Waste Electrical and Electronic Equipment Collection Guide

Robust services in WEEE collection
## Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Introduction</strong></td>
<td>2</td>
</tr>
<tr>
<td>Acronyms and terminology</td>
<td>3</td>
</tr>
<tr>
<td><strong>Set up</strong></td>
<td>5</td>
</tr>
<tr>
<td>Contracts and partnership agreements</td>
<td>5</td>
</tr>
<tr>
<td>Promoting re-use in collection</td>
<td>8</td>
</tr>
<tr>
<td>Ensuring quality of items for re-use through communications</td>
<td>9</td>
</tr>
<tr>
<td>Raising public awareness of re-use</td>
<td>11</td>
</tr>
<tr>
<td>Retailer in-store communication (signage and public communications)</td>
<td>12</td>
</tr>
<tr>
<td><strong>Collections and Household Waste Recycling Centres (HWRC)</strong></td>
<td>14</td>
</tr>
<tr>
<td>Re-use at HWRCs</td>
<td>14</td>
</tr>
<tr>
<td>Managing contamination</td>
<td>18</td>
</tr>
<tr>
<td>Identifying re-usable WEEE</td>
<td>20</td>
</tr>
<tr>
<td><strong>Collection at kerbside – bulky waste and small mixed WEEE</strong></td>
<td>24</td>
</tr>
<tr>
<td>Bulky waste</td>
<td>24</td>
</tr>
<tr>
<td>Small mixed WEEE</td>
<td>26</td>
</tr>
<tr>
<td><strong>Retail take-back</strong></td>
<td>27</td>
</tr>
<tr>
<td>Household awareness and consumer information obligations</td>
<td>28</td>
</tr>
<tr>
<td><strong>End user business</strong></td>
<td>30</td>
</tr>
<tr>
<td>Arranging a WEEE collection</td>
<td>30</td>
</tr>
<tr>
<td>Data security</td>
<td>31</td>
</tr>
<tr>
<td>Data management</td>
<td>32</td>
</tr>
</tbody>
</table>

WRAP | Waste Electrical and Electronic Equipment Collection Guide
The focus of this guide is on the collection of Waste Electrical and Electronic Equipment (WEEE) from households through designated collection facilities (DCFs) (i.e. Household Waste Recycling Centres (HWRCs) or Civic Amenity (CA) sites), kerbside, and bulky waste collections, and retailer take-back).

It brings together existing information and explains the roles of different parties, particularly operators of approved DCFs, approved Producer Compliance Schemes (PCSs) and Local Authorities (LAs). It also allows the reader to focus on the subjects of interest.

The guide does:
- Build on statutory guidance from central Government and assumes compliance with the WEEE Regulations.
- Identify good practice choices, allowing adoption of most suitable WEEE collection methods.

The guidance does not:
- Duplicate or replace the Code of Practice for the collection and treatment of WEEE and any relevant statutory guidance.
- Replace local knowledge.
- Apply in all situations.

The WEEE groups considered are:
- **A** – Large household appliances (washing machines and dishwashers).
- **B** – Cooling appliances (fridges and freezers, air conditioning units).
- **C** – Display Equipment (cathode ray tube (CRT), liquid crystal display (LCD) and plasma displays, e.g. TVs and monitors).
- **D** – Gas discharge lamps (fluorescent tubes and energy efficient bulbs).
- **E** – All other WEEE (normally called Small Mixed WEEE (SMW)) – for example irons, toasters, hairdryers, PCs, printers).
- **F** – Photovoltaic panels (do not need dedicated space for collection).

Further guidance and research on the collections, re-use, recycling and recovery of WEEE is available on the WRAP website at www.wrap.org.uk/sustainable-electricals.

Please note links in this guidance are to English only content, unless otherwise stated.
## Acronyms and terminology

### Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AATF</td>
<td>Approved Authorised Treatment Facility</td>
</tr>
<tr>
<td>ATF</td>
<td>Authorised Treatment Facility</td>
</tr>
<tr>
<td>AE</td>
<td>Approved Exporter</td>
</tr>
<tr>
<td>B2B</td>
<td>Business to Business (EEE or WEEE) products</td>
</tr>
<tr>
<td>B2C</td>
<td>Business to Consumer (EEE or WEEE) products</td>
</tr>
<tr>
<td>BEIS</td>
<td>Department for Business Energy, Innovation and Skills</td>
</tr>
<tr>
<td>COP</td>
<td>(BEIS) Code of Practice</td>
</tr>
<tr>
<td>CRT</td>
<td>Cathode Ray Tube</td>
</tr>
<tr>
<td>DCF</td>
<td>Designated Collection Facilities (approved by BEIS)</td>
</tr>
<tr>
<td>DTS</td>
<td>Distributor Take Back Scheme</td>
</tr>
<tr>
<td>EEE</td>
<td>Electrical and Electronic Equipment (i.e. equipment that is not yet a waste)</td>
</tr>
<tr>
<td>HWRC</td>
<td>Household Waste and Recycling Centre/ Civic Amenity site</td>
</tr>
<tr>
<td>LA</td>
<td>Local Authority</td>
</tr>
<tr>
<td>LDA</td>
<td>Large Domestic Appliances</td>
</tr>
<tr>
<td>NIEA</td>
<td>Northern Ireland Environment Agency</td>
</tr>
<tr>
<td>NRW</td>
<td>Natural Resources Wales</td>
</tr>
<tr>
<td>ODS</td>
<td>Ozone Depleting Substances</td>
</tr>
<tr>
<td>PCS</td>
<td>Producer Compliance Scheme</td>
</tr>
<tr>
<td>RoHS</td>
<td>Restriction on certain Hazardous Substances</td>
</tr>
<tr>
<td>SEPA</td>
<td>Scottish Environment Protection Agency</td>
</tr>
<tr>
<td>SMW</td>
<td>Small Mixed WEEE</td>
</tr>
<tr>
<td>WCF</td>
<td>Waste Collection Facility</td>
</tr>
<tr>
<td>WEEE</td>
<td>Waste Electrical and Electronic Equipment</td>
</tr>
<tr>
<td>WTN</td>
<td>Waste Transfer Note</td>
</tr>
</tbody>
</table>
**Terminology**

**Business end user WEEE**
Means WEEE from an industrial, institutional or other commercial source.

**Clearance**
Means the removal of separately-collected household WEEE from a DCF for the purposes of treatment, recovery and environmentally sound disposal.

**Code of Practice**
Means the BEIS Code of Practice for collection of Waste Electrical and Electronic Equipment from Designated Collection Facilities.

**Designated Collection Facility (DCF)**
Means a site which has been designated under the Regulations as one receiving household WEEE of which producers are required to finance the collection, treatment, recovery and environmentally sound disposal in accordance with Article 8.1 of the Directive.

**DCF Operator**
Means an organisation responsible for a whole site and holds DCF approval.

**Distance Seller**
Means an internet, mail order or a tele-sales retailer.

**Distributor**
Means any person who provides electrical or electronic equipment on a commercial basis to the party who is going to use it.

