

# 3.0 Reuse



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**Audience:** This section of the guidance document is of interest to local authorities, third sector reuse organisations and producer compliance schemes.

**Benefits:** The benefits of increasing the quantity of WEEE for reuse is to deliver a waste strategy in line with the waste hierarchy and the BIS Code of Practice, and to support local reuse organisations which provide wider environmental, social and economic benefits to the area, and save on disposal costs. The reuse organisations will benefit by ensuring they are given access to a greater amount of potentially reusable WEEE and influencing the type and quality of items that are segregated to meet the demands of their clients and customers. The benefit to the producer compliance scheme is to develop arrangements with approved reuse organisations, thereby ensuring WEEE stays within the WEEE system. Producers are very keen for reuse to occur as long as the material is treated through approved routes.

**Summary:** Raising awareness of the local reuse facilities and organisations, and working in partnership with them to ensure the correct type and quality of items are segregated will be key to maximising reuse. Reuse can be part of a commercial organisation or can be an activity carried out by a third sector organisation.

Reuse means any operation by which whole items of equipment or parts or components that are not waste are used again for the same purpose for which they were conceived.

Good practice advice is provided on how to ensure quality of WEEE items that are segregated for reuse, how to liaise with different stakeholders to ensure they all realise their benefits as mentioned above and how reuse can be managed at HWRCs. Further industry led guidance is currently being developed to look at reuse and how this can be delivered in the most effective way.

#### Good practice

Wherever possible, reuse should be encouraged as per the waste hierarchy and the BIS Code of Practice. Priority should be given to the reuse of whole appliances.

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The Code of Practice also mentions that all organisations undertaking reuse need to be made aware of their responsibility to ensure that “reused EEE” meets the relevant safety and technical standards and that preference is given to the local voluntary or community sector.

Reuse will be successful if there is early intervention to segregate quality items. Several stakeholders have a part to play in maximising reuse, including:

- **Producer Compliance Schemes** – allow for reuse in their partnership agreements with local authorities and ensure hauliers are able to protect items as necessary during transit.
- **Local authorities** – promote all reuse options to residents (and businesses) and segregate potentially reusable items from bulky waste collections and at HWRCs.
- **Consumers** – householders and businesses segregate items for reuse and purchase reconditioned and refurbished goods.

### 3.1 Liaison with PCS

The relationship between the local reuse scheme and the HWRC should be a ‘win win’ situation, with maximum diversion of quality items out of the waste stream to be passed on for reuse, i.e. a reduction in waste and an increase in reusable items for the reuse organisation.

The PCS needs to ensure compliance for their members therefore some information needs to be provided to the PCS if WEEE is to be removed from an HWRC for reuse, including:

- AATF Permit number or if not directly approved, name and permit number of AATF the reuse organisation is associated with (i.e. who will issue the evidence to the PCS?);
- number of items removed from site, refurbished/ reused;
- tonnage of items removed from site, tonnes reused, and any subsequent WEEE recycled<sup>1</sup>; and
- destination of items to ensure that correct routes are being used and to prevent double counting if sent from one AATF to another.

A PCS cannot have evidence from “non-obligated WEEE” items that are reused, however non-obligated WEEE should still be treated through legitimate reuse routes that apply reuse standards.

When deriving tonnage it is good practice to weigh items over a calibrated weighbridge or scales where available. If this is not practicable, it is good practice to count the items and then apply ‘item to weight’ ratios in order to derive overall weights. A commonly used average weight list has been developed by the Furniture Reuse Network and can be downloaded [here](#).



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<sup>1</sup> If a reuse organisation cannot reuse an item, it should be passed to an ATF and only the tonnage received reported (ATFs do not report on any residual waste). But if the reuse operator is an AATF – they can issue “evidence” on the recycled element – and MUST ascertain the recycling efficiency of the ATF or AE used. Information is available in the Treatment guidance report.

