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Democratic Services Section
Legal and Civic Services Department
Belfast City Council
City Hall
Belfast
BT1 5GS

11th March, 2024

MEETING OF THE PEOPLE AND COMMUNITIES COMMITTEE

Dear Alderman/Councillor,

The above-named Committee will meet in the Lavery Room - City Hall on Tuesday, 12th March, 2024 at 5.15 pm, for the transaction of the business noted below.

You are requested to attend.

Yours faithfully,

John Walsh

Chief Executive

AGENDA:

1. **Routine Matters**

   (a) Apologies

   (b) Minutes

   (c) Declarations of Interest

2. **Restricted**

   (a) Quarter 3 Finance Update (Pages 1 - 8)

   (b) Strategic Cemeteries and Crematorium Working Group Update (Pages 9 - 16)

3. **Committee/Strategic Issues**

   (a) Pitch Partner Agreements (Pages 17 - 20)

   (b) Community Support Programme 2024/25 (Pages 21 - 32)

   (c) Boxing Strategy Update (Pages 33 - 48)

(d) Partnership Funding (Pages 49 - 52)

(e) Consultation and Engagement Framework for Large Events (Pages 53 - 56)

(f) Response to TEO consultation on Victims and Survivors (Pages 57 - 64)

(g) Funding for Independently Managed Community Centres (Pages 65 - 68)

(h) Consultation Response - Reforming Producer Responsibility for Waste Electrical and Electronic Equipment 2023 (Pages 69 - 294)

4. **Operational Issues**

(a) Requests for Events in Parks (Pages 295 - 300)

(b) Shankill Juniors / Woodvale MUGA (Pages 301 - 302)

(c) Blanchflower Stadium - Preferential Use Agreement (Pages 303 - 308)

(d) Upper Ardoyne Youth Club - Expression of Interest (Pages 309 - 312)

(e) Request from Probation Board NI - Annadale Allotments (Pages 313 - 326)

(f) Donations to societies for contributions to Spring and Autumn Fairs (Pages 327 - 328)

(g) Request to Facilitate ongoing Greylag Goose control at Victoria Park (Pages 329 - 338)

(h) Proposal for Dual Language Street Signage (Pages 339 - 342)

(i) Naming of New Streets in the City (Pages 343 - 346)

5. **Issues Raised in Advance by Members**

(a) XL Bully Restrictions announced by DAERA Minister - Councillor Flynn

(b) Request to invite South Belfast Youth League representative to present at a future meeting - Councillor R. Brooks

(c) Request for Lagan Valley Regional Park and HED to be invited to address the Committee regarding Giants Ring - Councillor Murray

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Belfast City Council

PEOPLE AND COMMUNITIES COMMITTEE

Subject:	Pitch Partner Agreements Update
Date:	12th March 2024
Reporting Officer:	David Sales - Strategic Director of City and Neighbourhood Services
Contact Officer:	Cormac McCann - Lead Officer, Community Provision

Restricted Reports				
Is this report restricted?	**Yes**		**No**	X
If Yes, when will the report become unrestricted?				
After Committee Decision				
After Council Decision				
Some time in the future				
Never				

Call-in				
Is the decision eligible for Call-in?	**Yes**	X	**No**	

1.0	**Purpose of Report or Summary of main Issues**
1.1	This report is to provide an update on progress on implementation of Partner Agreements for October 2023-December 2023.
1.2	To recommend extension of partner agreements from 1 April 2024 through until 31 March 2025 or until new arrangements are put in place following completion of the Community Asset Transfer Pilot.
2.0	**Recommendations**
2.1	The Members of the Committee are asked to note the progress to date at partner agreement sites.
2.2	That partner agreements are extended until 31 March 2025 or until new arrangements are put in place following completion of the Community Asset Transfer Pilot.

3.0	Main report

Legal Agreements

3.1 Council agreed to enter into Partner Agreements at the following sites with the clubs identified below. The Agreements are for a period of 5 years with option to extend for up to a further two years. The Department has extended all of the Agreements beyond the initial 5 year period and up to 31 March 2023.

Agreement Extension

3.2 On 7 March 2023 The Committee was asked to note that, under the Scheme of Delegation, the Director had extended the current Partner agreements for all the sites until 31 March 2024.

3.3 Council is currently developing a new policy regarding the management of assets within the community with a pilot being delivered across a number of sites. One of the sites included in the initial pilot is Ulidia Playing Fields and this site has been assessed using the pilot approach. At their meeting in October, Strategic Policy and Resources committee endorsed this committee's recommendation to transfer the existing Partner Agreement at Ulidia to a long term lease. It is anticipated that, following review of the CAT pilot process, a number of the sites listed below may also be made available for consideration under new management arrangements.

3.4 Until that time, and to ensure continuity of service provision, it is proposed that the existing Partner Agreements continue until the new arrangements are put in place.

Location	Partner
Dixon Playing Fields	Sirocco Works FC
Alderman Tommy Patton Memorial Park	East Belfast FC
Woodlands Playing Fields	Co. Antrim Board GAA
Loughside Playing Fields	Loughside FC
Shore Road Playing Fields	Grove United FC
Orangefield Playing Fields	Bloomfield FC
Ulidia Playing Fields	Rosario FC

3.5 Regular checks on the necessary Insurance, Health and Safety and Governance have been completed at all sites. The reporting documents were amended in accordance with audit requirements and sent to partners one month in advance of reporting deadlines.
All partners are compliant on these matters.

3.6 All existing agreements will terminate on or shortly after the 31 March 2024.

Financial Support to deliver Sports Development Plans

3.7 Successful partners submitted their plans in early 2023 to improve sports development outcomes at each site in the 2023 – 2024 financial year. Funding of up to £20,000 per annum has been available for each partner to deliver a programme supporting their Sports Development Plan. Letters of offer to all partners are based on approved sports development plans for the financial year. Partners must submit Sports Development plans annually which are aligned to the financial planning calendar for the incoming year.

Monitoring

3.8 Quarterly monitoring meetings with our delivery partners continue to take place. These meetings include updates on site management and bookings, health and safety, finance and their sports development plan. Action plans are reviewed and agreed with the partners during

these discussions to ensure that planned outcomes are achieved and improvements identified where required.

Sports Development Impact

3.9 In line with Council objectives, the diversification of use and improved sports development impact are priorities at the partner agreement sites. Programme delivery continues to achieve positive achievements across the sites.

3.10 The table below indicates outputs at the sites as reported by the 7 partners for Quarter 3 (October-December) 2023.

A. Participation type	
1. Members of different codes	2770
2. People with a Disability	106
3. People from a minority ethnic background	1685
4. Females	2022
5. Older people	1289
6. Schools / youth organisations	6
B. Participation usage	
Number of full pitch/adult matches on site	188
Number of full pitch/adult match participations	5103
Number of small sided/youth matches on site	197
Number of youth match participations	7602
Number of training sessions held on site	263
Number of training session participants	7530
Number of other bookings / activities on site	55
Number of other bookings/activity participants on site	1850
C. Partnership working	
1. Working with Belfast City Council	8
2. Sport's Governing Bodies	13
3. Other teams / groups in your sport	9
4. Other teams / groups in different sports	3
5. Community / voluntary groups	6
D. Social value	
1. Young people at risk	231
2.Encourage participation of under- represented groups	219
3. Promote positive cross community relations	215
4. Promote health and wellbeing in socially deprived communities	1820
5. Promote Volunteering skills	70
6. Develop skills that will improve employability	20

3.8 **<u>Financial & Resource Implications</u>**

A total of £140,000 per annum is available within revenue estimates to support annual Sports Development Plans at the Partner Agreement sites.

3.9 **<u>Equality or Good Relations Implications</u>**

None.

4.0 Appendices – Documents Attached

	None

Belfast City Council

PEOPLE AND COMMUNITIES COMMITTEE

FUNDING AWARDS FOR 24/25 (CAPACITY BUILDING & REVENUE GRANTS AND GENERALIST ADVICE)

Subject:	Funding Awards for 24/25 (Capacity Building & Revenue Grants and Generalist Advice)
Date:	12 March 2024
Reporting Officer:	David Sales, Strategic Director of City and Neighbourhood Services
Contact Officer:	Nicola Lane, Neighbourhood Services Manager Margaret Higgins, Lead Officer, Community Provision

Restricted Reports

Is this report restricted? **Yes** [ ] **No** [x]

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number [ ]

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	[ ]
After Council Decision	[ ]
Sometime in the future	[ ]
Never	[ ]

Call-in

Is the decision eligible for Call-in? **Yes** [x] **No** [ ]

1.0	**Purpose of Report/Summary of Main Issues**
1.1	The main purpose of this report is to: • Advise members that the Community Support Programme (CSP) Letter of Offer for 24/25 has not yet been received by Council from DfC. • Seek members approval to issue Letters of Offer for 24/25 for Capacity Building & Revenue Grants and Generalist Advice in the absence of a Letter of Offer from DfC.
2.0	**Recommendation**
2.1	Members are asked to; • Consider the contents of the report and • Grant approval for officers to progress funding agreements for the Capacity Building, Revenue for Community Building grants and Generalist Advice for the period 1 April 2024 to 31 March 2025. 50% payments will be issued in advance upon the return of required paperwork with a second payment made pending return of satisfactory interim monitoring report covering the period 1 April to 30 September 2024 and available budget. • Note that Council does not have any budget to support activity that is 100% funded through the CSP and that none of this activity will progress until funding becomes available through the CSP. A further report on this element will be provided at a later date.
3.0	**Main Report**
	Background information
3.1	Members will be aware that the Department for Communities (DfC) provides an annual grant to Council through its Community Support Programme (CSP) Letter of Offer. This funding provides an element of the budget towards Capacity Building and Revenue for Community Building grants as well as Generalist Advice. The CSP also provides 100% funding for other elements of activity such as Social Supermarkets and Welfare Reform Mitigations.
3.2	Council has yet to receive a CSP Letter of Offer for 2024/25 and therefore does not have the total budget available to provide the full grant allocation. Any reduction in the DfC allocation will impact on the overall level of the grant budget and potentially awards to the grant recipients. The CSP Letter of Offer is generally received in March - June each year, although members may recall that in 23/24, DfC funding was released on a gradual basis and the full allocation was not provided until 7 July.
3.3	**Key Issues** <u>Capacity Building and Revenue for Community Buildings Grants</u> Members may be aware that in March 2023, Council agreed to provide multi-annual funding covering 3 years 2023-2026 for the Capacity Building and Revenue for Community Building grants. Although the grants are multiannual, Funding Agreements are made on an annual basis. Officers are seeking approval to make payments covering 1 April 2024 to 31 March 2025.

The total cost of the grants allocation for 2024/25 is £3,278,109

- Capacity Building £1,845,311
- Revenue for Community Buildings £1,432,798

3.4 The list of organisations that receive funding is outlined in appendices 1 and 2.

Council's contribution to Capacity & Revenue Grant Programmes is 78% of the overall budget thus we can guarantee the first 50% payment.

3.5 Generalist Advice Funding

Members will be aware that Council provides funding for generalist advice provision to 5 Advice Consortia covering: Central, East, North, South and West Belfast. The funding is allocated to the consortia using a funding model based on population and multiple deprivation indicators (2015). The list of advice organisations and consortium funding allocation is contained in Appendix 3.

3.6 Members will recall that they received a presentation and a copy of the report on the recent Review of Belfast City Council funded Advice Services. Officers are currently working with the advice consortia on implementing the report recommendations. A further report will be presented to committee on progress in due course.

3.7 The Belfast Advice Group (BAG), the umbrella structure for the 5 advice consortia, made a presentation to committee in February seeking an 3% increase to the funding allocation. Committee agreed to progress the request for consideration by SP&R. Any decisions on additional allocations will be reflected in the award to each consortia and payments will be made in line with normal administration arrangements.

3.8 Council's contribution to Generalist Advice is 39% of the total allocation. Members are asked to consider if they are content to approve the issue of Letters of Offer and 50% payment.

3.9 A further report will be presented to committee when we receive the Community Support Programme Letter of Offer from DfC. Members are asked to note that Council does not have any budget to support activity that is 100% funded through the CSP and that none of this activity will progress until funding becomes available through the CSP.

3.10 **Financial and Resource Implications**

Members may wish to note that last year the allocation was as below. The council budget is the same for 24/25;

Grant	CSP funding (DfC)	BCC contribution	Total
Capacity	£436,028	£1,409,283	£1,845,311
Revenue	£298,329	£1,134,469	£1,432,798
Advice	£607,928	£391,729	£999,657
Total	£1,342,285	£2,935,481	£4,277,766

3.11	Members will note that Council has the available budget to make a 50% payment to recipients of all three elements (Capacity, Revenue and Advice), however, should there be a reduction in DfC funding this would impact on the overall budget available to cover costs.
3.12	In light of this, Funding Agreements for 2024/25 Capacity Building and Revenue for Community Buildings Grants and Generalist Advice will contain a condition that the second payment may vary due to the level of funding received from DfC.
	Equality or Good Relations Implications/Rural Needs Assessment
3.13	Any reduction in the available budget has the potential to impact on service delivery which may have equality, good relations or rural needs implications for Belfast City Council.
4.0	**Appendices - Documents Attached**
4.1	Appendix 1 – Capacity Building Grant Allocation 2024/25 Appendix 2- Revenue for Community Building Grant Allocation 2024/25 Appendix 3 - Advice Funding Allocation 2024/25

Appendix 1
Capacity Grant Allocations 2024/25

	Organisation	Grant Allocation
1.	Boys & Girls Clubs	£49,247.00
2.	Engage With Age	£30,514.00
3.	Cara-Friend	£50,000.00
4.	Charter NI	£44,509.00
5.	Roden Street Community Development Group	£50,000.00
6.	Southcity Resource And Development Centre.	£50,000.00
7.	The West Belfast Partnership Board	£49,600.00
8.	Poleglass Community Association @ Sally Gardens	£48,470.00
9.	Conradh Na Gaeilge	£50,000.00
10.	Short Strand Community Forum	£50,000.00
11.	Women's Resource And Development Agency	£50,000.00
12.	Ballynafeigh Community Development Association	£50,000.00
13.	Falls Community Council	£50,000.00
14.	Falls Partnership Initiative	£40,000.00
15.	Ligoniel Improvement Association	£41,746.64
16.	Colin Neighbourhood Partnership	£35,397.54
17.	The HUBB Community Development Resource Centre	£29,000.00
18.	Fóram na nÓg	£43,954.72
19.	Lower Ormeau Residents Action Group (LORAG)	£50,000.00
20.	Upper Springfield Resource Centre	£37,932.76
21.	Cliftonville Community Regeneration Forum	£45,189.34

22.	Volunteer Now	£48,191.28
23.	Ashton Community Trust	£50,000.00
24.	Market Development Association	£31,100.00
25.	Training for Women Network	£45,815.00
26.	East Belfast Community Development Agency	£50,000.00
27.	Whiterock Children's Centre/Whiterock Creche Association	£20,750.00
28.	Belfast Interface Project. (BIP)	£49,791.00
29.	Horn Of Africa People's Aid Northern Ireland (HAPANI)	£50,000.00
30.	University Of Atypical For Arts And Disability	£50,000.00
31.	Small Steps	£49,835.59
32.	lenadoon community forum	£33,448.00
33.	Sailortown Regeneration Group	£50,000.00
34.	All Nations Ministries	£48,302.00
35.	Northern Ireland Youth Forum	£19,900.00
36.	Ardoyne Youth Enterprises	£21,912.00
37.	Belfast Unemployed Resource Centre	£46,646.00
38.	GREATER SHANKILL COMMUNITY COUNCIL	£50,000.00
39.	St James Forum	£46,000.00
40.	South Belfast Partnership Board	£31,459.42
41.	Taughmonagh Community Forum Ltd	£49,400.00
42.	Loughview Community Action Partnership (LCAP)	£9,700.00
43.	TechDesk CIC	£47,500
		£1,845,311.29

Appendix 2
Revenue for Community Buildings Grant Allocations 2024/25

	Organisation	Grant Allocation
1.	Newstart Education Centre	£20,000.00
2.	Ardmonagh Family & Community Group	£13,000.00
3.	Lagmore Community Forum	£20,000.00
4.	Holy Trinity Centre	£20,000.00
5.	Cancer Lifeline	£20,000.00
6.	Cultúrlann McAdam Ó Fiaich	£20,000.00
7.	Mornington Community Project	£14,435.00
8.	Ionad Uíbh Eachach	£20,000.00
9.	Cumann Cultúrtha Mhic Reachtain	£20,000.00
10.	FORTHSPRING INTER COMMUNITY GROUP	£20,000.00
11.	An Droichead	£20,000.00
12.	Divis Joint Development Committee	£20,000.00
13.	Glen Community Parent Youth Group	£20,000.00
14.	Feile An Phobail	£18,000.00
15.	Hannahstown Community Association	£20,000.00
16.	Chinese Welfare Association NI	£20,000.00
17.	EastSide Partnership	£18,880.00
18.	Footprints Womens Centre	£20,000.00
19.	Falls Women's Centre	£20,000.00
20.	Solas	£20,000.00
21.	Suicide Awareness & Support Group	£19,606.00
22.	Spectrum Centre	£20,000.00

23.	Brassneck Youth	£15,714.00
24.	Belfast South Community Resources	£20,000.00
25.	Manor Street Cliftonville Community Group	£13,000.00
26.	NBWISP (North Belfast Womens' Initiative & Support Project)	£15,212.00
27.	Oasis Caring In Action Ltd	£18,500.00
28.	Upper Andersonstown Community Forum	£20,000.00
29.	BLACKIE RIVER COMMUNITY GROUPS	£20,000.00
30.	Grace Women's Development Limited	£16,176.96
31.	Windsor Women's Centre	£20,000.00
32.	Glór na Móna	£20,000.00
33.	Lagan Village Youth And Community Group	£20,000.00
34.	Shankill Women's Centre	£13,000.00
35.	Ballymac Friendship Trust	£20,000.00
36.	City Life Projects	£20,000.00
37.	SCOIL NA FUISEOIGE	£20,000.00
38.	Upper Springfield Development Trust: Newhill Youth & Community Centre	£20,000.00
39.	TAR ISTEACH	£19,327.00
40.	Belvoir Community Hub	£20,000.00
41.	MOUNT EAGLES COMMUNITY ASSOCIATION	£15,550.00
42.	The Vine Centre	£20,000.00
43.	Wandsworth Community Association	£20,000.00
44.	PIPS Suicide Prevention Ireland	£20,000.00
45.	Arts For All	£20,000.00

46.	GEMS Northern Ireland Limited	£18,500.00
47.	Greenway Women's Group	£20,000.00
48.	Tar Anall	£10,950.00
49.	Kids Together Belfast	£20,000.00
50.	St Comgalls	£20,000.00
51.	Benview community Centre	£19,994.00
52.	Willowfield Parish Community Association	£20,000.00
53.	Walkway Community Association	£20,000.00
54.	Belfast Activity Centre	£20,000.00
55.	WOMEN'STEC	£9,000.00
56.	Conway Youth Centre	£10,900.00
57.	The Parent Rooms	£20,000.00
58.	Bloomfield Community Association	£17,367.61
59.	Glenbank Community Association	£13,500.00
60.	Star Neighbourhood Centre	£16,200.00
61.	Greater Turf Lodge Residents' Association	£6,263.84
62.	Belvoir Players Amateur Dramatic Society	£20,000.00
63.	Falls Residents Associations	£7,726.60
64.	Lower Oldpark Community Association	£14,645.21
65.	York Road Civil Defence Management Committee	£17,300.00
66.	Ardoyne Association	£20,000.00
67.	Marrowbone Community Association	£20,000.00
68.	African And Caribbean Support Organisation Northern Ireland (Acsoni)	£15,100.00

69.	Annadale & Haywood Resident Association	£13,446.40
70.	Concerned Residents Of Upper Ardoyne (CRUA)	£5,850.00
71.	Cumann Chluain Árd	£20,000.00
72.	Donegall Pass Community Forum	£19,908.43
73.	Raidió Fáilte Teo	£19,866.00
74.	Ballysillan Community Forum	£16,300.00
75.	MIDLAND SOCIAL & RECREATIONAL ASSOCIATION	£12,400.00
76.	Small Wonders Childcare	£20,000.00
77.	GLENCAIRN RESIDENTS GROUP	£7,000.00
78.	LIGONIEL FAMILY CENTRE	£8,080.00
79.	Glencolin Residents Association	£6,119.00
80.	Indian Community Centre (Belfast) Ltd	£20,000.00
81.	Greater Village Regeneration Trust - TREE Project	£17,980.00
82.	TAGIT T/A Tullycarnet Boxing Club	£3,000.00
83.	Lower Shankill Community Association	£3,000.00
84.	Sunningdale Community Cente	£3,000.00
85.	Tackling Awareness Of Mental Health Issues (TAMHI)	£3,000.00
86.	Springfield Charitable Association Ltd	£3,000.00
87.	Whiterock Westrock Residents Association	£3,000.00
		£1,432,798.05

Appendix 3
Advice Funding Allocation 24/25

Consortium and Members	**Total**
North Belfast	**£ 258,723.74**
The Vine Centre (Lead)	
Ardoyne Association	
Ballysillan Community Forum	
Ligoniel Improvement Association	
Tar Isteach	
North Belfast Advice Space	
West Belfast	**£ 353,931.96**
Falls Community Council (Lead)	
Upper Springfield Development Trust	
Neighbourhood Development Association	
Springfield Charitable Association	
Suffolk & Andersonstown Advice Space	
Falls Advice Space	
Shankill Advice Space	
Central Belfast	**£ 88,603.68**
Advice Space (Lead)	
Belfast Unemployed Resource Centre	
East Belfast	**£ 144,397.06**
Advice Space (Lead)	
EBIAC	
South Belfast	**£ 154,000.56**
BCDA	
Southcity Resources and Development	
Advice Space	
Total	**£ 999,657.00**

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Belfast City Council

PEOPLE AND COMMUNITIES COMMITTEE

Subject	Belfast Boxing Strategy 2023-2024 Quarter 3 Update and extension of programme for 2024-2025
Date	12 March 2024
Reporting officer	David Sales – Strategic Director of City and Neighbourhood Services
Contact officer	Cormac McCann – Lead Officer, Community Provision

Restricted Reports				
Is this report restricted?	**Yes**		**No**	X
If Yes, when will the report become unrestricted?				
After Committee Decision				
After Council Decision				
Some time in the future				
Never				

Call-in				
Is the decision eligible for Call-in?	**Yes**	X	**No**	

1.0	**Purpose of Report or Summary of main Issues**
1.1	The purpose of this report is to provide an update on progress on implementation of the Belfast Boxing Strategy for the period up to the end of December 2023 (Quarter 3) and to seek committee approval to extend the Belfast Boxing Strategy and delivery of the related programme for a further year to 31st March 2025 pending the production of the new Physical Activity and Sports Development Strategy for Belfast.
2.0	**Recommendations**
2.1	The Members of the Committee are asked:

	i. to note the progress to date of the strategy annual work plan for the current year 2023/24. ii. To extend the Belfast Boxing Strategy and delivery of the attached Work Programme for 1 year from 1st April 2024 to 31st March 2025 pending the production of the new Physical Activity and Sports Development Strategy for Belfast
3.0	**Main report**
3.1	Background Council agreed, through the January 2018 Strategic Policy and Resources Committee, to provide £200,000 to the Irish Athletic Boxing Association Ulster Branch (IABA) for delivery of an agreed annual action plan supporting the Belfast Boxing Strategy. The current strategy is scheduled to finish on 31st March 2024
3.2	The IABA provided SP&R with a detailed breakdown of programmes to be delivered under six main areas. Salary – Development Officer and Coaches, Pathways, Events, Coach Education, Club Support and Governance.
3.3	Following this decision, the Belfast Boxing Strategy Steering Group has met quarterly with the most recent meeting taking place via MS Teams on 25 January 2024. The Steering Group is chaired by the Neighbourhood Services Manager with Council officers, IABA officers and officials and County Antrim Board officials attending. Small variations to the budget across the six areas have been agreed to assist prioritisation in line with the agreed annual action plan and the programme is on schedule to deliver all KPIs within budget.
3.4	Monitoring The Leisure Development Unit works directly with IABA officials to verify reporting on performance, vouching actual spend and provides detailed reports for discussion at the Steering Group.
3.5	Performance Council agreed a total of 37 Indicators with IABA to monitor delivery of the programmes. IABA have complied with reporting requirements and their performance report for 23/24 Quarter 3 is at Appendix 1. IABA have provided narrative against each of the KPIs to describe progress against each indicator and have advised that they anticipate that all KPIs will be achieved by the end of 23/24

	24/25 Action Plan
3.6	Pending the development of council's Physical Activity and Sports Development Strategy. the IABA has asked that committee extend the current strategy and related level of annual support for a further 12 month period. In support of the request, they have developed a new programme action plan relating for 2024/25. The plan is attached at Appendix 2
	Financial & Resource Implications
3.7	A total of £200,000 is available within the current financial year to support the current Action Plan. It is likely that the full budget will be expended. A total of £200,000 has been included within the budget estimates for 2024-2025.
	Equality Impact/Rural Needs Assessment
3.8	The strategy was equality screened in line with the Council's equality process. The screening showed that there were potential adverse impacts on a number of groups including females and people with a disability and mitigating actions were added to the strategy. Members agreed that an equality screening be undertaken prior to a decision being made in relation to funding for 19/20. Officers finalised this screening and the findings show that progress has been made in increasing the participation of underrepresented groups and this has been reported separately through the Strategic Policy and Resources Committee. The IABA continue to target underrepresented groups in its delivery of the 23/24 programme with particular focus on the events, club based sessions and the non-contact boxing programme.
4.0	**Appendices – Documents Attached**
	Appendix 1: IABA 2023-2024 Performance Report to end of Quarter 3 Appendix 2: IABA 2024-2025 Proposed work plan and Budget

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Boxing Strategy KPI Report 23-24 Year to date Total

To have an effective efficient Pathway to engage and nurture talent within Belfast

KPI	Description	Female	Male	Total
1.1	Run 3 talent squads in Belfast (2 Male 1 Female)	0	0	0
1.2	To Run competitive opportunities for Belfast talent squads (2/3)	0	0	0
1.3	Number of boxers getting Elite Gym Membership	1	4	5
1.5	nber of boxers obtaining support for sport funding or outside fun	2	8	10
2.1	To run 1 volunteer education event with 32 clubs represented and 40 participants (number of participants)	0	0	0
2.2	To run 1 Volunteer recognition event with a minimum of 30 participants from clubs present	0	0	0
3.1	To run 1 Scoring/Event Official Course per year with 10 newly trained officals	3	8	11
3.2	To run 1 Referee and Judging Course per year with 20 newly trained officals	6	18	24
3.3	Delivery of a minimum of 2 Committee training courses throughout the year to improve club governance	15	29	44
To recruit, train and sustain active coaches within Belfast				
4.1	5 coaches receive talent coach training and mentoring	0	6	6
4.2	20 new grassroots coaches trained	6	17	23
4.3	50 new people accessing online resources	14	38	52
4.4	Increase the number of female coaches	0		0
4.5	To work with mental health training providers to design a toolkit for every club and to deliver training and webinars. To encourage clubs to appoint a Mental Health and Wellbeing Champion. 10 Clubs to be involved (number of clubs involved)			4
4.6	5 clubs trained on inclusive boxing module			23
To grow and sustain club membership within Belfast				
5.1	160 participants at come and try it event	112	188	300
5.2	1600 pupils taking part in non contact boxing sessions	801	1204	2005
5.3	160 participants at Belfast Day of Boxing	112	188	300

5.4.1	2 new clubs established and availing of seeding grant			0
5.4.2	4 clubs obtaining equipment grants			0
5.4.3	27 clubs obtaining membership development grants			17
5.5	50 new members in Belfast clubs	13	65	78
5.6	15 clubs receiving for support for sport grants			0
5.7	180 participants in holiday camps	167	352	519
To promote and sustain good governance standards within Belfast clubs				
6.1.1	2 clubs to attain clubmark accreditation			0
6.1.2	8 clubs to attain reaccreditation			0
6.2	180 participants in good relations programme	167	352	519
Funding to support competitive local and international events in Belfast				
7.1	Deliver 8 local events			5
7.2	Deliver 2 international events			1
7.3	150 male competitors		628	628
7.4	50 female competitors	108		108
7.5	50 visiting competitors	0	233	233
7.6	150 Belfast competitors	108	395	503
7.7	5 visiting officials	0	20	20
7.8	15 Belfast officials	0	52	52

Belfast Boxing Strategy 2024-2025 Plan

SUMMARY OF STRATEGIC CHALLENGES, AIMS AND KPIS

Strategic Challenge	Pathways	Coach Education	Club Development and Grassroots	Governance
Strategic Aims	1.0 To have an effective efficient Pathway to engage and nurture talent within Belfast. 2.0 To recruit, train and sustain active volunteers, who are trained to best practice standards within Belfast 3.0 To recruit, train and sustain active officials, who are trained to the highest standards within Belfast. 7.0 Events Schedule and Numbers.	4.0 To recruit, train and sustain active coaches, who are trained to the highest standards within Belfast	5.0 To grow and sustain club membership within Belfast	6.0 To promote and sustain good governance standards within Belfast boxing clubs.
KPI'S	1.1 - Run talent squads in Belfast (1 male, 1 female) 1.2 - To run competitive opportunities for Belfast Talent Squads 1.3 - Number of boxers getting Elite Gym Membership 1.4 – Promote individual talent boxer grants, and promote the BCC 'Support for Sport' funding opportunities 2.1 - To run volunteer education event for clubs, aiming for 40 participants (could include recognition of volunteers) 3.1 - To run 1 scoring/event official course per year with 10 newly trained officials 3.2 - To run 1 referee and judging course per year with 20 newly trained officials 3.3 - Delivery of minimum of 2 committee training courses throughout the year to improve club governance 7.1 - 6 Local Events per year 7.2 – 2 International Events per year 7.3 – 200 male competitors 7.4 – 80 Female competitors 7.5 – 50 visiting competitors 7.6 – 200 Belfast competitors 7.7 - 10 visiting officials 7.8 – 15 Belfast officials	4.1 -5 coaches to receive talented coach bespoke training and mentoring. 4.2 -20 new coaches to be trained each year. 4.3 - 50 people accessing online coaching area to be updated on a regular basis. 4.4 - Increase the number of female coaches across the city 4.5 - All clubs to receive personalized toolkit with clubs to be trained up and appoint a mental health champion – 15 clubs to be involved 4.6- 15 participants to receive disability/inclusive awareness training	5.1 - 200 participants at come and try it event/day of boxing events 5.2- 2000 pupils to take part in non-contact boxing 5.4.1 – 2 new clubs established and availing of seeding grant. 5.4.2 - 30 clubs obtaining membership growth/ equipment/ individual athlete grants. 5.5 - 50 new members to boxing within Belfast. 5.6 – 6 clubs receiving for support for sport grants 5.7 – 200 participants in holiday camps	6.1 – 5 clubs per season attaining IABA Governance Framework Workshop. 6.2 – Delivery of good relations programme to 100 participants within the holiday camps
Budgets	£19,000- Pathways & £42,000- Events	£11,500	£21,000	£1,000
Salaries				£105,500
Total				£200,000

STRATEGIC CHALLENGE NUMBER 1: PATHWAYS- FROM GRASSROOTS- TALENT-ELITE (BOXERS, VOLUNTEERS AND OFFICIALS)

1.0 Aim	**1.0 To have an effective, efficient pathway at all levels of boxing within Belfast, helping to engage and nurture talent.**			
Action	KPI	Partners, Roles, and Responsibilities	Target Audience	Resource/Budget/eligible cost
1.1 To provide talent squads within Belfast at a range of age groups, linking into the IABA performance pathway and talent ID Testing.	To run talent ID Testing to select boxers for the following talent squads. Boy 1,2& 3 (11-14) x 2 (Novice Boys 0-6 bouts & Open Class boys 6+ Bouts) Girl 1,2& 3(11-14) Also, to link in with UHP camps in which Belfast Boxers will be part of also.	IABA Assistant HP Coach in Ulster will train all talented coaches taking the talent squad training sessions in the assessment and talent ID process. All Squads will also be tested in line with similar tests carried out for senior elite athletes within the Ulster High Performance System, this way exposing young boxers to HP System and fitness and training tests from a younger age.	All Belfast Clubs who cater for the following age groups: Boy 1,2& 3 (11-14) x 2 (Novice Boys 0-6 bouts & Open Class boys 6+ Bouts) Girl 1,2& 3(11-14)	IABA Staff time – Assistant High-Performance Coach Belfast City Council Funds requested for coaching costs of talented coaches for testing process and venue hire. Costs related to Talent camps coaching, accommodation/ Travel. .
1.2 To run competitive opportunities for Belfast Talent Squads. Boy 1,2& 3 (11-14) x 2 (Novice Boys 0-6 bouts & Open Class boys 6+ Bouts) Girl 1,2& 3 (11-14)	To run competitions/competitive opportunities for the young boxers to display their talent and to demonstrate their progression since being on the talent squad programme. These will be inter county match ups against other County's which we expect 5-10 Belfast Boxers Per event.	The IABA High Performance will support the training programmes for talent squads. As part of this the Assistant HP Coach will look to mentor the coaches to ensure consistency is being delivered from training to competitions. The CAB representatives will arrange a county competition within a Belfast venue and will provide referee/judges and table officials. All Squads will also be brought up to the High-Performance Unit in UUJ to take part in a session with the High-Performance Coach.	All Belfast Clubs who cater for the following age groups: Boy 1,2& 3 (11-14) x Open Class boys 6+ Bouts) Girl 1,2& 3 (11-14)	CAB Volunteer time to organise, run and administer the county competition/competitive opp's. Belfast City Council Funds requested for Venue Hire, officials' fees, andpurchase of medals for participants- approximately.

1.0 Aim	**1.0 To have an effective, efficient pathway at all levels of boxing within Belfast, helping to engage and nurture talent. - continued**			
Action	KPI	Action	Target Audience	Resource/Budget/eligible cost
1.3 Gym Membership for Elite Performers	Numbers of Boxers successful in obtaining free membership per year. 3 per year	BCC to provide details of the scheme to the steering group. GLL Foundation scheme. The steering group will be responsible for distributing andcommunicating widely the scheme and its criteria. IABA staff can help boxers fill out forms if necessary	All National champions and Ulster and Antrim Champion boxers	IABA Staff to distribute and promote Free Gym membership through GLL Scheme to the Ulster HP Unit and any talented boxers in Belfast. - No cost aside from staff time
1.4 Promote individual talent boxers' grants and promote the BCC 'Support for Sport' funding opportunities	6 Boxers successful in obtaining grantaid per year. (Mary peters trust, GLL foundation, HP Athlete Support Scheme).	BCC to provide details of the scheme to the steering group. IABA Performance Pathways committee will be responsible to distribute and communicate widely the scheme and its criteria to all boxers within the HP Unit. IABA staff can help assist boxers fill out forms if necessary	All National champions and Ulster and Antrim Champion boxers	IABA Staff to distribute and promote grant aid schemes to the Ulster HP Unit and any talented boxers in Belfast No cost aside from staff time

Aim	**2.0 To recruit, train and sustain active volunteers, who are trained to best practice standards within Belfast**			
Action	KPI	Partners, Roles, and Responsibilities	Target Audience	Resource/Budget/eligible cost
2.1 To run volunteer education opportunities and events for clubs. The training will be IABA led to recognise and aware the volunteers.	1 event to be delivered per year- targeting 40 participants from the 32 clubs across the city delivered by March 2025.	IABA to provide expertise of Club Development Officer within Ulster, Operations Manager and IABA Health and Safety Officer and Child Protection Officer to deliver a volunteer education and training event within Belfast. IABA will also provide the Workforce Development Officer to run and administer the organisation each year. Topics and workshops to be included: • Health and safety of club facilities • Mental Health and Wellbeing workshop • New IABA Policies and procedures • Good Relations Training and update • Fundraising, Grant aid and sponsorship • Affiliation procedures • Volunteer committee roles and responsibilities. • Committee Skills • Examples and workshops providing examples of best practice Community outreach programmes such as: boxing for fitness, mental health and well-being programmes, rehabilitation programmes for offenders.	All 32 Belfast based clubs' representatives to attend. New Clubs under development. Clubs Outside Belfast could attend at a cost.	IABA Staff time – Club Dev, Operations Manager, H&S Officer and CP Officer and Workforce Officer Belfast City Council Funds could be used for this if based in Belfast, however this could possibly be funded from other sources outside of Belfast. But we would like flexibility to host in BCC and to help cover BCC club costs if required. Clubs Outside Belfast could attend at a cost.

