



Department
for Business
Innovation & Skills

**IMPLEMENTATION OF THE WEEE
RECAST DIRECTIVE 2012/19/EU
AND CHANGES TO THE UK WASTE
ELECTRICAL AND ELECTRONIC
EQUIPMENT (WEEE) SYSTEM**

Summary of Responses to
Consultation

AUGUST 2013



Department of the
Environment
www.doeni.gov.uk



**The Scottish
Government**



Llywodraeth Cymru
Welsh Government

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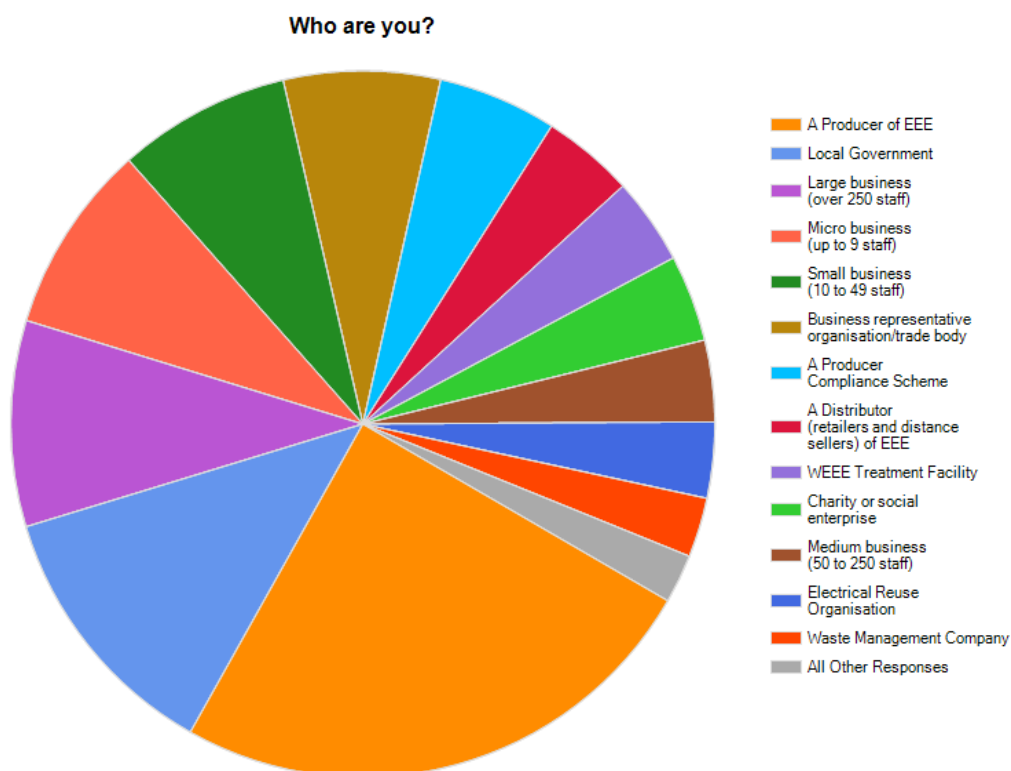
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Implementation of the WEEE Recast Directive 2012/19/EU and Changes to the UK Waste Electrical and Electronic Equipment (WEEE) System

1. Introduction

1. The purpose of this document is to summarise the responses we received to the WEEE consultation. We aim to publish the full Government response in September 2013. This will set out how the Government intends to take forward each of the issues on which views have been sought. It will be accompanied by final impact assessments and revised regulations. You will have an opportunity to comments on these revised regulations.
2. We received 256 responses to the consultation. A full list of respondees is attached at Annex A. The largest response came from producers of EEE (Electrical and Electronic Equipment) with 100 respondents identifying themselves as producers. This was followed by local government with 49 responses. 29 trade bodies also responded along with 22 Producer Compliance Schemes (PCS), 17 distributors of EEE, 16 WEEE treatment facilities, 16 charities or social enterprises, 14 electrical reuse organisations and 11 waste management companies (WMCs). The remainder of responses came from individuals, central government and staff associations. The pie chart shows a breakdown by stakeholder group. It should be noted that some respondents selected more than one category. For example a producer may have also identified themselves as a large business.



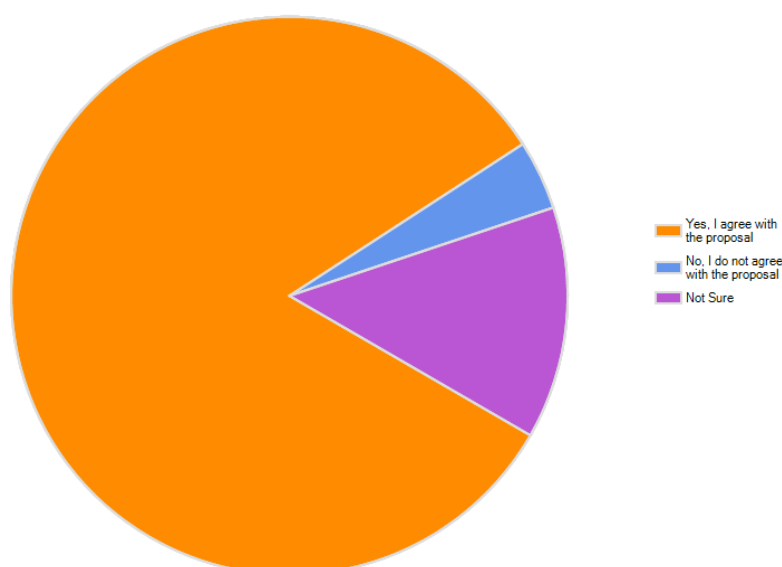
2. Summary of Responses

This section contains a summary of the responses to each question.

Question 1 - Do you agree with the Government's proposed approach on Photo Voltaic (PV) panels?

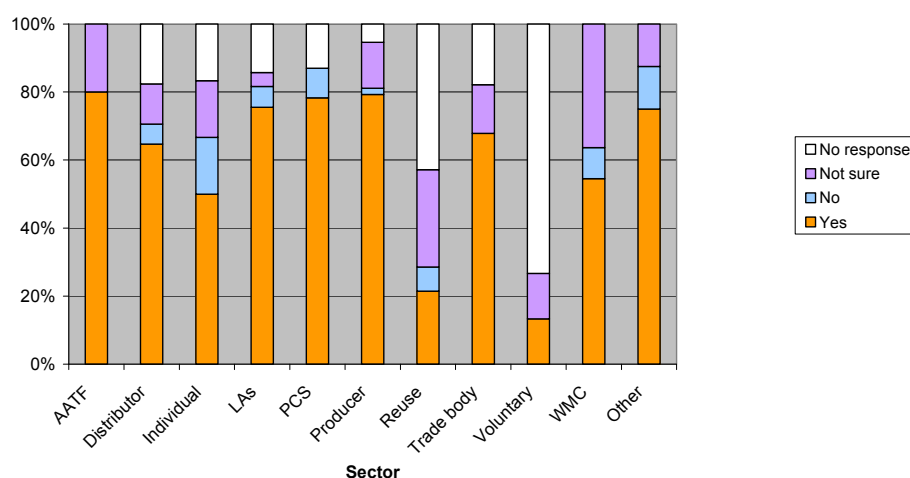
3. We received 223 responses to this question. 184 respondents (83%) supported the proposal, 9 respondents (4%) did not support the proposal and 30 respondents (13%) were not sure. Overall, there was a large amount of support across all stakeholder groups for the proposal.

Do you agree with the Government's proposed approach on Photo Voltaic (PV) panels?



4. Producers were largely in favour of the proposal. They thought that incorporating PV panels in to category 4 would artificially distort producers' financial obligations as PV panels are not likely to appear in the waste stream for another generation. Many also pointed out that there is already a growing network of collection facilities for PV panels across the UK that would treat them at the end of life.

Question 1 - Do you agree with the Government's proposed approach on Photo Voltaic (PV) panels? Shown by stakeholder group.

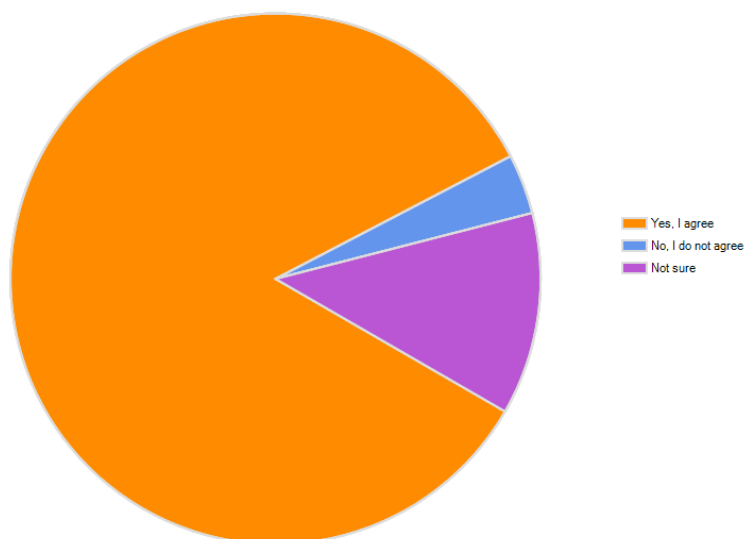


5. Local authorities across England, Scotland and Wales were also largely in favour of the proposal but many requested guidance on the action to take should PV panels be deposited at a Designated Collection Facility (DCF). However, local authorities in Northern Ireland made the point that PV panels would be more likely to be taken to a DCF there than in the rest of the UK and did not support the proposal.
6. Stakeholders that selected 'not sure' tended to be in different sectors to those affected by the proposals and felt that they could not comment. A small number of stakeholders were against the proposals and felt that PV panel manufacturers should pay into a fund now for their future treatment as an alternative method of addressing the problem.

Question 2 – Do you agree that the current reporting Category 13 should be expanded to include light emitting diode (LED) lamps?

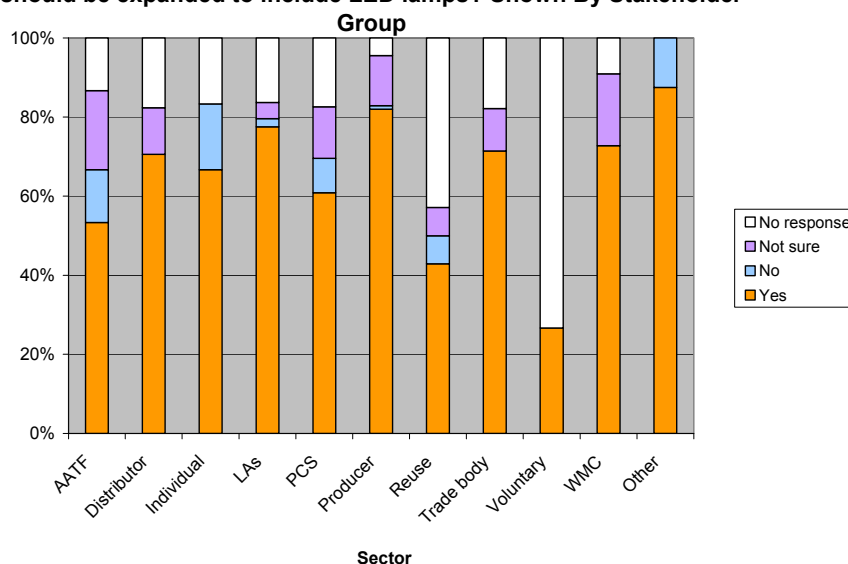
7. We received 219 responses to this question. 184 respondents (84%) supported the proposal to expand category 13 to include LED lamps, 8 respondents (4%) did not support the proposal and 27 respondents (12%) were not sure.

Do you agree that the current reporting Category 13 should be expanded to include LED lamps?



8. There was a high level of support for this proposal across all stakeholder groups. This included very strong support from lighting industry trade bodies and lamp producers. However, there was some concern amongst new market entrants that produce LED lamps and have never placed gas discharge lamps (GDLs) on the market that their compliance costs would increase, given that GDLs are considerably more expensive to recycle than LED lamps and these lamps will not become waste to any significant degree for a number of years.

Question 2 - Do you agree that the current reporting Category 13 should be expanded to include LED lamps? Shown By Stakeholder



9. The view amongst lamp treatment facilities was mixed. Some facilities expressed concern that non hazardous (LED lamps) and hazardous lamps (gas discharge lamps (GDLs)) would be mixed at collection sites and treatment processes for the two different types of lamp may not be compatible with each other. Others expressed support to ensure that GDLs did not become an "orphan" waste stream, with no producers to finance their treatment in future years.

