

3.0 Traceability & Management Systems



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Audience: This section will be of interest to all audiences, although it is of particular interest to organisations directly involved in the treatment and handling of WEEE. This section of the guidance is primarily aimed at organisations such as treatment facilities, reuse organisations and Approved Exporters (AE), which as part of their registration are obligated to collect and document a significant amount of data. It will also be useful for third parties interacting with these organisations as it will allow them to understand the type and nature of information they record and manage.

Benefits: The benefits of implementing the guidance discussed in this section are that it encourages better data management processes and improves traceability of WEEE as it flows through the system. It encourages organisations to identify exactly where their material ends up and what percentage is recycled.

Summary: This section of the guidance advises on setting up management systems and procedures to ensure treatment facilities have sound methods in place to record and manage all necessary data. It also discusses how treatment facilities can undertake audits and downstream checks to ensure they can identify exactly how their material is treated and where it ends up.

3.1 Company management systems

As required by the WEEE Amendment Regulations 2009, all approved facilities must keep records in order to provide quarterly reports of their activities¹. The records must be kept for a minimum of four years, and should be available to the appropriate authority, when required (electronically or hard copy). These records are also used by auditors to confirm the activities of the approved treatment sites, exporters and reuse organisations.

The records must include all WEEE categorised as B2C (business to consumer) or B2B (business to business) by category of WEEE and should differentiate between obligated and non-obligated WEEE (i.e. WEEE which is not attributed to a producer compliance scheme) arriving at the site. This would ensure that the treatment facilities are not treating non-obligated WEEE as obligated WEEE.

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¹ Source: http://www.environment-agency.gov.uk/static/documents/Business/WEEE_2009_amendments_factsheet_.pdf



In addition, records should also contain copies of evidence notes and relevant supporting information², including the:

- weight (tonnes) of WEEE received for treatment;
- weight (tonnes) of WEEE dispatched from site;
- weight of WEEE derived materials by stream that leads the AATF / ATF;
- weight (tonnes) of WEEE delivered to another AATF / ATF for treatment, including the name and address of the operator of that AATF / ATF and the address of the AATF / ATF where the treatment was carried out;
- weight (tonnes) of WEEE delivered to a reprocessor for recovery or recycling, including the name and address of the reprocessor and the address of the site where recovery or reprocessing was carried out; and
- weight (tonnes) of WEEE delivered to an AE for treatment, recovery or recycling outside the UK and the name and address of that exporter. Records should be kept along the treatment chain, for example, if metal goes to a metal treatment AATF in the UK for shredding but ends up being exported they must also use an AE.

The records that AEs should keep (categorised by B2B or B2C) include:

- the weight (tonnes) of whole WEEE and WEEE derived materials exported for treatment, recovery and recycling; and
- evidence that the amount of WEEE evidence issued is equivalent to the total WEEE exported.

Key benefit of taking action

Better recording of WEEE collection data on a site specific basis can help with monitoring and improvement schemes.

Good practice

Examples considered good practice in company management systems include, but are not limited to:

- implementing systems which are of a standard capable of achieving ISO 9001, which is the internationally recognised standard for internal quality management. This standard applies to the processes that create and control the products and services an organisation supplies. The benefit of achieving standards such as these is that it can be used to promote the organisation to potential clients;
- implementing electronic and hard copy systems for managing and recording processes and transactions. Electronic versions can be a useful way to manage and manipulate data, enable back-up copies to be made. However hard copies can also be used for back-up. Data can be entered incorrectly onto a computer, and in such cases, a hard copy can provide a useful reference;

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² More information is available at [Section 2]: http://www.environment-agency.gov.uk/static/documents/Business/audit_1963322.pdf



- implementing a management system to allow data and instructions to be provided on a site by site basis. For example, if there are particular issues with a given site, the operator can issue the driver with site specific instructions to help mitigate any problems. Also, collecting the data on a site by site basis helps the treatment facility monitor the sites to identify where any problems might arise, such as leakage; and
- setting up traceability procedures to allow for the identification of the flow of WEEE and ensure the end destinations are recorded.

EXAMPLE:

Viridor: Implementation of Management Systems

Viridor has a management system which has achieved ISO 9001 approval. They use an industry recognised data management system which allows them to book collections and provide site specific instructions. Hard copies are kept of all appropriate documents to back-up data entered into this system. Being able to issue advice and instructions on a site by site basis allows them to ensure that each site can receive a tailored service and allow for any issues to be resolved quickly.

The data management system allows Viridor to quickly access a wide range of detailed data in a format which can be utilised to meet a number of needs. The benefits of implementing a system such as this are that it allows the integration of several internal systems to provide them with immediate access to a wide range of information. This can be used for monitoring purposes or for strategic planning. It also records all WEEE by category (as well as obligated / non-obligated) and where they send their WEEE and WEEE derived materials.

They have also implemented systems for matching up the data from their data management system to incorporate protocols for LDAs and Small Mixed WEEE categories so that they can monitor the flow of equipment in and out of their facility. The system helps monitor the flow of material through their site and is useful for auditing purposes.

