



Call for evidence on reforming the producer responsibility system for waste electrical and electronic equipment (WEEE)

March 2024

Section 1: Full Net Cost Recovery

1. Considering the points for and against set out in the call for evidence, please select which of the following activities producers should finance the cost of:
 - a) **WEEE in the residual waste**
 - b) **Fly-tipped WEE**
 - c) **Littered WEEE**
2. Please provide evidence of the volume (tonnes) of WEEE arising at UK level and/or by nation level in residual waste.
3. Please provide evidence of the volume (tonnes) of WEEE arising the UK level/and or by nation that has been fly-tipped.
4. Please provide evidence of the volume (tonnes) arising at UK level and/or by nation that has been littered.
5. Please provide evidence of the net costs per tonne for collection of WEEE arising in residual waste.
6. Please provide evidence of the net costs per tonne for collection of WEEE that has been fly-tipped.
7. Please provide evidence of the net costs per tonne for collection of WEEE that has been littered.
8. Please provide evidence of the types of WEEE commonly discarded in the residual waste stream.
9. Please provide evidence of the types of WEEE commonly fly-tipped.
10. Please provide evidence of the types of WEEE commonly littered.

All businesses should be required to report on the above statistics and for these to be publicly available. In addition to the Government's Waste & Fly-tipping statistics we do not have any further information to add.

Section 2: Allocation of costs for the collection and treatment of household WEEE



11. Do you agree or disagree that we should establish a rolling 3-year process for setting the financial obligations of producers to create more certainty in the system? Please select one of the following options:

Agree.

12. Please provide evidence of whether or not setting a rolling three-year forecast would provide more certainty in the system and act to encourage increased investment by the treatment sector.

We agree with the evidence presented in Defra's Case for Change. If yearly target setting is causing difficulties within the system, then we agree that targets should be set on a rolling 3-yearly basis.

13. Please provide evidence of whether or not a three-year forecast to set financial obligations be supported by a three-year minimum PCS-DCF contract duration in order to encourage increased investment by the treatment sector?

14. What are your views on the idea of establishing an allocation system as an alternative way to set financial obligations on producers and guaranteeing the financing of Local Authority collections?

15. Please provide evidence on the estimated costs and monetised benefits of both establishing and operating such a system.

16. Please provide evidence of any other alternative approaches, not described in Chapter 2, which you think could be suitable for allocating financial obligations on producers.

Section 3: Prevention of waste and increasing re-use of unwanted WEEE

17. Do you agree or disagree that giving a higher weighting to tonnage collected by PCSs for re-use (or preparation for re-use) towards their collection targets, than tonnage collected for recycling would incentivise greater re-use (or preparation for reuse) of WEEE? Please select one of the following options:

Unsure.

18. Please provide any evidence you have to support your answer to question 17.

We support Defra in incentivising higher collection of WEEE materials for re-use over recycling. However, we foresee unintended consequences with the proposed policy measures as it has the potential to reduce the overall amount of collected waste. This is because if a PCS has reached its reuse target, they then become disincentivised to continue collecting WEEE for reuse. Similarly, we would expect WEEE collection for reuse or recycling to decrease year on year as overall resource consumption falls.



More policy development is required to ensure the proper separation of WEEE items so that the maximum amount is collected for both recycling and reuse. For example, in a recent study of the small appliances taken to a West London Household Reuse and Recycling Centre (HRRRC), the Restart Project and West London Waste Authority found that 36% of all small electricals headed for recycling were still in good working condition. We also need to see further work to incentivise better resource efficiency for WEEE of which reuse forms only a part.

19. Do you agree or disagree that we should introduce new targets for the re-use (or preparation for re-use) of WEEE that has been collected separately from other types of waste to incentivise more collections for re-use (or preparation for re-use)? Please select one of the following options:

Agree.

20. Please provide any evidence you have to support your answer to question 19.

We agree that new targets for the re-use of WEEE should be set to incentivise collection of WEEE for reuse. Utilising expertise from England's expansive network of community run repair cafes and reuse projects, the Government must mainstream the opportunity for consumers to engage in repair and reuse. This could be by funding the expansion of already existing repair and reuse networks (such as those detailed in the ReStart response to this call for evidence questions). Repair and reuse initiatives must be integrated into the financial decision making and operating models of large retailers in order to achieve any targets set. Retailers must also be responsible for promoting opportunities and initiatives for reuse and repair. This will empower individuals to mend and refurbish items rather than discarding them when they encounter issues. This will contribute to significant reduction in electronic waste, and alleviate the greenhouse gas production and raw materials required to manufacture new products.