Questions 3 and 4 - Unobligated WEEE and Substantiated Estimates

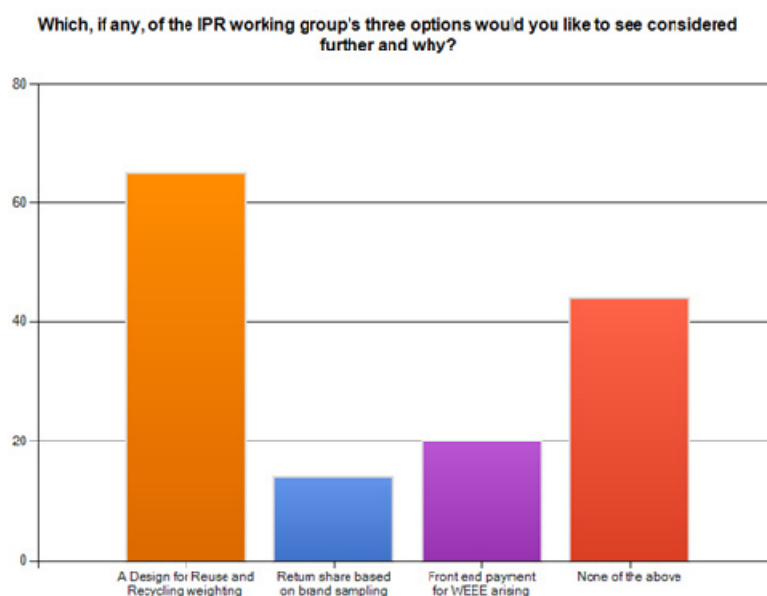
10. Question 3 asked: **Do you have any comments on the proposed approach of developing a protocol to estimate the tonnage of Large Domestic Appliances (LDA) and Small Domestic Appliances (SDA) collected and treated outside the WEEE system established by the regulations?**
11. We received 218 responses to this question.
12. Question 4 asked: **What other measures might the Government take to establish "substantiated estimates" of WEEE collected and properly treated or sent for re-use via other routes - in particular B2B WEEE - in order to meet the new collection targets coming in to force in 2016?**
13. We received 213 responses to this question.
14. There was broad support across key stakeholder groups for the development of substantiated estimates of Large Domestic Appliances (LDA) found in the light iron waste stream at Approved Authorised Treatment Facilities (AATFs). Some concern was expressed that developing such a protocol could detract from physical collections due to reductions in available funding for those collections, or that it might encourage more WEEE to be treated outside the producer financed system. It was also thought necessary to ensure any application of a protocol did not have a disproportionate effect on any collection targets placed on other WEEE streams if option 3 was pursued.
15. There was broad agreement amongst those supporting the proposal that any such approach should be subject to regular review, should not result in any reduction in treatment standards and measures should be taken to avoid "double counting" of data. Some argued that the research in developing such estimates should be based only on tonnages being handled by AATFs (rather than Authorised Treatment Facilities (ATFs)). It was argued that whilst ATFs were required to meet treatment standards they were not required to achieve recovery targets laid down in the Directive.
16. Mixed views were expressed regarding the extension of any protocol to Small Domestic Appliances (SDA). Some, particularly producers, supported the extension into other non-hazardous categories. A number of PCSs, treatment facilities and waste management companies cautioned against such an approach. Some argued that metal shredders handling Small Mixed WEEE (SMW) were not able to meet treatment or recovery targets and so it could not count towards member state collection targets. It was better to increase efforts to prevent SDA being mixed with LDA or light iron at collection points.
17. Suggestions of other areas that could be examined included:
 - Tonnages of EEE placed on the UK market but subsequently exported and therefore never likely to arise in the UK waste stream;
 - Tonnages of B2B equipment handled by asset management companies and subsequently re-sold;

- Tonnages of equipment entering the re-use market (but not currently being counted);
- Tonnages of “metal rich” B2B equipment being disposed of as light iron; and
- Tonnages of B2B equipment being refurbished and reused.

Questions 5 and 6 – Individual Producer Responsibility (IPR)

18. The IPR question was asked in two parts. Question 5 asked: **Which, if any, of the IPR working group’s three options would you like to see considered further and why?**

19. We received 208 responses to this question. 125 of these selected at least one of the options. The remainder of respondents provided comments without selecting an option. 65 respondents (52%) would like to see ‘A Design for Reuse and Recycling Weighting’ taken forward, 14 respondents (11%) would like to see ‘Return Share Based on Brand Sampling’ taken forward, 20 respondents (16%) would like to see ‘Front End Payment’ for WEEE Arising taken forward and 44 respondents (35%) would like to see none of the options taken forward. Overall, A Design for Reuse and Recycling Weighting was the most popular option although the view across stakeholder groups was mixed with very differing opinions expressed.



20. Question 6 asked: **What are the economic and environmental costs and benefits of the IPR working group’s three options for developing financial IPR?**

21. We received 200 comments to this question.

A Design for Reuse and Recycling Weighting

22. This was the most popular option and there was support for this option across all stakeholder groups. This option was favoured by local authorities, with most seeing it as an effective way of moving waste up the waste hierarchy. There was support from producers for this option, although some questioned how key differentials between products would be identified. They also questioned the cost of assessing products and setting appropriate fees. Charities were also broadly supportive and some wanted a target for reuse introduced as part of this option.

Return Share Based on Brand Sampling

23. There was very little support across most stakeholder groups for this option compared to the first option. Local authorities were generally opposed as they felt implementation would require separation of individual brands at DCFs, which they thought would be unfeasible. A small number of larger producers showed support for this option as they felt it provided the greatest incentive of the three options to improve eco design and they also felt it could be implemented relatively quickly.

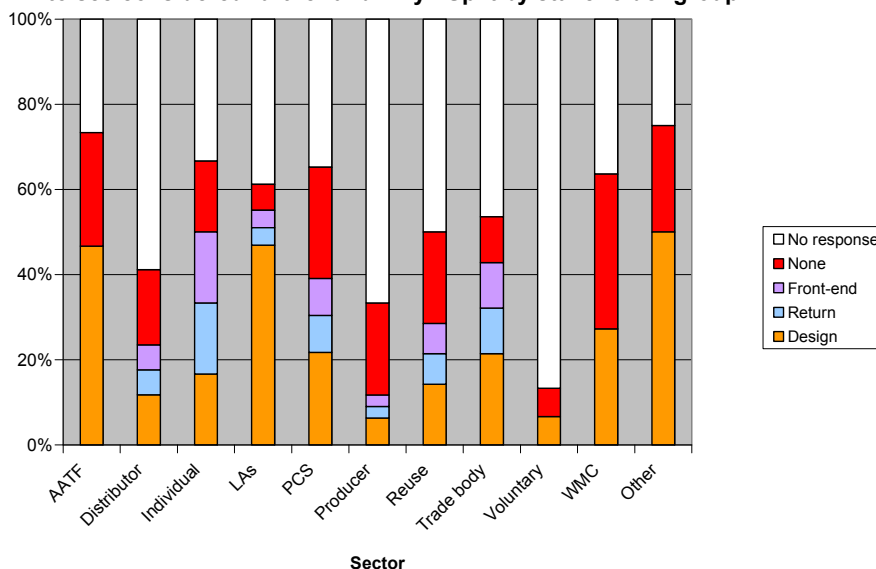
Front End Payment for WEEE Arising

24. Many local authorities and some other stakeholders felt that this proposal would decouple the cost of WEEE arising from the amount of funding available, with the potential for there to be WEEE arising with no funding available to treat it. Others did not see this as a problem and assumed all treatment costs would be covered by the front end payment.

None of the above

25. Some stakeholders, including PCSs, acknowledged that there is nothing in the existing regulations or the new draft that prevents producers from setting up their own PCS and collecting their own WEEE to meet their obligations as a form of IPR. Some trade bodies and producers felt the regulations were obstructive to implementing IPR, but did not explain why.
26. Smaller producers felt that any type of IPR would only benefit larger producers and tended to prefer the current system of collective responsibility.

Which, if any, of the IPR working group's three options would you like to see considered further and why? Split by stakeholder group.



Other comments

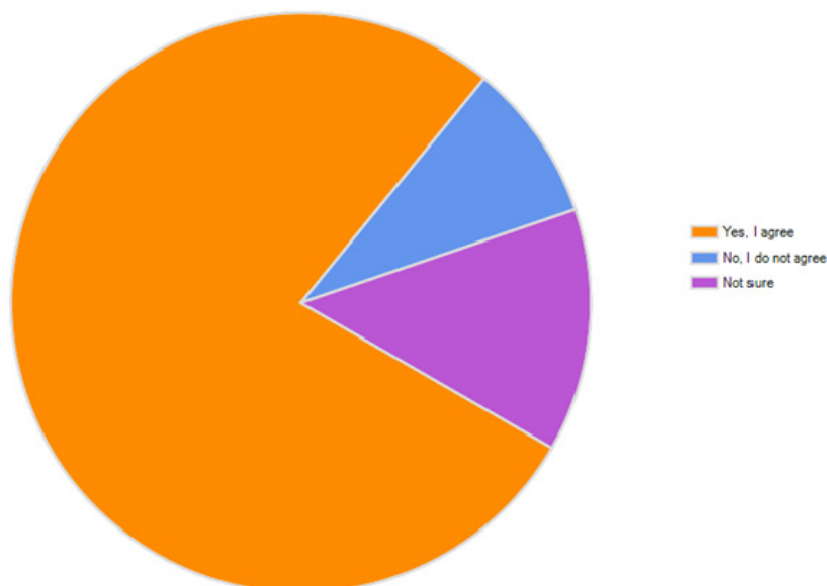
27. Many felt that a decision on IPR could not be reached until it was clear which, if any, of the proposals for the WEEE system changes would be taken forward. Many producers and some local authorities felt that option 4 of the WEEE system changes (DCF PCS matching) would be the best option for subsequently introducing any IPR system.
28. Some distributors, who are also classed as producers due to importing EEE, along with some other stakeholders, felt that all options should be considered and it should be up to the organisation in question to select a model that best fitted their business model. They also felt they had little influence over the original manufacturers of EEE they imported to change the design of products to be more environmentally sound.

QUESTIONS ON OPTION 3 – TARGET AND COMPLIANCE FEE

Question 7 - Do you agree that, if this option were to be adopted, the Regulations should enable the establishment of a compliance fee by producers, approved by Government subject to due consultations?

29. We received 214 responses to this question. 166 respondents (78%) were supportive of a compliance fee, 19 respondents (9%) were not supportive and 29 respondents (13%) were not sure. The majority of substantive comments came from producers, local authorities, PCSs and WEEE treatment facilities.

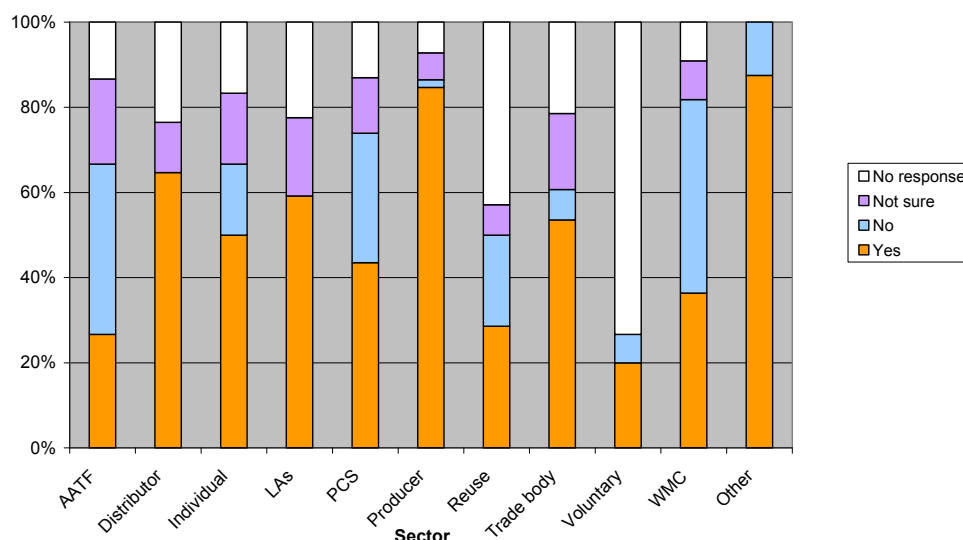
Do you agree that, if this option were to be adopted, the Regulations should enable the establishment of a compliance fee by producers, approved by Government subject to due consultations?



30. There was a high level of agreement across all stakeholder groups that setting the fee at the right level would be critical to its success. Set too low and it would disincentivise physical collection by PCSs, acting as a low cost form of compliance as well as jeopardising the achievement of the member state collection target. Set too high and it could lead to market distortions. There was widespread concern that it should not

jeopardise the viability of collections undertaken by PCSs outside the local authority DCF infrastructure.