		BCC- to provide Girdwood Venue through GLL. If this is not possible, we would seek to hire a Belfast Hotel venue		

Aim	**3.0 To recruit, train and sustain active officials, who are qualified to the highest standards within Belfast.**			
Action	KPI	Partners, Roles, and Responsibilities	Target Audience	Resource/Budget/eligible cost
3.1 Officials to receive training in line with world standards and systems.	To run 1 scoring/event official course per year- 10 newlytrained officials per year. 10% will be females.	IABA will also provide the Workforce Development Officer to run and administer the administration for the programme each year. CAB will advertise, market and promote these opportunities to its affiliated members. CAB will also	New aspiring referees/judges aged 18+ Current Clubs without referee/judges New Clubs under development	Belfast City Council Funds to cover cost of running course to include venue hire, hospitality, tutor costs. Possibility of running event for the assessment of new officials and for new computerised scoring system
3.2 To deliver grassroots refereeing, judging qualifications and table officials	Delivery of 1 referee & judging course- 20 new referees by 31st March each year. 10% will be females.	Identify clubs who may not have qualified referees and judges within their clubs.	Clubs looking to run club events and tournaments will need to have appropriately trained referees and judges.	Belfast City Council Funds to cover cost of running course to include venue hire, hospitality and tutor costs. CAB will support and promote training opportunities.
3.3 To deliver committee training courses throughout the year to improve club governance.	Delivery of 2 committee courses/training throughout the year to improve club governance.	UBC will also provide Referee Tutors to run the Level 1 and Level 2 referee and judging qualifications	Link in some of the aspects of the club governance framework to help clubs improve their best practice.	Committee training opportunities to be provided through IABA Workforce and Club Development, costs to be covered by Belfast City Council funding.

Aim	**7.0 Funding to support competitive local and international events in Belfast**			
Action	KPI	Partners, Roles and Responsibilities	Target Audience	Resource/Budget/eligible cost
7.1– Local Events per year 7.2– International Eventsper year 7.3– male competitors 7.4– Female competitors 7.5 – visiting competitors 7.6 – Belfast competitors 7.7 - visiting officials 7.8 – Belfast officials	To deliver the number of events, competitors, and official opportunities in the events plan. 6 Local Events per year 2 International Events per year200 male competitors 80 Female competitors 50 visiting competitors 200 Belfast competitors 10 visiting officials 15 Belfast officials	Through the CAB and Boxing Development Officer liaising together venues across the city will be used to host events & competitive opportunities for both boxers and officials across the city as well as inviting in a range of competition from across the County, Province, Continent	All Belfast Based clubs, boxers, and officials.	BCC funds will be used to host the events and consume the costs agreed in the events plan.

STRATEGIC CHALLENGE NUMBER 2: COACH EDUCATION AND DEVELOPMENT

Aim	**4.0 To recruit, train and sustain active coaches, who are qualified to the highest standards within Belfast.**			
Action	KPI	Partners, Roles, and Responsibilities	Target Audience	Resource/Budget/eligible cost
4.1 To support the delivery of an IABA led Coach education programme for talented coaches within Belfast	To work with 5 coaches per year delivering a bespoke education programme by 31st March each year	IABA to provide expertise of Assistant HPC within Ulster and the performance pathways committee to help identify talented coaches within Belfast to take part in the programme. IABA will also provide the Workforce Development Officer to run and administer the administration for the programme each year.	Identified Level 1 and Level 2 Coaches, actively coaching in Belfast, identified by the Ulster HP Coach as potentially talented coaches with ability to progress to national and international coaching.	IABA Staff time and committee members time -HP Coach Ulster, performance pathways committee and Workforce Officer Belfast City Council Funds to cover cost of running course to include venue hire, hospitality, tutor costs.
4.2 To Support the delivery of grassroots boxing qualifications- i.e. Fundamentals or Level 1 IABA Qualification.	20 new coaches by 31st March each year.10% will be female.	IABA Workforce Development Officer to run and administer the programme each year CAB will advertise, market and promote these opportunities to its affiliated members. CAB will also identify clubs who may be either under or over capacity regards coaching-members ratios. CAB will also provide Coaching Tutors to run the Level 1 qualifications.	New aspiring coaches aged 18 + Current Clubs who's carrying capacity is exceeding their number of qualified coaches. Clubs looking to set up new sections to their clubs, e.g. female section, over 50's health and well-being etc.	Belfast City Council Funds to cover cost of running course to include venue hire, hospitality, tutor costs.
4.3 To update online Coaching / volunteer resources and inform clubs of updates.	Area to be updated on a regular basis with up to 50 new participants accessing the online resources area per year target by 31st March 2025.	IABA will also provide the Workforce Development Officer who will liaise with the other development officers, HP coaches and CAB to provide a range of online learning opportunities to clubs / volunteers.	A wide range of coaches from grassroots up to talented coach level.	This has now been launched and we will continue to update the online learning areas & social media pages with constant updates and learning ops.
4.4 To increase the number of female coaches in Belfast	To ensure that all coaching courses that are ran throughout the city have female representation. 10% of courses will aim to have new female coaches	IABA will utilise the strategy to help increase the number of female coaches in Belfast. Our Workforce Development Officer will work closely with the Belfast Development officer on assuring designated spots on course for females.	Parents of female boxers, female boxers themselves, youth and school groups, Women's groups etc.- all in a bid to actively target females to become coaches.	BCC Funds and IABA Funds- no additional funds required.

4.5 To work alongside mental health providers to generate a boxing specific tool kit and train clubs up in mental health and wellbeing awareness	We will work with TAMHI and other providers to design a toolkit for every club and run training and webinars with each club where we will encourage clubs to appoint a mental health champion. 15 clubs involved.	IABA will also provide the Workforce Development Officer who will organise with each club the training / webinar sessions that will be delivered by professionals to each individual club.	A wide range of coaches from grassroots up to talented coach level.	Belfast City Council Funds requested for design of toolkit and to bring in providers to deliver training and workshops with clubs.
4.6 Disability and inclusivity awareness training to be provided to clubs.	To have 15 participants from our clubs attend inclusive training module. This is to help put disability and inclusive physical activity into all our clubs.	IABA will provide the Workforce Development officer who will work with the Boxing Development Officer to set a date for training and to engage with clubs. Now incorporated within the IABA Fundamentals coaching course in partnership with CARA.	Coaches, Committee, Parents and Boxers.	Belfast City Council Funds Requested for room hire, refreshments and tutor costs.

STRATEGIC CHALLENGE NUMBER 3: Club Support and Grassroots Development

Aim	**5.0 To grow and sustain club membership within Belfast**			
Action	KPI's	Partners, Roles and Responsibilities	Target Audience	Resource/Budget/eligible cost
5.1 To hold come and try it events in collaboration with BCC sports development initiatives	200 pupils. 15% will be from underrepresented areas of the sport	IABA to organise and arrange schools come and try it events in conjunction with CAB. 2 Community Based coaches to run the event. IABA Development Officer to arrange. BCC to fund and promote event as BCC Event, BCC Media and PR Team to help get good local press coverage.	Females Children and young people, schools, people with disabilities and people from areas of deprivation.	*2X Community Based Boxing Coach-salary cost* *Venue Hire, additional coaches to deal with capacity and marketing and advertising info and hire o ring etc if necessary*
5.2 Continue to run non-contact boxing sessions in schools	2000 15% will be from underrepresented areas of the sport	IABA Development officer to organise and arrange non-contact sessions within schools. 2 Community Based coaches to run sessions. BCC to fund and promote schools' sessions. BCC Media and PR Team to help do a media launch for schools' sessions and get good local press coverage.	Females Children and young people, schools, people with disabilities and people from areas of deprivation.	*2X Community Based Boxing Coach- £23,000(salaries)* *Equipment to be purchased for new coach to conduct the duties of the role.*

5.4.1 – New clubs grants 5.4.2 – Equipment grants / individual athlete grants/Membership Development Grants	To have 2 new clubs established and availing of seeding grant Monitor the growth of membership across Belfast – providing all with equipment, individual and club membership growth grants (30)	BCC to provide grant aid for seeding grants and equipment grants through the sports development team if possible. The Steering Group committee could help to administer and manage the process if the sports development team cannot administer this process. The levels of funding are minimal with only 2 seeding grants available per year and 4 equipment grants. (should there be new clubs). Where we have no new clubs, we could look at giving individual athlete awards to specified talent. This could also be utilized where all membership growth grants are not expended. The committee can devise the application process and scheme if required.	New Boxing Clubs within Belfast	• Seeding Grants for newly developed clubs or junior sections of senior clubs. • Equipment Grants for clubs who can demonstrate the need for equipment for new clubs or existing clubs who have grown or need replacement equipment. • Or Membership Development Grants All at a cost of £500 per club to run come and try it event/holiday camps in a bid to increase membership of their clubs. Up to 32 clubs a year x £500. = £16,000 approx.
Aim	**5.0 To grow and sustain club membership within Belfast - CONTINUED**			
Action	KPI's	Action	Target Audience	Resource/Budget/eligible cost
5.5 New members	50 new members within clubs. 10% will be females	To feed new members thorough the school's programme and membership growth programmes into the club environment. Link directly in with the clubs.	Targeting underrepresented groups within the sport	*Using initiatives listed above.*
5.6 Promote the Belfast City Council Community Support Funding	Encourage 6 clubs to apply per year	IABA Staff to work with clubs to work up applications for Support for sport schemes.	32 Boxing Clubs based in Belfast	N/a No programme costs, only staff time.
5.7 Boxing Holiday Camps	200 participants per year. 15% will be from under-represented areas of the sport	IABA Staff to arrange and organise Easter and Summer Holiday Camps for Boxing. CAB to provide coaches to aid Community Coaches. To run a number of holiday/ membership growth programmes during holiday periods (Summer, Halloween or mid-term) Total of 200 participants with a specific emphasis on female inclusion.	32 Boxing Clubs based in Belfast, target local schools also.	*2X Community Based Boxing Coach- salary* Programme Costs- Venue Hire, Coaching Wages for additional coaches, marketing materials to facilitate bookings onto camps.

		IABA will administer the booking process.		

STRATEGIC CHALLENGE NUMBER 4: GOVERNANCE

Aim	**6.0To promote, improve, and sustain good governance standards within Belfast Clubs**			
Action	KPI	Partners, Roles, and Responsibilities	Target Audience	Resource/Budget/eligible cost
6.1 To work with Belfast based clubs to achieve the IABA Good Governance Framework	5 clubs to attend workshops or 1 to 1s with the IABA Club development officer.	IABA Development Officer to work with clubs to achieve this and will work 1 to 1 with clubs to put governance framework and structures in place in order to be more attractive to funders.	All Belfast based clubs	IABA Club Development Officer Staff Time BCC Funds club attendance fee, workshop costs to include venue hire, refreshments.
6.2 – To deliver a good relations programme within Belfast	To deliver a good relations programme to our clubs. 10% will be from underrepresented areas of the sport	IABA Operations Manager to build in Good Relations training into the holiday camps with 100 participants. This will link in directly with our holiday membership growth programmes and we will run individual club good relations training with our clubs at least once per year. Designing a bespoke scaled down training programme from what is currently delivered to IABA Members	All Belfast based clubs	IABA Staff Tie- Operations Manager over oversees Good Relations and Equality issues and programmes. IABA Good Relations bespoke Training Course designed for boxing in Ulster. Costs- tutor, venue hire and hospitality and any administration costs

Belfast City Council

PEOPLE AND COMMUNITIES COMMITTEE

Partnership Agreements 24/25

Subject:	Partnership Agreements 24/25
Date:	12th March 2024
Reporting Officer:	David Sales, Director of Neighbourhood Services
Contact Officer:	Nicola Lane, Neighbourhood Services Manager Margaret Higgins, Lead Officer Community Provision Cormac McCann, Lead Officer, Community Provision

Is this report restricted? **Yes** [x] **No** [ ]

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number [3]

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	[ ]
After Council Decision	[ ]
Sometime in the future	[ ]
Never	[ ]

Is this report eligible for call in? **Yes** [x] **No** [ ]

1.0	Purpose of Report or Summary of main Issues
1.1	The purpose of this report is to advise members of the existing Partnership Agreements that are in place to deliver services aligned to Neighbourhood Services activity. Members are asked to approve future funding to continue these partnership agreements in 24/25.

	This report also advises members of a request from Belfast Healthy Cities (BHC) that Belfast City Council (BCC) applies an inflationary award to the funding that it provides to Belfast Healthy Cities for the remaining term of their funding agreement, years 24/25 and 25/26.
2.0	**Recommendations**
2.1	It is recommended that Committee; • Agree to continue funding to each of the partners at the same level for the 24/25 financial year (£261,359) • Note that council is not in a position to provide an inflationary award to Belfast Healthy Cities due to the precedent that this would set for other funding agreements and the lack of available budget.
3.0	**Main report**

Background

3.1 Members are aware that City & Neighbourhood Services work in partnership with a number of organisations that share common strategic objectives and that some of this work is supported through annual funding agreements to deliver against agreed outcomes.

3.2 In 2021/22, an extensive review of the first six Partnership Agreements listed below was completed; the review concluded that the agreements provided strategic alignment, added value to the Council/City and were value for money. In line with these findings, council agreed that these partnership funding arrangements should continue at the same level to deliver services in 22/23 and 23/24.

At the start of 2023, a desktop review of the last two agreements listed below, which were not part of the original review, was also carried out. It was agreed that these 2 funded programmes should be considered as part of the overall departmental partnership arrangements and have therefore been included in this paper for consideration.

Project	**Funding**
Belfast Hills Partnership	£36,900
Lagan Valley Regional Park	£88,000
Outdoor Recreation NI (promotion of mountain bike trails)	£5,250
Keep NI Beautiful (Live Here Love Here and Eco Schools Project)	£55,000
Mary Peters Trust	£5,000
Bryson Energy (previously Play Resource)*	£31,209
Belfast Mela	£20,000
Belfast International Arts Festival	£20,000
TOTAL	**£261,359**

* Note – Play Resource Warehouse has merged with Bryson Energy.

Request from Belfast Healthy Cities for inflationary award

3.3 Belfast's membership to the WHO European Healthy Cities Network is facilitated by Belfast Healthy Cities (BHC), an independent partnership organisation. In May 2021, the City of Belfast was successful in its application to re-designate as a WHO Healthy City and participate in the WHO European Healthy Cities Network until April 2026.

	On 10th January 22024, BHC contacted council officers to request that they bring a request for an increased inflation cost to the People and Communities Committee. The request outlines that Belfast City Council has funded Belfast Healthy Cities since its establishment in 1998 and that the Board of Directors are very grateful for this financial contribution. BHC highlight that Belfast City Council reduced their funding to Belfast Healthy Cities at a special meeting in January 2017, from £89,586 to £81,294 per annum, to below the 2009/2010 funding level. Funding has remained at this level since 2017. Belfast Healthy Cities view that this; '*is in essence an ongoing decrease in funding – given the ongoing challenges of inflation. It would be important to relay this to the Committee, given the number of new Committee members who may not be aware of this position.* The request from BHC also advises that the three other core funders have increased their funding this year by over 3.5 % which 'takes into account the increase in National Living Wage of 10.3%, non-pay at 3%, and the reversal of the 2022/23 increase in Employers' National Insurance of 1.25%'.
3.4	Members should note that Council does not have a policy to provide annual increments to multi annual funding awards. C&NS and council generally have a number of multi annual funding agreements which do not include a mechanism to provide an annual enhancement. To provide an increment to one award would have implications for all funding awards and there is no available budget to resource this. In addition, the Partnership Agreements outlined in this paper do not receive an annual increment.
	<u>Financial implications</u>
3.5	The total financial allocation to these partner funding arrangements is £261,359. These budgets have been agreed as part of rate setting for 24/25.
3.6	A 3.5% increase to the current Belfast Healthy Cities funding award would be £2,845. Council are one of four core funders to Belfast Healthy Cities, along with the Public Health Agency (PHA), Belfast Health and Social Care Trust (BHSCT) and Northern Ireland Housing Executive (NIHE). Annual funding amounts to over 300k of which BCC contributes £81,294 per annum until March 26. There is no current budget to provide this increment. Members may wish to note that through the CSP council provides £4,277,766 in annual funding to support multi annual funding awards. Members will be aware that at last month's meeting the Belfast Advice Group asked Council to consider a 3% annual increment to their funding, which would cost approximately £30,000 p.a. Applying an annual increment of 3.5% to the other multi annual awards supported through the CSP (Capacity and Revenue) would require a budget of £114, 734 p.a. The Partnership Agreements covered by this paper do not receive an annual increment. To apply a 3.5% uplift would cost £9,148 p.a
	<u>Equality or Good Relations Implications and Rural Needs Assessment</u>
3.7	Council does not have a policy on implementing annual inflationary increases to funding agreements. A decision to introduce an increase for one funding agreement could set a precedent and have an impact on other funding awards.
4.0	**Appendices – Documents Attached**
4.1	N/A

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PEOPLE AND COMMUNITIES COMMITTEE

Belfast City Council

Subject:	**Engagement Framework for Large Promoter Events at Belfast Park Venues**
Date:	12 March 2024
Reporting Officer:	David Sales, Strategic Director of City and Neighbourhood Services
Contact Officer:	Stephen Leonard, Neighbourhood Services Manager

Restricted Reports

Is this report restricted? **Yes** ☐ **No** ☑

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number ☐

1. Information relating to any individual.
2. Information likely to reveal the identity of an individual.
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
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6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction.
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	☐
After Council Decision	☐
Sometime in the future	☐
Never	☐

Call-in

Is the decision eligible for Call-in? **Yes** ☑ **No** ☐

1.0	**Purpose of Report/Summary of Main Issues**
1.1	Committee are reminded that a number of review papers have been presented to members detailing actions and work carried out by officers to develop an engagement framework to ensure effective resident, community and local business consultation with those who live and work near concert and festival venues.
1.2	At the December meeting of the People and Communities committee a comprehensive review report of all the 2023 large promoter events was presented. Members agreed that a report be submitted to a future meeting on agreeing a more structured approach for large scale city events, including engagement with residents, promoters, and Elected Members.
2.0	**Recommendation**
2.1	Committee is asked to; 1. endorse the approach currently adopted at Ormeau Park and 2. support the continued development of the evolving approach at Boucher Road Playing Fields.
3.0	**Main Report**
	<u>Key Issues</u>
3.1	For the past number of years officers have been working to create a successful model of engagement with regards the large-scale events that gain permission to operate at Belfast Park venues. There are challenges to delivering a consistent approach to engagement due to the diverse nature of event types, participant numbers and venues. Depending on the venue Council can accommodate attendances up to 42,000 people at a single concert. The challenge of adopting a consistent approach is compounded by varied levels of neighbourhood and community development organisation in the areas immediately surrounding our venues.
3.2	In addition to ad hoc requests there are a number of events that reoccur on an annual basis and the promoters responsible for these events apply to the Council for multiple year permissions to use the venues. Securing a venue for several years in advance allows promoters to book headline acts and attract the best artists to Belfast.
	<u>Ormeau Park</u>
3.3	In 2022 the Parks Events and Outreach Manager in City and Neighbourhood Services supported by colleagues in building control started a multi-agency approach to the pre-event resident and community engagement for a series of events being delivered in Ormeau Park. The senior responsible officer for the ongoing work is the Neighbourhood Services Manager.
3.4	The engagement forum includes attendance from: • The event promoter and their event safety advisor. • Community Provision • Building Control • Community Safety • Regulatory Services • PSNI • Elected representatives from local DEA's • Resident and Community organisations operating in the local area • Local businesses • Youth Practitioner Organisations operating in the local area

3.5	The community sector organisations, resident groups and businesses have welcomed this approach. They believe that this is the most effective way for them to work with the range of relevant agencies, to have their concerns heard, to contribute ideas and solutions and ultimately to reduce negative impacts on their neighbourhood.
3.6	Post evaluation sessions are conducted by the engagement forums to review the success and impact of the agreed mitigations, with a lessons learned approach.
3.7	<u>Boucher Road Playing Fields</u> In 2023 officers, supported by elected members, endeavoured to replicate this approach at Boucher Road Playing Fields for the series of August and September festivals. The engagement led to many improvements and was deemed successful by the residents who attended the pre-event session.
3.8	The key challenge at this venue is a lower level of residents, community, and businesses development organisation when compared to the Ormeau and Ravenhill area. The only way to currently engage is to leaflet drop all the residents and try to host a session with a high number of individuals rather than a strong collective voice. It is recognised that attempting to organise effective engagement with a promoter and a large group of dissatisfied individuals would be counterproductive rather than progressive at this stage.
3.9	To support progress a series of meetings have taken place with elected representatives from the Balmoral DEA resulting in a number of agreed actions for developing and growing the capacity of a stakeholder forum specific to large events at Boucher Road. The main actions are as follows: • Council officers and elected representatives to meet residents in March/April and draft a list of key issues and mitigations. • Community Services area support team to work with residents and businesses to establish a representative forum which will attend future pre-event and post-event engagement meetings. • Council officers and elected representatives to present the issues and mitigations to the promoter of the first concert in May with the expectation to include the key actions within the site licence between Council and the promoter. • A post event evaluation session to be arranged with residents following the event.
3.10	It is anticipated that the work, supported by community services, to establish a stakeholder engagement forum will continue throughout the summer months and may be ready to engage with promoters and other agencies for the August and September festivals.
3.11	Once a representative group is established the stakeholder engagement forum for events at Boucher Road will involve attendance by the same agencies as those described in 3.4 above.
3.12	<u>Financial implications</u> There are no financial implications with this report.
3.13	<u>Equality or Good Relations Implications and Rural Needs Assessment</u> There are no equality or good relations implications with this report.
4.0	**Appendices - Documents Attached**
	None

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PEOPLE AND COMMUNITIES COMMITTEE

Belfast City Council

Subject:	Proposed response to the consultation on the new Strategy for Victims and Survivors
Date:	12 March 2024
Reporting Officer:	David Sales, Strategic Director of City and Neighbourhood Services
Contact Officer:	Godfrey McCartney, Good Relations Manager David Robinson, Senior Good Relations Officer (Acting)

Restricted Reports

Is this report restricted? **Yes** [ ] **No** [x]

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number [ ]

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	[ ]
After Council Decision	[ ]
Sometime in the future	[ ]
Never	[ ]

Call-in

Is the decision eligible for Call-in? **Yes** [x] **No** [ ]

1.0	**Purpose of Report/Summary of Main Issues**
1.1	To seek approval for a Council response to the consultation on the new Strategy for Victims and Survivors.
2.0	**Recommendation**
2.1	That Members note the contents of the proposed response to the strategy and submit for agreement to the People & Communities Committee for approval for submission to The Executive Office, by the closing date of 13 March 2024.
3.0	**Main Report**
3.1	Members may be aware that The Executive Office is currently undertaking a public consultation on a new Strategy for Victims and Survivors.
3.2	The Strategy has been developed through collaborative co-design and partnership working with the Commission for Victims and Survivors and the Victims and Survivors Service, as well as with victims' and survivors' representative groups. Through this engagement, victims and survivors have been placed at the heart of the development of the Strategy.
3.3	The Strategy proposes a new Vision of "A trauma informed society that addresses the needs of victims and survivors" and sets out high level outcomes and actions under three pillars – Past, Needs and the Future. It builds on the progress made to date to ensure the needs of victims and survivors continue to be met.
3.4	As part of this consultation process, the Council has been invited to respond to the consultation. This is via an online questionnaire. An initial draft response has been prepared and is attached as an appendix below. Many of the questions are 'yes/no' answers. Any additional comments that are proposed are highlighted in yellow below. Once agreed by the People & Communities committee, the questionnaire will be completed by the Acting Senior Good Relations Officer and submitted on behalf of the Council, with the provision that the response is subject to full Council approval at its April meeting.
3.5	**Financial and Resource Implications** None
3.6	**Equality or Good Relations Implications/Rural Needs Assessment** The response to the consultation represents an opportunity for the Council to consider the issues and needs prevalent to victims and survivors of the conflict and to demonstrate support for ongoing work in this area.
4.0	**Appendices - Documents Attached**
	Draft consultation response

Appendix 1 – draft consultation response (for insertion into online survey questionnaire)

1. Are you responding to this consultation as an individual or representing an organisation?

○ Individual ◉ Organisation - please specify below

Please add name of organisation

Belfast City Counc

2. Prior to answering this questionnaire, were you aware of the Strategy for Victims and Survivors?

◉ Yes ○ No

3. How were you made aware of the Strategy?

☐ Accessed services made available through the relevant agencies/bodies (e.g. VSS, CVS, the Forum) ☐ Community group ☑ Traditional media (e.g. newspapers, TV, radio) ☐ Social media ☐ Word of mouth ☑ Other (please specify):

Please provide any further comments you may have in relation to your response

Invitation to partic

1. Vision, Principles and Values

Initiatives and proposals within the Strategy for Victims and Survivors will work towards an enduring vision articulated by a number of key principles and core values.

1. Do you agree with the vision as set out below for the strategy?

Strategy Vision

A trauma informed society that addresses the needs of victims and survivors

◉ Yes ○ No ○ I don't know

Please provide any further comments you may have in relation to your response

Yes, the primary aim of such a strategy should have the needs of victims and survivors at the heart of it.

2. Do you agree with the Principles and Values as set out below for the new strategy?

Principles and Values

- **Victim centred.**
- **Trauma informed.**
- **Collaboration and partnership.**
- **Responsive to changing needs.**
- **Evidence based.**
- **Trust and confidence.**
- **Empowering.**

◉ Yes ○ No ○ I don't know

Please provide any further comments you may have in relation to your response

Yes, the strategy should be genuinely and wholly victim centred.

3. Do you feel there are Principles and Values missing from this list?

Yes - please specify No

Please provide any further comments you may have in relation to your response

Is there the potential to include something on reconciliation? For example, should a value be: 'contributing to wider reconciliation efforts"?

2. Victims and Survivors Strategy Strategic Pillars

1. Do you agree with the aim listed below for the Past pillar?

Past Pillar Strategic Aim

Support victims and survivors and their families as they move forward from experiences of the past.

Yes No I don't Know

Please provide any further comments you may have in relation to your response

2. Do you agree with the high level outcome listed below for the Past pillar?

Past Pillar High Level Outcome

Victims and Survivors feel supported in their journey.

Yes No I don't know

Please provide any further comments you may have in relation to your response

3. Do you agree with the key priority areas listed below that have been included under the Past Pillar?

Past Pillar Key Priorities

- We will continue to work with victims and survivors to meet their needs and ensure that they are supported in dealing with the legacy of the past, and we will be flexible in the face of changing needs and prevailing circumstances.
- Continue to support victims and survivors through the Advocacy Support Network within the VSS PEACE PLUS project currently funded through the VSS.
- Work with victims and survivors, and wider society, to develop a designated public space of reflection where people can come together to remember our past.
- Work with third and faith sectors to recognise and promote the Annual Day of Reflection on 21st June each year.
- Further explore themes of Acknowledgement including shared acts of commemorative activity to collectively acknowledge the impact of the Troubles/conflict on the peoples of these islands and beyond.
- Engage with the Irish and UK Governments to ensure they are aware of the needs of victims and survivors, and the potential impact on individuals and communities of failing to meet those needs.

- Continue to deliver the Troubles Permanent Disablement Payment Scheme in a victim centred and trauma informed way.

Yes No I don't know
Please provide any further comments you may have in relation to your response

On the point of the Annual Day of Reflection, you could add in 'statutory' as well as 'third' and 'faith' sectors. Belfast City Council has delivered the Annual Day of Reflection now since 2022.

4. Do you feel there are Key Priority Areas missing under this Outcome?
Yes No I don't know
Please provide any further comments you may have in relation to your response

Could a point on reconciliation be included? For example, could something like the following be added:

Develop a greater collective understanding of what reconciliation means in the context of a post conflict society, with the needs and concerns of victims being paramount in such an understanding.

Victims and Survivors Strategy Strategic Pillars
1. Do you agree with the aims listed below for the Needs pillar?

Needs Pillar Strategic Aims

To support and enable victims and survivors to improve their health and wellbeing, addressing the factors which impact on mental and physical health.

To ensure victims and survivors have an improved awareness of and access to high quality, trauma informed services.

Yes No I don't know
Please provide any further comments you may have in relation to your response

We see this as a key part of this strategy.

2. Do you agree with the high level outcome listed below for the Needs pillar?

Needs Pillar High Level Outcome

Improved physical health and emotional wellbeing of victims and survivors.

Yes No I don't know
Please provide any further comments you may have in relation to your response

3. Do you agree with the key priority areas listed below that have been included under the Needs Pillar?

Needs Pillar Key Priorities

- Deliver a strategy that can adapt to changes in needs, environment and learning to ensure the best possible outcomes for victims and survivors and encourage piloting of new ways to support victims and survivors.

- Ensure access to victim-centred, trauma informed, needs based support and services that contribute to improved wellbeing and quality of life for victims and survivors.
- Raise awareness of Troubles/conflict-related trauma and the needs of victims and survivors in other service providers and across government.
- Maintain a Network of Health and Wellbeing Case Managers and Regional Health and Wellbeing Case Workers to identify and address the needs of victims and survivors.
- Deliver the Regional Trauma Network and monitor progress to ensure learning and development for the future provision of services.
- Deliver appropriate support for the bereaved.
- Improve access to services for rural and socially isolated, including through the promotion of befriending.
- Invest in capacity of the sector through training and development to meet national and regional standards, research, and improved regulation.
- Improve awareness of services and support available including clear pathways and signposting.
- Review the accessibility of the services we provide, including any potential barriers to access.
- Work to better understand the different impact that the Troubles/conflict had on men and women, and how the different needs can be met today.

(•) Yes ( ) No ( ) I don't know
Please provide any further comments you may have in relation to your response

Could it also be included: To involve and include survivors and victims in supporting the development of a greater understanding of what reconciliation means for our society.

4. Do you feel there are Key Priority Areas missing under this Outcome?
( ) Yes (•) No ( ) I don't know
Please provide any further comments you may have in relation to your response

See above as an additional comment

Victims and Survivors Strategy Strategic Pillars
1. Do you agree with the aim listed below for the Future pillar?

Future Pillar Strategic Aim

To ensure that families are supported, and that society works towards "breaking the chain" of transgenerational trauma.

(•) Yes ( ) No ( ) I don't know
Please provide any further comments you may have in relation to your response

2. Do you agree with the high level outcome listed below for the Future pillar?

Future Pillar High Level Outcome

Improved quality of life for victims and survivors

Yes No I don't know

Please provide any further comments you may have in relation to your response

3. Do you agree with the key priority areas listed below that have been included under the Future Pillar?

The Future Pillar Key Priorities

- Continue to include those with lived experience in discussions and decisions around issues that affect them.
- Ensure victims and survivors issues are integrated into relevant and emerging strategies, policies and programmes including for example the Central Good Relations Fund and Communities in Transition, which can deliver outcomes for victims and survivors. We will actively seek opportunities for strategic alignment and collaborative working across government and the wider public sector, by creating connections with initiatives supporting reconciliation and the development of a shared and better future.
- Carry out research to maintain and develop our understanding of the current needs of victims and survivors and conduct, as necessary, further research into the impact of transgenerational and intergenerational trauma to ensure adequate services and support are available and raise awareness of the transgenerational transmission of trauma.
- Work with other sectors and Departments to build on existing and create new formal and informal education programmes to enhance knowledge and mutual understanding about the transgenerational impacts of the Troubles/conflict.
- Work together with faith organisations to raise awareness of victims and survivors needs and help shape a peaceful society for all.
- Consolidate expertise within the sector and work in partnership to protect front line services for victims and survivors, supporting victims' groups to partner and collaborate to deliver for victims and survivors on a regional basis.
- Build upon our experience in dealing with trauma and work to support partners in the sector through organisational transition to support our aspiration of becoming a fully trauma informed society that can be an exemplar for others.
- In light of the results of these actions, review how best victims and survivors can be supported in the future.
- Review the facilities available to community and voluntary organisations who support victims and survivors and consider the need for a capital building programme.
- Build links between sectors, across the public sector and with GB and RoI to raise awareness and share learning on the needs of victims and service provision for those who have suffered trauma.
- Expand upon and support the roll out of trauma education throughout society, raising awareness of trauma and developing trauma informed services.

Yes No I don't know

Please provide any further comments you may have in relation to your response

4. Do you feel there are Key Priority Areas missing under this Outcome?

Yes No I don't know

Please provide any further comments you may have in relation to your response

Could something on memorialisation be considered? For example, could the implementation of the strategy consider the contents of the report of the Commission on Flags, Identity, Culture and Tradition on the area of Memorials, Remembrance and Commemoration (Chapter 15), and in particular the section that remembering the dead "should be done in a way that is respectful, sensitive, dignified and seeks to avoid causing pain or hurt to others" (p.140) https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/execoffice/commission-on-fict-final-report.pdf

Belfast City Council

PEOPLE AND COMMUNITIES COMMITTEE

Subject:	Independently Managed Community Centres and Service Level Agreements
Date:	12 March 2024
Reporting Officer:	David Sales, Strategic Director of City and Neighbourhood Services
Contact Officer:	Cormac McCann, Lead Officer – Community Provision

Is this report restricted?	**Yes**		**No**	x

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	
After Council Decision	
Sometime in the future	
Never	

1.0	**Purpose of Report or Summary of main Issues**
1.1	To seek authority to pay: • Independently Managed Community Centres (IMCCs) awards for the 2024/25 funding period. • An annual Consumer Price Index increase (CPI) award to IMCCs. • Annual Service Level Agreement (SLA) to Dunmurry Community Association
2.0	**Recommendations**
2.1	That authority is given to;

- Pay annual revenue awards for the 2024/25 funding period to seven IMCC's including the annual CPI increase. Award amounts will increase each year requiring Committee authorisation.
- Make separate payments of the CPI increase where applicable following its confirmation April/May 2024.
- In compliance with the existing SLA, pay up to the maximum award to Dunmurry Community Association at Fullerton Park on an annual basis.

3.0 Main report

Background

3.1 Members will recall Council has long standing arrangements in place to provide financial support to 7 Council community centres that are managed independently by the community sector as well as Service Level Agreements (SLA's). The SLA with Dunmurry Community Association at Fullerton Park relates to a previous decision by Council to provide funding as a result of legacy commitments arising from LGR.

3.2 As part of the rate setting process for 2020/21 Committee agreed that the allocation to IMCC's would be subject annually to any CPI increase which would be applied on issue of Letter of Offer. People and Communities Committee 22nd Sept 2022 agreed CPI increase on all future awards to IMCC's. As CPI details will not be available until April/May 2024 some CPI increases will be paid separately from the grant award. A clause will be included in all funding agreements to allow for the processing of the CPI increase payment when the details are available.

3.3 The 2024/25 individual allocations to IMCC's are below. CPI increase to be added when available April/May 2024

Independently Managed Centres	**Amount**
Shaftesbury Recreation Centre	£69,943.75
Grosvenor Recreation Centre	£69,943.75
Ballymacarrett Recreation Centre	£63,046.00
Denmark Street Community Centre	£24,254.02
Carrick Hill Community Centre	£38,597.29
Sally Gardens	£69,943.75
Hanwood	£69,943.75
Total	**£405,672.31**

Service Level Agreement	**Amount**
Dunmurry Community Association at Fullerton Park	Maximum Award: £6,500.00

4.0 **Financial Implications**

Annual awards to IMCC's and SLA's are contained within approved budgets and factored into future budgeting/forecasting processes.

