

From: Redacted
Sent: 03 March 2015 10:22
To: Redacted
Cc:
Subject: RE: WEEE collection 2015 targets - discussion paper to be circulated next week
Attachments: 2015 WEEE targets paper to stakeholders.pdf

All,

Following ~~REDACTED~~ e-mail to you last week, please find attached the paper setting out the proposed WEEE collection targets for 2015. I'd be grateful if you would circulate this amongst your members and ask them to provide us with any comments by 5pm on Tuesday 10th March. Any comments should be sent to weee@bis.gsi.gov.uk.

I have also asked the environment agencies to circulate this paper to their registered AATFs and PCSs.

Many thanks,

Redacted

From: Redacted
Sent: 25 February 2015 10:42
To: Redacted
Cc: Redacted
Subject: WEEE collection 2015 targets - discussion paper to be circulated next week

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Just a heads up that we expect to send to you on either Monday or Tuesday next week a paper setting out the proposed WEEE collection targets for 2015. We have only a very short window in which to finalise the targets and ensure PCSs are notified by the agencies of their individual targets by 31 March. We will therefore only give you and your members 5 working days to respond (which is a similar timescale to last year).

You might therefore want to set aside some time next week to consider the paper and your response to it.

I would be grateful if you would alert your membership and cascade the paper as necessary when it is received. The agencies will send copies of the paper to their registered AATFs and PCSs.

Redacted grateful if you would forward this to members of the Joint Trade Association

Inevitably some people will receive from multiple sources but I think that is no bad thing given the time constraint for responses.

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2013 WEEE REGULATIONS - PROPOSED COLLECTION TARGETS FOR 2015

The 2013 WEEE Regulations require the Secretary of State to set the amount of WEEE falling within each category of EEE that is to be financed by producers via their membership of a Producer Compliance Scheme (PCS). This paper sets out the proposed collection targets for the 2015 compliance period. **Comments are sought by 5pm on Tuesday 10 March and should be sent to weee@bis.gsi.gov.uk.**

The proposed overall UK WEEE collection target for 2015 is **508,756 tonnes**. This is 18,225 tonnes higher than the total amount of household WEEE collected and recorded as evidence on the Settlement Centre in 2014. Table 1 shows how this overall target has been allocated across the 14 categories of WEEE.

The overall target is significantly above the collection levels necessary to achieve the UK Member State target of 484,661 tonnes¹ for 2015. However it is important that the targets placed on PCSs are reflective of likely WEEE arisings that producers have an obligation to finance.

Table 1: 2014 WEEE Collection Targets

Category Name	B2C collection 2010 (tonnes)	B2C collection 2011 (tonnes)	B2C collection 2012 (tonnes)	B2C collection 2013 (tonnes)	B2C collection 2014 (tonnes)	Average annual growth 2010-14 (%)	Pre-consultation target 2015 (tonnes)
1 Large Household Appliances	141,577	143,008	143,755	154,667	167,165	4.5%	174,730
2 Small Household Appliances	23,039	30,698	32,351	33,361	33,574	10.6%	37,121
3 IT and Telecomms Equipment	29,768	34,583	33,979	32,863	36,578	5.5%	38,608
4 Consumer Equipment	27,359	32,639	32,095	33,325	35,578	7.1%	38,087
5 Lighting Equipment	-	-	-	6	3	1028.7%	3
6 Electrical and Electronic Tools	11,500	16,052	15,936	16,458	17,609	12.2%	19,760
7 Toys Leisure and Sports	786	3,191	2,233	2,142	2,183	68.4%	3,677
8 Medical Devices	2	4	8	11	13	63.2%	21
9 Monitoring and Control Instruments	611	60	40	48	84	-6.8%	78
10 Automatic Dispensers	-	1	-	1	3	128.3%	7
10 Small Mixed WEEE (total)	93,064	117,226	116,642	118,215	125,625	-	137,362
11 Display Equipment Cooling Appliances Containing Refrigerants	130,254	142,588	135,316	100,255	83,544	-9.6%	75,563
12 Lamps	97,572	95,197	92,127	100,739	112,264	5.5%	118,408
13 Photovoltaics (PV)	690	870	902	834	1,933	38.5%	2,677
14	-	-	-	-	-	-	16
Total	463,157	498,890	488,742	474,710	490,531		508,756
Average: 484,661							

Methodology

Two different approaches to setting the targets were considered:

Option 1: Targets based on last year's growth in tonnes of WEEE collected for each category.

