

**Dolby Laboratories
and The SMART Group**

**Discussion Forum
Thursday 15th May**


**Welcome to
Wootton Bassett!**



Agenda

- 10.00am Arrival – coffee & registration
- 10.30am Introductions
- 11.00am Discussions
- 12.30pm Lunch – factory tour
- 13.30pm Continue Discussions
- 15.00pm Summing up and conclusions
- 15.30pm End
- Dolby Film Demo







EU Directive 2002/95/EC

- “On Restriction on the use of certain Hazardous Substances in electrical and electronic equipment” (**RoHS**)

RoHS EUR-LEX link

- Came into force February 13 2003
- Must be transposed into UK Law by August 13 2004
- Compliance required by July 1 2006





EU Directive 2002/96/EC

- “On Waste Electrical and Electronic Equipment” (**WEEE**)
- WEEE EUR-LEX link
- Came into force February 13 2003
- Must be transposed to UK Law by August 13 2004
- Requirements are to be enforced by August 13 2005





Department Of Trade & Industry Discussion Paper

- Published March 28 2003
- Seeks initial views on how the UK Government and its Devolved Administrations should transpose and implement the requirements of both Directives into UK Law.
- Responses by May 30 2003





Department Of Trade & Industry Discussion Paper

- PDF form paper copy for download
<http://www.dti.gov.uk/sustainability/pdfs/weee-rohs-condoc.pdf>
- Online Interactive Document
<http://www.businesslink.org/consult>





RoHS Question 1

(Related to Article 2)

- Concern has been expressed about the term "put on the market". Does this mean equipment manufactured after 30 June 2006, all equipment leaving the manufacturer's premises after this date or all equipment on sale to the final user after this date? The Government would welcome your views on what you consider to be the most practicable and unambiguous interpretation. Our initial view is that it should apply to goods leaving the factory gate (or, where manufacture takes place outside the single market, on entry to the EU).





RoHS Question 2

(Related to Article 2)

- Concern has also been expressed about the application of Article 2.3. We believe that the exemption for spare parts applies only to equipment that has been sold to the end user on or before 30 June 2006, but would welcome views and comments if you believe that this interpretation may cause problems.





RoHS Question 3

(Related to Article 3)

- The scope of the RoHS Directive applies to an enormous range of electrical and electronic equipment.
- Do you believe the Directive's definition of 'electrical and electronic equipment' is adequate?
- If not, what changes would you wish to see?





RoHS Question 4

(Related to Article 3)

- The definition for 'producer' covers the procurement of EEE from outside the European Community by telephone, fax and internet.
- Who should be held to be the 'producer', and thereby responsible for ensuring that the equipment does not contain the restricted substances, in these circumstances?





RoHS Question 5

(Related to Article 4)

- Are the exemptions to the RoHS Directive both clear and practicable?
- If not, how would you frame them?

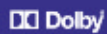




RoHS Question 6

(Related to Article 4)

- The UK considers that products intended specifically for military purposes should be exempt from the regulations implementing the Directive. We would welcome your views on this.





RoHS Question 7

(Related to Article 5)

- Do you agree with the European Commission's initial proposals for the maximum concentration values?
- If not, can you suggest alternative values and support your views with relevant evidence?





RoHS Question 8

(Related to Article 5)

- The proposals for the maximum concentration values apply to "specific materials and components". The Directive does not contain a definition for "components". The Government would welcome suggestions for a definition that is both clear and practicable.





RoHS Question 9

(Related to Article 5)

- Do you believe there is a case for additional exemptions that might be considered under the Committee procedure outlined above?
- If so, what other exemptions would you wish to see brought forward for consideration and what are the environmental, technical or scientific reasons for them?





RoHS Question 10

(Related to Article 7)

- Do you support the UK's view that a decision on the possible inclusion of Deca BDE should be delayed until the risk reduction strategy has been completed?





RoHS Question 11

(Related to Article 7)

- Do you have any comments on the other specified applications listed in paragraph 10 of the Annex?
- If so, could you outline these and support your comments with any supporting evidence for them?





RoHS Question 12

(related to Article 7)

- Can you suggest maximum concentration levels for the flame retardants (PBBs and PBDEs)?