21. If you answered agree to question 19, please provide evidence to indicate on which of the stakeholder groups below targets should be placed to maximise impact? Please select one of the following options:

Producers (via PCSs).

22. Please provide any evidence you have to support your answer to question 21.

PCSs and Local Authorities would be the best combination. PCSs mostly manage reuse targets in other countries. This is practical, but there should be flexibility and accountability for local authorities to ensure opportunities to reuse aren't missed, and to allow more ambitious areas to maximise reuse - and benefit from higher weighting above the reuse targets.



23. Do you agree or disagree that an obligation on PCSs to provide free collection services to reuse charities and the charity retail sector for donated equipment subsequently deemed unsuitable for re-use would promote greater re-use by removing a significant cost barrier to the sector? Please select one of the following options:

Agree.

24. Please provide any evidence you have to support your answer to question 23.

Repair and reuse charities operate on a shoestring budget. In a recent survey conducted for the Fixing Factory, we found that 56% of all participants were willing to spend £10-20 on a refurbished electrical product. With the time taken to transport and repair products diverted from landfill, plus costs of disposing of unrepairable products, it is hard to justify the time spent on bringing diverted electricals back into reuse.

25. Do you agree or disagree that access to data from retailers and Local Authorities on how much used equipment is received at these collection facilities for re-use (and consequentially diverted away from entering the WEEE producer responsibility system) would provide significant and useful new insight into volumes of equipment being re-used that is not classified as waste? Please select one of the following options:

Agree.

26. Please provide any evidence you may have to support your answer to question 25.

N/A.

27. Please provide evidence (including from international sources) of other potential mechanisms to increase levels of re-use and preparation for reuse activities across a broad range of products.

Wildlife and Countryside Link support the recommendations outlined by the ReStart project. This includes the policy recommendation to:

- **Make repair more affordable, through tax reductions and repair vouchers.** Repair Voucher schemes have been set up in Austria, France, and two German regions. Since initiation in April 2022, over 840,000 vouchers have been issued in the Austrian scheme, which effectively subsidises the cost of professional repairs by allowing families to obtain a rebate of 50% of the price of a repair, up to €200 per year. This was built on several regional trials. The Upper Austrian trial found that 40% of the beneficiaries wouldn't have chosen repair without the voucher scheme. Parliament's 2021 Environmental Audit Committee inquiry on electronic waste asked the UK



government to reduce VAT on the repair of electrical and electronic products. Back then the Government rejected the proposal. A recent [study by Green Alliance](#) showed 54% of people surveyed in the UK support green VAT measures like this. Only 12% oppose. And it could contribute to creating 34,000 jobs in the repair economy.

- **Expand the UK's right to repair regulations to cover all consumer products, strengthen design standards and remove barriers to repair for everyone.** The UK has existing eco-design legislation for many energy related products. These have mainly focused on energy in use, but the latest round of standards that included white goods and TVs, started to look at resource efficiency and repair for a limited set of products. They mandate that manufacturers must make service manuals and some spare parts for these products available to professional repairers for 7 to 10 years after retiring a product from the market. Now it's time to expand this "right to repair" legislation so that it's fit for purpose in our rapidly changing consumer goods economy.

Section 4: Moving to a circular economy through the design of better products and business models.

28. Do you agree or disagree that implementing a system of eco-modulation into the UK's WEEE system could incentivise more sustainable product design? Please select one of the following options:

Agree.

29. Please provide any evidence you have to support your answer to question 28.

We would support policy development into the implementation of a system of eco-modulation into the UK's WEEE system. We would point to the EU EEB Report which highlights some of the issues with eco-modulating with extensive, sometimes incompatible metrics e.g., what makes a product more durable might make it less repairable and vice versa. Any eco-modulation should be designed with this in mind to prevent elements of the system effectively cancelling each other out.