**Household WEEE**
(see also WEEE from private households) also known as business to consumer (B2C), means waste that is separately collected for a producer compliance scheme (PCS) by a designated collection facility (DCF), a distributor, or under a system set up to accept WEEE from final holders.

**Household Waste Recycling Centre (HWRC)**
Means a place provided by a LA under relevant legislation at which persons resident in its area may deposit their own household waste free of charge. HWRCs can also be referred to as a Civic Amenity or CA site, or a Community Recycling Centre.

**Local Authority**
Means the local government body responsible for waste collection and/or disposal for a given area, and which itself provides or has provided under contract HWRCs.

**Non-household WEEE**
(also known as business to business (B2B), means waste that is collected by a PCS for non-household members, or by the non-household producer who, with agreement from their PCS, collect WEEE direct from customers.

**Producer**
Means an importer, manufacturer in the UK or own brand supplier.

**Re-use**
Means any operation by which whole items of equipment or parts or components that are not waste are used again for the same purpose for which they were conceived. Re-use of whole appliances is given priority.

**Re-used EEE**
Means WEEE that has been designated fit for re-use following assessment and if necessary, repair.

**WEEE from private households**
Refers to WEEE arising from private households and WEEE from commercial, industrial, institutional and other sources, which, because of its nature and quantity, is similar to that from private households¹. Waste from EEE likely to be used by both private households and users other than private households shall in any event be considered to be WEEE from private households. The decision to classify B2B WEEE as B2C WEEE must always be made at the point of collection, and must be justified. See the guidance on how to correctly identify B2B and B2B EEE here.

¹ WEEE Directive 2012/19/EU, Article 4 (h)
Set up

Contracts and partnership agreements

Enforcing compliance: the regulators

The UK environmental regulators for producers, producer compliance schemes and treatment facilities are:

**Environment Agency (England)**
Email: weee@environment-agency.gov.uk
Telephone: 03708 506 506

**Scottish Environment Protection Agency**
Email: producer.responsibility@sepa.org.uk
Telephone: 01786 457700

**Natural Resources Wales**
Email: weee@naturalresourceswales.gov.uk
Telephone: 0300 065 3000

**Regulatory Delivery (RD)**
Placed on the market regulations for WEEE and batteries, for distributors of WEEE and batteries, producers of industrial and automotive batteries.
Email: rd.enquiries@beis.gov.uk
Telephone: 020 8943 7272

There are no contractual requirements under the WEEE Regulations for LAs to provide WEEE collections, or for them to contract financially or otherwise with a Producer Compliance Scheme (PCS).

**Department for Environment Food & Rural Affairs (Defra)**
Defra are responsible for safeguarding the natural environment and lead on WEEE policy. Defra provides templates and guidance to ensure distributors fulfil their obligations under the waste electrical and electronic equipment (WEEE) regulations.

Guidelines and templates include:
- Customer information on distributor take-back obligations.
- Distributor record keeping.
- How designated collection facilities (DCFs) must manage separately collected WEEE.
- Producer compliance schemes’ (PCSs) responsibilities to maximise the separate collection of WEEE.

**Designated Collection Facilities (DCFs), Local authorities (LAs) and Producer Compliance Scheme (PCS) responsibilities**

DCFs are places where some household WEEE is collected before being sent for treatment, re-use and recycling. WEEE collected at DCFs will generally be recycled under a system financed by EEE producers.

LAs, or their contractors, run most DCFs at civic amenity and waste collection sites. Other organisations may manage DCF sites, including distributors, retailers, producers, charities and social enterprises.

---

DCFs and PCSs have a responsibility to maximise the separate collection of WEEE. They must adhere to the Code of Practice Collection of waste electrical and electronic equipment (WEEE) from designated collection facilities, this code sets out the rules for how agreements between DCFs and PCSs should work and:

- Why it exists and who it applies to.
- Minimum operational standards.
- Advice and guidance on what the contract could include.
- Enforcement action for non-compliance.

The Code of Practice states that LAs and PCSs cannot make a charge to the other for handling and/or collecting WEEE.

If an LA has nominated their sites as DCFs, then they need to abide by the Code of Practice and enter into a partnership agreement with a PCS. From the start, it’s important to ensure that:

- Provisions are in place at DCFs to separate the collected WEEE into five collection streams.
- All WEEE is transferred from the DCF to the PCS, and reasonable measures are in place to ensure this happens.
- LAs may choose to operate their own in-house CDF or contract an external waste management company to operate on their behalf. The PCS may choose which transport and treatment operator to work with.
- All parties involved can demonstrate compliance with the WEEE Regulations.

- Agreements with PCS are flexible to future changes.
- Evidence notes exist for all WEEE on site including re-used and recycled items.
- Communications are in place to raise awareness.

We recommend LAs, PCSs and site operators agree Key Performance Indicators (KPIs). These support effective site operations. Both LAs and PCS may include formal or informal targets for the tonnage of WEEE re-used or recycled from each category, against which performance can be monitored.
Local authority and site contractor responsibilities

LAs can subcontract DCF operations to a waste management company, a charity re-use organisation or a PCS.

If an LA subcontracts its site operation to a waste management company or other organisation the local authority remains responsible for ensuring:

• The appropriate environmental permit or exemption registration is in place.
• Compliance with the WEEE Regulations and this code of practice.
• The correct authorisations are in place when the WEEE is transported from the site.
• All separately collected WEEE is available to a PCS to collect for re-use or treatment.
• It gets approval from Defra to retain specific WEEE collection streams for re-use and treatment at its own cost.

The PCS contracted to the DCF is responsible for deciding which AATFs will treat the separately collected WEEE. If the waste management company or other organisation operating the DCF also runs an AATF they must get advance agreement with the relevant PCS to have the WEEE treated at their AATF site.

Evidence can only be issued on WEEE delivered from the DCF to the AATF where the PCS has agreed to this arrangement. See the WEEE evidence and national protocols guidance.

LA DCF operators can choose which WEEE collection stream they hand over to PCS and which retain for their responsibility (e.g. to offer or sell for re-use). If the DCF opts to self-treat, they must notify Defra by 31 January of relevant compliance year.

We recommend KPIs which could take the form of financial penalties and rewards. KPIs provide the incentive for contractors to achieve targets and will aid reporting and performance management.

Interactions with local re-use service provider

If the LA decides to sub contract the collection of re-use items it is important to liaise with the local re-use service providers if they will be handling the materials collected.

An LA appointing may need official tendering, service level agreement or other formal process. This is discussed in more detail in the Collection at Kerbside – Bulky waste section. WRAP has guidance on procuring bulky waste services, which is available here.

