

# Position Paper

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## EuropElectro – European Electrical and Electronics Industry Position Paper on Amendments to China WEEE Product Catalogue (exposure draft version)

To Whom it may Concern:

NDRC solicited public comments on Amendments to the China WEEE Product Catalogue (exposure draft version) (hereinafter referred to as 'China WEEE exposure draft version catalogue') from 25 December 2013 to 24 January 2014.

EuropElectro<sup>1</sup> called for our member companies' comments on this. As a representative of the European electrical and electronics industry, we support the establishment of criteria and requirements for collection, recycling and disposal activities in order to facilitate resource utilisation and development of a circular economy as well as protect the environment and human health.

Our industry would like to contribute our experience and industry positions on the amendments to the China WEEE product catalogue and are eager to participate in the next steps. To support this catalogue in being more reasonable and workable, our industry is proposing six positions.

1.

*EuropElectro helps to bring Europe and China closer together in technical legislation, standardisation and certification for electrical and electronic products in order to facilitate trade with these products in both directions.*

*Through our cooperation with ORGALIME, we are the voice of our member companies from all over Europe in China.*



Orgalime - The European Engineering Industries Association, Brussels  
Orgalime - 欧洲工程行业协会, 布鲁塞尔

ZVEI - German Electrical and Electronic Manufacturers' Association, Frankfurt am Main  
ZVEI - 德国电气电子行业协会, 法兰克福

## I. Executive Summary

1. We propose that the regulators collect the results and summarise the experiences and lessons learnt during the implementation of the 1<sup>st</sup> batch China WEEE Catalogue before implementing this amended catalogue.

Based on this information the regulators could improve the fairness of the fund levy and utilisation system. In order to ensure fairness between law-abiding companies and illegal companies, as well as the fairness of the different products listed in the WEEE catalogue, we must avoid using funds from the WEEE products with good levy performance to subsidise the ones with poor levy performance. This will unfairly lead to the raising of the WEEE fund for products with good levy performance, but with little chance for reduction. Therefore the cost to law-abiding companies will be increased.

2. We propose that the regulators remove fluorescent lamps from the China WEEE exposure draft version catalogue. Because the recycling and disposal technology for the mercury in fluorescent lamps is immature at present, the risk caused by secondary pollution during transportation, collection, recycling and disposal procedures is high.
3. We propose that regulators make some modifications to 'Product Name' and 'Remarks' in the China WEEE exposure draft version catalogue with regard to the range hood industry to keep them consistent with the product performance and safety standards (GB/T17713 -2011 & GB4706.28-2008).
4. For large scale equipment, especially designed for professional use and used only by professional users, the recycling and disposal of this waste equipment should not be subsidised by the fund because the normal collection, recycling and disposal system for the consumer products should not apply to them. We hope the regulators will deal with these products separately from the China WEEE catalogue.
5. We are aware that spare parts, such as batteries, printer supplies and fluorescent lamps are included in the China WEEE exposure draft version catalogue. These spare parts are generally sold installed in the end equipment. If the spare parts and end equipment are both listed in the

catalogue, double levies are almost assured. We hope the regulators will take this possibility into account.

6. During the implementation of the 1<sup>st</sup> batch catalogue, the responsible departments issued a correlating table for the product catalogue and the HS code, as well as the tariff code. It was very helpful in identifying the product scope. Therefore, we hope the regulators would consider issuing a correlating table for the product catalogue and the HS code, as well as the tariff code, during the implementation of this amended catalogue.

## II. Concrete Positions

1. We propose that the regulators collect the results and summarise experiences and lessons learnt during the implementation of the 1<sup>st</sup> batch China WEEE catalogue before implementing this amended catalogue.

