

Belfast City Council draft response to the consultation on reforming the producer responsibility system for waste electrical and electronic equipment.

1. What is your name?

Answer: Belfast City Council

2. What is your email address?

Answer: stephensj@belfastcity.gov.uk

3. Which of the following best describes you?

About you

- trade body or other business representative organisation
- electronic producer
- Producer Compliance Scheme
- distributor (including online marketplace)
- waste management company
- waste operator or re-processor
- exporter
- local government
- community group
- non-governmental organisation
- charity or social enterprise
- re-use or repair operator
- consultancy
- academic or research
- individual (ie not representing an organisation)
- other
- If you answered 'Other', please provide details

Answer: Local Government

**4. Would you like your response to be confidential? a. Yes
b. No**

Answer: No

5. If you answered 'Yes' to question 4, please briefly explain why you require your response to be confidential.

N/A

Increasing collections of waste electrical and electronic equipment from households

6. Do you agree or disagree that producers (and distributors that do not provide their own take-back services for electric and electronic goods) should finance collections of small WEEE (for example, toasters, small toys and tools), from households? Please select one of the following options:

a. Agree b. Disagree c. Unsure

Answer: (a) Agree

7. Please provide any evidence you have to support your answer to question 6.

This is in line with the Polluter Pays principle and would make it easy and convenient for householders to avail of such a scheme, resulting in less WEEE ending up in the residual household waste stream, as well as potential litter and fly-tipped waste (all currently financed by local authorities). A UK wide electronics repair network could complement this and by only collecting goods which are beyond their useful life, this could help the shift towards a Circular Economy. If an item can be repaired and its life extended, then it should be only recycled when beyond its usefulness.

8. Recognising the need to balance frequency of service with efficiency, what frequency should a WEEE collection round be provided? Please select one of the following options: a. Weekly b. Fortnightly c. Monthly d. On demand

Answer: (d) On demand

9. Please provide any evidence you have to support your answer to question 8.

Within Belfast City Council, we currently operate an “On Demand” collection service for household bulky waste (free of charge): <https://www.belfastcity.gov.uk/bins/bulky-waste>
This collection system works well and ensures optimal operating capacity, particularly in terms of geographical coverage, labour, fuel and vehicle costs. This and other similar local authority collection models could be examined in more depth to determine potential opportunities for household WEEE collection rounds.

10. Would there be benefit in providing for different arrangements to apply in different areas according to circumstances, for example, on demand in some areas and regular collection round in others? Please provide any evidence you have to support your answer.

Potentially, “Yes.” There may be benefit to this provision, depending on individual services being available to different households and areas due to specific circumstances. (For example, housing type, density, size and accessibility for collection crews accounting for the different collection regimes involved). By 2026 Belfast City Council may have rolled out new services but it is difficult at this stage to state what the collection services might look like until we further explore potential requirements (e.g. demands and volumes.)

11. What should items qualifying for this service be defined by: a. Weight b. Dimension

Answer: Both (a) Weight and (b) Dimensions should be considered.

Waste recycling targets are currently weight driven but operationally speaking, product dimensions are particularly important to local authorities in designing their waste collection rounds, for example, how easily item can be handled and moved and how much space they take up in collection vehicles.

12. Please specify any products that, due to their properties, should be excluded from the small WEEE household collection service. Please provide evidence to support your answer

- Vapes and other WEEE containing lithium-ion batteries (e.g. laptops, tablets and mobile phones), due to the fire risks associated with these.

- WEEE with POPs unless control measures can be put into place to enable safe collection and prevent contamination.
- For any items with a screen or glass, that could give rise to health and safety concerns, precautions should be taken.
- Items containing potential food residue, such as cooking oil may also need consideration.
- Personal electrical items such as foot spas, items used in personal grooming and electrical medical aids may require particular collection arrangements (due to hygiene reasons) such as being wrapped by the householder before presentation.

13. For any products listed in response to question 12, what measures should be put in place to drive up levels of their separate collection to minimise disposal in residual waste?

A legislative ban on these items making their way into the residual waste stream in the first place.

There needs to be joined up communications with the Department of Health & other Government bodies, such as DEFRA, SEPA and DAERA to get across the need to correctly recycle these items. In addition, consideration should be given to legal requirements for producers and sellers to ensure that the batteries of such devices are easily accessible and therefore making it easier to follow recycling/disposal guidance.

