures/naf2008/naf2008.htm>

Having in mind that the main objective is to have a unique code identifier for a Producer, as a legal person or as a natural person, it is proposed to have the National VAT Number as a mandatory unique identifier for a Producer-Legal person, with European tax number and National Registration Number as a voluntary information.

#### a) Producer- Legal person/ National Identification Code

1. National VAT Number (M)
2. European tax number (V)
3. National Registration Number (V)

#### b) Producer- Natural person/National Identification Code

Considering that a Producer-Natural person will not have the VAT number, in some countries (e.g. Germany, Croatia) they have obligation to be register in the national chamber of commerce, or a similar business registry. Thus, it is proposed that National Registration Code is mandatory field for a Producer-Natural person, which would also serve as its unique identifier.

1. National Registration Number (M)<sup>112</sup>
2. European tax number (V)

## **12.5. Section B2: Reporting period**

### **12.5.1. Legislation**

Annex X, section B2 states the following:

*'Reporting period'*

### **12.5.2. Information Elements**

**Table 12-92: Information elements of the B2 section**

<b>IE No:</b>	<b>Information Element (IE) short name</b>	<b>IE indicative description</b>
<b>2.</b>	Reporting period	The period of time the report shall cover. Where applicable and according to the national law: last month, last quarter, last half year or last year.

### **12.5.3. Detailed analysis and mapping**

<sup>112</sup> Noting the comments received that in case of a Producer-Natural person, the VAT number will not be available, but rather the National Registration Number (e.g. from the Chamber of Commerce in Germany, Croatia, etc.), this field is proposed to be mandatory as it would serve as a unique identification code. This number could be for example, registration number from the national Chamber of Commerce (Germany, Croatia, Netherlands, Italy), or Register of businesses, or Registration number issued by the IT application after providing the log-in credentials (Ireland, Portugal, Denmark, etc.).

## 2. Information Element: 'Reporting period'

- Current status on the inclusion of the IE2 'Reporting period' in the national MS reporting templates

**Table 12-93: Status on inclusion 'Reporting period' by MS**

No.	Inclusion in MS Reporting form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	22	AT;BE;CZ; FI; FR; DE; EL;HU;IE; IT; LT; LV;LU; MT; PL; PT;RO; SK;SI; SE; UK; NO
2.	No, not included	2	DK; ES
3.	No info provided	5	BG;HR;CY; EE;NL

- Current Reporting period in different MS

**Table 12-94: Current reporting period of producers as defined by MS**

No.	Reporting period	MS authorities	Details
	Baseline number	29	
1.	Monthly	3	HR <sup>2</sup> ; DE <sup>3</sup> ; IE;
2.	Quarterly	7	AT <sup>1</sup> ; BG; HR <sup>2</sup> ; EE; LV; ES; UK; <sup>5</sup> NO
3.	Every 6 months	1	SI <sup>4</sup> ;
4.	Annually	24	AT <sup>1</sup> ;BE; CY; HR <sup>2</sup> ; CZ; DK; FI; FR;DE <sup>3</sup> ; EL; HU; IT;LT; LT; LU; MT; NL; PL; PT; RO; SK;SI <sup>4</sup> ;SE; UK <sup>5</sup> ;

Note: Several MS have more than one reporting period.

<sup>1</sup>Austria: Quarterly and annually

<sup>2</sup>Croatia: Reporting on monthly, quarterly and annual basis.

<sup>3</sup>Germany: Quarterly and annually

<sup>4</sup>Slovenia: Every 6 months and annually.

<sup>5</sup>UK: Quarterly and annually

- Current state of inclusion of 'start of the reporting period' in the national MS reporting templates

**Table 12-95: Inclusion of 'Start of reporting period' by MS**

No.	Inclusion in MS Reporting form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	6	AT; CZ; DK <sup>1</sup> ; FR; HU <sup>2</sup> ; SE <sup>3</sup>
2.	No, not included	6	DE; EL; LV; LT; UK; NO

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3.	No info provided	17	BE; BG; HR; CY; EE; FI; IE; IT; LU; MT; NL; PL; PT; RO; SK;SI; ES;
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Details:

