

# 4.0 Collections at Designated Collection Facilities



## Contents

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20



**Audience:** This section is primarily of interest to waste disposal authorities and their contractors.

**Benefits:** The benefit of implementing the guidance is to segregate a greater tonnage of WEEE at HWRCs for reuse and recycling, whilst taking account of the constraints of the site and other responsibilities of site staff.

**Summary:** This section focuses on how to increase the capture of WEEE at Designated Collection Facilities (DCF), primarily Household Waste Recycling Centres, and covers advice on access to containers, the size and location of containers, site signage and raising awareness, staff training and staff roles and responsibilities. It also considers how to identify reusable WEEE and handling both reusable and recyclable WEEE appropriately taking account of health and safety. The guidance considers how staff and site users can be encouraged to segregate WEEE whilst minimising contamination. Factors outside the WEEE system that will influence WEEE management onsite are taken into account. Other issues, such as contractual arrangements and liability, clearance methods and timings, and liaison with haulage contractors have also been included. Other useful sources of information are the BIS Code of Practice and various Health and Safety Executive guidance documents.

## 4.1 Factors that affect WEEE good practice at DCFs

If a local authority has nominated their HWRC to be a DCF they agree to abide by the BIS Code of Practice and they have a commitment to support the reuse and recycling of WEEE that enters their site to maximise diversion through appropriate channels.

Once a local authority has designated their HWRC as a DCF, they have made a commitment to make all WEEE available to the PCS (not just the low value items or those that cost a lot to dispose of).

The best method to maximise capture of WEEE at a DCF will depend on whether the items are to be reused or recycled.

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

There are a number of site-wide issues that will influence the collection of WEEE, such as:

- staff interaction with site users;
- size of containers and their location on site;
- site throughput;
- traffic controls; and
- availability of reuse facilities.

The location of the site may have an impact because the population of an area and the geography will affect the type and quantity of WEEE that is brought to site and therefore local authorities should look to similar authorities to identify good practice for their situation. Socioeconomic factors of an area are likely to affect the quality of WEEE that enters site.

The size and layout of a site will impact on the ability to segregate materials and may mean that a reduced number of WEEE groups are collected or WEEE containers are squeezed into unused areas of the site, meaning they are not visible to the public. The tonnage of WEEE collected may not be as high as sites with more space. Nevertheless small sites can still demonstrate good practice in a number of the areas discussed, e.g. staff interaction, signage and appropriate containers.

## 4.2 Staff interaction with site users

Staff interaction will improve segregation and lower contamination resulting in higher recycling and reuse rates.

Sites where there is less interaction with users will not maximise WEEE recycling and reuse, potentially resulting in WEEE not being correctly managed and tracked, or worse, disposed of to landfill.

There are a number of ways that staff can interact with site users:

**Greeter:** At the entrance to the site, staff can direct users to the appropriate bay/ container and advise them of the need to segregate their waste, dispose of hazardous waste appropriately and on the importance of excluding contamination. The greeter can also monitor van usage and potential trade waste abuse. Example: Edinburgh City HWRCs.

**Point of disposal:** Sites where staff are on hand to advise users of the correct container or bay to dispose of items generally have a higher recycling rate. It is not necessary for one staff member to be permanently based at the WEEE containers. Example: Nottingham City Council HWRC.

**Temporary WEEE staff:** Based on the assumption that most HWRC users visit at least once per year, a local authority can manage its costs by recruiting a dedicated temporary staff member to promote WEEE recycling services (e.g. through a one year contract). Example: West Sussex County Council HWRCs.

**Encouraging reuse:** Staffing of reuse containers will ideally be by a third party regardless of whether the items are treated onsite or offsite for resale. Alternatively, site staff can monitor the container (if there are adequate numbers of personnel onsite). Example: Warwickshire HWRCs.



Staff interaction, Stevenage HWRC

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

## 4.3 Containers

Adequately sized and easily accessible containers will support maximum diversion. Small bins hidden behind other containers will not maximise WEEE capture as users may be unaware the facility exists.

Whilst good site staff interaction is useful, there are other opportunities for sites to raise awareness of their WEEE facilities and that includes access to containers and the size and location of the containers. The more visible and easily accessible a container is, the easier it is for the public to use them.

If reuse is to occur at a DCF, early intervention is key to protect the item from potential damage. These items should be segregated as soon as possible into a covered container or shed. For all other items that are to be recycled, there are a number of factors to consider as discussed next.

### 4.3.1 Public access to containers

Site configuration, the type of container used and the ability to maximise the load and manage health and safety of site users and staff will help you decide whether the public may have direct access.

Different site operators will have a preference as to whether the public access all WEEE containers. Collections at Designated Collection Facilities **section 3.2** considers the container options.

### EXAMPLE:

At HWRCs in Cardiff, the public can dispose of their SMW, energy efficient bulbs and fluorescent tubes directly into the relevant containers and they can leave their cooling appliances in the designated area. The benefit of this option is that it leaves site staff available to fulfil other duties onsite.

However for some WEEE groups, site staff often prefer to load containers themselves, for example, stacking the display screen equipment themselves in the container (for health and safety reasons and to maximise the load).

### 4.3.2 Size of container

The tonnage of WEEE segregated is influenced by the size of the container and whether there is capacity within it.

### Maximising reuse

It is good practice for sites to endeavour to provide some sort of reuse facility however, this is not always possible. Many sites will not have sufficient space to accommodate reuse or the DCF operator may have decided that reuse cannot occur onsite. Where this is the case the DCF should look for opportunities to maximise recycling.



LDA and CRT containers that are loaded by site staff only, Stevenage HWRC, Hertfordshire.

