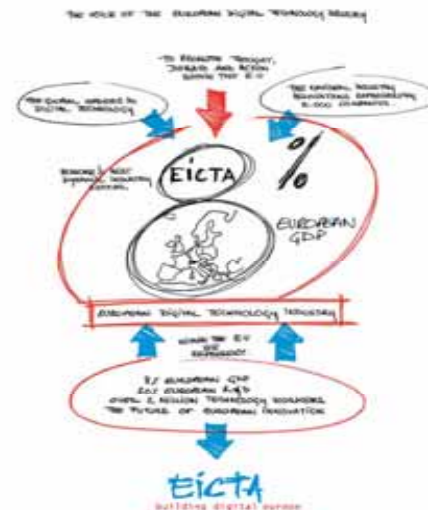


Insead Conference:
Roadmap towards Harmonized Producer
Registers and Information Collection

EICTA's Perspective

TELECOMMUNICATIONS TECHNOLOGY.//.CONSUMER ELECTRONICS.//.INFORMATION TECHNOLOGY

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Harmonization of Producer Registers



Problems resulting from the non-harmonization



Solutions proposed



Mitigate problems



Improve efficiency of control and reporting mechanisms

Problems resulting from a non-harmonization: Registration



Obligation of Registration to legal entity in MS



Technical barrier to trade for EU companies based in other MSs



Identification of Producer (responsible party) for sales through distributors.



Remarking as EEE passes from MS to MS? (against EC Treaty!)



Risk of multiple requirements; I.e. financial guarantees in intra-Community trade.



Problems of proportionality







E.g. Entry barriers to SMEs.

Problems resulting from a non-harmonization: Information Requirements:



Different content

Different criteria; e.g.

-  Identification of Producer
-  Type of Equipment
-  Weight
-  Household or non-household



Calculation of
historical liabilities



Different frequency

Resulting in



Burden to Industry

Difficulties to MSs to meet reporting obligations

Non-harmonization of Registers: Summary of the Problems



Potential barriers to trade



Entry barriers for SMEs



Unnecessary administrative burden



Difficulties to identify responsible party



Quality of the information

Outlining solutions

Quick-wins:



Reduce problems experienced by Producers, and

Improve overall efficiency in

- ➔ Market surveillance and control of free-riders
- ➔ reporting mechanisms

Quick Wins – Registration Process and Requirements



Allow producers established in a MS to Register in any MS Registry



Subject to same obligations



Avoid non-proportional requirements (fees, local bank accounts requiring legal presence, etc.)



Allow distributors to be covered by Registration of a Producer.



Information requirements for Registration



Coordination of Registers (Clearing mechanisms) to



Avoid duplication of requirements as Products move from MS to MS









Registration number?

Quick Wins – Information requirements



Harmonize Content and/or set up common criteria for:

-  Definition of Type of Equipment
-  Household vs. Non-household differentiation.
-  Criteria for weight
-  Consideration for sales to 3rd party MSs
-  Frequency
-  etc.



Maximize alignment with info requirements from MSs to EC

Avoid using strictest system as model.

Potential solutions



Alternatives

- ➔ Pan-EU Register? → Is the solution?
- ➔ WEEE Directive Amendment → timing?
- ➔ EC Guidelines
 - ▶ Adoption by MSs?
- ➔ Non-harmonization



Due to reasons of timing and practicality, EICTA considers that the development by Commission of a set of guidelines by EC that would be followed by MSs would be the best short or mid-term option.

- ➔ Industry could help EC and MSs to develop criteria.

Thank you!

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