30. If you agree with question 28, which of the following approaches would you most likely support:

We support a new system of EPR in which variable fees, based on units placed on the market (POM), are modulated through the implementation of a malus (increased fee) or bonus (reduced fee). However, we would also expect to see policy development outside eco-modulation to financially incentivise producers to design products with minimal environmental harm, supply chain impact etc in mind.

31. Which of the following metrics should we use to prioritise products to eco-modulate?



Carbon intensity of the product.

We agree that the carbon intensity is the best metric to use to prioritise the eco-modulation of WEEE products. However, carbon intensity should just be the starting point for a metric. We would also want to see a metric including water usage, valuable chemicals, biodiversity loss and be distinguished by units of product categories.

32. Which of the following criteria should be used as an effective basis for eco-modulation - depends on the product, you might want to have different criteria for different things?

- a) Recycled content
- b) Recyclability
- c) Reparability
- d) Durability
- e) Energy efficiency
- f) Hazardous substances

33. Are there any other criteria, other than those set out in question 32, which you feel would be relevant? Please specify what these could be.

No. We support the use of the above criteria but suggest that energy efficiency and inclusion of hazardous substances should be legislated for separately. There should be separate energy efficiency targets for producers and/or distributors to meet outside of eco-modulation. Similarly, legislation is needed to prevent the inclusion of hazardous substances in WEEE products on the consumer market and in lieu of this legislation extremely high fees for those who continue to manufacture products with them in.

34. How should compliance with eco-modulation criteria be verified in a way that balances cost with the integrity of the system? Please select one of the following options

Self-declaration - with auditing.

35. Do you agree or disagree that eco-modulation should be supported by mandatory labelling to give consumers visibility of the extent to which the product has met certain eco-design criteria? Please select one of the following options:

Agree.

36. Please provide any evidence you have to support your answer to question 35.

We agree that mandatory labelling should support the roll out of an eco-modulated system. This could be similar to the existing eco rating we have for energy use on appliances now but



based on how sustainable each product is. Any sustainability measurement should be based on a standardised, mandatory methodology for calculating should avoid being overly complicated for the consumer. We would recommend a simple 1 to 5 rating. This would ensure consumers are able to make the most informed choice about the products they buy.

We also recommend introducing a repair index at the point of sale of new electrical products. This would help consumers identify how and where products can be repaired. We note that Defra already has the powers to introduce this through the Environment Act 2021. Similarly, we support Green Alliance's recommendation to establish digital product passports for specified products to ensure the UK does not fall behind the EU and prevents its citizens accessing similar repair and reuse opportunities.

If you answered 'agree' to question 35, in which format do you think this information should be displayed? Please select one of the following options:

We support the use of physical labelling and/or a QR code for further product details to ensure consumers are not digitally excluded.

37. Do you agree or disagree that products made available on the market using circular economy business models should be excluded from the calculation of collection and treatment obligations placed on producers because they will in any case be responsible for the individual product when it becomes waste? Please select one of the following options:

Disagree.

38. Please provide any evidence you have to support your answer to question 37.

We disagree but we think that they should have extremely favourable eco-modulation and payments for producers and/or distributors should be very low.

Section 5: Increasing the collection of business WEEE

39. Do you agree or disagree that the current business to business (B2B) system (EEE or WEEE that is designed for business, industry or professional use only, rather than household use) is an effective mechanism by which end users can return WEEE to producers for proper treatment? Please select one of the following options:

Agree.

40. Please any evidence you have to support your answer to question 39.

N/A.



41. Do you agree or disagree that we should extend the principle of producer responsibility to the premises of the business end user (and other non-household premises) and introduce a collective producer responsibility system for Business to Business (B2B) WEEE? Please select one of the following options:

Agree.

42. Please provide any evidence you have to support your answer to question 41.

We agree that producer responsibility for B2B WEEE should be established in a similar way to eEPR. We also encourage further policy development for circular opportunities for B2B waste.

43. Are there circumstances (for example, for certain product types) in which individual producers should be responsible for the cost of collection and treatment of the products they place on the market when they become waste? Please select one of the following options:

Yes.

