



Local Authority Recycling Advisory Committee

Adrian Harding
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29th October 2004.

Dear Adrian,

CONSULTATION ON GUIDANCE ON TREATMENT OF WEEE

Thank you for the opportunity to respond to the consultation paper on the Guidance on Treatment of WEEE. The comments below are sent on behalf of the Local Authority Recycling Advisory Committee (LARAC). LARAC is an association of over 430 local authorities, drawn from Scotland, Wales, Northern Ireland and England. Whose waste management and recycling professionals coordinate and operate waste management services for their authorities. Membership is drawn from all types of authority including statutory Waste Collection (WCA), Waste Disposal (WDA) and Unitary Authorities. As a national organisation LARAC would like these comments to be considered as representative of the general feelings of all UK local authorities and considered by the Environment Agency and counterpart organisations established within the Devolved Assemblies.

LARAC has been pleased to contribute to the DTI's Project Group to discuss the operation of the National Clearing House (NCH) and has found this a most informative forum for the discussion of detailed concerns within the proposed NCH model. It is perhaps regrettable that this Group has failed to reach agreement on some of these details albeit that it has determined a consensus on several key parameters. Whilst it is acknowledged that treatment standards for WEEE will determine the recovery processes and ultimate market values/cost for handling WEEE, LARAC does not per se have definitive views on what constitute appropriate treatment processes. Therefore the comments below relate to proposals within the consultation document that LARAC believe will have a direct affect upon the separation and storage of WEEE, which is where local authorities are likely to be involved in the recovery chain.

With regard to the reuse of whole items, LARAC is keen to ensure that there are opportunities for optimising this throughout the recovery chain. It is probably a reasonably fair comment to say as in Question 1 "all opportunities for reuse of whole items have been exhausted by the time WEEE reaches an ATF". However, LARAC supports the principle of maximising the reuse of WEEE so long as it does not compromise the effective operation of any civic amenity Designated Collection Facilities (DCF). As I am sure the Agencies are aware these sites are often operated on very cramped sites and therefore whilst an initial assessment of the reusability of an item might be conducted on a DCF, LARAC would not like to see the Treatment Guidance specify this as the only option. Furthermore as recovery is anticipated of all WEEE categories under the Directive, we do



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not know the extent to which smaller WEEE items may still be in a condition for reuse when arriving at an ATF. We would therefore urge some flexibility in the designation process so that reuse at ATFs is not precluded.

With regard to Directive requirements for storage, LARAC would welcome the contribution of the Agencies to the ongoing work between producers and local authorities to determine the specification for a DCF and its consequent impact on the funds that are needed to adapt any standard civic amenity site to an approved DCF. Similarly, some guidance would be welcomed from the Agencies on what modifications to licensing arrangements are likely to be needed to accommodate the separate collection and storage of WEEE at a DCF. Also what is the environment agencies' view in respect of waste ownership for duty of care purposes? Again this will all contribute to likely local authority costs and as importantly will be a key issue in being able to establish the National Clearing House in suitable time to be effective from August 2005.

Finally, LARAC would like to be assured that whatever, if any, data reporting requirements fall on local authorities, they are not burdensome and allow the identification of materials reused, recycled and recovered so that this data can be incorporated into local and national performance management reporting.

We hope that these comments are helpful and whilst not specific to your suggested questions are reflective of the issues that of key concern to local authorities in determining the treatment guidance for WEEE.

Yours sincerely

Andy Doran
LARAC Chair