Question 7 - Do you agree that the Regulations should enable the establishment of a compliance fee? Shown by stakeholder group



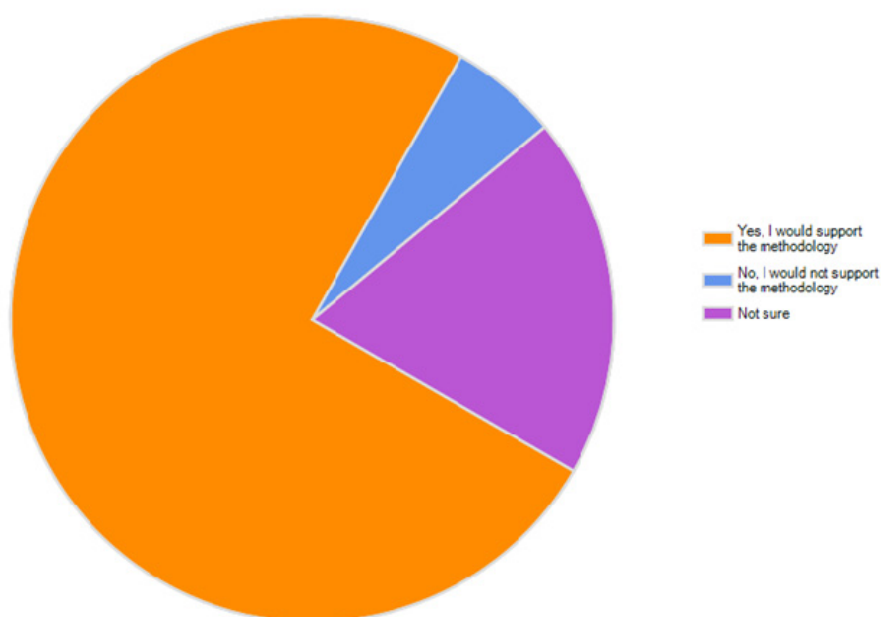
31. There was strong support amongst producers in particular, although they expressed a view that the methodology for calculation should be transparent, applied individually to collection streams, incentivise physical collections, provide confidentiality to those that access the fee, subject to change from one year to the next without recourse to amending regulations and not be announced until towards the end of the compliance year.
32. Whilst supported by the majority of distributors, others including a distributor representative body, whilst seeing merit in the fee, were unconvinced of its application and expressed concern about the ability to reach a consensus on the methodology amongst stakeholders.
33. Local authorities and their representative bodies were generally supportive of the proposal, in particular that funds raised should be used to support the local authority collections. They reiterated the need for safeguards to ensure the collection of WEEE arising at DCFs even if collection targets were reached or the option of a compliance fee existed. One respondent expressed concern that its existence might result in fewer PCS bidders for regional DCF contracts.
34. Views amongst PCSs were mixed. 53% who responded supported the principle but those in favour of maintaining Option 1 were generally unsupportive of the compliance fee. Some suggested setting the fee at the start of the compliance year would minimise market distortions in contracting between schemes, with others believing any market distortions would be minimised if it was set at the end of the year. One suggestion provided for PCSs with household WEEE obligations to meet their targets via collection of business WEEE and allowing carryover/anticipation of WEEE in excess/deficit of targets to the following compliance year to reduce any need for a compliance fee. Another suggestion was that the fee should only be used if all WEEE collected had been financed and targets still not achieved.

35. Views amongst AATFs and waste management companies were also mixed with 50% of those responding opposing the proposal in both stakeholder groups. A key concern was that it could result in reduced collections, particularly those outside the local authority DCF network which were cited as more costly than DCF collections.
36. Some ideas were put forward for a methodology, or key components for an agreed methodology. These included:
- a ratchet mechanism that introduced escalating costs the greater a PCS was reliant on the compliance fee,
 - a PCS should be prohibited from solely relying on the compliance fee in order to meet obligations,
 - the fee should not be based solely on DCF collection costs,
 - the fee should only be used exceptionally post compliance year and based on individual PCS “avoided costs”.
37. Producers also put forward an alternative proposal that enabled a PCS with surplus WEEE to offer that surplus to a Producer Balancing System which would then match that excess to a PCS or PCSs in deficit using an algorithm that ensured appropriate redistribution of DCF sites. The mechanism would prevent a scheme in surplus from only offering the most expensive collection sites to the system for redistribution, with a fee only payable if there was insufficient WEEE in the system for all PCSs to meet their targets.

Question 8 - If this option were to be adopted, would you support the methodology for calculating collection targets placed on producers of household EEE via their producer compliance scheme?

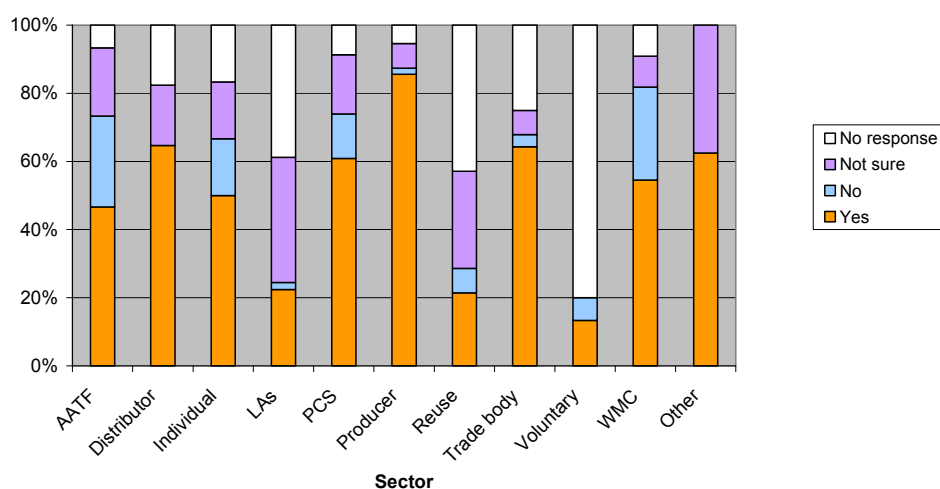
38. We received 207 responses to this question. 155 respondents (75%) were supportive of the methodology, 12 respondents (6%) were not supportive and 40 respondents (19%) were not sure.

If this option were to be adopted, would you support the methodology for calculating collection targets placed on producers of household EEE via their producer compliance scheme?



39. The majority of substantive comments came from producers, schemes and treatment facilities. A range of stakeholders including producers, retailers and those representing treatment operators noted that, when calculating substantiated estimates as part of the target setting methodology, exports of EEE should be deducted. Retailers also noted imports of EEE for hire would often not arise in UK as waste.

Question 8 - If this option were to be adopted, would you support the methodology for calculating collection targets placed on producers of household EEE via their producer compliance scheme?
Shown by stakeholder group.



40. Local authorities largely felt this was a matter on which they were unqualified to comment. However, those that did comment generally stressed the importance of accurate data and the need to avoid “double-counting” of data – particularly in the use of “substantiated estimates”. Other comments were generally supportive but stressed

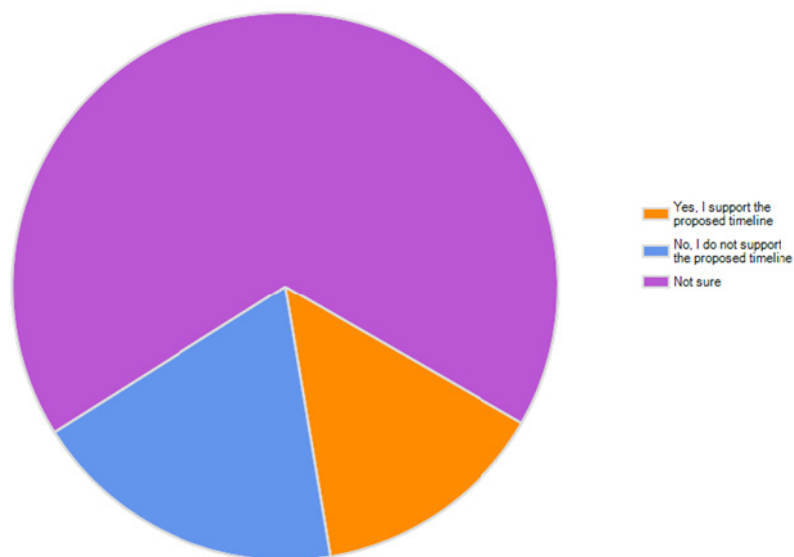
the need for collections from local authority sites to continue even if targets had been achieved and more was needed to support resource efficiency. Local authority waste management partners that commented were concerned that WEEE counted outside the system must be treated to necessary standards and that the target must encourage innovative collection routes.

41. Over 50% of treatment facilities supported the proposal but felt only LDA (and possibly B2B WEEE arising in the light iron stream) should be used in the “substantiated estimates” calculation. Those objecting to the proposal who commented expressed concern about negative environmental impacts arising from using “substantiated estimates” of WEEE arising outside the WEEE system before placing targets on schemes. Representatives of third sector re-use organisations pressed for a separate reuse target to be placed on schemes.
42. Strong support was received from producers and producer owned schemes for the proposed methodology and for the use of substantiated estimates for WEEE collected and properly treated outside the system. A suggestion that if thresholds for in-year reviews of targets (in case of significant changes to PCS membership) are used, a separate threshold might be applicable for lamp producers. Any large members that cease trading after registration but before start of compliance year should also trigger a review of a PCS’s target. Producers noted the target could be high in any category in which collections outside system were low. Producers pressed for a stakeholder group to advise on setting the target annually.
43. There was support for the target methodology by retailers who noted the importance of the need to take account of prevailing market conditions and that EEE placed on the market in the UK will not necessarily arise as WEEE in the UK.
44. There was also strong support amongst PCSs, with 70% of PCS respondents in favour of the methodology. Views of producer led schemes are noted above. Amongst other comments, one scheme suggested the approach could take account of average costs of treatment in each stream to bring greater flexibility in achieving tonnage target. Whilst another suggested using in-year B2C WEEE data. Others suggestions included allowing schemes to collect B2B WEEE in order to assist with achieving the target, and needing to take market conditions into account as well as historical data. Some suggested that instability will result from treatment operators becoming more reliant on PCSs for access to WEEE. Some concern was expressed that WEEE collections by PCSs may decline if PCS targets are achieved mid year.

**Question 9 - If this option were to be adopted, would you support the proposed time-line for implementation for each compliance period?
Comment particularly on scope to reduce or remove any of these steps.**

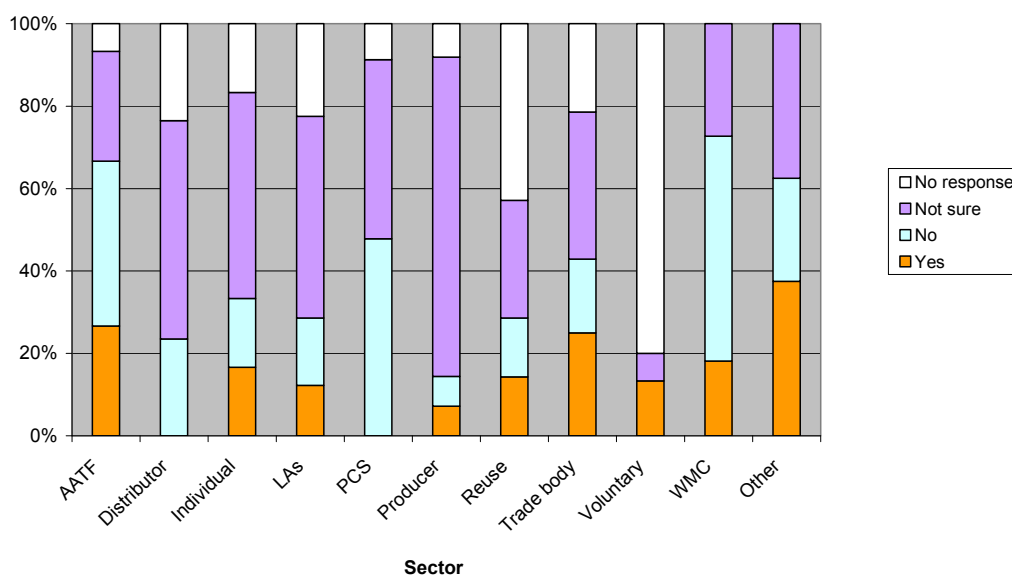
45. We received 214 responses to this question. 30 respondents (14%) supported the proposed timeline, 40 respondents (19%) did not support the timeline and 144 respondents (67%) were not sure. Overall, there was a large amount of uncertainty across all stakeholder groups around the timeline.

If this option were to be adopted, would you support the proposed time-line for implementation for each compliance period? Comment particularly on scope to reduce or remove any of these steps.



46. The majority of comments came from producers, their representative organisations local authorities and PCSs.

Question 9 - Would you support the proposed time-line for implementation for each compliance period? Shown by stakeholder group.



47. Producers' main concern was that sufficient time be provided to establish the Producer Balancing Scheme during the first half of 2014.

48. A number of local authorities and PCSs were concerned about the lead time for putting in place or reviewing PCS/DCF contracts ahead of the regulations coming into force on 1 January 2014 and the time needed to establish the targets placed on schemes and the compliance fee mechanism. In addition local authorities expressed concern at the

lack of time to decide whether to opt out of value streams for the 2014 Compliance Year.

Question 10 - To what extent does this option help contribute to meeting the increasingly challenging collection targets in the WEEE Directive and the priority the new Directive attaches to the separate collection and treatment of hazardous waste?

49. We received 212 responses to this question.

50. The general view amongst local authorities was that this option could help to meet collection targets, particularly if funds from the compliance fee were made available to DCFs to support higher collection levels. It was essential for local authorities that in setting targets no DCF operator was left with uncollected WEEE, even if collection targets had been met. This option, nor any of the others, provide a direct incentive for DCF operators to collect more or for householders to recycle more WEEE. Some DCF operators felt Option 3 supported long term relationships between DCFs and PCSs that would likely result in partnership initiatives to drive up collection rates. Others were concerned that more innovative forms of collections by PCSs might cease as a result of implementing option 3.

51. This view was supported by some AAFs. Some AAFs commented that correct application of targets, split by stream, would bring flexibility that would help towards achieving the Member State target and that hazardous streams could be prioritised through the target setting process. They recognised the potential benefits of long term PCS/DCF relationships in increasing collections. Other AAFs expressed concern that the target would set a maximum tonnage for WEEE collections so that sites might be left uncleared after a PCS had achieved its target. They also felt that hazardous waste would not be prioritised and recommended that all hazardous WEEE arising in the UK must be financed by producers. The re-use charity sector also expressed some concern about the support from PCSs under this approach whilst others predicted improvements in how WEEE was managed and treated (including re-use).

