



Amendment Nr.	Article	Content	Vote	Justification
Amendment 386	Article 3	Definition of municipal waste	Yes	In practice, legislators must guarantee that mixed waste and separately collected waste from other sources than households such as retail trade, small businesses (according to 2003/361/EC), office buildings and institutions (such as schools, hospitals, government buildings) can be considered as municipal waste if it is similar to household waste as far as its nature, composition and quantity is concerned. As to the last criterion (quantity), a more precise threshold of 1,100 litres of mixed waste per months would assure a clear-cut distinction.
Amendment 553	Article 5 para. 1 point d	By-products	Yes	UEAPME welcomes that the legislative proposal aims at a greater harmonization and simplification of the legal framework on by-products and end-of-waste status. However, instead of empowering the Commission to establish detailed criteria of the conditions of by-products in delegated acts, these criteria should be set in the proposal. A clear definition must ensure a more uniform interpretation of by-products and waste on a European and national level.
Amendment 559	Article 5 para. 2	By-products	No	The criteria of the conditions of by - products need to be determined by this directive. The competence of the Commission to adopt delegated acts should be limited to a certain number of provisions, which are not of vital importance for the whole legislative project.
Amendment 556 Amendment 557 Amendment 558	Article 5 para. 2	By-products	Yes	A clear definition of by-products is needed to ensure a more uniform interpretation and waste on a European and national level. Instead of empowering the Commission to establish detailed criteria of the conditions of by-products in delegated acts, these criteria therefore need to be set in the proposal.
Amendment 622	Article 8 Para. 1 Subpara. 3	Extended Producer Responsibility	Yes	UEAPME highly welcomes the proposal to ensure that small enterprises can cope with the constraints arising from the obligations linked to the extended producer responsibility.
Amendment 661 Amendment 662	Article 8a	Extended Producer Responsibility	Yes	UEAPME welcomes the Commission's intention to increase transparency with regard to Extended Producer Responsibility (EPR) schemes and to create a level playing field for all manufacturers within the EU.



However, the plans to introduce a reporting procedure for all products that are placed on the European market (Article 8a) would result in additional reporting obligations which could hardly be handled by businesses.

Amendment 684	Article para. 1	8a	Extended Producer Responsibility	Yes	If AM 661, or AM 662 fall, this amendment should be agreed upon.
Amendment 734	Article para. 4	8a	Extended Producer Responsibility	Yes	<p>If AM 661, or AM 662 fall, this amendment should be agreed upon.</p> <p>UEAPME strictly opposes the proposal that all costs for waste management have to be borne exclusively by businesses under EPR schemes and suggest that all actors involved in the product life cycle, including consumers, should have their share of responsibility.</p> <p>Considering the amounts of costs and red tape linked to EPR, support measures for SMEs at local level would be necessary. Furthermore, it is still doubtful if, in practice, producers from third countries would adhere to the same standards as companies based in the EU. As European standards are difficult to enforce outside of the Union, EU businesses would suffer additional competitive disadvantages.</p>
Amendment 736	Article para. 4	8a	Extended Producer Responsibility	Yes	<p>If AM 661, AM 662 and AM 734 fall, this amendment should be agreed upon.</p> <p>UEAPME strictly opposes the proposal that all costs for waste management have to be borne exclusively by businesses under EPR schemes and suggest that all actors involved in the product life cycle, including consumers, should have their share of responsibility.</p> <p>Considering the amounts of costs and red tape linked to EPR, support measures for SMEs at local level would be necessary. Furthermore, it is still doubtful if, in practice, producers from third countries would adhere to the same standards as companies based in the EU. As European standards are difficult to enforce outside of the Union, EU businesses would suffer additional competitive disadvantages.</p>



Amendment 1235 Amendment 1236	Article 26	Registration	Yes	UEAPME welcomes that the proposal allows member states to exempt competent authorities from keeping a register of establishments which collect or transport quantities of non-hazardous waste not exceeding 20 tonnes annually. A threshold for the transport of hazardous waste should, however, be also regulated in the framework directive and not in a delegated act. The threshold for transporting hazardous waste should be 2 tonnes annually, under which businesses do not have to keep a register. This threshold is currently in place in Germany.
Amendment 1239 Amendment 1240 Amendment 1241	Article 26	Registration – delegated acts	Yes	The competence of the Commission to adopt delegated acts should be limited to a certain number of provisions, which are not of vital importance for the whole legislative project. Since the potential consequences of amending this article after a certain period of time could pose major problems for businesses in Europe, this provision needs to be determined in the current directive.
Amendment 1258	Article 35		No	The current regulation of providing data to the competent authority upon request has proven to be adequate and successful in practice. Extending this obligation to specific information on their exact location, and safe extraction procedures for repair and reuse centers as well as recycling would even increase the burden for SMEs.