Equality or Good Relations Implications and Rural Needs Assessment

4.1

	This will be considered throughout, and any appropriate issues highlighted to Members. Any amendments to existing scheme or new scheme will be considered in the context of any equality/Good Relations and rural needs considerations.
5.0	**Documents attached**
	None

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Belfast City Council

Subject:	Consultation and Call for Evidence on reforming the producer responsibility system for waste electrical and electronic equipment
Date:	12th March 2024
Reporting Officer:	Cathy Matthews Operations Director, Resources and Fleet
Contact Officer:	John McConnell City Services Manager Resources and Fleet

Restricted Reports				
Is this report restricted?	**Yes**		**No**	X
If Yes, when will the report become unrestricted?				
After Committee Decision				
After Council Decision				
Some time in the future				
Never				

Call-in				
Is the decision eligible for Call-in?	**Yes**		**No**	

1.0	**Purpose of Report or Summary of main Issues**
1.1	To provide the Committee with the proposed Belfast City Council responses to the recently published Consultation and Call for Evidence on reforming the producer responsibility system for waste electrical and electronic equipment.
2.0	**Recommendations**
2.1	The Committee is asked to approve the proposed responses to the Consultation and Call for Evidence on reforming the producer responsibility system for waste electrical and electronic equipment.
3.0	**Main report**
3.1	<u>Key Issues</u> At the Committee meeting held on 6th February 2024, members were presented with the

	DEFRA Consultation and Call for Evidence (launched on 28th December 2023) on reforming the producer responsibility system for waste electrical and electronic equipment.
3.2	Whilst producer responsibility and waste policy are devolved matters, there will be a continued UK wide approach to WEEE Extended Producer Responsibility (WEEE EPR). Accordingly, this consultation was undertaken jointly by all four administrations.
3.3	In Northern Ireland, the outcome of the consultation will inform decisions of the Minister for Agriculture, Environment and Rural Affairs.
3.4	The consultation document is attached as Appendix 1 and the Impact Assessment as Appendix 2.
3.5	The consultation presents reforms to the Waste Electrical and Electronic Equipment Regulations 2013, which are intended to drive up levels of separately collected WEEE for re-use and recycling.
3.6	The reforms aim to ensure that producers and distributors of electrical and electronic products finance the full net cost of collection and proper treatment of products that end up as waste. The proposed reforms are also intended to support the drive towards a more circular economy by ensuring products are designed to have a lower environmental impact than those which are currently consumed and also to ensure products stay in use for longer.
3.7	The consultation document includes proposals to: - introduce a UK-wide household waste collection system for both small and bulky items. This would be largely financed by the importers and manufacturers of such equipment. Householders would still be able to take unwanted electricals to their local household waste and recycling centre. - ensure that sellers have an obligation to take away an old appliance, at no additional charge and if requested to do so, where a replacement large appliance, such as a fridge, is delivered to a household. - strengthen the existing take-back obligations placed on large retailers to enable easy drop off with them of unwanted items. - place an obligation on online sellers. In these instances, producers would continue to finance the costs of proper treatment, recycling or preparation for re-use of items that are collected by retailers and online sellers. - place new obligations on Online Market Places. - ensure producers of vapes properly finance recycling costs when they become waste.
3.8	Within the consultation, the policy proposal of particular interest to Belfast City Council is: *Increasing collections of waste electrical and electronic equipment from households,* where producers of electronic and electrical products are to be responsible for financing kerbside collections of small household WEEE, with an obligation placed on producers to fund separate household waste collections, potentially delivered by integration with existing kerbside collection services provided by local authorities.

3.9	It is anticipated that the service might take the form of a regular collection round. Views on the frequency of such a round, in order to balance impact against efficiency, are sought as well as whether a service could be delivered via an “on demand” approach, a regular collection round or potentially a mix of approaches in different areas.
3.10	It is also envisaged that a producer-led Scheme Administrator would be necessary to carry out the functions required to rollout a UK-wide household collection service on behalf of producers and to be responsible for negotiating contracts with delivery partners such as local authorities and waste management companies and collecting necessary funding from producers or their PCSs and views on this are sought.
3.11	Within this section, views are also sought on: - how small WEEE should be defined, for example, by weight or dimension; - whether or not there are any products that could generate risks from being included in a household collection arrangement; - the options and costs for a kerbside service delivered by local authorities which are outlined in the Impact Assessment; and - a proposal that producers would have an obligation to finance the cost of bulky waste collection services for WEEE that is typically provided by local authorities, on request, (in some councils, this is provided as a chargeable service.) The obligation would be to provide a free of charge service to households on request, for WEEE too large to be collected via a future collection service for smaller items.
3.12	Within Belfast City Council’s draft response to the consultation document, we are supportive of the proposals for producers to finance WEEE kerbside collections. However, from a council perspective, rolling out such a scheme (to incorporate small WEEE into kerbside collections) will require careful operational planning, implementation, and delivery.
3.13	We request that government give full consideration to the complete supply chain and propose how best to apply the Waste Hierarchy in order to promote WEEE repair and reuse as more favourable options over recycling. We support the proposal for a separate category for vapes, based on their properties and the potential safety issues associated with these items.
3.14	Alongside this consultation document, DEFRA has also published a call for evidence, setting out wider areas for reform in which detailed proposals and an accompanying impact assessment have yet to be developed. Additional evidence and views are sought, to assist further policy development ahead of consulting on formal UK-wide proposals supported by a full assessment of costs and benefits.
3.15	The “call for evidence” generally centres around the allocation and targets for the Producer Compliance Scheme and also seeks specific evidence which Belfast City Council does not hold. The main focus of our draft response is in relation to activities for which producers should finance including dealing with residual, fly tipped and littered WEEE waste. We request consideration to incentivising PCS to promote reuse over recycling which would affect schemes such as Belfast City Council’s IT ReUse and would likely have a better environmental outcome. We also note that potential changes to requirements around business-to-business WEEE recycling may have an effect on business WEEE that sometimes ends up at Council facilities (for example fly tipped commercial fridges being brought to our Waste Transfer Station.)
3.16	It is proposed that the reforms will be phased in, starting potentially as early as next year with measures being implemented on online marketplaces, free collection of large domestic

	appliances by retailers on delivery of a new item and the introduction of a new EEE category for vapes.
3.17	The start of the rollout of the household collection system, is anticipated from 2026, along with the other measures set out in the consultation document. It is expected that policy proposals arising from the call for evidence will be phased in over a longer timeframe.
3.18	This package and the subsequent government response should be taken as a review and report of the Waste Electrical and Electronic Equipment Regulations 2013 as required under Regulation 93.
3.19	The closing date for responses to the Consultation and Call for Evidence is 7 March 2024. It is proposed to forward our draft comments to DEFRA by this date and to confirm Committee and Council approval or any required amendments retrospectively.
3.20	The full consultation and impact assessment are attached as Appendix 1 and 2. The Call for Evidence, is attached as Appendix 3
3.21	Belfast City Council's draft response to the consultation is attached as Appendix 4. Belfast City Council's draft response to the Call for Evidence is attached as Appendix 5
3.23	**Financial & Resource Implications** None in relation to responding to the consultations.
3.24	**Equality or Rural Needs Implications** None in relation to responding to the consultations.
	Abbreviations DEFRA - Department for Environment, Food and Rural Affairs EEE - Electrical and Electronic Equipment EPR - Extended Producer Responsibility PCS - Producer Compliance Scheme WEEE - Waste Electrical and Electronic Equipment
4.0	**Appendices – Documents Attached** Appendix 1 – Consultation on reforming the producer responsibility system for waste electrical and electronic equipment Appendix 2 – Impact Assessment on reforming the producer responsibility system for waste electrical and electronic equipment Appendix 3 - Call for Evidence on reforming the producer responsibility system for waste electrical and electronic equipment Appendix 4 – Belfast City Council's draft response to the Consultation on reforming the producer responsibility system for waste electrical and electronic equipment Appendix 5 - Belfast City Council's draft response to the Call for Evidence on reforming the producer responsibility system for waste electrical and electronic equipment

Department for Environment Food & Rural Affairs

Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Llywodraeth Cymru
Welsh Government

Scottish Government
Riaghaltas na h-Alba

Consultation on reforming the producer responsibility system for waste electrical and electronic equipment

Date: 28 December 2023

We are the Department for Environment, Food and Rural Affairs. We are responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.

This publication is available at www.gov.uk/government/publications

Any enquiries regarding this publication should be sent to us at

weee@defra.gov.uk

www.gov.uk/defra

Contents

Executive summary

Introduction

The United Kingdom is committed to protecting the environment. We all want to make:

- our air purer
- our water cleaner
- our land greener
- our food more sustainable
- our resources more efficiently managed

We want to restore and enhance the environment for the next generation, leaving it in a better state than we found it. A key part of the success of these ambitions will be how we tackle waste.

The Resources and Waste Strategy for England sets out how we will preserve our stock of material resources by:

- minimising waste
- promoting resource efficiency
- moving towards a circular economy, where materials are kept in use for longer

As well as detailing Defra's firm commitments and actions over the coming years, the strategy also provides clear, long-term direction for policy which is reflected in the Environmental Improvement Plan 2023 for England.

Wales has achieved some of the highest municipal recycling rates globally. Its strategy 'Beyond Recycling' sets out a number of key actions to achieve the objective of zero waste and net zero carbon emissions by 2050. These actions focus on changing how we use resources including promoting:

- re-use
- repair
- remanufacture
- recycling

The Scottish Government's circular economy strategy, 'Making Things Last', published in 2016, sets out a clear vision and priorities for action to move towards a more circular economy. In this it set a series of ambitious targets to drive circularity. To ensure the necessary legislation is in place, the Scottish Government introduced the Circular Economy (Scotland) Bill in June 2023. This will help with the development of an economy which:

- reduces demand for raw materials
- designs products to last as long as possible
- encourages re-use, repair and recycling

In Northern Ireland, the draft Circular Economy Strategy for Northern Ireland was published in early 2023. Rethinking our use of resources is an essential part of tackling climate change and achieving net zero. The Department of Agriculture, Environment & Rural Affairs of Northern Ireland (DAERA) has also committed to publish a new waste management strategy for Northern Ireland. This strategy will set the policy direction for the future management of waste, through a range of actions and targets over the next 6 years.

This is a joint consultation between the UK Government, Scottish Government, Welsh Government and Northern Ireland Executive.

Net Zero

In 2019, the UK became the first major nation to legislate for **net zero** carbon emissions by 2050, with Scotland setting a legally binding target for 2045. This means that governments must shape policies and regulations that influence the transition of the whole economy towards net zero.

The UK Government, Scottish Government, Welsh Government and Northern Ireland Executive are committed to reducing electronic waste to cut carbon emissions. The resource extraction for, and manufacturing of, electronic products contribute to more than 50% of their lifetime of CO2 emissions. The rise in purchases of electronic goods is a significant driver of emissions globally. By 2040, on current trends, it is estimated that worldwide emissions from the production and use of electronics could rise to a level exceeding half that associated with the global transportation sector today.

Residual waste

Residual waste is waste that is not collected separately for recycling. The UK Government has set a legally binding target to reduce residual waste (excluding major mineral wastes) per capita in England by 50% by 2042 relative to 2019 levels. This will see residual waste drop from 574kg per person in 2019 to 287kg in 2042. Along with the government's forthcoming Collection and Packaging Reforms, the reforms to the producer responsibility regime for waste electricals will be key to achieving this target. This will be realised through policies which will increase the convenience and availability of collections of waste electrical and electronic equipment (WEEE) for householders and reduce the amount of WEEE which is inappropriately disposed of in residual waste.

Extended producer responsibility (EPR)

The current system for collection and proper treatment of (WEEE is based on 'collective producer responsibility'. Producers of electrical and electronic equipment (EEE) contribute financially based on their market share in specified equipment categories. Household WEEE is collected separately, primarily via household waste and recycling centres, with producers financing the cost of collection and proper treatment since 2007.

While the collection of larger items such as washing machines and fridges is generally working well, a recent study shows that an estimated 155,000 tonnes of smaller household WEEE is thrown in residual waste bins each year, highlighting the need for more to be done to tackle this issue.

A recent study on public attitudes and behaviours found that around 86% of people think that it is worth recycling and taking the time to do properly. However, it also showed that many are unaware of, or have difficulty accessing, recycling points for WEEE.

We want your views on how we can make re-use and recycling WEEE easier by expanding the existing collections infrastructure to make it more convenient for the public and businesses to deal with their WEEE properly. We want the right incentives built into the system to support our wider circular economy ambitions, minimising the amount of EEE that becomes waste in the first place. We would like to extend these principles to WEEE that is produced by businesses and public sector organisations.

Principles for implementing an effective Extended Producer Responsibility System

The following core principles will act as a framework for reviewing existing producer responsibility schemes and developing new schemes and will apply as appropriate:

1. **Clear outcomes, objectives, targets and responsibilities** are set for each EPR scheme to support long term planning investment, and research and development by producers in specified sectors and the resource management sector.
2. **Producers to cover the full net cost of managing their products at the end of their life** including impacts on the environment and society so that objectives and targets are met.
3. **Modulated fees or other measures** are used to encourage producers to make more sustainable design, production and purchasing decisions in line with the waste hierarchy and our resources and waste priorities. For example, producers may pay a lower fee for products which are easy to re-use, repair or recycle and a penalty for those that are not.
4. Schemes are designed and implemented to make it **easy for consumers to play their part** whether through their choices at point of purchase, during ownership of a product, or at the end of its life.

The following principles underpin how we expect the EPR schemes to be organised. They will apply as appropriate to reformed and future EPR schemes:

5. **All producers are expected to pay into the system** either directly or through the price they are charged by others in the supply chain, in line with the 'polluter pays' principle. These payments will be proportionate and without unnecessary administrative burden.
6. Appropriate measures are put in place in each part of the United Kingdom to increase transparency of markets, target setting and costs, in order to drive efficiency and reduce waste crime along the value chain and ensure **costs to producers are fair, necessary and transparent**.
7. **Government will support measures relevant to a scheme's targets and objectives and ensure that costs to Local Authorities are met where appropriate.**
8. EPR measures should **complement other policy measures** which aim to achieve similar outcomes (such as product standards, resource efficiency criteria and landfill tax).
9. **Appropriate governance, compliance and enforcement arrangements** will be decided for each individual scheme, as not all products or materials will benefit from the same approach. These will, however, need to enable delivery of the principles set out above.

We want to measure the success of the new WEEE EPR Scheme in each part of the United Kingdom. We consider that whatever measures of success are adopted for the scheme, there should be a presumption in favour of incorporating drivers providing parity of performance on a nation-by-nation basis (for example where appropriate, setting nation level targets). We must also ensure that any additional metrics we use for measuring the performance of the system can be broken down on a nation-by-nation basis. We want to see data and reporting at a more local level so we have a better picture of how the system is performing and can target appropriate interventions in areas where there may be low levels of performance.

Purpose of this consultation

The purpose of this consultation is to seek views on reforms to the Waste Electrical and Electronic Equipment Regulations 2013, which are intended to drive up levels of separately collected WEEE for re-use and recycling. We want to ensure producers and distributors of electrical and electronic products finance the full net cost of collection and proper treatment of products that end up as waste. The proposed reforms will also support the drive towards a more circular economy by ensuring products are designed to have a lower environmental impact than those which we consume today and to ensure products stay in use for longer.

Research indicates that lack of convenience and awareness are both key inhibitors to driving higher collections. What is convenient for one person may be less so for another. Order from an online seller and you can often have goods delivered to your home or you can pick up from a collection point. Our proposals offer a similar choice when the products we consume become waste.

It is proposed to introduce a UK-wide household waste collection system for both small and bulky items. That will be largely financed by the importers and manufacturers of the equipment we consume. However, where a replacement large appliance, such as a fridge, is delivered to your home we propose the that the seller should have an obligation to take away the old appliance, if requested to do so, at no additional charge.

But we recognise that a home collection service may not suit every circumstance. Storage for example could be an issue for those with limited space. So householders will still be able to take unwanted electricals to their local household waste and recycling centre. We are also proposing to strengthen the existing take-back obligations placed on large retailers to enable easy drop off with them of unwanted items. A similar obligation would apply to online sellers. In these instances, producers would continue to finance the costs of proper treatment, recycling or preparation for re-use of items that are collected by retailers an online sellers.

In addition, we set out proposals to place new obligations on Online Market Places. Finally, we want to ensure producers of vapes properly finance recycling costs when they become waste. All these proposals are supported by an accompanying impact assessment. Separate impact assessments have also been carried out by Scottish Government.

Our proposals on vapes complement those set out in Creating a Smoke Free Generation and Tackling Youth Vaping, published in October 2023. It proposes action the government will take to tackle smoking and youth vaping. It explores proposals to restrict the sale and supply of disposable vapes. Creating a smokefree generation and tackling youth vaping: your views consultation is live and closes on December 6.

Alongside this consultation document, we have also published a call for evidence. The call for evidence sets out wider areas for reform in which detailed proposals and an accompanying impact assessment have yet to be developed. Nevertheless, we have set out some specific areas on which we would welcome additional evidence and views to assist further policy development ahead of consulting on formal UK-wide proposals supported by a full assessment of costs and benefits. Taken together, the proposals set out in this consultation and those in the call for evidence represent our intentions for WEEE reform.

The various ideas in the call for evidence will need further development and consultation before they can be implemented. This means that not all the reforms will be made at the same time. Indeed, it is envisaged that reforms will be phased starting potentially as early as next

year with measures on online marketplaces, free collection of large domestic appliances by retailers on delivery of a new item and the introduction of a new EEE category for vapes, which are discussed in this consultation document. The start of the rollout of the household collection system is anticipated from 2026, along with the other measures sets out in this consultation document. It is anticipated that policy proposals arising from the call for evidence will be phased in over a longer timeframe.

This package and the subsequent government response should be taken as a review and report of the Waste Electrical and Electronic Equipment Regulations 2013 as required under Regulation 93.

Geographical extent and definitions

Producer responsibility and waste policy are devolved matters. The UK Government (acting for England) the Scottish Government, the Welsh Government and the Northern Ireland Executive have agreed to continue with a UK-wide approach to WEEE Extended Producer Responsibility. Accordingly, this consultation is being undertaken jointly by all four administrations.

In Northern Ireland, the outcome of this consultation will inform decisions of an incoming Minister for Agriculture, Environment and Rural Affairs, or in the absence of a minister, those decisions that can be taken under the Northern Ireland (Executive Formation etc) Act 2022. This applies to all proposals in the consultation document. Where reference is made in this document to the UK Government in relation to matters of devolved policy, it is the UK Government acting for England. This document and descriptions of existing law therefore relate to England, Scotland, Wales and Northern Ireland.

References to Ministers are references to Ministers of each administration. Reference to 'the regulator' or 'regulators' are references to the Environment Agency (EA), the Northern Ireland Environment Agency (NIEA), Natural Resources Wales (NRW) and the Scottish Environment Protection Agency (SEPA) unless stated otherwise.

Reference to "Local Authorities" includes district councils in Northern Ireland.

Audience

Responses to this consultation are welcomed from:

- businesses involved in the design, production and specification of electronic and electrical products
- businesses who manufacture electronic and electrical products and who place these products on the UK market
- retailers, online marketplaces and importers of electronic and electrical products
- Electronics Producer Compliance Schemes
- organisations involved in the re-use sector
- organisations involved in the management and recycling of electronic waste including Local Authorities, waste management companies, brokers, dealers, carriers exporters, and re-processors
- other organisations such as professional and membership organisations, Non-Governmental Organisations, consultants and charitable organisations who have an interest in how electronic waste is managed in the UK

- members of the public

Responding to the consultation

Please respond to this consultation in one of the following ways:

Online using the Citizen Space consultation hub.

For ease of analysis, responses via the Citizen Space platform would be preferred, but alternative options are provided below if required:

By email to weee@defra.gov.uk

Written responses by post to:

Consultation Coordinator,
Defra 2nd Floor, Foss House,
Kings Pool 1-2 Peasholme Green
York
YO1 7PX

Please note, any responses sent by post must have arrived at the above address by the closing date of the consultation to be counted. Unfortunately, we cannot analyse any responses received after this date. To ensure your response is included in the analysis, please consider responding online via Citizen Space.

Defra is managing the consultation process on behalf of the UK, Scottish and Welsh Governments and the Department for Agriculture, Environment and Rural Affairs in Northern Ireland.

The Scottish and Welsh Governments will have access to the consultation responses provided via the Citizen Space consultation hub. If you would like to send a copy of your consultation response to the Scottish and/or Welsh Governments, then please send by email to:

Scotland: producerresponsibility@gov.scot

Wales: ResourceEfficiencyAndCircularEconomy@gov.wales

If you are responding from Northern Ireland please ensure a copy of your response is also sent to: EPRTeam@daera-ni.gov.uk

Duration

This consultation will run from Thursday 28 December 2023 and closes on Thursday 7th March 2024.

After the consultation has closed

A summary of the responses to this consultation and the Government response will be published and made available on Government websites at www.gov.uk/defra, www.daera-ni.gov.uk, www.gov.scot and www.gov.wales

The summary will provide a list of organisations that responded but will not include personal names, addresses or other contact details. Information provided in response to this consultation document, including personal information will, however, be shared with the Scottish Government, Welsh Government and Northern Ireland Executive. It may also be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes for example, the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018.

If you would like any information, including personal data you provide to be treated as confidential, please say so clearly in writing when you submit your response to the consultation and explain why you require these details to be kept confidential.

If we receive a request for disclosure under the FOIA, we will take full account of your explanation, but due to the law we cannot provide an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as a confidentiality request.

Defra is the data controller in respect of any personal data that you provide. Defra's Personal Information Charter gives details of your rights in respect of the handling of your personal data.

Compliance with consultation principles

This consultation is being conducted in line with the Consultation Principles set out in the Better Regulation Executive guidance which can be found at: https://www.gov.uk/government/publications/consultation-principles-guidance

If you have any comments or complaints about the consultation process, please address them to: By e-mail: consultation.coordinator@defra.gov.uk

Or in writing to:

Consultation Co-ordinator,
Defra 2nd Floor, Foss House,
Kings Pool 1-2 Peasholme Green
York
YO1 7PX

Questions about you

A wide range of businesses, organisations and individuals are involved with or take an interest in electricals and managing waste electricals. The questions below are intended to grasp this diversity and put your responses in perspective with those of other respondents.

1. What is your name?

2. What is your email address?

This is optional, but if you enter your email address you will be able to return to edit your consultation response in Citizen Space at any time until you submit it. You will also receive an acknowledgement email when you submit a completed response.

3. Which of the following best describes you?

Please provide the name of the organisation, institution or business you represent and the approximate number of staff it employs. Please choose one option. If multiple categories apply, please choose the one which best describes the organisation you are representing in your response.

- 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

4. Would you like your response to be confidential?

   Answer Yes or No

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

Policy proposals

1. Increasing collections of waste electrical and electronic equipment from households

Background

Local Authorities choose to register their household waste and recycling centres (HWRCs) and waste transfer stations as a designated collection facilities (DCFs) under the WEEE Regulations. If they are registered as a DCF, they are required to make on-site provision for the separate collection of:

- large domestic appliances
- TVs and computer monitors
- fridges and freezers
- lamps
- solar panels
- all other household equipment

Producers, via membership of a Producer Compliance Scheme (PCS), are obligated to finance the cost of collection and proper treatment of WEEE that is deposited at HWRCs. This is likely to be WEEE directly deposited by householders but will also include WEEE collected via bulky waste collections, bring banks (as defined in the glossary) or through kerbside collection services. The cost of collection and proper treatment of any fly-tipped household WEEE that has been recovered by Local Authorities and taken to a HWRC would also be met by a PCS. Producers who place less than 5 tonnes of EEE on the UK market per year are exempt from these financial obligations and simply need to report annual placed on the market data to their environmental regulator.

86 Local Authorities provide a kerbside collection service for small items of electrical waste. However, for most householders, their local HWRC is the only Local Authority facility provided for recycling of WEEE. Chargeable bulky waste collection services are available to residents for large WEEE such as washing machines or fridges. Although Wales recognises the role that kerbside collection can play, it will come forward with proposals for the establishment of re-use and recycling hubs for the collection of electrical items and will consider how this can be supported by WEEE collection including from the household.

Case for change

The UK needs a robust waste collection infrastructure which makes it easier for householders to recycle or dispose of their unwanted equipment. At present, householders can return WEEE free of charge to their local HWRC. A total of 309,360 tonnes of WEEE was collected at HWRCs and Local Authority waste transfer stations in 2019.

However, we must make it more convenient for householders to dispose of unwanted electricals – particularly small items that are simply thrown in the bin. 2020 research indicates that 155,000 tonnes of WEEE is disposed in residual waste annually. In 2019 to /2020, of 976,000 fly-tipping incidents, 5% included “white goods” and 1.5% other equipment.

A significant amount of unwanted equipment is hoarded by householders, meaning there is a loss of resources embedded in those products. A nationally representative survey of UK adults from the Royal Society of Chemistry and Ipsos Mori also sheds light on the amount of redundant and unused equipment which is stored by householders, with 51% of respondents indicating that they had at least one item of unwanted equipment in their home and 45% having between two and five items.

We believe it is essential to expand the existing household waste collection infrastructure across the United Kingdom to include free of charge collections of small WEEE and bulky WEEE from the home. This will bring a new level of convenience to householders that we believe will drive behaviour change leading to higher levels of recycling. We will put in place other measures for re-use and will ensure effective communications to drive consumers towards re-use routes for equipment which is still functioning.

We want to explore options for a UK-wide household collection system for WEEE financed and led by producers. We consider that delivery of this service is likely to be best met through a producer-led Scheme Administrator. This Scheme Administrator would need to meet certain criteria set down by government. The assumption is that the Scheme Administrator would deliver this by contracting with Local Authorities and their service providers but this would ultimately be decided by the producer-led body. It is not proposed to in this consultation to mandate local authorities to establish a household collection service for WEEE nor to regulate on the precise manner in which householders will be required to present their WEEE to the producer financed collection system. A household WEEE collection service does not necessarily require a separate receptacle as demonstrated by some councils who already offer a service that simply requires small electricals to be placed in a used carrier bag.

Such an approach should focus upon dual incentivisation, on the part of producers and Local Authorities to ensure that both parties deliver. The assessment of producers' obligations should reflect good practice and reasonable benchmarks of costs and performance of comparable areas of the country. Subject to putting in place a similar producer obligation for the collection of portable batteries from the household, we consider this Scheme Administrator approach would also be appropriate in that instance. It should be noted, however, that will be considered under the separate batteries consultation which is scheduled to follow in 2024.

Costs and approach will vary in different areas so arrangements and apportionment of costs to producers must reflect the human and physical geography of local areas, including but not limited to levels of deprivation, rurality and dwelling type. A key principle must be to ensure that WEEE is collected from all households throughout the UK, not just in areas which are the most profitable or least costly.

As indicated above, producers who place less than 5 tonnes of equipment on the UK market annually are exempt from these PCS financial obligations. We would welcome views on whether this 5-tonne threshold is still appropriate.

Communications

Effective communications, funded by producers, about the provision of household collection services for small WEEE and bulky waste services collecting large WEEE will be essential if we are to drive up collection levels. In line with the waste hierarchy, communications should emphasise the benefit of re-use and re-use options where possible. Communications should also include advice on what to do with data embedded devices. We welcome further evidence on the likely cost of delivering that message effectively across the UK.

Our proposals for increasing collections of waste electrical and electronic equipment from households

- **Proposal 1.1:** For producers of electronic and electrical products to be responsible for financing kerbside collections of small household WEEE

The proposal moves the point of producer responsibility from the local authority household waste and recycling centre to the home. Local Authorities already provide householders with waste and recycling collection services. The proposal would place an obligation on producers to fund separate household waste collections. The costs and benefits set out in the accompanying impact assessment assume that producers, via the producer-led Scheme Administrator, would seek to deliver the service by integration with existing kerbside collection services provided by Local Authorities. But we do not propose constrain producers on th delivery partners they must work with or that local authorities be mandated to separately collect WEEE. We therefore welcome your views on whether other alternative approaches delivered and financed for producers via a Scheme Administrator might provide better value for money whilst crucially providing equal convenience to the householder as that which could be provided by Local Authorities.

We envisage that the costs of establishing and operating the service would be financed by producers and delivered through a Scheme Administrator. We anticipate such a service should take the form of a regular collection round but welcome views on the frequency of such a round in order to balance impact against efficiency. We also welcome views on whether a service could be delivered via an “on demand” approach, a regular collection round or potentially a mix of approaches in different areas.

We want your views on how small WEEE should be defined, for example, by weight or dimension. We would also like to know whether or not there are any products that could generate any risks from being included in a household collection arrangement.

A report commissioned by Material Focus sets out the options and costs for a kerbside service delivered by Local Authorities which form the basis of our Impact Assessment.

We believe the financial obligation should rest with producers of household equipment and any distributors that do not provide their own take-back services for unwanted equipment (see **chapter 2 on distributor obligations**). Those obligations should recognise geographic disparities particularly prominent in servicing rural areas, including the Highlands and Islands of Scotland. Geographical factors must be considered to ensure all types of rural Local Authorities are compensated fairly for costs beyond their control.

We envisage that a producer-led Scheme Administrator would be necessary to carry out the functions necessary to rollout a UK-wide household collection service on behalf of producers. Such a body would for example be responsible for negotiating contracts with delivery partners such as Local Authorities and waste management companies and collecting necessary funding from producers or their PCSs. We welcome views on the period of time such a body would require to put in place a household collection service across the UK. See **Chapter 5 on our proposals to establish a new Scheme Administrator.**

- **Proposal 1.2:** For producers (and distributors that do not provide take-back services) of equipment to finance bulky waste collections for householders for large items of WEEE.

We propose that producers have an obligation to finance the cost of bulky waste collection services for WEEE that is typically provided by Local Authorities, on request, often as a chargeable service. The obligation would be to provide a free of charge service to households on request, for WEEE too large to be collected via a future collection service for smaller items described under Proposal 1.

As with the obligation to provide a household collection service for small WEEE we envisage that partnerships with Local Authorities (or other local service providers) are in many cases likely to be the most cost effective and efficient way for producers to fulfil this obligation and such an approach is reflected in the accompanying impact assessment. Such an approach is likely to bring efficiencies particularly where householders have a number of other, non-WEEE bulky items to discard (for example, furniture). However, it is not proposed to constrain producers on the delivery partners they work with.

Any producer-led Scheme Administrator is likely to have a key role to play in discharging the obligation set out in this proposal and would likely play a similar role to that envisaged for meeting the household collection obligation for small items of WEEE, as outlined under proposal 1.

Questions

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

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

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

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

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.

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

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

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?

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

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

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

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

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 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

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

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?

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

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

23. Are there are 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?

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?

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

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

2. Increasing distributor collections infrastructure

Background

A distributor is any person in the supply chain who makes an item of equipment available on the market. There are two types of distributors that we will discuss - retailers (those who sell household equipment and have at least one physical store) and internet sellers who provide household equipment via an online channel. Distributors already have obligations in relation to the take-back of unwanted equipment from householders. These are to:

- provide a free one-for-one take-back service for unwanted equipment from householders on the purchase of a new item with a similar function;
- provide free take-back of very small equipment if their store sales area is more than 400m2
- provide customers with information about the role of retailers and internet sellers in the take-back of electrical items and options available to the customer for the recycling of their unwanted WEEE.
- require retailers to keep a record of the amount of WEEE they collect from private households.

Under the current system, many retailers and internet sellers can discharge their obligations by joining the Distributor Takeback Scheme (DTS) as an alternative to providing take-back facilities themselves. This scheme has raised over £13 million from retailers and internet sellers since 2007 and has provided £9 million of funding to Local Authorities to establish separate collection facilities for WEEE at household waste and recycling centres and £1 million of subsequent site maintenance funding. The remaining £3 million supports local projects aimed at driving higher levels of re-use and recycling.

Case for change

Chapter 1 sets out our proposals to establish a producer-financed, free of charge household collection system for both small and bulky WEEE. However, government believes there remains a compelling case for strengthening the existing distributor takeback obligations placed on retailers and online sellers. Convenience is a key inhibitor to driving increased collections. What is convenient for one person maybe less so for another. What our proposals seek to deliver is choice. Households in future will be taking drinks containers to the supermarket to reclaim deposits under the proposed deposit return scheme. For some people returning a broken toaster at the some time may be convenient. Others will choose to access the household collection service.. If a householder has a bulky item such as a fridge delivered, requiring the seller to take away the unwanted fridge whilst at the home is the most efficient and convenient way of taking that item away for reuse or recycling.

The design and development a system producer financed household collection across the UK will take time to implement. In the meantime, we want strengthen existing retailer obligations under the current regulations to capture more WEEE from householders. This chapter outlines a number of proposals designed to do this, which are capable of being delivered on a UK wide basis more quickly. Once the household collection system described in chapter 1 is in place, we will review the relationship between that and the retailer obligations as part of a statutory post implementation review.

The UK has one of the lowest collection rates from retailers and internet sellers in Europe. Research[6] indicates that the UK is currently the only country in Europe that provides an alternative to retailers and internet sellers from providing take-back facilities themselves.

There is evidence that mandating retailers to offer a free of charge, physical take-back service can have benefits in terms of increasing collections, given their proximity to householders, particularly where that is supported by effective communication to consumers.

Research by Ipsos Mori has shown that convenience plays a large factor in ensuring householders discard of their unwanted electrical items properly and 42% of consumers surveyed said they would use collection points at supermarkets, 48% in petrol stations and other shops if they were available. Several countries, including Germany, Belgium and Ireland, already have more comprehensive requirements for retailer take-back than European legislation requires, with free take-back on delivery of new products and take-back of small items in store without the requirement to purchase a similar item. Research shows that retailer take-back has been shown to be most effective in countries where there is a strong emphasis on communications campaigns, such as in France and the Republic of Ireland.

Since January 2021, the government has required large retailers, with an annual turnover of £100k of electrical sales or more, to provide in store take-back on a one-for-one, like-for-like basis on the sale of a new item. Those retailers are no longer able to fulfil their obligations via membership of the DTS. Online only retailers and small retailers with an annual turnover of less that £100k per annum can continue to fulfil their obligations by membership of the current DTS. We want to consider further options for increasing collections through retailers and online

Retail take-back systems will often ensure unwanted items are handled in a similar fashion to new equipment and are not exposed to the elements as is typical at household waste and recycling centres. This leads to an increase in the re-use potential of unwanted equipment and so supports our drive towards a circular economy. The value of re-usable material is already recognised by major retailers who often have strategic relationships with partner organisations for the supply of equipment that has re-use potential thus prioritising re-use over recycling.

Kitchen retail is a significant channel for sale of large domestic appliances which results in large numbers of waste appliances. Anecdotal evidence suggests a lot of these waste appliances are not returned into the producer financed WEEE system. Currently the supplier or installer may not have an obligation to take-back the old appliance, leading to the discarded item not being captured by the existing WEEE Regulations and a high risk of inappropriate treatment. Our proposals seek to address this issue.

Our proposals for increasing distributors collections infrastructure

- **Proposal 2.1:** for internet sellers and retailers to 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.

Large appliances are usually delivered to the customer's home irrespective of whether the item was purchased in store or online. Retailers and internet sellers will offer to take an old appliance away for a supplementary charge. That charge acts as a disincentive to some consumers to ensure an unwanted item is properly recycled. We therefore propose to mandate that no charge can be made by the retailer or internet seller for the provision of this service. This obligation would apply to any retailer or internet seller who provides equipment directly to the customer's home.

We would welcome your views on whether some flexibility should be built into the requirements recognising that items may need to be disconnected or emptied (for example, a freezer) and so may not be ready for collection at the same time as delivery of the new item. There might also be circumstances when the delivery vehicle may not have sufficient spare capacity to take the old appliance away at the point of delivery.

We propose ensuring this obligation also applies to kitchen retailers, online sellers and warranty providers. The UK Government is committed to consulting by 2026 on the extent such an approach might also be extended to the furniture, mattress and soft furnishings sectors.

Our research indicates that at least one major retailer's collection on delivery service also includes the opportunity for householders to hand over small items of WEEE as well as their old appliance. We would welcome your views on whether to mandate that requirement.

- **Proposal 2.2:** for internet sellers with a turnover of over £100k of electrical sales each year to offer take-back of unwanted equipment on a one-for-one, like-for-like basis.

The intention here is to provide parity with the one-for-one, like-for-like take-back obligation that currently applies to retailers. The service should be of at least equivalent convenience to that currently provided by businesses selling via physical stores. This could for example be offered via a collection on delivery service, access to local drop off points, a system of pre-paid or refundable returns akin to that provided for return of unwanted purchases. We welcome views on how this should apply to those companies selling via online marketplaces and/or fulfilment houses.

This proposal would be in addition to the obligation outlined in Proposal 1 where they are required to offer free collection on delivery for large items. We welcome your views on the extent to which this obligation should apply to fulfilment houses and/or online marketplaces where they are used by the distributor.