Recording tonnages collected

If recording tonnage use a weighbridge and record each WEEE category separately. If this is not possible the Furniture Re-use Network (FRN) has a Product Weight Protocol (previously FRN Average Weight list), that has a list of over 200 products and their individual weights. An annual licence is required to access this information. The fee will be from £300 depending on the type of organisation requesting it and what the data will be used for. Members of FRN have access to the list as part of annual membership fees.
**Case study:** Reflecting re-use in Local Authority contracts

The example below provides recommendations for contracts and partnership agreements. This is from a trial commissioned by WRAP to identify and review WEEE re-use in LAs. It follows a review of specifications for re-use of WEEE in Local Authority procurement, and contract management processes, and the role of the PCS in increasing WEEE re-use.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>LA</th>
<th>PSC</th>
<th>WMC</th>
<th>Re-use / Charity</th>
<th>Government</th>
</tr>
</thead>
<tbody>
<tr>
<td>Include re-use in Invitation to Tender (ITT)</td>
<td>Include re-use in ITT to pass responsibility to the PCS</td>
<td>Offer re-use service within ITT response</td>
<td>Work with LA, PCS and re-use partners to promote re-use</td>
<td>Liaise with LA to specify re-use requirements</td>
<td>Promote to LAs benefit of including re-use in ITT</td>
</tr>
<tr>
<td>Partner with local re-use organisations</td>
<td>ITT need to partner with local re-use organisations to realise social benefits and reduce cost</td>
<td>Audit and recommend local organisations within ITT response</td>
<td>Work with LA, PCS and re-use partners to promote re-use</td>
<td>Promote themselves to LA / PCS as potential partner</td>
<td>Promote to LAs benefit of partnering with local re-use company</td>
</tr>
<tr>
<td>Example text for ITT</td>
<td>Include good practice text on introduction or expansion of re-use service</td>
<td>N/A</td>
<td>N/A</td>
<td>Liaise with LA to specify re-use requirements for inclusion in ITT</td>
<td>Provide LA with good practice text</td>
</tr>
<tr>
<td>Communicate re-use service to public</td>
<td>Specify in the ITT that the PCS should provide communications within service offering</td>
<td>Respond to ITT stating support will be provided</td>
<td>Work with LA, PCS and re-use partners to promote re-use</td>
<td>Liaise with LA to specify re-use requirements to the public</td>
<td>Promote to LAs benefit of including communication on re-use in ITT</td>
</tr>
</tbody>
</table>

---

**Promoting re-use in collection**

Re-use is only successful if there is early intervention to separate quality items. Those with a part to play in maximising re-use, include:

- **Local Authorities** – promote re-use to residents (and businesses) and separate items from bulky waste collections and at HWRCs.
- **Producer Compliance Schemes (PCS)** – allow for re-use in partnership agreements with LAs and ensure hauliers protect items as necessary during transit.
- **Consumers** – householders separate items for re-use and buy reconditioned and refurbished goods.
- It is important to note that items delivered to a DCF and sent for re-use must be done in such a way that evidence can be issued to the PCS. This means the re-use organisation must be an AATF or have an AATF partner willing to issue the evidence to the PCS.

---

3 WEEE collection trials and monitoring: reflecting re-use in local authority contracts (EEE520-021). Research date: Nov 2015 – Feb 2016
Date: March 2016
Ensuring quality of items for re-use through communications

It is important to ensure that communication provided about re-use bulky collections or delivery to a HWRC for re-use includes information to ensure the item stays in working order and suitable for re-sale or second life. This information is important because it can reduce damage to items that would otherwise be reusable, extend the life of electrical products, and potentially increase income and reduce environmental impacts.

LA Bulky waste and HWRC web pages can provide messages on how and where householders can find their local re-use operators. Check with your delivery partners (e.g. DCFs site operators, or re-use organisations) to see if you can name them on your site. You should also include clear advice and guidance on the quality and type of items accepted.

WRAP provides information to householders on where they can deposit goods for re-use or recycling through the Recycling Locator. As well as including information on your website, LAs, DCFs and re-use organisations should ensure they are registered to appear on the locator.

WRAP has a whole suite of materials available on its website on how to communicate re-use and write a communications plan.

It is important to ensure the quality, and therefore value, of any item of WEEE collected for re-use is maintained throughout the collection process.

Case study: Wastesavers

In a recent trial by Wastesavers they delivered leaflets to approx. 10,000 properties in Newport, South Wales, promoting the new re-use collection service for SMW.

Also as part of the trial they redeveloped a Hotline script for inbound calls booking collections of other items to promote the new service. Working and non-working WEEE items were collected from domestic properties. Items collected were tested for safety with resalable items sold through the reuse shop; non-reusable items were either harvested for parts where possible and if not, then sent for recycling.

Both methods resulted in an increase in the number and weight of items collected and a re-use rate of 56%.

Wastesavers SMW leaflet

4 http://wastesavers.co.uk/
Through bulky waste collections

If items are due for collection by bulky waste collection crews for re-use, ensure call centre staff identify whether it works, is cosmetically sound, that is has the relevant safety labels and the householder accepts its re-use. The recent collection trials clearly showed the importance of training call centre staff, improving the scripts, keeping information short but detailed to ensure the amount of items collected for re-use is maximised.

If you do not offer a collection for re-usable items, provide your call centre staff with information of local service providers that do offer such a service.

Communicate to callers the importance of labelling re-usable items at the point of collection and handle with care to avoid damage and maintain the items quality and suitability for re-use (e.g. keep them safely stored and protected from rain).

LA call handlers are the first point of contact for residents, whether the LA provides the actual collection service or it is outsourced to a local re-use organisation.

It is essential they understand the re-use service available and are able to communicate this to the resident to ensure only items suitable for re-use are collected.

Call handlers should visit re-use organisations to see which items are wanted, watch the staff and see what happens to items that are re-usable and those that are not.

More detail on implementing re-use at as part of bulky waste collections is available here.

At the HWRC

HWRC staff need to be trained to communicate to site users about the availability of the re-use collection and to handle and store items to ensure they are of sufficient quality for the re-use market.

More detail on providing re-use at HWRCs is available here.
Raising public awareness of re-use

Greater public awareness of re-use and recycling is achieved through good practice measures, such as provision of marketing materials, developing public engagement and using front line staff to deliver the message.

Increasing visibility of WEEE re-use and recycling activity through promotional campaigns works well. Retailers can also make use of the WRAP’s WEEE toolkit to strengthen their message.

One such campaign was run as part of the WEEE Collection trials delivered by S2S Group which had established B2B WEEE collections in place. The trail assessed the extension of this service to include employees household WEEE. The poster in figure 1 was used to promote the service.

Over the trial period 137 products were collected and were unsuitable for re-use due to their physical condition and/or age. The trail did show that this is a viable method for recovering products for recycling. Alongside product condition, product age has a significant impact on resale, especially for small household appliances.

Figure 1: Promotional poster for WEEE collection trial
Retailer in-store communication (signage and public communications)

Defra is responsible for enforcing the consumer-facing obligations of the WEEE Regulations (2013). The Department for Business, Energy and Industrial Strategy (BEIS) is responsible for distributor obligations.

For retailers that need support with their WEEE communications, WRAP has developed a retailer toolkit. These materials ensure there is a consistent message available to all customers through all retailers and builds on recognition of our consumer awareness campaign materials.

HWRC signage and awareness raising

Signage should be simple and appropriate. Position signs so that they can be seen by incoming traffic and not obscured by containers or waste material. Signs supplemented with individual material stream signs at the entrance are useful.

The signs need to be good quality and of adequate size to convey the information. Further advice on suitable 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.

