

PARTIAL REGULATORY IMPACT ASSESSMENT ON THE PROPOSED ENVIRONMENT AGENCIES FEES (WEEE FEES) FOR IMPLEMENTATION IN THE UK OF DIRECTIVE 2002/96/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ON WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT (“WEEE DIRECTIVE”).

2. Purpose and intended effect of the measure

The objective

1. The Waste Electrical and Electronic Equipment Regulations are due to come into force in January 2006. The European Commission has identified Waste from Electrical and Electronic Equipment (WEEE) as a priority waste stream: it is growing faster than other forms of waste and it contains certain hazardous substances which, following disposal, can have a disproportionately negative impact on human health and the environment.¹
2. The WEEE Directive² aims at prevention of WEEE and its reuse, recycling and recovery, so as to reduce the disposal of this type of waste. The Directive also seeks to improve the environmental performance of all operators involved in the life cycle of electrical and electronic equipment (EEE), and particularly those involved with WEEE.
3. This partial Regulatory Impact Assessment (RIA) accompanies the public consultation on proposed Agencies fees. The RIA discusses the potential costs and benefits arising from the proposed Environment Agencies’ fees, to UK businesses, charities and the voluntary sector.

The background

4. The WEEE Directive requires that from 13 August 2005, producers of EEE should provide for the financing of the collection, treatment, recovery, and environmentally sound disposal of WEEE from private households deposited at collection facilities. For products put on the market after 13 August 2005 (so called ‘new’ WEEE), the Directive says that producers should be responsible for financing the waste relating to their own products. WEEE from products put on the market before 13 August 2005 (so called ‘historic waste’) is to be financed by producers existing on the market when the costs occur.
5. In implementing the Directive, the UK Government must ensure that an “adequate network” exists for final holders to deposit WEEE free of charge. It must also demonstrate that this separately collected WEEE has been treated in accordance with the Directive and achieves the specified rates of recovery.
6. The UK Government has issued 3 consultation documents, and engaged in further consultation with industry parties, on the wider WEEE implementation

¹ In relation to the volume of waste discarded.

² Directive of the European Council and Parliament (2002/95/EC) of 27 January 2003

issues. The consultation accompanying this RIA focuses on the potential costs and benefits arising from the proposed Environment Agencies fees, to UK businesses, charities and the voluntary sector.

7. It is proposed that the Environment Agencies register producers of Electrical & Electronic Equipment (EEE). The Environment Agencies' registration activities will incur a cost recovery fee on registered producers. The Environment Agencies role will complement their existing activities as well as other WEEE related responsibilities intended under the implementing Regulations.
8. Producers are those businesses that manufacture, import or sell EEE under their own brand. Producers will be obliged to recover and recycle specified proportions of total separately collected household WEEE arisings, as well as non-household WEEE on a "like-for-like" basis. It is proposed that producers register with the Environment Agencies and discharge these obligations themselves, or, join an Agency registered compliance scheme that will discharge this obligation on their behalf.
9. Following the previous consultation on the draft Regulations and non-statutory Guidance, the Government has been reviewing its approach to the arrangements for approval of a distributor (i.e. retailer) compliance scheme or schemes. The Government's intention is now for a scheme proposal, including detailed proposals for supporting a collection network, to be subject to approval by the Secretary of State for Trade and Industry. The practical enforcement of distributor obligations generally is being considered further; in particular whether the Department of Trade and Industry should be the enforcement authority.

Risk Assessment

10. The WEEE Directive generally will lead to a reduction in the risks, both to human health and the environment, associated with current methods of disposal of WEEE.
11. The proposed cost recovery fees for the registration body will facilitate the administration associated with a data collection and monitoring service. The absence of a credible administrative body to register and monitor data reporting would jeopardise the implementation of the WEEE Directive.
12. Two particular consequences are likely to ensue in the absence of a data reporting service:
 - a. Registration is helpful as a disincentive to "free ride", and since registration will be mandatory for obligated business the enforcement body will have the registration database at its disposal.
 - b. The existence of an adequate and timely data reporting service is necessary for the purposes of calculating market share based obligations.

13. Registration and monitoring helps to provide a level playing field for obligated parties. A level playing field helps provide an incentive for compliance with the regulations, and reduces the benefits of free riding.
14. Currently, no definitive database of producers obligated under WEEE Directive exists. Estimates of obligated producers range from approximately 3,000 to 25,000. Hence, the obligation on producers within the scope of the Directive to register plays an important role in the implementation of the Regulations.