We welcome your views on how distributors should be defined in this provision recognising that we want obligations to be fairly applied across different types of distributors. For example, distributors who sell the majority of their goods online, but also having one or more physical stores should not be able to meet their collection obligations at those stores alone. We would also like views on whether obligations should rest with the relevant fulfilment house or online marketplace where the product has been supplied from overseas, with no UK based distributor.

- **Proposal 2.3:** for retailers with a turnover of over £100k of electrical sales each year to provide free takeback of unwanted electrical equipment in store without the need to purchase a new item (0:1 takeback).

This obligation would only apply to those retailers who already have to offer a one-for-one, like-for-like take-back service, as of January 2021. This threshold reflects that currently applied to businesses that must provide in-store take-back and cannot meet their obligations by membership for the Distributor Take-back Scheme. We would welcome evidence on whether this is an appropriate break point.

Whilst the obligation to provide a take-back service would not be linked to the purchase of a new item, we would welcome your views on whether the retailer should only be obliged to take-back the item if they sell the same type of item in store. Such an approach could make

the obligation clearer for both retailers and consumers and would be easier to communicate. It would avoid a scenario, for example, where a specialist electrical store only selling lighting products would be required to take-back a toaster. We also welcome views on whether the obligation should be subject to "reasonable limits" on the amount of WEEE any householder would be permitted to take-back to a retailer. This might mean that the customer is only allowed to bring back a certain number of items at any one time. Introducing this new obligation would bring about a substantial increase in available WEEE collection points thereby increasing consumer choice and convenience. It would bring greater consistency with the existing takeback obligations for batteries under the Waste Batteries and Accumulators Regulations 2009.

Such a requirement might be challenging for internet sellers, fulfilment houses or online marketplaces to implement effectively. We would welcome your views on alternative obligations for internet sellers such as payment into a scheme, similar to the current Distributor Take-back Scheme.

- **Proposal 2.4:** for retailers and internet sellers to make customers aware of their disposal options for unwanted equipment at the point of sale

Communications will play an important part of successful delivery of the measures outlined in Proposals 1-3. Government believes retailers and internet sellers must ensure customers are aware of the various options available to them for disposing their unwanted equipment, including the retailer takeback obligations at the point they purchase a new product. The current obligation is only to "make information available" on demand. That information is often only made available upon request or is "lost" on a company's website. The information could for example be provided during a conversation at the time of sale, in the sale receipt or digital communication at the time of purchase.

- **Proposal 2.5:** to move the point of producer responsibility (via Producer Compliance Schemes) to the retailer's store, distribution centre or bulking point.

At present, the Producer Compliance Scheme (PCS) must allow distributors to deliver WEEE into their network. However, transporting WEEE to the PCSs nominated collection point could act as a considerable disincentive for the distributor to proactively seek to drive up collections from their customers.

This proposal would remove the cost to retailers of moving the WEEE to a re-use or recycling facility and would perhaps incentivise retailers to innovate to collect more. Such an approach would align with the point at which producer responsibility starts for WEEE deposited at HWRCs. The distributor would make an arrangement with a PCS to finance the collection of WEEE from their premises in much the same way as is currently the case from local authority HWRCs. It would bring greater alignment with the interface between distributor/producer obligations in the Waste Batteries and Accumulators Regulations 2009.

Questions

28. 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

29. 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

30. 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.

31. 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

32. 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

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

34. 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 ie 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

35. 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

36. 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

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

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

39. 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

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

41. 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 take-back scheme, be used to support increased levels of collections for re-use and recycling? Please select one of the following options:
    a. Agree
    b. Disagree
    c. Unsure

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

43. 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

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

45. 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

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

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

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

49. 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

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

51. How long will industry need 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

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

3. New producer obligations for Online Marketplaces and Fulfilment Houses

Background

UK sales of electricals through Online Marketplaces generate revenue equivalent to an 18% share of the entire UK eCommerce market. This can be attributed to the fact that leading distributors including retailers have expanded their internet presence in recent years as well as overseas players using the internet to access the UK market. Irrespective of whether the business has a UK presence they have a legal obligation as a producer under the WEEE Regulations to register with the relevant environment agency and join a PCS to meet their financial obligations.

Despite facilitating UK sales, Online Marketplaces and fulfilment houses presently have no obligations under the WEEE Regulations. It is the overseas seller that would be classified as both the producer and distributor and consequently have legal obligations under the regulations. Proposed changes to online distributors obligations are set out in Chapter 2. This chapter seeks to address reforms to existing producer obligations in relation to online market-places, fulfilment houses and their overseas sellers.

An Online Marketplace is a business using a website or mobile phone app (such as a marketplace, platform or portal) to handle the sale of goods to customers which meets all of the following conditions:

- in any way sets the terms and conditions on how goods are supplied to the customer
- is involved in any way in authorising or facilitating customers' payments; and

- is involved in any way in the ordering or delivering the goods, including but not limited to the arrangement or actual participation of either.

This definition of an Online Marketplace includes both businesses that sell goods that they own (for example, through a web-shop, an app store on mobile phones or other e-commerce portal) or is offering for sale goods owned by a third party.

A fulfilment centre is a business which stores any goods that meet all the following conditions:

- are owned by, or stored on behalf of, someone (third party) established inside or outside the UK
- offers services which are more than just storing a fully prepared product. These additional services could include but not be limited to managing orders from customers, picking and packing an order, inventory control, labelling products, arranging the transport and delivery of the product to a customer, and managing returns
- whether the goods are manufactured in the UK or were imported
- whether the goods are being offered for sale in the UK and have not been sold in the UK before.

This definition also applies if the goods are released into free circulation after being stored under a customs regime. This definition applies regardless of whether the fulfilment centre's physical location is based in the UK or not.

Case for change

The producer obligations set out in the WEEE Regulations are enforced by the environmental regulators of the four nations of the UK. Distributor obligations are regulated across the UK by the Office of Product Standards and Safety (OPSS). However, those regulators do not have any jurisdiction overseas. There is a high level of non-compliance amongst those online sellers that do not have a UK presence. They often use Online Marketplaces as the sales channel through which to place their products on the UK market. This means that UK registered producers are financing the cost of collection and proper treatment of a significant volume of EEE that is placed on the UK market by overseas sellers when it becomes waste. This creates an unlevel playing field between registered and unregistered producers. Some reports have estimated that as much as 46,000 tonnes of EEE is placed on the UK market each year by overseas sellers through Online Marketplaces and as a result the associated financial obligations for this EEE are not being met.

The Environmental Audit Committee report into WEEE and the circular economy noted this disparity and urged the government to tackle the issue.

Our proposals for new producer obligations for Online Marketplaces and fulfilment houses

The underlying principle in future will be that Online Marketplaces contribute to the financial obligations arising from EEE that is placed onto the market via their platforms. A new category of producer could be created for online marketplaces and potentially fulfilment houses. They would be required to meet producer obligations laid down in revised regulations on behalf of sellers based outside the UK. This would include the requirement to:

- register with a PCS
- submit data in relation to total amount of electricals placed on the market by their overseas sellers
- pay registration fees to the relevant environmental regulator

- meet their financial obligations through their membership of a PCS

It may be necessary for the current charging regimes for producers and PCSs to be reviewed to recognise that a new category of producer had been created with different compliance monitoring costs incurred by the regulator for that new category. The proposal is similar to that announced in the Government response to extending producer responsibility for packaging consultation. We want to explore the extent to which it might be necessary to initially allow platforms to provide estimated weight data using protocols agreed with the environmental regulators. This is because to require them to use actual data may be too onerous or burdensome and some online marketplaces may not practically be able to access data to the required granularity.

Questions

53. 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

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

55. 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

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

57. 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

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

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

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

61. What other ways, if any, should government explore to tackle the issue of non-compliance with the WEEE Regulations by online sellers?

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

4. Dealing with the environmental impacts of vaping products

Background

Vapes, also known as e-cigarettes, have been around since the early 2000s. Vapes are substantially less harmful than smoking because they do not contain tobacco, and therefore can be an effective tool in supporting smoking cessation.

Vapes were originally designed to be reusable meaning people could invest in a vape device and then refill and recharge for repeated use, however, there has been a recent increase in the use of single use (disposable) vapes amongst both adult vapers and children. The number of children using vapes has tripled in the past 3 years, with 20.5% of children trying a vape in March or April 2023.

In October 2023, government published a UK wide consultation: 'creating a smokefree generation and tackling youth vaping' exploring a number of wider actions to tackle youth vaping, including placing restrictions on the sale and supply of disposable vapes. Stakeholders with views related to youth vaping and specifically disposable vapes are encouraged to respond to the DHSC-led consultation. This consultation however is focused on ensuring manufactures and importers of all vaping products address the environmental impacts of those products when they become waste.

Case for change

Research from Material Focus suggests that around 0.5bn vapes are sold in the UK each year with significant numbers entering the residual waste stream annually. Vapes contain plastic, lithium and other rare earth elements meaning that if these products are not disposed of and recycled properly, there is a loss of critical resources. Vapes also contain lithium-ion batteries that can pose a fire risk if the waste is not managed appropriately. Ensuring that vapes are disposed of appropriately would therefore lead to numerous benefits to the natural environment.

This consultation and accompanying call for evidence sets out various measures which should help manage the environmental impacts of vaping products. Chapters 1 and 2 of this consultation describe proposals intended to drive increasing levels of collections of WEEE from the household through the establishment of new collection systems and enhanced distributor take back, supported by appropriate communications. This will make it easier for those who use vapes to make sure they are properly collected for recycling, whilst also ensuring more critical resources found in vaping devices can be salvaged and reducing the fire risk posed by lithium-ion batteries in residual waste.

In chapter 1 of our call for evidence we have also sought views on whether producers should finance the cost of the clean-up of commonly littered electrical items. In addition, we have also used the call for evidence to seek views on the extent to which reforms to the Waste Electrical and Electronic Equipment Regulations could be used to incentivise manufacturers to design products that last longer, are more easily repaired and easier to recycle.

We welcome your views on these measures and application to vape producers and products in the relevant sections of the consultation and call for evidence papers.

Under the current regulations, products are grouped into 14 categories. Producers of products in a particular category are obligated to finance the cost of collection, treatment, recovery and

recycling of products from that category when they become waste, based on their market share and expressed in tonnes.

Vapes currently fall under category 7 covering toys and leisure equipment, meaning producers of this type of equipment will have a share of the obligation to finance the collection and treatment of these products when they become waste.

However, the cost of treating and recycling vapes as compared to other types of toys and leisure equipment is significantly higher, with industry sources quoting costs of £13k to £20k per tonne compared to £35 to £270 per tonne for other equipment falling under category 7. This leads to three key issues which must be addressed:

- PCSs and producers do not need to ensure that vapes are collected to meet their recycling targets. This is because targets can be met through financing the collection of any category 7 item

- where vapes are collected for recycling by PCSs (for example where households return used vapes to their local authority waste and recycling centre), other category 7 producers will share the significantly higher cost of treating these vapes. This unfairly increases the compliance cost to these producers

- the challenge for PCSs to fairly apportion costs of collection and treatment of vapes acts as a disincentive for them to sign up vape producers

Proposal 3.1: to create a new discrete category of equipment for vapes.

Creating a new category for vapes will ensure that vapes producers are paying the full cost of separate collection and recycling of waste vapes. It will remove the risk of other existing Category 7 producers subsidising the cost of collection and treatment of vapes. Finally, it will remove risks to PCSs of incurring costs associated with vape collection and recycling that are disproportionate to their members' market share of the vapes placed on the UK market.

Questions

63. 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

64. 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.

65. 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.

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

Background

The WEEE Regulations provide for a market-based system in which producers must join a Producer Compliance Scheme which takes on the reporting and financial obligations on behalf of their producer members. Those financial obligations take the form of collection targets (expressed in tonnes) for each category of WEEE. There are currently 26 registered PCS approved by the relevant environment agency. The system ensures that the costs of collection and proper treatment arising at local authority household waste sites registered under the WEEE Regulations is financed by producers. It also provides for distributors of household equipment to return WEEE to PCSs to ensure proper treatment. Whilst this consultation sets out proposals to require producers to collect WEEE from households, it is proposed that this is in addition to these existing financial obligations.

The environmental regulators in each nation undertake regular compliance monitoring activities and have powers to undertake enforcement actions. The Secretary of State also carries out a number of functions to ensure the proper implementation of the requirements laid down by the WEEE Regulations. This includes setting household collection targets and considering a compliance fee methodology each year).

The Secretary of State must approve a PCS Balancing System (PBS) every three years. The PBS provides a guarantee to Local Authorities that producers will finance the cost of collection and proper treatment of all WEEE that arises at household waste and recycling centres even in circumstances where a local authority has been unable to secure a WEEE collection contract with a PCS. The PBS ensures that the costs of managing that WEEE are shared amongst all PCSs.

The extent to which PCSs have met their collection targets set annually on a UK wide basis is often used as a measure of success of the current system alongside the rate of WEEE collected, expressed as a percentage of that placed on the market. But neither of these measures are considered robust indicators of success, and we have set out earlier in this consultation document the intention to move to measures which drive behaviours and are monitored at minimum on a nation-by-nation basis.

Case for change

The current system of collection targets supported by a compliance fee is discussed further in the accompanying call for evidence. We are seeking further evidence and views on the extent to which this system should broadly remain unchanged or whether we move to a different approach including one where Local Authorities are matched to a PCS under a central system of allocation.

The responses to this consultation will help us to determine whether the point of producer responsibility is moved to the household and how a household collection service could be financed by producers. For retailers and internet sellers the provision for a Distributor Take-back Scheme could be retained in a revised format for small businesses and to deal with some of the challenges faced in providing take-back by online sellers. This is described in Chapter 2.

Three different organisations are currently approved to operate the Compliance Fee, Distributor Take-back Scheme and the PCS Balancing System. The administrative burden of approving and operating each of these systems could be reduced if they were brought under a single administrator. This simplification would mean that businesses seeking to use these provisions would in future deal with a single organisation rather than three. The outcome of the consultation and further policy development arising from the accompanying call for evidence is likely to identify other functions that could be undertaken by an administrator such as the necessary contractual arrangements for establishing and operating household collection services and providing centrally managed communication activities aimed at householders and business.

In packaging, because of the different nature of obligations and structure, the administration function is required to sit in the public sector. The position for WEEE is different, and government is therefore seeking your views on the principle of establishing an industry-led Scheme Administrator as an approach to scheme governance and administration, delivering key functions necessary in the reformed WEEE system.

The extent to which weight-based targets and collection volumes are a sufficient and accurate measure of the environmental performance of the system must also be considered alongside alternative measures of success.

Our proposals for creating a new Scheme Administrator and measuring performance of the future WEEE EPR scheme

One approach could be to approve an administrator jointly by the four governments. It would be responsible for managing and administering specific functions of the revised WEEE system on behalf of producers and other stakeholders. How a Scheme Administrator would fulfil its functions and deliver agreed outcomes and targets would be set out in its terms of approval. Approval criteria would be set out in regulations.

The key role of the Scheme Administrator would be to manage, on behalf of producers, the provision of household collection services across the UK working as necessary with delivery partners.

The Scheme Administrator could potentially act as a source of insight and expertise to government at both strategic and operational levels in certain key areas as well as being responsible for delivery of other key features of the revised regulations.

Government has a strong preference for this to be a sector-led organisation run by those obligated to fund and deliver the WEEE system. Such a model would be similar to that proposed to establish a Deposit Management Organisations which would administer the proposed deposit return schemes for drinks containers which are being established across the UK.

The four nations would have equitable authority in relation to the necessary approval and the governance framework for a UK-wide Scheme Administrator whilst at the same time respecting the devolved nature of this policy, nation level ministerial accountability and the different baselines, context, policies and legislative frameworks in each nation.

We are interested in views on whether a WEEE Scheme Administrator should undertake a number of key functions in relation to maintaining the proper functioning of the system beyond

the delivery of household collection obligations and associated communications. Depending on the outcome of this review those could include the following:

- managing the Producer Balancing system for household WEEE (and non-household if necessary)
- 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)
- development and administration of a compliance fee methodology in consultation with all PCSs, for approval by government
- 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
- 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
- assess and report on environmental performance of the future system against key performance indicators with recommendations to government on measures to improve that performance

As discussed earlier, weight-based targets (as a percentage of tonnage placed on the market) are currently used as a measure of success. However, weight-based targets are not the best measure of performance, particularly as the weight of individual products that we buy do not necessary correspond to those which are thrown away. A purchase will in many cases not lead to the disposal of a similar product. We therefore welcome evidence and views on what other performance indicators which could be used in the future system on which to measure success. For example:

1. Regular sampling of quantity/weight of WEEE in residual waste, potentially by type of product across the UK. Our proposed changes are intended to lead to the reduction of WEEE in residual waste and this is a key metric to measure success. Understanding the types of products in residual waste would potentially help to target interventions such as communications on behaviour change.

2. Convenience of recycling. Producing a metric that shows the average distance from households to their nearest consumer recycling point along with uptake by Local Authorities of WEEE household collection services.

3. Volume of WEEE in fly-tipped waste across the United Kingdom. Our changes are intended to increase the options and convenience for householders and businesses to use appropriate re-use, recycling and disposal routes. Therefore, levels of fly tipped WEEE should decline. Identification of types of WEEE that are fly-tipped would help to target interventions.

4. Measurement of consumer awareness and familiarity with both value and opportunities for reusing or recycling WEEE and potentially on hoarding WEEE across the UK. Making additional facilities for recycling available without understanding the level of consumer's motivation to re-use/recycle EEE would not give a full picture.

5. Regular assessment of the carbon impact of the UK WEEE system.

6. Reporting designed to measure the impacts of features of the UK WEEE system to encourage increased eco-design, re-use and business models to embrace the circular economy.

7. Reporting designed to measure improvements in the quality of WEEE treatment processes.

Material Focus has recently published a report entitled 'An evaluation of suitable metrics to measure the success of the UK's waste electricals and batteries system' which looks in more detail at alternative measures of success.

We want to measure the success of the new WEEE EPR Scheme in the four nations. We consider that whatever measures of success are adopted for the scheme, there should be a presumption in favour of incorporating drivers of parity of performance on a nation-by-nation basis (for example, where appropriate, setting nation-level targets) and ensuring that any additional metrics we use for measuring the performance of the system can be broken down on a nation-by-nation basis.

We would also welcome views on other measures of success which could be adopted to demonstrate the overall environmental performance of the system, together with the level of granularity which would be appropriate. We want to see data and reporting done on a more local level so we have a better picture of how the system is performing and can target appropriate interventions in areas where there may be low levels of performance.

Questions

66. 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

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

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

69. 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

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

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

72. 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.

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

74. 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

Consolidated list of questions

About you

1. What is your name?

2. What is your email address?

3. Which of the following best describes 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

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

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

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

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

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

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

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.

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

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

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?

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

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

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

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

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

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

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

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?

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

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

23. Are there are 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?

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?

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

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

Increasing distributor collections infrastructure

28. 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

29. 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

30. 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.

31. 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

32. 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

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

34. 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 ie 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

35. 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

36. 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

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

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

39. 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

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

41. 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 take-back scheme, be used to support increased levels of collections for re-use and recycling? Please select one of the following options:
    a. Agree
    b. Disagree
    c. Unsure

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

43. 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

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

45. 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

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

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

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

49. 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

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

51. How long will industry need 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

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

New producer obligations for Online Marketplaces and Fulfilment Houses

53. 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

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

55. 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

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

57. 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

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

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

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

61. What other ways, if any, should government explore to tackle the issue of non-compliance with the WEEE Regulations by online sellers?

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

Dealing with the environmental impacts of vaping products

63. Do you agree with the proposal to create a new category for vapes? Please select one of the following options:
    a. Yes
    b. No
    c. Unsure

64. 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.

65. 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. .

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

66. 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. Yes
    b. No
    c. Unsure

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

68. If you answered no to question 66, please set out details of an alternative approach to the proposed functions of a Scheme Administrator.

69. Which of the following functions do you think the Scheme Administrator should carry out?
    i. managing the Producer Balancing system for household WEEE (and non-household if necessary)
    ii. 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)

iii. development and administration of a compliance fee methodology in consultation with all PCSs, for approval by Government
iv. providing evidence and forecasts of the likely household WEEE arisings – presenting recommendations to Government s to inform setting annual financial obligations placed on PCSs for household WEEE collections
v. 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
vi. assess and report on environmental performance of the future system against key performance indicators with recommendations to Government on measures to improve that performance

70. Are there any additional functions that should be added?

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

72. 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.

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

74. 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

Glossary

ATF

Authorised Treatment Facility

- Any waste site that has a permit or a permit exemption

AATF

Approved Authorised Treatment Facility

- An ATF with an additional approval that allows them to issue evidence of the re-use, recycling and recovery of WEEE.
- Must be permitted to accept and treat WEEE.
  In Northern Ireland, this exemption is enshrined in Paragraph 49, Schedule 2, Part I of The Waste Management Licensing Regulation (Northern Ireland) 2003 (as amended

Bring bank

Containers positioned in the community where local residents can deposit certain types of recyclable materials.

DCF

Designated Collection Facility

- A site which is approved to collect WEEE under the WEEE Regulations.
- Must comply with DCF Code of Practice

DAERA

The Department of Agriculture, Environment and Rural Affairs

- DAERA has responsibility for food, farming, environmental, fisheries, forestry and sustainability policy and the development of the rural sector in Northern Ireland
- The Department assists the sustainable development of the agri-food, environmental, fishing and forestry sectors of the Northern Ireland economy

Defra

Department for Environment, Food and Rural Affairs

- The government department responsible for safeguarding our natural environment, supporting our world-leading food and farming industry, and sustaining a thriving rural economy
- Manages the Appointment of the Producer Balancing System
- Manages the appointment of the operator of the Compliance Fee

Publishes the DCF Code of Practice

Distributor

"Distributor" means any person in the supply chain who makes an item of EEE available on the market.

DTS

Distributor take-back Scheme

- An industry-led system that allows for distributors (including retailers) to fund a network of collection facilities (DCFs)
- All Local Authorities are registered as DCFs
- All distributors not registered on the DTS must offer in store take-back of household WEEE

EEE

Electrical and Electronic Equipment

- All electrical and electronic items are considered to be in scope of the Waste Electronic and Electrical Equipment Regulations (2013) unless they meet one of the exemptions as set out in regulation 7 of those Regulations

EPR

Extended Producer Responsibility

- This is a policy approach under which producers are given a significant responsibility – financial and/or physical – for the treatment or disposal of the products they place on the market when they become waste

Fulfilment house

A business which stores any goods that meet all the following conditions:

- Are owned by, or stored on behalf of, someone (third party) established inside or outside the UK.
- Offers services which are more than just storing a fully prepared product. These additional services could include but not be limited to managing orders from customers, picking and packing an order, inventory control, labelling products, arranging the transport and delivery of the product to a customer, and managing returns.
- Whether the goods are manufactured in the UK or were imported.
- Whether the goods are being offered for sale in the UK and have not been sold in the UK before.

HWRC

Household Waste and Recycling Centre

- These are provided by the Local Authority as a place where residents can safely dispose their household waste and recycling usually free of charge.

Most Local Authorities will register their HWRC as a Designated Collection Facility in order to be able to accept WEEE

Online marketplace

A business using a website or mobile phone app (such as a marketplace, platform or portal) to handle the sale of goods to customers which meets all of the following conditions:

- in any way sets the terms and conditions on how goods are supplied to the customer;
- is involved in any way in authorising or facilitating customers' payments; and
- is involved in any way in the ordering or delivering the goods, including but not limited to the arrangement or actual participation of either.

PBS

Producer Balancing System

- This has been introduced to ensure that the cost of collecting WEEE at the request of Local Authorities is shared amongst all Compliance Schemes.
- A "regulation 34 request" is a request that a Producer Compliance Scheme has to collect WEEE from a local authority site within 5 working days covering all the associated collection and treatment costs).

PCS

Producer compliance scheme

- 'A producer compliance scheme (PCS) is a membership organisation. The members are producers of electrical and electronic equipment (EEE).
- A PCS is responsible for registering all its members every year and must:
  - ensure it meets its financial obligations under the WEEE regulations

fulfil its data reporting obligations

WEEE

Waste Electrical and Electronic Equipment

- Waste electrical and electronic equipment (WEEE) is any electrical or electronic waste, whether whole or broken, that is destined for disposal.

WEEE Regulations

The Waste Electrical and Electronic Equipment Regulations 2013

List of evidence sources

Waste electricals: towards a circular economy - Research & reports - Recycle Your Electricals

DSS (2023) 'Implementing eco-modulation into the UK's WEEE system and exploring resource efficiency and eco-design for energy-related products'

A UK WEEE matching system: a feasibility study - Recycle Your Electricals

Eunomia (2019) Electrical and electronic equipment: Ingredients for Successful Extended Producer Responsibility

UN Environment Programme (2017) 'The Long View: Exploring Product Lifetime Extension'

An assessment of the levels of persistent organic pollutants (POPs) in waste electronic and electrical equipment in England and Wales (icer.org.uk)

Material Focus (2020) 'Electrical Waste: Challenges and Opportunities' -

https://wrap.org.uk/resources/reprort/quantifying-composition-municipal-waste

Research to identify and address gaps in existing WEEE data relative to the on-going policy review, Anthesis 2022

Material-Focus-Update-to-A-Review-Economic-and-Environmental-of-Kerbside-Collections-for-Waste-Electricals-March-2022.pdf (squarespace.com)

Material Focus (2022) 'New metrics that could help drive circularity in the UK's waste electricals and portable battery systems':

Valuation of externalities of selected waste management alternatives: A comparative review and analysis - ScienceDirect

DEFRA (2021) Fly-tipping statistics for England, 2020 to 2021 (December 2021).

Resilience for the Future: The United Kingdom's Critical Mineral Strategy (2022)

World Energy Outlook, International Energy Agency, 13 October 2021; The Role of Critical Minerals in Clean Energy Transitions, International Energy Agency, 5 May 2021.

A review of the environmental fate and effects of hazardous substances released from electrical and electronic equipment during recycling: Examples from China and India - ScienceDirect

Electronic waste and their leachates impact on human health and environment: Global ecological threat and management - ScienceDirect

Evidence Review of Fly-tipping Behaviour.pdf (zerowastescotland.org.uk)

Mid Sussex District Council Report: Proposal for an Enhanced Recycling Collection Service for Textiles and Small Waste Electrical and El.pdf (moderngov.co.uk)

https://www.eunomia.co.uk/reports-tools/the-climate-change-impacts-of-recycling-services-in-wales

Eunomia: Ditching Diesel central assumption for residual RCV round mileage

Valuation of greenhouse gas emissions: for policy appraisal and evaluation 2021, Annex 1,

https://www.gov.uk/government/consultations/packaging-and-packaging-waste-introducing-extended-producer-responsibility

https://www.gov.uk/government/collections/business-population-estimates

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/827960/RPC_Small_and_Micro_Business_Assessment__SaMBA___August_2019.pdf

European Commission analysis of the WEEE value chain summarised by Anthesis to Steel, Aluminium, Glass, and Dense Plastics.

The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk), page 63

Electronic waste and their leachates impact on human health and environment: Global ecological threat and management - ScienceDirect

Valuation of externalities of selected waste management alternatives: A comparative review and analysis - ScienceDirect

Mineral Extraction - an overview | ScienceDirect Topics

Increased carbon footprint of materials production driven by rise in investments | Nature Geoscience
metals_environmental_risks_report_english.pdf

Royal Society of Chemistry and Ipsos Mori (2019): Elements in Danger – Consumer survey

Dale, L. & Fujita, S. (2008), "*An Analysis of the Price Elasticity of Demand for Household Appliances";* University of California Berkeley, (February 2008).

Green Alliance: levelling up through circular economy jobs - https://green-alliance.org.uk/publication/levelling-up-through-circular-economy-jobs/

25 Year Environment Plan - GOV.UK (www.gov.uk)

Clean Growth Strategy - GOV.UK (www.gov.uk)

Title: Reforming the UK producer responsibility system for waste electricals **IA No:** **RPC Reference No:** **Lead department or agency:** **Other departments or agencies:**	**Impact Assessment (IA)** **Date:** 28/12/2023 **Stage:** Consultation **Source of intervention:** Domestic **Type of measure:** Secondary Legislation **Contact for enquiries:** WEEE@DEFRA.gov.uk

Summary: Intervention and Options

RPC Opinion: Informal scrutiny

Cost of Preferred (or more likely) Option (in 2019 prices, 2020 present value)

Total Net Present Social Value	Business Net Present Value	Net cost to business per year	Business Impact Target Status
£571.5m	-£725.9m	£130.8m	Qualifying provision

What is the problem under consideration? Why is government action or intervention necessary?

A UK-wide producer responsibility (PR) system for Waste Electrical and Electronic Equipment (WEEE) has been in place since 2006, which requires producers that place more than 5 tonnes of electronic and electrical equipment onto the market each year to finance the costs of collection, treatment, and disposal of those materials when they become waste. Despite leading to improvements in the recycling rates of WEEE items, research by Anthesis indicates that there is still only a 57% recycling rate, with around 450kt of WEEE disposed of through residual streams[1]. When WEEE is not treated correctly there are a range of environmental externalities (e.g., greenhouse gas emissions and environmental impacts on air, water, land, human and animal health from products going to Energy from Waste (EfW) and landfill) which are not fully accounted for in WEEE producers' and users' decisions. WEEE is also found in fly-tipping, an act which has social disamenity costs as well as environmental costs. In the case of WEEE found in residual waste and fly-tipping, the negative externalities are further exemplified by the hazardous materials contained within the items. WEEE also tends to contain valuable materials, which, when not recycled, are lost, undermining resource efficiency objectives. Without a change in government intervention, these problems will persist. The UK Government, together with the devolved administrations, are looking to reform the UK producer responsibility system for electrical and electronic equipment (EEE), to encourage the reuse and recycling of WEEE by making it more convenient for the public and businesses to deal with their WEEE properly. Consistent with the 'polluter pays' principle, it is proposed that the full net costs of managing WEEE will be placed on producers (as they are most knowledge on recyclability, and able to influence the design and of their products).

What are the policy objectives of the action or intervention and the intended effects? (7 lines)

The policy objective is to reduce the amount of WEEE sent to landfill, EfW and fly-tipping. The proposed policies plan to reform the current producer responsibility system for WEEE in a way that increases the collection, and improves the treatment, of WEEE. From a consumer's perspective, there should be a better understanding of how to responsibly dispose of their WEEE items with convenient collection routes, and the removal of financial barriers that some of the existing options possess. The system should fund better and more consistent recycling collections and encourage more domestic recycling and reprocessing. The new regulations should increase the current recycling and reuse rates of 57% of WEEE across the UK.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base) Maximum of 10 lines

There are six options assessed (including do nothing). Options are presented cumulatively with each option adding to the previous option.

Option 1 – Do nothing. Keep the current regulations in place with no amendments.
Option 2 – To introduce a UK wide household collection system for small items of WEEE, to be financed by producers and free of charge to households.
Option 3 – In addition to Option 2, to introduce a UK wide household collection system for bulky WEEE, to be financed by producers and free of charge to households.
Option 4 – In addition to Option 3, to strengthen distributor obligations to take back WEEE from their customers.
Option 5 – In addition to Option 4, to designate Online Marketplaces (OMPs) as a new class of producer.
Option 6 – In addition to Option 5, to create a new category for vapes. **This is the preferred option.**
Non-regulatory options have been disregarded and not appraised here. This is discussed in section 4.2

Will the policy be reviewed? It will be reviewed. **If applicable, set review date:** TBC

Is this measure likely to impact on international trade and investment?		No		
Are any of these organisations in scope?	**Micro** Yes	**Small** Yes	**Medium** Yes	**Large** Yes
What is the CO_2 equivalent change in greenhouse gas emissions? (Million tonnes CO_2 equivalent)		**Traded:** -0.39mt	**Non-traded:** -0.05mt	

[1] https://wrap.org.uk/resources/report/quantifying-composition-municipal-waste

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible SELECT SIGNATORY: _____ Date: _____

Summary: Analysis & Evidence

Policy Option 2

Description: To introduce a UK wide household collection system for small items of WEEE, to be financed by producers and free of charge to households.

FULL ECONOMIC ASSESSMENT

Price Base	PV Base	Time Period	Net Benefit (Present Value (PV)) (£m)		
2019	2020	10 Years	**Low: -59.5**	**High: 7.6**	**Best Estimate: -25.9**

COSTS (£m)	Total Transition[2] (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	14.2	1	33.9	**307.8**
High	14.2		35.1	**317.5**
Best Estimate	14.2		34.5	**312.7**

Description and scale of key monetised costs by 'main affected groups'

Producers cover the full net cost of household collection of small items of WEEE, they face transition costs to fund purchasing containers (£13.7m), staff training (£0.1m) and Scheme Administrator set-up (0.4m). They also face operational costs: Scheme Administrator costs (£44.9m), crew costs (£38.0m), vehicle retrofitting costs (£18.0m), container replacement costs (£6.8m), overheads (£6.4m), communication costs (£170.7m), costs of treating WEEE for recycling (£43.4m) and the costs of additional fuel from extra weight (£0.9m). There will be costs to society from the additional carbon released in transport (£0.5m) and the public sector will face loss of landfill tax revenue (£15.5m).

Other key non-monetised costs by 'main affected groups'

Potential cost pass-through from producers to consumers is not considered in the cost benefit analysis (these costs are ascribed to businesses in the cost benefit analysis).

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0.0	0	31.3	**258.1**
High	0.0		38.2	**315.4**
Best Estimate	0.0		34.8	**286.7**

Description and scale of key monetised benefits by 'main affected groups'

Society benefits from avoided greenhouse gas emissions from diverting waste from landfill and incineration to recycling (£188.9m), LAs benefit from avoided residual disposal costs from diverting WEEE from incineration and landfill treatment to recycling, including landfill tax savings (£15.5m) and landfill and EfW gate fee savings (£41.1m), there are also secondary market profits from additional material sales by the reprocessing and recycling industry (£102.1m).

Other key non-monetised benefits by 'main affected groups'

There may be natural capital benefits from a reduced reliance on virgin materials and the negative externalities associated with their extraction, including greenhouse gases, and a reduction in the amount of waste going to landfill and incineration. There is also a benefit to consumers from clearer communications on how to recycle and dispose of Small Mixed WEEE (SMW) alongside improved recycling collection services making it easier for them to recycle and saving them time travelling to collection points. There are also several system-wide benefits including increased transparency in the system.

Key assumptions/sensitivities/risks	Discount	3.5%

The increase in tonnage of WEEE collected might be higher or lower than currently estimated, affecting recycling rates and sectoral costs. We conducted sensitivity analysis on the assumed increase in tonnage of WEEE as a result of the policy.

BUSINESS ASSESSMENT (Option 2)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: 34.8	**Benefits: 5.4**	**Net: 29.4**	**146.8m**

[2] At this stage, only key costs and benefits have been included in sensitivity analysis (see Annex B), hence no high and low transition cost scenarios. This will be refined at final stage.

Summary: Analysis & Evidence

Policy Option 3

Description: In addition to Option 2, introduce a UK wide household collection system for bulky WEEE, to be financed by producers and free of charge to households

FULL ECONOMIC ASSESSMENT

Price Base Year 2019	PV Base Year 2020	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: -231.0	**High: 372.3**	**Best Estimate: 57.8**

COSTS (£m)	Total Transition[3] (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	14.2	1	64.5	**568.7**
High	14.2		93.0	**811.5**
Best Estimate	14.2		75.3	**660.8**

Description and scale of key monetised costs by 'main affected groups'

Same as option 2, with the inclusion of the additional costs for producers that pay for the collection of bulky WEEE, including operational costs (£327.4m), the additional fuel costs (£23.1m) and the additional treatment costs of bulky WEEE (28.3m). Society will face the costs from additional carbon (£12.2m) released from additional fuel and there will be costs to the public sector (HM Treasury) from landfill tax loss (£17.2m).

Other key non-monetised costs by 'main affected groups'

Same as in Option 2.

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0.0	0	69.5	**580.5**
High	0.0		112.1	**941.0**
Best Estimate	0.0		85.9	**718.6**

Description and scale of key monetised benefits by 'main affected groups'

Same as Option 2, with the addition of bulky WEEE collection which will divert bulky WEEE from landfill, incineration, and fly-tipping to recycling and reuse, generating further societal benefits in terms of carbon emissions reduction (£162.6m) and societal benefits from a reduction in fly-tipping reducing disamenity (£74.3m). Householders will also benefit from no longer having to pay for bulky WEEE collection (131.0m). There will be increased secondary market material revenues (£78.7m) for reprocessors as more material will be reprocessed. LAs benefit from additional avoided residual disposal costs, including landfill tax savings (£17.2m) and landfill and EfW gate fee savings (£45.6m).

