

Brussels, 16 September 2011

Subject: urgent request regarding revision of WEEE-directive

Dear Member of European Parliament,

On October 4th, you will as Member of the Committee on Environment, Public Health and Food Safety of the European Parliament vote in second reading on the revision of the so-called WEEE directive. It concerns a European directive on the collection and treatment of Waste Electrical and Electronic Equipment.

The Dutch Retail Association (*Detailhandel Nederland*) representing all SME- and chain stores, altogether 110.000 shops, Uneto-VNI, trade association of retailers that sell and repair electrical and electronic equipment, and the Dutch Food Retail Association (*Centraal Bureau Levensmiddelenhandel*), representing the Dutch supermarkets, would like to ask your special attention for the following.

In first reading the European Parliament (EP) put retailers in a pivotal position with regard to the collection of small discarded electrical and electronic equipment. The EP spoke out in favor of obliging all retail shops to take in an unlimited amount of small waste appliances. As a result, consumers would no longer have to buy a new device for which they in return could discard the old product at the retail shop (the so called old for new principle).

The EP also opted for a central collection point on the shop floor and an obligation for stores to sort out waste electrical and electronic equipment on reusability. With respect to the unlimited intake and sorting obligations the EP made only an exception for small shops. They would be exempted. Small was not clearly defined.

Dutch retailers considered this position as shocking. Shops are not a waste dump, nor should they ever become one. Great was the relief when the Member States in their first reading buried the whole idea of imposing unlimited obligations for the collection of electrical and electronic waste equipment on retailers.

Unfortunately, the EP rapporteur on the revision of the WEEE directive, Karl Heinz Florenz, has in second reading simply reintroduced these obligations by way of a number of amendments. The Dutch Retail Association, Uneto-VNI and the Dutch Food Retail Association, are calling on you to not to support these amendments, or other amendments going in the same direction.

Rapporteur Karl Heinz Florenz mistakenly pays no attention to the whole range of possibilities that are already available to collect more WEEE. Besides the existing possibility for consumers to discard small waste appliances in the retail shop when they buy a new device, and the ability to discard at the traditional municipal waste dump, many additional collection possibilities have been created over the last few years. Some municipalities, for example, have conducted successful pilots to increase collection of WEEE. Consumers are also able to get rid of small electrical and electronic equipment via the so called Jekko-system, an innovative tool to first collect waste at home and then discard it afterwards. Jekko is a product of Wecycle, an organization which collects and recycles electrical appliances and energy-saving lighting equipment. Wecycle is run by manufacturers and importers and funded by consumers via a fee they have to pay on top of the retail price of new electrical and electronic products.

The unlimited collection and sorting obligations advocated by rapporteur Karl Heinz Florenz, will prove to be a big burden for especially those retail stores that are normally nearby for the consumer (like supermarkets) and which are generally easy to reach by car (such as do-it-yourself shops). As a consequence, these retailers will potentially be flooded by discarded appliances. It is important to note, that both supermarkets and do-it-yourself stores are for a significant proportion run by SME-retailers.

This is relevant in view of the fact that the EP at first reading exempted small shops from the unlimited intake and sorting requirements. However, we strongly believe that such an unlimited intake and sorting requirement should not be imposed on the retail sector at all.

Dutch retailers consider it perfectly legitimate to attempt to collect more waste appliances, as this is conducive to the environment. But, as said, first and foremost the current collection potential should be optimized. Against this backdrop municipalities play an important role. They often have excellent collection points in terms of waste dumps. Wherever possible, the number of municipal waste dumps should be increased. This is a better option than to create unworkable and even dangerous situations for retailers.

Allow us to briefly explain this point of unworkable and dangerous situations for retailers. Small waste electrical and electronic equipment includes frying pans, coffee makers, shavers, electric tools and electric knives. It is no coincidence that many of these devices are sold in stores in protective packaging and are usually accompanied by lengthy instruction manuals. By the time these devices are discarded, they will be broken and unusable. Otherwise, they will simply find a new user. Still functioning equipment, will be given away to relatives or will get a new owner through second hand shops or via the internet.

This means that equipment that, according to the EP, must be sorted for reusability in shops per definition concerns malfunctioning equipment which could cause short-circuit. Also, there will regularly be unhygienic residues present (think of hairy residues from electric razors). And there may be other, acutely dangerous situations, such as waste electrical thermometers which leak mercury, or discarded frying pans which release toxic PCBs.

The collection of these devices on a central point on the shop floor and sorting them out on reusability is irresponsible. Shop employees are not trained for this and do not have time for it either. Many dangerous situations could arise, both for shop employees and consumers. Situations which run counter to relevant to collective labour agreements and legislation on working conditions.

Dutch retailers – 110 000 companies which employ approximately 760 000 people – would like to take a constructive stance in the debate on revision of the WEEE-directive. The retail industry believes that the collection of WEEE could be significantly increased, if the consumer would be more encouraged to return waste in an environmentally friendly manner. Advertising campaigns are vital to realizing a positive change in attitude. That such changes are certainly achievable, is evidenced by the return rate of discarded batteries. About a quarter of a century ago, a start was made with intense awareness campaigns and the roll-out of a dense network of collection boxes. Currently, on an annual basis more than 80% of all discarded batteries are collected.

Besides a strong information campaign, the Dutch retail sector is in favor of more collection points for WEEE at locations that are easily accessible for the consumer. First, there should be more collection points at municipal waste dumps, but secondly, if possible, also in shopping malls. Finally, we believe that where retailers deem it from a competitive standpoint attractive – some will argue: let the consumer please discard WEEE here, then we have him directly in our shop – there could also be scope for placing additional collection bins in retail shops.

We hope that this practical approach appeals to you and will be happy to discuss any question or suggestion you may have.

Yours sincerely,



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