Hewlett Packard Enterprise and European WEEE Compliance

Background

The European Union’s Waste Electrical and Electronic Equipment Directive (WEEE) has been European Law since 2003 (Directive 2002/96/EC). In 2012 this Directive has been recast and Member States must implement the new Directive (2012/19/EU) into national law by February 2014. The WEEE Directive including the recast of the WEEE Directive contain several obligations imposed on producers of electrical and electronic equipment, such as Hewlett Packard Enterprise. Hewlett Packard Enterprise’s compliance approach for these obligations is provided below.

1. Product design

Since 1992, Hewlett Packard Enterprise has focused on specific environmental issues through our Design for Environment (DfE) program. DfE is an engineering perspective in which the environmentally related characteristics of a product, process or facility are optimized. Together, Hewlett Packard Enterprise’s product stewards and product designers identify, prioritize and recommend environmental improvements through a company-wide DfE program.

Hewlett Packard Enterprise’s Design for environment program is used to ensure that the design and production of HP branded electronic and electrical equipment takes into account the dismantling and recovery of WEEE and its components and materials. For more information please visit: https://www.hpe.com/us/en/about/environment/design-for-environment.html

2. WEEE marking

All Hewlett Packard Enterprise products which are subject to the WEEE Directive placed on the market from August 13th 2005 are compliant with the WEEE marking requirements. Such products are marked with the “crossed out wheelie bin” symbol shown below in accordance with the European Standard EN50419.

Hewlett Packard Enterprise and Product Recycling

Product recycling is nothing new to Hewlett Packard Enterprise and Hewlett Packard Enterprise has participated in the development of the WEEE Directive at all stages of the legislative process both at EU and member state level. Hewlett Packard Enterprise will comply with the provisions of the WEEE Directive and national implementing legislation.

Hewlett Packard Enterprise does not allow e-waste to be exported from developed countries (Organization for Economic Co-Operation and Development and European Union) to developing countries (non-OECD countries outside the EU), either directly or through intermediaries, and engages with governments to help improve national and international legislation governing the movement of electronic waste, such as the Basel Convention on the Control of Transboundary Movements of Hazardous Waste and Their Disposal.

For more information visit: www.hpe.com/recycle

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3. Information for users

Hewlett Packard Enterprise provides information to end users on the meaning of the crossed out wheelie bin in accordance to EU Member State requirements. The following information is available within product documentation and where not applicable by electronic means:

_This symbol means do not dispose of your product with your other household waste. Instead, you should protect human health and the environment by handing over your waste equipment to a designated collection point for the recycling of waste electrical and electronic equipment. For more information, please contact your household waste disposal service or go to http://www.hpe.com/recycle._

4. Registration and reporting

Hewlett Packard Enterprise fulfils all legal requirements resulting from the transposition of the WEEE Directive in member states’ legislation and registers with national authorities, on time, in all member states where Hewlett Packard Enterprise is obliged. Registration and enforcement dates are country dependent. Hewlett Packard Enterprise also ensures that any information required for the calculation of Hewlett Packard Enterprise’s producer obligations is provided as of the date specified in member state legislation.

5. WEEE from private households

Hewlett Packard Enterprise products are designed and intended to be used by users other than private households.

6. WEEE from users other than private households

Hewlett Packard Enterprise has established its own recycling system for WEEE and provides this service in compliance to applicable member state requirements.

Hewlett Packard Enterprise will provide free recycling of all Hewlett Packard Enterprise branded electronic equipment once a customer has returned the equipment to an HPE approved recycler. For non-Hewlett Packard Enterprise branded electronic equipment Hewlett Packard Enterprise will provide the same service where a replacement product is being supplied by Hewlett Packard Enterprise. Where a replacement product is not being supplied, recycling services can be provided on request at additional cost.

Services which Hewlett Packard Enterprise can provide under Hewlett Packard Enterprise’s Product Return and Recycling program include:

- Recycling
- Certificate of Recycling
- Drop off locations at Hewlett Packard Enterprise authorized recycling facilities or;
• Collection at customer facility for consignments of IT hardware weighing at least 1 ton\(^2\)
• Transportation to an Hewlett Packard Enterprise authorized sorting and waste facility
• Management and control of the whole logistic and recycling chain
• Special solutions by arrangement including equipment removal, transportation packaging and serial number tracking.

Where national legislation dictates that other services should be offered, Hewlett Packard Enterprise adapts its service accordingly to be compliant.

Hewlett Packard Enterprise also offers a range of product reuse services for commercial customers such as trade in and asset management services.

Customers can access Hewlett Packard Enterprise’s return and recycling service by visiting [www.hpe.com/recycle](http://www.hpe.com/recycle)

7. Treatment

In accordance with Community waste legislation, Hewlett Packard Enterprise requires that treatment and recycling of WEEE done on behalf of Hewlett Packard Enterprise, either by a collective scheme or individually, is carried out in accordance with the requirements of the WEEE Directive, as set out in the implementing legislation of the member states, including requirements respecting special treatment for specified parts and overall recovery rates achieved.

8. Information for treatment facilities

Hewlett Packard Enterprise produces reuse and treatment information for each type of new EEE put on the market within one year after the equipment is first put on the market in accordance to the requirements under the WEEE Directive.

Hewlett Packard Enterprise makes the required information available to treatment facilities and reuse centers by the date specified in member state legislation, typically within one year after the new products have been put on the market or sold after 13th August 2005.

Industry associations DIGITALEUROPE (formerly EICTA), CECED (European Committee of Domestic Equipment Manufacturers) AeA Europe (American Electronics Association Europe), and EERA (European Electronics Recyclers Association), have developed a common understanding of information needs on equipment characteristics relevant for fulfilling the information for treatment facilities requirements in the WEEE Directive.

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\(^{2}\) Hewlett Packard Enterprise can also provide customer site collection for volumes under 1ton for a fee based on current market prices.
Hewlett Packard Enterprise follows this common understanding and approach in so far to comply with the information for treatment facilities requirements under the WEEE Directive.

For more information please visit http://www8.hp.com/us/en/hpe/hp-information/environment/resources.html

9. Minimum requirements for shipments of used EEE

Hewlett Packard Enterprise will sometimes be required to move used equipment to and from our repair partners for the purpose of repair, refurbishing, remanufacturing or root cause analysis. Such movements can often include trans-border shipments across European and international borders.

Annex VI of the WEEE Directive and its transposition into member state law establishes certain minimum criteria for the shipment of used equipment. Hewlett Packard Enterprise complies with the criteria under Annex VI of the WEEE Directive for shipping non-functional or repaired used equipment.