### **Supporting arguments:**

Based on the lessons-learnt and experiences the regulators could improve the fairness of the fund levy and utilisation system. In order to ensure fairness between law-abiding companies and illegal companies, as well as the fairness of the different products listed in the WEEE catalogue, we must avoid using funds from the WEEE product with good levy performance to subsidise the ones with poor levy performance. Doing this could unfairly lead to the raising of the WEEE fund for products with good levy performance but with little chance of reduction. Therefore the cost to law-abiding companies will be increased.

2. We propose that the regulators remove fluorescent lamps from the China WEEE exposure draft version catalogue.

### **Supporting arguments:**

- 1) At present, the recycling and disposal technology for the mercury in fluorescent lamps is immature. Because the collected lamps can only be put in landfills after they have been cut up and separated in a centralised location, and it is also very expensive.

These recycling and disposal activities will provide unsatisfactory results. The 1<sup>st</sup> result is that the current decentralised release of the mercury contained in the lamps will have to be centralised. The 2<sup>nd</sup> result is that the waste mercury will have to be deposited in landfills using professional methodologies, and have to remain so until mature technology for further recycling and disposal has been developed. The risk of environmental pollution (such as land pollution) is very high.

- 2) Fluorescent lamps are fragile and come in various shapes and a single one is of low value. As well, during the collection process a secondary pollution risk is high. Generally the waste lamps are discarded in decentralized locations and not easily collected. During the collection process, the lamps must be transported using specialised equipment according to the strict requirements for hazardous waste transportation; as well the possibility of secondary pollution is high. Furthermore, experience over many years in Europe has shown that the transportation cost is rather high.
  - 3) The materials used in fluorescent lamps are not a valuable resource and not worth recycling. The major materials in the lamps are glass and plastic. The 2% that is metal are not precious metals. The fluorescent powder only accounts for 1% of the total. Although a rare earth element is used in a very few high-end fluorescent lamps, such an insignificant content isn't worth recycling.
3. We propose that regulators make some modifications to 'Product Name' and 'Remarks' in the China WEEE exposure draft version catalogue With regard to the range hood industry to keep them consistent with the product performance and safety standards (GB/T 17713-2011 & GB4706.28-2008)

**Proposed change:**

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| Range<br>Hoods | Motor-operated appliances, which mount above a range intended to collect and dispose of contaminated air including: Deep, Pyramid, Side absorption and Other household range hood types. |
|----------------|--|

4. For large scale equipment, especially designed solely for professional use and used only by professional users, the recycling and disposal of this waste equipment should not be subsidised by the fund because the normal collection, recycling and disposal system for consumer products should not apply to them. We hope the regulators will deal with these products separately from the China WEEE catalogue.
  
5. We are aware that spare parts such as the batteries, printer supplies and fluorescent lamps are included in the China WEEE exposure draft version catalogue. These spare parts are generally sold installed in the end equipment. If the spare parts and end equipment are both listed in the catalogue, double levies are almost assured. Therefore, we hope the regulators will take this possibility into account.
  
6. During the implementation of the 1<sup>st</sup> batch catalogue, the responsible departments issued a correlating table for the product catalogue and the HS code, as well as the tariff code. It was very helpful in identifying the product scope. Therefore, we think it would be helpful if the regulators can also issue a correlating table for the product catalogue and the HS code, as well as the tariff code, during the coming implementation of this amended catalogue.

We would be very appreciative if NDRC takes our positions into account when formulating this catalogue.

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**ORGALIME** - *Speaking for European engineering, Orgalime, represents 3 industrial branches (electrical & electronic, mechanical engineering and metal articles & metalworking) that manufacture over 28% of the total EU manufacturing output and has 37 member trade federations in 22 European countries. The industry accounted for some €1,666 billion in 2011. The industry not only represents more than one quarter of the output but also a third of the EU's manufacturing industries exports.*

**ZVEI** – *the German Electrical and Electronics Industry Association is one of the world's largest electrical and electronics industry associations. ZVEI represents, with 26 product divisions and 1600 member companies, the German electrical and electronics industry with € 178 billion turnover in 2011 and accounts for more than 840,000 employees.*