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
<b>4.3 Containers</b>	<b>03</b>
<b>4.3.1 Public access to containers</b>	<b>03</b>
<b>4.3.2 Size of container</b>	<b>03</b>
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

To maximise reuse through DCFs it is recommended that sites have a large covered container or shed to house potentially reusable items. This is to ensure that reuse has maximum visibility and users are aware that reuse activity occurs onsite as well as providing a weatherproof and secure area. The space needed will depend on the activities that will be undertaken, for example storage only (prior to removal offsite) would require less space than storage, functionality testing and resale on site.

### EXAMPLE:

In Hertfordshire, the fluorescent tube containers have a tray on the top into which the public deposit their tubes and energy efficient light bulbs. The site staff will then periodically open the container and insert the tubes and bulbs. For the sites in Hertfordshire where LDA are collected separately, the site staff will stack these (and CRT) as the public do not gain access to the containers. One staff member will use a sack barrow, or two staff will handle an item to fill the container efficiently.

### EXAMPLE:

In West Sussex televisions and monitors are left on the ground by the public; one television is left on the floor at the beginning of the day to encourage the public to do the same. Site staff will periodically unlock the container and stack the screens. Similarly, as a 40 cubic yard skip is used for the collection of LDA at sites in West Sussex, the public are requested to leave their appliances in a designated area and the site staff will use site lifting equipment to move the items.

### Maximising recycling

When recycling WEEE at a DCF it is suggested that the site uses the largest appropriate containers that it can accommodate. The benefit of this is to increase visibility of the waste stream to the site users thereby helping to improve segregation and increase the tonnage recycled.

The size and type of container will differ for the five different WEEE groups and will be affected by the layout of the site. Additional guidance is available in **section 4.3.5**.

Container size needs to take account of how the container is to be filled and whether there should be public access or not.

Other considerations when identifying the appropriate sizes of containers are:

- the site licensing or permitting requirements (i.e. some site licences require covered containers for all waste);
- whether the material will be compacted or not (although compaction should only occur if there is an agreement with the PCS' treatment operator that they can accept the material, as compaction will impact on management of the WEEE further down the chain);
- the servicing arrangements – the service contract may dictate the type / size of the containers;
- optimising storage capacity (e.g. an allowance for available capacity);
- planning for peak material flows and busy periods; and
- site drainage.



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20



### 4.3.3 Location of container

Visibility of less well known WEEE groups such as energy efficient bulbs and small mixed WEEE will be increased if they are located next to each other. However, there is a risk that contamination may occur (with different WEEE categories). Therefore good signage is important to help users identify what items are to be deposited where (See Collections at Designated Collection Facilities **section 4.4**).

It is good practice to keep all public areas away from the servicing area. This is not always possible depending on the layout of the site and many sites require the public to deposit their fridges, freezers and other large appliances in areas where there are vehicle movements. Ideally this practice would not occur and an alternative drop off point be provided, with site staff subsequently moving the items with appropriate handling equipment.

If it is not possible to create an alternative drop off facility, other good practice options include:

- A barrier to prevent public access unless permitted by a site operative i.e. only when safe.
- Presence of site operative at appropriate location preventing public access when service vehicles are onsite (unless the whole site is closed during servicing).

**Single level sites:** It is good practice to locate the containers or the area that is designated for the collection of WEEE groups in the same place. This will strengthen the message to the user that the different WEEE groups can all be recycled, for example when disposing of their broken television the user may learn that they can also bring their used energy efficient bulbs to the site.

**Split level sites:** At split level sites, it is suggested good practice to collect cooling appliances, display equipment, fluorescent tubes and energy efficient bulbs on the same part of the site, wherever possible.

- To maximise recycling of large domestic appliances and small mixed WEEE, it is good practice where possible to collect these two streams separately in two 40 cubic yard containers alongside other bulk materials. This will raise awareness and increase visibility of these WEEE streams and demonstrate to the site users that recycling this waste stream is important and will help maximise recycling.

Not all sites have the luxury of space and they may also be an unusual shape, in which case the DCF operator must work within these constraints. Innovative use of space is important. It may be possible to locate containers in unused or less used corners of the site.

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

### 4.3.4 Managing contamination

The location of WEEE containers in relation to other waste and recyclable containers on site will be important in supporting correct segregation of items that would contaminate the WEEE groups if incorrectly disposed of.

It is good practice to highlight to site staff and users the items that should not be included in the WEEE container. As a minimum, a sign to prevent the greatest hazard, i.e. gas cylinders, should be placed near the small mixed WEEE container access point.

Where space permits, it is good practice to house the hazardous WEEE containers next to the other hazardous waste materials, for example, a clearly marked gas cylinder cage. Ideally this area will be near the entrance to the site so that these items are disposed of first, therefore reducing the chance of them being incorrectly deposited simply because it is convenient. However there needs to be a safe unloading area.

Site staff will need to be aware of contamination of WEEE streams, in particular the Small Mixed WEEE container, with non-WEEE wastes. Examples of foreign objects to look out for include:

- gas cylinders/ bottles/ canisters;
- vacuum bags within vacuum cleaners;
- grass cuttings within a lawn mower;
- cooking oil within deep fat fryers; and
- petrol powered equipment including lawn mowers;
- food stuffs or other wastes within fridges and freezers.

Ideally the householder will have removed these materials before depositing the WEEE at the HWRC but it may be necessary, if safe and appropriate to do so, for site staff to remove contamination. For example, staff should check fridges and freezers to ensure they are free from material.

**Non-targeted items and contamination:** These should be disposed of in the appropriate container on site; location of such containers near the WEEE containers may support segregation.

**Container for packaging:** It is worth noting that for small WEEE items and breakable items such as fluorescent tubes and energy efficient bulbs, householders are likely to bring them to the site in protective packaging e.g. the cardboard box or plastic wrapping. To reduce contamination it is good practice to have a small box or bin near the container that the site user can place their packaging into.