<sup>1</sup>Denmark: The period of reporting is 1 January-31 March annually

<sup>2</sup>Hungary: Start of reporting period is 1 January

<sup>3</sup>Sweden: Start of reporting period is 1 January

**Table 12-96: Current reporting frequency and period of reporting per national MS legislations**

No.	Country	Reporting frequency		Period of reporting	
		Household Equipment	Other than HE	Household equipment	Other than HE
1.	AT	Quarterly	Annually	No later than 7 weeks after reference quarter	10 April
2.	BE	Annually	Annually	1 July	1 July
3.	BG	Quarterly	Quarterly	20 days after reference quarter	20 days after reference quarter
4.	HR	Monthly (to the Fund) & Annually to the Environment Agency	Monthly (to the Fund) & Annually to the Environment Agency	By 5 <sup>th</sup> day of the following month; By 31 <sup>st</sup> March for previous year	By 5 <sup>th</sup> day of the following month; By 31 <sup>st</sup> March for previous year
5.	CY	Annually	Annually	End of March	End of March
6.	CZ	Annually	Annually	By 31 January	By 31 March
7.	DK	Annually	Annually	1 January-31 March	1 January-31 March
8.	EE	Quarterly	Quarterly	By 15 <sup>th</sup> of the following month	By 15 <sup>th</sup> of the following month
9.	FI	Annually	Annually	By 31 January	By 31 January
10.	FR	Annually	Annually	1 February-31 March	1 February-31 March
11.	DE	Monthly	Annually	15 <sup>th</sup> of the following month	30 <sup>th</sup> April
12.	EL	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
13.	HU	Annually	Annually	By 20 <sup>th</sup> February	By 20 <sup>th</sup> February
14.	IE	Monthly	Monthly	By 19 <sup>th</sup> of each month	By 19 <sup>th</sup> of each month
15.	IT	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January

No.	Country	Reporting frequency		Period of reporting	
		Household Equipment	Other than HE	Household Equipment	Other than HE
16.	LV	Quarterly	Quarterly	By 15 <sup>th</sup> of the following month	By 15 <sup>th</sup> of the following month
17.	LT	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
18.	LU	Annually	By 30 <sup>th</sup> April	By 30 <sup>th</sup> April	Annually
19.	MT	Annually	Annually	By 31 <sup>st</sup> March	By 31 <sup>st</sup> March
20.	NL	Annually	Annually	By 1 <sup>st</sup> May	By 1 <sup>st</sup> May
21.	PL	Annually	Annually	By 15 <sup>th</sup> March	By 15 <sup>th</sup> March
22.	PT	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
23.	RO	Annually	Annually	By 30 <sup>th</sup> April	By 30 <sup>th</sup> April
24.	SK	Annually	Annually	By 31 <sup>st</sup> January	By 31 <sup>st</sup> January
25.	SI	Every 6 months	Every 6 months	By 31 <sup>st</sup> March	By 31 <sup>st</sup> March
26.	ES	Quarterly	Quarterly	35 days following the quarter	35 days following the quarter
27.	SE	Annually	Annually	1 <sup>st</sup> January-31March	1 <sup>st</sup> January-31March
28.	UK	Quarterly	Quarterly	30 <sup>th</sup> April (Q1); 31 <sup>st</sup> July (Q2); 31 <sup>st</sup> October (Q3); 31 <sup>st</sup> January (Q4)	30 <sup>th</sup> April (Q1); 31 <sup>st</sup> July (Q2); 31 <sup>st</sup> October (Q3); 31 <sup>st</sup> January (Q4)
29.	NO	Quarterly	Quarterly	Not applicable	Not applicable

- Additional fields included to the IE2 'Reporting period' per country

No additional fields are included.

#### **12.5.4. Initial proposal for harmonised reporting frequency and period**

In the context of this study it is proposed to use Reporting frequency- how often EEE producer have to report to the national register and reporting period- indicating time period (deadlines) by which producers have to send the report.

Reporting frequency proposed is on Quarterly for household equipment and on Annual basis for other than household equipment.

The period of reporting for Quarterly report is proposed 15<sup>th</sup> of the month following the reference quarter.

The period of reporting for annual reporting is proposed 1 January-31 March of the following year.

#### **12.5.5. Final proposal for harmonised reporting frequency and period**

The vast diversity of reporting frequency and different periods introduced by Member States is a burden to the industry and producers that operate in several MS. As illustrated by one of the producers who oversees reporting for 13 MS, where together with legislation for batteries and packaging, it is necessary to prepare 42 different reports, in different periods and with different deadlines. Thus, harmonisation and alignment between the MS with regard to the reporting frequency and deadline for providing the reports would reduce the burden currently experienced by the industry.

MS organise and implement the reporting process of EEE producers to the national register differently, resulting in a need for having the information more (monthly or quarterly basis) or less frequently (annually). With regard to the reporting process, four cases are identified:

**First**, where producers report directly to the National Register. Currently implemented in 7 MS: Austria, Germany, Portugal, Ireland, Italy, Malta and Slovakia.

**Second**, where producer report to the selected Compliance scheme, who then report to the National Register. Currently implemented in 14 MS: Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Greece, Lithuania, Luxembourg, Netherlands, Spain and UK.

**Third**, producers can either report directly to the National Register or via its selected Compliance scheme. Currently implemented in 7 MS: France, Hungary, Latvia, Poland, Romania, Slovenia and Sweden.

**Fourth**, reporting data is automatically transferred to the national register from IT systems of the customs and compliance schemes. This is current practice of Norway.

In this context it is proposed a common, mandatory reporting frequency on **Quarterly** basis for *all EEE producers* to the national register to be provided **by 30<sup>th</sup> of the month** following the respective quarter.

