

1.

WEEE in Germany!

WEEE 德国 !

- Foreign (also from other EU countries) gas discharge lamps producers are often not registered in Germany!
- The reason for such behaviour is lack of information on the necessity of registration and compliance!

- 很多国外 (也包括其他欧盟国家)的气体放电灯泡生产商没有在德国进行登记注册!
- 出现这种情况的原因是缺乏必要的登记注册信息及遵守法律的意识!

Lightcycle Retourlogistik und Service GmbH, a German compliance scheme for lighting equipment, has announced that according to their market analysis foreign (also from other EU countries) gas discharge lamps producers are often not registered in Germany (EUWID 10/2008). The reason for such behaviour is lack of information on the necessity of registration and compliance. Lightcycle is warning that as a consequence fines up to 50.000 EUR or even a ban from the market is possible. The company has started investigation against such free riders reporting them also to the Federal Environmental Agency. As a result two companies selling non registered gas discharge lamps were forced to stop their activities.

The issue of discrimination of small and medium EEE producers in regard to take back obligation being assigned by German Register EAR, as already reported earlier in one of our previous Newsletters, has reached in the meantime German Bundestag (EUWID 10/2008). The FDP, German political party, has forwarded this issue to the German government for evaluation. The FDP suggests to base take back obligations on the real quantities of EEE placed on the market and not on the estimated quantities. Furthermore, it is suggested to introduce a lower limit on EEE amounts which will not be affected by the WEEE regulation.

The German Federal and Municipal Consortium for Waste (Länderarbeitsgemeinschaft Abfall – LAGA) has published a revision of the bulletin on treatment of WEEE (EUWID 10/2008). Changes foreseen try to improve the traceability of the WEEE. It is suggested to forbid reloading the containers with WEEE when transferring them from collection sites to the preliminary treatment facility. The reloading will be allowed only in facilities certified for this purpose. Also sorting of WEEE or removing of WEEE parts will be forbidden during the transport to the preliminary treatment facility. In this way the problem of assigning of WEEE quantities to the waste code of EAR can be solved. The bulletin also foresees some changes in treatment guidelines of refrigeration equipment and CRTs as well as in transport requirements of WEEE. The bulletin has been distributed between affected parties and comments will be possible on 9th April 2008.

On 21st February 2008 the Federal Administrative Court of Germany (Bundesverwaltungsgericht) made a final decision on the "Adidas-Case" in favour of Adidas regarding the question if a sports shoe is a shoe or an EEE (we already informed in previous newsletters). More details on the decision will be available at

the end of March but it is already known that the Federal Administrative Court of Germany argues according to § 2 /1 /1 ElektroG that a sports shoe per definition does not fall within one of the 10 WEEE Categories but is seen as “Clothing”.

Source: KERP-Consulting GmbH
www.kerp-consulting.at

2.

RoHS Review !	
回顾 RoHS !	
<ul style="list-style-type: none">- New hazardous substances in EEE should be directly regulated in REACH instead of being included into RoHS!- Different legal form of REACH Regulation in comparison to RoHS Directive!	<ul style="list-style-type: none">- 电子电气设备中新的有害物质应该受REACH指令管理而不是被列入RoHS指令!- 与RoHS法律指令相比REACH指令的法律形式完全不同!



In its position paper to the RoHS Directive review, Orgalime expressed the opinion that restriction of hazardous substances in electrical and electronic equipment should be in future regulated under REACH regulation on the restriction, evaluation and authorisation of chemicals (EUWID 10/2008). The current review process should prepare this process and concentrate on the harmonised implementation of RoHS in member states as well as to align it with the EuP Directive (Energy using Products). New hazardous substances in EEE should be directly regulated in REACH instead of being included into RoHS. Moreover, new restrictions should be based on the risk approach (hazard and exposure) and not on the hazard approach as in RoHS. Orgalime argues that regulation of hazardous substances in EEE under REACH will solve the problem of harmonisation due to different legal forms of REACH Regulations in comparison to RoHS Directive.

Read full Orgalime Position Paper here:

http://www.orgalime.org/Pdf/PP_Policy_Options_RoHS_Review_Feb08.pdf

Öko-Institut e.V. that is conducting a study of hazardous substances for possible inclusion into the scope of RoHS Directive has published a table of 46 substances of high priority and has invited interested parties to send their comments on the following matters:

- whether there are other substances that should be included to the list of substances
- information on the specific components and concentration ranges of contained substances
- whether risk/exposure assessments are available for the listed substances beyond the EU Risk Assessment Reports
- whether substitutes or alternatives are available for the listed substances and which advantages or disadvantages are connected with these substitutes.

The comments can be sent to hse-rohs@oeko.info till 28 March 2008.

More information is available here: <http://hse-rohs.oeko.info/index.php?id=4>

According to the exemptions to the RoHS Directive it has to be said that currently there are 29 approved ones. In the pipeline are at the moment three additional ones, namely:

Lead in solders for the connection of very thin enamelled wires with a terminal.

Lead and Cadmium as components of the glazes and colour used to glaze or decorate lamp bases, lamp carriers or clocks.

Lead in solders in a third party component of Cortex family equipment

Source: KERP-Consulting GmbH
www.kerp-consulting.at

3.

Green electronics products – a reality?

- Environmental friendliness and Innovation!
- Still none of the products can be called 'green'!



绿色环保的电子产品 – 是真的吗?

- 生态环境的友善和创新!
- 仍然没有一个电子产品可以称作是'绿色环保产品'!

Greenpeace has recently conducted a survey on the environmental friendliness and innovation of Desktop PCs, notebooks, mobile phones and PDA's.

The environmental group assessed electronics products on their use of hazardous chemicals, energy efficiency, the overall product lifecycle (recyclability and upgradeability) as well as their environmental friendliness and innovation.

The Sony Vaio TZ11 laptop, Sony Ericsson T650i mobile phone and Sony Ericsson P1i PDA have been rated highest. However, the report also states that none scored over 5/10, which leaves room for improvement.

Companies were invited to submit a maximum of 3 (per category) of their most environmentally friendly products. The report also states that many companies did either not respond (t.ex. Acer, Apple, Microsoft, Nintendo and Sharp) or did not submit their products on time.

Thirty-seven products were assessed, from fourteen major electronics brands who agreed to provide information for the survey at the end of 2007. Sony Vaio TZ11 notebook, the Sony Ericsson T650i mobile phone and the Sony Ericsson P1i PDA came out top. The best rated desktop came from Dell (Optiplex 755) and HP (dc5750). However, these desktops and other mobile phones, laptops and PDAs could not score above 5/10.

The survey also states that many individual innovations were made regarding toxics reduction, energy efficiency, longer lifecycles and recycling. However, still none of the products can be called 'green'. Key players in the market should work to combine all innovation to produce a true green electronics product, finds the report.

Source: www.evertiq.com