Other key non-monetised benefits by 'main affected groups'

Same as Option 2.

Key assumptions/sensitivities/risks	Discount rate (%)	3.5%

Same as option 2 (albeit with the scale of sensitivities expected to be larger because of higher collection rates), with the analysis of Option 3 also being sensitive to the assumption of the percentage of WEEE diverted away from fly-tipping (10%) and the assumption of the weight of a bulky item of WEEE (60kg). We conducted sensitivity analysis on these two assumptions.

BUSINESS ASSESSMENT (Option 3)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: **72.3**	**Benefits: 11.6**	**Net: 60.8**	**303.9**

[3] At this stage, only key costs and benefits have been included in sensitivity analysis (see Annex B), hence no high and low transition cost scenarios. This will be refined at final stage.

Summary: Analysis & Evidence

Policy Option 4

Description: In addition to Options 2 and 3, strengthen distributor obligations to take back WEEE from their customers.

FULL ECONOMIC ASSESSMENT

Price Base Year 2019	PV Base Year 2020	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: 13.1	High: 1338.7	Best Estimate: 571.5

COSTS (£m)	Total Transition[4] (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	14.2	1	140.3	**1214.7**
High	14.2		183.0	**1675.8**
Best Estimate	14.2		168.2	**1452.3**

Description and scale of key monetised costs by 'main affected groups'

Same as option 2 and 3, with the inclusion of the additional costs for producers that pay for the takeback of WEEE on a 0:1 basis in store[5]. Producers face the costs of the collection of handling of additional WEEE through strengthened take-back regulations (£318.4m), the costs of treating this WEEE (£44.0m), and retailers will face a loss of revenue from no longer being able to charge for collecting an item of WEEE from households when delivering a replacement (£517.8m). Society will face the costs from additional carbon (£7k) released from increased weights fuel and there will be costs to the public sector from landfill tax loss (£48.4m).

Other key non-monetised costs by 'main affected groups'

Same as option 2 and 3.

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant	Total Benefit (Present Value)
Low	0.0	0	201.0	**1688.9**
High	0.0		303.0	**2553.5**
Best Estimate	0.0		240.6	**2023.8**

Description and scale of key monetised benefits by 'main affected groups'

Same as option 2 and 3, with the addition of extended takeback obligations which will divert WEEE from landfill, incineration, and fly-tipping to recycling and reuse, generating further societal benefits in terms of carbon emissions reduction (£556.1m). Households will face savings because they no longer have to pay for retailer household takeback (£517.8m). There will be increased secondary market material revenues (£296.4m) for reprocessors as more material will be reprocessed. LAs benefit from additional avoided residual disposal costs, including landfill tax savings (£48.4m) and landfill and EfW gate fee savings (£128.2m).

Other key non-monetised benefits by 'main affected groups'

Same as option 2 and 3, with potential additional benefits from reduced fly-tipping, reducing the cost of collections to LAs and reducing disamenity for the public. We have not quantified any additional fly-tipping benefits in our cost-benefit analysis under option 4 compared to option 3. This is due to a lack of evidence of the exact impact of each policy on fly-tipping specifically.

Key assumptions/sensitivities/risks	Discount	3.5%
Same as Option 3.		

BUSINESS ASSESSMENT (Option 4)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: 159.6	Benefits: 28.8	Net: 130.8	653.8

[4] At this stage, only key costs and benefits have been included in sensitivity analysis (see Annex B), hence no high and low transition cost scenarios. This will be refined at final stage.

[5] Consumers can return WEEE to store whether they purchase a new item or not

Summary: Analysis & Evidence

Policy Option 5

Description: In addition to Option 4, designate Online Marketplaces (OMP) as a new class of producer.

FULL ECONOMIC ASSESSMENT

Price Base Year 2019	PV Base Year 2020	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: 13.1	**High: 1338.7**	**Best Estimate: 571.5**

COSTS (£m)	Total Transition[6] (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	14.2	1	140.3	**1214.7**
High	14.2		183.0	**1675.8**
Best Estimate	14.2		168.2	**1452.3**

Description and scale of key monetised costs by 'main affected groups'

The key impact of this option is to reduce the potential for certain businesses to free ride and ensure the EEE producers selling through online marketplaces are contributing towards compliance costs. As this is not expected to change the amount of WEEE being collected, rather the distribution of costs between producers, the main costs and benefits will be the same as option 4. Some additional transition and familiarisation costs are expected to occur for Online Market Places (OMPs) however these have not been quantified. These costs will be explored further through the consultation process.

Other key non-monetised costs by 'main affected groups'

Familiarisation and transition costs to OMPs, compliance schemes and regulators.

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	0.0	0	201.0	**1688.9**
High	0.0		303.0	**2553.5**
Best Estimate	0.0		240.6	**2023.8**

Description and scale of key monetised benefits by 'main affected groups'

These are expected to be the same as in option 4. The key additional benefit of option 5 is to ensure more EEE producers are covered by the relevant regulations and ensure that costs are distributed amongst producers fairly (by limiting the opportunity for free riding). Producers already complying with their regulatory obligations will see a reduction in costs compared to those in option 4 with these costs passed to newly obligated producers, such that the overall cost to business remains the same.

Other key non-monetised benefits by 'main affected groups'

A more equitable distribution of compliance costs across EEE producers

Key assumptions/sensitivities/risks	Discount rate	3.5%

Same as option 4. The impact assessment for the packaging producer responsibility reforms (published in 2022) estimated that 46 OMPs would be obligated under similar changes to producer regulations.

BUSINESS ASSESSMENT (Option 5)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: 159.6	**Benefits: 28.8**	**Net: 130.8**	**653.8**

[6] At this stage, only key costs and benefits have been included in sensitivity analysis (see Annex B), hence no high and low transition cost scenarios. This will be refined at final stage.

Summary: Analysis & Evidence Policy Option 6 (Preferred option)

Description: In addition to Option 5, to create a new category for vapes within the regulations

FULL ECONOMIC ASSESSMENT

Price Base Year 2019	PV Base Year 2020	Time Period Years 10	Net Benefit (Present Value (PV)) (£m)		
			Low: 13.1	High: 1338.7	Best Estimate: 571.5

COSTS (£m)	Total Transition[7] (Constant Price)	Years	Average Annual (excl. Transition) (Constant	Total Cost (Present Value)
Low	14.2	1	140.3	**1214.7**
High	14.2		183.0	**1675.8**
Best Estimate	14.2		168.2	**1452.3**

Description and scale of key monetised costs by 'main affected groups'

The key aim of this option is to ensure that vapes producers alone are covering the cost of recycling vapes collected under the regulations. As vapes fall within EEE category 7 in the current regulatory system[8] (toys, leisure and sports equipment), other category 7 producers are likely to share in the cost of treating vapes collected for recycling. Creating a new category redistributes costs from other category 7 producers to only vapes producers exclusively. As vapes are more expensive to recycle than other WEEE items, were government to set ambitious targets on vapes specifically, this would lead to higher cost to producers overall. However, as Government are not currently consulting on target rates post the reforms outlined here, analysis for option 6 does not account for any additional recycled tonnage (and therefore costs) on top of that in the previous options. As such, costs are assumed to be the same as under option 5.

Other key non-monetised costs by 'main affected groups'

Familiarisation and transition costs to vapes producers, compliance schemes and regulators

BENEFITS (£m)	Total Transition (Constant Price)	Years	Average Annual (excl. Transition) (Constant	Total Benefit (Present Value)
Low	0.0	0	201.0	**1688.9**
High	0.0		303.0	**2553.5**
Best Estimate	0.0		240.6	**2023.8**

Description and scale of key monetised benefits by 'main affected groups'

These are expected to be the same as in option 5. The key benefit is to ensure that vapes producers are paying the full cost of recycling vapes collected under the regulations. This ensures that other category 7 producers are not paying overinflated fees to meet their compliances, and incentivises vapes producers to ensure their products are recyclable.

Other key non-monetised benefits by 'main affected groups'

A more equitable distribution of compliance costs across EEE producers

Key assumptions/sensitivities/risks	Discount rate	3.5%

Data on the manufacture and disposal of vapes is scarce. Some initial research suggests there may be 0.5bn vapes placed on the market in the UK each year, with 67m disposable vapes entering the residual stream annually. This will need to be explored further through the consultation process.

BUSINESS ASSESSMENT (Option 5)

Direct impact on business (Equivalent Annual) £m:			Score for Business Impact Target (qualifying provisions only) £m:
Costs: 159.6	Benefits: 28.8	Net: 130.8	653.8

[7] At this stage, only key costs and benefits have been included in sensitivity analysis (see Annex B), hence no high and low transition cost scenarios. This will be refined at final stage.

[8] https://www.gov.uk/government/publications/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations#largehouseholdd

Glossary

0:1 Takeback – A takeback service provided by retailers, allowing consumers to return WEEE, equivalent in type to those purchased from the retailer, without requiring consumers to purchase a new EEE product

1:1 Takeback – A takeback service provided by retailers, allowing consumers to return items of WEEE, equivalent in type to those purchased from the retailer, when making a new purchase of EEE from the retailer

AATF – Approved accredited treatment facility

CMA – Competition and Markets Authority

CRM – Critical raw material

DCF – Designated collection facilities

Distributors – Retailers and distance sellers that sell EEE, such as those selling online

DMR – Dry-mixed recycling

DTS – Distributor takeback scheme

EANDCB – Equivalent Annual Net Direct Cost to Business

EEE – Electric and electronic equipment

EFW – Energy from Waste

EPR – Extended Producer Responsibility

GHG – Greenhouse gas

HMT – His Majesty's Treasury

HWRC – Household waste recycling centre

LA – Local Authority

LHA – Large household appliances

OMP – Online marketplace

PCS – Producer compliance scheme

pEPR – Packaging Extended Producer Responsibility

PIR – Post implementation review

Reprocessor – A facility that turns waste materials into usable input materials for new products.

RCV – Refuse collection vehicle

SDA – Small domestic appliance

SMW – Small mixed WEEE

WEEE – Waste electricals and electronic equipment

Executive Summary

Introduction

This impact assessment accompanies the government consultation for proposed reforms to The Waste Electrical and Electronic Equipment (WEEE) Regulations 2013[9].

The aims of these reforms are to increase the quantity of WEEE that is reused and recycled and place more responsibility on producers and distributors of electronic and electrical equipment (EEE). Under the current WEEE producer responsibility system, obligated WEEE producers are required to meet certain recycling collection targets set by Government and finance these collections. However, there are barriers to collecting further WEEE (such as inconvenience, and lack of consumer knowledge, of recycling routes), which are unlikely to be corrected under the current regulations.

The proposed reforms aim to create more convenient routes for households to recycle their WEEE and ensure that producers pay towards campaigns to raise awareness of these routes. These changes will address the twin problems with current routes, of inconvenience, and lack of awareness (as identified by the Post Implementation Review[10] of the current WEEE regulations as well as further research[11]). The proposed reforms also aim to address the imbalance in obligations and enforcement between online sellers and traditional sellers, which has resulted within the existing regulatory system.

These reforms will ensure that producers pay the costs of collecting, managing, and recycling of WEEE (in line with the polluter pays principle). Using a producer responsibility system to internalise the costs of dealing with WEEE can provide incentives for EEE producers to improve product lifetimes and use modular design to enable ease of repair and recycling as this will reduce their financial obligations for WEEE collection and treatment. Implementing the 'polluter pays principle' will lead to environmental benefits by reducing the negative environmental externalities associated with waste, EEE production and the extraction of raw materials, such as greenhouse gas emissions.

Through increasing the quantity of WEEE that is recycled and reused, these reforms can have numerous benefits, including increased resource efficiency, natural capital benefits from a reduction in WEEE sent to landfill and energy from waste, reducing carbon emissions through reduced extraction, processing, and manufacturing, reducing fly-tipping and increased revenue for material reprocessors.

This impact assessment explores six regulatory options for these reforms:

- **Option 1:** Do nothing. This would maintain the current system, whereby the point of producer responsibility remains at the household waste and recycling centre and to provide a system of return for WEEE collected by distributors.
- **Option 2:** To introduce a UK-wide household collection system for small mixed WEEE, to be financed by producers and free to households.
- **Option 3:** This option is the same as Option 2, with the addition introduction of a UK-wide household collection system for bulky WEEE, to be financed by producers, and free to households, in addition to the small mixed WEEE system.
- **Option 4:** This option is the same as Option 3, but with additional aspects to strengthen distributor obligations to take back WEEE from their customers.

[9] https://www.legislation.gov.uk/uksi/2013/3113/contents/made

[10] https://www.legislation.gov.uk/uksi/2013/3113/pdfs/uksiod_20133113_en.pdf

[11] Material Focus Report, Electrical Waste - Challenges and Opportunities: An independent study on WEEE flows in the UK

- **Option 5:** This option is the same as Option 4, but with the additional aspect of designated online marketplaces as a new class of producers.
- **Option 6:** This option is the same as Option 5, but with the additional aspect of creating a new category of EEE in the regulations for vapes[12]. **This is the preferred option.**

We have disregarded non-regulatory options. The key objective of the proposed policy is that businesses that distribute and place EEE on the market take on their share of responsibilities for that equipment when it becomes waste, whilst barriers to increasing the recycling of WEEE are removed. A voluntary approach would not ensure that this is achieved. This is because it would not be rational for one producer to voluntarily cover the full costs of recycling their share of WEEE, unless their competitors were also voluntarily paying. This is evidenced by the high levels of non-compliance amongst internet sellers that are based overseas. This is a market failure, and it can only be corrected through a regulatory approach. This policy requires that producers operate on a level playing field, therefore regulations are required to ensure that all obligated producers comply.

A regulatory system of producer responsibility for WEEE has been in place since 2005 and is well understood by the sector. Our proposed policy options are seeking to build on the existing obligations set out in those regulations rather than developing a new regulatory system from scratch. We will welcome views on non-regulatory options during the consultation process. The rationale for disregarding non-regulatory options and regulatory options that are unlikely to achieve the policy aims is explained further in section 4.2.

Summary of impacts on key actors

This section summarises the responsibilities and impacts on businesses and other key actors from across the EEE supply and waste chain from the proposed reforms in the preferred option (option 6).

<u>EEE Producers</u>

EEE producers will be obligated to cover the costs of UK-wide household collection system for small, mixed WEEE (SMW)[13] and bulky WEEE[14]. This will be both financed and led by producers. The costs associated with this include:

- Set-up costs including purchasing containers for SMW collections, staff training and familiarisation and the set-up of a Scheme Administrator
- Operational costs associated with SMW collections including costs of labour from additional crew time spent collecting SMW, costs for retrofitting vehicles with containers, the costs of replacing the containers, and local and commercial overheads.
- Costs for the collection, handling, and treatment of WEEE collected through the proposed routes
- Other operational costs such as Scheme Administrator costs, communication costs and the costs of additional fuel from carrying extra weight in collections

<u>EEE Distributors and retailers</u>

EEE distributors and retailers with annual sales of over £100k will be required to offer a 0:1 takeback service whereby they provide an (in store) takeback service for WEEE without requiring the purchase of a new item. They will also be required to offer a free collection on delivery service

[12] Also known as e-cigarettes
[13] WEEE categories 2-10; https://www.gov.uk/government/publications/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations#largehousehold
[14] WEEE categories 1,11-12; https://www.gov.uk/government/publications/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations#largehousehold

for replacement bulky electricals delivered to households. Distributors would be required to inform customers of their take-back schemes at the point of sale.

Distributors and retailers will have to pay for the cost of collecting and treating the additional tonnages of WEEE collected under the amended takeback regulations. This will be a loss of revenue[15] to those distributors and retailers who currently charge for takeback.

Public Sector

There will be gains to local authorities that currently provide a SMW kerbside collection service as producers pay to cover this service for all LAs. This is a transfer of costs from the public sector to EEE producers.

The Treasury will face reductions in landfill tax as more WEEE is diverted from residual waste collections to recycling. This is a transfer from HMT to LAs and waste collectors that benefit from paying less landfill tax from increased WEEE recycling.

Local authorities will benefit from landfill and EfW gate fees savings as WEEE is diverted from landfill and EfW sites to recycling. Gate fees are levied by owners of the waste facility to cover running costs.

Reprocessors and exporters

Reprocessors and exporters will gain through increased profits from selling reprocessed WEEE materials as an input for new products on the secondary materials market. This is due to the increased supply of WEEE for recycling due to the proposed policies.

Households

Consumers who are currently paying to have their bulky WEEE collected for recycling with the purchase of a new item will benefit from no longer having to pay to recycle and get rid of their bulky WEEE.

Households will benefit more generally from increased awareness and convenience of collections, reducing their need to, for example, hoard small mixed WEEE or to take WEEE to existing recycling points (e.g., recycling banks or Household Waste and Recycling Centres). Overall, this provides more options to consumers; if it is still more convenient for households to take their WEEE to a HWRC, this option remains. However, for households for whom this is inconvenient, new options will be created.

Society

There will be natural capital benefits to society from increased recycling and reuse of WEEE. Increased recycling of WEEE produces secondary materials for use in manufacturing. Recycling and reuse of WEEE will reduce the reliance on finite, virgin materials that compose EEE, conserving them preserves the stock of these resources, protecting natural capital. This reduces the greenhouse gas emissions associated with raw material extraction, EEE production and manufacturing, and waste management. Society will gain through reduced carbon emissions. Increased reuse and recycling of WEEE will also reduce other negative externalities associated with raw material extraction and production of EEE such as pollution to air and water, deforestation, and waste creation.

[15] Further analysis will be conducted prior to the final impact assessment to estimate the profit element of this revenue in accordance with appraisal guidance

There will also be reduced negative environmental and social externalities from a reduction in fly-tipping. Fly-tipped WEEE often contains hazardous materials which contaminate soil and waterways, negatively impacting the surrounding ecosystem and wildlife. Therefore, there will be reduced negative environmental impacts from a reduction in fly tipped WEEE. Moreover, there will be societal benefits from a reduction in fly-tipping, fly-tipping generates local social disamenity costs, which will be reduced because of the proposed reforms.

Emissions Savings

In our cost-benefit analysis, we quantified the changes in UK-based carbon emissions that would occur from the policy options and identified that there would be a reduction in UK-based carbon emissions in all policy options being considered when compared with doing nothing. However, it is important to acknowledge that this does not cover the total emissions reductions that could occur[16] because in each of the policy options because regulatory economic assessments are required to exclude the net reduction in international emissions, also known as scope 3, or imported emissions. However, greenhouse gas emissions are a global pollutant and reducing them, regardless of where they are generated provides the same benefit and reduces the impact of emissions on the climate, which is a global public good. In this IA we therefore present the expected additional emissions benefits in each policy option resulting from net reduction in international emissions, even though we do not incorporate them into our formal cost-benefit analysis.

The table below presents greenhouse-gas emissions using a territorial approach vs using consumption-based approach (which accounts for emissions savings occurring outside the UK). A more detailed description of this analysis is included in section 9.1.

	Net Carbon Benefit: Carbon Avoided Over the 10-Year Policy Period (kt) – marginal impact of each policy	
Policy Option	Territorial	Consumption
2	702	1091
3	608	1210
4	2082	3406

[16] Such as production emissions taking place overseas

Summary of policy objectives and outcomes

Below is a table of the issues that the reforms intend to tackle, outlining how the reforms will overcome them, and the expected outcomes and environmental, social, and economic benefits.

Issue	Activity	Expected behaviour change	Outcome	Environmental, economic and social benefit
Although the existing WEEE Regulations have been successful in ensuring that all WEEE collected by LAs (and distributors) is properly treated and funded by producers, there are still significant volumes of WEEE entering residual waste streams, being hoarded, and fly tipped.	To mandate that producers should finance the cost of a UK-wide household collection system for small and bulky WEEE, supported by appropriate communication campaigns. Strengthen distributor take-back obligations to ensure parity of compliance costs between retailers and internet sellers. Producers to finance the cost of transport of WEEE from distributor premises. Require free collection of WEEE on delivery service, i.e., on delivery of large appliances and TVs.	Producers via a central delivery body to develop the most efficient mechanism for household WEEE collections[17]. Distributors to increase the number and convenience of collection points for WEEE reuse and recycling, expanding disposal options for households[18]. Distributors incentivised to collect more, given that the cost of transport and premises is covered by producers[19]. Increased awareness and participation in WEEE reuse and recycling.	Households to send more unwanted items for reuse and recycling. Increased quantity recyclate for secondary raw material markets. The most convenient option for householders is also the best environmental option. New collection systems that are more readily able to support reuse compared to LA HWRCs.	Reduced WEEE in residual and fly-tipped waste. Increased resource efficiency as a consequence of greater reuse and material recovery. Increased revenue for WEEE recycling and reuse sector.

[17] As it will not be mandatory for producers to use LAs for collections, the responsibility for developing the most efficient mechanism will fall on producers.
[18] There will be obligations on distributors to collect WEEE on a 0:1, rather than the current 1:1, basis as well as advertise this service more clearly to consumers. This will coincide with a removal (to distributors) of the cost of transporting collected WEEE to recycling facilities (which will be funded by producers).
[19] Under the current system, distributors can request compliance schemes (pay for by producers) pay for the cost of recycling any WEEE they collect through consumer takeback, however, must deliver this to the recycling facility (AATF). Under the reforms, producers will be required to collect this WEEE from distributors.

There is an imbalance between obligations and enforcement of internet-based vs traditional sales channels of producers and distributors with internet-based distributors currently having differing obligations related to WEEE.	To strengthen obligations on internet-based distributors to ensure parity with retailers. To obligate Online Marketplaces (OMPs) as a category of producer.	Increased participation and compliance of internet-based distributors and OMPs.	A level playing field across the EEE producer and distributor sector. Transfer of compliance costs from overseas sellers trading on OMPs to the OMP itself.	Reduced share of WEEE compliance costs amongst UK based producers, since the cost of collecting and treating WEEE is shared with OMPs who facilitate direct sales from overseas producers.

Evidence Summary

A summary of the costs and benefits of the reforms are set out below. Note that these costs and benefits are cumulative, so option 6 costs include the costs of options 2-5.

Present value (2025-2034) £ millions	**Impact on business**	**Direct/ Indirect**	**Option 2**	**Option 3**	**Option 4/5/6**
Transition Costs					
SMW Kerbside Containers	Yes	Direct	13.7	13.7	13.7
Scheme Administrator set up costs	Yes	Direct	0.4	0.4	0.4
Staff training and familiarisation	Yes	Direct	0.1	0.1	0.1
Annual Costs					
Crew Costs	Yes	Direct	32.7	32.7	32.7
Vehicle Retrofitting Costs	Yes	Direct	15.5	15.5	15.5
Flat Container Replacement Costs	Yes	Direct	5.9	5.9	5.9
Additional Fuel Costs	Yes	Direct	0.7	20.7	20.7
Local and Commercial Overheads	Yes	Direct	5.5	5.5	5.5
Communication Costs	Yes	Direct	150.5	150.5	150.5
Scheme Administrator Operational Costs	Yes	Direct	38.6	38.6	38.6
Carbon from Additional Fuel	No		0.4	10.9	10.9
Treatment Costs	Yes	Direct	35.8	59.6	96.7
Landfill Tax Loss (HMT)	No		12.8	27.3	67.9
Cost of Collection (Baseline – Transfer)	Yes	Direct	-	111.8	111.8
Costs of Collection (Extended Service)	Yes	Direct	-	167.7	167.7
Retail handling and Collection Costs	Yes	Direct	-	-	271.8
Retailers Loss of Revenue[20]	Yes	Direct	-	-	442.0
Annual Benefits					
Carbon Savings	No		155.6	291.8	757.4
Material Revenue from the Recycled Materials	Yes	Indirect	84.4	150.5	399.6
Landfill Tax Saving (LA/ Waste Collector)	Yes	Direct	12.8	27.3	67.9
Landfill and EfW Gate Fee Savings	Yes	Direct	33.9	72.2	180.0
Savings to Households no longer paying for bulky WEEE collection: Consumer Group 1	No		-	111.8	553.8
Fly-tipping Collection Cost Savings	No		-	1.6	1.6
Fly-tipping Reduction in Disamenity	No		-	63.4	63.4
Non-Monetised Benefits					
Reduced environmental negative externalities (to soil, water, and wildlife) from fly-tipping					
Reduced environmental negative externalities from raw material extraction and EEE production					
Reduced value loss from sending critical raw materials to landfill/incineration					
Reduced social and environmental negative externalities from landfill					
Increased collection of WEEE for recycling as a result of coordinated communication campaigns					

[20] It is acknowledged that profit, rather than revenue, would generally be used in appraisal. Further data will be sought prior to the final impact assessment to estimate the proportion of this cost relating to profit

International carbon emission savings					
Reduced volume of WEEE sent to landfill can help achieve legally binding residual waste targets					
Savings to households from reduced time, effort and fuel spent recycling WEEE					
Total Costs			**312.7**	**660.8**	**1452.3**
Total Benefits			**286.7**	**718.6**	**2023.8**
NPV			**-25.9**	**57.8**	**571.5**

A summary of the direct business costs and benefits and the equivalent annual net direct cost to business (EANDCB) are outlined in the table below.

Present Value (2025 - 2034) £ millions	**Option 2**	**Option 3**	**Option 4/5/6**
Transition Costs			
SMW Kerbside Containers	13.7	13.7	13.7
Scheme Administrator set up costs	0.4	0.4	0.4
Staff training and familiarisation	0.1	0.1	0.1
Annual Costs (total over 10-year appraisal period)			
Crew Costs	32.7	32.7	32.7
Vehicle Retrofitting Costs	15.5	15.5	15.5
Flat Container Replacement Costs	5.9	5.9	5.9
Additional Fuel Costs	0.7	20.7	20.7
Local and Commercial Overheads	5.5	5.5	5.5
Communication Costs	150.5	150.5	150.5
Scheme Administrator Operational Costs	38.6	38.6	38.6
Treatment Costs	35.8	59.6	96.7
Cost of Collection (Baseline – Transfer from LAs and consumers)	-	111.8	111.8
Costs of Collection (Extended Service)	-	167.7	167.7
Retail handling and Collection Costs	-	-	271.8
Retailers Loss of Revenue	-	-	442.0
Annual Benefits (total over 10-year appraisal period)			
Landfill Tax Saving (LA/ Waste Collector)	12.8	27.3	67.9
Landfill and EfW Gate Fee Savings	33.9	72.2	180.0
Direct Business Costs (Annualised)	**34.8**	**72.3**	**159.6**
Direct Business Benefits (Annualised)	**5.4**	**11.6**	**28.8**
EANDCB (Annualised)	**29.4**	**60.8**	**130.8**

Structure of the IA

Section 1: Problem Under Consideration

1.1 Introduction to the current system

Under the current Waste Electrical and Electronic Equipment (WEEE) producer responsibility system, obligated WEEE producers are required to meet certain collection targets set by Government and finance these collections. WEEE collection targets, placed on producer compliance schemes, have been set by the Secretary of State on a yearly basis since the introduction of the 2013 WEEE Regulations[21]. Provisions in the regulations provide for producer compliance schemes to pay a WEEE compliance fee as a legitimate way of meeting their WEEE collection obligations, should they not meet their physical share of the collection target.

At present, householders can return WEEE free of charge to their local household waste recycling centres (HWRC) and other collection points (such as bring banks for SMW), or they can return WEEE via retailer takeback schemes. Alternatively, most local authorities offer a charged-for bulky WEEE collection, and 86 local authorities offer free kerbside collection of SMW[22]. A total of 310kt of WEEE was collected at HWRCs and local authority waste transfer stations in 2019[23], with a further 190kt of household WEEE collected via retailer, and other takeback and collection schemes[24]. The table below shows the 14 categories of EEE under the regulations, producers must report the tonnage of EEE that they place on the market of each of these categories. The table also shows how these categories align with the classification as SMW or bulky WEEE.

Table 1: Categories of WEEE and SMW/ bulky WEEE classification

	Category of EEE
Bulky WEEE	1 - Large Household Appliances (LHA) (E.g., washing machines, dishwashers, cookers)
Small Mixed WEEE (SMW)	2 - Small Household Appliances
	3 - IT and Telecoms Equipment
	4 - Consumer Equipment
	5 - Lighting Equipment
	6 - Electrical and Electronic Tools
	7 - Toys, Leisure, and Sports equipment
	8 - Medical Devices
	9 - Monitoring and Control Instruments
	10 - Automatic Dispensers
Bulky WEEE	11 - Display Equipment (E.g., TVs, Monitors)
	12 - Cooling Appliances Containing Refrigerants (E.g., Fridges, Freezers)
N/A[25]	13 - Gas Discharge Lamps and LED light sources
	14 - Photovoltaic Panels

Since these regulations were introduced, through ensuring that EEE producers pay towards the cost of recycling or reusing WEEE from these routes, and requiring them to meet collection targets, the amount of WEEE that is collected, recycled, and reused, has improved[26], with 57% of WEEE now estimated to be collected for reuse and recycling[27]. The Post Implementation Review[28] (PIR) of the 2013 WEEE Regulations also found that this system has been largely successful at reducing the inflated costs of compliance that frequently occurred under the 2006

[21] https://www.legislation.gov.uk/uksi/2013/3113/contents/made
[22] Material-Focus-Update-to-A-Review-Economic-and-Environmental-of-Kerbside-Collections-for-Waste-Electricals-March-2022.pdf (squarespace.com)
[23] Waste electrical and electronic equipment (WEEE) in the UK - GOV.UK (www.gov.uk)
[24] Waste electrical and electronic equipment (WEEE) in the UK - GOV.UK (www.gov.uk)
[25] We did not use these categories in our analysis due to the low tonnages collected, so they are not included in SMW/ bulky WEEE categorisation.
[26] For example, 430kt of WEEE was reported as collected in 2008 compared to 500kt in 2021; https://www.gov.uk/government/statistical-data-sets/waste-electrical-and-electronic-equipment-weee-in-the-uk
[27] Research to identify and address gaps in existing WEEE data relative to the on-going policy review, Anthesis 2022, p.35
[28] Post Implementation Review of The Waste Electrical and Electronic Equipment Regulations 2013 (legislation.gov.uk)

Regulations[29], because of the inflated costs of "evidence" necessary to demonstrate compliance. Consequently, the PIR found that the costs that producers pay are largely reflective of the actual costs of collecting and treating the WEEE that is collected.

Despite being successful at increasing the amount of WEEE that is collected for recycling and reuse, whilst minimising compliance costs on producers, reliance on the current collection channels alone is likely to limit the amount of WEEE that is collected for recycling going forward. As discussed later in this chapter, several barriers to increasing collections exist. It is unlikely that the current regulations would be able to incentivise producers to set up the necessary systems to make significant improvements to the collection rate going forward.

With this in mind, we do not propose a fundamental overhaul of the existing system, but rather focus on expanding the existing collections infrastructure to ensure that more WEEE is collected and properly recycled or reused. The proceeding sections outline the barriers to increased collections and the consequences of failing to maximise the amount of WEEE that is reused and recycled. There are also issues specific to the 2013 WEEE Regulations which need to be addressed to ensure maximum effectiveness.

1.2 Barriers to increased collection of WEEE

1.2.1 Inconvenience and lack of knowledge of current collection systems

Annually, an estimated 155kt of WEEE is disposed of in household black-bin waste collections in the UK[30], which is then sent to landfill and energy from waste (EfW). This is equivalent to 5.3kg per household per year[31].

Research on public behaviour and attitudes has highlighted the public's lack of awareness and understanding of how, and where, to recycle WEEE, and the effort required to recycle WEEE compared to disposal in regular residual bin collections. Public attitudes behavioural research by Material Focus[32] found that 43% of respondents had put WEEE in general rubbish in the past 12 months. Of those respondents who had disposed of WEEE in general rubbish in the past year, 48% stated they were not aware that it could be recycled, 45% did not know how and where to recycle it, and the majority of other respondents referenced the lack of ease, and/or effort required, to recycle WEEE[33].

Since the introduction of the current regulations there has been some improvement in accessibility for consumers to dispose of their small mixed WEEE (SMW) responsibly, which has resulted in increased levels of collection of WEEE. For example, large retailers (which under the regulations are those with over £100k of turnover on electricals annually) must provide in-store takeback facilities for their customers, to meet Regulation 43 distributor takeback responsibilities[34]. Smaller stores (and internet sellers) can alternatively join the Distributor Take-back Scheme[35], approved by the secretary of state, which raises funds to support local authority WEEE collections.

Some Local Authorities (LAs) offer free household kerbside SMW collections, however, this only covers a minority of households. Of the 394 Local Authorities[36] with waste collection

[29] The 2006 WEEE Regulations created a market in which PCSs were forced to buy from collectors in order to avoid criminal offences. This "must buy" market lead to ransom pricing of WEEE evidence that that 2013 Regulations sought to address.
[30] Material Focus Report, Electrical Waste - Challenges and Opportunities: An independent study on WEEE flows in the UK, page 8 & 9, https://eq3pi6tq2z7.exactdn.com/wp-content/uploads/2021/04/Material-Focus-Electrical-waste-challenges-and-opportunities.pdf
[31] Page 76, https://static1.squarespace.com/static/5a60c3cc9f07f58443081f58/t/624309e80a326b69a211ca3c/1648560627060/Material-Focus-Update-to-A-Review-Economic-and-Environmental-of-Kerbside-Collections-for-Waste-Electricals-March-2022.pdf
[32] WEEE-public-attitudes-and-behaviours-original.pdf
[33] Among those who have put any WEEE items in the general rubbish in the last 12 months some of the further reasons given were: don't have easy access to a tip or HWRC (12%), didn't have time to take it to a top/HWRC/Recycling bank (12%), not worth the effort to recycle it (11%) and I couldn't be bothered (10%).
[34] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/292632/bis-14-604-weee-regulations-2013-government-guidance-notes.pdf
[35] https://www.gov.uk/electricalwaste-producer-supplier-responsibilities/join-the-distributor-takeback-scheme
[36] Excluding those that are Waste Disposal Authorities only.

responsibilities that have submitted collection scheme data to WRAP, only 86 offer a household kerbside SMW recycling service alongside their typical collection service. A SMW kerbside collection service is not a requirement of LAs under the current regulatory scheme, and so the services which exist cover just 22% of households[37]. The application of these kerbside SMW collections varies across the 86 LAs, for example, some LAs allow SMW in amongst other recycling items, and some require it to be placed next to the households' bin in a plastic bag. The mean weight of SMW presented by households with access to kerbside collection services is 0.7kg per household per year[38], just 13% of what is assumed to be going into the average household black bin. A shortcoming of many of these local schemes is low-level household awareness, due to limited communications.

Providing households with accessible and convenient routes to responsibly dispose of SMW, whilst supplying households with more information on how to recycle their WEEE, would undoubtedly improve recycling rates, and reduce the amount of WEEE seen in residual waste flows.

1.2.2 Costs to households

Despite the current WEEE regulations resulting in some headway in shifting some of the cost of collecting and managing WEEE onto producers, consumers are still required to take on some of the costs of collecting their WEEE. In fact, for many households, all routes to recycle WEEE lead to some form of cost.

Most LAs currently charge households to have their bulky WEEE collected, with the amount being charged varying across local authorities. Retailers/distributors also generally charge a fee for collecting bulky WEEE upon delivery of a new item of EEE. Alternatively, households can dispose of their WEEE at HWRCs and in-store with obligated retailers (those with a £100k turnover from EEE annually), however, this incurs travel and time costs for households.

These costs disincentivise some households to use the available services. Under these circumstances, they may find alternative routes of disposal, such as through residual waste, fly-tipping, or the informal scrap sector. Therefore, minimising or removing the cost to households of recycling WEEE is likely to remove another barrier to increased WEEE recycling.

1.3 Impacts of inappropriate disposal of WEEE

1.3.1 WEEE in residual waste streams

WEEE that is not collected for recycling or reuse is likely to end up in residual streams such as landfill and incineration which can lead to environmental and social disbenefits, that reduce natural capital. Hazardous materials in WEEE can contaminate soil and leach into groundwater, and landfill and incineration for EfW can generate greenhouse gases[3940]. Waste disposal can have social costs for nearby households, such as noise, dust, odours, visual intrusion, flies, and vermin[41]. Traffic to and from landfill and incineration sites can generate noise, traffic congestion, and localised air pollution[42]. These effects can undermine public enjoyment of an area, generate adverse health impacts for humans and animals, and reduce the value of the surrounding area.