## 12.6. Section B3: Category of EEE set out in Annex I or III

### 12.6.1. Legislation

Annex X, section B3 states the following:

*"Category of EEE set out in Annex I or Annex III, as appropriate"*

### 12.6.2. Information Elements

**Table 12-97: Information elements of the B3 section**

<b>IE No:</b>	<b>Information Element (IE) short name</b>	<b>IE indicative description</b>
<b>3.</b>	Categories of EEE covered by this Directive during the transitional period from 13 August 2012 to 14 August 2018	List of categories as defined in Annex I of the WEEE directive
	Large household applications	
	Small household applications	
	IT and telecommunications equipment	
	Consumer equipment	
	Lighting equipment	
	Electrical and electronic tools	
	Toys, leisure and sports equipment	
	Medical devices	
	Monitoring and control instruments	
	Automatic dispenses	
<b>4.</b>	Categories of EEE covered by this Directive during the transition period from 15 August 2018	List of categories as defined in Annex III of the WEEE directive
	Temperature exchange equipment	
	Screens, monitors	
	Lamps	
	Large equipment	
	Small equipment	
	Small IT and telecommunication equipment	

### 12.6.3. Detailed analysis and mapping



### **3. Information Element: 'Categories of EEE covered by this Directive during the transitional period from 13 August 2012 to 14 August 2018.'**

- Current status on the inclusion of the IE3 'Categories of EEE during period 2012-2018' in the national MS Reporting forms

**Table 12-98: Status on inclusion of Annex I EEE categories by MS**

No.	EEE Categories 2012-2018	Yes, included	No, not include	Additional fields added	No info received
1.	Large household applications	BE; BG; HR; CZ;DK <sup>1</sup> ;EE; FI; FR; DE; EL; HU; IE; IT <sup>2</sup> ; LV; LT; LU <sup>3</sup> ; MT; NL PL;PT; RO; SK <sup>4</sup> ; SI; ES; SE; UK;	AT; NO <sup>5</sup>	EE; EL; LV; LT; RO; SI	CY; NL
2.	Small household applications	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT <sup>1</sup> ; LV; LT; LU; MT; NL PL;PT; RO; SK <sup>2</sup> ; SI; ES <sup>3</sup> ; SE; UK;	AT; NO	LT; RO	CY; NL
3.	IT and telecommunications equipment	BE; BG; HR; CZ;DK;EE; FI; FR; DE; EL; HU; IE; IT; LV; LT; LU; MT; NL PL;PT; RO; SK; SI; ES; SE; UK; (26)	AT; NO	EL; LV; LT; RO	CY; NL
4.	Consumer equipment	26 MS as above	AT; NO	DK; FR; FI; EL; HU; LV; LT;RO	CY; NL
5.	Lighting equipment	26 MS as above	AT; NO	DK; EE;EL; LV; LT;RO;SI	CY; NL
6.	Electrical and electronic tools	26 MS as above	AT; NO	LT;RO	CY; NL
7.	Toys, leisure and sports equipment	26 MS as above	AT; NO	LT; RO	CY; NL
8.	Medical devices	26 MS as above	AT; NO	LT; RO	CY; NL

9.	Monitoring and control instruments	26 MS as above	AT; NO	LT; RO	CY; NL
10.	Automatic dispensers	26 MS as above	AT; NO	LT; RO; UK	CY; NL

**Details:**

<sup>1</sup>Denmark: The categories that were given during registration is automatically given to the producer for reporting. So they are not asked to re-register the categories. They can choose new categories or delete categories. So, the producer goes directly to section "B4: Quantity of EEE placed on the national market by weight"

<sup>2</sup>Italy: List of equipment per each of 10 categories as defined in the Annex II

<sup>3</sup>Luxembourg: Reporting is per sub-category of each of 10 categories. Also, per each category, producer needs to provide information on total equipment: Date, signature and stamp, registration number, category. Cat.1: Large household appliances has 18 subcategories; Cat2: Small household appliances has 12 subcategories; Cat3: IT and telecommunications equipment has 21 subcategories; Cat4: Consumer equipment (8); Cat5: Lighting equipment (6); Cat6: Electrical and electronic tools (8); Cat7: Toys, leisure and sports equipment (6) subcategories; Cat8: Medical devices (with the exception of all implanted and infected products)(10); Cat9: Monitoring and Controlling instruments (5) subcategories and Cat10: Automatic dispensers( 5).

<sup>4</sup>Slovakia: In each category, there are defined some subcategories. For this producer has to report required data.