14. Do you agree or disagree that producers (and distributors that do not provide their own take-back services) should finance collection of large WEEE? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

15. Please provide any evidence you have to support your answer to question 14.

We agree that producers should finance the collection of large WEEE. This approach would align with the producer pays principle and with the proposals of the packaging EPR scheme.

Currently BCC collects large WEEE from households as part of our free Bulky collection service: <https://www.belfastcity.gov.uk/bins/bulky-waste>.

The indicative estimated annual costs for BCC WEEE Bulky collection service are as follows

Labour costs = £48,148
 Fuel costs= £8,523
 Cost per vehicle = £56,671
 85% utilisation = £48,170
 R&M costs = £620
 Total cost per vehicle = £48,790

Total annual cost for 2 vehicles = £97,581

16. Do you agree or disagree that a producer-led Scheme Administrator, approved by government, is best placed to determine the most practical and efficient delivery mechanism to manage producer obligations to finance small and large WEEE collections from households? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer (c) Unsure

17. Please provide any evidence you have to support your answer to question 16.

There are probably advantages to be gained from a Producer led scheme but at the same time, an independently led SA might be fairer in terms of representing the interests of all stakeholders involved, including local authorities and those delivering on the ground collection services, as well as those financing the scheme.

The delivery mechanism could be guided by learning experience from existing EPR Scheme Administrators for other waste streams.

18. Do you agree or disagree that the most efficient and cost-effective delivery of the obligation to provide a regular household collection service for small WEEE and bulky 37 waste collections for large WEEE is likely to be achieved through partnerships between a Scheme Administrator and Local Authorities and their waste management partners? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer (c) Unsure

19. Please provide any evidence you have to support your answer to question 18.

It is difficult to make a business decision without available data and experience of waste collection Scheme Administrators. The most comparable existing system for us would be the current WEEE Producer Compliance Scheme. From Belfast City Council's perspective, this model has worked fairly well to date. However, it should be noted that with the proposed expansion of WEEE collection services, comes expansion of operational requirements, such as storage, vehicles, capacity and other resources well beyond "finances".

20. If you answered agree to question 16, what, if any, safeguards might be necessary to ensure costs incurred by producers in meeting the WEEE household collection obligation are reflective of the actual costs of delivery through their service partners?

Safeguards could include assurance measures for producers to ensure that they won't be overcharged. Similar safeguards to EPR/DRS, TEEP principles and checks & balances to be applied by the Scheme Administrator could be considered. Also "Waste Data Tracking" as well as auditing services and similar measures put in place at all stages of the supply chain.

Local authorities (/those providing the collection service) will need to have the opportunity to regular review operational costs through the Scheme Administrator.

21. Do you agree or disagree with the analysis of this proposal set out in the accompanying Impact Assessment? Please select one of the following options: a. Agree b. Disagree. c. Unsure

Answer: (b) Disagree

22. Please provide any evidence you have to support your answer to question 21.

The analysis within the IA assumes that Local Authority refuse collection vehicles and kerbside sort vehicles could accommodate or be retrofitted to accommodate small WEEE collections. However, this might not always be possible. Consideration also needs to be given to physical changes that might be required for Council operated Designated Collection

Points, Household Recycling Centres and Transfer Stations etc. and the regulatory processes, including changes to site licences and permits that would be involved.

23. Are there any other means of delivering a cost effective and efficient household collection service to that described in question 18, with alternative delivery partners to Local Authorities and if so, what might that look like?

Yes – to make it mandatory on retailers to take back or offer a collection service.

One suggested option could be to look at current household delivery services and apply reverse logistics on the drop-off systems deployed by such companies e.g. Amazon, Currys etc.

Also – Partnerships involving charities and social enterprises could be considered, perhaps taking the opportunity to focus on or seek to stimulate the market for refurbishment and repair more so than just recycling and recovery. Application of the circular economy model to stimulate job creation to ensure the life of the product is extended as long as is possible and minimising waste.

News article sample: "[New repair technicians to be trained to prevent electrical waste | BelfastTelegraph.co.uk](http://BelfastTelegraph.co.uk)"

24. Please provide any other comments and supporting evidence on the proposal for producers (and distributors that do not provide take-back services) to finance a system of kerbside collection of small WEEE and on-demand collections of large WEEE for households?

Creating such a scheme would be in line with the Polluter Pays principle. The estimated annual cost to Belfast City Council for the collection of large WEEE via the Bulky Waste Collection Service can be found in our answer to Q15.

