

Regulatory position statement

The crushing of fluorescent tubes at WEEE collection points

If you comply with the requirements below, we will allow the crushing of waste fluorescent tubes at WEEE collection points without the need for an environmental permit

Background

Schedule 3 of the Environmental Permitting Regulations (EPR) 2010 provides an exemption for the crushing of fluorescent tubes to reduce their volume prior to collection. Crushing can be carried out using static equipment located on the site or by mobile crusher.

The T17 exemption specifies that the crushing must be carried out at the place of production. This means that WEEE collection points¹, sites established to encourage lamp recycling, are prevented from benefiting from the exemption.

We consider the environmental risk of crushing at the place of production to be the same as crushing at WEEE collection points. We will therefore allow collection points to be registered for T17 activities provided the requirements of this position are complied with.

Our approach

We will not pursue an application for an environmental permit for the activity where:

- fluorescent tubes are crushed at a WEEE collection point
- a T17 exemption is registered for the crushing activity and all requirements of T17 are complied with except for sub-paragraph 3b (place of production)
- the crushing activities are carried out in accordance with best available treatment, recovery and recycling techniques².

¹ "collection point" means a place which is used for the collection of waste by an establishment or undertaking where the establishment or undertaking does not—(a) receive payment for collecting the waste, or (b) collect waste as its main business activity;

² "best available treatment, recovery and recycling techniques" has the meaning given in the document published jointly by the Department for Environment, Food and Rural Affairs, the Welsh Assembly Government and the Scottish Executive on 27th November 2006, entitled "Guidance on Best Available Treatment, Recovery and Recycling Techniques (BATRRT) and Treatment of Waste Electrical and Electronic Equipment (WEEE)" <http://archive.defra.gov.uk/environment/waste/producer/electrical/documents/weee-batrrt-guidance.pdf>

- You meet the relevant objectives of the Waste Framework Directive;
'... ensuring that waste management is carried out without endangering human health, without harming the environment and in particular:
 - (i) without risk to water, air, soil, plants or animals;
 - (ii) without causing a nuisance through noise or odours; and
 - (iii) without adversely affecting the countryside or places of special interest.'

Fluorescent tubes are also subject to the requirements of the Hazardous Waste Regulations. Further details about your obligations can be found on our [website](#).

Enforcement

In not pursuing an application for a permit, we will not normally take enforcement action unless the activity has caused, or is likely to cause, pollution or harm to health. For a more detailed explanation of this enforcement position, please see our [Enforcement and Sanctions](#) statement. This can be found on the '[How we regulate you](#)' page in the Business & Industry section of our web site.

This regulatory position will be reviewed by 1st October 2013.

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This document is out of date and has been withdrawn (16/12/2016).

Crushing waste fluorescent tubes (T17)

17.—(1) The crushing of relevant waste for the purposes of volume reduction prior to collection.

(2) The table specifying relevant waste for the purposes of this paragraph is set out below.

Codes	Waste types
200121*	Fluorescent tubes only

(3) For the purposes of this paragraph, the specific conditions are that—

(a) the total quantity of waste crushed over any period of 24 hours does not exceed 3 tonnes;

(b) the crushing is carried on at the place of production;

(c) the equipment used for crushing is designed for the purposes of crushing and volume reduction;

(d) the mercury concentration in any resultant emissions does not exceed 25 microgrammes per cubic metre; and

(e) any glass or mercury released after crushing is stored in a secure container under weatherproof covering.

This document is out of date and has been withdrawn (16/12/2016).