The benefits of using a system such as this are that it can allow for monitoring of material from each site. If there is a sudden decrease from a particular site they can bring it to the attention of the PCS or site operator and implement remedial action.

Although this is a comprehensive electronic system these types of systems can be replicated on a smaller scale using software such as Microsoft Excel or by using hard copy recording systems.



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3.2 Auditing and downstream checks

The WEEE Regulations state that in addition to quarterly reports, each AATF and AE that issue over 400 tonnes of evidence per annum must provide an Independent Audit Report to the relevant agency by the statutory deadline (end of May), in the year following the end of the approval period. However, PCS should consider undertaking audits where appropriate for organisations issuing less than 400 tonnes of evidence.

The WEEE Regulations require that all applicable AATF operators and AEs 'provide the Environment Agencies with a report from an independent auditor demonstrating that the amount of evidence issued in a compliance year is consistent with the amount of WEEE received or exported for treatment, recovery or reuse³'.

The report should demonstrate to the appropriate authority (Environment Agency, Scottish Environment Protection Agency, Northern Ireland Environment Agency) that the evidence notes issued by the AATF operator or the AE during a particular compliance period equate to the tonnage of WEEE received or exported for reuse, treatment, recovery or recycling over the same period.

The report should demonstrate:

- the AATF/AE correctly identified and quantified the tonnage of WEEE received, reused, treated, recovered and recycled, by category and by B2B / B2C and obligated / non-obligated;
- any protocols used were agreed with the relevant authority and were applied correctly. (Please see *Protocols section 6.53*);
- the total quantity of evidence issued was not more than the quantity of obligated household WEEE received for reuse or treatment;
- no double counting has occurred where WEEE has been handled by a number of AATFs or ATFs i.e. note who has handled WEEE and who will issue evidence;
- that evidence notes issued by an AE related only to WEEE exported for reuse as whole appliances;
- the AATF has supporting evidence from downstream ATFs, AATFs and AEs relating to any WEEE and WEEE derived materials that were sent on for further treatment, before final reprocessing and or disposal; and
- evidence of reuse of whole obligated household appliances has been backed up by appropriate records and recorded accurately on the evidence note.

Key benefit of taking action

Good internal auditing will help when random audits are performed directly by the relevant agency on a random basis to check that independent audit reports are consistent with their own finding.

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³ Available at: http://www.environment-agency.gov.uk/static/documents/1523_WEEE_Audit_position_final.pdf



Good practice

Activities which can be undertaken and are considered good practice for auditing include, but are not limited to:

- keeping records in an easily accessible and auditable format, such as in an electronic system where information can quickly be accessed. This can be a useful way to manage or manipulate data, enable back-up copies, however hard copies can be useful as back up copies;
- carrying out audits on downstream treatment facilities. This can help to demonstrate Duty of Care and ensures all facilities have the correct permits. The benefit of this is that it helps identify whether the facilities are achieving the recovery and recycling efficiencies claimed and also shows that the treatment facility can demonstrate that due diligence has been carried out as far as possible;
- recording of audit recommendations and monitoring the number implemented or not implemented and reasons why; and
- testing of systems to ensure that they are easy to use and can generate all of the relevant information required for an audit. The benefit of this is that it provides the organisation with the confidence that it can quickly access all necessary data and that it will be prepared for any audits.

3.3 Tracking WEEE and WEEE derived materials

WEEE & WEEE derived materials

Treatment facilities have a duty to trace the WEEE they treat. They should be able to record the obligated and non-obligated WEEE they receive. Non-obligated WEEE is the material received by an AATF or AE which is not associated with (or on behalf of) a compliance scheme.

From the 1st January 2010 AATFs / AEs are required to report the weights of WEEE as it passes through the treatment process. They are required to report what enters the facility by category and source. They must also record untreated WEEE leaving the site for further treatment by another facility.

Treatment facilities should either have an electronic tracking system or a hard copy version for tracing WEEE and WEEE derived materials. When a collection is organised each load can be allocated a job number, source, type, quantity of WEEE and whether it is household / non-household / obligated / non-obligated. It can then be logged onto the internal data management system.

When WEEE is sent on for further treatment it should be sent to another AATF, ATF or AE to ensure that the WEEE remains in the system and is eligible for raising evidence. Any WEEE (or WEEE derived material) that is not exported through an AE (either directly from the AATF, or via the downstream chain) counts as 0% recovery / recycling. However, procedurally, treatment facilities should always ensure that they are dealing with ATFs, AATF or AEs. A list of all AATF, ATFs and AEs is published by the relevant environmental agency (EA, SEPA and NIEA)⁴.

It should be noted however that WEEE derived materials such as metals and plastics may be sold outside the WEEE system for reprocessing.



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⁴ Environment Agency AATF register: <http://www.environment-agency.gov.uk/business/topics/waste/32086.aspx>
 SEPA AATF register: http://www.sepa.org.uk/waste/waste_regulation/producer_responsibility/weee/public_register.aspx
 NIEA AATF register: http://www.ni-environment.gov.uk/waste-home/public_reg.htm

By making these checks, AATFs can ensure that they are dealing with authorised facilities under the Regulations. However, in addition to this, it also helps the first AATF to gather relevant information on the actual amount of WEEE being reprocessed downstream, as well as helping to prevent 'double counting'; ensuring evidence is not raised twice on the same WEEE. It also helps AATFs keep their traceability procedure up to date.

