

Belfast City Council draft response on the Call for evidence 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

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

N/A

Full net cost recovery

5. Considering the points for and against set out in the call for evidence, please select which of the following activities producers should finance the cost of: a) Residual waste b) Fly-tipped waste c) Littered waste

Answer: a, b and c

6. Please provide evidence of the volume (tonnes) of WEEE arising at UK level and/or by nation level in residual waste. N/A

N/A

7. Please provide evidence of the volume (tonnes) of WEEE arising the UK level/and or by nation that has been fly-tipped.

N/A

8. Please provide evidence of the volume (tonnes) arising at UK level and/or by nation that has been littered.

N/A

9. Please provide evidence of the net costs per tonne for collection of WEEE arising in residual waste.

N/A

10. Please provide evidence of the net costs per tonne for collection of WEEE that has been fly-tipped.

N/A

11. Please provide evidence of the net costs per tonne for collection of WEEE that has been littered.

N/A

12. Please provide evidence of the types of WEEE commonly discarded in the residual waste stream.

N/A

13. Please provide evidence of the types of WEEE commonly fly-tipped.

N/A

14. Please provide evidence of the types of WEEE commonly littered. 33 Allocation of costs for the collection and treatment of household WEEE

N/A

15. Do you agree or disagree that we should establish a rolling 3-year process for setting the financial obligations of producers to create more certainty in the system? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: c. Unsure

16. Please provide evidence of whether or not setting a rolling three-year forecast would provide more certainty in the system and act to encourage increased investment by the treatment sector.

N/A

17. Please provide evidence of whether or not a three-year forecast to set financial obligations be supported by a three-year minimum PCS-DCF contract duration in order to encourage increased investment by the treatment sector?

N/A

18. What are your views on the idea of establishing an allocation system as an alternative way to set financial obligations on producers and guaranteeing the financing of Local Authority collections?

Any alternative system should ensure that Local Authorities are appropriately financed.

19. Please provide evidence on the estimated costs and monetised benefits of both establishing and operating such a system.

Any scheme should take note of the costs and benefits of EPR and DRS schemes.

20. Please provide evidence of any other alternative approaches, not described in Chapter 2, which you think could be suitable for allocating financial obligations on producers. Prevention of waste and increasing re-use of unwanted electrical and electronic equipment

N/A

21. Do you agree or disagree that giving a higher weighting to tonnage collected by PCSs for re-use (or preparation for re-use) towards their collection targets, than tonnage collected for recycling would incentivise greater re-use (or preparation for reuse) of WEEE? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

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

Repair and refurbishment schemes for e.g. laptops and other mobile devices could incur more costs than getting the items recycled.

Under the current economic model it is often cheaper to mass manufacture new products in factories over repairing and reusing by individuals. From a Local Authority perspective currently PCS's contribute to the cost of Recycling but not to the cost of refurbishing and then reusing the same type of product. This acts as a disincentive to the generally more carbon friendly option of Repair and reuse.

There would need to be incentivised actions and Government schemes to make it economically viable – e.g. no VAT on repairs, alternative tax schemes such as Carbon Taxes to make it more expensive to buy new. This likely would encourage re-use more than recycling In line with the waste hierarchy and would contribute towards the development of the Circular Economy.

An example of such a repair/reuse scheme that could benefit from a change to the economic model would be the Belfast City Council Reuse it scheme.

<https://www.belfastcity.gov.uk/reuseit>

In addition incentives could be given to producers who design in repair/reuse and recycling for their products e.g <https://www.apple.com/uk/environment/>

23. Do you agree or disagree that we should introduce new targets for the re-use (or preparation for re-use) of WEEE that has been collected separately from other types of waste to incentivise more collections for re-use (or preparation for re-use)? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

24. Please provide any evidence you have to support your answer to question 23.

We agree that there should be targets but there is a need to recognise the cost implications associated and ensure they are met.

25. If you answered agree to question 23, please provide evidence to indicate on which of the stakeholder groups below targets should be placed to maximise impact? Please select one of the following options: a. Producers (via PCSs) b. Retailers c. Local authorities d. Both retailers and Local Authorities e. Unsure

Answer: e. Unsure

26. Please provide any evidence you have to support your answer to question 25.

N/A

27. Do you agree or disagree that an obligation on PCSs to provide free collection services to re-use charities and the charity retail sector for donated equipment subsequently deemed unsuitable for re-use would promote greater re-use by removing a significant cost barrier to the sector? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

28. Please provide any evidence you have to support your answer to question 27.

N/A

29. Do you agree or disagree that access to data from retailers and Local Authorities on how much used equipment is received at these collection facilities for re-use (and consequentially diverted away from entering the WEEE producer responsibility system) would provide significant and useful new insight into volumes of equipment being re-used that is not classified as waste? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

30. Please provide any evidence you may have to support your answer to question 29.

N/A

31. Please provide evidence (including from international sources) of other potential mechanisms to increase levels of re-use and preparation for reuse activities across a broad range of products.

N/A

Moving to a circular economy through the design of better products and business models

32. Do you agree or disagree that implementing a system of eco-modulation into the UK's WEEE system could incentivise more sustainable product design? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

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

N/A

34. If you agree with question 32, which of the following approaches would you most likely support: a. A new system of EPR in which variable fees, based on units placed on the market (POM), are modulated through the implementation of a malus (increased fee) or bonus (reduced fee). b. Maintain the current system of setting obligations based on a market share (by weight) approach but with that market-share modulated to reward producers whose products have the lowest environmental impact, thereby reducing their compliance costs compared to those producing more harmful products. c. Either of the above approaches

Option B is more in parallel with EPR and the Producer Pays Principles and therefore likely have the most beneficial environmental impact.

35. Which of the following metrics should we use to prioritise products to eco-modulate? Please select one of the following options: a. Total weight of the product (in tonnes). b. Total volume (in units) sold on the UK market. c. Carbon intensity of the product.

Answer: c. Carbon intensity of the product.

36. Which of the following criteria should be used as an effective basis for eco-modulation: a. Recycled content b. Recyclability c. Reparability d. Durability e. Energy efficiency f. Hazardous substances

All should be criteria

37. Are there any other criteria, other than those set out in question 36, which you feel would be relevant? Please specify what these could be.

The lifecycle analysis and carbon footprint of the production/ruse/recycling process.

38. How should compliance with eco-modulation criteria be verified in a way that balances cost with the integrity of the system? Please select one of the following options: a. Self-declaration b. Third party declaration c. In advance control or inspection by the authorities d. Other (please specify)

Answer: c. In advance control or inspection by the authorities

39. Do you agree or disagree that eco-modulation should be supported by mandatory labelling to give consumers visibility of the extent to which the product has met certain eco-design criteria? Please select one of the following options: a) Agree b) Disagree c) Unsure

Answer: a. Agree

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

A clear labelling system with relevant information would likely have a positive impact when consumers deciding to purchase products. This may incentivise options with better environmental outcomes with producers being further incentivised to design products with more desirable properties and may even become a competitive advantage for those that succeed in doing so.

Similar to A-G Energy labelling on appliances <https://energysavingtrust.org.uk/advice/home-appliances> or even Buildings Energy Certificates <https://www.nidirect.gov.uk/articles/energy-performance-certificates>

41. If you answered 'agree' to question 39, in which format do you think this information should be displayed? Please select one of the following options: a) QR Code (or other electronic tag) b) Physical label c) Alternative format (please specify)

Answer: b. Physical label

42. Do you agree or disagree that products made available on the market using circular economy business models should be excluded from the calculation of collection and treatment obligations placed on producers because they will in any case be responsible for the individual product when it becomes waste? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: B. disagree

43. Please provide any evidence you have to support your answer to question 42.

It should be structured as a bonus rather than a malus. Local authorities still have collection costs incurred and this should not be discounted from the calculations.

Increasing collections of business WEEE

44. Do you agree or disagree that the current business to business (B2B) system (EEE or WEEE that is designed for business, industry or professional use only, rather than household use) is an effective mechanism by which end users can return WEEE to producers for proper treatment? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: c. Unsure

45. Please any evidence you have to support your answer to question 44.

Some commercial WEEE, for example fridge and freezer units still make their way into the Designated Collection Facility at Belfast City Council's Waste Transfer Station often through being fly tipped.