25. Producers who place less than 5 tonnes of equipment on the UK market each year are exempt from financial obligations under the WEEE Regulations. Does that 5-tonne threshold remain appropriate? Please select one of the following options: a. Yes b. No c. Unsure

Answer (b) No

It would probably depend on the number of exempt producers overall and how much market share this makes up of the total market share. Such questions are based on weight and do not consider or reference dimensions of items.

26. If you answered no to question 25, what tonnage threshold is appropriate? Please provide evidence in support of an alternative threshold

1 tonne however, some thought might need to be given to the potential for unintended consequences of the scheme, regardless of the threshold.

27. Are there alternative, non-regulatory approaches that could be established to increase separate collection of WEEE from households for re-use and recycling? If so, please describe what this might look like.

It is unlikely that a non-regulatory approach would significantly impact WEEE collections.

There may be opportunities for reuse/refurbishment/repair but these would likely require support funding.

Promotion of re-use and repair should be prioritized which will prevent many items from being waste in the first instance. One difficulty is that larger items cannot be brought easily for appraisal for repair.

For repair and reuse schemes such as laptop reuse. If such items could come out of the scope of "waste" and into the realm of "Circular Economy", a more relaxed regulatory approach might be taken. If non-regulatory, what would the alternative to "licences" look like?

Reverse logistics could be applied as an investigatory model e.g. for supermarkets offering home deliveries.

Also, Charity partners e.g. for WEEE collection points in shops and home collection services could be considered.

Increasing distributor collections infrastructure

Q28 Do you agree or disagree that internet sellers and retailers should provide a free of charge "collection on delivery service", requiring the free takeback of large domestic appliances such as washing machines, dishwashers, fridges, freezers and TVs? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree - This proposal reduces the burden on councils and aligns with EPR and the polluter pays principle. However, consideration needs to be given to the whole value chain and whether this would incur additional resources.

Robust data records must be maintained and evidence of recycling recorded and tracked.

Q29 If you answered agree to question 28, should there be a reasonable time frame stipulated in which the unwanted item should be collected to allow for circumstances where it is not available for collection at time of delivery? Please select one of the following options: a. Yes b. No c. Unsure

Answer: (a) Yes

Q30 If you answered yes to question 29, what should those timeframes be? a. 2 days b. 5 days c. 10 days d. No there should not be a reasonable timeframe stipulated.

Answer:(c) 10 days assuming this refers to ten WORKING days.

Q31 If you answered agree to question 28, should this service be extended to collection of smaller items when a large item is collected? If so, should this be subject to reasonable limits in terms of how many items can be returned at once? Please select one of the following options: a. Yes b. No c. Unsure

Answer: (a) Yes - Again this proposal decreases the burden on councils and aligns with EPR and the polluter pays principle. However, consideration needs to be given to the whole value chain and whether this would incur additional resources. Robust data records must be maintained, and evidence of recycling recorded and tracked.

Q32 Should retailers selling new household appliances as part of a new kitchen also be obligated to take away the old appliances from the household free of charge? Please select one of the following options: a. Yes b. No c. Unsure

Answer: (a) Yes, as they are still electrical items.

Q33 Please provide any evidence you have to support your answer to question 32.

Kitchen retailers should have the same obligations as other retailers selling EEE. This aligns with the direction of travel of these new proposals and with the general EPR and Polluter Pays principles and definitions around Waste Electrical and Electronic Equipment.

Q34 Do you agree or disagree that we should extend the existing take-back requirements for large retailers from 1:1 to a 0:1 basis i.e. by removing the requirement to purchase an item for the take-back obligation to apply? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

From a council perspective, this reduces the burden on local authorities and offers assurance that the items are recycled.

Q35. If you answered 'agree' to question 34, do you agree or disagree that such an obligation should be subject to reasonable limits as to the quantities of WEEE returned per householder?

Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

However, the proposals should also be putting in place a mechanism for claw-back of excessive quantities.

Q36 Do you agree or disagree that the definition of "large retailer" should be any business with an annual turnover of electrical and electronic equipment of over £100k? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (c) Unsure

Q37 Please provide any evidence you have to support your answer to question 36.

A reasonable limit would mitigate the potential for commercial WEEE ending up in the household stream. The logistics for the bulking, storage and transportation of WEEE could likely be problematic for smaller retailers especially if the type of WEEE entered is not part of their normal trade.

Q38 If you answered 'disagree' to question 36, what should an alternative threshold be? Please provide evidence to support your answer.

N/A

Q39 Do you agree or disagree that the obligation be restricted to retailers only taking back items that are similar to those sold in their stores? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

There has to be a degree of reasonableness applied, particularly around product size, component parts and overall dimensions. For example, how would a large American-style fridge freezer compare with a vape?