RoHS Question 13

(Related to Article 8)

- To establish compliance with the Directive, formal testing procedures will need to be established for each of the banned substances.
- Which methods would you wish to see used and can you support your suggestions with evidence of their technical viability?

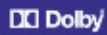




WEEE Question 1

(Related to Article 2)

- What criteria would you wish us to use bearing in mind the requirements laid out in the Directive?
- How might this be applied in practice?





WEEE Question 2

(Related to Article 2)

- Do you manufacture or import electrical products, which you believe do not fall within the scope of the Directive?
- Please provide details of the products and your reasons.





WEEE Question 3

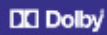
- (Related to Article 2)
- Do you agree with this approach?
- If not, what alternative would you suggest?





WEEE Question 4

- (Related to Article 2)
- Which products do you believe present particularly difficult problems and why?
- What criteria might be used to aid interpretation?





WEEE Question 5

- (Related to Article 3)
- Are there other definitions that you consider are not straightforward?





WEEE Question 6

- (Related to Article 3)
- What further definitions do you think would be helpful in facilitating UK implementation? Suggestions of preferred wording would be especially useful.





WEEE Question 7

- (Related to Article 3)
- The definition for 'producer' covers the procurement of EEE from outside the European Community by telephone, fax and internet.
- Who might be held to be the 'producer' when products are delivered directly to the consumer?





WEEE Question 8

- (Related to Article 4)
- Would a negotiated voluntary agreement or legislation be the best way for the Government to encourage the design of equipment for recycling and discourage designs that prevent reuse?





WEEE Question 9

- (Related to Article 4)
- Should industry standards be used to encourage design for recycling and discourage prevention of reuse?
- Government endorsed?





WEEE Question 10

- (Related to Article 4)
- Should the voluntary agreement/legislation on product design be generic, or specific to categories or sectors of EEE?





WEEE Question 11



- (Related to Article 4)
- How should compliance with the product design provisions be monitored?



dti

WEEE Question 12



- (related to Article 4)
- How should the Government fulfil the requirement to ensure that manufacturers do not prevent WEEE from being reused through design features or specific processes?

dti

WEEE Question 13



- (Related to Article 5)
- What would be the best approach to meeting the retailer take-back obligations?

dti

WEEE Question 14

- (Related to Article 5)
- Should collection obligations be placed on anyone else?
- If you believe that an option should not be given further consideration, please give your reasons.



WEEE Question 15

- (Related to Article 5)
- Which mechanism do you favour for meeting the collection obligations and why?
- Please give an estimate of the costs if possible.





WEEE Question 16

- (Related to Article 5)
- How should WEEE be collected to encourage reuse?





WEEE Question 17

- (Related to Article 6)
- Which permitting option do you prefer and why? Are there other alternatives?
- What are the cost and benefits to you of the proposed options?





WEEE Question 18

- (related to Article 6)
- How feasible do you think the treatment operations set out in the Directive are?





WEEE Question 19

- (related to Article 6)
- Should standards be agreed for these processes? If so, who should set them? The British Standards Institute, The European Standards Organisations or through UK Regulations?





WEEE Question 20

- (related to Article 6)
- Do you believe it is necessary to remove the required items prior to shredding or as part of that process?
- Why?
- What would be the benefits and costs?





WEEE Question 21

- (Related to Article 7)
- Can you suggest an alternative to the protocols based approach for monitoring the UK's progress and compliance with the recovery and recycling targets?





WEEE Question 22

- (Related to Article 7)
- Do you have any ideas on how to develop recovery and recycling protocols for WEEE?





WEEE Question 23



- (Related to Article 7)
- If a protocol based approach were to be implemented for the recovery and recycling targets, how often should the protocols be reviewed?



dti

WEEE Question 24



- (related to Article 7)
- Do you have an alternative suggestion to using evidence notes of some form to prove that recovery/recycling has taken place?

dti

WEEE Question 25



- (Related to Article 7)
- How should component reuse be measured?

dti

WEEE Question 26

- (related to Article 7)
- How should we measure whole appliance reuse in the future?