1.3.2 Fly tipping

[37] Page 7, https://static1.squarespace.com/static/5a60c3cc9f07f58443081f58/t/624309e80a326b69a211ca3c/1648560627060/Material-Focus-Update-to-A-Review-Economic-and-Environmental-of-Kerbside-Collections-for-Waste-Electricals-March-2022.pdf
[38] Page 11, https://static1.squarespace.com/static/5a60c3cc9f07f58443081f58/t/624309e80a326b69a211ca3c/1648560627060/Material-Focus-Update-to-A-Review-Economic-and-Environmental-of-Kerbside-Collections-for-Waste-Electricals-March-2022.pdf
[39] Leaching characteristics of heavy metals and brominated flame retardants from waste printed circuit boards - ScienceDirect
[40] A review of the environmental fate and effects of hazardous substances released from electrical and electronic equipment during recycling: Examples from China and India - ScienceDirect
[41] Valuation of externalities of selected waste management alternatives: A comparative review and analysis - ScienceDirect
[42] Ibid.

Local Authorities in England reported 1.1 million incidents of fly-tipping in 2020/21[43], with LAs in Wales reporting 41,000 incidents[44][45]. About two-thirds of incidents in England involved household waste (65%)[46]. Fly-tipping incidents in England related to white goods (refrigerators, freezers, washing machines), and other electrical items, totalled at 75,000; a 19% increase from 2019/20 (c.62,900)[47].

Despite increased collections of WEEE, the amount of electricals identified at fly-tipping sites in England are increasing[48]. This indicates that the options available for households to dispose of their WEEE responsibly are not currently effective at addressing the problem of electricals being dumped in incidents of fly-tipping. As mentioned, the costs of using the current options are likely to be a significant factor for some households.

Fly-tipping is a source of negative externalities, the presence of fly-tipping creates disamenity for those who live locally, or travel by it. It is also damaging to the local environment. This is especially true for fly-tipping of electronic equipment as the materials can be hazardous to the environment[49], exacerbating the social disamenity to those who live locally.

It should be noted that unlike other waste streams, the cost of treatment of fly-tipped household WEEE that is cleared by local authorities and taken to a local "designated collection facility" under the WEEE Regulations (e.g., a Household Waste Recycling Centre) is already financed by producers, thereby taking a significant cost away from the local taxpayer.

1.3.3 Raw material depletion (including Critical Raw Materials)

EEE products contain a variety of critical raw materials which are lost if WEEE is not recycled or reused. Critical materials such as lithium, cobalt, copper, and rare earth elements are essential to the production of electronic devices and renewable energy systems[50]. However, these materials are finite resources, and the increased demand for EEE directly leads to an increased demand for these materials. Therefore, these critical raw materials are highly valuable to the economy.

By increasing collections of WEEE for recycling through producer funded programmes, the potential for critical raw materials to be recovered over time will increase. The Government published a Critical Minerals Strategy in August 2022[51], which commits Defra to explore regulatory interventions to promote reuse, recycling, and recovery of critical minerals.

As well as a loss of resources in the economy, there are also environmental impacts associated with raw material extraction, EEE production and manufacturing. This includes greenhouse gas emissions as well as pollution to air and water, deforestation, and waste creation. Ensuring that more WEEE is recycled and reused will minimise these impacts and increase natural capital.

[43] DEFRA (2021) Fly-tipping statistics for England, 2020 to 2021 (December 2021). Available at: https://www.gov.uk/government/statistics/fly-tipping-in-england/fly-tipping-statistics-for-england-2020-to-2021
[44] https://statswales.gov.wales/Catalogue/Environment-and-Countryside/Fly-tipping
[45] Fly-tipping statistics are not collected for Scotland and Northern Ireland.
[46] DEFRA (2021) Fly-tipping statistics for England, 2020 to 2021 (December 2021). Available at: https://www.gov.uk/government/statistics/fly-tipping-in-england/fly-tipping-statistics-for-england-2020-to-2021
[47] DEFRA (2021) Fly-tipping statistics for England, 2020 to 2021 (December 2021). Available at: https://www.gov.uk/government/statistics/fly-tipping-in-england/fly-tipping-statistics-for-england-2020-to-2021
[48] https://www.gov.uk/government/statistics/fly-tipping-in-england/fly-tipping-statistics-for-england-2020-to-2021
[49] For example, electrical waste can contain Persistent Organic Pollutants (POPs). Where WEEE is separately collected, regulations exist to ensure the appropriate disposal of WEEE containing POPs, however fly tipped WEEE will not conform to these regulations (https://www.gov.uk/guidance/classify-some-waste-electrical-devices-components-and-wastes-from-their-treatment#:~:text=If%20you%20treat%20an%20item,to%20below%20the%20concentration%20limit)
[50] World Energy Outlook, International Energy Agency, 13 October 2021; The Role of Critical Minerals in Clean Energy Transitions, International Energy Agency, 5 May 2021.
[51] Resilience for the Future: The United Kingdom's Critical Mineral Strategy https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1097298/resilience_for_the_future_the_uks_critical_minerals_strategy.pdf

1.4 The current regulations

1.4.1 Online Marketplaces (OMP)

The PIR of the 2013 WEEE regulations[52] recognised that online sales of WEEE have rapidly increased in recent years, allowing consumers to buy products from sellers in other countries more easily. This has resulted in new opportunities for "free riding" by companies defined as producers and distributors under the current regulations. Producers who are not registered with a Producer Compliance Scheme in the UK but are placing large volumes of EEE on to the UK market, are not meeting their regulatory obligations to finance the collection and treatment of that EEE when it becomes waste.

Instead, the cost of collection and treatment of these products when they become WEEE falls on obligated producers complying with the regulations by registering with the regulators. Non-compliant producers will often sell direct to UK customers online, in many instances via online marketplaces, creating a challenging environment for effective enforcement, particularly in the case of overseas sellers. Based on research undertaken by Anthesis it is estimated that 33% of EEE being placed on market is being sold by OMPs, which is 520kt of EEE[53]. Anthesis also estimate that 125-220kt of unreported EEE could be being sold by OMPs[54]. This dynamic creates an unlevel playing field between registered and unregistered producers of EEE, and we have had strong representations from industry to address this issue.

1.4.2 Vapes (e-cigarettes)

Under the WEEE regulations, EEE products are grouped into 14 categories[55]. Producers of products in a particular category are obligated to finance the cost of collection, treatment, recovery, and recycling, of all products from that category when they become waste, based on their market share, expressed in tonnes, of products placed on the market in that category. Producers fulfil that obligation through membership of a Producer Compliance Scheme. Vapes (also known as e-cigarettes) fall within category 7, which covers toys, leisure, and sports equipment. This creates a high probability that all producers of category 7 products (whether vapes or otherwise) share in the cost of recycling vapes. However, the costs of recycling vapes are significantly higher than other category 7 products. For example, stakeholders have advised that vapes can cost £13,000 to £20,000 per tonne to recycle, in comparison to £35 to £270 per tonne for other SMW items[56].

The current inclusion of vapes within category 7 leads to three key issues:

1. Producer compliance schemes and producers do not need to ensure that vapes are collected to meet their recycling targets. This is because targets can be met through financing the collection of any category 7 item.
2. Where vapes are collected for recycling by producer compliance schemes (for example where households return used vapes to their local HWRC), there is a significant risk that the other category 7 producers will share the significantly higher cost of treating these vapes. This unfairly increases the compliance cost to these producers.
3. The challenge for producer compliance schemes to fairly apportion costs of collection and treatment of vapes acts as a disincentive for them to sign up vape producers.

The current categorisation means that it is likely that vapes producers will not cover the full cost of vapes collected for recycling, which reduces the incentive for them to ensure that their products are easily recyclable.

[52] https://www.legislation.gov.uk/uksi/2013/3113/pdfs/uksiod_20133113_en.pdf
[53] Anthesis, Evidence Gaps, 2022, page 95 - 96
[54] Anthesis, Evidence Gaps, 2022, page 96
[55] https://www.gov.uk/government/publications/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations/electrical-and-electronic-equipment-eee-covered-by-the-weee-regulations#largehousehold
[56] This commercially sensitive data was provided confidentially by an industry stakeholder

At the point that the WEEE regulations were implemented, vape usage was low, and these products only made up a small proportion of category 7. However, there has been as significant increase in the use of vapes in the UK, with research suggesting that the number of vape users has increased by 400% in the last 10 years[57]. Recent estimates suggest that around 0.5 billion vapes are placed on the market each year, with 67 million disposable vapes thrown away annually[58].

Vapes contain plastic, lithium-ion batteries, and may contain other hazardous or harmful substances such as heavy metals, lead, mercury, and nicotine, which can contaminate the natural environment if vapes are not properly treated at end of life. Vapes are composed of critical, finite raw materials that are vital for the green economy and represent a value loss to the economy if vapes are not recycled.

Section 2: Rationale for Intervention

2.1 Negative externalities and the polluter pays principle

Waste generation can lead to negative externalities. WEEE disposed of via residual routes such as landfill and EfW can lead to environmental externalities such as greenhouse gas (GHG) emissions. Many electricals contain hazardous materials including lead, mercury, and a number of brominated flame retardants[59]. WEEE disposed of via fly-tipping and landfill can have a negative impact on land and water sources. For example, brominated flame retardants are classified as Persistent Organic Pollutants, meaning that they need to be irreversibly destroyed to avoid their impacts entering human and animal food chains[60]. When WEEE is sent to landfill or fly-tipped, these materials can lead to dangerous chemicals entering the environment, leaching into soil, groundwater, and waterways[616263]. This can adversely impact ecosystems, wildlife, livestock, and crops.

As well as environmental externalities, there are social externalities associated with landfill and incineration of WEEE; nearby households can be impacted by noise, dust, odours, visual intrusion, flies, and vermin[64]. Traffic to and from waste disposal sites can generate noise, traffic congestion and localised air pollution[65]. Fly-tipping also results in a social disamenity cost for those living locally[66]. These negative externalities can undermine public enjoyment of an area, generate adverse health impacts, and reduce the value of the surrounding area.

Furthermore, there are negative environmental externalities associated with critical raw material extraction and production for EEE. EEE is composed of finite, often scarce, raw materials[67]. The extraction and production of raw materials and manufacturing of EEE is an energy-intensive process, and results in greenhouse gas production, pollution to the air and water, deforestation, and waste generation[68]. When WEEE is not reused or recycled, the value of the critical raw materials is lost, and the negative externalities associated with EEE production are not avoided.

Using a producer responsibility system to internalise the costs of dealing with WEEE can provide incentives for EEE producers to reduce the environmental impacts of WEEE, and ensure a higher proportion is reused and recycled. It requires EEE producers to pay towards the cost of recycling;

[57] From 0.7m in 2012 to 3.6m in 2021: https://ash.org.uk/uploads/Use-of-e-cigarettes-vapes-among-adults-in-Great-Britain-2021.pdf
[58] https://eq3pi6tq2z7.exactdn.com/wp-content/uploads/2022/12/Material-Focus-Vapes-briefing-working-doc-6-Dec-2022.pdf
[59] Waste Electrical and Electronic Equipment recycling (WEEE) (hse.gov.uk)
[60] Using persistent organic pollutants (POPs) - GOV.UK (www.gov.uk)
[61] A review of the environmental fate and effects of hazardous substances released from electrical and electronic equipments during recycling: Examples from China and India - ScienceDirect
[62] Electronic waste and their leachates impact on human health and environment: Global ecological threat and management - ScienceDirect
[63] Valuation of externalities of selected waste management alternatives: A comparative review and analysis - ScienceDirect
[64] Ibid.
[65] Ibid.
[66] Evidence Review of Flytipping Behaviour.pdf (zerowastescotland.org.uk)
[67] https://eq3pi6tq2z7.exactdn.com/wp-content/uploads/2021/07/Contributing-towards-a-circular-economy-utilising-Critical-Raw-Materials-from-Waste-Electricals-Final.pdf
[68] metals_environmental_risks_report_english.pdf

incentivising them to improve product lifetimes and the ability to recycle products. This results in a reduction in the volume of WEEE and the environmental impacts of WEEE and EEE production[69].

Currently, producers do not pay the full cost of managing WEEE collected for recycling (for example, where households are paying for bulky WEEE collections or to return WEEE to a retailer). Expanding the regulations to cover the full cost of managing WEEE collected for recycling will enhance the incentives on producers.

2.2 Coordination failure

The previous section identified barriers to increasing the amount of WEEE collected for recycling, particularly from households. This includes the need to increase convenience of collection routes and consumer knowledge of WEEE recycling. Both aims are likely to be difficult for producers to achieve without government intervention, due to the requirement to coordinate.

Setting up more convenient collection systems (such as the options to be explored in the consultation) would likely require high set-up costs. This would make it inefficient and more expensive for individual producer compliance schemes to set up and run individual collection systems. The cost and complexity of the system is likely to be a barrier to a coordinated approach without government intervention.

WEEE producers have consistently missed collection targets in recent years. Since 2017, producers have only met SMW, and several bulky WEEE (cooling and LHA) targets on one occasion. The average proportion of target tonnage collected over this period was 87% for SMW and 93% for bulky WEEE categories (1,11-12) combined. The tonnage of SMW and bulky WEEE collected has fallen relative to the previous year, in 4 and 5 years, respectively out of the last 6 years. The tonnage of SMW collected in 2022 was 15% lower than 2017, and bulky WEEE collected was 9% lower in 2022 than 2017[70].

Unlike other waste streams, such as packaging, it is not possible to make a clear in-year link between what is placed on the market and what is available for collection within the WEEE system. This is because most EEE products do not become waste within a year of purchase. Therefore, it is difficult to draw strong conclusions on the amount of WEEE that is available for collection in a given year based on the amount of EEE that is placed on the market. However, there are enough datapoints in the WEEE data to compare the amount of WEEE collected as a proportion of POM over a longer period. This should, to some extent, account for this limitation.

Table 2 shows the amount of household WEEE collected in each year as a proportion of the average placed on the market tonnage for a given number of previous years. Bulky WEEE can last for 10 years or longer. Therefore, the average placed on the market tonnage for the previous 10 years is used for bulky WEEE. SMW is likely to become WEEE in a shorter timeframe and so 5 years is used. The table shows that for both bulky WEEE and SMW the tonnage collected as a proportion of placed on the market tonnage has slightly decreased over the period analysed.

Table 2: Proportion of WEEE collected in year as a proportion of average Placed on the Market (POM) tonnage over 5 or 10 years[71]

[69] As discussed by the OECD in their guide to Extended Producer Responsibility (EPR), EPR places “explicit responsibility” on the producer, essentially placing them in a leadership position to influence decision making and behaviour change across the supply and usage chain. The producer is seen as most able to influence the environmental impacts of their products, having greatest access to technological expertise, propriety information and product knowledge, and therefore influence over design. Producers are also at a key point in the supply chain to influence other members, including suppliers, businesses, consumers, and retailers. The full responsibility is initially placed on the producer, with the producer best placed to “distribute” this responsibility, such as to consumers in the form of higher prices (see section 9.3), leading to the externality to be fully internalised by the supply chain. Despite this the producers retains the “ultimate” or “primary” responsibility. https://www.oecd-ilibrary.org/environment/extended-producer-responsibility_9789264189867-en

[70] https://www.gov.uk/government/statistical-data-sets/waste-electrical-and-electronic-equipment-weee-in-the-uk

[71] https://www.gov.uk/government/statistical-data-sets/waste-electrical-and-electronic-equipment-weee-in-the-uk

	Categories	No of years POM averaged	2017	2018	2019	2020	2021	2022
SMW	2-10	5	34%	32%	31%	24%	25%	26%
Bulky WEEE	1,11-12	10	47%	44%	44%	42%	42%	40%

Despite the limitations identified, this analysis suggests that, even when accounting for shifting trends over time, the amount of WEEE collected through current routes has at least plateaued. Given that new collection routes are needed, but have not been initiated by producers, despite them consistently missing their targets, suggests that the current regulations alone have not provided enough incentive for producers to do so. This is backed by anecdotal evidence from industry stakeholders, who informed us that producers are collecting the maximum amount possible through current systems but are reluctant to do more without a level playing field across producers.

The current system has not adequately encouraged producers or compliance schemes to educate and inform consumers or finance such activities. This is because the cost of doing so would potentially be borne by one organisation, but the benefits could be felt by all. Some organisations have carried out consumer education campaigns, however, to reach high levels of collection and recycling, consumer education and information must be prioritised and scaled up.

The problem of insufficient information (households lacking knowledge about WEEE recycling), if left up to the free market, would not correct itself. This is because there is no incentive, as things stand, for producers to collectively make change. Introducing a regulatory framework which shifts direct communication and education responsibility onto producers of EEE will result in a shift towards a more complete, and better understood, WEEE recycling system.

2.3 Potential for producers to free ride obligations

The PIR[72] identified that online sales have rapidly increased in recent years, allowing consumers to buy products directly from sellers in other countries more easily, resulting in increased opportunity for avoidance of the obligations placed on producers and distributors.

The key challenge is the ability of regulators to take meaningful action against non-compliant internet sellers that operate from overseas territories that fall outside of the jurisdiction of UK-based regulators. Although online marketplaces (OMPs) are frequently used by overseas sellers to facilitate sales in the UK, they do not have any obligations under the current regulations in respect of the sellers that use their platforms.

This is not an issue specific to an extended producer responsibility (EPR) system for electricals. The reform of regulations that place obligations on producers of packaging[73], identified the same issue of overseas packaging producers free riding through OMPs, and the Government has set out its plans on how it will be addressed. That underlines the need for free riding to be addressed in the EEE market.

2.4 Avoiding Regulatory Failure

Although vapes producers are currently obligated under the WEEE regulations (and must contribute to the recycling of WEEE), the current regulations do little to incentivise the increased

[72] https://www.legislation.gov.uk/uksi/2013/3113/pdfs/uksiod_20133113_en.pdf
[73] https://www.gov.uk/government/consultations/packaging-and-packaging-waste-introducing-extended-producer-responsibility

recycling of vapes specifically. While vapes remain within category 7, vapes producers are unlikely to cover the full cost to treat vapes collected for recycling (in line with the producer pays principle), with other category 7 producers likely to also share this cost. As well as placing an unfair burden on other category 7 producers, this reduces the incentive on vapes producers to ensure that their products can be easily recycled (either through product design or recycling infrastructure).

Previously, vapes made up a small proportion of category 7, such that these issues were minimal. However, with the rapid increase in the use (and disposal) of vapes, amendments to the regulations are needed.

Section 3: Policy Objective

3.1 Strategic objectives

The proposed policy reforms (set out in the consultation document and in Section 4) build on the strategic objectives included in the commitments made in the Clean Growth Strategy[74], the 25 Year Environment Plan[75] and the Resources and Waste Strategy[76]. These commitments include:

- BEIS Clean Growth Strategy: Commitment to explore how we can better incentivise producers to manage resources more efficiently through producer responsibility systems.
- The 25 Year Environment Plan: Commitment to reform Producer Responsibility systems to incentivise producers to take greater responsibility for the environmental impacts of their products.
- Resources and Waste Strategy:
    - Maximising the value we get from resources throughout their lifetimes - by designing products more smartly to increase longevity and enable recyclability.
    - Managing materials at end of life – by targeting environmental impacts.

Furthermore, the Resources and Waste Strategy set out the following policy objectives specifically in relation to the 2013 WEEE Regulations to:

- Increase levels of WEEE collections for reuse and recycling,
- Review options for tackling the growing number of internet sellers who do not meet their obligations,
- Review the existing obligations placed on distributors; and
- Ensure alignment with the broader EPR framework, published in the Strategy.

3.2 Post Implementation Review of the WEEE Regulations 2013

The PIR[77] has found that the existing regulations have been effective in ensuring that producers finance the cost of collection and proper treatment of household WEEE currently separately collected. The market-based system, in which Producer Compliance Schemes are placed in “the chain of custody of the waste”, established under the existing regulations, has ensured that compliance costs are largely reflective of the costs incurred in transport and subsequent proper treatment of WEEE that enters the system established under the regulations.

However, there were some areas which the PIR identified as needing addressing through a further regulatory reform. These included:

1. To make it easier for consumers to responsibly discard of unwanted WEEE to drive up existing levels of separately collected WEEE for reuse and recycling.

[74] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700496/clean-growth-strategy-correction-april-2018.pdf
[75] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf
[76] https://www.gov.uk/government/publications/resources-and-waste-strategy-for-england/resources-and-waste-strategy-at-a-glance
[77] https://www.legislation.gov.uk/uksi/2013/3113/pdfs/uksiod_20133113_en.pdf

2. To review the role of different actors across the supply chain of EEE to bring investment in an expanded collections infrastructure for household WEEE.
3. To address high levels of non-compliance with producer obligations by online sellers.
4. To review scope of the distributor WEEE take-back obligations, to ensure parity of obligation between online sellers and retailers.
5. To review role of the "distributor take-back Scheme" whose membership provides an alternative to distributors taking back WEEE from customers and instead provides funds to support local authority WEEE collections for reuse and recycling.
6. To review the business-to-business (B2B) system so that it is easier to access for business end users of equipment to return WEEE to producers, leading to higher levels of collections of B2B WEEE.

3.3 Policy objectives

The specific policy objectives that have been developed from our commitments made in the Resources and Waste Strategy and following a review of the outcomes of the PIR are listed below. A further policy objective has been included to address issues in the regulations relating to vapes:

1. **Increase collections of household WEEE for reuse and recycling:** primarily by introducing a UK-wide household collection system for WEEE, moving the point of producer responsibility to the household[78], and extending the role of retailers and internet sellers in fulfilling their take back obligations.
2. **Tackle the issue of free riding in the WEEE system by online sellers:** by placing new producer obligations on online marketplaces through the creation of a new category of producer.
3. **To ensure that vapes producers are financing the full cost of recycling vapes collected in the regulations:** by creating a new category for vapes in the WEEE regulations.
4. **Increase collections of non-household WEEE for reuse and recycling:** by strengthened obligations on producers of B2B equipment. This includes gathering views on placing the point at which producer responsibility starts at the business end-user[79].
5. **Incentivise increased eco-design of products and supporting the circular economy:** this includes using incentives to encourage more reuse, circular economy business models, and using "eco modulation" of WEEE compliance costs, to encourage producers to make more sustainable products.
6. **Drive up treatment standards and explore policy interventions that incentivise the recovery of critical raw materials (CRMs)**

This impact assessment assesses policy options outlined in the accompanying consultation. These relate to Policy Objectives 1 to 3. A call for evidence will accompany the consultation to gather further evidence on additional policy options and proposals to support Policy Objectives 4 to 6. The contents of the call for evidence are outside the scope of this impact assessment and would be subject to future consultation and economic analysis.

Section 4: Summary of Policy Options Considered

The policy options considered in this analysis have been designed in line with the policy objectives discussed above, of aiding the convenience, understanding and ability to collect, reuse and recycle WEEE.

4.1 Appraised options

These options are presented with NPV calculations alongside the do-nothing option:

[78] I.e., producers are responsible for collecting WEEE from the household, rather than collection points such as HWRCs
[79] I.e., producers would be responsible for collecting WEEE from businesses directly

Option 1. The do-nothing option. This would maintain the current system, whereby the point of producer responsibility remains at the household waste and recycling centre, and to provide a system of return for WEEE collected by distributors.

Option 2. To introduce a UK-wide household collection system for small mixed WEEE (SMW), to be financed by producers and free to households. This option specifically aims to address the problem of inconvenience and cost to households of disposing of SMW, by ensuring that producers are responsible for collecting SMW directly from households free of charge. This should eliminate the lack of incentive to recycle SMW and reduce the amount that is disposed of in residual waste (and littering in the case of vapes)[80]. It is proposed that this would also include a coordinated consumer communications campaign to address the problem of the lack of knowledge around recycling of WEEE.

This option would move the point of producer responsibility from a local authority waste site to each respective household. We envisage that such an obligation is likely to be most effectively discharged on behalf of producers by an industry-led, not for profit, central body. Such a body would require government approval, which would be assessed against a set of criteria that are specified in legislation. The body would be responsible for establishing the system, contracting as necessary with organisations to undertake WEEE collections, and ensuring that these items are sent for proper treatment, reuse, and recycling. It would be required to propose a methodology for fairly charging the costs incurred in treatment, reuse, and recycling of WEEE to producers and/or producer compliance schemes[81]. These costs would also cover household-related communications, which the central body would be responsible for delivering on behalf of producers.

We are <u>not</u> mandating how this must be delivered. Currently, 86 local authorities offer a kerbside collection service for small mixed WEEE, and working with these, and the other LAs (and their waste management contractors), as delivery partners could be the most effective delivery model for the central body to adopt. This IA has therefore costed this option **<u>on the assumption that the service will be delivered through local authorities and their service providers</u>** as an add on to their existing waste collection services. However, in reality, producers may develop an alternative approach. It might also be the case that the model varies across different areas to reflect local demographics or that the industry adopts alternative methods to meet the obligations set out in regulation.

Option 3. To introduce a UK-wide household collection system for bulky WEEE, to be financed by producers, and free to households, in addition to the small mixed WEEE system. This is the same as Option 2, building upon it with the addition of a bulky WEEE collection from households. As with option 2, this aims to address the problems of cost and inconvenience to households of recycling WEEE by ensuring producers are responsible for collecting bulky WEEE directly from households free of charge.

As with Option 2, we envisage this being delivered on behalf of producers by a new industry-led, not for profit, central body, approved by government. Similarly, we will not be mandating how this service must be delivered, however we anticipate this would be an “on demand” service, similar to the bulky waste collection services currently offered by some local authorities. Again, the most efficient delivery route may be through partnerships with local authorities, who on the whole, currently provide households with a bulky waste service for a fee but ensuring that it is offered free-of-charge to households. This IA has therefore costed this option **<u>on the assumption that the service will be delivered through local authorities and their service providers.</u>**

[80] SMW is assumed more likely to be disposed of through residual than through other means such as fly tipping due to the ease of this disposal route

[81] It is anticipated that producers would be charged based on the costs of collecting SMW by the 14 category types in order to maximise the incentive for producers to consider recycling costs/recyclability in their product design. The exact mechanism will be determine by the Scheme Administrator once set up.

Option 4. This option is the same as Option 3, but with additional aspects to strengthen distributor obligations to take back WEEE from their customers. These aspects include:

- Part 1: We would seek to introduce a mandatory obligation on sellers to offer a free-of-charge collection of an old large domestic EEE appliance (i.e., bulky WEEE) upon delivery of a new replacement item[82]. Many retailers offer this service on a paid basis currently, but under the reform they would be required to offer this service for no additional charge. I.e., businesses would be mandated to provide this service, and the service should be free for charge to consumers.

- Part 2: Mandating distributors with an annual EEE turnover of over £100k to provide a "0:1 takeback service" for all categories of WEEE[83]. Currently, the take-back obligation is on a 1:1, like for like basis for goods sold. Under this option, these distributors would be mandated to provide a free takeback service[84] for EEE that is the same type as has been sold in their stores or online, without the requirement to purchase a new item to access the service. Distributors below the £100k threshold would continue to provide a 1:1 takeback service. The consultation asks for views on whether alternative obligations should exist for solely online sellers, fulfilment houses or online marketplaces, who are likely to find these requirements challenging.

- Part 3: Mandating producer compliance schemes to bear the cost of transport of WEEE from the distributors' premises to an approved accredited treatment facility (AATF) for treatment. Currently producer compliance schemes must simply have systems in place to receive WEEE from distributors. This means that the distributor bears the cost of transport from their premises to a specific point (e.g., treatment facility) nominated by the producer compliance scheme. This cost can act as a disincentive for the distributor to maximise their take-back from consumers.

This option will result in additional tonnes of WEEE being reused and recycled. As each of the considered options are cumulative, this option provides the highest quantity of WEEE captured for reuse and recycling (as demonstrated in this impact assessment). It is more convenient, and efficient for a retailer to pick up bulky WEEE when delivering a new item than for LAs to make additional journeys to collect bulky WEEE. Implementing both LA collection and retailer collection offers a wider range of options to enable households to recycle their WEEE, which addresses the current underlying problems of inconvenience and financial costs of recycling WEEE.

Option 5. This option is the same as Option 4, but with the additional aspect of designated online market places (OMPs) as a new class of producers. The proposal is designed to address problems with the current regulation and ensure that OMPs contribute to the costs of collection, treatment, recovery and reuse or recycling of WEEE, that reflects the UK market share of their overseas online sellers. By designating them as a new class of producer, OMPs would stand in the shoes of the overseas sellers on their platform and be obligated to register with a Producer Compliance Scheme and submit the same data as other producers. This is consistent with government proposals to place obligations on online marketplaces as part of wider proposals to introduce extended producer responsibility for packaging[85].

No specific costs and benefits have been quantified for this option as these are expected to be largely the same as in option 4 (albeit with some transition costs for which we plan to seek

[82] Generally, there is a requirement for the consumer to at home to take delivery of the replacement item which makes collection of the old appliance easier. However, current LA bulky waste services often allow households to leave their bulky items outside their home (either from the night before, or morning of to minimise damage from weather) which removes the need to be in at the time of collection.
[83] Online only sellers would be required to provide a 1:1 takeback service, however the consultation acknowledges that a 0:1 take back service for online only sellers could be challenging and asks for views on whether an alternative option for meeting takeback obligations should be offered to these sellers
[84] Such as in store takeback
[85] https://www.gov.uk/government/consultations/packaging-and-packaging-waste-introducing-extended-producer-responsibility

evidence on through the consultation process). See section 7.4 for more details on the costs and benefits in option 5.

Option 6 is our preferred option. Option 6 is the same as option 5, with the addition of the creation of a new category in the WEEE regulations for vapes. As with option 5, this would address problems existing under the current regulation and enhance their effectiveness.

Under the current regulations[86], EEE products are grouped into 14 categories. Producers of products in a particular category are obligated to finance the cost of collection, treatment, recovery and recycling of products from that category when they become waste, based on their market share and expressed in tonnes. Vapes fall within category 7 which covers toys, leisure, and sports equipment, which means that producers of other category 7 products share the cost of recycling vapes collected for recycling.

Creating a new category for vapes will ensure that vapes producers are paying the full cost of recycling vapes that are collected. It will remove the risk of other existing Category 7 producers subsidising the cost of collection and treatment of vapes. This is expected to enhance the incentive on vapes producers to minimise the cost of recycling their products.

No additional costs and benefits have been quantified for this option, on the basis that costs would largely remain the same as option 5. This is because the primary aim of this option is a redistribution of costs between producers. It is acknowledged that there may be transitional cost which have not been quantified. A more thorough discussion on the potential costs and benefits for this option are explored in section 7.5.

4.2 Disregarded options

We have disregarded non-regulatory options. The key objective of the proposed policy is that businesses that distribute and place EEE on the market take on their share of responsibilities for that equipment when it becomes waste. A voluntary approach would not ensure that this could be achieved. This is because it would not be rational for one producer to voluntarily cover the full costs of recycling their share of WEEE, unless their competitors were also voluntarily paying. This is a market failure, and it can only be corrected through a regulatory approach.

The PIR[87], along with external research[88], identified the need to increase the convenience of collections to households to see significant increases in the amount of WEEE collected for recycling (rather than being disposed of in residual or illegitimate disposal routes). As evidenced in section 2.2, producers have frequently missed targets in recent years, and producer representatives have consistency fed back (for example, through the annual target setting consultation process) that they feel that they are extracting as much WEEE for recycling as possible through the current collection systems.

As set out in sections 1.2 and 2.2, there is evidence of further WEEE existing that could be recycled if more convenient collection systems were in place. For reasons outlined in the previous paragraph, producers have thus far not set up these systems to meet their targets. To incentivise producers to set up these systems, a level playing field needs to be created to ensure individual producers cannot free ride contributing to costs. Therefore, regulations are required to ensure all obligated producers comply.

The high levels of non-compliance within the current system amongst internet sellers that are based overseas[89] provides evidence that in the absence of an enforceable, regulated regime,

[86] https://www.legislation.gov.uk/uksi/2013/3113/contents/made
[87] https://www.legislation.gov.uk/uksi/2013/3113/pdfs/uksiod_20133113_en.pdf
[88] WEEE-public-attitudes-and-behaviours-original.pdf
[89] As identified by the Post Implementation Review of the current regulations; https://www.legislation.gov.uk/uksi/2013/3113/pdfs/uksiod_20133113_en.pdf

businesses will not voluntarily seek to take on the necessary financial obligations that ensure producers and distributors finance the external cost of collection and proper treatment of their products when they become waste.

Furthermore, most categories of EEE are classified as hazardous waste at end of life, and the income generated from material recovery is outweighed by the costs incurred through collection and proper treatment. Thus, regulation is needed to guarantee the proper treatment of these materials. Taken together, both factors will disincentivise voluntary approaches to be undertaken by business.

A regulatory system of producer responsibility for WEEE has been in place since 2005 and is well understood by the sector. Our proposed policy options are seeking to build on the existing obligations set out in those regulations rather than developing a new regulatory system from scratch. The commitment to reform the existing regulations was set out in the Resources and Waste Strategy for England, published in 2018[90]. The objective is to embrace the principle of "full net cost recovery" set out in that strategy, and to do so in a way that ensures that compliance costs are shared fairly amongst producers and distributors, irrespective of their selling methods.

Options to further develop the current regulations must seek to address the problems identified, which are unlikely to be corrected without further intervention, and meet the policy aims. This includes ensuring that businesses are paying the full cost of recycling the WEEE they place on the market, while also removing barriers to the increase in WEEE collected for recycling. These aims should be achieved at minimal costs to those involved, to maximise net benefits to society.

Regulatory options that are unlikely to achieve these aims were therefore also disregarded. For example, mandating local authorities to collect SMW and bulky WEEE from households on a free of charge basis. Although more convenient for households, this does not place the financial cost of collecting and treating WEEE on producers. Mandating that producers finance the collection of WEEE from households through a specific scheme design would allow less scope for producers to explore different options and implement the most cost-effective option[91].

Lastly, an option that requires producers to just finance more communication campaigns would only partially meet the objectives and was therefore disregarded. By including communication campaigns alongside a national requirement on producers to provide households with more convenient collections, as set out in our preferred option, the effectiveness of communication campaigns is likely to be much higher than an option that only financed more communication campaigns with no other intervention, because there will be a simpler, more consistent national message[92]. We will welcome views on non-regulatory options during the consultation process.

Section 5: Detailed Description of Option 1 (Do Nothing)

5.1 Current Systems

The baseline scenario is presented as Option 1, 'Do nothing'. This assumes a maintenance of the current WEEE systems and regulations[93], whereby the point of producer responsibility remains at household waste and recycling centres. The current system for flows of WEEE is presented below in figure 1.

[90] Resources and waste strategy for England - GOV.UK (www.gov.uk)
[91] For example, to consider whether it is more cost effective to have different systems in different geographic areas due to specific characteristics of that area
[92] Although producers could in theory develop different schemes in different areas, the main message that every household is entitled to free collections of SMW and/or bulky WEEE from the home remains consistent
[93] https://www.legislation.gov.uk/uksi/2013/3113/contents/made

The baseline scenario assumes that distributors, producers, and local authorities make no changes with respect to the offered WEEE collection or takeback systems, the composition of the products material, and how WEEE is processed.

Existing distributor responsibilities for WEEE[94] are as follows:

- Provide either a free in-store take-back service to customers on a one-for-one, like-for-like basis, or
- Set up an alternative free take-back service, or
- Be a paying member of the distributor take-back scheme.

Existing producer responsibilities for WEEE are as follows:

- For producers who place less than 5 tonnes of EEE on the market per annum: Register as a small-scale producer of EEE with the regulator directly if they, or
- For producers who place more than 5 tonnes of EEE on the market per annum: Register with a producer compliance scheme, register with the relevant environment agency, report placed on the market data
- For all producers: Mark product with the crossed out wheeled bin symbol

Producer compliance schemes are responsible for collecting member EEE data and reporting to the authorities, as well as meeting their collection targets by arranging for collection and treatment of WEEE. Their costs are covered by charging producer members a fee. This system is assumed to remain unchanged in the baseline as well as the policy options considered.