52. There was a strong view amongst producers that if this option was adopted it would contribute towards achieving the Member State target, as well as being the only option that presented a stimulus for increased collection (the others being structured to deal with whatever WEEE arises). They also felt establishing estimates of WEEE, properly treated, outside the system financed by producers would be also be important in contributing to meeting the Member State target.

53. Comments amongst PCS were mixed. Some considered the approach was the only option proposed that placed a specific responsibility on industry to collect an amount necessary to help achieve the member state target. They argued that it would increase competition between PCSs and encourage long term partnerships between PCSs and collectors leading to investment intended to drive up collections. Others argued that the approach would put a cap on collections, not stimulate collection of hazardous WEEE or innovative collection routes and generally drive down collection rates and treatment standards. Some held the view this would be exacerbated if proposals to use substantiated estimates of WEEE treated outside the producer financed system were used in calculating total WEEE collections.

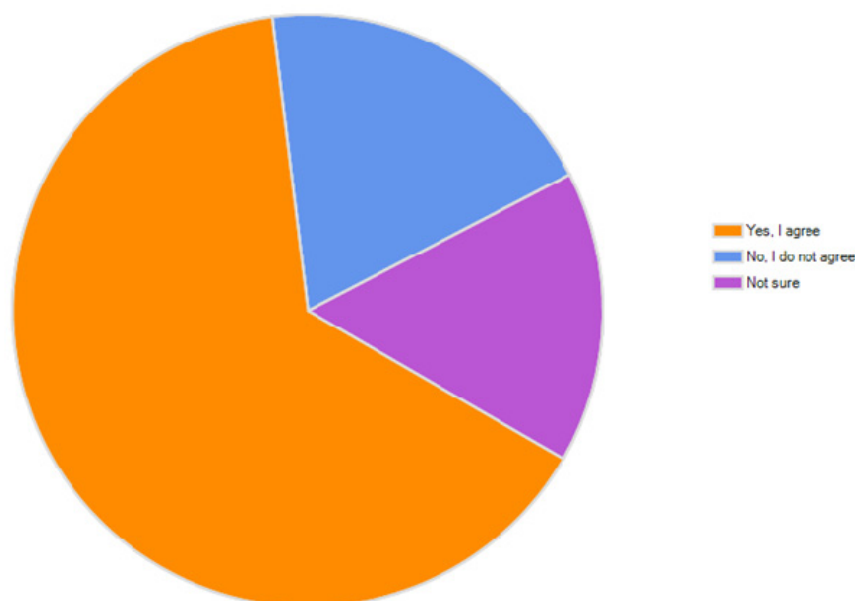
54. A number of respondents suggested PCS targets be set to achieve “interim” UK targets ahead of the 45% target in 2016 and 65% target in 2018.
55. Many, including the waste management sector, saw the success of the target based approach being strongly linked to the methodology for calculating the compliance fee.

QUESTIONS ON OPTION 4 – DCF/PCS MATCHING PROCESS

Question 11 - If this option were to be adopted, would you agree that the matching process should be developed using an algorithm based on matching tonnage obligations by collection stream, rather than a matching of tonnage equivalent to estimated costs for discharging obligations or an auction of collection?

56. We received 207 responses to this question. 134 respondents (65%) supported the proposal of an algorithm based on tonnage, 40 respondents (19%) did not support the proposal and 33 respondents (16%) were not sure. Many of the respondents who said they did not agree with the development of an algorithm were also against the implementation of option 4.

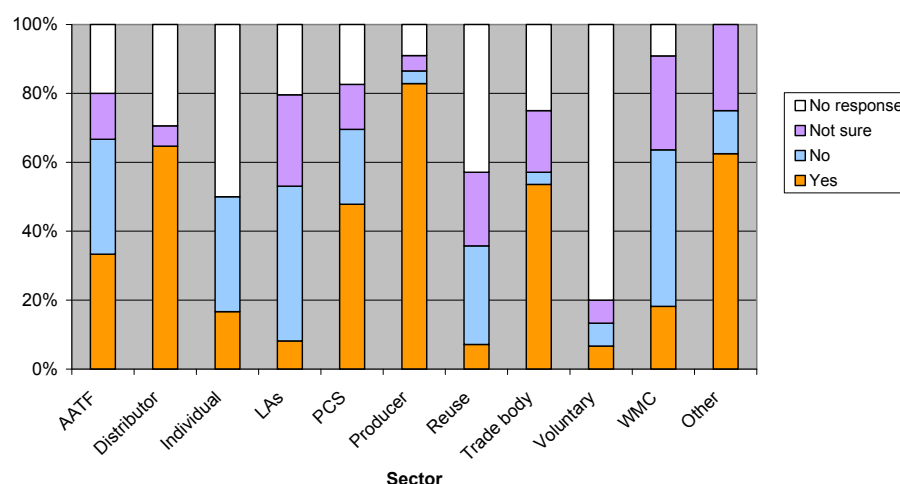
If this option were to be adopted, would you agree that the matching process should be developed using an algorithm based on matching tonnage obligations by collection stream, rather than a matching of tonnage equivalent to estimated costs for discharging obligations or an auction of collection?



57. Comments came back from all stakeholder groups suggesting that developing an algorithm using the cost of treatment would be too complicated to calculate accurately.

For the suggestion of auctioning DCF sites, there was concern, especially from local authorities, that remote DCF sites would be unpopular and risk not being cleared.

Question 11 - If this option were adopted, would you agree that the matching process should be developed using an algorithm based on matching tonnage obligations by collection stream, rather than a matching of tonnage equivalent to estimated costs for discharging obligations or an auction of collection? Shown by stakeholder group



58. The view across stakeholder groups for this question was mixed. There was support from some of the major stakeholder groups, including producers and schemes, for the development of an algorithm using tonnage. Many responses cited the successful implementation of such a system in other member states. There was virtually no support from any group for the suggestion of using treatment costs as a basis for developing an algorithm, or for the development of an auction system for DCF site allocation.

59. Although local authorities generally did not agree with option 4, along with many waste management companies, some supported the use of an algorithm to allocate sites if this option was chosen, but most were against option 4 and consequently felt they could not support the algorithm. Local authorities that objected raised the following concerns about the process:

- How would remote sites be dealt with where access could be more costly than sites that were easier to access?
- Would a 'reset' button be pressed each year, meaning a new PCS or multiple new PCSs being allocated each year. Local authorities felt this would in turn affect the ability to build constructive relationships and they also believed it would disincentivise investment in DCFs.
- What would happen to long term contracts that were already agreed? Would they have to be terminated? Or would they be exempt from the matching process until the contract expired?
- How would the competence of a PCS be assessed? And what would happen if a PCS was not up to standard?

60. If option 4 was chosen, local authorities made clear that, as a key stakeholder in this process, they would want to be closely involved in how the algorithm worked.

Question 12 - If this option were to be adopted, how should new producers and new DCFs registering mid year be incorporated into the system?

61. We received 203 responses to this question. There were a number of different suggestions as to how new DCFs and producers should be incorporated in to the system. These suggestions included:

- If the algorithm allocates one PCS per local authority then any new DCF automatically goes to that PCS;
- As obligation is calculated on previous year's data, new producers pay a fixed fee in their first year and then for following years they pay in line with their obligation for the previous year, effectively banking data until the next year;
- New DCFs should be matched to PCSs whose collections are lowest compared to their obligation;
- New producers should automatically be allocated to over collecting schemes; and
- There was a suggestion that there should be no in-year registrants for either DCFs or producers and they both should wait until the start of a compliance year to register.

62. One major trade association felt that, compared to overall amounts nationally, the numbers of new producers and the creation and removal of DCFs is relatively minor and any changes should be easily accommodated.

63. Local authorities wanted a mechanism for closing as well as opening DCFs to be built in to the system too without any penalty being incurred. Local authorities also had a concern that they would be left with excess WEEE to manage at a new DCF and no collection arrangements in place.

64. Local authorities also made clear that they would not want frequently changing PCSs and that they would prefer one over collecting PCS for all sites rather than an individual PCS allocated to one site, or even one WEEE stream on one site.

Question 13 - To what extent would this option help contribute to meeting the increasingly challenging collection targets in the WEEE Directive and the priority the new Directive attaches to the separate collection and treatment of hazardous waste?

65. We received 207 responses to this question.

66. Many local authorities, some PCSs and other stakeholders felt that option 4 would not promote long term relationships between PCSs and DCFs and so PCSs would be

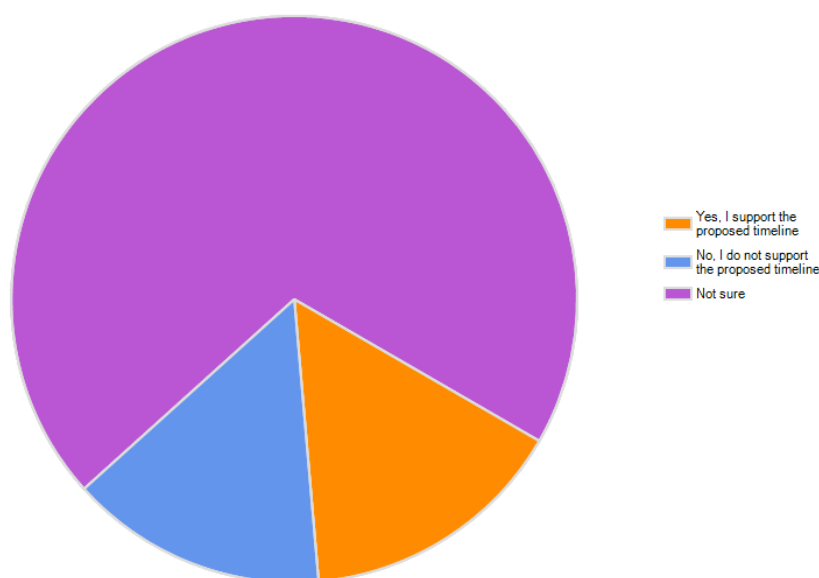
unwilling to provide investment in DCFs that they might lose at the end of a compliance year when the algorithm reallocates DCFs. These stakeholders generally thought this potential loss of investment would adversely affect the achievement of the targets.

67. Some local authorities felt that option 3 would contribute more to meeting the targets than option 4, because the element of competition between schemes and the possibility of longer term contracts to gain access to DCFs would drive up collection and incentivise schemes to invest in DCFs.
68. There was also concern from local authorities, waste management companies and an industry body that there was no mechanism in this option to prioritise the collection and treatment of hazardous WEEE.
69. Some WMCs and local authorities also felt that the fragmentation of existing PCS collection networks caused by the algorithm would be detrimental to the achievement of the targets by reducing a PCS's economies of scale.
70. Many producers and some schemes suggested that PCSs should establish a fund paid for by producers for awareness and infrastructure to drive up collection of WEEE.

Question 14 - If this option were to be adopted, would you support the proposed time-line for implementation for each compliance period? Comment particularly on scope to reduce or remove any of these steps.

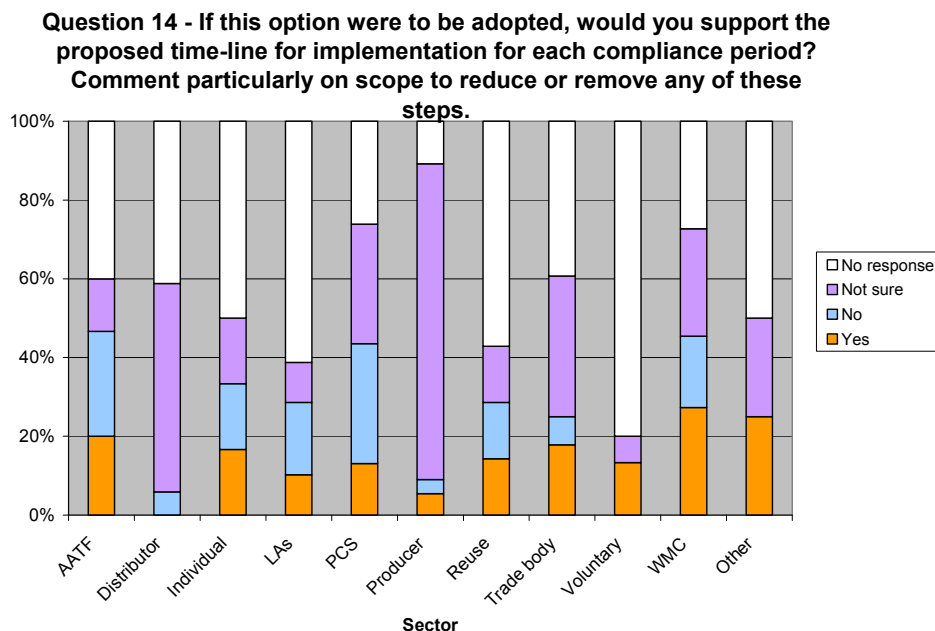
71. We received 170 responses to this question. 26 respondents (15%) supported the proposed timeline, 25 (15%) did not support the proposed timelines and 119 (70%) were not sure.

If this option were to be adopted, would you support the proposed time-line for implementation for each compliance period? Comment particularly on scope to reduce or remove any of these steps.