<sup>5</sup>Norway: Data for 10 categories are derived from CN-numbers (data collected from the customs IT system)

- Additional fields/categories included by some national authorities in addition to the information element 'Categories of EEE during period 2012-2018'

**Table 12-99: Additional information included by MS**

No.	Category EEE 2012-2018	Additional categories included	MS
1.	Large household applications	Refrigerators	EE
		Refrigerators, freezers and other appliances used for refrigeration	EL; LV
		Air conditioner appliances	EL;LV
		Large household appliances (if different from above)	EL
		Food services/hospitality appliances	EL
		Cooling equipment	SI
		Household equipment	LT
		Other than household equipment	LT

		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
2.	Small household applications	Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
3.	IT and telecommunications equipment	Screens	EL; LV
		IT and telecomm. except screens	EL; LV
		Mobile phones	LV
		Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
4.	Consumer equipment	PV panels	DK; FR; HU; UK
		Televisions	EL; LV
		Consumer equipment (if different)	EL;LV
		Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
5.	Lighting equipment	Lamps	DK; EL
		Luminaires	DK;EL

		Gas lamps	EE
		Gas discharge lamps	SI
		Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
6.	Electrical and electronic tools	Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
7.	Toys, leisure and sports equipment	Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
8.	Medical devices	Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
9.	Monitoring and control instruments	Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT

		Produced in the country	RO
		Imported equipment	RO
10.	Automatic dispensers	Household equipment	LT
		Other than household equipment	LT
		Bank guarantee	LT
		Contract	LT
		Declaration	LT
		Produced in the country	RO
		Imported equipment	RO
		Display equipment	UK
		Cooling appliances containing refrigerant	
		Gas discharge lamps and LED Light source	

#### **4. Information Element: 'Categories of EEE from 15 August 2018'**

- Current status on the inclusion of the IE4 'Categories of EEE from 15 August 2018' in the national MS Reporting forms

**Table 12-100: Status on inclusion of Annex III EEE Categories by MS**

No.	EEE Categories after 15 August 2018	Yes, included	No, not include	No info received
1.	Temperature exchange equipment	AT; BE; HR;CZ; EE; HU <sup>2</sup> ;LT; PT <sup>3</sup> ; SK <sup>4</sup> ; ES (10)	DK <sup>1</sup> ; FI; FR; DE; EL; IE; IT; LV; LU; MT; PL; RO; SI; SE; UK; NO (16)	BG; CY NL;
2.	Screens, monitors	AT; BE; HR;CZ; EE; HU <sup>2</sup> ;LT; PT <sup>3</sup> ; SK <sup>4</sup> ; ES (10)	DK <sup>1</sup> ; FI; FR; DE; EL; IE; IT; LV; LU; MT; PL; RO; SI; SE; UK; NO (16)	BG; CY NL;
3.	Lamps	As above	As above	BG; CY NL;
4.	Large equipment	As above	As above	BG; CY NL;
5.	Small equipment	As above	As above	BG; CY; NL
6.	Small IT and telecommunications equipment	BE; HR;CZ; EE; HU <sup>2</sup> ;LT; PT <sup>3</sup> ; SK <sup>4</sup> ; ES (9)	AT; DK; FI; FR; DE; EL; IE; IT; LV; LU; MT; NL; PL; RO; ES; SE; UK; NO (17)	BG; CY NL;

Details:

<sup>1</sup>Denmark: It will come in 2018

<sup>2</sup>Hungary: It will be implemented from 2 January 2018

<sup>3</sup>Portugal: These categories are planned in the new WEEE legislation

<sup>4</sup>Slovakia: In each category there are defined some subcategories. For this producer has to report required data.

- Additional fields included to the IE4 'Categories of EEE from 15 August 2018'

Lithuania in its national reporting format ask for the following information for each of 6 EEE categories:

- Household equipment
- Other than household equipment
- Bank guarantee
- Contract
- Declaration

#### **12.6.4. Initial proposal for harmonised data structure and format**

It is proposed that indication of relevant 10 categories of EEE placed on the market is mandatory for EEE producers during the transition period until 15 August 2018

It is proposed that reporting is for each 6 categories of EEE placed on the market as defined in the Annex III to the Directive and for corresponding sub-categories as defined in the Annex IV to the Directive, after the transition period.

#### **12.6.5. Final proposal for harmonised data structure and format**

##### **1. EEE Categories as per Annex I or Annex III as appropriate (M)**

- 1.1. Annex I- 10 categories of EEE during the transition period, i.e. until 14 August 2018 (M)
- 1.2. Annex III-6 categories of EEE during the transition period, i.e. from 15 August 2018 (M)

##### **2. EEE Sub-categories (V)**

A number of sub-categories have been already introduced by the majority of Member States as per national legislations, with significant diversity with regard to the number of the sub-categories (i.e. from fully transposed Annex II and Annex IV list of equipment to the countries with few additional categories).

Industry representatives request more harmonisation among the MS with regard to the EEE products categorisation. For example<sup>113</sup>, due to variability among MS, the very same product may be placed into at least three different categories. This forces the producers to collect all the information for each piece of equipment and to develop three different methods of reporting sales quantities rather than just one.

<sup>113</sup> Test and Measurement Coalition- member companies

Having that in mind, an introduction of EEE sub-categories at a voluntary level is an attempt to add a 'common layer' among the vast number of the existing sub-categories introduced in the MS.