Include signs on or at containers. On metal containers, magnetic signs can be good as they are easy to remove and place onto the new empty container. Also the site staff and collection contractor must remember to remove them before the container leaves.

England and Wales can use the Recycle Now Pass it On material icons on signage with the other WRAP signs that are available in the Recycle Now Resource Library. Zero Waste Scotland have a range of free ready-made recycling poster templates available for download here. In Northern Ireland it is good practice to use the design guidelines produced by the relevant regional waste management group.

At HWRC, site staff training is important in raising awareness on re-use (as well as WEEE recycling) so they may clearly direct the public.

In-store communication must be made available (in writing on request) to householders on how they can dispose of WEEE and the environmental benefits of doing so (Part 5 of the WEEE Regulations 2013).
Signage can also increase the re-use and recycling rates. It’s important to strike a balance on too little and too much information. Signage good practice includes:

- Make signs legible.
- Raise signage above vehicle height, and/or angle to visible for incoming traffic; in England, Scotland and Wales use the WRAP Resource Library and suggested material stream colour (i.e. Magenta C) to increase legibility. In Northern Ireland use the waste management group logos (ARC21 and North West Region Waste Management Group).
- Include instructions on correct disposal to reduce contamination and increase efficiency.
- Use recognisable icons or pictures to help those with reading difficulties or users whose first language is not English. Recycle Now has a set of well recognised material stream icons, and Recycle for Wales has materials available in English and Welsh which are all available on the Resource Library.
- Sites that accept both B2C and B2B WEEE need to raise awareness of the different classification and controls and therefore the different payment regimes.

Further advice on site signage is in the National Assessment of Civic Amenity Sites report which details examples of good practice, an overview of relevant legislation, up to date statistics on HWRC provision and evidence-based approaches to assessing and improving HWRC performance.
Collections at Household Waste Recycling Centre (HWRC)

**Re-use at HWRCs**

All items entering a HWRC are waste and must either leave with a Duty of Care Waste Transfer Note or Hazardous Waste Consignment Note, or as a re-use item. Re-use could involve segregation for off site testing and resale or on site testing and resale.

If onsite testing and resale occurs, the re-use organisation and LA must ensure compliance with all relevant health and safety and environmental controls. The re-use organisation should be an authorised approved treatment facility (AATF).

Choices available to manage re-use at an HWRC include:

- A re-use service provider could staff the on site facilities themselves.
- The site operator, LA or private company, could set up and run a re-use shop providing the testing and resale activity.

- Site staff could separate reusable items with the support of the organisation that will receive the re-use items.

As with the kerbside, HWRC site staff should visit re-use facilities to see what happens to items once they have left site. This provides motivation in maximising diversion for re-use.

HWRCs do not offer secure data removal therefore donors need to be made aware that it is their responsibility to ensure their data is removed before depositing the item on site for re-use. Some re-use service providers do provide secure data removal.

WRAP has further information on how to include re-use in LA HWRC procurement [here](#).

**Storage of WEEE for re-use and recycling**

An LA must include security in its contract with a site operator. This protects re-usable items in the event that vandalism occurs. It also provides clarity on who is responsible for the repair and financing if any damage occurs.

As a minimum DCFs should set aside enough space for the separate collection of five WEEE collection streams. Where space is restricted, you can apply for permission to store mixed WEEE. Rules pertaining to hazardous waste must be met.

**Preventing loss of items to third parties/theft or leakage**

IT equipment and items not locked are theft targets, this leads to WEEE leakage. Material leaks could end up being treated through unapproved routes and illegally exported. In addition, items that are lost to re-use prior to measuring the weight adversely affects the UK’s ability to meet future collection targets.

Site operators should prevent DCFs being the source of such losses. Theft from DCF sites outside of the Producer Compliance Financed scheme is estimated to account for 96kt (6% of WEEE generated). Due to the value of WEEE items and components (which fluctuates depending on market conditions), theft from the WEEE system is believed to be relatively widespread rather than isolated incidents.
The quantity of WEEE generated in 2015 is estimated to be 1,528kt, made up of:

- **679kt** of reported WEEE (44%). This is documented and controlled within the regulatory system.
- **475kt** of unreported WEEE (31%). This material is outside the regulatory system and not as closely controlled or monitored as above.
- **366kt** of WEEE lost from the system through the residual waste stream or components taken from cooling equipment (24%). This material is unlikely to be treated to correct standards.

### Factors to consider
Several factors influence collection of WEEE:

- Location and size layout.
- Staff interaction with site users.
- Size of containers and their location on site.
- Site throughput.
- Traffic controls.
- Availability of re-use facilities.

### Staff interaction with HWRC users
Staff interactions improve segregation and lower contamination, resulting in higher re-use and recycling rates. Ways that staff can interact with site users include:

**Greeter:** At the entrance, staff can direct users to the correct bay or container and advise users of the need to separate waste, and dispose of unsafe waste properly. The greeter can also check van use and potential trade waste abuse.

### Location and size layout
Location and socioeconomic factors affect the type and quantity of WEEE brought to a site. An LA should look to authorities with similar demographics to identify good practice.

More information on WEEE arising in the UK can be found in WRAP’s WEEE Flows report.

Good practice includes:

- Store items in locked containers, or inside a lockable building overnight.
- Ensure suitable fencing around the site (e.g. steel palisade fencing).
- Lock the site gates at night.
- Use CCTV and link to loudspeakers (that tells trespassers “this site is private property”) to activate on detecting motion.
- Employ manned security for sites with significant security problems.
- Link with the local police to ensure a quick response if and when needed.

Size and layout impacts staff ability to separate WEEE. Space limitations may reduce the number of groups and tonnage collected. Nevertheless small sites can still show value if other matters discussed further below e.g. staff interaction, signage and having suitable containers, are managed well.
Point of disposal: Sites where staff advise users of the correct container or bay to dispose of items have a higher re-use and recycling rate. It’s not necessary for staff be permanently based at the WEEE containers.

Temporary WEEE staff: LAs can manage cost by recruiting a dedicated temporary staff member to promote WEEE recycling services (e.g. through a one year contract).

Encouraging re-use: Staffing of re-use containers could be done by someone from the re-use organisation that will handle and process the items collected for re-use, whether this happens on or off site. This ensures good quality items are collected that have a re-use value and can free up site staff for other duties. Alternatively, site staff can oversee the container (if there are adequate numbers of personnel onsite).

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

Public access to containers
While site staff interaction is useful, access to containers and the size and location of the containers also matter. Containers that are visible and accessible are easier for the public to use.

Site arrangement: The container used and the ability to maximise load and manage health and safety of site users and staff will help you decide whether the public may have direct access. Preferences will differ between site operators.

Case study: Cardiff HWRCs
At HWRCs in Cardiff, the public dispose of SMW, energy efficient bulbs and fluorescent tubes directly into relevant containers and leave their cooling appliances in a designated place. The benefit is, it leaves site staff available to fulfil other duties on site. However, for some WEEE groups, site staff prefer to load containers themselves, for example, stacking the display screen equipment (for health and safety reasons and to maximise the load).