46. Do you agree or disagree that we should extend the principle of producer responsibility to the premises of the business end user (and other non-household premises) and introduce a collective producer responsibility system for Business to Business (B2B) WEEE? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

47. Please provide any evidence you have to support your answer to question 46.

This seems logical as long as all designated parties within the supply chain have paid what is due.

48. Are there circumstances (for example, for certain product types) in which individual producers should be responsible for the cost of collection and treatment of the products they place on the market when they become waste? Please select one of the following options: a. Yes b. No c. Unsure

Answer: a. Yes

49. If you answered yes to question 48, please set out what these product types might be.

One such product would be single use vapes.

50. Do you agree that a system in which producers financed the cost of collection from the business end user and adequately supported by appropriate communications would be sufficient to drive increased levels of business WEEE into the system? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: c. Unsure

51. Please provide any evidence you have to support your answer to question 50.

N/A

52. Are there any circumstances in which it might not be appropriate for producers to finance collections from businesses? Please select one of the following options: a. Yes b. No c. Unsure

Answer: a. Yes

53. If you answered yes to question 52, please say circumstances these may be. Please provide any evidence you have to support your answer.

N/A

54. Do you agree or disagree that there should be a ban on producers and distributors sending whole items of electrical equipment (such as surplus stock) to landfill or incineration? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

55. Please provide any evidence you have to support your answer to question 54.

This is in line with the Waste Hierarchy and the polluter pays principle.

56. If a ban were to be implemented, do you foresee any unintended consequences of unwanted electrical stock being redirected to any of the following routes? Please select one of the following options: o Reselling o Repair / refurbishment o Re-use or Recycling

Reuse or Recycling

57. Please provide any evidence you have to support your answer to question 56.

Businesses likely to choose the cheapest option which may result in items being recycled rather than repaired etc. As discussed (in Q22 Answer) careful consideration needs to be given to the economics of these systems so that environmentally beneficial options are incentivised.

58. What are your views on alternative policies to improve the B2B system? Please provide any evidence you have to support your answer.

N/A

Improving treatment standards

59. Do you agree or disagree that the recovery and recycling rates for WEEE should be reviewed to ensure that those targets remain sufficiently challenging whilst achievable? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

60. Please provide details of evidence sources used to support your answer and evidence on the extent current targets are being met and exceeded.

Rates should be reviewed and remained under review to account for all factors in the external environment and new products (ie vapes were not common place 10 years ago)

61. Do you agree or disagree that AATFs should be required to report annually on the extent to which they have met those recycling and recovery targets and that their report should be supported by an independent audit? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

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

N/A

63. Please provide evidence of likely costs of both reporting and independently auditing recycling and recovery rates.

N/A

64. Do you agree or disagree that the introduction of individual recovery targets for specific materials, including critical minerals would drive recovery of and demand for those materials thereby contributing to Net Zero and Circular Economy ambitions whilst supporting security of supply of certain materials? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

65. Please provide any evidence you have to support your answer to question 64.

N/A

66. If you agree with question 64: would you support the introduction of reporting on specified materials to form a useful evidence base ahead of setting targets in the future? Please select one of the following options: a. Agree b. Disagree c. Unsure

Answer: a. Agree

67. If you answered agree to question 66, should these targets be mandatory or nonbinding? a. Mandatory b. Non-binding

Answer: a. Mandatory

68. We require treatment facilities to demonstrate sound management of WEEE, including removal of specified hazardous material and POPs. Are there any other substances and components which should be added to the restricted list? Please provide evidence to support your answer.

We would support vapes having own category of WEEE for effective measurement and management.

69. What do you think are the key barriers to improving material recovery when treating WEEE? Please select one of the following options: a. Information barrier b. Technological barrier c. Other

Answer: b. Technological barrier

70. If you answered 'other' to question 69, please specify what this would be.

N/A

71. What information do you think suppliers of products should be required to provide to assist waste treatment operators to increase the recovery of specific materials or components commonly found in WEEE?

Product passport listing all materials and quantities used as well as information on techniques/technology on their repair, reuse, recycling and materials recovery.