As well as managing contamination of the WEEE containers, site staff should monitor and manage contamination in scrap metal containers (i.e. ensure WEEE is collected in the appropriate container).



Gas cylinder cage near WEEE containers and entrance to Burgess Hill HWRC, West Sussex.



Example 'no gas bottles' sign<sup>1</sup>

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 <b>Managing contamination</b>	<b>06</b>
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

<sup>1</sup> Signs Express [www.signsexpress.co.uk/Worcester](http://www.signsexpress.co.uk/Worcester)

### 4.3.5 Type of containment

Collection containers should be provided by the PCS and therefore the collection method should be arranged in conjunction with them. The PCS, DCF operator and treatment facilities should agree the most appropriate collection method (taking into account the above).

Therefore when recycling Large Domestic Appliances and Small Mixed WEEE at a DCF it is good practice to use the largest containers the site can accommodate, taking account of the health and safety requirements, the design of the site and how it is to be filled (by the public or staff).

The containment method should be fit for purpose and should not undermine subsequent treatment, i.e. should prevent damage and reduce health and safety risks.

On sites with single level architecture, multiple smaller containers are an alternative option if there is no room for gantries alongside larger containers. The benefit of multiple containers is that as with large containers, visibility of the material stream is increased and available capacity will mean items can be segregated.

WEEE that is to be recycled (i.e. not reused) does not need to be covered unless the conditions of the site permit from the relevant regulatory authority state otherwise. Local authority officers and site managers should check the conditions of the permit if they are unsure. WEEE that is to be reused should be covered to protect the integrity of the items.

Enclosed containers: It is not necessary to store all WEEE in enclosed containers, however it is good practice to store any leaking items or those that are potentially reusable undercover to protect them from any or further damage. It may also be preferable from a security point of view to store items undercover.



#### EXAMPLE:

Leicestershire County Council and West Sussex County Council use large containers and achieve high WEEE recycling rates as people can easily see what can be recycled. The site also has good signage that contributes.

The size and number of containers should be appropriate for the site. The table below lists various options. They are not prioritised in order of good practice as the most suitable container will also depend on a number of factors.

WEEE Category	Container options
Large household appliances	Hard standing area, shipping container, 40 cubic yard ro-ro skips.
Cooling appliances	Hard standing area, shipping container, loose loaded onto vehicle and, or pallets.
Display Screen Equipment	Shipping container, walk-in skip, open cages, loose loaded onto vehicle and/or pallets.
Fluorescent tubes and energy efficient bulbs	Coffins, metal containers, pallet boxes. It is not recommended to use barrels or wheelie bins (unless this is an interim arrangement and the tubes or bulbs are transferred into a coffin or other suitable container by operatives).
Small Mixed WEEE	Eurobins, cages, skips (12 or 20 yard, open top), 40 cubic ro-ro skips.

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20



## 4.4 Site signage and awareness raising

All signage should be simple and appropriate. Positioning signs so that they can be seen by incoming traffic and not obscured by containers or waste material is beneficial. Signs at the entrance are useful, but should be supplemented with individual material stream signs. Ideally, these should be located on or at containers.

Household Waste and Recycling Centres (HWRCs) require a large number of signs to both indicate the materials that can be segregated and for health and safety purposes. The site can be overloaded with too many signs meaning staff and users become confused by the messages. However, WEEE signs will be needed to raise awareness of the WEEE facilities and to help reduce contamination by providing correct instructions for users.

The signs need to be good quality and of adequate size to convey the information. Further advice on appropriate signage is available in the National Assessment of Civic Amenity Sites report. It is good practice to link to national campaigns to increase recognition by the public and therefore impact.

For WEEE group specific signage, it may be appropriate to provide instructions to support quality control. For example, the addition of 'yes please' and 'no thanks' lists, and specification that the appliances should be electrical or electronic. It is worth noting that signage for other waste streams may need to be amended to account for WEEE, e.g. scrap metal.

It is good practice for signs to be included on or at containers. If they are on the (metal) container, magnetic signs can be good as they can be removed and placed onto the new empty container. However they are expensive and may not stick as well once they are dirty or the surface is dirty. Also the site staff and collection contractor must remember to remove them before the container leaves.

Commercial DCFs, i.e. sites not open to the public, generally have less or no signage. It is good practice to have some simple directional and instructional signage to supplement the information given by site operatives.

### EXAMPLE:



In England and Wales it is considered good practice to use the Recycle Now material icons on signage along with the other WRAP signs that are available in the Download Area of the **Recycle Now Partners** website. This ties into the national campaign. Zero Waste Scotland have signage available. In Northern Ireland it is good practice to use the design guidelines produced by the relevant regional waste management group.

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

## 4.5 Staff training and motivation

Well trained and motivated staff will be crucial to the successful segregation of WEEE for reuse and recycling at HWRCs. If staff are motivated to recycle, understand the entire recycling process through good training and there are an adequate number of staff on site, there will be a positive effect on the recycling rate of the site, including WEEE.

Incentives to encourage segregation are one method of motivating site staff; however this will depend on the contract arrangements and policies in place between the local authority and the site manager or contractor. The National Assessment of Civic Amenity Sites report discusses incentives in more detail.

Training of staff members that will be involved in segregation of WEEE is important, whether it is a dedicated role or the responsibility of all site staff. WEEE training should be delivered by a competent person as part of a wider training programme and should include:

- What is WEEE and what are the WEEE groups segregated on site?
- What are the procedures for handling WEEE on site?
- What is contamination and how staff can help to reduce it?
- What happens to the WEEE when it is reused or recycled (where does it go?)