Maximising re-use
We recommend sites have a large covered container or a shed to house reusable items. This is to ensure that re-use has maximum visibility and users are aware that re-use occurs on site as well as providing a weatherproof and secure place. The space needed depends on the activities; for example, storage only (before removal off site) would need less space than storage, functionality testing and resale on site.

For the sites where LDA are collected separately, the site staff will stack these (and CRTs) 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.
Location of container

Visibility of WEEE groups such as small mixed WEEE increases donation. However, there is a risk that contamination may occur (with different WEEE categories). Therefore good signage is important to help users identify which items are to be deposited where.

Good practice is to keep all public areas away from the servicing area. If not possible provide an alternative drop off point, with site staff moving the items afterwards with suitable handling equipment.

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

• A barrier to prevent public access unless allowed by a site worker i.e. only when safe.

• Presence of site worker at suitable location to prevent public access when service vehicles are on site (unless the whole site is closed during servicing).

Single level sites: Locate containers or the area designated for WEEE groups in the same place. It strengthens the message that different WEEE groups can all be recycled and re-used. For example when disposing of their broken televisions users may learn that they can also bring their used energy efficient bulbs to the site.

Split level sites: To maximise recycling and re-use of large domestic appliances and small mixed WEEE, it is good practice to collect these two streams separately.

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.
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.

Highlight to site staff and public items for the WEEE container. As a minimum, a sign to prevent the greatest hazard, i.e. gas cylinders, should be place near the small mixed WEEE container access point.

Where space allows, 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 near the entrance to the site so these items are disposed first reducing chance of wrong deposit.

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.
• Grass cuttings within a lawn mower.
• Petrol powered equipment including lawn mowers.
• Vacuum bags within vacuum cleaners.
• Cooking oil within deep fat fryers.
• Food stuffs or other wastes within fridges and freezers.

Ideally householders will have removed these materials before depositing at a HWRC. If necessary, site staff can remove contamination, if safe and suitable to do so.

Non-targeted and contaminated items should be in a suitable container on site. Siting of such containers near the WEEE containers may support segregation.
**Type of containment**

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

For CRTs, and displays (e.g. TVs and monitors), lamps (not filament light bulbs), and all other WEEE, containers must be provided. For large household appliances and cooling equipment, space for containers or an impermeable surface must be provided.

On sites with single level architecture, multiple smaller containers are an alternative if there is no room for gantries alongside larger containers. Store any leaking items or reusable ones undercover to protect from damage.

PSCs should provide collection container with collection method arranged in conjunction with the LA. The PCS and site operator should agree the most suitable collection method.

**Staff training and motivation**

Well trained and motivated staff will be crucial to the successful segregation of items for re-use and recycling at HWRCs.

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 LA and the site contractor. The Household Waste and Recycling Centres Guide covers incentives in more detail.

Training of staff members involved in segregation of items is important, whether it is a dedicated role or the responsibility of all site staff. 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 separated 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 re-used or recycled (where does it go)?

A PCS may provide training material and may even be in a position to offer training. Well trained staff should:

- Be aware of the WEEE groups.
- Know what forms contamination.
- Know how to identify reusable items if applicable.
- Know how to safely handle items.
- Know what happens on collected WEEE and the benefits of re-use or recycling.

We recommend training materials to be available on site for new and agency staff to read and to be included in the staff induction.
Identifying reusable WEEE

Include re-use identification in site staff training. This can take many forms:

• Re-use organisation staff member being on site. Identifying acceptable and unacceptable items with the site workers and explaining why such a decision has been made and key features to look for.

• Site staff visits to re-use organisation to see treatment of WEEE removed from site. How it is refurbished, tested and what happens to items that are not re-usable.

• A visit from the re-use organisation to advise on acceptable and unacceptable items.

Division of staff roles and responsibilities

Roles and responsibilities of staff on site are important for the safe management of the site. If members of staff only have responsibility for the collection of WEEE, it can improve segregation. If staff have other responsibilities, it may be useful to have incentives to ensure separation. Some areas have a dedicated staff member to manage WEEE.

Handling re-usable and recyclable WEEE

Re-use good practice is to ensure WEEE is treated with due care. Train staff to carefully handle and protect items from weather damage.

Health and safety

Health and safety needs inclusion in site staff training. Guidance is available from the Health and Safety Executive (HSE) on safe management of materials at HWRCs. Occasionally, guidance may be contrary to other drivers such as maximising loads by container. In these instances health and safety takes priority.

Train staff in manual handling. When handling items, staff need to work within health and safety guidelines and use suitable mechanical loaders and hand lifting equipment such as sack barrows and trolleys, pallet handlers, bucket lifts, and pallet trucks. Advice is available from the HSE on the storage of hazardous wastes at HWRCs.

Uplift of WEEE

Timing of collections and the methods used are important in maximising re-use and recycling. It is necessary to balance the need for on site capacity with environmentally and economically efficient transport (i.e. full loads). Moving half loads is inefficient, while full or overflowing containers can be dangerous and give the public a negative view. Site staff can identify collection frequency and uplift need taking account of other influencing reasons such as peak flows, other material collections and expected WEEE. For example, only small busy sites with a high daily throughput are likely to need daily collections.

The end destination will also need to be included in decisions around uplift to ensure they are able to manage receipt of loads. They may also be providing the haulage of the re-usable goods.
Liasing with haulage contractors

Direct liaison with the haulier and using the PCS call centre can both represent good practice if the communication routes are identified from the start and reviewed regularly.

Suggestions for achieving and keeping a good working relationship include:

• Tailor the arrangements to suit individual needs and be flexible.
• Try understand the pressures on others.
• Keep regular contact to show commitment to the arrangement.
• Use the telephone as well as email as many people appreciate personal contact.
• Highlight positives, not just complain about poor practice.
• Be prompt responding to emails and phone calls.

Case study: ERP

ERP is the Producer Compliance Scheme for WEEE and batteries contracted to collect and treat these streams from all the HWRCs in Northern Ireland.

ERP’s advice to the councils is to contact them when the HWRC reaches approximately 75% capacity. However, as the collection service is well established the sub-contractors now collect on a weekly or fortnightly basis. The exceptions to this are lamps and batteries, which are collected ad-hoc once the bins are at 75% capacity, and the HWRC requests a collection. This also applies to 20’ ISO and 20’ Ro-ro containers (which are used on busy sites for the Display and SDA/mixed WEEE streams).

Alternatively, DCFs may have regular scheduled collections that are daily, several times per week, weekly or monthly depending on the WEEE group, size of the container and how quickly it fills. Regular servicing works well on some HWRCs.

Good practice is for a site to carry out a booking procedure for uplifts. A booking reference number recorded in a site log book, with date of order and confirmation of date of collection and signed by the staff member. This allows KPI monitoring and ensures the site is aware of the uplift asks that have made.

Timing of collections

Haulage contractors should be made aware of times to avoid the site. Scheduling collections is in the code of practice. Ensure containers are clear before busy or peak times.