### 3.2 Ensuring quality of items for reuse

Early intervention of items suitable for reuse is key to protect the integrity of WEEE items.

#### Through communications

Effective communication is important to raise awareness of the quality requirements for WEEE that is to be reused. Clear guidance on what is acceptable is required.

- local authority bulky waste and HWRC web pages can provide messages on how and where to find approved reuse operators in the area, this could also include Freecycle etc;
- if specific reuse groups are to be mentioned, this should be agreed in advance;
- advice on the quality and type of items the organisations are able to accept should be included.

#### Through bulky waste collections

If WEEE items are to be collected by bulky waste collection crews it is good practice for call centre staff to identify whether the item is currently working and cosmetically sound (not dented or scratched, is intact etc) and if the householder is happy for it to be reused. If positive, ask if the item can be kept inside until collection. Advice on call centre scripts regarding reuse can be found in Collections at Designated Collection Facilities **section 4**.

Items that have been identified as potentially reusable should be protected to avoid damage that would inhibit their reuse. It is therefore a good idea to identify reusable WEEE at the point of collection e.g. with an appropriate label and handle them with care and protect from damage, householders could be asked to put a label on items or this could be done on collection.

It is good practice to collect items identified for reuse on an appointment basis from inside the home. This means the item is not damaged by weather and it can be covered in protective packaging before being moved. An alternative suggestion is for the householder to bring the item to the door or ground floor access point thereby protecting the item until it becomes the responsibility of the local authority.

#### At the HWRC

Potentially reusable items need to be segregated under cover to protect them from the weather.

Items should not be stacked if potentially reusable. If items do need to be placed on top of each other because of space restrictions, protective packaging should be used. Further information on identifying WEEE for reuse can be found in *Collections at Designated Collection Facilities*, **section 7.3**.

#### From businesses

Businesses that produce WEEE can interact with local (commercial or voluntary) reuse schemes to maximise reuse. These organisations may be asset management companies or other reuse organisations.

Businesses should ensure they meet their duty of care and only contract a legitimate organisation. Advice for businesses is available in *End User Business*, **section 9**.



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### 3.3 Regulatory and other requirements

There are exemptions from environmental permitting and waste management licensing regulations for reuse activities.

There are a number of regulatory and other issues that the local authority, reuse organisation and site operator need to be aware of if reuse activities are to take place on a HWRC, including:

- planning legislation;
- site licence/ environmental permit conditions;
- duty of care;
- trading standards;
- safety of electrical goods, including PAT testing; and
- functionality testing i.e. is it fit for its original purpose.

### 3.4 Securing and storing items for reuse

Early liaison with the appropriate authority (Local Authority and Environment Agency) is recommended.

The responsibility for security issues should be included in the contract between local authorities and site operators to ensure the potentially reusable items are protected as far as reasonably practical and in the event that vandalism does occur to the reuse container, it is clear who is responsible for the repair and financing of any damage.

Good practice options include implementing one or more of the following depending on the local circumstances and the security risk:

- store items in containers that can be locked<sup>2</sup>, or move items inside a lockable building overnight;
- ensure suitable fencing around the site (e.g. steel palisade fencing);
- lock the site gates at night;
- use CCTV;
- link CCTV or motion sensors to loudspeakers (that inform trespassers “this site is private property etc”) that are activated when motion is detected. This can be linked to a central security control room (which is expensive but may be more effective); and
- build a relationship with the local police to try and ensure quick response when CCTV captures live images.

<sup>2</sup> Padlocked containers may draw attention from trespassers and potentially results in damage as well as theft if they are determined to access the contents of the container. Local knowledge of the security risk and the cost of replacing or repairing containers should be considered when deciding whether to lock the containers.



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### 3.5 Judging demand

Only items for which there is demand should be segregated for reuse. It may be possible to salvage small WEEE items or old computer equipment; however it may not be environmentally or economically best practice if there is no reuse opportunity locally. Items should be separated based on their reuse potential.