44. If you answered yes to question 43, please set out what these product types might be.

All producers placing products with hazardous materials in them on the markets should be responsible for the cost of collection and treatment of the products they place on the market when they become waste. All modulated fees should take into account the additional costs involved with handling WEEE separately. A recent Eunomia report found that lithium-ion battery fires at waste management centres are costing the UK over £100 million per year. Similarly, new report produced jointly with the Environmental Services Association (ESA), entitled 'Cutting Lithium-ion Battery Fires in the Waste Industry', reveals that an estimated 201 waste fires caused by Li-ion batteries occur every year in the UK based on EA-reported figures, with damaging consequences for both the environment and society.

45. Do you agree that a system in which producers financed the cost of collection from the business end user and adequately supported by appropriate communications would be sufficient to drive increased levels of business WEEE into the system? Please select one of the following options:

Agree.

46. Please provide any evidence you have to support your answer to question 45.

We would also like to see the implementation of targets for B2B WEEE.



47. Are there any circumstances in which it might not be appropriate for producers to finance collections from businesses? Please select one of the following options:

No.

48. If you answered yes to question 47, please say circumstances these may be. Please provide any evidence you have to support your answer.

N/A.

49. Do you agree or disagree that there should be a ban on producers and distributors sending whole items of electrical equipment (such as surplus stock) to landfill or incineration? Please select one of the following options:

Agree.

50. Please provide any evidence you have to support your answer to question 49.

We would like to see a ban on producers and distributors sending whole items of electrical equipment to landfill and incineration immediately. Any ban should prevent producers and distributors from passing on the burden of disposal to local authorities, charities and/or exported abroad causing further pollution of non-OECD countries. Currently, a ban is being considered in the EU and further information can be found in [this briefing](#) by the European Environment Bureau.

51. If a ban were to be implemented, do you foresee any unintended consequences of unwanted electrical stock being redirected to any of the following routes? Please select one of the following options:

- a) Reselling
- b) Repair / refurbishment.
- c) Re-use
- d) Recycling

52. Please provide any evidence you have to support your answer to question.

N/A.

53. What are your views on alternative policies to improve the B2B system? Please provide any evidence you have to support your answer.

We support targets for B2B WEEE collection and agree that any alternative policy are not prohibitively expensive for the consumer.



Section 6: Improving treatment standards.

54. Do you agree or disagree that the recovery and recycling rates for WEEE should be reviewed to ensure that those targets remain sufficiently challenging whilst achievable? Please select one of the following options:
- a) Agree
 - b) Disagree
 - c) Unsure
55. Please provide details of evidence sources used to support your answer and evidence on the extent current targets are being met and exceeded.
56. Do you agree or disagree that AATFs should be required to report annually on the extent to which they have met those recycling and recovery targets and that their report should be supported by an independent audit? Please select one of the following options:
- a) Agree
 - b) Disagree
 - c) Unsure
57. Please provide any evidence you have to support your answer to question 56.
58. Please provide evidence of likely costs of both reporting and independently auditing recycling and recovery rates.
59. Do you agree or disagree that the introduction of individual recovery targets for specific materials, including critical minerals would drive recovery of and demand for those materials thereby contributing to Net Zero and Circular Economy ambitions whilst supporting security of supply of certain materials? Please select one of the following options:
- a) Agree
 - b) Disagree
 - c) Unsure
60. Please provide any evidence you have to support your answer to question 59.
61. If you agree with question 60, would you support the introduction of reporting on specified materials to form a useful evidence base ahead of setting targets in the future? Please select one of the following options:
- a) Agree
 - b) Disagree
 - c) Unsure



62. If you answered yes to question 61, should these targets be mandatory or nonbinding?
- a) Mandatory
 - b) Non-binding
63. We require treatment facilities to demonstrate sound management of WEEE, including removal of specified hazardous material and POPs. Are there any other substances and components which should be added to the restricted list? Please provide evidence to support your answer.
64. What do you think are the key barriers to improving material recovery when treating WEEE? Please select one of the following options:
- a) Information barrier
 - b) Technological barrier
 - c) Other - infrastructure, investment, commercial, supply chain.
65. If you answered 'other' to question 64, please specify what this would be.
66. What information do you think suppliers of products should be required to provide to assist waste treatment operators to increase the recovery of specific materials or components commonly found in WEEE?

We support producers and/or distributors having to complete a declaration of hazardous substance/critical minerals used within their products. This would form part of a product passport.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 83 organisations to use their joint voice for the protection of the natural world and animals. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

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The following organisations have inputted into this response:

