

Last Check: Device types pursuant to ElektroG

ElektroG has been completely in force since 15 August 2018. Check your new device types again before the first monthly report in order to avoid prohibitions of marketing!

ElektroG has been completely in force since 15 August 2018. Now all electric and electronic devices, excepting those in the categories listed in § 2 par. 2 ElektroG, must be registered in Germany in order to be marketable. Registration itself is nothing new. The new thing here is the **extension of the law to cover electronic devices**, which had not been affected to date. The other new thing is that the **products are classified in new device types and categories along with the associated guarantee parameters**.

Beginning in September 2018 (or in November 2018 with application for a transition period) the monthly input quantities must be reported for the new device types and the annual quantity for 2018 must be stated in terms of the new device types at the beginning of 2019. Hence now is your last chance to check your assignments to categories in order to prevent errors and avoid additional costs.

The next step: Conversion of the existent device types on 26 October 2018

Device registrations which have already existed will be converted to the new device types regulated by law effective 26 October 2018. In the past there were 10 product categories with 32 device types, whereas in future it will be only 6 categories with 17 device types. Conversion rules have been laid down by law to specify which product shall belong to which new category/device type in future. An overview of this is available from [Stiftung ear](#).

Sounds easy enough, but the conversion can also have its difficulties in detail, as the following example shows.

Manufacturer A has been marketing various electric tools under its brand B for many years. These are still recorded in the category “Electric and electronic tools (b2c)” and, according to the conversion table, will be converted automatically to the new type “Small devices (b2c)”. However, whether this is correct depends on the size of the tool.

It depends on the size.

Tool with all outer dimensions
≤ 50 cm



Devices category
"Small devices (b2c)" correct



✓ No need to act: Conversion
takes place automatically on
26 Oct. 2018

Tool with an outer dimension
> 50 cm



Correct device category is not
"Small devices (b2c)", but
"Large Devices (b2c)"



! **Need to act:**
**Manufacturer must submit an
application for a new or
replacement registration.**

**Attention! Toys and
game computers!**

A similar situation arises for **toys**. They are all placed in the device type "Small devices that can be used in private households". However, once again the product size is decisive, whether the toy is a "large device that can be used in private households", in which case the registration must be adjusted.

After matching with other European registers, **game computers** and consoles fall, depending on their size and as a simplification, in the device type of "large devices" or "small devices" and not in the device type of "Small ITK devices"!

It follows that it is necessary to take a closer look at your products even though there is a conversion table.

Your Things to Do

- If this has not been done already, check your electric and electronic product ranges in detail in accordance with the conversion rules.
- If the proposed device type after conversion does not apply to your product, you will have to submit an application for a replacement or new registration for the correct device type by 15 November 2018.
- You have until 15 November 2018 to obtain a safety buffer by submitting an application for extension of this period (until 31 December 2018) if the existent registration is no longer correct after conversion.
- Take note: when registering a new device type, it can be necessary to increase the guarantee!

New Products under ElektroG - Now include Santa Claus bonnets too!

Products that were not covered by ElektroG before 15 August 2018 became subject to registration then. Here are some examples:

- Illuminated cabinets
- Electrically adjustable TV or massaging easy chairs
- Safe with electronic combination lock
- Bathroom mirror with integrated illumination
- Shoes with integrated blinking lights
- Santa Claus bonnets with little LED stars, etc.

Whether a product is an end device that is subject to registration depends on whether the electric/electronic component is bound in its function or its construction to the useful life of the overall product. That is, it depends, for example, on whether then integrated illumination is built in or can be replaced with little effort and purchased separately (e.g. LED strip).

These products may be sold only if they are labelled accordingly and registered (applicable since 15 August 2018).

What do you have to do?

- **If you are already registered with ear:**

Check whether your previously registered device types are sufficient to cover your new products. If not, then submit a new application for registration without delay. These products cannot be resold until you receive notice of registration with ear.

- **If you are not already registered with ear:**

Then you must immediately submit an application for registration of your products and assignment of a WEEE registration number. This requires that you provide a guarantee and arrange for proper disposal of electronic waste. The website of the ear foundation provides [assistance](#) with this for manufacturers and distributors.

Any questions?

Of course, you may turn to us at once with your questions. Avail yourself of our competence and many years of experience when fulfilling your responsibilities under product law. We would be glad to assist you with all questions that pertain to ElektroG.

asseso. Competence in Product Compliance

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