3. Options

15. The 3rd public consultation which focused on the National Clearing House (NCH) approach to WEEE implementation in the UK raised a number of important and fundamental questions about the practical operations of an NCH in the UK. For this reason the Government has been working actively with the full range of stakeholders to retain the best elements of the NCH approach whilst streamlining the system as much as possible to enable all obligated parties to be able to cost-effectively discharge their obligations.
16. As a result, the Government has had to re-visit some fundamental issues, and consider some additional challenges, raised by the responses to the 3rd consultation on implementation of the WEEE Directive in the UK. This is a benefit of open and extensive consultation.
17. The Government proposes an approach split between the Department of Trade and Industry (DTI) and the Environment Agencies. The DTI will undertake the market share based WEEE allocation for producers. The Environment Agencies will register and monitor obligated producers. The approach aims to facilitate a streamlined WEEE infrastructure, and enable parties to discharge their obligations cost-effectively. The proposed system offers synergies from the Environment Agencies experience and proven ability to provide a registration and monitoring service on a cost recovery.
18. Not implementing the producer registration aspect of the Directive risks the costs of infraction by the EU Commission, as well as a badly functioning WEEE Producer Responsibility system.

4. Benefits

Economic

19. The primary benefits of the WEEE Directive are likely to be environmental, which are discussed below. Some of these benefits may lead to economic benefits, in terms of increases in productivity due to possible benefits to human health, but these are very difficult to quantify. Other wider macroeconomic effects of the Directive are very hard to predict and will be heavily dependent on the price elasticity of demand for EEE products. The

European Commission's Explanatory Memorandum³ on the WEEE Directive suggested that any macroeconomic effects would be relatively limited.

20. Funding the costs of WEEE regulation through cost recovery fees paid by registered producers provides a more economically efficient means than funding through general taxation. A cost-effective service provision fee charged directly to producers becomes part of Electrical and Electronic Equipment (EEE) producers' production costs. The level of Environment Agencies' fees on any one organisation are likely to be negligible given their size relative to the production costs of even a small EEE producer.
21. The Environment Agencies' cost recovery fees are to cover the administrative service of data collection and monitoring. The absence of a credible entity to register and monitor data reporting would present a significant obstacle to implementation of the WEEE Directive. Not implementing the Directive risks the costs of infraction by the EU Commission.
22. Further, the consequences of not having a credible registration and data monitoring entity will lead to excessive "free riding", and a lack of data for the calculation of market share based obligations. Credible registration and monitoring assists in providing a level financial playing field for obligated parties. A level playing field helps provide an incentive for participation in the system, and reduces the potential for free riding.
23. The Environment Agencies have extensive experience in the field of registration, data monitoring and enforcement. Indeed, there are potentially significant synergies available to the Environment Agencies between their proposed WEEE related services, (registration, monitoring and enforcement), and their current activities. These predominantly human resource type synergies should result in significant implementation cost savings. Since the Environment Agencies will carry out the proposed registration and monitoring service on a cost recovery basis, obligated parties stand to benefit significantly from these synergies, relative to another entity carrying out the activities.
24. Charities and the voluntary sector should not face any higher costs or barriers resulting from the proposed fee levels or structure. Any change in reprocessor costs (i.e. the setting of fees) would have the potential to be passed onto the charity and voluntary sectors. However, the proposed fees do not affect reprocessors direct costs, as the administrative costs of monitoring reprocessing plants are to be incorporated into the producer fee.

Environmental

25. The absence of the Environment Agencies registering and monitoring data reporting would present a significant obstacle to implementation of the WEEE Directive. The WEEE Directive will contribute to the Government's

³ Commission of the European Union, *Proposal for a Directive of the European Parliament and of the Council on Waste Electrical and Electronic Equipment – Explanatory Memorandum*, 13.6.2000.

sustainable development objectives, and to its objectives on waste as set out in the various *Waste Strategies*.⁴ The benefits, which are discussed in detail in the partial RIA that accompanied the first consultation, include reductions in the amount of waste going to landfill, which is consistent with the Government's wider waste objectives and with the aims of the Landfill Directive. They will also include improvements to air quality, contributions to reductions in disamenity, contributions to resource productivity, and positive impacts in terms of raising awareness amongst businesses and consumers in relation to waste more generally.

