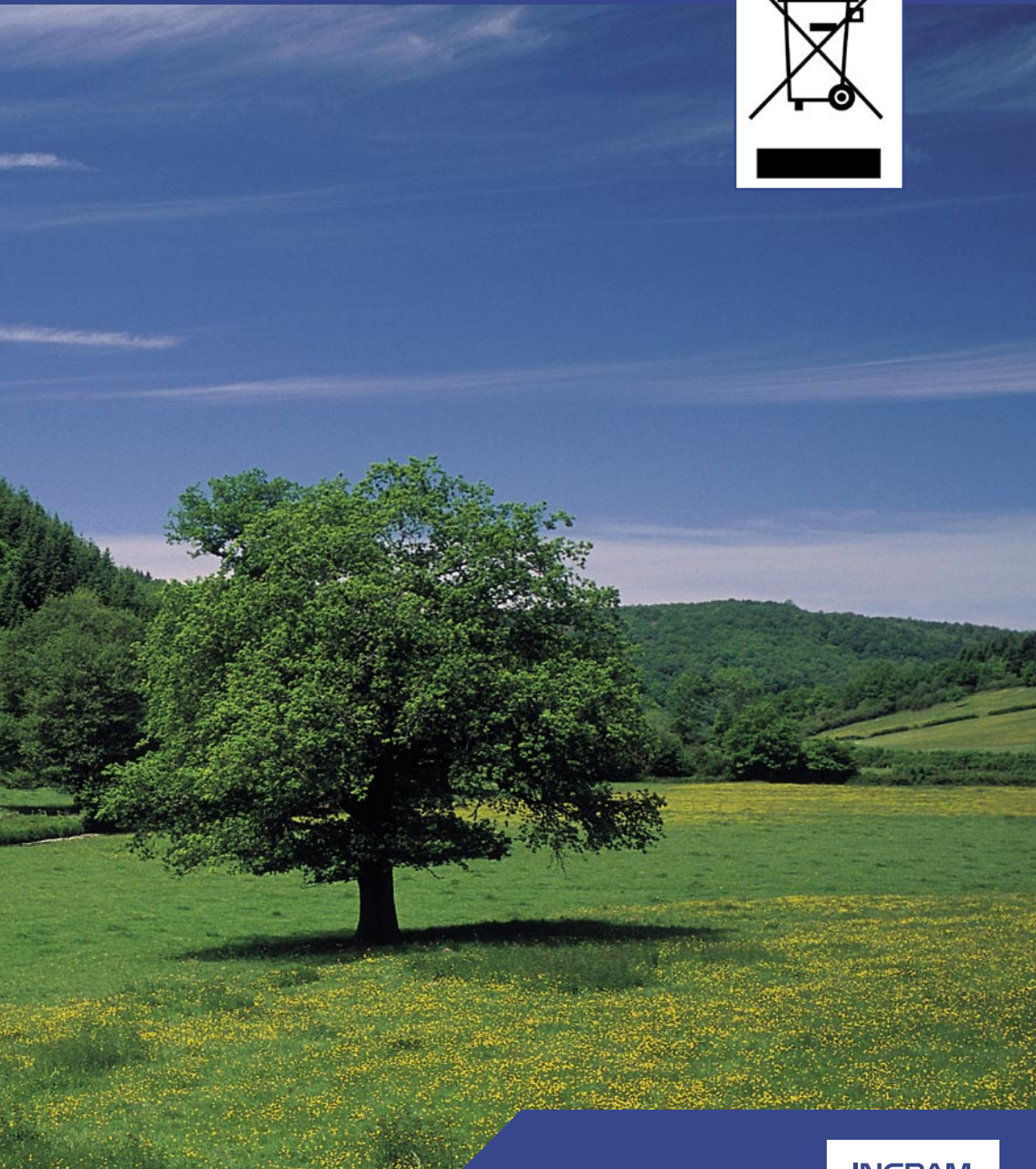


WEEE-legislation in Europe

EU

What you need to know!



The WEEE-challenge

The European WEEE-Directive (Directive 2002/96/EC on Waste Electrical and Electronic Equipment) is planned to be transposed in national WEEE-legislation and become effective in all member states by 13 August 2005. National WEEE-Legislation will differ from member state to member state since the WEEE-Directive gives leeway for individual solutions. The new national WEEE-legislation will give the responsibility for taking back and disposing of waste electronic equipment to industry and trade. As a result the whole IT and telecommunications market is faced with great challenges.

Product responsibility for waste equipment

When the national WEEE-legislations come into force, producers of electrical equipment are for the first time responsible for taking back, properly handling, recycling, and disposing of their products.

To support the recycling economy WEEE-legislation prescribes quotas for the re-utilisation and recycling of various equipment groups. The objective of the legislation is to promote disposal capability, environmental compatibility and waste prevention, starting already in the production stages of new equipment. For example, the use of hazardous substances above certain thresholds will be forbidden from July 2006.

Are you affected by WEEE-legislation?

A 'producer' in the sense of WEEE-legislations is that person or company that puts products on the local market of any EU member state for the first time, including "imports" from one member state into another member state. This will affect you if you as a company are based in any of the EU member states or if you supply into the local market of any of the EU member states.