WEEE Question 27

- (Related to Article 8)
- The Directive allows the UK scope to introduce a 'visible fee' to be paid by consumers of new products to finance the waste from old products for 8-10 years.
- Do you think the UK should introduce such a 'visible fee'? If so:
 - - who should set the fee?
 - - at what level should the fee be set?
 - - on what products?
 - - who should administer and distribute the funds from the fee?





WEEE Question 28

- (Related to Article 8)
- The Directive says that producers should provide a 'guarantee' to cover the costs of waste from products they put on the market after 13 August 2005.
- What form do you think this guarantee should take?





WEEE Question 29

- (Related to Article 8)
- Should the UK allow more than one type of guarantee to exist?





WEEE Question 30

- (Related to Article 8)
- Who should enforce the system of guarantees to ensure that there are no 'free-riders' and 'orphan' products?





WEEE Question 31

- (Related to Article 8)
- What is your preferred method for financing the costs of the WEEE Directive in the UK?
- Why do you prefer this method?
- What are the costs and benefits?





WEEE Question 32

- (Related to Article 8)
- How should the UK finance the costs of the WEEE Directive to ensure that the environmental benefits are maximised:
- at least cost to the UK?
 - with least impact on UK competitiveness?
 - in the most equitable manner?
 - with minimal administrative complexity?





WEEE Question 33

- (Related to Article 9)

How do you think Article 9 should be implemented to ensure that the environmental benefits are maximised in the most cost effective manner to the UK?



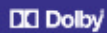


WEEE Question 34

- (Related to Article 9)

• Do you think business users of EEE who dispose of their equipment without replacing it should be responsible for financing the treatment and recovery of this WEEE?

• If not, who should finance these costs?





WEEE Question 35

- (Related to Article 10)

Who should be responsible for providing end-users with the information in Article 10, and why?





WEEE Question 36

- (Related to Article 10)

What action or sanction do you think would be appropriate in the case of an inadequate strategy or failing to act on an approved strategy?



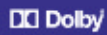


WEEE Question 37

- (Related to Article 10)

- Do you consider that the requirements of Article 10 (other than product marking) could be met in a more collective way?

- If so, how might such a system operate, how would it be funded and how might compliance be monitored and assessed?





WEEE Question 38

- (Related to Article 10)

- Do you consider that there will be any difficulties in achieving the marking requirement for the products?

- Please explain in detail those difficulties you envisage.





WEEE Question 39

- (Related to Article 11)

Which option do you favour and why?





WEEE Question 40

- (Related to Article 11)
- Do you have a website?
- If so, do you think that placing the information required by this article will be possible?
- What would be the costs?





WEEE Question 41

- (Related to Article 11)
- If there was to be a single website providing information for treatment facilities, do you have any views as to who should operate it, the cost of operating it and how these costs might be met (e.g. a flat fee, per product, etc)?





WEEE Question 42

- (Related to Article 12)
- How do you think the producer registration system should operate, for example, would you favour an annual registration process (as under the Packaging Regulations) or continuous registration with periodic submission of data?





WEEE Question 43

- (Related to Article 12)
- What sanctions should there be in respect of producers who fail to register on time or fail to supply accurate data?





WEEE Question 44

- (Related to Article 12)
- Do you favour an alternative approach for obtaining information on producers, their products and the fate of WEEE?
- If so, how would the information be obtained and what would be the cost implications of the alternative approach?





WEEE Question 45

- (Related to Article 12)
- How might reprocessing of UK WEEE overseas be monitored and verified?





WEEE Question 46

- (Related to Article 12)
- How should distance selling be dealt with?





WEEE Question 47

- (Related to the partial Regulatory Impact Assessment)
- Do you agree with the estimates for the potential benefits and costs outlined?
- If not please provide your own estimates with supporting data wherever possible.



Related Events

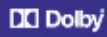
- The SMART Group Lead-Free Hands On Experience
Nepcon June 11th and 12th, Metropole Hotel, Brighton

[Lead-Free - Nepcon Brighton Link](#)

- IPC/SOLDETEC - Conference and Workshops on Lead Free Electronics "Towards Implementation of the RoHS Directive"

June 10-12th ,Conrad Brussels Hotel, Brussels, Belgium

[IPC/SOLDETEC Conference Link](#)



That's All Folks!