26. The WEEE Directive will lead to a reduction in the risks, both to human health and the environment, associated with current methods of disposal of WEEE. The environmental benefits of the WEEE Directive are likely to be long-term in nature.
27. Further, the consequences of not having a credible registration and data monitoring system will probably lead to increased numbers of obligated parties "free riding". The environmental impact of free riding, in a scenario without a credible registration and data monitoring system, is likely to be a much-reduced level of recycling and reuse.

Social

28. WEEE fees do not directly impact on social issues. Indirectly however WEEE fees may contribute to increased separate collection. Increased WEEE collection rates may lead to benefits in terms of social inclusion in two ways. First, there is the potential for an increase in the reuse of WEEE. This could result in second-hand EEE being made available to lower income groups. In addition, there may be additional opportunities for charities or voluntary organisations to provide training, for example for the long-term unemployed. Secondly, increased separate collection may lead to less fly-tipping of WEEE, which would result in improvements in terms of visual disamenity, particularly in areas that have experienced disproportionate levels of fly-tipping in the past. In addition, separate collection of WEEE may have benefits in terms of increased awareness of waste in general.

5. Costs

Economic

29. The partial RIA produced for the 3rd public consultation outlined estimates of costs of obligations under particular Articles of the WEEE Directive. This RIA details the proposed Environment Agencies fees.
30. Under the proposed regulations producers will be required to register either individually with an Environment Agency or to join a compliance scheme that will register with the Agency on their behalf. The charges cover the estimated

⁴ *Waste Strategy 2000*, Part 1 and Part 2, Cm 4693-1, Cm 4693-2; *National Waste Strategy: Scotland*, ISBN 1-901322-13-2; *Northern Ireland Waste Management Strategy*, March 2000, ISBN 0-37-08386-X.

cost of the regulatory effort required in registration and compliance. Enforcement is not covered by charges. Activities the Environment Agencies will be required to undertake are:

- a. Registration of obligated producers and schemes
 - b. Monitoring of compliance with the regulations by producers and schemes (including reprocesses & exporters).
 - c. Enforcement.
31. Whilst there are still some uncertainties regarding the detail of what activities will be required from the Agencies, reasonable and cautious assumptions of activity level have been included in the cost model. In building the Environment Agencies cost model the packaging producer responsibility business model has been used as the basis for the regulatory effort calculations and assumptions.
32. The Government has examined estimates of the number of producers obligated under the WEEE Directive, which range from 3,000 to 25,000. A reasonable forecast of the estimated number of producers registering is required for cost recovery modelling.
33. The Scottish Environmental Protection Agency (SEPA) undertook a survey of the number of producers, and assume that 300 producers are likely to register in Scotland. If this estimate is grossed up we arrive at 3,000 producers for the UK⁵.
34. The Annual Business Inquiry (ABI) conducted by ONS reports using the Standard Industrial Classification (SIC) format. Electrical & Electronic Equipment (EEE) is not explicitly included in SIC codes. Therefore assumptions have to be made about the fit of certain SIC groups to the definition of EEE⁶. This produces a maximum estimate of approximately 25,000 producers. For regulatory purposes the estimate of 25,000 is considered to be unachievable in the first year.
35. The Applegate business directory⁷ contains the details of more than 9,000 electronics businesses in the UK and Ireland. The activities of companies listed here range from manufacturing to distribution. There is no legal obligation for electronics firms and suppliers to register with this directory.
36. The Environment Agencies consider an estimate of 7,000 producers to be reasonable for cost modelling purposes. This estimate used since the size of the variation in different estimates of producers is significantly large. In addition, further evidence⁸ combined with the experience of the packaging producer responsibility obligations suggests that SIC codes over-estimate the

⁵ Presuming Scotland represents 10% of the UK.

⁶ The Following SIC groups are assumed: 29.24, 29.4, 29.5, 29.71, 30, 31.1, 31.2, 31.5, 31.6, 32, 33.1, 33.20/1, 33.30/1, 33.40/3, 33.5, 36.3, 36.4, 36.5. Annex 1B of Directive 2002/96/EC (WEEE) is used as a basis. See ANNEX to RIA for further detail

⁷ <http://www.electronics.org.uk/indexes/company/electronics-index.htm>

⁸ See Annex 1

number of parties that will register. The probability for lower registration than forecast (when using SIC based estimates) would have significant implications for cost recovery.