Where servicing and public vehicle access are not separate, collections should take place out of site opening hours. Where this is not possible, ensure staff are satisfied collections do not interfere with their work or create a hazard.
Liaison with an authorised approved treatment facility (AATF) treatment operator

Liaison ensures both parties are aware of each other’s needs. Training of DCF site staff should include information by the treatment operator on their acceptance criteria and what they will do with contamination. Training could also include a visit to the treatment facility – good practice for sites where problems have occurred. Following the impact of good and bad loads, removes poor practice.

The AATF who first receives the WEEE from a PCS and AEs will issue evidence notes.

When WEEE goes direct to an authorised treatment facility (ATF) for refurbishment and re-use under a contract with an AATF, the AATF can issue evidence notes for the reuse. Both have a duty to keep records showing the audit trail of WEEE refurbished for reuse.

WEEE evidence is proof of re-use or treatment by an AATF or export of whole appliance by an AE. Evidence is collected in the form of evidence notes issued by the WEEE Settlement Centre.

An AATF can issue evidence on UK WEEE that is:

- Refurbished for re-use.
- Treated.

Full guidance on WEEE evidence and national protocols can be found [here](#).

The DCF operator is required to conduct a Duty of Care audit and to report the end destination of recyclate to Waste Data Flow. It is good practice for the LA to conduct these audits, 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 LA request evidence of audits and outcomes conducted at the AATF.

DCFs must ensure the WEEE (classed as household) collected on site is handed over to a PCS for proper treatment and recycling or re-use or self-cleared as notified to Defra.

LA DCFs must notify Defra in writing by 31 January each year of any WEEE collection streams they intend to retain instead of passing to a PCS. The necessary details and data must be provided via an email to: [weee@defra.gsi.gov.uk](mailto:weee@defra.gsi.gov.uk)

Managing non-household WEEE

DCFs can accept businesses WEEE similar to B2C (at the discretion of an LA). Non-household WEEE can be accepted at licensed sites, for a full list of LA DCFs please refer to this directory. Non-household WEEE must be kept separate from any B2C WEEE.
Many DCFs choose not to accept commercial waste to avoid:
- Handling money on site.
- Managing the volume of waste on site.
- A reduced service available to residents.

If trade waste is not accepted at the site, it is important to first correctly distinguish between commercial (B2B) and household (B2C) WEEE, guidance can be found here.

Common methods to manage the illegal deposit of commercial trade waste include:
- Van bans.
- Commercial vehicle controls and permits for householders.
- Disclaimer forms.
- Height barriers.
- Site ‘greeter’ or security guard.
- Use of Automatic Number Plate Recognition (ANPR).

Methods for managing trade waste abuse are in the Household Waste Recycling Guide.
Collection at kerbside – bulky waste and small mixed WEEE

Bulky waste

Bulky waste WEEE has a number of possible disposal routes; to the local HWRC, waste transfer station, treatment site or LA depot. There is no preferred option.

LA call centre staff must log collections and check against those of the relevant collection crew. This data verifies collections and delivery to approved facilities.

Contractual arrangements

Bulky waste re-use service contracts should not be made up from a loose partnership of organisations or informal agreements but rather a formal commitment for the service providers to perform towards targets. A formal service agreement should be put in place to commit the provider to a minimum level of service and bind them to the achievement of the targets.

An authority needs to add the following into their contracts for bulky waste collections for WEEE:

- Memorandum of Understanding or Service Level Agreement if appropriate.
- Targets to maximise re-use and recycling.
- Responsibility for recycling through approved routes.
- Data reporting requirements on re-use and recycle (number of items, weight, and proportion).
- Provision for local approved re-use organisations to obtain reusable items (if they do not provide the collection service themselves).
- Customer care requirements e.g. response times and customer satisfaction.

For more information, see WRAP’s Bulky Waste Guidance for the key principles and legislation relating to the procurement of services by LA when commissioning and procuring the Legal Framework for Local Authorities. See also WRAP’s guide to introducing a re-use focussed bulky waste collection.

Collection crews

Provide manual handling training to collection crews. Further good practice advice is available from the HSE. Include advice on protection for crew collecting re-usable items.

Include customer care training for crews as they interact with the public.

WRAP has developed materials to guide LAs, waste management companies and third sector organisations in how to reap the financial, social and environmental benefits of re-use through a successful partnership.

Local authority bulky waste services are for items too large to go in bin bags such as furniture, bric-a-brac or household WEEE.
Collection arrangements

Collection staff will need right equipment and appropriate health and safety training. Good practice:

- Treat items as new products and package in protective wrapping if necessary.
- Use suitable manual handling equipment.
- Use vehicle features as intended e.g. move tail lift up and down and not push.
- Do not stack items.
- Separate re-usable and recyclable to minimise potential damage or contamination.

Handling and storage

Handling and storage of re-usable or recyclable items varies. Good practice advice for a householder prior to collection includes:

- Leaving item inside the home until collection day.
- Securing cables and loose parts.
- Packaging the item to protect it when moved.
- Removing food from cooling and cooking equipment.
- Removing liquids or other waste from any items (e.g. oil deep fat fryers; full vacuum bags etc).

Maximising re-use – Protect items always to maximise re-use. Items can become unsuitable for re-use before collection if householders do not protect them. Similarly damage can occur during collection if not handled and loaded correctly.

Maximising recycling – Maximise load rather than protect items. Items can be stacked (as long as they can be secured), and not require protective packaging.
Small mixed WEEE

Bring banks
LAs now manage small mixed WEEE (SMW) bring banks. An LA can use metal banks with a bucket opening to limit the size of item. The bank has a cage inside to allow swapping with an empty one or for ease of carrying items into a vehicle.

An alternative bring bank container is one that Westminster City Council use. It has wheels with a secure drop door/panel at the back enabling items to be removed by hand and transferred into boxed cage vehicles.

Many Local Authorities provide kerbside collection for small mixed household WEEE (SMW).

Case study: Westminster City Council

All waste electrical and electronic equipment is collected separately from general rubbish. Small domestic appliances are collected from the small appliances recycling bins and are taken to Sweeep Kuusakoski, Sittingbourne, Kent. Westminster City Council provides information on acceptable items and where the e-waste bins can be located. Larger electrical appliances can be collected by the bulky waste service for a fee.

WEEE amnesty / mobile collections

In densely populated areas mobile WEEE collection service can be provided to maximise SMW recycling.

Site a suitable vehicle for a short period (e.g. three hours) at a market or housing estate. Liaise with the Regulatory Body to ensure the collection adheres to all relevant regulations.

Student collections

An LA can set up student SMW collections at the end of the summer term. It is suggested to liaise with the local college or university to help promote the idea and raise awareness among the students. It may even be beneficial to provide some sort of collection on campus; however, this would need to be agreed by the PCS and consideration given to whether it is value for money.
Retail take-back

Under UK WEEE regulations, retailers should advise their customers of an available take-back scheme, in store, on delivery or via a HWRC. This final option is only available to a retailer who is a member of a Distributor Take-Back Scheme (DTS).

UK retailers must provide a way for customers to dispose of their old household electrical and electronic equipment when they sell them a new version of the same item. The waste electrical and electronic equipment (WEEE) regulations apply regardless of how the products are sold, whether directly to consumers or via the internet, mail order or telephone.