**The first proposal** being introduction of a common set of sub-categories to the Annex I categories 1, 3, 4 and 5 as these have been introduced already in some MS. Introduction of a common set of sub-categories *would not* prevent MS to establish further sub-categories as necessary. However, it means that MS need to introduce the defined 'layer' of sub-categories as the common denominator among all MS.

MS representatives expressed their concerns with the proposed introduction of a common set of sub-categories before 2018, and its impact on the existing sub-categories system as per national legislation. More specifically, it was highlighted the necessity for MS to establish further sub-categories as necessary (e.g. Germany, Ireland).

For example, in Ireland due to existence of the visible Environmental Management Cost (vEMC) there are 5 sub-categories introduced under the category 1- Large household appliances. With introduction of the proposed two sub-categories, 1.a. large household appliances used for refrigeration and 1.b. large household appliances not used for refrigeration, Ireland would need to re-group its existing 5 sub-categories under these proposed ones.

In this example, the proposed sub-categories system as applied to the existing system in Ireland would be the following:

Category 1: Large household appliances

- a.** Large cooling appliances, refrigerators, freezers and other large appliances used for refrigeration (proposed common sub-category)
  - 1.1. Refrigerators (existing Ireland sub-category)
  - 1.2. Refrigerators (existing Ireland sub-category)
  - 1.2a Refrigerators (existing Ireland sub-category)
- b.** Large household appliances without refrigeration equipment (proposed common sub-category)
  - 1.3. Large appliances (existing Ireland sub-category)
  - 1.4. Medium appliances (existing Ireland sub-category)
  - 1.5. Small appliances (existing Ireland sub-category)

Proposal 1: Definition of a common set of sub-categories for Annex I Categories 1, 3, 4 and 5 as these have been already introduced in some national MS.

- 1. Large household equipment
  - a.** Large cooling appliances, refrigerators, freezers and other large appliances used for refrigeration
  - b.** Large household appliances without refrigeration equipment
- 2. Small household appliances

3. IT and telecommunication equipment
  - a. IT and telecommunication equipment with monitors and CRT<sup>114</sup> screens
  - b. IT and telecommunication equipment without monitors and CRT<sup>115</sup> screens
4. Consumer equipment and PV
  - a. PV panels
5. Lighting equipment
  - a. Lamps
  - b. Luminaries
6. Electrical and electronic tools
7. Toys, leisure and sports equipment
8. Medical devices
9. Monitoring and control instruments
10. Automatic dispensers

**The second proposal** is introduction of the UNU keys as a possible EU-level e-waste categorisation system instead of the existing Annex I and Annex III.

The UNU keys is a classification that establish relationships between the existing categorisation, and also with the classifications applied in the customs authorities (CN codes<sup>116</sup>). Noting the output of the recently published DG ENV Study on WEEE recovery targets, preparation for re-use targets and on the method for calculation of the recovery targets<sup>117</sup>, an introduction of UNU keys would facilitate and harmonise data collection in a structured way, creating a solid system for traceability and target monitoring.

MS representatives expressed strong positions of disagreement (e.g. Germany, Austria, and UK) with regard to this proposal, highlighting that would increase bureaucracy and costs for the authorities and producers. Some MS recognize the importance of the proposal, but also that would have significant impacts that should be further studied (France) or taken into account in case WEEE generated methodology is going to be considered (Spain).

A brief comparison of these two proposals is given below:

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<sup>114</sup> Stands for "Cathode Ray Tube." CRT is the technology used in traditional computer monitors and televisions. Source: <http://techterms.com/definition/crt>

<sup>115</sup> Stands for "Cathode Ray Tube." CRT is the technology used in traditional computer monitors and televisions. Source: <http://techterms.com/definition/crt>

<sup>116</sup> The Combined Nomenclature (CN codes) is comprised of the Harmonized System (HS) nomenclature with further Community subdivisions. The Harmonized system is run by the World Customs Organisation (WCO). [http://ec.europa.eu/taxation\\_customs/customs/customs\\_duties/tariff\\_aspects/combined\\_nomenclature/index\\_en.htm](http://ec.europa.eu/taxation_customs/customs/customs_duties/tariff_aspects/combined_nomenclature/index_en.htm)

<sup>117</sup> [http://ec.europa.eu/environment/waste/weee/pdf/16.%20Final%20report\\_approved.pdf](http://ec.europa.eu/environment/waste/weee/pdf/16.%20Final%20report_approved.pdf)



**Table 12-101: Pros and Cons of the proposals for EEE sub-category**

	<b>Pro's</b>	<b>Con's</b>
<u>Proposal 1:</u> Common set of sub-categories for Annex I Categories 1, 3, 4 and 5	<ul style="list-style-type: none"> <li>-already introduced in some MS</li> <li>-creates a 'middle ground' among MS with few to 100+ sub-categories</li> </ul>	<ul style="list-style-type: none"> <li>-in use until 2018 when need to change to 6 categories system</li> <li>-not a long term solution with regard to monitoring, traceability and exchange of information</li> </ul>
<u>Proposal 2:</u> UNU Keys as sub-categories for registration (and reporting)	<ul style="list-style-type: none"> <li>-robust system with one-to-many relation to Annex I and Annex III categories; also link to HS codes</li> <li>-increased traceability and monitoring of POM and WEEE generated.</li> <li>-facilitates info exchange</li> </ul>	<ul style="list-style-type: none"> <li>-requires a set of adjustments among players in the supply chain (producers, compliance scheme, authorities, etc.)</li> </ul>