37. As outlined in the consultation document a number of retailers have called for the Government to register retailers who sell EEE within the scope of the WEEE Directive. The British Retail Consortium (BRC) estimates that there are over 300,000 retail outlets in the UK. Not all of these will sell EEE. The Environment Agencies have assumed 250,000 retail outlets may need to be registered, and have estimated a cost of £14 per retail outlet for registering and monitoring retail outlets. This would mean a total cost to retailers of some £3.5 million per annum.
38. In terms of retailer compliance scheme(s), the Environment Agencies propose an annual fee of £12,265 per scheme. This fee is for registering and monitoring retailer compliance scheme(s), and will cover the costs incurred by the Agencies in respect of: ensuring additional DCFs are added to listings; cross checking with compliance scheme(s) on current status of membership; plus general liaison with the scheme(s) over guidance on issues such as promotion of alternative options to in-store take back.

Cost Model

39. The cost model, uses the Environment Agency (England and Wales) as an example, and assumes three producer compliance schemes, and that 700 or 10% of producers will register individually, while the remaining 6,300 or 90% of producers join one of the three (assumed) compliance schemes. Full year costs to the Environment Agency of implementing the WEEE Producer Responsibility Regulations are estimated as £2.9m.
40. The £2.9m costs include the direct costs of the front-line staff together with a proportionate amount of indirect costs to contribute to e.g. finance, personnel, legal, and corporate Head Office. Policy and process management costs for this area of work have been included as fixed costs and proportionally allocated across the direct costs.
41. The fixed costs (policy and process and IT) will be fully recovered if 7000 producers register or join one of three schemes.
42. Planned monitoring and compliance activities will use 73% of the front-line full-time employees time.

Table 2: Breakdown of Expected Costs

Regulatory Activity	Total costs estimated for 2006/07⁶
Directly registered producers ¹	£388,405
Producer Scheme set up and Maintenance ²	£33,305
Producer scheme member ³	£1,931,340
Reprocessors ⁴	£147,296
Exporters ⁴	£147,296
Estimate of annual cost of IT development and maintenance ⁵	£272,230
Total	£2,919,872

Notes:

1. Includes direct effort of registration and data checking; targeted visits to 15% registered producers; monitoring of certificates of compliance; proportion of cost of data analysis and reporting and non-household compliance. Assumes 10% of producers will register directly with the Agencies.
2. Includes direct effort of registration of the scheme including assessment of the operational plan; annual compliance visit to each scheme; assessment of certificates of compliance.
3. Includes direct effort of receipt of data; targeted visits to 15% scheme members; proportion of cost of data analysis and reporting and non-household compliance. Assumes 90% of producers will join a scheme.
4. Assessment of recycling operation being undertaken and two monitoring visits per year. Assumed 100 re-processors and 100 exporters.
5. Final decision still to be made on how registration will be handled. This amount is included to cover write down and rate of return over five years of database development plus annual maintenance.
6. Most of the first year regulatory effort will be required in the 2006/07 financial year. Therefore costs have been estimated as for 2006/07 prices. (A net increase of 2.5% of increase in costs minus efficiencies was approved for other Agency charges from April 2005. A similar increase has been assumed from April 2006.)

Charge Structure

43. The charges (shown below) are structured so that broadly the charge for each charge-payer recovers the regulatory effort spent on them or on their behalf. The costs have been allocated against the three charges described below.

For:

- a. Producers wishing to register directly with the Agencies
 - b. Initial approval and/or annual maintenance of compliance schemes.
 - c. Each scheme member payable by the scheme on behalf of their members.
44. The charge structure differs from the Packaging Producer Responsibility charging model in two significant areas:
- a. In packaging the re-processors and exporters pay a charge directly rather than the cost being included in producers fees.
 - b. In packaging the charge for set-up of the schemes is included in the scheme member charge rather than as a separate amount. The intention in WEEE is to prevent the establishment of schemes with very few members. This is discussed in more detail in the economic benefits section.

