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Sent: 16 December 2010 11:14
To: FLORENZ Karl-Heinz
Subject: amandment 53 - elektro- und elektronik-altgeräte rl

sehr geehrter herr kollege,

ich wende mich an sie als berichterstatter für den bericht über den vorschlag für die rl des ep und des rates über elektro- und elektronik-altgeräte.

ein lieber freund von mir aus gb hat sich intensiv damit beschäftigt und hat eine sorge und einen vorschlag für amendment 53.

ich weiß, daß das ziemlich spät kommt, ich kann auch nicht wirklich beurteilen, ob sein ansinnen vernünftig ist, aber ich wollte ihnen seinen standpunkt weitergeben. vielleicht macht es sinn, das amendment - wie weiter unten vorgeschlagen - in diesem sinne zu verändern.

ich darf in der sache nach weihnachten auf sie zukommen, jetzt wünsche ich ihnen ein friedvolles fest und ein gesundes, erfolgreiches und lebensfrohes neues jahr.

alles gute,

strasser ernst

The general point about amendment 53 is that it is putting too much emphasis on the role of the retailer as a collection point for this waste electrical equipment. In effect, it will be the retailer - and not the manufacturer of the product - who will have to shoulder the burden of advertising itself as a collection for all kinds of small waste, whether it be related to the types of product sold in the shop or not. For example, a shop selling shoes containing small electronic components, could be obliged to collect a variety items such as toasters and mobile phones.

This a very onerous amendment for small high street retailers: a) shop space is restricted and it would be difficult to have collection points for several different goods, especially as some products such as low energy light bulbs need special facilities b) advertising the collection service will cost money and may encourage consumers to dump all sorts of goods in retail outlets c) the logistical problems of returning the goods to a multitude of manufacturers will be costly and time-consuming . It also introduces unfair competition: retailers with shops will be disadvantaged by the cost, but on-line retailers will not be effected. It is better that this waste goes to the bigger, municipal waste depots in places such as supermarket car parks where consumers are used to taking goods for recycling, and/or waste is collected from consumers' homes.

So I would like to strike out amendment 53. This, of course, may be too much to ask at this stage. So I have two suggestions for making the amendment less damaging to its commercial interests..

At present 1a. says:

1a. In order to raise users' awareness,

Member States shall ensure that

distributors put in place appropriate

collection and awareness schemes for very
small volume waste.

This could be adapted to say (... denotes words taken out and new words are in bold):

1a. In order to raise users' awareness,
Member States shall ensure that
distributors put in place appropriate
collection . for very small volume waste,
**but only in cases where the distributor
sells like for like products.**

This new version prevents the need to advertise collection points, and makes sure that only
goods sold in the shop can be returned.

I hope this is clear but let me know what you think. I get the impression that there is still time to
make changes to this legislation, which at the moment does not take into account the effect it
will have on a number of small to medium size businesses.