Q40 Please provide any evidence you have to support your answer to question 39

It would be unreasonable to expect retailers selling specific types of WEEE to take back alternative types of WEEE. This could lead to a range of problems, including storage and other logistical issues.

Q41 Do you agree or disagree that an alternative obligation to 0:1 takeback be available to internet sellers such as payment into a scheme, similar to the current distributor takeback scheme, be used to support increased levels of collections for reuse and recycling? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

Q42 Please provide any evidence you have to support your answer to question 41.

We believe that the options are not exclusive and there is the potential for both systems to operate.

Q43 Do you agree or disagree that the current information requirements should be enhanced to ensure customers are provided with information about their recycling options 'at the point of sale'? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

Q44 Please provide any evidence you have to support your answer to question 43.

Enhanced information requirements (e.g. on the billing, invoicing, receipts and dockets) would potentially bring greater attention to the correct disposal method for the product. Provision of this information should be part of the sale process. It could be provided digitally as part of the receipt or physically as part of the transaction.

Q45 Do you agree or disagree that the point of producer responsibility should be moved to the retailer or internet seller's premises such as the retailer's store, bulking point, distribution point? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (c) Unsure

Q46 Please provide any evidence you have to support your answer to question 45.

It appears unclear to us if this means moving responsibility from the producers to the retailers. What roles and responsibilities do the manufacturer, producer and designers have? We need more clarity on what this question means.

Q47 Are there any other obligations we should place on retailers and/or internet sellers to increase levels of collections?

Website presence, branding, straplines, receipts etc. should all contain appropriate messages on product disposal and/or a QR code with details on how to dispose of that item at end-of-use point.

Q48 Please provide any evidence you have to support your answer to question 47.

As highlighted above, website presence, branding, straplines, receipts etc. should display messages on product disposal and/or a QR code with details on how to dispose of that item at end-of-use point.

Q49 Do you agree or disagree that Online Marketplaces and/or fulfilment houses should have 'take-back' obligations where they facilitate the supply of the product to the householder? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

Q50 Please provide any evidence you have to support your answer to question 49.

Online Marketplaces and/or fulfilment houses should have 'take-back' obligations, and fully contribute to the WEEE system.

Q51 How long will industry to adapt to the proposals set out above? Please select one of the following options: a. Up to 12 months b. 12 to 18 months c. 18 to 24 months d. 24 to 48 months

Answer: (d) 24 to 48 months

Q52: Please provide any evidence you have to support your answer to question 51.

The creation of the extensive reverse supply chains that would be necessary to support the proposals are onerous and will likely be time and resource intensive. An appropriate timeframe would be required in order to accommodate this.

New producer obligations for Online Marketplaces and Fulfilment Houses

Q53 Do you agree or disagree that Online Marketplaces should be required to fulfil the producer obligations on behalf of their overseas sellers? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

This is the environment sellers can sell in and customers can buy through so it should be responsible as the vehicle of transaction.

Q54 Please provide any evidence you have to support your answer to question 53

This is in line with the Polluters pay principle and since the online market places are the point of entry onto the market for WEEE produced elsewhere in the world it is logical that the cost is applied there.

Q55 Do you agree or disagree that fulfilment houses should be required to meet the producer obligations on behalf of their overseas sellers? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

Fulfilment houses are part of an enable the transaction so should form part of the obligations

Q56 Please provide any evidence you have to support your answer to question 55

Fulfilment houses are part of an enable the transaction so should form part of the obligations

Q57: Do you agree that Online Marketplaces/fulfilment houses should initially be able to use estimated weight data using a protocol agreed with the environmental regulators? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

Accurate data would be preferable; however, it is not clear how long this would take to collate or how accurate it would be.

Q58: If you answered agree to question 57, please provide evidence to explain why exact data cannot be provided.

Initially, estimated weight data could be used where not available. However, data on every product sold should be freely available in terms of actual weights already. Additional information, such as numbers and types of items could also be captured.

We would welcome more details on the proposed charging mechanisms involved.

Q59 What additional costs will accrue to online marketplaces and fulfilment houses as a result of becoming defined as a producer?

Reverse engineer shipping and disposal costs etc.

Q60 Please provide any evidence you have to support your answer to question 59.

As per above, reverse engineering could be applied as a mechanism to estimate potential costs.

Q61 at other ways, if any, should government explore to tackle the issue of noncompliance with the WEEE Regulations by online sellers?