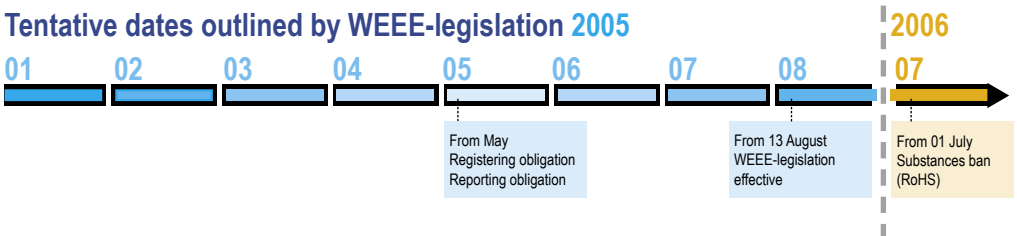
But also if you yourself are not a producer in the sense of new WEEE-legislation, e.g. you supply an EU member state via an importer or distributor like Ingram Micro, your products will be affected by the terms of the WEEE-legislation. In particular where the labeling obligation, substances ban, recyclability, product conception, and the reporting obligation are concerned, your products may be marketed in the EU only if they comply with the provisions under the WEEE-legislation. Moreover, importers will most probably pass on the take-back and disposal costs to producers abroad as well.



Time is pressing!

Although the new WEEE-legislation is still to be passed in many of the EU-countries, time is pressing. By the time that WEEE-legislation becomes effective in only one European member state any other member state could be affected by that legislation due to cross border transactions. Although more precise details have yet to be given to numerous aspects of national WEEE-legislations, its essential features are outlined in many cases. We must prepare ourselves for the following dates.

Tentative dates outlined by WEEE-legislation 2005



Fit for the future?

In a step by step process the WEEE-legislation raises the requirements for products that are to be sold in the European Union. Producers will gain competitive advantages if they prepare themselves in good time. Delay, and you risk the saleability of any of your products in the European Union.

Registering obligation

As of a certain date all producers must register at the national "Clearing House" of the local EU member states where they put their products on the market. They must quote their assigned registration number in all business correspondence. The registration is published on the internet.

Financing obligation

All producers must guarantee every year that they can finance the disposal with funds secured against insolvency. The guarantee may take the form of participation in an appropriate scheme for the financing of the producers obligations, a recycling insurance or a blocked bank account.

Reporting obligation (Market-Input)

Producers are obliged to report to the local WEEE-authorities the products they put on the local market. Each producer's disposal quota is determined on the basis of this report.

Labeling obligation

All new equipment put on the EU market must be provided with a unique producer's reference and the valid symbol (crossed-out waste container). Products without, or with incorrect labels, must no longer be put on the market.

Take-back obligation

Every producer that puts electrical and electronic equipment on the local market of any of the EU member states is obliged to take back and dispose of its products.

Reporting obligation (Take-Back)

The take-back obligation also obliges producers to report and verify the waste equipment they have processed. Fulfillment of the required recycling quotas must be documented. Reports must be drawn up at regular intervals.

Recyclable product conception

When the WEEE-legislation comes into force, various quotas will apply to the re-utilisation and recycling of waste equipment according to equipment types. Producers are urgently advised to manufacture their products in a way that does not conflict with this legislation.

Substances ban*

From July 2006 electrical and electronic equipment are allowed to contain only very restricted quantities of hazardous substances according to the European RoHS-Directive (Directive 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment).

Violations are expensive!

Producers violating the WEEE-legislations particular the labeling-, registering- and reporting obligation, the substances ban, or environmentally compatible disposal, may be fined (e.g. in Germany up to EUR 50.000,- for each violation) and in the worst cases, producers risk being forbidden from selling their products!

Contact addresses

Contact at Ingram Micro Europe

VendorManagement@ingrammicro-europe.com

Contact at your local Ingram Micro office

The new WEEE-legislation at a glance

Product responsibility

- Labelling obligation
- Conforming product conception
- Substances ban from July 2006*

Take-back obligation

- Registering obligation at the Local WEEE-register
- Verifying and reporting obligation
- Financing obligation, e.g. with guarantee funds
- Disposal obligation
- Adherence to recycling quotas

Who are the “producers” of electrical and electronic equipment

- Persons or companies manufacturing equipment under their brand names and putting them on the market of a European member state for the first time
- Persons or companies reselling equipment from other manufacturers in one of the European member states under their brand name
- Persons or companies importing equipment and putting it on the market of a European member state for the first time
- Persons or companies offering for sale equipment from non-registered producers

Which products are affected?

WEEE-legislation affects all products, whether refrigerators or fluorescent tubes. In the IT and telecommunications sectors these products are primarily:

- IT and telecommunications equipment such as PCs, printers, displays, telephones, fax machines etc.
- Consumer electronics such as MP3 players and digital cameras etc.
- Toys such as game consoles and accessories etc.

* What falls under the RoHS-substances ban?

Products that contain more than 0.1% by weight of the following substances:

Lead, mercury, hexavalent chromium, polybrominated biphenyl (PBB), polybrominated diphenyl ether (PBDE), or 0.1% by weight of cadmium per homogeneous material!