Training should be brief and simple, see example to download. This should be delivered as part of a training programme and where practicable a visit to the AATF to see first hand the activity that occurs at the treatment facility. If this is not possible, a representative of the AATF present during training could, for example, help to answer any questions as to why contaminants need to be controlled, why segregation is important and what happens to the WEEE during treatment, for example.

The PCS may be able to provide training material and may even be in a position to offer training. This should be discussed with the PCS.

Well trained staff should:

- be aware of the WEEE groups;
- know what constitutes contamination;
- know how to identify reusable WEEE if applicable;
- know how WEEE should be handled safely; and
- know what happens when the WEEE is collected and the benefits of reuse / recycling.

It is good practice for the training materials to be available on site for new and agency staff to read and include in the staff induction. This could be in the form of a handout which is included in the site folder or a poster that is displayed in the site office. At the end of the initial training, a number of basic WEEE questions could be asked to the site staff to test their knowledge.



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

### 4.5.1 Identifying reusable WEEE

It is good practice for DCFs to have a reuse organisation as a partner, identified by either the local authority or the PCS. The chosen organisation should be approved by the PCS and the local authority. A reuse organisation can be “associated” with an AATF (if approved by the PCS) so that the AATF issues the evidence on their behalf and takes responsibility for ensuring that all relevant permits are in place and all reuse (and recycling) routes are legitimate.

Ideally, the reuse facility will be manned by a member of the reuse organisation who is very familiar with the needs of their clients. However this may not be possible, in which case it is good practice to include reuse identification in site staff training. This could take many forms:

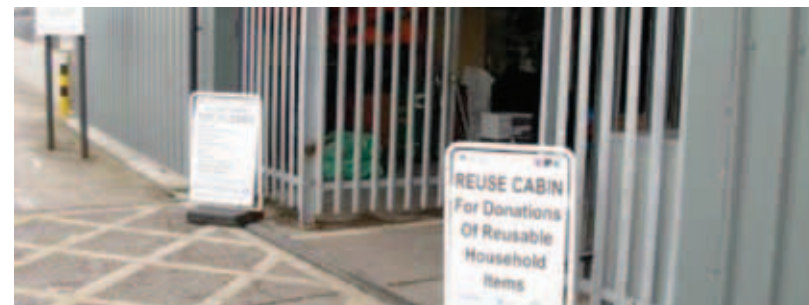
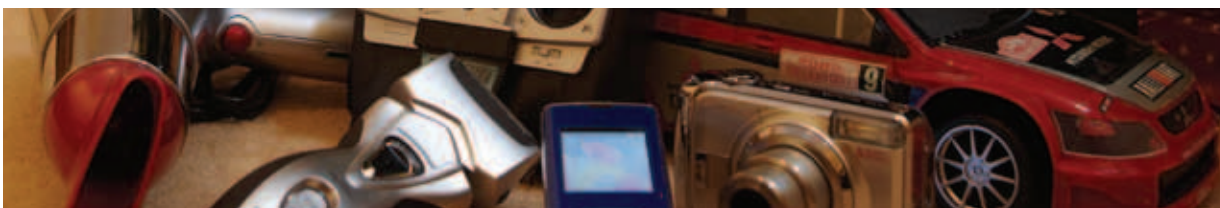
- reuse organisation staff member on site for a short period of time, identifying acceptable and unacceptable items with the site staff and explaining why such a decision has been made and key features to look for;
- a visit of one or more site staff to the reuse organisation to see first hand how they manage the WEEE that is removed from site, how it is refurbished and tested and importantly, what happens to items that are not reusable; and
- a list from the reuse organisation of acceptable and unacceptable items which can be displayed inside the reuse facility. This will be of use to staff and the public, and if the facility is large, an A-frame sign at the entrance is a good option.

Items are likely to be initially assessed by site operatives based on appearance, age and description from the householder. A second assessment may be made by staff from the reuse organisation when they come to collect the WEEE to take back to their premises. In some cases the organisation will take all items, reusing and recycling what they can. If the organisation does not arrange recycling, they may have an agreement with the HWRC to return any items that are not reusable, to be appropriately recycled from the site.

Alternatively, the reuse organisation may cherry pick items they perceive to be reusable from those that have been segregated from site staff. This may mean that some WEEE items not deemed to be reusable by the reuse organisation need to be deposited elsewhere onsite for recycling.

Local authorities will need to consider how they choose which third section organisation to partner with if there are several in the area. One option is to manage a formal tendering process. Additional guidance on reuse will be available shortly from WRAP.

Further good practice to maximise reuse is available in *Reuse*.



Reuse cabin, Seafield Community Recycling Centre, Edinburgh City Council.

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

#### 4.5.2 Division of staff roles and responsibilities

The roles and responsibilities of staff on site is important for the safe management of the site as a whole as well as the segregation of materials, including WEEE. If staff have overall responsibility for WEEE, it can improve segregation for both reuse and recycling. If all staff have the same responsibility, it may be beneficial to have incentives for the site operator or the site staff to ensure separation.

Where there are fewer available specialist staff on site, especially during busy periods, all staff will need to be responsible for helping the public to identify the correct option, as they would for any material stream. However, if the public are not expected to deposit the items into the containers themselves, only appropriately trained staff should be responsible for handling the WEEE. For example, if LDA are to be moved by trained personnel using a loader.

**Additional support:** In some areas it will be appropriate to have a dedicated staff member to manage WEEE, however this need not be permanent. West Sussex employed additional staff when WEEE segregation began in July 2007. This was a temporary measure and helped to ensure correct segregation of WEEE and education of site users without interfering with existing staff roles. However the use of resources in this manner will depend on the staffing on the site as a whole and is not therefore good practice in all situations. For example in Edinburgh, a review of the number of staff on site at any one time improved the staffing levels and means that there are sufficient staff to have joint responsibility for segregation of all material streams.