Although treatment facilities are only required to state the onward facility to which they send their material, good practice could be considered to be performing due diligence checks (and even audits). These checks ensure that the organisation to which they send their material have all of the required registrations and legal documents in place. Material is then only sent to acceptable end markets. This gives the treatment facility the confidence that the material is being treated in a way which socially, environmentally and ethically reflects the ethos of the WEEE Regulations. It also enables them to fully trace the treatment of their material, identify the percentage of WEEE which is actually recycled and identify where the material ends up downstream from onward facilities.

However it should be noted that commercial sensitivities may exist and as such facilities may not want to divulge details of their end markets. When this occurs agreements should be put in place which protect the facility and their commercial interests.

WEEE for reuse

In addition to the above requirements, reuse AATFs will often trace items of WEEE which have the potential for reuse if refurbished. WEEE for reuse can be obligated and non-obligated, and can come from DCFs as well as other sources such as businesses. It should also be noted that a reuse organisation may not be an AATF in its own right, but will need to be associated with an AATF which will issue reuse evidence on its behalf.

Marking potential items suitable for reuse with some form of label to help trace the items as they flow through the testing and refurbishment process and onto end markets can be considered good practice. The label will typically contain information such as:

- unique identification number (either OEM number or reuse organisation number);
- source of item;
- treatment facility;
- details of the test(s) carried out;
- date test was completed & results; and
- manufacturer or brand name.

The implementation of a traceability system is crucial to prevent the loss of material from the WEEE system as it means the item can be tracked from the moment it is identified for reuse to its final destination. This system should extend not simply to whole appliances but also to components and parts.

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EXAMPLE:

AQUAFORCE Ltd: Minimise Downstream Reprocessors to ensure Monitoring and Control

AQUAFORCE is a small organisation, approved as an AATF, which source materials from DCFs and businesses. Their solution, to ensure traceability of their WEEE for reuse and derived materials, is to limit the downstream treatment facilities they use to a manageable number. By doing this, they can control and track the WEEE for reuse and derived materials they send for further treatment in the UK.

When contracting with a new downstream treatment facility, they request copies of the treatment facility's relevant licenses and provide them with an information sheet stating the conditions by which the treatment facility must operate if they want to treat their WEEE for reuse and derived materials.

They also request monthly reports from their downstream treatment facilities regarding the quantity of WEEE and derived materials recycled and information on further reprocessors and end markets.

The benefits of limiting the number of downstream treatment facilities they work with is that they can more easily monitor and control what happens to their WEEE for reuse and derived materials. In addition, it makes it feasible for AQUAFORCE to regularly visit and audit most if not all the treatment facilities they contract.

They also ensure that they produce quality end products and that they optimise the quantity and quality of WEEE derived materials they produce. Having fewer downstream contractors, AQUAFORCE has a greater control over the destination and treatment of their materials. The figure above shows a sample of their WEEE derived plastics.

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Key benefit of taking action

Monitoring labelled items can assist continuous improvement initiatives. If a particular item is regularly returned as faulty, the treatment facility can identify the tests conducted on them to identify where improvements can be made.

Good practice

Examples considered good practice for tracking WEEE for reuse and derived materials include, but are not limited to:

- demonstrating a mass balance of flow through the treatment facility by weighing in all whole WEEE and quantifying it when it leaves the premises. The benefit of this is that it helps monitor the treatment and recovery rates within the facility and can help identify and target where improvements can be made;
- adding a label or barcode to potential reuse items for traceability and data recording. This allows the treatment facility to record information such as waste license or exemption number, unique item identifying number and pass or fail date;
- operating a weighing system weighing WEEE for evidence raising and reporting purposes. If this is not practicable, items can be counted and then an 'item to weight' ratio can be used to derive overall weights. A commonly used average weight list has been developed by the Furniture Reuse Network and can be downloaded [here](#). Or visit www.frn.org.uk;
- recording obligated and non-obligated whole household WEEE separately to ensure that evidence is only raised on obligated whole WEEE (for reuse);
- issuing a letter/contract to downstream ATFs / AEs on how the treatment facility expects downstream operators to treat their WEEE for reuse and derived materials, including final destination routes;



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- requesting supporting evidence from downstream treatment facilities of the percentage of WEEE actually reused. This can help to ensure the accuracy of the reported level of WEEE reused;
- working with a manageable number of treatment and reuse organisations. This ensures that the treatment facility can implement traceability systems and conduct audits on every supply chain partner, ensuring that they are adopting treatment standards acceptable to them. It also helps treatment facilities monitor the final destination of their WEEE for reuse and derived materials. As stated previously, in these circumstances commercial sensitivities may exist and as such facilities may not want to divulge details of their end markets. When this occurs agreements should be put in place, which protect the facility and their commercial interests; and
- sending EEE to local reuse markets via certified organisations to ensure an auditable trail.

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