72. There were mixed views from stakeholder groups with much uncertainty in the feasibility of the timeline, as shown by 70% of respondents selecting "not sure". Some

responses suggested bringing the proposed implementation forward to July 2014, whereas other responses suggested that January 2015 was too ambitious and it would not be possible to implement the proposals in that timescale.



73. Local authorities highlighted that the reporting periods in the proposed timeline do not match with existing WasteDataFlow reporting obligations and deadlines for data submission would be missed.

74. Other concerns raised included that the allocation of collections would be based on 18 month old data and this may lead to problems with the accuracy of allocations, there was no contingency built in to the timeline to allow for any slippage, and many local authorities were not clear how the timeline fitted with potential changes to their incumbent PCS.

Question 15 - Please rank the four options according to your preference – 1 being most preferred, 4 being least preferred, with an explanation.

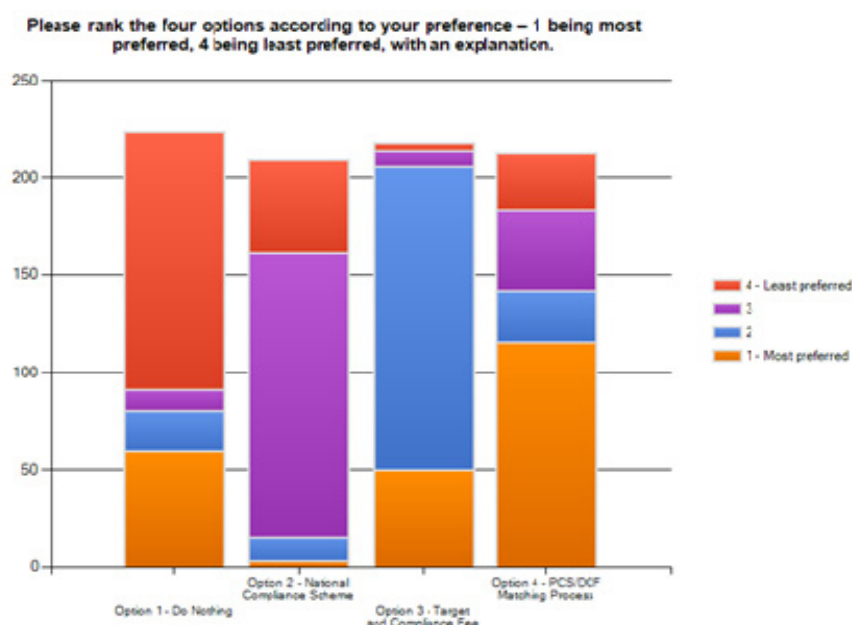
75. The suggested options were developed in response to the feedback received by Government from the Environment Theme of the Red Tape Challenge. The consultation proposed four options:

- Option 1: Do nothing/continue with current system;
- Option 2: A National Producer Compliance Scheme (instead of competition between current compliance schemes);
- Option 3: Setting targets for compliance schemes along with a “compliance fee” if these targets are not met; and
- Option 4: Matching collection sites to collection schemes.

76. We received 236 responses to this question although not all respondents ranked every option. Responses received were as follows:

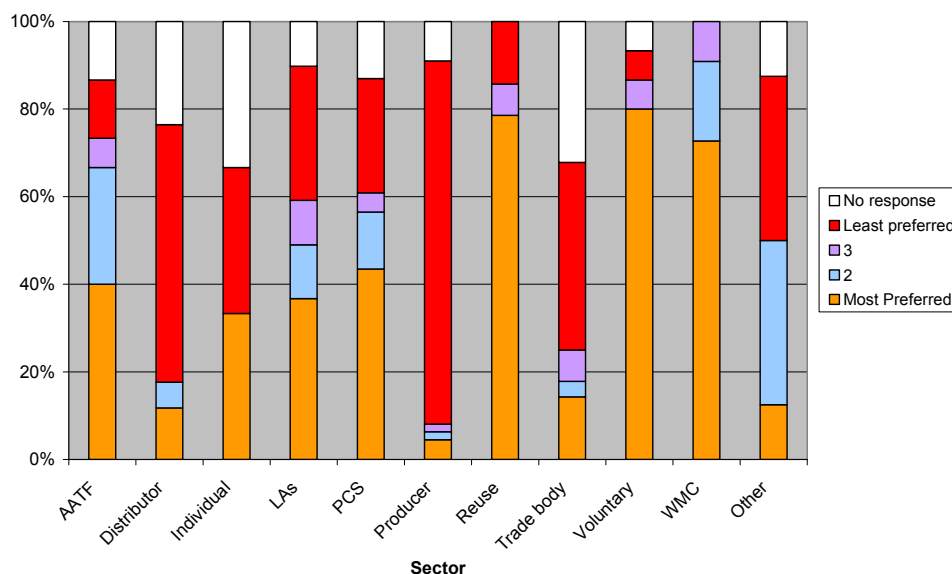
- 223 respondents ranked option 1,
- 209 respondents ranked option 2,
- 217 ranked option 3, and
- 212 ranked option 4.

77. The chart below shows all responses to this question.



Option 1 – Do Nothing

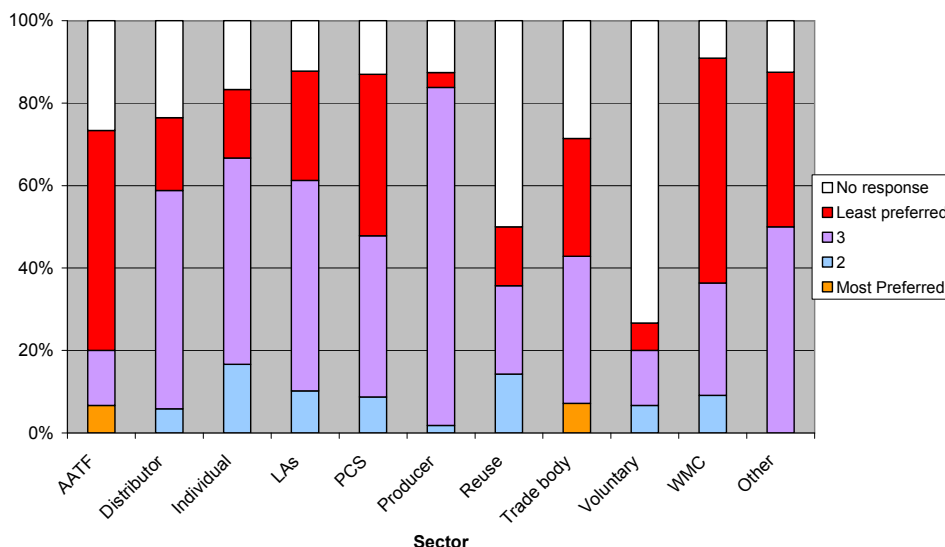
78. 132 of 223 respondents (59%) selected “do nothing” as their least preferred option. Out of the four options, this had the highest number of respondents selecting it as their least favoured option. Opposition came mainly from producers, distributors, trade bodies, some PCSs and some local authorities and their representative bodies. Producers who opposed “do nothing” generally agreed with the Impact Assessment and that all of the proposals for change would lead to lower compliance costs. PCSs who opposed “do nothing” generally felt the current system unfairly penalises under-collecting PCSs and therefore wanted to see a change to the way the system works.

Option 1. Shown by stakeholder group.

79.60 of 223 respondents (27%) selected “do nothing” as their most preferred option. Support for this option mainly came from some individual local authorities, some PCSs, Waste Management Companies, AATFs and the voluntary/reuse sector. Supporters of the ‘do nothing’ option generally felt they would lose out from implementation of any of the proposed changes and so would prefer to remain with the current system. Local authorities in favour of “do nothing” were concerned that they would see a reduction in funding available for their DCF sites if the current system was changed. AATFs in favour of “do nothing” saw any changes as potentially increasing their costs. The reuse sector was concerned reuse would go down with any of the options for change and so supported the “do nothing” option.

Option 2 – National Compliance Scheme

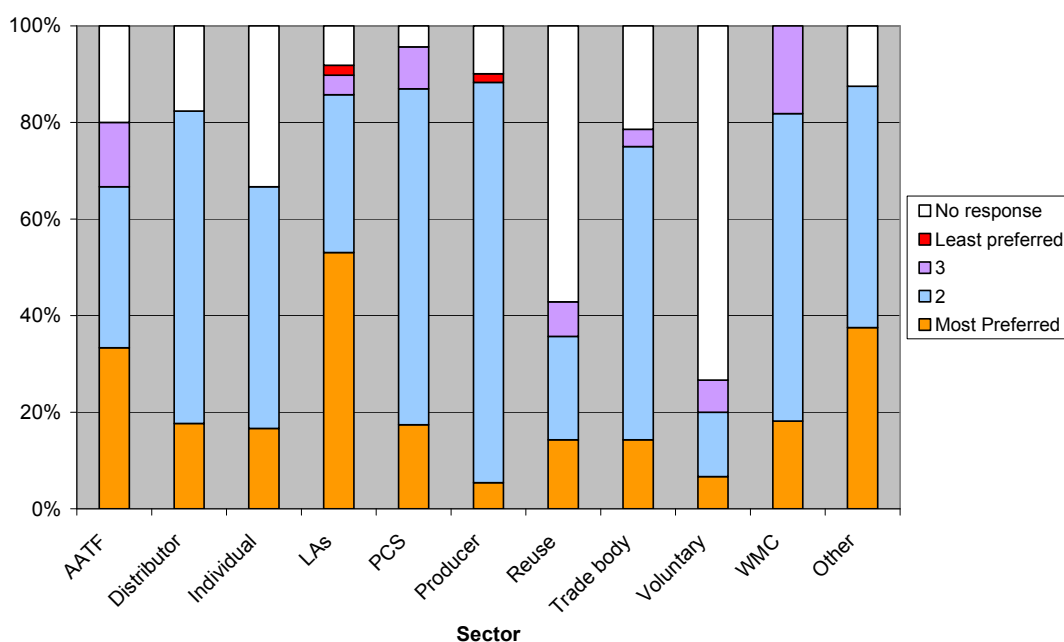
80. The proposal for a national compliance scheme was not popular with respondents, with 194 respondents (93%) choosing this as their 3rd or 4th ranked option. There was virtually no support from any of the stakeholder groups, with only 3 respondents overall (1%) selecting it as their most preferred option.

Option 2. Shown by stakeholder group.

81. There was a view shared across stakeholder groups that this option was monopolistic and could cause anti-competitive behaviour leading to higher costs for producers and negative impacts on the treatment sector. Stakeholders generally held similar concerns to those expressed in the consultation document and impact assessment.

Option 3 – Target and Compliance Fee

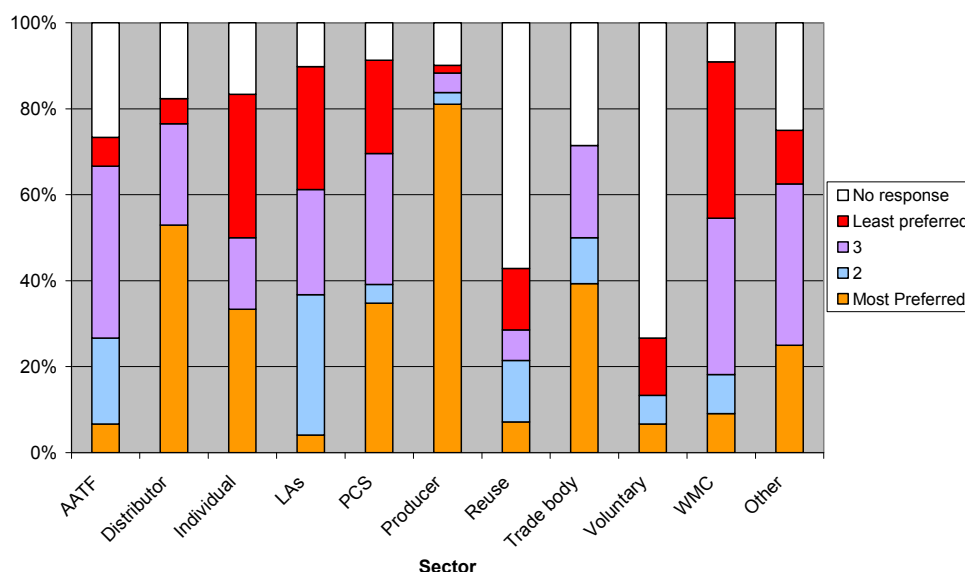
82. For Option 3 there was substantial support across all stakeholder groups. 206 of 217 respondents (95%) indicated it was either their first or second preference of the four options. Only 3 respondents (1%) chose this as their least preferred option. The chart below indicates the support for Option 3 split by key stakeholder group.

Option 3. Shown by stakeholder group.