**Monitoring and removing contamination:** WEEE segregation can be performed by staff alongside several other roles and should include monitoring and removing contamination, if it is safe to do so. Site staff should take account of site health and safety procedures and risk assessments, but if these risks are adequately managed, there is no reason why contaminants should not be removed - this can be added to the responsibilities of staff too. As per the Code of Practice, DCF operators should take reasonable steps to reduce contamination and inform ATFs of any contamination of loads.



Potentially reusable WEEE, Inverness HWRC, Highlands Council.

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 <i>Division of staff roles and responsibilities</i>	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20



#### EXAMPLE:

After a formal tendering exercise Warwickshire County Council (WCC) has established onsite reuse operations at some HWRCs. WCC formally contracts the operations to local charitable organisations, which employ staff and volunteers to accept donated items from site users. The staff then refurbish and test WEEE (and furniture), to sell to members of the public. The on-site presence of a reuse operation of this kind has been very

successful: all items coming to the reuse sheds are assessed at the point of donation; those that are not deemed reusable and marketable are redirected to the recycling areas.



### 4.5.3 Handling reusable and recyclable WEEE

A key element of reuse good practice is to ensure that the WEEE is treated with due care and attention.

Any WEEE that is identified as potentially reusable requires careful handling and therefore should be protected from weather damage and handled appropriately. All reusable items should be housed in a covered container and moved using appropriate equipment (such as padded sack trucks) with due care and attention.

In line with the BIS Code of Practice, WEEE must be:

- separately collected from other wastes to qualify for free collection;
- from “private households” as per the definition in the WEEE Regulations (see End User Business **section 9.1**); and
- complete, which means that cables and component parts that are valuable or essential are not removed.

It is not recommended to remove cables from appliances as this means the item cannot be reused and reduces the value of the equipment to AATFs when it is recycled therefore increasing the costs for producers. If there are concerns over health and safety (e.g. trip hazards) the cables should be taped to the WEEE item. If cables are removed, they should be placed into the relevant container or bag for collection along with the WEEE. Cables should not be removed from site by site staff or a third party. Theft of cables does occur and may need to be addressed when considering wider security issues. This should be clarified in the agreement with the PCS.

When handling reusable and recyclable items the following should be avoided:

- removal of components from electrical items;
- removal of items for reuse (unless through official / approved channels);
- breaking or crushing items (unless appropriate to the WEEE group and treatment method); and
- removal of doors and / or internal furniture such as salad trays.

When handling items, operatives need to work within health and safety guidelines and use appropriate mechanical loaders and hand lifting equipment such as sack barrows and trolleys, pallet handlers, bucket lifts, and pallet trucks (See Collections at Designated Collection Facilities **section 2.8**). Some items are moved by hand, and therefore staff must be trained in manual handling. There is advice available from the **HSE** on the storage of hazardous wastes at HWRCs.



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20



Items such as fridges and freezers should be clean and empty when delivered to a DCF or carried out by the collection contractor under agreement with the DCF operator. Site staff should open all units to check and remove any organic or other matter and dispose of it in an appropriate container. The doors should be taped closed and the rubber door seals can be removed from non-reuseable items to prevent an airlock if there are health and safety concerns. Any loose doors, for example those that have fallen off prior to deposit at the DCF or at the DCF should be stored with the appliances (not placed with the LDA).

#### 4.5.4 Health and safety

Fridges and freezers have been subject to the Ozone Depleting Substances (ODS) Regulations (2037/2000/EC) since January 2002. All waste refrigeration appliances containing ODS (e.g. CFCs) must be sent to specialist reprocessors. Most refrigerators entering the waste stream are between 10 and 15 years old, and therefore may contain ODs.

Health and safety must be considered when segregating any material stream. Health and safety needs to be included in site staff training to ensure that dangerous situations are avoided. To achieve maximum efficiency while taking account of health and safety, there are a number of options that can be implemented. The table below lists some health and safety good practice when handling different WEEE. The table also considers what should be avoided.

Guidance is available from the [HSE](#) on the safe management of materials at HWRCs. In some instances, guidance may seem to be contrary to other drivers such as maximising loads per container. In these instances it will be important that health and safety is not compromised and therefore the PCS, treatment facility and DCF operator may need to discuss the most appropriate methods and containers to use to satisfy all stakeholders.



