**The Expert Working Group (EWG) on the Review of Annexes -**

**B. Submission of the European Union and its Member States**

The European Union and its Member States would like to submit a feedback to the working documents for Annexes IV.A, IV.B and IX (B1110) prepared by the co-chairs of the expert working group on the review of Annexes (see Appendices). The proposed changes and comments are preliminary and further suggestions may be submitted at a later stage.

**Working document for Annex IX.B1110**

**Decision BC-13/2:** Mandate for the review of Annex IV and the related aspects of Annex IX

(iii)Clarify the descriptions in Annex IV and in Annex IX (B1110) to address conflicts or overlaps.

**How to use this document:** Please complete the table with your comments, including ‘problem statement’, ‘proposed change’ and ‘rationale’. Leave blank if no change is required. **Bold** **and** **underline** for additions and strikethrough (e.g., ~~strikethrough~~) for deletion of text.

**Submitting member/observer: European Union and its Member States**

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| **A** | **B** | **C** | **D** | **E** |
| **B1110**  **Electrical and electronic assemblies:** | **Problem statement** | **Proposed change** | **Rationale** | **General comments** |
| * Electronic assemblies consisting only of metals or alloys |  |  |  |  |
| * Waste electrical and electronic assemblies or scrap19 (including printed circuit boards) not containing components such as accumulators and other batteries included on list A, mercury-switches, glass from cathode-ray tubes and other activated glass and PCB-capacitors, or not contaminated with Annex I constituents (e.g., cadmium, mercury, lead, polychlorinated biphenyl) or from which these have been removed, to an extent that they do not possess any of the characteristics contained in Annex III (note the related entry on list A A1180) |  | Waste electrical and electronic assemblies or scrap19 (including printed circuit boards**, electronic components and wires**) not containing components such as accumulators and other batteries included on list A, mercury-switches, glass from cathode-ray tubes and other activated glass and PCB-capacitors, or not contaminated with Annex I constituents (e.g., cadmium, mercury, lead, polychlorinated biphenyl) or from which these have been removed, to an extent that they do not possess any of the characteristics contained in Annex III (note the related entry on list A A1180) | Insertion of examples from the next indent for clarification. |  |
| * Electrical and electronic assemblies (including printed circuit boards, electronic components and wires) destined for direct reuse,20 and not for recycling or final disposal21 | The text appears to indicate that assemblies destined for direct reuse may be waste. This is not consistent with the approach that has been agreed on an interim basis in the technical guidelines on e-waste and that is contained in the Glossary of terms.  The text “and not for recycling or final disposal” seems misleading. | * ~~Electrical and electronic assemblies (including printed circuit boards, electronic components and wires) destined for direct reuse,~~~~20~~ ~~and not for recycling or final disposal~~~~21~~ | Electrical and electronic assemblies that are non-hazardous waste seem to be covered by the previous indent. |  |

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| **General comments** |
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| **A** | | **B** | **C** | **D** | **E** |
| **Footnotes** | | **Problem statement** | **Proposed change** | **Rationale** | **General comments** |
| **19** | This entry does not include scrap from electrical power generation. |  |  |  | Entry A1180 contains the same footnote |
| **20** | Reuse can include repair, refurbishment or upgrading, but not major reassembly. | According to the Glossary of terms, reuse is different from repair and refurbishment. | ~~Reuse can include repair, refurbishment or upgrading, but not major reassembly.~~ | Consequential change to the deletion of the indent. |  |
| **21** | In some countries these materials destined for direct re-use are not considered wastes. | The text appears to indicate that assemblies destined for direct reuse may be waste in some countries. This is not consistent with the approach that has been agreed on an interim basis in the technical guidelines on e-waste and that is contained in the Glossary of terms. | ~~In some countries these materials destined for direct re-use are not considered wastes.~~ | Consequential change to the deletion of the indent. |  |

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| **General comments** |
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| **Overarching comments** |
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