



Local Authority Recycling Advisory Committee

European Commission
DG Environment, Unit G\$
BU5 - 5/121
Review of Directive 2002/96/EC (WEEE)
B-1049, Brussels, Belgium
Email: ENV-WEEE@ec.europa.eu

4th June 2008

Dear Sirs,

**Consultation Response - STAKEHOLDER CONSULTATION ON THE
REVIEW OF DIRECTIVE 2002/96/EC OF THE EUROPEAN PARLIAMENT
AND OF THE COUNCIL ON WASTE ELECTRICAL AND ELECTRONIC
EQUIPMENT (WEEE)**

I am writing to present the LARAC response to the above Consultation, which is contained below, and I thank you for the opportunity to respond to the above consultation.

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Overleaf are our detailed comments as requested in the consultation.

If you have any queries on this response or would like to discuss the matter further then please contact me on 02076 417 026 or probson@westminster.gov.uk

Yours faithfully,

Phil Robson
LARAC Policy Team



Local Authority Recycling Advisory Committee

STAKEHOLDER CONSULTATION ON THE REVIEW OF DIRECTIVE 2002/96/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ON WASTE ELECTRICAL AND ELECTRONIC EQUIPMENT (WEEE)

The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of well over 400 local authorities across England, Scotland Wales and Northern Ireland whose waste management and recycling professionals' co-ordinate and operate waste management services. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary.

Local Authority Recycling Advisory Committee (LARAC) supports the review of the directive and its explicit intention to prevent waste, to reduce the disposal of waste, and to improve the environmental performance of all operators involved.

3.1 Targets on collection

LARAC supports those initiatives that seek to increase the quantity of WEEE reduced, reused and recycled using producer responsibility as a fundamental principle.

LARAC considers **fixed mandatory collection targets** differentiated per Member State expressed in weight per inhabitant per year to be achieved by a certain date as its preferred option. Fixed mandatory targets would allow clearer stakeholder engagement by WEEE producers (manufacturers/retailers) because a single figure is clearer to communicate.

An **obligatory give-back** by collection points to the producer responsibility organisations (PRO's) or to individual schemes is our least favoured option because it is not considered significantly different to the current legislation and would not, in our opinion, yield meaningful increases in WEEE reduction, reuse and recycling.

Targets for recovery, component, material and substance reuse and recycling

LARAC would support an option to increase collections and reprocessing of the most environmentally damaging WEEE.

Category 8 equipment (medical devices) is not a category of waste that LARAC members routinely collect and therefore does not feel sufficiently experienced to make informed comment.



Local Authority Recycling Advisory Committee

LARAC favours those methods of waste treatment at the top of the waste hierarchy (unless Life Cycle Assessment concludes otherwise) and therefore the stimulation of outlet market for recycled and recovered products, in particular for encouraging high level of material re-application is our favoured option. However, significant merit can be identified in increasing the current targets, for all or some categories and material based targets for all WEEE or per product category.

LARAC's chief concerns would relate to the practical implementation of the subsumed Directive if the number of categories or the quantities of waste collected at DCFs increased to expose its members to additional direct costs. Given the amount of space at many LARAC members DCFs are limited collecting additional quantities and/or categories could cause a crowding out of other reuse and recycling initiatives.

Targets for reuse of whole appliances

It seems outside the manufacturers and retailers powers to control the proportion of reusable waste they receive and therefore setting a target of whole appliances to be achieved by a certain date for reuse would seem problematic. However, if a SMART target for the reuse of whole appliances could be established LARAC would support such an initiative.

LARAC also supports the **obligatory access** for the reuse sector / organisations to collected WEEE to select that equipment that could meet the criteria for being reused, refurbished or repaired. This access would be restricted to those organisations meeting certain licensing criteria and providing auditable trails for management of the materials streams.

3.2 The Scope of the Directive

Options for clarification of the scope

LARAC supports an extension of the list of products falling under the scope of the Directive as it will ultimately generate more producer responsibility and as a result an expansion in the reduction, reuse and recycling of WEEE.

Options on the width of the scope

LARAC supports the inclusion of (other) types of products/product categories in the scope of the Directive and to maximise the scope to all EEE (also above 1000Volt AC or 1500Volt DC) and to spare parts and components as so to maximize the reuse and recycling of WEEE.



Local Authority Recycling Advisory Committee

LARAC is not inclined to support initiatives to support the **exclusion** of types of products/product categories from the scope unless wider life cycle assessment or climate change impact assessments conclude otherwise.

3.3 The Operation of the Producer Responsibility Provisions

LARAC supports the assertion that the built in flexibility of the legislation when subsumed into UK law has led to a sub-optimal contribution to the improvement of the environmental performance of operators and systems as regards organisational responsibilities (collection – take-back and treatment), financial responsibilities, products (labelling and eco-design) and information (to treatment operators, consumers and authorities including reporting and registration).

LARAC would support a strengthening of the legislation to promote

- a) in-store take-back,
- b) detailed in-store information on reuse and recycling,
- c) detailed area specific labelling on reuse and recycling.
- d) More financial support for local authorities to provide expanded and enhanced Designated Collection Facilities (DCF).

LARAC backs initiatives to maximize the reduction and reuse of WEEE and therefore supports the proposal to stimulate eco-design through defining targets for reusability, recyclability and recoverability of electrical and electronic equipment.

3.4 Treatment Requirements

LARAC wholeheartedly supports the option to develop treatment standards, thereby moving towards optimal treatment of WEEE and a higher environmental impact.