Retailers must either:
• Provide a free, in store, take back service to their customers or
• Set up an alternative, free take back service

If they don’t have their own take back service, they must join the Distributor Takeback Scheme (DTS).

DTS was set up in 2007 and supports a network of WEEE collection facilities. Many retailers have joined the DTS of which the funding goes to support HWRC’s. Retailers that have not joined the DTS are required to take-back WEEE from householders free of charge.

For more information, refer to retailer and distributor responsibilities guidance here.

Case study:
Argos incentivised gadget trade-in scheme

Customers take their old devices to the till where a Customer Advisor will check the re-useable value. If the customer is happy with this value the transaction will go ahead.

The customer receives an Argos gift voucher for the value of their recycled gadget which they can spend on anything in the catalogue.

The customer benefits by being able to recycle their gadget so that it can potentially be re-used, and by realising the value of their old gadget.

Partnership with a service provider
This secure package is then sent to an IT Asset Management (ITAM) company where the data is wiped. The gadget is then assessed to see if it can be refurbished so that it can be re-used.

If it cannot be refurbished or repaired then it is broken down so that the parts can be recycled.

The refurbished gadgets are resold by the ITAM in the UK and throughout Europe. See more here
Household awareness and consumer information obligations

As part of the WEEE regulations, retailers must make customers aware of recycling choices. As part of the UK Waste Electrical and Electronic Equipment (WEEE) Regulations, retailers are required to provide information to their customers detailing their recycling choices in addition to:

- Requirements of the UK to minimise the disposal of WEEE to landfill, and to achieve high levels of collection of WEEE for environmentally sound treatment.
- The collection and take back systems available to them.
- Their role in contributing to the reuse, recycling and other forms of recovery of WEEE under the regulations.

- The potential effects on the environment and human health as a result of the presence of hazardous substances in EEE.
- The meaning of the crossed out wheeled bin symbol.

Advice on the wants is available from Consumer Information Obligations (CIOs).

Manufacturers and retailers have two key consumer obligations:

1) To provide information to consumers about:

- Their role in recycling and recovery.
- The environmental impacts of hazardous substances in EEE and WEEE.
- The importance of separating WEEE from other waste streams.
- The meaning of the “crossed-out wheele bin” symbol and other markings related to recycling.

- Where they can return, have collected or safely deposit packaging and WEEE for treatment and recycling free of charge.

2) To establish a take-back system that customers can use to dispose of waste free of charge, companies can either:

- Establish an in-store take-back system and/or
- Join a Distributor Take-Back Scheme (DTS).

Retailers must display information in a prominent position preferably at the entrance of the store.

Recycle Now has materials to help retailers raise awareness and meet their obligations and provide a consistent message to customers.

Store policies

In-store

All retailers must provide in-store take-back unless they are a member of the DTS. DTS members may also choose to accept WEEE in-store.

It is essential staff receive training and made aware of the opportunity for customers to return their products to stores. This will ensure there is consistent and reliable messaging which will help staff to provide good customer service.
On delivery of new appliances
Retailers (including some that are members of the DTS) provide take-back for large and small appliances when delivering new ones.

Delivery crews must have good levels of customer service and treat items removed with equal care as those delivered.

The retailer may provide an appointment day and time for delivery (and therefore collection) and may enter householders’ property. Sometimes instructions are given to householder such as: unplug and defrost old freezers, or disconnect old washing machines (unless this is paid for as part of the service).

Online sales
Distance sellers, for example internet retailers, must either join the DTS, offer in-store take-back through one of their local stores (where these exist) or provide the customer with an alternative local route for free take-back.

The distributor must tell customers how they can dispose of WEEE, for example via their catalogue, website, sales receipts, or through a leaflet included with the purchase.

Staff awareness
Inclusion of brief training materials in staff induction packs is an example of good practice. For existing staff, provide short one-off training sessions. Provide refresher courses periodically.

One high street retailer, for example, provides staff with specialist training which is specific to their procedures and refers to:

- Legal obligations under the WEEE Regulations.
- The meaning of the crossed out wheelie bin symbol.
- The environmental impact of not recycling WEEE.
- The obligations of take-back or DTS membership.
- Where customers can recycle their WEEE (nearest DCF) and find out more information.
End user business

Arranging a WEEE collection

B2B producers are responsible for items collection, treatment and disposal unless they have put in place other approved arrangements.

Producer obligations do not extend to the transportation of WEEE away from the end-user and does not extend to doorstep collection.

Businesses, if outsourcing, must ensure items are managed by registered companies. You need to confirm that the organisation collecting WEEE can legitimately transport, handle and treat the different types of WEEE. Some WEEE disposal may be free if:

- It was sold to the company after 13 August 2005.
- The company is replacing it with new equivalent Electrical & Electronic Equipment (EEE).
- The EEE is rented or leased.

Any business considering buying or leasing EEE should speak to their supplier. In normal circumstances a business should call on a PCS to collect and treat the WEEE unless the producer has made alternative arrangements with the business through the sales contract.

A list of registered WEEE producers and their compliance schemes is available from the Environment Agency, Natural Resources Wales, the Scottish Environmental Protection Agency and the Northern Ireland Environment Agency.

If the producer refuses to take responsibility for non-historic WEEE (i.e. an item produced after 13 August 2005), a business should contact the appropriate environmental regulator and inform them that the producer is not fulfilling its obligations under the WEEE Regulations.

For dual-use equipment the producer must pick up the costs, but this does not necessarily include the costs associated with the collection from the customer. End user businesses may be required to take the dual-use equipment to a suitable collection point where disposal will be free. This could be an LA site that accepts trade waste.

There are some circumstances where a business produces WEEE where they may have to pay for the recycling. This may be the case if a business:

- Is discarding EEE which was purchased before 13 August 2005 (known as historic WEEE), and the business is not replacing it with equivalent EEE.
- Cannot trace the producer or its compliance scheme.
- Cannot negotiate an alternative arrangement with the producer.
- Wishes to control the recycling route (such as for data sensitive WEEE).
- The WEEE has a resale or re-use value (such as PC/ICT equipment).

There are also circumstances where the organisation may wish to negotiate with suppliers about who takes responsibility for EEE at the end of its life. A business may decide to accept responsibility and negotiate a lower purchase price. However, this will mean you may be left with future disposal, recovery or recycling costs.

If a business does have WEEE to recycle, it has a Duty of Care to act responsibly and ensure that the contractor it appoints to collect the WEEE is legitimate and has the appropriate licences and permits.
A business should ensure that:

- The haulier or Approved Authorised Treatment Facility (AATF) collecting the WEEE is a registered waste carrier or other approved person.
- The waste is accompanied by a waste transfer note or hazardous waste consignment note (as appropriate).
- The waste is taken to a suitable facility to be treated and recycled, i.e. the site has a permit or licence that allows them to accept trade waste.
- It obtains and keeps proof that WEEE was given or sold to a waste management (or asset management) business, and was treated and recycled in an environmentally sound way.