83. The majority of local authorities selected option 3 as their 1st preference with most of the remainder supporting “do nothing”. Many local authority responses stated that even though “do nothing” would suit them, they recognise a need to change the WEEE system for the benefit of other stakeholders and so support option 3, as this option still contains many of the benefits of “do nothing” such as the freedom to choose their PCS partner. Local authorities were strongly opposed to option 4 as they lost this ability to choose who came to collect their WEEE. These views were supported by their representative bodies
84. Producers felt option 3 was a workable solution that was also a marked improvement on the current system. They saw the setting of the fee and the removal of evidence trading as critical to this option’s success.
85. The view from PCSs was mixed with some expressing similar views to producers, whereas others argued that there was no need to set a compliance fee. Some also felt that this option would discourage collections from outside the local authority DCF network.
86. Although WMCs were generally mostly supportive of the “do nothing” option there was still significant support for option 3 with many viewing this as a workable solution that would be the easiest and quickest to implement of the options for change.
87. This option was not supported by many individual third sector organisations. However, this view was not supported by a significant representative body of the reuse sector that instead supported a market based approach founded upon the market for those responsible financing the treatment of WEEE.
88. Some respondents acknowledge areas of Option 3 where further development is required. For example, how the compliance fee system would work to ensure that WEEE collection is best incentivised. It would also be important to ensure that the fee is not so low that schemes will be tempted to pay the fee rather than to collect but not be so high that it sets a threshold for the cost of treating WEEE.
89. Under Option 3 it is proposed to include a “Producer Take-Back Scheme” to mitigate the risk of a PCS being asked by DCFs to collect and finance WEEE in excess of its target and consequently incurring a disproportionate cost to its members. Some respondents had concerns around how this scheme will function to equitably share costs and how exactly the system will work to drive up the amount of WEEE collected.
90. A small number of treatment facilities (predominantly those treating hazardous lamps) argued that Option 3 will not give sufficient priority to hazardous WEEE and that all hazardous WEEE arising in the UK, irrespective of source, must be financed by producers.

Option 4 – PCS/DCF Matching Process

91. Although 116 respondents chose option 4 as their most preferred option, this was mostly made up of producers and their trade associations. Support from other stakeholder groups for this option came from some distributors and some PCSs.

Option 4. Shown by stakeholder group.

92. Many producers stated that, of all the options for change, this option would cut their compliance costs the most. They also stated this option had worked well in other member states.

93. Local authorities were the most vocal opponents to this option as it would remove their ability to choose their own PCS. Local authorities were very clear that this is one aspect of the current WEEE system that they wanted to keep. WMCs and AATFs were also generally opposed to this system and thought it unworkable given current contractual arrangements between local authorities and WMCs. Any necessary renegotiation of these contracts was likely to disadvantage local authorities.

94. This option was not supported by many individual third sector organisations. However, this view was not supported by a significant representative body of the reuse sector that instead supported a market based approach founded upon the market for those responsible financing the treatment of WEEE.

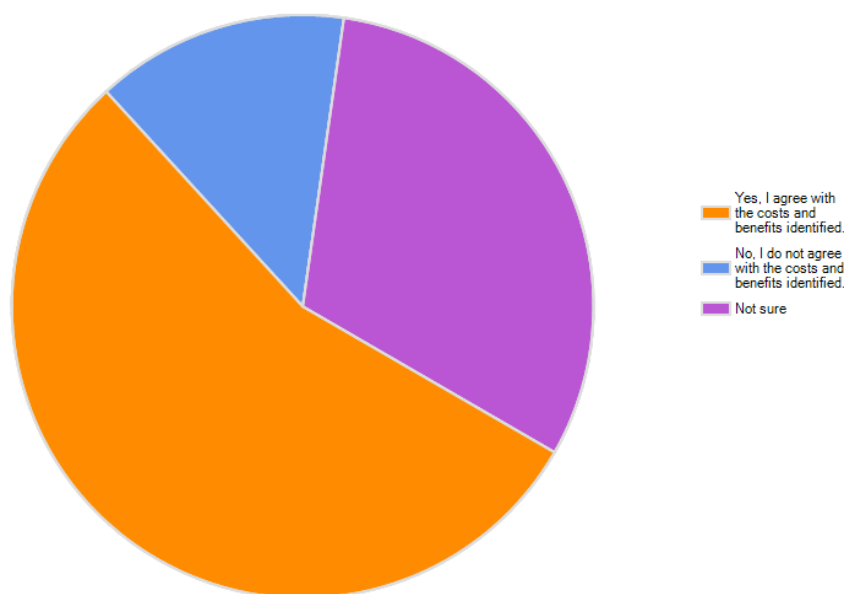
95. A risk highlighted by some respondents under option 4 was around the possibility of widespread under collection. Under option 4, since DCFs will be automatically allocated to PCSs according to their members' market share of EEE, they will not be required to compete with each other for access to collection contracts, reducing the incentive for PCSs to invest in measures to increase collection rates. A further risk is that councils could have multiple PCSs responsible for collecting different materials if allocation is determined by site or by waste stream. Thus this system could result in differing service levels, a lack of continuity, multiple contact points and inadequate accountability.

Question 16 - Have the WEEE Impact Assessments for the Recast Directive (IA no. 0382) and/or the WEEE system (IA no. 0393) identified the costs and

benefits arising from the proposed amendments to the UK WEEE Regulations? If not, please say why and provide supporting evidence.

96. We received 206 responses to this question. 113 respondents (55%) agreed that the Impact Assessments had identified the costs and benefits from the proposed amendments, 29 respondents (14%) did not agree with the costs and benefits and 64 (31%) were not sure.

Have the WEEE Impact Assessments for the Recast Directive (IA no. 0382) and/or the WEEE system (IA no. 0393) identified the costs and benefits arising from the proposed amendments to the UK WEEE Regulations? If not, please say why and provide supporting evidence.



97. Producers largely agreed with the calculations in the IAs, believing that they offer a reasonable reflection of the costs and benefits of the proposals given the difficulties of accurately calculating the impacts. Both those that agreed and disagreed with the costs and benefits identified in the IAs, generally supported the view that the assessments provide clear evidence for the need to change the current system. A small number presented some additional sources that support the conclusions of the IA.

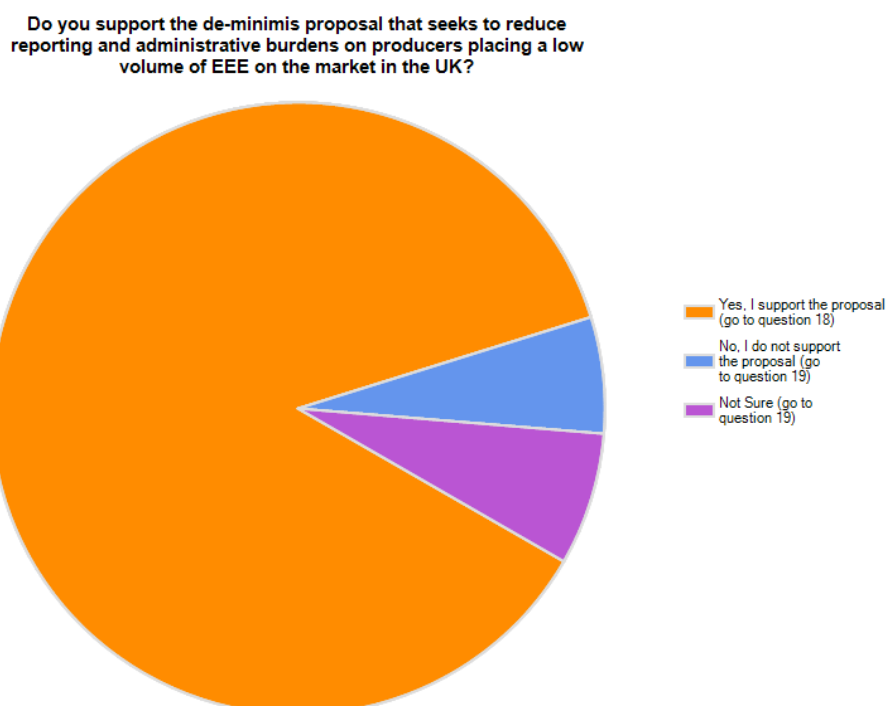
98. Some respondents highlighted areas that they felt were not adequately covered in the IAs. For example, some stated that IA 0393 does not adequately consider wider societal and commercial issues, whilst some others indicated that the costs of legal changes on existing contracts, administrative burdens and additional transport have not been fully incorporated. For IA 0382 a few respondents expressed the view that the IA did not fully assess the proposals to make substantiated estimates of WEEE that was not financed by producers.

99. A number of respondents who did not agree with the calculations pointed to alleged weaknesses in some of the assumptions used in the IAs, arguing that they are either not adequately substantiated or are untrue according to their own experience.

Questions 17 and 18 – The De Minimis Proposal

100. The de minimis question was asked in two parts. Question 17 asked: **Do you support the de minimis proposal that seeks to reduce reporting and administrative burdens on producers placing a low volume of EEE on the market in the UK?**

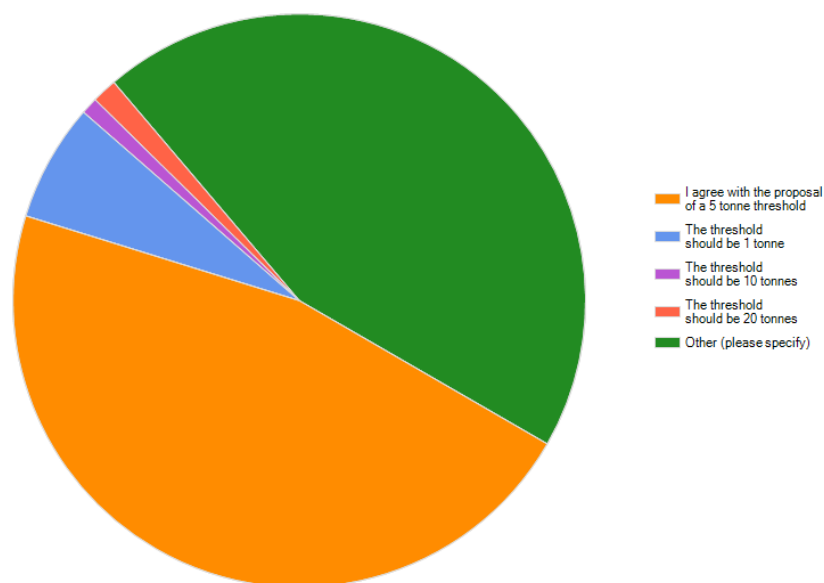
101. We received 228 responses to this question. 198 respondents (87%) supported the proposal of a de-minimis, 14 respondents (6%) did not support the proposal and 16 (7%) were not sure.



102. Question 18 asked: **Do you agree with the proposed threshold of 5 tonnes placed on the market? If not, please select your preferred threshold.**

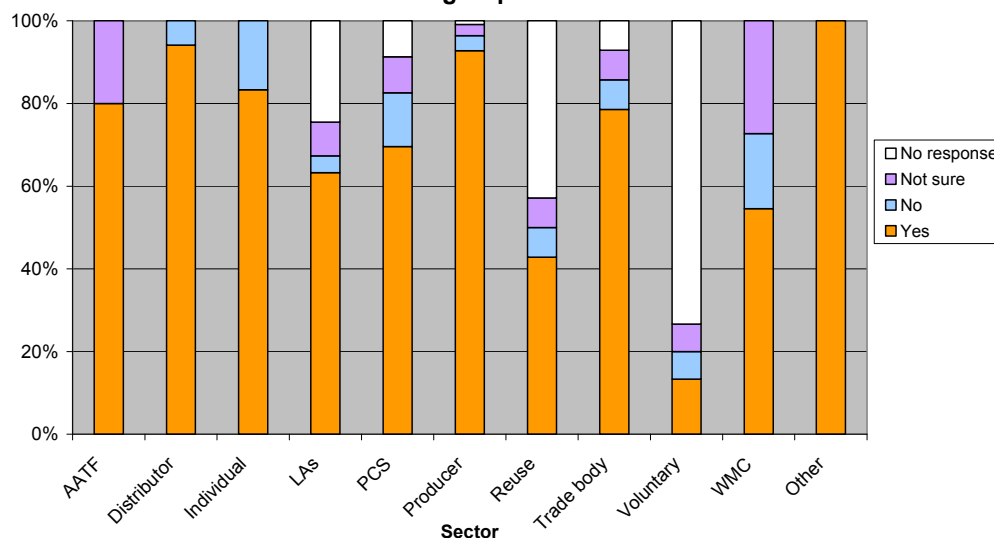
103. We received 211 responses to this question. 98 respondents (46%) supported the proposal of a 5 tonne de minimis, 19 (9%) supported the other suggested options of 1, 10 or 20 tonnes and 94 respondents (45%) specified “other” as their response.

Do you agree with the proposed threshold of 5 tonnes placed on the market? If not, please select your preferred threshold.



104. There was a large amount of support from all stakeholder groups for the de minimis proposals. However, there were mixed views on the level of the de minimis, with 46% supporting our proposal of a 5 tonne threshold and 45% selecting 'other' as their preference. Many producers and compliance schemes that selected 'other' generally agreed with the 5 tonne de minimis for all categories but thought that a reduced limit should apply for lamps. The rationale being that lamps are costly to recycle compared to other WEEE and that 5 tonnes represents a large quantity of lamps. No clear evidence was put forward to support a 1, 10 or 20 tonne limit.

Question 17 - Do you support the de minimis proposal that seeks to reduce reporting and administrative burdens on producers placing a low volume of EEE on the market in the UK? Shown by stakeholder group.

