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BERR WEEE Consultation response from the Local Authority Recycling Advisory Committee – April 2009

1. Will the outlined proposals ease the overall administrative burden on the UK WEEE system?

LARAC continues to be very concerned that the regulations have been driven by the perceived need to provide lowest cost options to both producers and distributors and not to find the optimal solution balancing the priorities of environmental benefit and cost. The fact is that in the drive to minimise costs to the private sector the regulations demand that the public sector provides additional capacity, and in some cases funding, to enable compliance schemes to achieve their members' targets at minimal cost. This often does not create an incentive to maximise the amount of WEEE recycled.

2. Are the options open to distributors in discharging their take-back obligations still desirable?

70% of DCFs in the UK are local authority controlled Household Waste Reuse and Recycling Centres (HWRRC). LARAC believes the continued use of HWRRCs is a sensible option given that resident behaviour patterns have, to a degree, been developed. Ending this disposal opportunity would breed confusion, frustration and resentment.

LARAC would like to see a substantial improvement in consumer opportunities for in-store take back and the services provided to be effectively communicated to customers purchasing WEEE. LARAC believes opportunities exist to substantially increase the recycling of small WEEE and an expanded and well publicized network of stores taking back WEEE would help address this problem.

From LARAC's perspective the network of takeback opportunities is not as extensive as resident demand necessitates.



3. If DTS option is to continue on what basis should funding for the scheme be established?

LARAC believes funding for the scheme should be increased to help meet the financial and administrative burdens its members face in procurement of DCF services, site management and site publicity.

LARAC believes a minimum level of funding raised would support better planning and decision making.

LARAC would like to see a scheme that enables investment in vehicles, containers, signage and data, with a significant contribution to the costs of communications and public relations. LARAC supports any funding mechanism that supports robust auditing and enforcement of DTS performance.

4. If DTS remains a desirable option to discharge obligations, what level of funding should be made available to local authorities.

The cost exposure and administrative burden to LARAC members (DCF operators) varies significantly dependent upon procurement activity undertaken, retraining of call centre staff required, quantity of WEEE collected and performance of the PCS used. Where Producer Compliance Schemes have failed to collect WEEE at a DCF significant officer time is necessary to resolve the problem. LARAC would like to see these costs recognized.

LARAC members are coming under pressure from the public to collect a number of additional waste materials included small WEEE at the doorstep because of increased environmental awareness and concern. Many householders do not wish for WEEE to be landfilled but the in-store take-back network is not yet sufficient to meet demand.

Given the above and the fact that the local authority DCF network plays such a pivotal role in the success of the UK WEEE system LARAC would like to see the following:

- 1) The flat payment to all DCF operators maintained.
(Signage/Information/Steps/Increase range of materials collected)
- 2) Additional help from producers for authorities experiencing unacceptable burdens.
- 3) Funding to develop WEEE collections - bring sites collections for small WEEE and/or doorstep collections of small WEEE. Although these may not be considered at the moment, it is necessary to develop a medium term strategic perspective that will enable future revised targets to be met



LARAC members currently find themselves spending significant periods of time explaining via letter or email why WEEE is not collected at the doorstep. LARAC is concerned that a piece of producer responsibility legislation (WEEE Regulations) has produced a significant administrative and financial burden on local authorities that should be lifted by appropriate funding being provided.

5. If funds from a central scheme were made available how would local authority DCF operators use the money for the benefit of the UK WEEE system and supporting infrastructure?

As above.

6. What key elements of the Code of Practice need to be addressed?

Audit trail of all WEEE collected 11.2 b – Concerns still exist about WEEE going to developing countries and inappropriate disposal methods used. This is perceived as devaluing the effort of residents. Greater clarity of disposal routes for materials from each PCS would be welcomed.

Needs input from other operating dcf sites

7. Will the proposed changes to the PCS approval process help improve the effectiveness of the UK WEEE system?

The approval process is not an area that directly effects the LARAC members and therefore we do not feel qualified to comment on this aspect of the consultation.

8. Will the two stage PCS approval process, including the ability of the agencies to judge past performance of schemes, result in close co-operation and cross working between PCSs?

Again, this is not an area that concerns LARAC members and therefore we do not feel qualified to comment on this aspect of the consultation.

9. Will the outlined proposals ease administrative burdens on Approved Treatment Facilities and Approved Exporters?

LARAC would like to highlight the importance it places on compliance checks to ensure materials are being recycled/recovered appropriately, and in the quantities reported and would welcome a strengthening of this element of the Regulation. Persistent and deliberate misreporting and inappropriate disposal methods must be dealt with appropriately as this poor behaviour brings the whole WEEE system into disrepute.



10. Will the proposed changes to the evidence system described reduce the administrative burdens on AATFs/AEs and PCSs?

Other than the comments made above, members of LARAC do not have any specific comments to make about the proposed changes to the evidence system.

11. Will the changes to the approval criteria for AATFs and AEs result in higher overall standards of treatment and recovery within the UK WEEE system?

LARAC welcomes the expansion of approval criteria to include a requirement that all WEEE received must be treated or sent for reuse.

LARAC also supports the proposal to maintain the AATFs/AEs responsibility for mechanisms and checks to ensure WEEE passes through the treatment chain via licensed or permitted organisations.