Alternatively a business may choose to deliver the WEEE directly to an appropriate facility. This could be a re-use organisation or a private contractor (e.g. registered ATF or commercial DCF). The business will need to:

- Adhere to site safety instructions and use Personal Protective Equipment (PPE) if necessary and requested to do so.
- Be aware there will be a charge for recycling WEEE – there may be a minimum charge or quantity of waste accepted.
- Segregate WEEE groups if required by the site to do so.
- Ensure the site is permitted/licensed to accept the WEEE.
- Classify the waste using the European Waste Catalogue (EWC) Code(s).
- Keep full records of waste transfer notes for auditing purposes.

Businesses may need to register as a hazardous waste producer, for an overview of producer responsibilities review: https://www.gov.uk/dispose-hazardous-waste/producers-and-holders.

All types of premises that produce hazardous waste are now exempt from registration if no more than 500kg of hazardous waste is produced in a year.

If a business has a small amount of hazardous waste on site, they can ask the collector (or ‘carrier’) if it runs a multiple collection round. If it does, the carrier can fill in most of the consignment note which must stay with hazardous waste until it reaches its final destination.

All WEEE from a business should go through an AATF or ATF for treatment. The European Waste Catalogue (EWC) should be consulted before disposing of or recycling all waste.

Data security

For businesses:
Organisations need to ensure the re-use or recycling route they choose for their EEE is certified by an approved data destruction service to ensure all data left on the equipment is eradicated. The UK government’s National Technical Authority for Information Assurance (CESG), advises organisations on how to protect their information and information systems against today’s threats in addition to providing guidance on the safe destruction and disposal of valuable assets.

Organisations and individuals within organisations have a duty of care to ensure that any confidential data they hold is not released in an unauthorised way, most notably data relating to employees or customers.

---

**The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)**

GDPR is the new legal framework enforceable from May 25th 2018. It requires data controllers and processors to comply with requests for erasure of personal data and have proof of this erasure. The Regulation mandates strict penalties; organisations found in breach of the Regulation can expect administrative fines of up to 4% of annual global turnover or €20 million – whichever is greater.

For further information on the GDPR, see the Information Commissioner’s Office website.

---

**For recyclers and waste disposal organisations**

A waste disposal contractor disposing of WEEE that may contain information covered by the Data Protection Act 1998 must hold a relevant certificate in information security management or equivalent. Whether the product is to be sent for re-use or recycling it is advisable to understand how the items are handled, tracked and the data security is managed.
Data management

Data management and reporting is important to ensure that there is a record of WEEE collections and transport to track where items are sent and the number or tonnage of those items.

NOTE: WEEE data evidence only counts when it is received at a first AATF where the weight is recorded and reported to the PCS. The PCS will then report this back to the LA or their contractor.

Duty of care

The Duty of Care Regulations require businesses and the public to ensure that any waste that leaves their premises is moved by a registered waste carrier. The list of registered waste carriers is available from the Environment Agency for England, Natural Resources Wales, the Scottish Environmental Protection Agency and the Northern Ireland Environment Agency.

In order to demonstrate compliance with Duty of Care regulations it is essential to record who has removed waste from the premises. Waste Transfer Notes must be completed and held by involved parties. These detail the amount of waste sorted for recovery or treatment and the type of treatment. There is no requirement for householders to complete Waste Transfer Notes.

Method of reporting

Recording of data can be manual or electronic. For example, many LA call centres record bulky waste collections electronically and print a list of collections for their crews on a daily basis. However, at sites or on collection rounds it may be easier to record data manually. This data can be subsequently transferred to a database which is maintained, in an easily accessible format and available to auditors on request.

It is essential that household and non-household WEEE are identified and recorded separately, especially when collected at the same DCF. Guidance is available on how to correctly identify Business to consumer (B2C) and business to business (B2B) EEE and WEEE here. At DCF the reporting process depend on the reporting requirements of the PCS.

Proportion of re-use and recycle

As data is needed by a number of stakeholders on the WEEE that is re-used or recycled, it is important to record this as accurately as possible. Usually, 100% is not re-used and recycled therefore it is important to have mechanisms in place for reporting:

• Tonnage/number of items removed from site, collected through takeback and bulky waste collections.
• Tonnage/number of items removed that have been re-used as whole appliances, re-used for parts, recycled or identified as non-WEEE residual waste.
• Traceability of the proportion of WEEE that is recycled/recovered at the AATF/ATF.
• Whole WEEE received by an approved re-use operator / re-use AATF and subsequently tested, repaired or refurbished and placed back on the market for re-sale; and
• WEEE received by an AATF for recovery / recycling (dismantling in to component materials).

If recording tonnage use weighbridge and record each WEEE category separately. If this is not possible FRN has a Product Weight Protocol (previously FRN Average Weight list), that has a list of over 200 products and their individual weights. It is now necessary to purchase an annual licence to access this information, the fee will be from £300 depending on the type of organisation requesting it and what the data will be used for. Members of FRN have access to the list as part of annual membership fees.

Some of the above data may be required by an LA for non-WEEE Regulation purposes, for example to report on re-use figures to Defra, Welsh Government, Scottish Government and NI Government. Data should be made available from the AATF to the PCS, regulatory body, waste management company or LA for audit upon request. It is most helpful to provide data on a site-by-site basis where possible.

### QMS and EMS

Quality Management Systems (QMS) are a method for ensuring and demonstrating to stakeholders that proven processes are in place to meet reporting needs.

Typically, requirements of a QMS include:
- Procedures that cover all business processes.
- Monitoring processes to ensure the procedures are effective.
- Ability to take corrective action when necessary.
- Record keeping.
- Continual improvement.

An Environmental Management Systems (EMS) is a planned and documented approach to recording and limiting an organisation’s impact on the environment. Some organisations have adopted the framework specified in national or international standards, which set out the requirements of an EMS, and have had their systems externally assessed and certified against these, others have developed their EMS in a more informal way.

It is good practice for businesses that collect and re-use or treat WEEE to adopt both internationally recognised QMS and EMS standards, for example ISO9001, ISO14001 or the EU EMAS (Environmental Management and Audit Scheme).
WRAP’s vision is a world in which resources are used sustainably.

Our mission is to accelerate the move to a sustainable resource-efficient economy through re-inventing how we design, produce and sell products; re-thinking how we use and consume products; and re-defining what is possible through re-use and recycling.

WRAP believes content as correct as at the date of writing. However, factors such as market prices and information are subject to change and users of the guidance should check quoted information sources to confirm the current situation. In addition, care should be taken in using any of the information provided, as it is based upon case examples which are specific (such as scale, location, tender context, etc.).

The guidance does not claim to be exhaustive, nor does it claim to cover all relevant procedures. While steps were taken to ensure accuracy WRAP cannot accept responsibility or be held liable to any person for loss or damage arising out of or in connection with this information being inaccurate, incomplete or misleading. It is the responsibility of you the user to ensure it is relevant to their specific requirements.

The listing or featuring of a particular product or company does not constitute an endorsement by WRAP and WRAP cannot guarantee the performance of individual products or services.

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 WRAP’s Terms & Conditions on the WRAP web site.