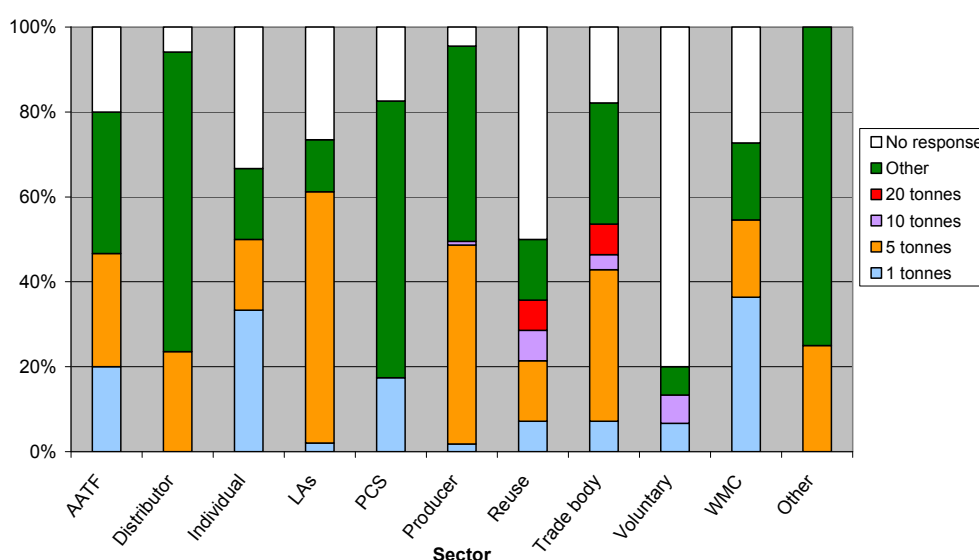


105. There was little support for the other proposed thresholds. Other suggestions as to how the proposal could work in practice included:

- Application of the de minimis threshold only for products that are classified as non-hazardous waste; and
- Some PCSs want the ability to directly register producers falling below the de minimis threshold.

106. There was concern from some producers that with local authorities opting to self treat the value WEEE streams, combined with small producers not having to register, costs of compliance for larger producers will increase more than stated in the IA.

Question 18 - Do you agree with the proposed threshold of 5 tonnes placed on the market? If not, please select your preferred threshold. Shown by stakeholder group.



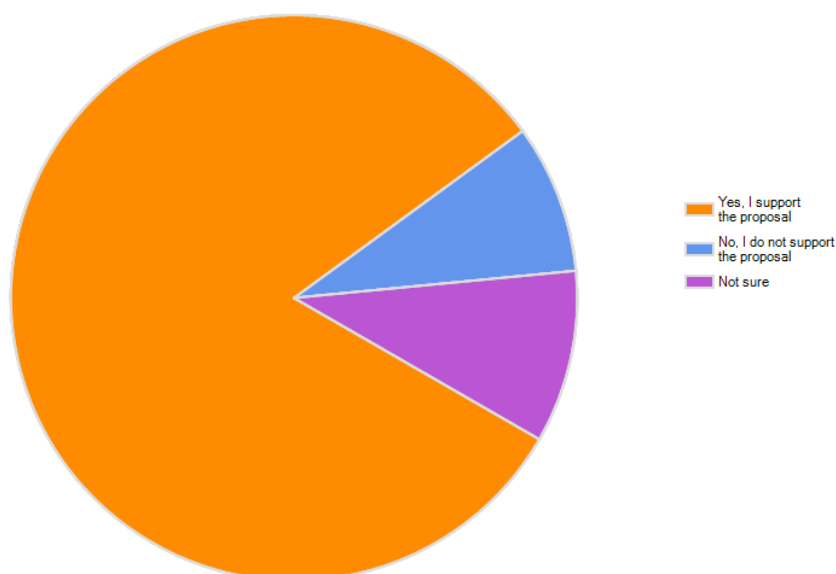
107. A small number of stakeholders did not support the proposals and raised a concern that implementing a de-minimis would mean that small producers no longer need to consider the impact of their products on the environment at the end of life.

Questions 19 and 20 - Self treatment of value streams by DCFs and associated Data Reporting.

108. Question 19 asked: **Do you support the proposal to allow DCF operators to choose, in advance of each compliance period, those WEEE streams for which they would make their own treatment arrangements and those they would hand over to compliance schemes?**

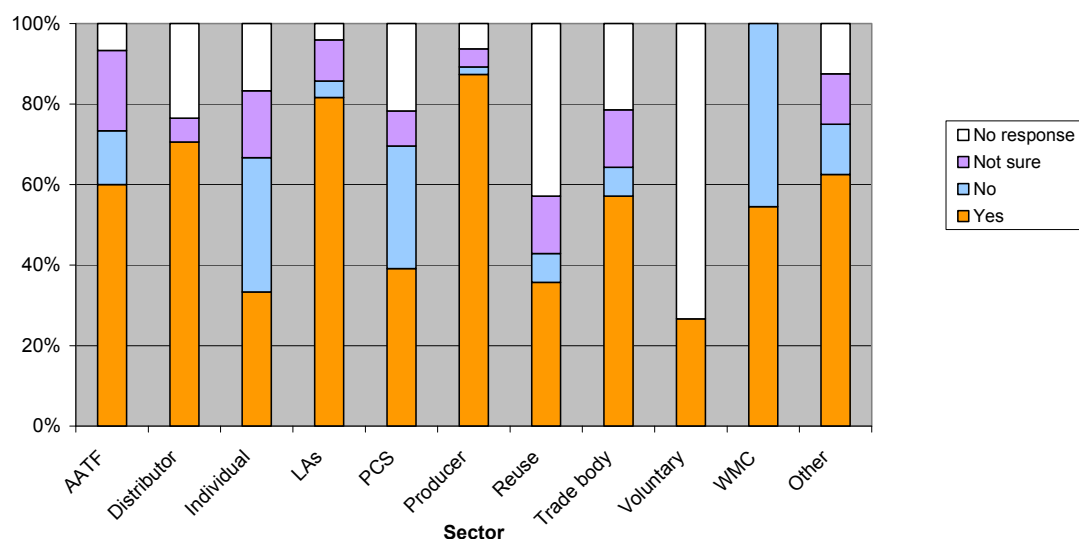
109. We received 223 responses to this question. 182 respondents (82%) supported the proposal for DCFs to have the option to “self treat” value streams, 19 respondents (8%) did not support the proposal and 22 respondents (10%) were not sure.

Do you support the proposal to allow DCF operators to choose, in advance of each compliance period, those WEEE streams for which they would make their own treatment arrangements and those they would hand over to compliance schemes?

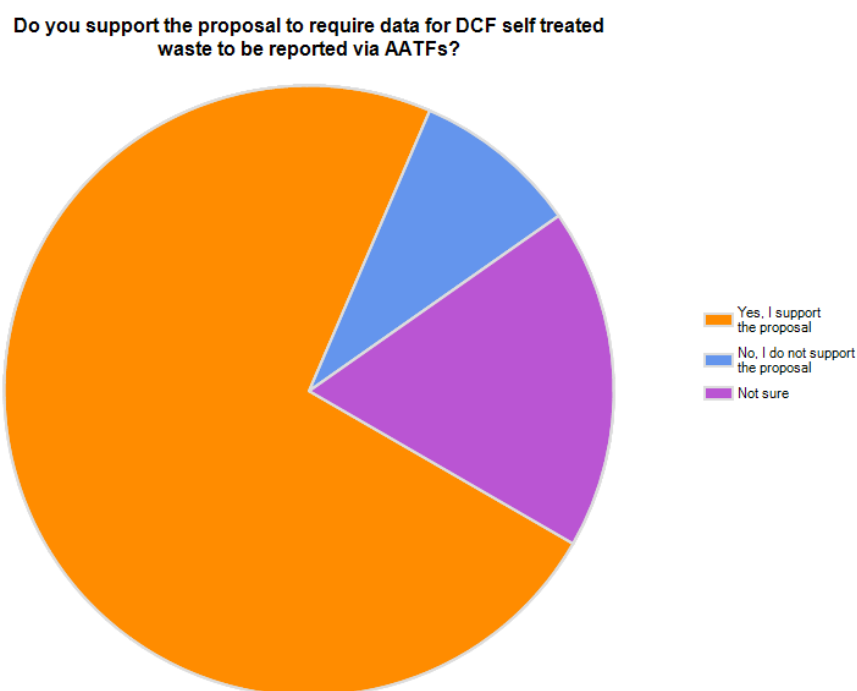


110. The proposal has the widespread support of local authorities (89%). Some representative organisations were supportive, whereas others were not sure and expressed concern that the proposal should not lead to increased costs for local authorities. A number of non-DCF stakeholders believe this option will not be widely adopted since local authorities see the risk of commodity prices falling to be too high and therefore the anticipated value streams becoming a loss to be financed by the local tax payer to commit to self-treating WEEE for a compliance year. Others commented that such risks should be able to be passed through to their WMC or AAFT partners through contractual terms.

Question 19 - Do you support the proposal to allow DCF operators to choose those WEEE streams for which they would make their own treatment arrangements and those they would hand over to compliance schemes? Shown by stakeholder group.

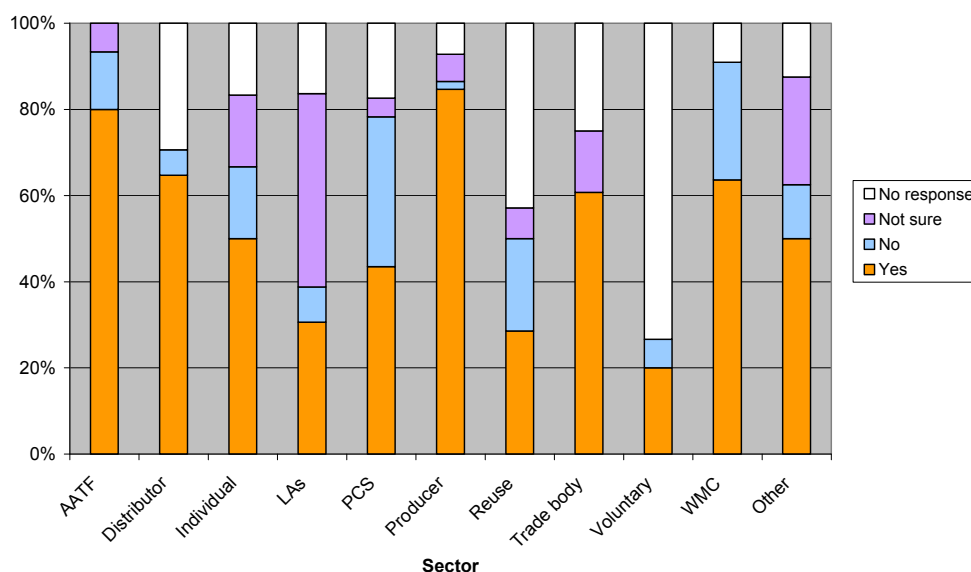


111. Some local authorities expressed concern that the proposal required a declaration some time ahead of the compliance year and the timing of the requirement to provide data which did not sit comfortably with WasteDataFlow reporting.
112. Concerns about the proposal were also expressed in relation to possible reductions in storage standards at DCF sites leading to reduced collection levels, reduced auditing of transport and treatment sites and a reduced focus on data reporting.
113. Question 20 asked: **Do you support the proposal to require data for DCF self treated waste to be reported via AATFs?**
114. We received 216 responses to this question. 158 respondents (73%) support the proposal that AATFs treating this WEEE should report the data, 19 respondents (9%) did not support the proposal and 39 respondents (18%) were not sure.



115. There was a particularly high level of support for the proposal from producers and AATFs. The view amongst local authorities was mixed with only 36% supporting the proposal for AATFs to report and 53% undecided – a view shared by a key local authority representative body.

Question 20 - Do you support the proposal to require data for DCF self treated waste to be reported via AATFs? Shown by stakeholder group.



116. A common view was that “self treated” WEEE streams are reported in a way that is accurate and avoids “double counting” in order to contribute towards the member state collection target.

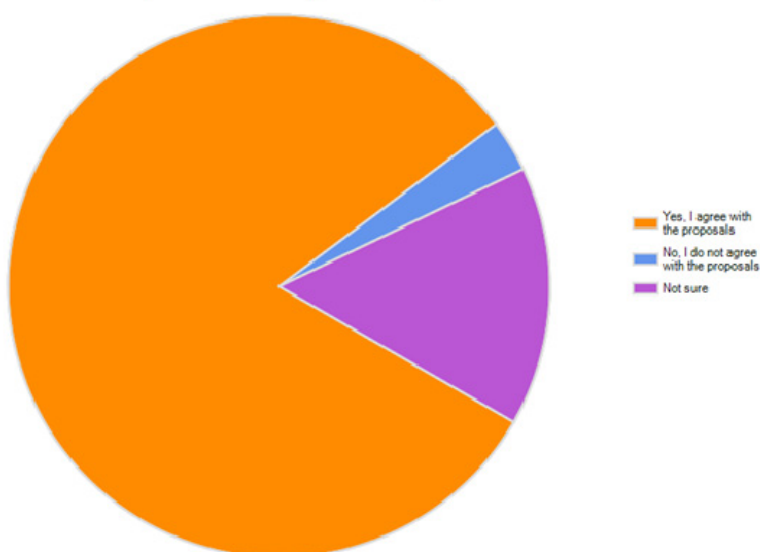
117. One suggestion was use of WasteDataFlow given concerns expressed about data quality issues arising from AATFs. Another was to ensure that in offering greater flexibility to local authorities, new reporting burdens were kept to a minimum. This quality concern was not perceived by AATFs who widely supported (75%) the view that this data should be reported by them, with many encouraging the use of the existing ICER template for reporting. There was a suggestion across key stakeholder groups that reporting by both local authorities and AATFs would validate data and therefore improve quality. Collection of data relating the volume of WEEE originating from Northern Ireland would be of particular benefit to authorities in Northern Ireland

Questions 21 and 22 - Powers of Entry (PoE) Proposals

118. Question 21 asked: **Do you agree with the proposals to introduce the additional safeguards in relation to powers of entry?**

119. We received 194 responses to this question. 158 respondents (81%) supported the proposals, 6 respondents (3%) did not support the proposals and 30 respondents (16%) were not sure. Overall, there was a large amount of support from all stakeholder groups for the proposals.