The BIS WEEE Code of Practice suggests priority for reuse should be of whole appliances and preference given to local voluntary or community sector organisations.

It is good practice for local authorities to liaise with local reuse organisations before communicating to site operators what reusable items should be segregated at the HWRC or through bulky waste collections. There is also the potential for the reuse organisation to be directly involved in the collections.

Some refurbishers and asset management companies may be able to reuse items beyond the local area in which they operate. This may mean that items are transported throughout the country or exported overseas.

### 3.6 Interaction with local reuse schemes (DCF and kerbside)

Where possible all WEEE collected for reuse should go to a reuse AATF or ATF (see Treatment for Reuse, **section 5**).

Appointing a suitable organisation may require an official tendering process, service level agreement or other formal process. WRAP is preparing guidance on the procurement of bulky waste services.

It will be important for the 'reuse scheme' to be involved in deciding what items should be segregated as potentially reusable. The reuse organisation should provide advice to call centre staff and HWRC operatives regarding what is and what is not reusable.

Local authority call handlers will be the first point of contact for most residents and it will be essential for them to understand the needs of the reuse organisation. An example script and reuse identification checklist can be downloaded [here](#).

It is good practice for call handlers to visit the reuse organisation so they can see first hand the quality and type of items that are wanted, to observe the skilled staff and volunteers at work and to see what happens to items that are reusable and those that are not.

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## Reuse at HWRCs

HWRCs do not offer secure data removal therefore end users need to be made aware that it is their responsibility to ensure their data is removed before depositing the item onsite for recycling or reuse.

HWRC site staff should visit reuse facilities to see what happens to items once they have left site. This can provide motivation for staff to be more pro-active in maximising diversion for reuse.

Reuse could involve segregation for offsite testing and resale or onsite testing and resale. If onsite reuse activities occur, the reuse organisation and local authority must ensure they are compliant with all relevant health and safety and environmental regulations. The reuse organisation should be an approved treatment facility that can demonstrate the WEEE is treated appropriately, there is a proper audit trail and the WEEE evidence can be obtained. Consideration should be given to the liability of a seller of second-hand appliances in the event that the units were untested and subsequently found to be defective. Any arrangement should be made in consultation with all stakeholders.

The regulations do not currently require small reuse organisations that are selling WEEE at a HWRC to register as an ATF because of the size of the activity undertaken. However, it is a valid concern that some material is 'leaking' from the WEEE system through this route because it is not being counted and reported. It is therefore recommended that these reuse organisations are registered as an ATF. If this is not feasible, as a minimum, the reuse organisation should have reporting systems in place to account for and trace the items and sales. The organisation should take some onward responsibility for the item by labelling or marking it in some way. It is worth noting that, as the tracking of reuse becomes more important in future, it is likely that these organisations may come under pressure to register.

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All items entering a HWRC are waste and must either leave with a Duty of Care or Hazardous Waste Consignment note, or be treated and appropriate as second hand WEEE.

There are a number of options available for the management of a reuse facility on a HWRC:

- A reuse organisation could staff onsite facilities themselves, as they are best placed to identify the type, quality and quantity of reusable items their organisation can sell.
- Site staff can segregate potentially reusable WEEE with the support of the reuse organisation at the beginning and periodically to troubleshoot if contamination is occurring or if changes in the reuse market mean that demand has changed.

The PCS needs data from the reuse organisation to report the evidence to the Settlement Centre and to the local authorities and members.

The local authority will need to receive data from the reuse organisation in order to report reuse arisings to Defra's Waste Data Flow and to pay reuse credits to the reuse organisation if and where applicable.

As part of its Duty of Care the PCS and the local authority should be satisfied that the reuse organisation is carrying out its activities appropriately, for example repair and refurbishment, items in working order and evidence of sale.

Further information on the requirements of AATF and ATFs can be found in the Treatment Good Practice Guidance.



Reuse cabin at Seafield Community Recycling Centre, Edinburgh City Council

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