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

WEEE group	Health and safety good practice for recycling	Health and safety risks to avoid or minimise, i.e. do not...
<b>Display screen equipment</b>	<ul style="list-style-type: none"> <li>■ Do not stack above head height, be aware of manual handling.</li> <li>■ Stack smaller e.g. portable TVs or monitors on top of larger TVs or monitors so they are balanced and will not fall causing injury to operatives or damage to the unit.</li> <li>■ Flat screen televisions placed around the side of the container to prevent movement during transit.</li> <li>■ Stacked by staff not public.</li> </ul>	<ul style="list-style-type: none"> <li>■ Drop into 40 cubic yard skips on split level sites as this causes the screens to crack and break.</li> <li>■ Place large units on top of small units as they will be unbalanced, can potentially fall leading to cracks and breakage.</li> <li>■ Rest the weight of the load on the back door because this can be unsafe when the container is lifted onto the vehicle, during transport and on arrival at the AATF.</li> <li>■ Store overspill on the ground.</li> </ul>
<b>Large Domestic Appliances</b>	<ul style="list-style-type: none"> <li>■ Can be placed into 40 cubic yard container from a scissor table (i.e. taking account of manual handling).</li> <li>■ Can be stored on hard standing area and loaded directly onto vehicle.</li> </ul>	<ul style="list-style-type: none"> <li>■ Lift appliances by hand without manual handling training or training in the use of the handling aid.</li> </ul>
<b>Cooling equipment</b>	<ul style="list-style-type: none"> <li>■ Stack fridges and freezers no more than two high or up to 2m in height.</li> <li>■ Ensure fire breaks are in place where large volumes of units are stored.</li> <li>■ Place loose doors and fridge furniture into a chest freezer to prevent slippages during transit.</li> <li>■ Ensure copper piping is pushed into the carcass to prevent damage and refrigerant leaks.</li> </ul>	<ul style="list-style-type: none"> <li>■ Lie fridges and freezers on the ground to prevent leaks of the coolant and damage to the copper piping.</li> </ul>
<b>Small Domestic Appliances/ Small mixed WEEE</b>	<ul style="list-style-type: none"> <li>■ Can be placed into 40 cubic yard skip.</li> </ul>	<ul style="list-style-type: none"> <li>■ Mix with LDA<sup>2</sup>.</li> <li>■ Mix with non-WEEE.</li> </ul>
<b>Fluorescent tubes and energy efficient bulbs</b>	<ul style="list-style-type: none"> <li>■ Disposal of tubes and bulbs by the public or site staff only will depend on the type of containers used. Public may be asked to deposit tubes or bulbs in an interim container.</li> </ul>	<ul style="list-style-type: none"> <li>■ Do not drop bulbs or tubes into container (breakage can occur).</li> </ul>
<b>Access to service areas</b>	<ul style="list-style-type: none"> <li>■ No public access to service area.</li> <li>■ Restricted and supervised access to service area.</li> </ul>	<ul style="list-style-type: none"> <li>■ No unsupervised public access to service area for health and safety reasons.</li> </ul>

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

<sup>2</sup> Can be permissible in rare circumstances if the AATF has an agreed protocol in place to assess and report on the WEEE arriving



## 4.6 Uplift of WEEE

All stakeholders want to maximise the loads to minimise the economic and environmental impact of transport. Haulage contractors that are transporting potentially reusable WEEE need to handle the products appropriately (i.e. secure and protected from knocks / damage) to ensure they reach the reuse operator in good condition.

The timing of collections and the methods used will be important if reuse and recycling is to be maximised. It will be necessary to balance the need for onsite capacity with environmentally and economically efficient transport (i.e. full loads). Moving half loads is inefficient, whilst full or overflowing containers can be dangerous and give the public a negative perception.

The site staff will be best placed to identify collection frequency and uplift requirements taking account of other influencing factors such as peak flows, other material collections and anticipated throughput of WEEE. For example, only small busy sites with a high daily throughput are likely to need daily collections.

### 4.6.1 Liaising with haulage contractors

Direct liaison between the DCF operator and the haulier is the preferred option for the DCF as it will allow more local flexibility. This must, however, be agreed with the PCS.

The preferred option for some PCSs is for DCFs to contact the PCS central control centre to arrange collection. This method may result in quicker response times and it allows the compliance scheme to monitor performance, maintain accurate records of transactions. This may result in less duplication of evidence and should reduce leakage from the system. However the DCF should discuss with the PCS if they are not satisfied with the arrangement and the response time.

Direct liaison with the haulier and using the PCS call centre can both represent good practice if the communication routes are clearly identified from the start and reviewed regularly. The interaction between a site and the transport provider will be detailed in the agreement to should take account of local needs and circumstances.

A good relationship with the haulier or the PCS will be important. Suggestions for achieving and maintaining a good relationship include:

- tailor the arrangements to suit individual needs and be flexible;
- try to understand the pressures on other stakeholders and why for example, they may need to make alternative arrangements;
- maintain regular contact to show commitment to the arrangement. An additional benefit of regular communication is that other good practice can be highlighted when discussing wider issues;
- use the telephone as well as email as many people appreciate personal interaction;
- highlight when things are going well, not just complain about poor practice; and
- be prompt responding to emails and phone calls.



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

## EXAMPLE:

Sites in Northern Ireland aspire to operate with a minimum 10% spare capacity in the WEEE containers. Therefore when they are 90% full arrangements are made for uplift. Assessment is visual and uses site staff knowledge of the time taken for containers to fill and the number of items they expect to receive. This aims to ensure there is no overspill which could impact on other site activities and result in a health and safety risk (or breach of site permit).

Alternatively, DCFs may have regular scheduled collections that are daily, several times per week, weekly or monthly depending on the type of WEEE group, size of the container and how quickly it fills. Regular servicing works well on some HWRCs, for example, in South East Wales where 1100 litre wheeled bins are used for small WEEE.

Uplift arrangements may need to be scheduled if staff are aware of when and how to make collection arrangements.

It is good practice for the site to implement a booking procedure for uplifts: a booking reference number (issued at the time of booking), recorded in a site log book with the date of the order and confirmation of the date of collection and signed by the staff member. This allows KPI monitoring of haulage contractors and ensures the site is aware of the uplift requests that have been made.

Managing persistent problems: A good working relationship will help to avoid persistent problems, as will training and education of all staff involved in the supply chain, such as DCF site staff and drivers. With issues such as (the acceptance of) contaminated loads or health and safety risks associated with poorly loaded containers, it is good practice for the site manager to liaise with the PCS and treatment facility to understand why these issues cause a problem. For example, what constitutes contamination, how it should be managed and preferred loading methods (to facilitate unloading). See the treatment guidance. However if there are still persistent problems, as per the Code of Practice, local authorities, site operators and PCSs should aim to resolve disputes within five working days. There may be circumstances when more persistent problems arise in these cases and arbitration can help.

### 4.6.2 Timing of collections

Haulage contractors should be made aware of times to avoid the site and this can be achieved through regular communication and receiving information from the DCF. Scheduling of collections is included in the Code of Practice.

It is good practice to ensure containers are cleared prior to busy or peak times, however this will depend on how busy the site is and the throughput of WEEE.