Adequate resourcing of enforcement mechanisms in order to tackle noncompliance.

Q62 Please provide any evidence you have to support your answer to question 61.

N/A

Dealing with the environmental impacts of vaping products

Q63 Do you agree with the proposal to create a new category for vapes? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

Q64 What additional costs will accrue to producers, compliance schemes and regulators as a result of creating a new category for vapes? Please provide evidence to support your answer

Significant cost and risks associated with the collection of such items is currently borne by Local Authorities. This is out of line with the principle of Polluter Pays.

Also – Consideration would need to be given to administration costs incurred by PCSs to set up the new category and ensure that the necessary systems are in place and costs of regulating would be necessary.

Q65 Are there any other measures, beyond those for eco-modulation and littering set out in the call for evidence, you think government should take to curb the environmental impact of vapes? Please provide evidence to support your answer.

Accessibility of batteries (for ease of removal) on single use vapes. Safety information readily available for users and legislation on restriction of vapes – e.g. to under 18's in line with the recent proposed Smoke Free Generation bill

<https://healthmedia.blog.gov.uk/2024/01/30/creating-a-smokefree-generation-and-tackling-youth-vaping-what-you-need-to-know/>

System governance, the creation of a WEEE Scheme Administrator and performance indicators

Q66 Do you agree or disagree with the principle of establishing Government approved, producer-led Scheme Administrator to carry out specified functions in the reformed WEEE system? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: (a) Agree

Q67 Please provide any evidence you have to support your answer to question 66.

A four-nation approach to the creation of the Scheme Administrator is important. The DRS system hasn't taken this approach, with Scotland leading on a separate scheme which has led to a number of complications. <https://www.bbc.co.uk/news/uk-scotland-64624421>

The scheme administrator – whether it is producer led or not – needs to fully consider the whole value chain including the consequences to Local Authorities, who need to be able to input into the development and running of the scheme.

Q68 If you answered no to question 66, please set out details of an alternative approach to a Scheme Administrator

N/A

Q69 Which of the following functions do you think the Scheme Administrator should carry out?

a. managing the Producer Balancing system for household WEEE (and non-household if necessary)

b. administration of a Distributor Takeback Scheme (for use by those distributors who are not required under the new system to offer in store take-back)

- c. development and administration of a compliance fee methodology in consultation with all PCSs, for approval by Government
- d. providing evidence and forecasts of the likely household WEEE arisings – presenting recommendations to government to inform setting annual financial obligations placed on PCSs for household WEEE collections
- e. eco-modulation – support Government on potential new measures which could be applied to specific product categories, including development of a methodology upon which to base the modulation
- f. assess and report on environmental performance of the future system against key performance indicators with recommendations to Government on measures to improve that performance

Answer: “Yes” to all

Q70 Are there any additional functions the Scheme Administrator should carry out, in addition to those set out in question 69.

- A Communication Plan
- Examine how other similar systems work.
- We would welcome more details on what a “Producer Balancing System” is.

Q71 Please provide any other comments on the role of a Scheme Administrator.

We believe that the Scheme Administrator should take a four-nations approach. It needs to be independent and fully consider the whole value chain. It should be configured in a way to drive and ensure maximum WEEE recycling. A wide range of Stakeholders should be represented on the Board/governing body of any Scheme Administrator, including Local Authority representation.

Q72 Which of the alternative performance indicators listed in the section above do you agree or disagree should be included in the future system? a. Quantity or weight of WEEE in residual waste. b. Convenience of recycling. c. Volume of WEEE in fly-tipped waste in each of the nations. d. Level of consumer awareness of value and opportunities for reusing or recycling WEEE. e. Regular assessment of the carbon impact the UK WEEE system. f. Assessment of circular economy performance of the system. g. Improvements in the quality of WEEE treatment processes. h. Amount of WEEE diverted for reuse.

Answer: “Yes” to all

Q73 Are there any other measures of success which government should consider to assess the performance of the system?

Anything that requires to be counted will incur significant cost implications to local authorities. The process of measurement needs to be accounted for and covered in the payments to local authorities.

Examples could include:

- Quantity or weight of WEEE being recycled
- Overall arisings of WEEE
- Percentage of Households served by a kerbside/doorstep small WEEE collection service and Percentage of Households served by a kerbside/doorstep large WEEE collection service

Q74 Should information be collected to a level to support regional or local? Please select one of the following options: a. Yes b. No c. Unsure

Answer: (a) Yes

The collection of data at both local and regional level would be useful but would likely require sufficient finance.