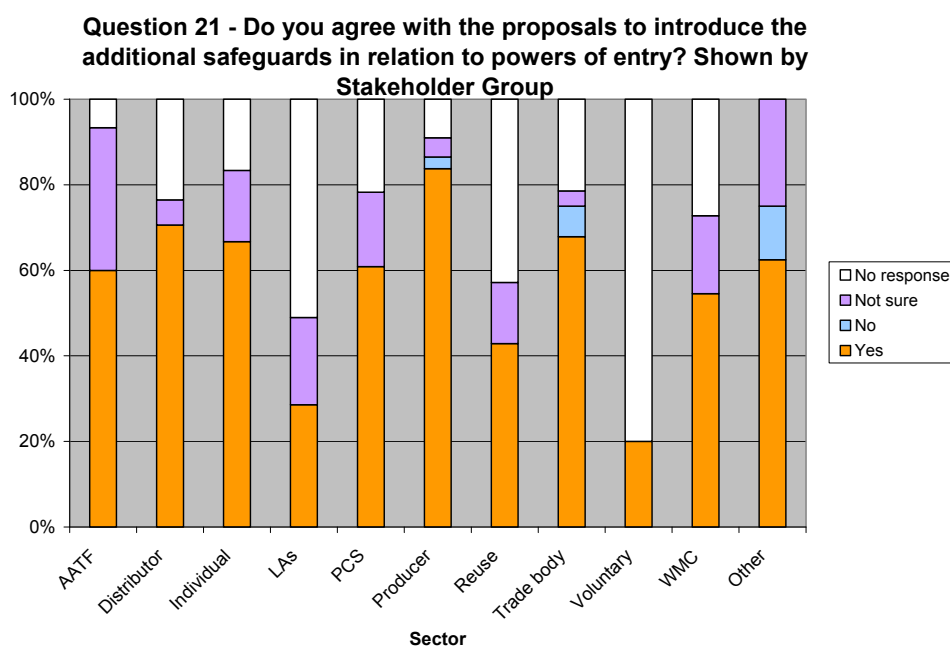
Q21 - Do you agree with the proposals to introduce the additional safeguards in relation to powers of entry?



120. Question 22 asked: **Are there any additional safeguards that you believe should apply? If so, please specify.**

121. We received 75 comments to this question.

122. There was very little opposition to the proposals from any stakeholder group. Organisations that did not support the proposals did not provide any significant rationale as to why. One organisation felt the proposals were opening up potential abuse opportunities, but did not expand on this any further.



123. A theme amongst local authorities was that many felt it was not their place to comment, it was for Producers and PCSs to comment on this proposal.

124. Areas where stakeholders felt that the proposals could be changed were:

- There should be no need for officers to provide copies of seized document, a receipt for seized documents should suffice;
- Warrants should be backed by a court of law;
- Shipping containers should be included in scope as premises;
- Stands at trade fairs should be out of scope as premises;
- There was a recommendation to follow Home Office Powers of Entry Code of Practice; and
- There was a request for private dwelling to be further defined in the context of a business operating from premises that were also private dwellings.

125. Proposals for additional safeguards included:

- A suggestion that the PoE requirements were strengthened to better enable the enforcement of BATRRRT; and
- Enforcement officers should have relevant safety training for premises they enter where needed.

Question 23 - Please tell us if there is anything else you wish to say about any aspect of the consultation

126. We received 204 responses to this question many of which used this question to reinforce points made elsewhere in their responses.

127. Local authorities were concerned that the increases in the Member State targets would increase the burden on their DCF infrastructure, which would require further funding to improve if it was to cope with the additional amounts of WEEE to be collected. They also had concerns on the potential impact caused by the adoption of options 2-4 may have on current contractual arrangements. Local authorities were concerned that contracts may need to be renegotiated if they contained a change of law clause.

128. Local authorities, especially those in Scotland, requested reassurance that any change in the WEEE system would not adversely affect collections from remote DCFs. Many local authorities also requested clarity around the future of funding available via the Distributor Takeback Scheme.

129. The consultation document noted that there is a lack of data on the composition of residual waste. Some local authorities have carried out analysis of residual waste and this could be made available to help inform work carried out in this area.

130. Representatives of local authorities felt that the option for them to self treat WEEE would improve reuse levels significantly by allowing the separation of items for reuse and resale at DCFs.

131. Charities generally felt that there should be more emphasis on re-use in the regulations. They suggested that BIS should set a 4% reuse target. They also felt that

there should be less emphasis on protocols and more emphasis on the reporting of actual data.

132. There was support from recyclers and reuse organisations for the consolidation of WEEE categories, and some support for the CENELEC standards for storage and transport that optimises potential for reuse. A PCS felt that The WEEE system did not need to change and elements of the Code of Practice should be incorporated in to the Regulations in order to strengthen them.
133. There was also some support from producers and recyclers to allow for a reduction in a producer's obligation for using approved recycled materials in their products.
134. Concerns were also raised about practises preparing WEEE for shredding and that CENELEC standards were not being adhered to. There were also concerns that with EEE shipped for reuse, only the functionality of the items is seen as important. It was felt that safety of the items should also be considered as important as functionality and all items of EEE shipped for reuse should meet the specifications of PAS141.

Annex A

List of Individuals/Organisations that Responded to the WEEE Consultation

Organisation
360 Environmental Ltd
A & R Cambridge Ltd (ARCAM)
Aberdeenshire Council
About Heating Ltd
Active Recycling
Advantage Waste Brokers Ltd
AGA Rangemaster Limited
Age UK
Aldabra Lighting Ltd
All WEEE Compliance
AmeyCespa Ltd
Arc21
ASDOWN DESIGN AND MARKETING LTD
Association of British Healthcare Industries (ABHI)
Association of Manufacturers of Domestic Appliances (AMDEA)
Axion Polymers
B& W Group Limited
B2B Compliance
Barnes & Mullins Ltd
Bath & North East Somerset Council
BEAMA Ltd
Beko
Bellaire Electronics
Beverage Standards Association
Blaenau Gwent County Borough Council
Blue UV Ltd
Boots UK Ltd
Bosch Thermotechnology Ltd.
Bose Limited
Bower Products Ltd
Branching Out
British Entertainment Industry Radio Group
British Heart Foundation
British Metals Recycling Association BMRA
British Retail Consortium
British Security Industry Association
BSH Home Appliances Ltd
BT plc

Budget Pack Ltd
Cambridgeshire and Peterborough Waste Partnership (RECAP), c/o Cambridge City Council
Cambridgeshire County Council
Canon (UK) Ltd.
Certsure
City of BradfordMDC
City of London Corporation
CIWM (Chartered Institution of Wastes Management)
Clandell Ltd
Clarity Environmental
Cliff Wood Limited
Community Resources Network Scotland
Comply Direct Ltd
Coolectric Limited
COSLA Council of Scottish Local authorities
Crispin Recycling
Crosslee Plc
CSS Recycling (Computer Salvage Specialists)
Cyrano Ltd
Dell Corporation Ltd.
Derbyshire County Council,
Devon County Council
DHL WEEE Compliance
Dialight Europe Ltd
Dicoll Ltd
dpac UK Ltd
Dusky Control Ltd
E.On UK PLC
East Sussex County Council/Brighton and Hove
ECI Lighting (NI) Ltd
Eclipse (Distributors) Ltd
Eco Communities
Ecodesign Centre
EDF Energy
EEESafe Ltd (and DASA Trade Association)
EEF
Electrical Waste Recycling Group Ltd
Electrolink
Electrolux
Emmaus
Emmaus Cambridge
Energy UK
Energys Energy Conservation Solutions Ltd
Enlightened Lamp Recycling Limited
Environmental Packaging Solutions

Environmental Services Association
Ergoline
ERP UK Ltd
Essex County Council
Etiquette Labels Ltd
European Metal Recycling Limited
Eye Lighting Europe Ltd
FCC Environment
Fermanagh District Council
Fisher & Paykel Appliances Ltd
FLAMERITE FIRES LTD
FMIC
Frank Craven
Furniture Re-use Network
FW lighting
G2S Ltd
GAFFNEY ENVIRONMENTALLIMITED
GAMBICA
GE Lighting Ltd
give2give
Glen Dimplex Home Appliances
Greater Manchester Waste Disposal Authority
Groupe SEB UK Ltd
Halfords Ltd.
Hampshire County Council on behalf of the Waste Disposal Authorities in Hampshire; Hampshire County Council, Portsmouth City Council and Southampton City Council
Havells Sylvania UK Ltd
Headstock Distribution Ltd
Heating and Hotwater Industry Council (HHIC)
Heraeus Noblelight Group UK
Hewlett Packard
Hitachi Europe
Hoover Limited
Howdens Joinery
Ian McQuaid
IBM UK Ltd
ICER
ILM Highland
Imetec UK Ltd.
Indesit Company UK Ltd
Insight Business Applications Limited
Intellect
Interled Lighting Ltd
International Lamps Ltd

John Hornby Skewes & Co Ltd
Joint Trade Association (JTA)*
Keighley Furniture Project
Kent County Council
Kenwood/DeLonghi
Kohler Mira Ltd
Lamp Source
LED Eco Lights Ltd.
Leicestershire Waste Partnership
LG Electronics
LGA
Lighting Analysts Ltd
Lighting Industry Association LIA
Lisburn City Council
Local Authority Recycling Advisory Committee
London Borough Lewisham
LUMICOM LTD
Luton Borough Council
Lutterworth Ecolighting Ltd
MAGIMIX UK LTD
Magnatech LED (UK) Ltd
MARLETON CROSS LTD MX GROUP
Marron Enterprise Ltd t/a The Green Light Company
May Gurney
MDJ Light Brothers (SP) Ltd
Meaco Measurement & Control
Mercury Recycling Limited
Merseyside Recycling and Waste Authority
Metech Recycling (UK) Ltd
Middlesbrough Council
Minimise Ltd
MobiCycle Ltd
Morphy Richards
Mount Soleil Ltd
Naim Audio Limited
National Association of Waste Disposal Officers (NAWDO)
Neolec Trading Ltd
Newmarket Open Door Ltd
Norfolk County Council (NCC)
Northern Ireland Local Government Association (NILGA)
North Lincolnshire Council
North London Waste Authority
North Yorkshire County Council
Nulife Glass Processing Ltd

Numatic International Ltd
Omega Lighting Ltd
Ortho Clinical Diagnostics
OSRAM Ltd
Oxfordshire Waste Partnership
Packaging Matters
Panasonic Electric Works Europe AG
Panasonic Energy Europe NV
Panasonic UK
Peavey Electronics LTD
Pembrokeshire County Council
Peter Lees Commercial Engineering
Petros EcoSolutions Ltd
Philips Electronics UK Ltd
Pixel-Plus
Plymouth City Council
Presto International UK Ltd
Professional Lighting & Sound Association
PV CYCLE
RDC
Really Green Credentials Ltd
Recolight
Redring Xpelair Group Ltd
REPIC Limited
REPIC RESC Limited
Repscot Limited
Resource Efficiency Wales Ltd acting on behalf of the South Wales Waste Management Group
RLT Lamp Sales/RLT Marine
Roalan Ltd
Rotherham Metropolitan Borough Council
Rotork plc
S Norton & Co Ltd
Samsung Electronics UK Ltd
Scottish Borders Council
Sevenoaks District Council
Sharp Electronics
Sims Group UK Limited
Small Electrical Appliance Marketing Association (SEAMA)
SMMT
Smyths Toys UK LTD
Sony United Kingdom and Ireland, a division of Sony Europe Limited.
Sound Leisure Ltd
Spectrum Brands (UK) Limited

Stage Electrics
Suffolk County Council (SCC)
Surrey County Council
Swale Borough Council
SWaMP
T2 Solutions UK Limited
Tesco Stores Ltd
The Conair Group Limited
The Environment Exchange
The Feel Good Group Ltd
The Vine Project
TLS UK Ltd
Toshiba Information Systems (UK) Ltd
Transform (Biffa Waste Services Ltd)
Trilight Ltd
Triton Showers
Tunbridge Wells Borough Council
Tyco
U V Light Technology
UKLED Ltd
Umicore
Valpak Ltd
Valpak Scotia Limited
Venture Lighting
Veolia ES WEEE Compliance Scheme (UK) Ltd
Vestel UK
Viridor
Wakefield Council
Warwickshire County Council
WE3 Compliance Limited
Weblight Ltd
WEEE Common Interest Group
WEEE Link Limited
WeeeCare PLC
WEEECOMPLY Ltd
West London Waste Authority
West Suffolk - Forest Heath District Council & St Edmundsbury Borough Council
Western Riverside Waste Authority
Wiltshire Council
WISER Recycling Ltd
WSL Ltd
XLED lighting co
Your Electrical Supplies Service & Solutions

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