## 12.7. Section B4: Quantities of EEE placed on the national market, by weight

### 12.7.1. Legislation

Annex X, section B4 states the following:

*"Quantities of EEE placed on the national market, by weight".*

*This information must be given by category of EEE in accordance with Annex I or Annex III as appropriate.*

### 12.7.2. Information Elements of the section B4

**Table 12-102: Information elements of the B4 section**

<b>No:</b>	<b>Information Element (IE) short name</b>	<b>IE indicative description</b>
<b>5.</b>	Quantities of EEE placed on the national market, by weight. Information per categories of EEE as defined in Annex I or Annex III as appropriate.	Quantities of EEE placed on the national market, by weight expressed in kilograms. List of categories as defined in Annex I of the WEEE directive during the transition period and as defined in Annex III after the transition period.

### 12.7.3. Detailed analysis and mapping

#### **5. Information Element: 'Quantities of EEE placed on the national market, per weight.'**

- Current status on inclusion of the field 'EEE put on the national market' in the MS national reporting templates

**Table 12-103: Inclusion of the EEE Put on the Market in MS templates**

No.	Inclusion in MS Reporting form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	25	AT; BE; BG;HR; DK; EE; FI;FR; DE; EL;HU; IE; IT; LT; LU; MT, PL; PT; RO;SK;SI; ES; SE; UK; NO
2.	No, not included	2	CZ; LV;
3.	No info provided	2	CY; NL;

- Current status on inclusion of the fields 'Household equipment' and 'Other than household equipment' per each EEE category in the MS Reporting forms

**Table 12-104: Inclusion of EEE POM per household and other than household equipment in MS templates**

No.	Inclusion in MS Reporting form	Member States	
		Household Equipment	Other than HE
1.	Yes, included	AT; BE; BG;HR; DK; EE; FI;FR; DE; HU; IE; IT; LT; PL; SK;SI; ES; SE; UK; NO (20)	AT; BE; BG;HR; DK; EE; FI;FR; DE; HU; IE; IT; LT; PL; SK;SI; ES; SE; UK; (19)
2.	No, not included	CZ; LV; EL;LU; MT; PT; RO; (7)	CZ; LV; EL;LU; MT; PT; RO; NO (8)
3.	No info provided	CY; NL; (2)	CY; NL; (2)

### 12.7.4. Initial proposal for harmonised data structure and format

Noting that 25 MS already request reporting on quantities of EEE in their national reporting forms, where 20 MS request this information per type of EEE and at the category level the following information should be included in the reporting:

- Quantities of EEE placed on the national market, expressed in kilograms, per type of EEE and at the category and sub-category level.

### 12.7.5. Final proposal for harmonised data structure and format

Producers should report the quantities by weight (in kilograms) and information will be provided at the category level and per type of EEE.

For each of 10 EEE categories during the transition period (until 2018) or 6 categories of EEE from 15 August 2015 the following information needs to be provided:

1. Household EEE (M)
2. Other than household EEE (M)
3. Weight in kilograms (kg) (M)

## 12.8. Section B5: Quantity, by weight, of Waste of EEE

### 12.8.1. Legislation

Annex X, section B5 states the following:

*"Quantity, by weight, of waste EEE separately collected, recycled (including prepared for re-use), recovered and disposed of within the Member State or shipped within or outside the Union"*

### 12.8.2. Information Elements

**Table 12-105: Information elements of the B5 section**

IE No:	Information Element (IE) short name	IE indicative description
<b>6.</b>	WEEE separately collected	
6.1.	Private household equipment	
6.2.	Other than private household equipment	
<b>7.</b>	WEEE recycled, recovered and disposed in MS	
	WEEE Recycled	
	WEEE Recovered	
	WEEE disposed in MS	
<b>8.</b>	WEEE shipped	
	Shipped inside EU	
	Shipped outside EU	

### 12.8.3. Detailed analysis and mapping

#### **6. Information Element: 'WEEE separately collected'**

- Current status on the inclusion of the IE6 'WEEE separately collected' in the MS Reporting forms.

**Table 12-106: Inclusion of information on WEEE separately collected in MS authority reporting templates**

No.	Inclusion in MS Reporting form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	20	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; LV; LU; MT; RO;SK; SE; UK;
2.	No, not included	6	LT; EL; PL; ES <sup>2</sup> ; NO <sup>3</sup> ; PT <sup>4</sup>
3.	Other	1	SI <sup>1</sup> ;
4.	No info provided	2	CY; NL;

Details:

<sup>1</sup>Slovenia: This information on collected, recycled, recovered and disposed WEEE is not part of the registration form but it is in the Report on WEEE management that is prepared by the Compliance schemas on behalf of their producers. (So producer does not submit this information directly to the authority).