Joint servicing and public areas: On sites where servicing and public vehicle access is not separate, it is good practice for the collections of WEEE containers to take place out of site opening hours, thereby ensuring that the public are not present and collections do not impede other services on site. However this is not always possible and therefore it will be important for site staff to be satisfied that collections do not interfere with their operations or create a hazard.



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

## EXAMPLE:

In Edinburgh City, the haulier has provided services for a long time and is well known to site staff. Once a phone call is made, the haulier will arrive on site within 24 hours and in some cases the same day.

The method of collection and type of vehicle to use will of course depend on the type of WEEE that requires clearing. When onsite, hauliers will need to take account of site health and safety procedures, a source of further information is HSE guidance for safe transport in waste management and recycling facilities. Whilst not WEEE specific, this will be relevant to hauliers collecting WEEE at HWRCs.

On small sites, it may be appropriate to move WEEE to a nearby second site whereby it can be bulked with other WEEE before onward transport to the treatment facility. However arrangements need to be in place to ensure that the WEEE is not sorted at the interim site, with valuable WEEE segregated to illegitimate routes. In Nottingham the contractor takes WEEE from the City HWRC to their own site nearby, from which the treatment operator clears the WEEE in a 40 foot curtain sided lorry. This benefits both the transport provider and the authority (Nottingham City Council) by ensuring that the DCF is cleared regularly preventing build up of WEEE but that full vehicles are transported to the treatment operator, reducing the economic and environmental impact of the vehicles.

Separate servicing and public areas: On sites where vehicle access is separate, the timing of collections may be less important as it will not interfere as much with site functions.

If the same contractor is clearing different WEEE groups, drivers may assess the need for collection of other streams when collecting one. This can help to avoid over or under collection if a schedule is in place.

### 4.6.3 Liaison with treatment operator

Direct liaison between the DCF and treatment operator will ensure that both parties are aware of the requirements of the other.

The training of DCF site staff should include information provided by the treatment operator on their acceptance criteria and what they will do when contamination is found. Training could also include a visit to the treatment facility – this is particularly good practice for sites where problems have occurred and need to be addressed. By observing the impact of good and bad loads on treatment operations, poor practice will hopefully be eliminated. In addition, it is suggested that the DCF ensure they have proof that items were dispatched, for example a log of vehicle loads. This will help to ensure there is no leakage between the DCF and treatment operator because the data can be audited against that recorded at the treatment facility.

The DCF operator is required to conduct a Duty of Care audit and to report the end destination of recycle for WasteDataFlow. It is good practice for the local authority to conduct these audits,



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20



however, they may have an arrangement with the PCS partner to carry out the audits and report back as necessary. The DCF operator will have duty of care responsibilities to ensure that the AATF is licensed to accept the waste being sent to them and any onward recovery is to appropriate facilities. It is suggested that local authorities request evidence of audits and outcomes conducted at the AATF.

## EXAMPLE:

In Edinburgh, WEEE containers are serviced on a Friday to ensure capacity for the weekend (the busiest period) and then serviced on a Monday to clear the weekend materials. On quieter sites it may not be necessary to clear twice per week; however the site manager will still need to consider the needs of the site during busy periods.

Problems may arise if there are late or missed collections. The impact of this can be minimised if there is regular communication. The Code of Practice states, agreement between the PCS and the local authority or site operator should stipulate that if servicing has not occurred after 24 hours or (12 hours of site opening) then the local authority or site operator can make their own arrangements and, if appropriate, charge this to the PCS (as per the WEEE Regulations).

The DCF should take all responsible steps to ensure they manage WEEE in such a way as to be able to deliver WEEE to reproprocessors of acceptable quality. This means they have appropriate signage, handling equipment and staff training to manage WEEE onsite and meet the standards as detailed in the Code of practice.

Collections at Designated Collection Facilities. 3.4 discusses what the DCF can do to proactively reduce contamination. However it may still arise and therefore there need to be arrangements in place to allow the ATF/AATF to manage contaminated loads if they do arise. A hierarchy of options depending on the severity and frequency of contamination occurrences is:

- manage contamination at the treatment facility (if licensed to do so) and inform PCS and / or DCF operator of the incident;
- charge PCS or DCF operator for disposal or treatment of the contaminant;
- reject the entire load; and
- refuse to accept further loads until measures are put in place to prevent contamination from occurring in future.

Refusal of loads is a last resort following ongoing problems that have been highlighted and addressed through other means but not resolved.



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

#### 4.6.4 Preventing loss of items to third parties/theft or leakage

Security issues and theft can be exacerbated on sites where WEEE is segregated. Items that are not locked away are often targeted, as are particular items such as IT equipment.

An area of concern to the WEEE industry is the leakage of WEEE out of the system which is unreported. The problem is that material that leaks from the system could end up being treated through unapproved routes and illegally exported. In addition, losing the material without measuring the weight reused adversely affects the UK's ability to meet future collection targets. It is therefore good practice for site operators to do all they can to prevent DCFs from being the source of such losses.

'Third parties' refers to any organisation or individual that removes waste from site that is not the local authority or the site waste management contractor. This may mean a reuse organisation (charity, individual or commercial), a salvage operator or other historic contractor.

One area where material may be unaccounted for is through the legitimate but unreported collection by third parties, whether an individual with salvage rights or a reuse organisation cherry picking for reuse. This is why it is important for all WEEE to be treated in accordance with the regulations.

Site operators should be aware that some items are, or are perceived to be, of high value and if they are segregated from the waste stream can provide an easy target for thieves and vandals. 'Pickers' may be tempted to break into sites to steal WEEE, resulting in damage such as broken fences and locks, damage to containers, mess and other vandalism. Good practice for different sites will depend on local knowledge of the area and existing mitigation measures but may include one or more of the following:

- store items in containers that can be locked, 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 informs trespassers "this site is private property etc") that are activated when motion is detected;
- employ manned security for sites with significant security problems; and
- build a relationship with the local police to try and ensure quick response when CCTV captures live images.

