

DIGITALEUROPE's Guidance on Dimensions Data (WEEE2 Scope)

Brussels, 5 October 2017

On 15 August 2018, the scope of Directive 2012/19/EU WEEE is widened to include all electrical and electronic equipment with some given exemptions¹.

Product categories will be limited to 6 with more products being included ('open scope'). What is more, for reporting purposes, producers will have to categorize their products into the 6 new categories according to product dimensions.

Discussions are ongoing between the European Commission, national producer registries and Ministries in an effort to determine how best to implement categorization based on dimensions.

While we highly appreciate this work, we recognize the complexity to find a common approach. With this paper, we would like to offer guidance and provide our recommendations on how to implement the new WEEE2 scope provisions in a harmonized way.

1. Dimensions Data

The new WEEE2 categorization (for reporting purposes) requires product classification based on product dimensions. In line with point 5.2 of the WEEE2 FAQ Guidance document², we recommend the following approach:

- Product dimensions include only the main product(s)/unit(s) itself
- If a product contains several units (e.g. speaker set or sound bar with subwoofer), the dimensions of the longest unit determines the product category
- Electrical or non-electrical accessories should not be included with the product measurement. Product's dimensions should therefore be measured by drawing a box around the naked product³. Measuring the naked product without any accessories that can be removed is the only option that is clear and never leads to discussions.

1 <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012L0019&from=EN>

2 <http://ec.europa.eu/environment/waste/weee/pdf/faq.pdf>

3 This is similar to the industry GSDN standard for packaging measurements
https://www.gs1.org/docs/gdsn/3.1/GSDN_Package_Measurement_Rules.pdf

- Electronic accessories sold with very small EEE should not be reported separately. That would multiply the cost for producers reporting and paying per item of EEE POM. (e.g. a cell phone, its charger and the earphones are currently accounted and reported as one item. Reporting them separately would triple the cost for producers paying per item)
- Electronic accessories (in WEEE2 scope) such as remote controls, cables etc. sold separately, should be measured by drawing a box around the product. I.e., these products shall be measured the same way as they are presented in their sales packaging

We recommend measuring the naked product without any removable accessories. This is the only option that is clear and never leads to discussion. Please refer to the Annex (product guidance) for further examples.

2. Timeline

While the new scope takes effect from August 15th 2018, we propose implementing the categorization based on dimensions as of January 1st 2019. Ideally, reporting obligations should be streamlined with the compliance year (i.e. calendar year). Indeed, manufacturers report and pay invoices to the compliance schemes on a monthly or quarterly basis. Changing categorization during a compliance year would therefore not be ideal.

We recommend starting reporting using dimensions from January 2019 onwards across all Member States.

Annex

WEEE2 Scope	Product examples	Category	Dimensions	Notes
1. Temperature exchange equipment	N/A			
2. Screens, monitors, and equipment containing screens having a surface greater than 100 cm ²		TV	- Dimension of TV without stand (WxH)	W: width H: height If W*H >100cm ² = cat. 2
		Tablet	(WxH)	If W*H =< 100cm ² not cat. 2
3. Lamps	N/A			
4. Large equipment (any external dimension more than 50 cm)		Home Theater	- Dimension main (longest) unit (WxHxD)	W: width H: height D: Depth
		DVD player	- Dimensions (WxHxD)	If W, H or D >50cm = cat. 4
		Speaker	- Dimensions (LxWxH)	if W, H or D =<50cm = cat. 5

		Professional camera	- Dimensions (WxHxD) (excluding protrusions)	
		Sound bar	- Dimension main (longest) unit (WxHxD)	
		Projector	- Dimensions (WxHxD) (excluding protrusions)	
5. Small equipment (no external dimension more than 50 cm)		Surveillance camera	- Dimension (WxHxD)	
		Headphones	Draw a box around the equipment and measure its dimensions (i.e. packaging dimensions)	Approach in line with point 5.2 of the current WEEE2 FAQ
		Radio	- Dimensions (WxHxD)	
6. Small IT and telecommunication equipment (no external dimension more than 50 cm)		Mobile phone	- Dimensions (WxH)	if W, H or D >50cm= cat. 4 'large equipment' if W, H or D =<50cm = cat. 6

--

For more information please contact:
Valentina Bolognesi, DIGITALEUROPE's Senior Policy Manager
+32 478 57 50 82 valentina.bolognesi@digitaleurope.org

ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies.

DIGITALEUROPE's members include in total 25,000 ICT Companies in Europe represented by 61 corporate members and 37 national trade associations from across Europe. Our website provides further information on our recent news and activities: <http://www.digitaleurope.org>

DIGITALEUROPE MEMBERSHIP

Corporate Members

Adobe, Airbus, Amazon, AMD, Apple, BlackBerry, Bose, Brother, CA Technologies, Canon, Cisco, Dell, Dropbox, Epson, Ericsson, Fujitsu, Google, Hewlett Packard Enterprise, Hitachi, HP Inc., Huawei, IBM, Intel, JVC Kenwood Group, Konica Minolta, Kyocera, Lenovo, Lexmark, LG Electronics, Loewe, Microsoft, Mitsubishi Electric Europe, Motorola Solutions, MSD Europe Inc., NEC, Nokia, Nvidia Ltd., Océ, Oki, Oracle, Panasonic Europe, Philips, Pioneer, Qualcomm, Ricoh Europe PLC, Samsung, SAP, SAS, Schneider Electric, Sharp Electronics, Siemens, Sony, Swatch Group, Tata Consultancy Services, Technicolor, Texas Instruments, Toshiba, TP Vision, VMware, Western Digital, Xerox, Zebra Technologies.

National Trade Associations

Austria: IOÖ	Germany: BITKOM, ZVEI	Slovakia: ITAS
Belarus: INFOPARK	Greece: SEPE	Slovenia: GZS
Belgium: AGORIA	Hungary: IVSZ	Spain: AMETIC
Bulgaria: BAIT	Ireland: TECHNOLOGY IRELAND	Sweden: Foreningen Teknikföretagen i Sverige, IT&Telekomföretagen
Cyprus: CITEA	Italy: ANITEC	Switzerland: SWICO
Denmark: DI Digital, IT-BRANCHEN	Lithuania: INFOBALT	Turkey: Digital Turkey Platform, ECID
Estonia: ITL	Netherlands: Nederland ICT, FIAR	Ukraine: IT UKRAINE
Finland: TIF	Poland: KIGEIT, PIIT, ZIPSEE	United Kingdom: techUK
France: AFNUM, Force Numérique, Tech in France	Portugal: AGEFE	
	Romania: ANIS, APDETIC	