Option 2: Targets based on the average annual growth in tonnes of WEEE collected for each category since 2010.

¹ EU directive states that until 2016 the target that applies to each Member State is equal to the weight of WEEE that was collected on average in the three preceding years. The target has been rounded to the nearest 10,000 tonnes.

Option 2 has been selected on the basis that it is more robust. This is because it mitigates the effect of outliers in the data, with the subsequent figure reflective of the general trend in collection volumes over the last five years.

However, some manual adjustments have been made where the previous growth trend is not judged to be reflective of current market dynamics. As follows:

- **Category 5 Lighting** – An increase in line with the annual average growth since 2010 would result in a target of 35 tonnes. However this category saw tonnage appear for the first time in 2013 as a consequence of LED lamp sources appearing as waste. This was reduced in 2014 as a consequence of much of that now being classified as Category 13 Lamps. We therefore propose to set a target of 3 tonnes in line with 2014 collections.
- **Category 11 display** – No adjustments to this category have been made. There has been a decline of tonnage since 2011 as a consequence of the peak of recycling at the time of the digital switchover and the continuing light weighting of the display equipment appearing as waste. We particularly welcome comments supported by evidence on whether the average annual negative growth of 9.6% is reflective of the likely trend through 2015.
- **Cat 14 PV panels** – As there was a zero target set for PV panels in 2014, it is not possible to establish a growth trend for this category. We therefore propose to set the 2015 target for PV panels at 16 tonnes, which is in line with the amount of B2C tonnage of PV panels that was collected in 2014. We would however welcome comments, supported by evidence, on whether this figure should be adjusted.

Dual Use Impacts

Following stakeholder consultation last year the Government announced its decision to amend its official guidance to reflect the European Commission's interpretation in relation to "dual use" equipment (i.e. that which is placed on the market and arises as waste that is likely to be used by household and non-household end users). The Environment Agency subsequently set out its enforcement position in relation to the reporting of dual-use WEEE.

It follows that an increase in the classification of household WEEE arising from non-household sources is possible in 2015. Analysis undertaken internally suggests that there is only likely to be a proportionately significant impact on categories 3 (IT & Telecomms) and 13 (Lamps). This has been considered in setting the 2015 collection targets.

The proposed target setting methodology sets an overall target of 137,362 tonnes for small mixed WEEE in 2015. This is an uplift of 11,737 tonnes compared with 2014 collections. We believe this would be an extremely challenging target to meet through traditional household WEEE collection routes. However, we do not propose to adjust this target given that we anticipate some PCSs may seek to achieve their targets by supplementing their existing arrangements with collections of dual use WEEE from non-household end users in 2015.

The substantial increase in Category 13 household WEEE collections in 2014 follows the changes to dual use interpretation announced in October when a significant volume of collections previously reported as non-household were reported as household WEEE. To set the target to fully reflect all non-household waste lamp arisings would result in a target of 4,847 tonnes. This however would place a significant additional cost burden on those producers that put household lamps on the market in 2014 and would benefit non-household producers who would be less likely to receive any WEEE for treatment.

On the other hand, to set a target in line with that set for 2014 would lead to a significant over-supply of lamp evidence. This is likely to disadvantage PCSs with category 13 collection contracts

with local authorities but with a zero or negligible share of the target. The lack of demand amongst PCSs would also drive evidence costs down to the significant detriment of lamp recyclers. In both cases there would be little or no demand for the potential evidence they produce. The target of 2,677 tonnes is in the mid-range and balances the additional costs to household producers against the risks to lamp recyclers and certain PCSs.