It is good practice to record any thefts and attempted thefts and report to the local police obtaining a crime reference number. This can result in incidents of high frequency being prioritised.

#### EXAMPLE:

In rural Hertfordshire, frequent reported break-ins to the reuse store on an HWRC resulted in the police installing a camera which caught the offenders.

It will be important that the responsibility for security issues is included in the contract between local authorities and site operators to ensure that it is clear who is responsible for the repair and financing of any damage and to ensure repairs are carried out as soon as possible

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

## 4.7 Managing non-household WEEE at DCFs

WEEE from businesses that is similar in nature and quantity to that from householders can be accepted as B2C WEEE (at the discretion of the local authority and with advice from the appropriate environment agency).

Sites can only accept WEEE from non-household sources if they are permitted to receive commercial waste. However, even if permitted to accept commercial waste, many choose not to because of other factors such as local strategies and policies. Also if there is little space, it will be difficult to separate commercial waste from household waste. There may also be other problems to contend with, such as:

- traders using the household services;
- handling money onsite;
- managing the volume of waste onsite; and
- a reduced service available to residents.

The **HazGuide** produced by the NHHWF and CIWM has included a Case Study on this issue from West Sussex County Council. HWRC operators are advised to check with local authority officers for advice on managing commercial WEEE on their site.

Good practice for most local authorities will be to offer advice to businesses on how to recycle their WEEE responsibly so that it does not enter their HWRC. This is because many businesses use the local authority as a source of information and may expect waste services. The information can be delivered through relevant web pages and links with the local Business Link.

A complicating factor is that under part 1 of the WEEE Regulations 2006, “WEEE from private households” is defined as WEEE which comes from private households and from commercial, industrial, institutional and other sources which, because of its nature and quantity, is similar to that from private households. What constitutes acceptable amounts of WEEE from businesses in relation to the definition of WEEE from private households can be difficult to determine.

BIS has indicated this is at the discretion of the local authority and the service it wishes to provide small businesses.

Like any type of trade waste, non-household WEEE (B2B) should only be accepted at sites that are licensed to do so and if this is a site where B2C WEEE is also accepted, it is essential to keep this separate. Local authorities should be aware that they are responsible for all costs that will be incurred for B2B WEEE collected. For both these reasons it is important that the commercial WEEE that is brought to site is recorded (see example template).

In addition, the site users must comply with the requirements of the site. As with other material streams, businesses can be encouraged to recycle through variable charging. With regard to hazardous WEEE, in line with Hazardous Waste (England and Wales) Regulations 2005, any delivery of hazardous WEEE from a business that is similar in nature and quantity to household WEEE, must

### EXAMPLE:

Suffolk County Council HWRC will accept small quantities of household type WEEE from businesses but will not accept other waste or recycling from this source. The definition above then allows Suffolk County Council to manage these items as B2C WEEE.

4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

have a consignment note. This involves an additional administration charge to the business. Any commercial WEEE accepted at a DCF (such as commercial fridges and freezers) cannot be included in the free collection and treatment agreement and the DCF operator should therefore make their own arrangements. All collection and treatment however should still follow approved routes to ensure that the recovery and recycling is carried out appropriately.

At sites that do not accept trade waste, it will be important to distinguish commercial / non-household and B2C WEEE as they would with any potential trade waste onsite. There are a range of measures in common use, including:

- commercial vehicle restrictions with permits for householders;
- disclaimer forms;
- height barriers;
- site 'greeter' or security guard; and
- another option is the use of Automatic Number Plate Recognition (ANPR) which is becoming more common at sites throughout the country.

Methods for managing trade waste abuse are considered in the National Assessment of Civic Amenity Sites report as well as the earlier Trade Waste Inputs to Civic Amenity Sites report.

While steps have been taken to ensure its accuracy, WRAP cannot accept responsibility or be held liable to any person for any loss or damage arising out of or in connection with this information being inaccurate, incomplete or misleading. This material is copyrighted. It may be reproduced free of charge subject to the material being accurate and not used in a misleading context. The source of the material must be identified and the copyright status acknowledged. This material must not be used to endorse or used to suggest WRAP's endorsement of a commercial product or service. For more detail, please refer to our Terms & Conditions on our website – [www.wrap.org.uk](http://www.wrap.org.uk)

**Waste & Resources  
Action Programme**

The Old Academy,  
21 Horse Fair,  
Banbury, Oxon  
OX16 0AH

Tel: 01295 819 900

Fax: 01295 819 911

E-mail: [info@wrap.org.uk](mailto:info@wrap.org.uk)

Helpline freephone

0808 100 2040

[www.wrap.org.uk/WEEEGuidance](http://www.wrap.org.uk/WEEEGuidance)



4.1 Factors that affect WEEE good practice at DCFs	01
4.2 Staff interaction with site users	02
4.3 Containers	03
4.3.1 Public access to containers	03
4.3.2 Size of container	03
4.3.3 Location of container	05
4.3.4 Managing contamination	06
4.3.5 Type of containment	07
4.4 Site signage and awareness raising	08
4.5 Staff training and motivation	09
4.5.1 Identifying reusable WEEE	10
4.5.2 Division of staff roles and responsibilities	11
4.5.3 Handling reusable and recyclable WEEE	12
4.5.4 Health and Safety	13
4.6 Uplift of WEEE	15
4.6.1 Liaising with haulage contractors	15
4.6.2 Timing of collections	16
4.6.3 Liaison with treatment operator	17
4.6.4 Preventing loss of items to third parties/theft or leakage	19
4.7 Managing non-household WEEE at DCFs	20