<sup>2</sup>Spain: The Ministry of Industry is only responsible for EEE producer register. That means new products. The ministry of industry is *not responsible* of the recycling, waste or residues data, it is a competency of Ministry of Agriculture, Food and Environment that compiles the environmental information and send it to the European Commission as per article 16.4 and 16.5

<sup>3</sup>Norway: This information is reported from the Compliance systems (PRO) on aggregate scale, not on each producer.

<sup>4</sup>Portugal: This information is foreseen in the national legislation, but not included in the national reporting forms because it is data reported by the compliance systems to the national authority on aggregate scale, not by each producer.

- Additional fields included to the IE6 'WEEE separately collected' in the MS Reporting forms  
No additional fields are included.

**6.1. Information Element: 'Private household equipment'**

- Current status on the inclusion of the sub-element 'Private household equipment' in the MS Reporting forms

**Table 12-107: Inclusion of the section of 'Private household equipment' in the national MS Reporting forms**

No.	Inclusion in MS Reporting form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	19	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; LV; MT; RO;SK; SE; UK;

2.	No, not included	7	EL; LT; LU; PL; ES; PT <sup>1</sup> ; NO
3.	Additional fields included	2	DK; RO
4.	Other	1	SI;
5.	No info provided	2	CY; NL;

Details:

<sup>1</sup> Portugal: This information is foreseen in the national legislation, but not included in the national reporting forms because it is data reported by the collective schemes to the national authority on aggregate scale, not by each producer.

- Additional fields included per country

**Table 12-108: Additional fields included**

No.	Additional fields	MS
1.	Collected from municipalities	DK
2.	Collected from other places by collective schemes	
3.	Collected from other places by the producer	
4.	At collection points	RO
5.	By retailers	
6.	By other means	

**6.2. Information Element: 'Other than private household equipment'**

- Current status on the inclusion of the sub-element 'Other than private household equipment' in the MS Reporting forms

**Table 12-109: Inclusion of the section 'Other than private household equipment' in the national MS Reporting forms**

No.	Inclusion in MS Reporting form	MS authorities	Details
	Baseline number	29	
1.	Yes, included	21	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; LV; MT; RO;SK; SE; UK;
2.	No, not included	7	EL; LT; LU; PL; ES; PT; NO
3.	Additional fields included	3	DK; RO; FI
4.	Other	1	SI;
5.	No info provided	2	CY; NL;

- Additional fields included per country

**Table 12-110: Additional fields included by MS**

No.	Additional fields	MS
1.	Collected from municipalities	DK
2.	Collected from other places by EPR compliance systems	
3.	Collected from other places by the producer	
4.	At collection points	RO
5.	By retailers	
6.	By other means	
7.	Storage of WEEE	FI

**7. Information Element: 'WEEE Recycled, recovered and disposed'**

- Current status on the inclusion of the IE7 'WEEE recycled, recovered and disposed'

**Table 12-111: Inclusion of the section in national MS Reporting forms**

No.	Inclusion in MS Reporting form	Yes, it is included	No, not included	No info provided
1.	WEEE Recycled	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; LV; MT; SK; SE; UK; (18)	EL; LT; LU; PL; RO; ES; PT. NO (8)	CY; NL;SI (3)
2.	WEEE Recovered	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; SK; SE; UK; (16)	EL; LV; LT; LU; MT; PL;RO; ES; PT; NO (10)	CY; NL;SI (3)
3.	WEEE disposed in MS	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; LV; MT; SK; SE; (17)	EL; LT; LU; PL;RO; ES; PT; NO; UK (9)	CY; NL;SI (3)

- Additional fields included to the IE7'WEEE Recycled, recovered and disposed

No additional fields are included.

**8. Information Element: 'WEEE Shipped'**

- Current status on the inclusion of the IE8 'WEEE shipped'

**Table 12-112: Inclusion of the section in national MS Reporting forms**

No.	Inclusion in MS Reporting form	Yes, it is included	No, not included	No info provided
1.	WEEE Shipped inside EU	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE; IE; IT; LV; MT; SK; SE; (16)	EL; HU; LT; LU; PL;RO; ES; PT; UK; NO (10)	CY; NL;SI (3)
2.	WEEE Shipped outside EU	AT; BE; BG;HR; CZ; DK; EE; FI;FR; DE;HU; IE; IT; SK; (14)	EL; LV; LT; LU; MT; PL;RO; ES; PT; SE; UK NO (11)	CY; NL;SI (3)

- Additional fields included to the IE8 'WEEE shipped' in the national MS reporting forms