Table 3: Annual Registration Charges

Charge 1 – Individually registered producers

Total Charge and sub-components	Total Cost (£)	Total Cost 100%	Charge per producer (rounded to nearest £5)	Expected number of charge-payers	Total income
Producer registration, data handling and compliance	£480,167	94%	£686		
Monitoring of re-processors and exporters	£29,459	6%	£42		
Total charge for individual registration	£509,626	100%	£730	7000	£511,000

Charge 2 – compliance scheme approval and annual maintenance

Total Charge and sub-components	Total Cost		Charge per producer	Expected number of charge-payers	Total income
Producer Scheme set up and/or annual maintenance	£36,795		£12,265	3	£36,795

Charge 3 – for each scheme member

Total Charge and sub-components	Total Cost	Total Cost 100%	Charge per producer (rounded to nearest £5)	Expected number of charge-payers	Total income
Receipt of data on and compliance of each scheme member	£2,108,318	89%	£335		
Monitoring of re-processors and exporters	£265,178	11%	£42		

Total charge for producer scheme members *	£2,373,496	100%	£380	6300	£2,394,000
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* Note

These are the charges which it is proposed to incorporate in the Regulations

Environmental

45. The environmental costs of implementing the Directive relate to the environmental impacts associated with the separate collection and reprocessing of WEEE, in particular, for example, in relation to the negative impacts from any additional transportation that is required. At this stage it is very difficult to quantify these environmental impacts given the uncertainties about the size of the waste stream and the methods of collection.

Social

46. It is not anticipated that there will be any social costs of implementing the WEEE Directive or the proposed WEEE fees, but we will continue to monitor this prior to implementation.

6. Equity and Fairness

47. The environmental benefits of the Directive are expected to fall broadly equally across different economic and social classes and across different geographical regions in the UK.
48. The Environment Agencies fees are set at the same level irrespective of the producer's size. In setting the level of fees, it has been noted that there may be potential for the Environment Agencies to incur differing levels of costs for monitoring compliance of larger businesses, relative to smaller businesses. However, adjusting fees in proportion to organisational size or market share would involve an additional administrative burden for the Agencies. These potential extra administrative costs have to be passed onto producers in the form of higher total fees. Given that the nature of the costs incurred by the Environment Agencies is not anticipated to vary significantly in relation to firm size, and that the fees are relatively low in relation to even a small firms factor production costs, the fees are set irrespective of firm size.

7, Consultation with small business: the Small Firms Impact Test

49. The Government's three consultations on the WEEE Directive have produced around 800 responses, many of these from small firms and their representative bodies.
50. The WEEE Directive provides no exemptions for SMEs from the obligations of the Directive. However, the Government is sensitive to the particular requirements of SMEs as they seek to discharge their obligations under the

WEEE Directive in a cost-effective manner. See Section 6 on Equity and Fairness of WEEE fees specifically.

8. Competition Assessment

EEE Producers

51. The WEEE Directive is a wide-ranging and complex Directive that does not enable a straightforward assessment of its potential implications for competition in the UK to be made. However, applying the Cabinet Office Regulatory Impact Unit's (RIU) Competition Filter suggests the following for all the different allocation methods:
- a. In terms of both producers and distributors of EEE there appears to be significant competition in the UK, particularly given the level of imports and the range of selling techniques;
 - b. The costs of the Directive will fall on producers and distributors in relation to the amount of goods they put on the market;
 - c. New firms are unlikely to be affected differently by the Directive compared to existing firms;
 - d. The market for EEE is characterised by rapid technological change;
 - e. The ability of firms to sell the type of products they want is unlikely to be significantly restricted by the Directive or the proposed level of WEEE fees.
52. The fees and their structure do not present any significant barriers to competition between EEE producers. They allow for both registration through compliance schemes and individual registration.

WEEE treatment and reprocessing facilities

53. There are few existing companies in this sector as WEEE is not currently treated to the levels required by the Directive. There are however some companies that carry out similar functions to those required by the Directive. The government proposes that the costs for monitoring of re-processors (i.e. recovery and recycling activities) are covered in the producer registration fees. This will reduce administrative complexity and hence overall cost. Treatment facilities will be licensed in accordance with Article 6 of the WEEE Directive. The Agencies will recover costs via the licensing fee not via the producer registration fee for treatment facilities.

Compliance schemes

54. The nature of the costs faced by companies offering compliance services⁹ are likely to lend themselves to larger organisations. This may lead to a degree of concentration in the market for compliance organisations.