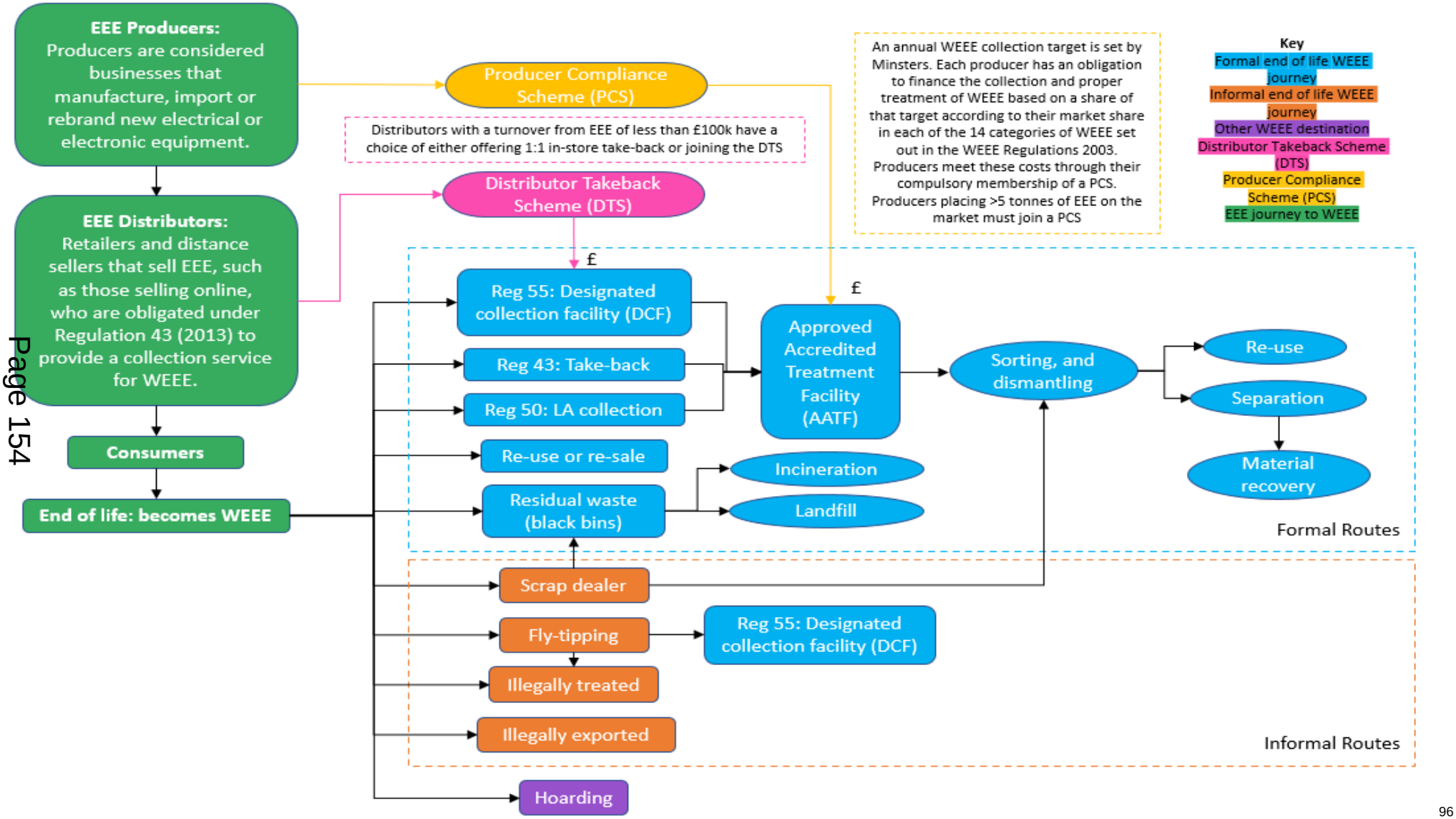
Although not regulated directly, local authorities already offer key services of collection of WEEE, including:

- 86 local authorities voluntarily offer a free kerbside collection service of small mixed WEEE, which is collected in parallel to existing recycling services. Households in these 86 local authorities are offered a service where they can place their SMW out for collection at the same time as their recycling collections. The way in which they are asked to do so varies, for example, placing within a recycling bin or placing next to these bins in a plastic bag.
- Local authorities offer a bulky waste collection to households for large domestic appliances and cooling equipment and other bulky items. This is typically a paid-for-service with only a minority of local authorities offering this for free. This paid-for-service is assumed to continue in the baseline.
- Operating HWRC networks, these can be approved by the Secretary of State's Designated Collection Facilities (DCFs) under the WEEE Regulation. The WEEE Code of Practice sets out roles and responsibilities of DCFs and the producer compliance schemes that service those sites.[95] The DCFs are then responsible for contracting with producer compliance schemes to manage WEEE via approved accredited treatment facilities (AATFs).

[94] https://www.gov.uk/electricalwaste-producer-supplier-responsibilities

[95] https://www.gov.uk/government/publications/waste-electrical-and-electronic-equipment-weee-collection-code-of-practice/collection-of-waste-electrical-and-electronic-equipment-weee-from-designated-collection-facilities-dcfs-code-of-practice

Figure 1: Baseline flows of WEEE under the current system



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[96] Regulation 43 obligates distributors (i.e., retailers and distance sellers such as those selling online) to provide a collection service for WEEE. Regulation 50 allows a local authority to establish and operate a system to take back WEEE from private households provided that the system is consistent with the WEEE Directive. Regulation 55 sets out the approval process and the Designated Collection Facility (CDF) operator responsibilities. (2013). The Waste Electrical and Electronic Equipment Regulations 2013 (legislation.gov.uk)

5.2 Tonnages Collected

The baseline WEEE tonnages presented in this impact assessment are based on modelling by Anthesis[97]. Their approach and output data are summarised here.

Baseline estimates have been created utilising 2019 data to avoid being skewed by any outlying impacts seen in years that were affected by the Covid-19 pandemic. Given that the data utilised for WEEE is typically reported in calendar years, the 2018/19 data is used as the most recent representation of a full year and is therefore assumed to be representative of 2019[98].

WEEE is collected and managed by multiple operators, including local authorities, retailers, and informal collectors. Although the collection routes differ, the main end destinations of WEEE are recycling, reuse, landfill and energy from waste. Estimates of tonnages associated with each of the collection systems influenced by this policy area are explained in detail below, along with assumptions surrounding the associated end treatment.

5.3 Local authorities

Local authorities directly collect segregated WEEE at kerbside[99] and HWRCs, as well as amongst municipal disposal routes. Local authority waste data is reported by WasteDataFlow (WDF) [100]. This is municipal waste data reporting completed quarterly by local authorities, which is validated by the WasteDataFlow team and the Environment Agency.

The questions relevant to WEEE, which were analysed by Anthesis, are presented in Annex C Four of the WDF questions analysed asked for the specific quantities of WEEE collected for recycling and reuse. This includes WEEE collected at kerbside and at HWRC's. This also specifically includes the reporting of SMW which is currently collected in kerbside collection schemes, akin to that proposed in policy option 2. This was reported as 2,278kt in the 2018/19 reporting[101].

Further to the questions on recycling and reuse, question 23 (in WDF) asks for reports on tonnages of waste collected for disposal. Utilising Waste and Resources Action Programme (WRAP)[102] composition analysis, we assume that 19% of general bulky waste collected for disposal is WEEE[103], and of the remaining collected residual waste, 1% is WEEE[104]. For other collections[105] (as per the UK recycling rate reporting calculations), 40% of this figure is assumed to be recycled. This has been calculated by Anthesis based on the remaining tonnage recorded as recycled but not captured by bulky WEEE collections; needed to meet the 56% recycling rate recorded.

5.4 Distributors

Distributors (i.e., retailers and distance sellers such as those selling online) are obligated under Regulation 43 to provide a collection service for WEEE. This includes both WEEE items collected

[97] Anthesis, Evidence Gaps Report, 2022
[98] The decision was made to use the full financial year rather than combining 2018/19 and 2019/20 to ensure there's no discrepancies in how the data's reported.
[99] 86 LAs currently collect WEEE via kerbside collections: Page 7, https://static1.squarespace.com/static/5a60c3cc9f07f58443081f58/t/624309e80a326b69a211ca3c/1648560627060/Material-Focus-Update-to-A-Review-Economic-and-Environmental-of-Kerbside-Collections-for-Waste-Electricals-March-2022.pdf
[100] https://www.wastedataflow.org/
[101] WasteDataFlow
[102] https://wrap.org.uk/
[103] https://preprod.wrap.org.uk/sites/default/files/2020-09/WRAP-UK%20bulky%20waste%20summary_0.pdf
[104] This proportion ranges within composition studies from 0.9% to 1.4 % for non-LA and LA collected residual waste respectively. (https://wrap.org.uk/sites/default/files/2020-11/WRAP-National%20municipal%20commercial%20waste%20composition_%20England%202017.pdf)
[105] All waste, not just WEEE

from households, and items taken in to stores by households. This analysis assumes that all WEEE which is collected by retailers under this regulation is recycled, apart from 5% which is reused[106].

The associated data is compiled by Approved Authorised Treatment Facilities (AATFs) and is published by the EA on a quarterly basis. As seen in table 3 below, the majority of these collections were LHA (66%) or cooling equipment (31%).

Table 3: Tonnages of household WEEE collected under Regulation 43 (tonnes, 2019)[107][108]

Large Household Appliances	85,332
Small Household Appliances	2,210
Display Equipment	1,395
Cooling Appliances Containing Refrigerants	40,948
Total	129,885

5.5 Baseline flows of WEEE

The recycling, reuse, and disposal tonnages described for local authorities and retailers are combined below. For the tonnages seen in disposal routes, this impact assessment assumes a split of 70% being sent to EfW (recovery) and 30% to landfill which is assumed to remain constant across the appraisal period[109]. This data point split of residual waste destination is based on residual waste flow modelling undertaken by Anthesis. This estimates 28-30 Mt of local authority collected waste and commercial and industrial residual waste (municipal like) with 21 Mt of EfW capacity (operating at 95% utilisation). This estimates 70% residual waste to EfW and the remainder to landfill (30%)[110].

Accumulating these collection routes provides the baseline for WEEE in 2019 in the UK, presented in table 4 below. These have been summarised in to the four WEEE categories used throughout this IA.

Table 4: Baseline flows of WEEE (tonnes, 2019)

Tonnage to reuse	LHA	21,760	96,246
	SMW	54,181	
	Display	17,777	
	Cooling	2,528	
Tonnage to recycling	LHA	305,380	767,195
	SMW	227,831	
	Display	58,942	
	Cooling	175,041	
Tonnage to recovery (EfW)[111]	LHA	160,777	458,760
	SMW	238,632	
	Display	14,113	
	Cooling	45,239	
Tonnage to landfill[111]	LHA	68,904	196,612
	SMW	102,271	
	Display	6,048	
	Cooling	19388	

[106] Anthesis, Evidence Gaps, 2022, page 71
[107] Note there is also 'Gas Discharge Lamps and LED Light Sources' and 'Photovoltaic Panels' reported in these tonnages which are out of scope of this analysis due to the specific complexities involved with managing the disposal of these items.
[108] Waste electrical and electronic equipment (WEEE) in the UK, WEEE collected in the UK. Waste electrical and electronic equipment (WEEE) in the UK - GOV.UK (www.gov.uk).
[109] Anthesis, Evidence Gaps 2022, page 106
[110] Anthesis, Evidence Gaps, 2022, page 106
[111] This includes some WEEE collected through recycling routes but separated for residual disposal (hence higher than the c450kt of WEEE disposed of through residual route in the summary section)

5.6 Growth rate

In this impact assessment, our baseline covers the period from 2019 to 2034[112]. We have assumed a 3% annual growth rate for WEEE arising across the period.

Using historical analysis and waste industry research, Anthesis modelling of general total waste arisings suggests an annual growth rate of 0.5%-1.5%[113]. However, in researching the WEEE and EEE industry specifically, their research suggests growth rates of WEEE arisings of 3-7%. For example, the consumer electronics market in the UK is forecast to have annual growth of 2.9% in the period 2020-26[114] but the revenue growth of the UK electronics sector is forecast to show annual growth of 7.3% in the period 2022-25[115]. This impact assessment therefore assumes a moderate estimate of the industry specific data, of 3%.

With this growth rate considered, the baseline across the appraisal period is presented below.

Table 5: Baseline tonnages collected across appraisal period (tonnes, with growth rate applied – with 3% growth rate applied to all four streams)

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Reuse	114,922	118,370	121,921	125,579	129,346	133,226	137,223	141,340	145,580	149,948
Recycling	916,071	943,553	971,859	1,001,015	1,031,046	1,061,977	1,093,836	1,126,651	1,160,451	1,195,264
Recovery (EFW)[116]	547,784	564,218	581,144	598,578	616,536	635,032	654,083	673,705	693,917	714,734
Landfill	234,765	241,808	249,062	256,534	264,230	272,156	280,321	288,731	297,393	306,314

A point of interest is that WEEE does not directly reflect the tonnages of EEE placed on market because of consumer behaviour involved in EEE purchases. This includes retention, reuse, hoarding as well as that which is disposed of. Therefore, the amount of WEEE in a given year is the result of:

- EEE bought and disposed of within the year.
- WEEE which is disposed of as a result of purchasing new EEE.
- EEE that is disposed of without being replaced by a new item.

Despite this, the tonnages of EEE placed on the market (POM) have been presented below to provide a scale of the industry, and to cross check the scale of each category.

The total tonnages of EEE placed on the market have been drawn from the work undertaken by Anthesis for Material Focus and have been cross checked against the latest reported figures under producer obligation systems[117]. These systems report the EEE placed on the market by their members annually as part of existing regulations[118].

Table 6: Baseline placed on market data and assumed WEEE flows (tonnes, 2018/9)[119]

[112] This is because the proposed policies are implemented from 2025 and the appraisal period is from 2025 to 2034 (a 10-year appraisal period as per Green Book guidance)
[113] As above
[114] https://www.researchandmarkets.com/reports/4854842/united-kingdom-consumer-electronics-market-size
[115] https://www.statista.com/outlook/dmo/ecommerce/electronics/united-kingdom
[116] It is assumed that there would be sufficient EfW capacity for this additional WEEE. Evidence suggests that although UK EfW has historically run at around 90% capacity, there was still around 2Mt of spare capacity in 2020 (https://www.tolvik.com/wp-content/uploads/2021/05/Tolvik-UK-EfW-Statistics-2020-Report_Published-May-2021.pdf)
[117] https://www.gov.uk/government/statistical-data-sets/waste-electrical-and-electronic-equipment-weee-in-the-uk#:~:text=Updated%20WEEE%20collected%20in%20the,treatment%20facilities%20and%20approved%20exporters.&text=All%20reports%20updated%20to%20include%20quarter%201%20to%204%202019%20data.
[118] https://www.gov.uk/government/statistical-data-sets/waste-electrical-and-electronic-equipment-weee-in-the-uk#:~:text=Updated%20WEEE%20collected%20in%20the,treatment%20facilities%20and%20approved%20exporters.&text=All%20reports%20updated%20to%20include%20quarter%201%20to%204%202019%20data
[119] Anthesis, Evidence Gaps, page 24

WEEE Category	Tonnage POM	Tonnage Entering WEEE stream (all waste destinations)
Large Household Appliances	571,432	561,657
Small Household Appliances	157,442	154,749
IT and Telecoms Equipment	152,049	149,448
Consumer Equipment	48,098	47,275
Lighting Equipment	45,847	45,063
Electrical and Electronic Tools	97,429	95,763
Toys Leisure and Sports	55,394	54,446
Medical Devices	17,197	16,903
Monitoring and Control Instruments	34,147	33,563
Automatic Dispensers	5,669	5,572
Display Equipment	90,984	89,427
Cooling Appliances Containing Refrigerants	240,819	236,700
Gas Discharge Lamps and LED Light Sources	9,943	9,773
Photovoltaic Panels	19,205	18,876
Batteries	41,000	40,299

Section 6: Key Cross-Cutting Assumptions

Many of the assumptions used within the Cost Benefit Analysis (CBA) are used across a number of options. For ease of understanding, these cross-cutting assumptions are outlined here. Any option specific assumptions are described within that particular option.

Cross-cutting assumptions included within this section are listed below:

- 6.1 Scheme Administrator and Enforcement Costs
  - 6.1.1 Scheme Administrator costs
  - 6.1.2 Enforcement costs
- 6.2 Collection and Treatment Costs (and Benefits)
  - 6.2.1 Treatment costs
  - 6.2.2 Residual costs
  - 6.2.3 Household communications campaigns
  - 6.2.4 Material Revenue
- 6.3 Tonnages
  - 6.3.1 Fly-tipping modelling and costs
  - 6.3.2 Hoarding
- 6.4 Societal Impacts
  - 6.4.1 Carbon analysis
  - 6.4.2 Fly-tipping Disamenity

6.1 Scheme Administrator and Enforcement Costs

6.1.1 Scheme Administrator costs

With the introduction of the proposed policy options, it is suggested in the consultation document, alongside this impact assessment, that a Scheme Administrator may be best placed to manage the proposed obligations placed on producers. An approach presented in the consultation document is an administrator, jointly approved by the four governments, be responsible for managing and administering specific functions of the revised WEEE system on behalf of producers and other parties. Views are being sought in this consultation on the exact responsibilities of the Scheme Administrator.

For the purpose of this impact assessment, we assume a similar system to that of the Packaging Extended Producer Responsibility (pEPR) impact assessment analysis[120]. The pEPR Scheme Administrator's scope includes managing data, taking on the legal responsibility for collections, and making necessary arrangements with local authorities, and others, for the provision of collections. This is felt to be a reasonable proxy at this stage of the impact assessment analysis.

The costs associated with a Scheme Administrator, presented in the pEPR impact assessment, include set up costs and annual operational costs for offices, admin, and staff. These costs were derived by WRAP specifically for the pEPR analysis[121].

The pEPR costs have been adjusted relative to the number of producers associated with pEPR and WEEE policies, respectively. Since the number of producers in the EEE industry is approximately one third of the number of producers affected by the EPR policies[122], the Scheme Administrator costs are assumed to be around a third of those estimated under pEPR. This is a simplifying assumption used for illustrative purposes, based on limited data (and information on the final design of the scheme administrator). It is acknowledged that economies of scale may mean that scheme administrator costs would not fall proportionately based on the number of producers. These assumptions will be tested through the consultation process.

The set-up costs include office costs, non-labour HR costs, and interim team costs. These represent the cost of setting up physical offices in each nation of the UK, and the staff to support the introduction of the scheme administrator. These initial set-up costs are assumed to occur in 2025, the first year of appraisal.

Table 7: Scheme Administrator Set Up Costs (2025, £2019)

Set up costs (2019)	£393,900

Beyond this, there are annual operational costs associated with a Scheme Administrator, which include office costs, admin costs, and staff costs. The office costs include the cost of the premises, ground rent and other utilities, security, cleaning, and maintenance. Admin costs include audit and tax, legal, insurance, and other professional fees. Staff costs include the salaries of staff included in producer, LA, and admin roles, and the associated overheads[123]. These costs are all assumed to remain constant over time and to occur annually across the entire appraisal period.

Table 8: Scheme Administrator Annual Operating Costs (annually 2025-34, £2019)

Annual office operational costs (£2019)	£383,486
Annual admin operational costs (£2019)	£516,103
Annual staff operational costs (£2019)	£3,589,243
Total SA operational costs (£2019)	**£4,488,831**

6.1.2 Enforcement costs

We anticipate minimal additional costs arising in relation to the enforcement of our proposed reforms. This is because we are not proposing to obligate any new parties (beyond online marketplaces) but are to strengthen the obligations of parties who are already obligated under the existing regulations. This assumption was discussed with the Environmental Agency who confirmed that it was a reasonable assumption to make.

Registered producers are currently required to pay an annual registration fee by the relevant environment agency, charged on a cost recovery basis. Any changes to the cost of compliance

[120] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063588/epr-final-impact-assessment.pdf
[121] "What is a likely cost for an EPR Scheme Administrator?" WRAP (unpublished)
[122] The pEPR impact assessment assumes that c.10.5k could be obligated under pEPR in one form or another. This is in comparison to c.3.1k WEEE producers (this excludes WEEE producers categorised as B2B only).
[123] Including non-wage labour costs

monitoring would be reflected in changes to the current registration fees to ensure that those costs did not fall on the relevant regulators.

Whilst the proposal to classify online marketplaces as producers will require regulators to ensure that this new category of producers are registered and supplying data, the regulator will have powers to recover their costs of compliance monitoring from those businesses via a registration fee. It should also be noted that the consequence of this proposal will be to remove from the regulatory requirements those overseas businesses that access the UK market via OMPs – thus, in overall terms, the number of businesses classified as producers with whom the regulator is required to engage with, will fall. There is no intention to widen the distributor obligations to a wider classification of businesses and so in a similar vein we do not envisage significant new costs for the regulator. That said, there will be familiarisation costs for the regulators and potentially some updates to IT systems that may be necessary, but we expect these to be minimal. These costs will be investigated further through the consultation process.

The relevant environment agencies would be responsible for monitoring and enforcing the scheme administrator in their duty to collect WEEE from households on behalf of producers, as well as responsibly recovering costs from producers. This would likely be akin to the way that these regulators monitor producer compliance schemes (who similarly have responsibility for collecting WEEE on behalf of their producer members from HWRCs, and recovering costs) under the current regulations, and hence the assumption that this would not lead to additional costs to regulators. However, the exact role of the Scheme Administrator, and its interaction with regulators, will be developed further based on the outcomes of the consultation. Monitor and enforcement cost assumptions will be reviewed as decisions are taken and updated (where necessary) for the final impact assessment.

6.2 Collection and Treatment Costs (and Benefits)

6.2.1 Treatment costs

Each policy option will result in a diversion effect away from either landfill or recovery. This has been modelled by Anthesis[124] for this impact assessment. An increased amount of WEEE collected for recycling will result in increased treatment costs. It is important to note that we expect that this diversion would also lead to an increase in reuse, as well as recycling. However, at present, there is an absence of data which analyses the costs of sorting WEEE for reuse beyond the costs associated with collecting it. This section will therefore outline the specific costs of treating the WEEE collected for recycling.

As part of our analysis, we have used cost per tonne figures provided by external stakeholders with expert knowledge of the UK WEEE recycling sector. These cost per tonne figures can be seen in table 9 below.

Table 9: Net Treatment Cost per Tonne of WEEE (£/t 2019)

Category of WEEE	Cost/t (2019 £'s)
LHA	£5
SMW	£75
Display	£260
Cooling	£190

Source: provided by industry source. Rounded to the nearest £5

[124] Anthesis, Evidence Gaps, 2022

These treatment costs per tonne include transporting the WEEE from HWRCs or other collection points, to the treatment facility, treating the WEEE, container costs, and any hazardous waste costs. The cost also includes landfill and EfW gate fees to recycling treatment facilities[125]. However, it does not include the cost of a LA or retailer collecting the WEEE, this cost is analysed separately. It is important to note that because of the way the data is collected and was subsequently provided to us, it is not possible to provide a disaggregated cost per tonne for each step of the treatment process.

It is noticeable from table 9, that the cost per tonne to treat LHA is much lower than the other categories of WEEE. Though the overall process operates at a small net cost per tonne, the treatment part of the process currently results in a receipt of revenue, due to the value of the recycled materials[126]. Note that this revenue is primary material revenue; this being the price waste reprocessors are willing to pay for collected material, which they use as inputs to the recycling process. Reprocessors can then turn this material into a virgin-material-like-state to be sold on the secondary material market, to be used as input for manufacturing new goods. It is important to distinguish that there are essentially two material revenue effects occurring in this IA. The primary revenue benefits are included in the treatment cost per tonne figures used. The secondary material revenue to reprocessors for selling this material post-reprocessing, are included as a separate benefit to reprocessors and described later in this section.

6.2.2 Residual Costs

There are costs associated with depositing waste at landfill and EfW sites. This is generally through landfill and EfW gate fees which are a charge levied per tonne of waste received at a waste site. This fee covers the costs incurred by the site for dealing with that waste. For the purposes of this IA, we have used the gate fees from WRAP's gates fees report 2019[127].

Table 10: Landfill and EfW Gate Fees by Waste Treatment

	Cost/t (2019 £'s)
EFW	£93
Landfill (excluding Landfill Tax)	£25

Source: WRAP

Landfill tax will also be charged on top of any landfill gate fee and is charged on a per tonne basis. As 2019 is our baseline year, we use the 2019 landfill standard tax rate of £91.35 per tonne of waste sent to landfill for our analysis. We assume that landfill tax will not increase in real terms[128].

Anthesis have modelled the tonnage diversions of WEEE away from landfill and recovery, to recycling and reuse, as a result of implementing policy options 2-4[129]. Multiplying these tonnages by the landfill tax rate provides an estimate of the total reduction in this tax revenue for HM Treasury. This total tax reduction will be a cost transfer from waste collectors to HM Treasury as waste collectors will no longer be liable to pay as much landfill tax as they currently do. As this will be result in a reduction of tax revenue for HM Treasury, this effect will not contribute to any net cost/benefit figures (however it will be a saving to businesses in the EANDCB).

Similarly, we can use Anthesis's modelling of the total WEEE diverted away from landfill and EfW to calculate the total landfill and EfW gate fee savings for waste collectors. This provides cost savings to local authorities, from reduced landfill and EfW gate fees, as less WEEE is collected as residual waste. The benefits from landfill and EfW gate fee savings will be achieved for each

[125] External partners confirmed to us the treatment cost per tonne includes landfill and EfW gate fees.
[126] Detail provided by external partners in industry confirming the nature of low treatment cost per tonne seen for the LHA category of WEEE.
[127] WRAP, Gate Fees 2019/20 Report, page 4
[128] I.e. once the impact of future inflation is removed
[129] Anthesis, Evidence Gaps Research, 2022

of the policy options (2-6), with each marginal impact of the option providing greater landfill and EfW gate fee savings as each policy provides additional diversion away from landfill and recovery. With the options presented cumulatively in this way, option 6 will encapsulate all cost and benefits from policy options (2-6) inclusive.

6.2.3 Household communications campaigns

Research by WRAP and Zero Waste Scotland shows that good communications campaigns are key to successful recycling schemes[130]. Research by Material Focus has shown that communications campaigns can specifically increase the effectiveness of WEEE recycling services. Their research suggests that 42% of people who saw their 2020 WEEE recycling advertising campaign either started to recycle, or recycled more, WEEE as a result[131]. The research also showed that targeted communications in one Local Authority area led to a 100% increase in recycling rates[132].

The exact nature of any communications campaigns would need to be agreed by producers but could include a mix of nationwide and local specific elements to maximise success. Organisations such as WRAP[133], and Zero Waste Scotland[134] provide detailed guidance on setting up successful recycling communications campaigns.

For the purpose of the impact assessment, communication costs have been split into transition costs, which consist of a significant wave of communications that occur in the first year of the policy to introduce it, and ongoing communication costs. It is assumed that communication costs in Option 2 and 3 will be the same as, under both options, producers will need to communicate the difference between small and bulky WEEE and how households should dispose of each. The only difference if Option 3 is implemented as well, is amendments to how and where bulky WEEE should be disposed of. Since communications about how to dispose of bulky WEEE will occur under both Option 2 and 3, we have not accounted for additional communication costs under Option 3[135].

For Option 4, additional costs are expected to be minimal and so have not been quantified in our cost and benefit analysis. In-store retailers are currently obligated to communicate to customers in writing how to recycle their products. Generally, this is done on their websites. Under Option 4, this communication will move to the point of sale[136]. Retailers may incur an initial cost for this change; however, the cost should be minimal as it does not consist of additional communication campaigns but simply marginally adapting the current communications. Exactly how retailers will be affected by this change will be explored at consultation.

Similarly, most online retailers already offer a charged 1:1 takeback service which they communicate to customers. If Option 4 is implemented, this communication will just need to change to clarify that the service is free. This change in messaging on websites should be of minimal cost to producers so it has not been quantified; producers will be asked about this communication change in the consultation.

Communication costs were modelled by circular economy consultants Oakdene Hollins and used a fixed cost per household amount taken from a Zero Waste Scotland study[137], which specifically considered improving recycling rates through communication campaigns[138]. These costs were

[130] https://www.materialfocus.org.uk/report-and-research/encouraging-battery-recycling-reduce-fires/
[131] https://www.letsrecycle.com/news/material-focus-adverts-help-increase-weee-recycling/
[132] https://www.materialfocus.org.uk/press-releases/material-focus-publishes-first-annual-review/
[133] https://wrap.org.uk/taking-action/collections-recycling/key-operational-areas/communications-guidance
[134] https://www.zerowastescotland.org.uk/resources/communications-support-local-authorities
[135] This will be tested at consultation
[136] I.e., the customer is made aware when they purchase a product (for example by clear signage at the till). Currently it is not specified where retailers must provide this information to customers and so this may not be communicated in a prominent location (for example, a less prominent part of their website).
[137] https://www.zerowastescotland.org.uk/sites/default/files/Improving%20Recycling%20Through%20Effective%20Communications_ZWS_0.pdf
[138] This report is somewhat specific to Scotland. We plan to do further analysis to ensure these costs are representative of the UK as whole for the final impact assessment.

adjusted to a 2019 price level[139]. The transition costs are assumed to be an average of £1.49 per household. Oakdene Hollins recognise that LAs would face different communication costs based on their size. The transition cost of £1.49 per household is an average, and accounts for smaller LAs paying £1.19 per household and larger LAs paying £1.79 per household. The ongoing costs are assumed to be £0.50 per household per year. This is based on WRAP's "routemap" modelling for the pEPR impact assessment. These costs are shown below in table 11.

Table 11: Communication costs per household

Cost	Cost of Communications per Household (£)
Transition (Year 1)	£1.49
Ongoing (Yearly)	£0.50

The responsibility to communicate the policies will be borne by the scheme administrator and paid for by producers. The assumptions and analysis on how the scheme administrator can be found in the section on Scheme Administrator costs.

There is an appreciation that there are a number of methodologies on communicating new policies to households. The differing potential communication cost methodologies will be explored in the sensitivity analysis section of the annex and reviewed for the final impact assessment.

6.2.4 Material Revenue/ Profit to Reprocessors

EEE is a diverse category of products, but the material used within each item is broadly similar. When WEEE is correctly managed and disposed of, most of these materials can be recycled, or reused rather than ending in EfW or landfill.

In this impact assessment, we assume that when WEEE is recycled, these materials are used in closed-loop recycling[140]. This is where the recycled materials are utilised to make another item, the material does not necessarily need to be used in a WEEE item, but the recovered material must be used in the same form. For example, recovered plastic from WEEE is used in a hard form plastic rather than as a substitute for textiles, and this is typically the case for metals[141].

The average material composition of WEEE has been derived from a review of European WEEE value chain analysis[142]. This includes metals, plastic, glass, and other materials, which will encapsulate some of the critical raw materials. Due to data limitations, this impact assessment has simplified these materials to the four most present in EEE: iron/steel, aluminium, plastic, and glass, presented below in table 12. These materials are shown to make up 80% of the average item of WEEE, however are scaled up to 100% for the purpose of this analysis[143].

Table 12: Material make up of a typical tonne of WEEE[144]

Material	% Makeup of a typical tonne of WEEE
Iron/Steel	55%
Aluminium	11%
Plastic	26%
Glass	7%

[139]Oakdene Hollins, A Review (Economic and Environmental) of Kerbside Collections for Waste Electricals, 2021 – consultants have calculated and provided the adjusted 2019 prices for communication costs.
[140] Under advice from WRAP.
[141] Note, it is understood through conversations with the AATF industry that WEEE is managed in a way where the material would typically not be used in a WEEE item again. But through conversations with WRAP, we've confirmed that this would still be considered closed-loop recycling when the material is made in the same format regardless of whether it is the same product.
[142]https://ec.europa.eu/research/participants/documents/downloadPublic?documentIds=080166e5ac195926&appId=PPGMS#:~:text=2.2%20COMPOSITION%20OF%20WEEE,-Electric%20and%20electronic&text=Base%20metals%2C%20the%20most%20common,Materials%2C%20CRM2)%20for%20EU
[143]The remaining 20% is made up of copper, gold, silver, palladium and unspecified other. These are excluded from the analysis due to a lack of evidence on material prices and GHG emissions
[144] May not add up to 100% due to rounding

This impact assessment assumes that the above proportions of material are constant across each category of WEEE, and overtime. Therefore, an increase in the quantity of recycling of WEEE provides an increase in the quantity of recycled iron, aluminium, plastic, and glass materials. This is a simplifying assumption based on the available data. We also assume that the composition of WEEE will not change over time which, again, is a simplifying assumption. We will consider conducting further work to account for differences between different types of WEEE.

The material is then sold in the secondary material market to be used in the production of a new item. Secondary material market prices are taken from a report by waste sector consultants Valpak[145]. Valpak's analysis was conducted in 2019 and like other commodities markets prices can fluctuate significantly. Valpak's analysis is seen as the most appropriate as it specifically relates to recycled material prices and brings together a number of material types into one common methodology. Although no known updates exist to this analysis, other sources suggest that secondary prices for these materials in 2022 were either at a similar level or higher than those in Valpak's report[146]. For example, this is particularly prevalent in the recent significant increases in oil prices, which influences the prices of recycled plastic[147]. For the purpose of this impact assessment, we assume there is no real terms increase in secondary material prices, ensuring that the analysis for this impact assessment at worst uses conservatively low prices. Table 13, below, presents the prices this impact assessment is using for the steel, aluminium, plastic, and glass recycled material.

Table 13: Price per tonne of each material (£2019, £/t)[148]

Recycled Material	Price per tonne (£2019, £/t)
Steel	£560
Aluminium	£1,578
Plastic (average polymers)	£884
Glass (clear)	£50

The price of iron is not included in Valpak's Report, so it is assumed that the steel price is representative of all iron and steel recycled from WEEE[149]. The plastic price used is an average across polymers, in the absence of being able to identify a clear understanding of the type of plastic used in EEE products, industry experts have advised that this can be assumed to be the appropriate recycled plastic price for recycled plastic recovered from WEEE. The price of glass varies dependent on the colour; however Valpak's report only presents a single price point for glass.

The prices per tonne of recycled material are used to calculate the additional revenue produced in the secondary materials market from the net increase in recycling associated with the policies. To accurately include this in our impact assessment analysis, we have only included the proportion of these sales which would account for the profit gained from the sale. This is done in order to avoid double counting, since some sale of the recycled materials has already been accounted for in our understanding of the treatment costs associated with managing WEEE[150]. To account for this, we have assumed that there is a gross margin of 25% for UK based recyclers. This has been assumed based on data from the Annual Business Survey (ABS)[151] and calculated

[145] Valpak, The impact of proposed packaging policy reforms on the UK's secondary materials markets, 2019 (Unpublished)
[146] Plastic: Sustainable Plastics data suggests that recycled plastic prices fell from 2019 into 2020 and 2021, but increased significantly into 2022 such that 2022 prices are higher than those in 2019 (https://www.sustainableplastics.com/topic/polymer-prices); Glass: Euorstat data shows European glass secondary material prices remaining relatively constant over the past decade with the 2021 price at 65 Euros (£56) per tonne (https://www.letsrecycle.com/prices/metals/non-ferrous-metal-prices/non-ferrous-metal-prices-2022/) ; Metals: Lets recycle show scrap Aluminium and Steel categories to be generally higher in 2022 than in 2019 (https://www.letsrecycle.com/prices/metals/)
[147] https://www.plasticexpert.co.uk/oil-prices-plastic-recycling/#:~:text=There%20is%20a%20direct%20relationship,of%20making%20plastic%20also%20decreases.
[148] Valpak, The impact of proposed packaging policy reforms on the UK's secondary materials markets, 2019 (Unpublished)
[149] As steel is a type of iron alloy, however further research will be conducted for the final impact assessment to account for materials which we currently have no information on price
[150] Any primary revenue to collectors from selling WEEE to recyclers.
[151]https://www.ons.gov.uk/businessindustryandtrade/business/businessservices/datasets/uknonfinancialbusinesseconomyannualbusinesssurvey sectionsas

as GVA divided by turnover[152] for the UK recycling sector[153]. The results of these calculations, tonnages of recycled material by price per tonne by profit margin, are presented in each policy options cost benefit analysis summary in section 7.