No additional fields included under the 'WEEE shipped' section

#### 12.8.4. Additional fields included in the national MS reporting forms per country

**Table 12-113: Additional fields included by MS**

No.	Additional fields	MS
1.	WEEE Prepared for reuse as a whole	FR; RO
2.	Re-use of whole appliances (expressed in % and tonnes)	RO
3.	Re-use of components	FR; RO
4.	Recycling of materials	FR; RO
5.	Incineration with energy recovery	FR
6.	Elimination without recovery	FR
7.	WEEE treated inside EU	HU; RO
8.	Treated inside the country	RO
9.	Treated in other Member States	RO
10.	WEEE treated outside EU	HU; RO
11.	Equipment reused, recycled or other forms of recovery (kg)	LU
12.	Indication of the final or intermediate treatment facility	LU
13.	Quantities of exported waste (kg)	LU
14.	Effective rate of recovery	LU
15.	Categories-recovery (in % and tonnes)	RO

16.	<i>Information on the EEE Waste Management During the reporting period</i>	LT
17.	The document issuing the company's legal entity code	
18.	The document issuing the company's legal form and name	
19.	Document Number	
20.	Document the date of issue	
21.	Use and/ or exported/removed using the waste	
22.	Declaration (certifying the information provided is true)	

### 12.8.5. Initial proposal for harmonised data structure and format

It is proposed that the following information elements/entities together with indicated attributes will be reported at the category level of equipment and type of equipment per category. Quantities of WG will be expressed in kilograms. All information will be mandatory.

1. WEEE separately collected
  - 1.1. Collected from municipalities
  - 1.2. Collected from other places by collective scheme
  - 1.3. Collected from other places by the producer
2. WEEE recycled, recovered and disposed in MS
  - 2.1. WEEE recycled
  - 2.2. WEEE recovered
  - 2.3. WEEE disposed
3. WEEE shipped
  - 3.1. WEEE shipped inside in the Union
  - 3.2. WEEE shipped outside the EU
4. WEEE prepared for reuse as a whole
  - 4.1. Re-use of components
  - 4.2. Categories recovery

### 12.8.6. Final proposal for harmonised data structure and format

The information on quantities of WEEE generated, expressed in kilograms, will be reported to the MS responsible authority (national register of appropriate) by the EEE Producers who selected the individual system for meeting its EPR obligations.

If the producer selected the collective system, this information will be provided by the producer and/or the EPR compliance system the producer is member of.



The following information elements/entities will be mandatory for reporting at the EEE category level and quantity expressed in kilograms.

1. WEEE separately collected (M)
  - a. Household equipment (M)
  - b. Other than household equipment (M)
2. WEEE Recycled, Recovered and Disposed (M)
  - a. WEEE Recycled (M)
  - b. WEEE Recovered (M)
  - c. WEEE Disposed (M)
3. WEEE Shipped (M)
  - a. WEEE shipped within the EU (M)
  - b. WEEE shipped outside the EU (M)

## 12.9. Harmonised structure and format for reporting of EEE producers

This section presents the proposed harmonised structure and format for *reporting* of EEE producers. The data fields indicated with '(M)' are mandatory fields to be included by the national authorities in their national templates and corresponding registry systems. On the other side, the data fields indicated with '(V)' are fields that can be included by the national authorities on the voluntary basis.

This proposed harmonised structure and format for registration will serve as a basis for the implementing act to be developed by the Commission under the Article 16(3) of the Directive.

### B1: National Identification Code of the producer

1. National VAT number (M)
2. European VAT number (V)
3. National Registration Number (V), for Producer as a Legal person
4. National Registration Number (M) for Producer as a Natural person.

### B2: Reporting period

Proposed reporting frequency of EEE Producers to the National register is on **Quarterly** basis (M) for household and other than household equipment.

The period of reporting proposed is **30<sup>th</sup> of the month** following the respective quarter.

### B3: Category of EEE set out in Annex I or Annex III as appropriate

1. Annex I: 10 categories of EEE during the transition period, i.e. until 14 August 2018 (M)
2. Annex III: 6 categories after the transition period, i.e. from 15 August 2018 (M)
3. EEE Sub-categories (V)

### B4: Quantity of EEE laced on the national market (PoM), by weight

For each of 10 EEE categories during the transition period (until 2018) or 6 categories of EEE from 15 August 2018 it should be provided the following information:

1. Household EEE (M)
2. Other than household EEE (M)
3. Weight in kilograms (kg) (M)

**B5: Quantity, by weight, of Waste of EEE (WEEE), separately collected, recycled (including prepared for re-use), recovered and disposed of within the Member State of shipped within or outside the Union.**

The following information elements/entities will be mandatory for reporting at the EEE category level and quantities expressed in kilograms.

4. WEEE separately collected (M)
  - a. Household equipment
  - b. Other than household equipment
5. WEEE Recycled, Recovered and Disposed (M)
  - a. WEEE Recycled (M)
  - b. WEEE Recovered (M)
  - c. WEEE Disposed (M)
6. WEEE Shipped (M)
  - a. WEEE shipped within the Union
  - b. WEEE shipped outside the EU