⁹ High fixed costs and relatively low marginal costs.

55. Whilst levels of market concentration are indicators of competition¹⁰ they do not necessarily in themselves mean that competition is insufficient. In the case of compliance organisations that are run by producers and funded by producers, they also have a clear incentive to recycle WEEE at least cost to their members.
56. The method of allocation may affect the market structure of the compliance organisations though the compliance organisation will be carrying out similar activities, irrespective of the method of allocation. In terms of the size of the compliance organisations, there may be similar issues as have already been discussed for WEEE treatment facilities.
57. The proposed WEEE charging structure is such that there will be a separate charge for set-up of compliance schemes, rather than including it in the scheme member charge. The purpose is to prevent the establishment of financially more risky schemes with very few members. In discouraging such compliance schemes the Government aims to reduce substantially the potential frequency of compliance scheme financial failure. Compliance scheme financial failure poses potentially significant disruption to the clearance of separately collected WEEE, and the wider discharge of the collective WEEE Producer Responsibility Obligations.

Companies that recover materials or energy from WEEE

58. The proposed fee levels and structure is unlikely to affect companies that recover materials or energy from WEEE.

12. Summary and Recommendation

59. The regulations propose that producers will be required to register either individually with the Environment Agencies or to join a compliance scheme that will register on their behalf.
60. Activities the Agencies will be required to undertake are:
- a. Registration of obligated producers and schemes.
 - b. Monitoring of compliance with the regulations by producers and schemes.
 - c. Enforcement
61. The charges are calculated to fully cover the cost of the regulatory effort required in registration and compliance. Enforcement is not covered by charges.
62. Total costs to be recovered by the Environment Agencies from registered EEE producers are, £2,919,872 in the first year of operation. Costs are likely to increase at a rate similar to general price inflation in the following years. It is

¹⁰ See *Guidelines for competition assessment: A guide for policy makers completing Regulatory Impact Assessments*, Office of Fair Trading, (OFT355), February 2002.

likely that the costs and fees will be reviewed after the first period of operation.

63. The benefits of the WEEE Directive and the fees proposed in the consultation are primarily environmental ones. The environmental and economic benefits are not easily quantifiable.
64. Registration of EEE producers is required by the Directive, not doing so would risk the financial penalties of infraction. Further, the absence of a registration system such as the one proposed would almost certainly jeopardise the functioning of the WEEE Producer Responsibility Obligations. Credible registration and monitoring assists in providing a level financial playing field for obligated parties. A level playing field helps provide an incentive for participation in the Producer Responsibility system.

ANNEX 1

SIC data are constructed on the basis of the main activity (principally in terms of gross value added, GVA) of the organisation in question. Organisations covered by the sampling frame (IDBR) are those with VAT records. Data is collected under the auspices of the 1947 Statistics of Trade Act. Where companies are selected for survey they are compelled to respond.

The DTI Electronics Innovation and Growth Team in the Electronics 2015 report, recently published, air the following view on electronics industry SIC codes:

Figure 2.

Better measurement

According to EIGT interviews, few companies take SIC codes seriously and there is little effort or incentive within companies to ensure that statistical returns are correctly targeted. This has led to enormous anomalies. Measurement matters, and without reliable and timely data companies can be lulled into a sense of complacency about their performance, and Government and RDAs will make wrong decisions on issues that affect the industry. Considering that a major international review of SIC codes is to take effect from 2007, the EIGT recommends:

3.2: The DTI, ONS and the UK Electronics Alliance must take the opportunity of the international review of SIC codes to devise and press for a more relevant structure.

A test of success will be the ease with which companies can accurately and easily assign themselves.

UK importers of EEE are not listed in a separate SIC code. Instead they are aggregated with other forms of wholesale activity, as below:

51.43	Wholesale of electrical household appliances and radio and television goods
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A snapshot from the SIC index below confirms that importers are included in the 51.43 code. However, they are aggregated with further categories.

Figure 3.

Indexes to the UK Standard Industrial Classification of Economic Activities 2003		
Alphabetical and Numerical Index		
SIC 2003	SIC 80	Activity
92.20/1	9741	Radio studio
51.43/9	6150	Radio, television and electrical household equipment n.e.c. exporter (wholesale)
51.43/9	6150	Radio, television and electrical household goods n.e.c. importer (wholesale)