It must be acknowledged that because of data limitations and huge variability in the material composition of WEEE, the material composition in table 12 does not include all of the critical raw materials, particularly some rarer, high-value materials, which are used in EEE. Therefore, the estimated profits to reprocessors in our cost-benefit analysis are likely to be an underestimate of the potential profits available to reprocessors from the materials found in WEEE if CRMs are recovered. The review of European WEEE value chain analysis lists several CRMs that can be found in WEEE, including gold, silver, indium, gallium, cobalt, silicon, and other rare earth elements[154]. A review of CRM recovery by Material Focus[155], found that in PCs, laptops, tablets, TVs, monitors, smart phones, and lighting sent for recycling in 2017, there was £11.37 million worth of critical raw technology metals (which includes cobalt and nickel) and £126.5 million worth of gold and silver.

However, CRMs usually make up a small proportion of WEEE compared to other materials[156], which can make it difficult to efficiently recover such materials in a cost-effective manner. Nevertheless, gold and palladium, which make up of relatively low proportion of the weight WEEE, are the most valuable metals for recovery. According to the market price of gold, a tonne of gold in 2019 was worth £31,000,000, which is significantly higher than the prices of the materials in table 13.

Also, due to potential future supply scarcity and lack of substitution options, the future value of CRMs could rise significantly, making it economically viable to recover even small volumes of CRMs[157]. However, currently most categories of WEEE are expensive to recycle such that revenue from recovering materials in itself does not incentivise recycling.

6.3 Tonnages

6.3.1 Fly-tipping modelling

It is assumed that households that choose to fly-tip often do so because of the costs and/or lack of convenience of WEEE disposal/collection. By addressing these factors, the proposed policies are likely to have some effect in decreasing the amount of WEEE being fly tipped.

Based on their research, Anthesis estimate that the introduction of free kerbside collection of bulky WEEE will result in a 10%-15% reduction in fly-tipping of WEEE[158], with the lower end of this range used within this impact assessment modelling as a conservative estimate. This was established through discussions with local authorities, which included a survey of 12 local authorities, as well as interviews.

The surveys focussed on local authorities that currently run a bulky waste collection service who had either changed the price charged for that service, or had gone from a free, to a charged service. The majority of LAs surveyed were in the latter position, and they found that although increases in the price charged for these collections had led to a decrease in the demand for these collections, the increased charges appeared to have had a minimal impact on fly-tipping in the

[152] Average between 2015-2020
[153] SIC 38.3 – Material Recovery
[154] https://ec.europa.eu/research/participants/documents/downloadPublic?documentIds=080166e5ac195926&appId=PPGMS#:~:text=2.2%20COMPOSITION%20OF%20WEEE,-
[155] Contributing-towards-a-circular-economy-utilising-Critical-Raw-Materials-from-Waste-Electricals-Final.pdf (exactdn.com)
[156] https://ec.europa.eu/research/participants/documents/downloadPublic?documentIds=080166e5ac195926&appId=PPGMS#:~:text=2.2%20COMPOSITION%20OF%20WEEE,-
[157] Contributing-towards-a-circular-economy-utilising-Critical-Raw-Materials-from-Waste-Electricals-Final.pdf (exactdn.com)
[158] Anthesis, Evidence Gaps, page 50.

area. However, there was one local authority that changed from a free service to a charged service and reported a 10% increase in fly-tipping incidents after this change.

Council officers interviewed felt that most fly tipped waste is a result of illegitimate waste collection companies, who can currently provide a cheaper and more timely service than LAs. A producer led approach would therefore need to outcompete these illegitimate businesses to have a significant impact on fly-tipping. Based on this research, Anthesis conclude that some small reduction in fly-tipping could be achieved as a result of free bulky WEEE collections, which could be enhanced by targeted communications campaigns funded by producers (which is assumed as part of option 3).

Based on this research, we assume that a similar level reverse in the amount of flay tipping would occur were the service to return to free to customers. We assume this 10% reduction is from households who are seen to be price-sensitive to their methods of disposal. It is also reasonable to suggest that there is potential that additional WEEE would be diverted away from fly-tipping with adequate communication of the policy. This is explored in annex D, in the sensitivity analysis.

We assume that this 10% reduction in fly tipped WEEE will occur in options 3 and 4, irrespective of the additional collection route seen in option 4. As stated previously, it is assumed that no small electrical items of WEEE are fly-tipped (due to having more convenient disposal methods), and there is therefore no impact on fly-tipping as a result of option 2. We currently lack the evidence to suggest that the take-back addition to policy option 4 would have an additional impact on fly-tipping compared to option 3. We do, however, assume that take-back would have the same impact on fly-tipping in the absence of LA bulky WEEE collection due to it providing an additional free bulky WEEE collection service compared to the baseline, therefore, providing households less of an incentive to use illegitimate waste collectors.

6.3.2 Hoarding by households

DEFRA have used research by Anthesis on WEEE flows, which determines the level of diversion associated with each of the proposed policies. The policies are assumed to divert waste away from various disposal routes. For example, WEEE could be diverted away from the informal sector (fly-tipping, scrap dealer collections), residual waste, HWRC deposits, etc. However, we have assumed within this analysis there is no disposal occurring from “hoarded” material[159].

There has been research which suggests that households hoard electrical items[160]. However, it is difficult to know whether these items will be diverted to waste streams because of these policies. Another key difficulty is understanding how much hoarded EEE is considered waste. This is because although individuals might hold on to old electricals which they no longer use as a primary item (for example, keeping an old phone), it does not mean that the item is considered waste by the household. For example, an individual may give their old phone to another family member or may keep it in case their new item breaks. Therefore, for the purposes of this analysis, we have assumed that all small electricals classed as waste are currently disposed of either in residual waste, HWRC deposits or under the current in-store take-back policy. In contrast, we assume that all electricals which are in the household hold a certain value and are not considered waste[161].

This would also seem like a reasonable assumption for larger bulky WEEE items (from households), as is in most cases households will not have enough room to hoard bulky waste. Households will likely only buy an additional unit of bulky EEE, without disposing of any current EEE, if they intend to use this item in addition to ones that they already own. We therefore assume there will be no hoarding of bulky WEEE under any option (including the baseline). These

[159] Anthesis, Evidence Gaps, 2022
[160] Anthesis, Electrical Waste – Challenges and Opportunities: An independent study on Waste Electrical & Electronic Equipment (WEEE) flows in the UK, 2021
[161] This is a simplifying assumption. More convenient collection routes may encourage households to part with currently hoarded products.

assumptions were discussed with consultants from Anthesis[162], who agreed that they are the most reasonable assumptions for the analysis.

6.4 Societal Impacts

6.4.1 Carbon analysis

The greenhouse gas emissions analysis for this impact assessment considers the journeys involved in the collection of WEEE items, as well as the net increase, or decrease, in carbon emissions from the changes in WEEE flows to recycling, reuse, energy from waste, and landfill. To monetise these impacts, the central BEIS carbon factors are used[163]. Following the UK's Emissions Trading System (ETS) replacing the EU ETS, there was a review of BEIS carbon prices, and as a result, there is no difference between 'traded' and 'non-traded' carbon prices[164]. As part of this review, new carbon prices were released, and it is BEIS guidance that these emissions have the same price per tonne, so that there is equal weight for emissions from the two sectors.

The published BEIS carbon prices are presented as pound-per-tonne values in 2020 monetary terms, so for this impact assessment they have been discounted to 2019 values and are presented as such in table 14 below.

Table 14: Applied carbon prices, 2019, £/t, CO_2e (rounded)

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
Central carbon per ton (£2019)	247	251	254	258	262	266	271	274	278	283

Territorial carbon analysis – changes in tonnage flows

The policies presented in this impact assessment are expected to result in changes to the flows of WEEE to reuse, recycling, and disposal, which will consequently have impacts on GHG emissions from WEEE. To assess the carbon dioxide emissions associated with changes in the waste flows of WEEE, this impact assessment analyses and monetises the carbon impact on UK territorial emissions of the changes in tonnages of WEEE that are sent to recycling, reuse, and disposal.

To provide an assessment of the carbon emissions associated with changes in WEEE waste flow, WRAP's 2017 carbon metrics are used, which provide a breakdown of the traded and non-traded carbon associated with different WEEE waste flows. However, WRAP does not provide WEEE specific carbon metrics for reuse, closed-loop recycling and EfW. This limitation in the data from WRAP is overcome by utilising a weighted carbon factor, based on carbon metrics for the materials which compose a typical tonne of WEEE, which is assessed below.

The material breakdown used is the same as that shown in table 12 in the material revenue section. To use the weighted average of material found in a typical tonne of WEEE, we assume that the tonnages of material in each waste flow are represented by the material composition of the typical tonne of WEEE. However, we recognise that the WEEE flow chain is likely to be more complicated than this, as WEEE items can be dismantled, with their separate components entering different waste flows. For example, an item of WEEE that is sent to recycling may be

[162] https://www.anthesisgroup.com/
[163] Valuation of greenhouse gas emissions: for policy appraisal and evaluation 2021, Annex 1, https://www.gov.uk/government/publications/valuing-greenhouse-gas-emissions-in-policy-appraisal/valuation-of-greenhouse-gas-emissions-for-policy-appraisal-and-evaluation#annex-1-carbon-values-in-2020-prices-per-tonne-of-co2
[164] Valuation of greenhouse gas emissions: for policy appraisal and evaluation - GOV.UK (www.gov.uk)

dismantled with metal components being recycled, and plastic components being sent to disposal because of flame-resistant chemicals making the plastic unrecyclable.

We also acknowledge that WEEE categories can be heterogenous, both in comparison to other categories of WEEE, and within each category, so the assumption that a typical tonne of WEEE is representative of all categories of WEEE is a simplification but it is the best that can be done with limited data.

For each material, WRAP provides carbon metrics for closed-loop recycling, EfW and Landfill. However, there is not enough data to provide a reuse metric. For the purpose of this impact assessment, we apply the recycling carbon factor to the WEEE items which are reused. This is likely to be an overestimate of the carbon associated with the reuse of WEEE (and is therefore an underestimate of the carbon benefits of increased reuse), as the process of reuse is likely to be more carbon beneficial than the recycling process, as it requires reduced processing, and does not include further manufacturing, so is less energy intensive[165]. There are also further benefits to reuse of WEEE, both socially, and economically, which are discussed in section 9.

For our cost benefit analysis, we measure the changes in territorial carbon emissions. To do this we focus on production emissions in the UK, assuming that once WEEE is broken down into the constitute materials, these enter the recycling system along with similar materials. For example, metal from WEEE is recycled alongside similar grade metal from other sources. For the production emissions, we use a method that is used by WRAP[166], who take trade data from Eurostat[167] to estimate the proportion of raw materials that are made in the UK. For the percentage of each material collected for recycling in the UK that is then recycled in the UK, we use data from WRAP, apart from for plastics where we used a study by Valpak[168] which includes estimates that are specific to plastic that is removed from WEEE. The proportion of each material sent to EfW in the UK compared to abroad is estimated using data from the most recent annual Tolvik UK EfW report[169] and data on the tonnage of residual exported from the UK for Refuse Derived Fuels (RDF)[170]. All materials collected for landfill are assumed to go to landfill in the UK. The reuse factor is assumed to be the same as recycling, except that we assume that WEEE displaces EEE production as opposed to virgin material production. WRAP, using data from Eurostat suggest that about 10% of WEEE is made in the UK.[171] These proportions are shown below in table 15.

Table 15: Proportion of virgin materials made, recycled, and disposed of in the UK

Waste Streams	Proportion made in the UK	Proportion recycled in the UK	Proportion to EfW in the UK	Proportion to landfill in the UK
Iron/ Steel (Scrap Metal)	70%	55%	87%	100%
Aluminium	70%	55%	87%	100%
Plastic (Average Plastics)	61%	76%	87%	100%
Glass (Colour Separated)	53%	72%	87%	100%

To calculate territorial emissions, the carbon factors, which have already been multiplied by the material breakdown of WEEE, are further multiplied by the proportion of material that is either made in the UK, recycled, or sent to landfill and EfW in the UK. The carbon metrics then consider increase in the carbon emissions released from the process of recycling, reuse, EfW or landfill,

[165] This assumption will be tested further through consultation
[166] WRAP – unpublished carbon factors modelling
[167] Eurostat – Import, Export and Sold Production data
[168] Valpak - The Impacts of Bans on UK Export of Plastic Wastes (unpublished) 2021
[169] https://www.tolvik.com/wp-content/uploads/2021/05/Tolvik-UK-EfW-Statistics-2020-Report_Published-May-2021.pdf
[170] https://www.letsrecycle.com/news/rdf-exports-fell-by-37-in-2020/
[171] WRAP – unpublished carbon factors modelling

and the carbon savings from emissions foregone from producing that same material for production and reduced reliance on production of raw materials. For example, recycling one tonne of metal from WEEE releases carbon in the sorting and treating process but it will provide around one tonne of metal for use in production[172], leading to carbon savings as there is no longer a need to produce one tonne of raw materials.

The territorial weighted averages of the carbon metric associated with each of the relevant material types are used to provide the carbon metrics of 2017 waste flows, presented in table 16.

Table 16: Territorial Weighted WRAP Carbon Metrics (2017)

			kgCO2e/ton	
Waste Flow[173]	Proportion which are traded	Proportion which are non-traded	Traded carbon factor	Non-traded carbon factor
Reuse	*100%*	*0%*	-231.12	-
Closed-loop recycling	100%	0%	-1119.03	-
Landfill	0%	100%	-	9.28
EfW	0%	100%	-	170.65

To calculate the net carbon impact of each policy option, these territorial waste flow weighted carbon metrics are multiplied by the respective change in tonnage of WEEE sent to each waste flow as a result of each policy option. To assess the impact of reuse and recycling, the production avoidance factor is presented as a carbon saving, and the carbon associated with reuse and recycling is subtracted from this. For landfill and energy from waste, the amount of WEEE sent for disposal is split amongst these routes, with 70% assumed to be sent to EfW and the remaining 30% to landfill[174].

Finally, the net carbon tonnages associated with the changes in waste flows from each policy option have been monetised with the BEIS carbon prices presented in table 14, and the results are presented in the relevant cost benefit analysis sections for each policy in Section 7.

It must be acknowledged that by using territorial carbon factors, we are underestimating the total carbon benefits that will be felt by society. There will be international carbon emission savings from the policy options that will be beneficial to people both in the UK and internationally, as reusing and recycling WEEE decreases the international reliance on raw material extraction and production and the associated emissions. However, our cost-benefit analysis considers just the territorial changes in carbon emissions.

Carbon analysis – increased fuel

Additional fuel uses (and relating Co2e emissions) are estimated in two different ways, depending on the specific impact of the policy option. For SMW collections and retailer takeback, policies introduced in options 2 and 4, it is assumed that no additional journeys will be made due to the policy, rather, the weight carried on these journeys will increase[175] (due to additional WEEE

[172] There are likely to be some losses in the recycling process however due to a lack of data this has not been included in the analysis
[173] The reuse and recycling factors include both the emissions from the recycling/reuse process and saved production emissions.
[174] Anthesis, Evidence Gaps, 2022, page 106
[175] Option 2 assumed that small mixed WEEE will be collected from household alongside existing Dry Mixed Recycling collections. Option 4 assumed that retailers delivering new EEE products to household will take collect used products as WEEE during the same journey.

collected). It is assumed that as the load weight of a collection vehicle increases, the Miles per Gallon (MPG) achieved will decrease.

The assumption used to measure this impact is taken from the Oakdene Hollins analysis. We are utilising the assumption presented in their report, that a 0.33% improvement in MPG is achieved from a 1% reduction in weight[176]. Therefore, by solving the following equation we can calculate the impact of additional weight on MPG:

$$\frac{0.33\% * original\ MPG}{Vehicle\ tonnage * 1\%} = \frac{\%\ reduction * original\ MPG}{additional\ weight\ carried}$$

The change in MPG can then be multiplied by the additional weight carried over the relevant distance to estimate the additional fuel used.

In contrast, LA bulky WEEE collections, introduced in option 3 are assumed to lead to additional journeys. It must be acknowledged that the policies are likely to cause a reduction in private journeys to specifically dispose of WEEE, particularly bulk WEEE, at HWRCs, return it to retailers or fly tip. However, we do not have sufficient data to quantify the reductions in private journeys, and therefore the associated carbon. Therefore, the additional carbon that is calculated is likely to be an overestimate, as it does not account for LA collection journeys replacing private journeys.

To calculate the additional carbon from fuel in option 3, the additional distance covered by collection vehicles under LA bulky WEEE collections is estimated and multiplied by kgCO2e per mile converters for the relevant vehicle class, to estimate the total CO2e, and then divided by the inverse of a kgCO2e per litre of fuel converter (2.59 kgCO2e/litre[177] based on an average diesel with biofuel blend), to estimate the amount of fuel used. This same kg/CO2e is used for options 2 and 4, to convert the estimated additional fuel used into an estimate of the additional CO2e emitted. For all options, the quantity of CO2e is converted to tonnes and multiplied by the BEIS carbon price per tonne shown in table 14.

The modelled litres of diesel associated with the policies are multiplied by the assumed price per litre of £1.28[178] (2019). This price is kept constant across the appraisal period to align with other cost assumptions used throughout the analysis, however we acknowledge that this is a simplification of the price of fuel. This simplification is particularly prevalent with the current fuel crisis, as well as the move towards electric vehicles[179], and the associated changes in fuel prices.

6.4.2 Fly-tipping disamenity

Fly-tipping creates social disamenity for those who live locally to the area, or pass by, as well as environmental negative externalities for local environments. Utilising Eftec's disamenity modelling[180], we have derived conditional values of the decrease in disamenity generated from reduced fly-tipping incidents. It is important to highlight that the disamenity values were created based on English data, since there was no available data for the other nations. Given the coverage of England, we have assumed that these values can be used across the UK. However, this could be an overestimate due to lower population densities in those nations.

The value per incident varies according to the number of people who experience the disamenity, and for how long they experience it (i.e., the duration assumption). Hence, the social cost of disamenity represents the expected time lag for fly-tipped waste to be collected and removed by

[176] Ricardo. Impact of Vehicle Weight Reduction on Fuel Economy for Various Vehicle Architectures. 2008. https://www.h3xed.com/blogmedia/Ricardo_FE_MPG_Study.pdf
[177] https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2019
[178] Eunomia: Ditching Diesel central assumption for residual RCV round mileage
[179] This impact assessment acknowledges that there is a move towards electrifying vehicles, including those involved in the waste industry. Due to a lack of understanding of the pace at which this will occur in refuse vehicles we have used a simplifying assumption that all vehicles are diesel based. This is likely to provide an overestimation of the carbon impacts of these journeys and further clarification of the impact of electric RCVs and vans will be sought for further stages of analysis.
[180] Eftec, Value of Reduced Disamentity from Fly-tipping – Waste Electricals, 2022

the Local Authority. Eftec estimated these values based on the assumption of 1,000 households being impacted by a single incident. Several clean up timeframes were modelled, with a central estimate of 3 days from the incident occurring, to being cleaned up, used.

Table 17: Disamenity value of fly-tipping involving waste electricals (2019£s/incident)

	1 day until collection	3 days until collection	5 days until collection
Central Value	£ 236	£ 707	£ 1,178

Notes: values rounded to nearest £1.

Table 17 presents Eftec's disamenity values per incident[181], albeit adjusted from 2022 prices to 2019 prices for the purpose of the impact assessment. This value per incident is then used to form a value per tonne, which can be used for our final analysis in this impact assessment.

The value per tonne is estimated based on the reported average of 0.12 tonnes per incident[182]. This aligns with assumptions set out in the baseline, that each incident of fly-tipping involving WEEE averages 2 items of WEEE at a weight of 60kg per item. These estimates are then presented in table 18. 3 days is used as for our central estimate.

Table 18: Disamenity value of fly-tipping involving waste electricals (£/tonne)[183]

	1 day until collection	3 days until collection	5 days until collection
Central Value	£1,965	£5,890	£9,815

Notes: values rounded to nearest £1. Based on average of 0.12 tonnes per incident.

It is important to also note that for consistency, it is assumed the value of disamenity will remain constant every year at the 2019 level.

Section 7: Costs and Benefits of Each Option

7.1 Option 2

7.1.1 Residual WEEE diverted to recycling/reuse in option 2

Policy option 2 proposes the introduction of a UK-wide household collection system for small mixed WEEE, which is financed by producers and is free to households. For the purposes of our cost and benefit analysis, we have assumed that this service is provided by local authorities. Currently, 86 LAs offer a SMW collection, and data on these LAs is used to estimate the current costs to these LAs[184]. Policy option 2 asserts that producers will pay all costs of household SMW collection, including the costs where LAs already have a SMW collection service in place. Ongoing costs relating to these 86 LAs will transfer from LAs to producers, which will not impact the NPV but will impact the EANDCB.

The costs of setting up household SMW collection are taken from modelling by Oakdene Hollins on providing a kerbside service[185]. The foundation of the model is based upon data provided by WRAP to Oakdene Hollins[186], on the number of households per Local Authority, and on the current dry mixed recycling (DMR) and residual collection schemes. WRAP categorises each LA in a 3 by 3 matrix, sorting them into 9 groups, based on their rurality and deprivation, which accounts

[181] Eftec, Value of Reduced Disamentity from Fly-tipping – Waste Electricals, 2022

[182] Eftec, Value of Reduced Disamentity from Fly-tipping – Waste Electricals, 2022

[183] Eftec, Value of Reduced Disamentity from Fly-tipping – Waste Electricals, 2022, p.5

[184] This groups of LAs includes a variety of ruralities and regions. It is therefore assumed that costs faced by these LAs reasonably represents LAs not currely offering this service. This will be tested further at consultation.

[185] https://www.oakdenehollins.com/reports/2021/8/2/update-to-a-review-economic-and-environmental-of-kerbside-collections-for-waste-electricals

[186] https://www.oakdenehollins.com/reports/2021/8/2/update-to-a-review-economic-and-environmental-of-kerbside-collections-for-waste-electricals assumed by Oakdene Hollins in their modelling

for differing costs faced by LAs. In this analysis, most costs are first estimated on a per unit basis, accounting for rurality and specific LA DMR and residual collection services, and then scaled up by the number of households that match these two categories.

In order to provide kerbside SMW collection, we assume that LAs will be able to retrofit refuse collection vehicles (RCVs) with a cage to collect SMW[187].

To calculate the anticipated tonnages flows of WEEE diverted to recycling and reuse once SMW household collection is rolled out in all local authority areas, current levels of SMW collection for LAs with SMW collection are scaled up. Currently, as a baseline, data from WasteDataFlow[188] suggests that in 2019, 2,277t of SMW was collected at kerbside. Oakdene Hollins[189] carried out surveys of LAs that currently offer a SMW collection service to understand the current annual household levels of SMW collected. Table 19 reflects the results of this survey which presents the median and upper quartile estimates of annual level of kilograms of SMW collected from each household (kg/hh per year).

Table 19: Annual SMW collection in LAs that currently offer kerbside SMW collection (kg per household per year)

Oakdene Hollins current median (kg/hh/year)	0.36
Oakdene Hollins current upper quartile (kg/hh/year)	0.96

It is assumed that the median household collection figures from Oakdene Hollins are representative of the current picture, and as option 2 is implemented, SMW household collection levels will reach the upper quartile of current collections over a 3-year transition period. From the first three years after implementation in 2025, we assume a 10% increase each year in the levels of SMW collected. Then from 2028, we assume that the rate of increase in SMW collections begins to decrease as the policy settles in and consumers have become accustomed to it, so we expect after the third year of implementation, a 7.5% increase, then 4%, then 2.5% and so on[190].

Using 2019 tonnage levels (not including any growth of WEEE), we calculated anticipated tonnage uptake of kerbside SMW collections and takeback in comparison to the baseline, presented below in table 20. It should be noted that we expect this to be a conservative estimate, as there are limitations with current collection services including the lack of coordinated nationwide communications campaigns which are proposed to be included as part of these reforms. As a lack of awareness of recycling routes (alongside lack of convenient options) have been found to be a key barrier to increased WEEE recycling, we expect the combination of communications campaigns and household collections to see a higher uptake than current household collection schemes.

Table 20: Anticipated SMW collection uptake from 2019 (tonnes)

	Baseline	Year 1	Year 5	Year 10	Total (Over ten years)
Anticipated uptake based on current observations	2,277.50	9,930	44,448	57,429	418,675
Additional takeback compared to baseline (2019 tonnages)	0	7,653	42,170	55,152	395,899

[187] https://www.oakdenehollins.com/reports/2021/8/2/update-to-a-review-economic-and-environmental-of-kerbside-collections-for-waste-electricals assumed by Oakdene Hollins in their modelling
[188] Waste data flow questions 10 and 11, Anthesis Evidence Gaps 2022, pg. 39
[189] https://www.oakdenehollins.com/reports/2021/8/2/update-to-a-review-economic-and-environmental-of-kerbside-collections-for-waste-electricals
[190] These assumptions account for the fact that it will take time for households to get used to these systems and that as they become more knowledgeable about the system more will be collected but the potential additional amount that can be collected will reduce over time. This will be tested further at consultation.

Anthesis[191] were commissioned by Defra to model this scenario and estimate the level of WEEE diversion due to implementing a SMW household collection service across all LA areas. Anthesis were provided with the data in table 20 on anticipated WEEE collections from 2019 data, and modelled it over the appraisal period, with the annual growth rate assumption that the total tonnage of WEEE increases by 3% per year, an assumption used throughout the impact assessment. In line with the rest of the modelling, the split of the residual WEEE is assumed to be 70% to EfW and 30% to landfill.

Table 21 presents the difference in tonnage flows for option 2, compared to the baseline.

Table 21: Tonnage of SMW to each waste flows over appraisal period under option 2

Category	Waste Flow	2025	2029	2034	Total (over 10 years)
SDA	Reuse				
	Recycling	11,395	57,408	83,892	565,707
	Recovery (EfW)	-7,977	-40,186	-58,724	-395,996
	Landfill	-3,419	-17,222	-25,167	-169,620

Fly-tipping assumptions

It is assumed that households that choose to fly-tip do so because of the costs and/or lack of convenience of WEEE disposal/collection. Small items of WEEE envisaged to be collected through the SMW kerbside collection system include phones, laptops, electric toothbrushes, small speakers, etc. Essentially, items that can be stored in a shopping bag. These are items that can be, and are currently, appearing in the 155kt of WEEE identified every year in residual waste. Other larger SMW items, such as microwaves, hoovers, large toasters, etc, can't be thrown in residual waste and also can't be collected through the SMW kerbside collection system (see option 2 specific assumptions on container sizes for SMW kerbside collection system). Throwing smaller SMW in residual is seen as a more convenient disposal methods than fly-tipping. Therefore, we are assuming that no fly-tipping will be diverted as a result of implementing the SMW kerbside collection system.

7.1.2 Option 2 transition costs

Set up costs – containers

The total container costs are based upon modelling by Oakdene Hollins. The costs depend upon the cost of the container, the cost of delivery, and the number of households living in flats in each LA. It is assumed that the same container is used, regardless of the collection type, and that only flats will need a new container. The cost of a 55-litre container without delivery is assumed to be £1.93 per box, with an additional 2% added for the cost of financing. The delivery costs vary depending on rurality and are in the range of £0.70 to £1.50 per household[192].

These unit costs are then scaled up by the number of flats in different categories of LAs. It must be acknowledged that this provides an upper estimate of the container costs, Oakdene Hollins recognise using the number of flats provides a "worst case scenario" of the costs, where it is assumed that all households in flats would require a container. However, this does not capture the considerable variability in types of flats and how they are set-up to dispose of waste. For example, flats in tower blocks with communal DMR may require one, slightly larger container. However, due to limited evidence on the number of flats within each waste disposal arrangement, we have made a simplification that is likely to be an overestimate of the actual costs. Refining this estimate is something that we aim to model in the final impact assessment.

[191] Anthesis, Evidence Gaps, 2022

[192] https://www.oakdenehollins.com/reports/2021/8/2/update-to-a-review-economic-and-environmental-of-kerbside-collections-for-waste-electricals

Oakdene Hollins's modelling includes data on the average proportion of households living in a flat in England and Northern Ireland but does not include data for Scotland or Wales. Therefore, we have gathered further data on the proportion of households living in flats in each of Scotland's LAs, but we have no additional data for Wales, so it is assumed to have the same proportion of households living in a flat as England. This data is presented below in table 22. For the final impact assessment, we would like to gather data for the proportion of households living in a flat in Welsh LAs.

Table 22: Average proportion of households living in a flat in an LA

England	Scotland	Wales	Northern Ireland
13%[193]	26%	13%[194]	8%

Source: Oakdene Hollins modelling adjusted by data provided by Zero Waste Scotland (ZWS)[195]

The total set up costs for providing the containers is presented below in table 23, showing the costs of inclusion and exclusion of LAs with existing SMW collection operations. In our cost-benefit analysis we use the total set-up costs including those with existing operations.

Table 23: Costs for the containers provided for flats (£ millions)

Total set up costs (including those with existing operations)	£13.7m
Total set up costs (excluding those with existing operations)	£11.8m

Staff training and familiarisation

As this would be a new policy for most local authorities and their waste management organisations, the staff who work in the related areas will need to undergo training to learn and familiarise themselves with how the new SMW kerbside collection system works should producers choose to engage them as delivery partners. If producers chose to work with other service providers, they also would equally incur training and familiarisation costs.

Oakdene Hollins's report was conducted with input from stakeholders and suggests that this additional training would be included in typical regular training, and that "the training costs were still negligible" - even if training was added part way through a contract[196]. However, to capture training and familiarisation costs, we have assumed additional training and familiarisation costs to be 0.8% of variable costs across the first two years, assuming that beyond these first two years, the costs would become part of general training and familiarisation costs for staff[197] and so a negligible amount of these costs would be attributable to the policy[198].

Table 24: Staff training and familiarisation over appraisal period (£)

	2025	2026	Total (10 years)
Staff training and familiarisation	£50,967	£50,967	£101,933

Scheme Administrator set up costs

As described in the section 6.1.1, an estimate of £392,941 Scheme Administrator set up costs has been calculated by scaling down costs estimated for the pEPR IA based on the number of producers expected to be obligated under each scheme.

[193] Note, the proportion of flats was not provided for 5 English Local Authorities.
[194] No data provided, so assumed to be the same as England
[195] https://webarchive.nrscotland.gov.uk/20200317165216/https:/www2.gov.scot/Topics/Statistics/16002/LAtables2018/2018Excel
[196] https://www.oakdenehollins.com/reports/2021/8/2/update-to-a-review-economic-and-environmental-of-kerbside-collections-for-waste-electricals, p.46
[197] This accounts for non wage labour costs
[198] As used in the Deposit Return Scheme impact assessment: https://consult.defra.gov.uk/environment/consultation-on-introducing-a-drs/supporting_documents/Impact%20Assessment.pdf

Table 25: Scheme Administrator set up costs (£ millions)

Scheme Administrator Set Up Costs	£0.4m

Communication costs

As described in the cross-cutting assumption section 6.2.3, it is assumed that in the first year of the policy there will be transition costs due to communication campaigns to introduce the policy to households, this cost is, on average, £1.49 per household. These costs will fall on the Scheme Administrator and will be passed onto producers.

Table 26: Initial Communication Costs (£ millions)

Communication Costs	£39.9m

7.1.3 Option 2 annual costs

Enforcement costs

As discussed in section 6.1.2, we expect that regulators will face no additional costs under the reformed system. This assumption was discussed with the Environmental Agency who confirmed that it was a reasonable assumption to make.

Table 27: Additional enforcement costs to regulators (£ millions)

Additional Enforcement Costs to Regulators	£0

Scheme Administrator operational costs

As set out in section 6.1.1, we estimate the annual Scheme Administrator operational (including office, admin, and staff) costs to be £4,488,831, totalling £44,888,313 over the 10-year appraisal period. This is based on scaling down Scheme Administrator costs estimated for the pEPR impact assessment, based on the number of producers obligated under each scheme.

Table 28: Scheme Administrator operational costs (£2019 millions)

	Annual	Total (10 years)
SA operational costs	£4.5m	£44.9m

Crew costs

There will be additional costs for labour associated with the extra workload that SMW collections will create for dry mixed recycling crews if such an approach was adopted to fulfil the producer obligation for household collections of SMW. Under this scenario, as SMW is expected to be collected at the same time as DMR, this will minimise costs. However, there will be increased labour costs for collection of SMW due to the additional time it will take crews to collect SMW. In order to calculate the additional crew costs of collecting SMW, the additional time per loader spent on collecting WEEE is multiplied by the salary costs of crew.

It is reasonable to assume that the RCV driver's role is fulfilled whether SMW is collected or not, and they have not been attributed to SMW. Therefore, we only consider the additional costs of the crew involved in loading the RCV. The number of other crew members depends on the rurality of the LA location. As in Oakdene and Holland's analysis, we assume that there is 1 loader per vehicle in rural areas, and 2 per vehicle in urban and suburban areas[199]. There is 1 supervisor employed for every 10 crew members. The average salary per loader is £25,341, and for supervisor's, is £42,400, which is based upon ICP2 data from WRAP[200]. For consistency, number

[199] https://www.oakdenehollins.com/reports/2021/8/2/update-to-a-review-economic-and-environmental-of-kerbside-collections-for-waste-electricals, p.29

200 This is WRAP's developed national indicative cost and performance assessments on known average baselines for different areas, which has been utilised by Oakdene Hollins. ICP2 - http://laportal.wrap.org.uk/Documents/ICP%20online%20tool%20assumptions.pdf,

of crew based on location, the crew to supervisor ratio and the salary costs are kept constant across the appraisal period.

To estimate the proportion of time spent per loader on collecting WEEE, the volume of a SMW cage as a proportion of the total refuse collection vehicle's capacity is used as a proxy. From contact with expert stakeholders, and findings from a mid-Sussex report[201], it is assumed that the volume of an average SMW cage is 0.18m^3, and the volume of an average DMR vehicle is 22m^3. Taking the volume of the SMW cage as a proportion of the volume of the vehicle, leads to an estimate of 0.81% of a loaders time being spent collecting SMW. Similarly, it is also assumed that 0.81% of supervisor time is allocated to SMW.

To calculate the specific labour costs from household SMW collection, the annual loader salary costs from DMR collections is multiplied by 0.0081 (the additional time taken to collect SMW) and the annual crew costs are presented below in table 29:

Table 29: Crew (labour) costs of SMW kerbside collection (£ millions)

	Annual	Total (10 years)
Crew costs	£3.8m	£38.0m

Vehicle retrofitting costs

The vehicles used for recycling and refuse collections are Refuse Collection Vehicles (RCVs) and kerbside-sort vehicles. We assume that kerbside-sort vehicles would be able to allocate a section of their vehicle to SMW, especially given that it can be assumed that SMW is not collected from every household and only takes up a small space, and once a Deposit Return Schemes for drinks containers is implemented, more space should be freed up in kerbside-sort vehicles. However, for RCVs, there is not spare capacity for SMW, and so it is assumed that RCVs will be retrofitted to add a SMW cage to the vehicle which is assumed to operate at an 80% fill level.

To calculate the vehicle retrofitting costs, the number of RCVs is multiplied by the average cost of a cage and the fitting costs. The cost of a SMW cage is taken from an average of the costs provided by two sources, a report from the Mid Sussex District Council[202], which proposes the cost of a cage as £657, and £500, suggested by a waste contractor[203]. We assume that the fitting costs per cage are £180, which was extracted from the Mid Sussex District Council report[204]. We assume that both the cost of the cage and of fitting it will not be impacted by either rurality or deprivation. The above assumptions will be tested during the consultation process.

Assuming that all RCVs that collect DMR are fitted with a cage, the number of RCVs needing SMW cages is estimated by dividing the number of households in each LA by the number of households that a vehicle can serve per collection journey, which is specific to the LAs rurality, and then further divide this by the number of working days within the collection frequency in the LA. For example, if DMR is collected weekly, it is divided by 5; if it is collected fortnightly, then it is divided by 10. Having estimated the number of RCVs requiring retrofitting of a SMW cage, this is multiplied by the average cage and fitting costs and this cost is annualised over 7 years, as in Oakdene Hollins report.

The cost of retrofitting RCVs with a SMW cage is presented below in table 30:

Table 30: Annual vehicle retrofitting costs (£2019 millions)

	Annual	Total (10 years)

201 Mid Sussex District Council Report: Proposal for an Enhanced Recycling Collection Service for Textiles and Small Waste Electrical and El.pdf (moderngov.co.uk)
202 Mid Sussex District Council Report: Proposal for an Enhanced Recycling Collection Service for Textiles and Small Waste Electrical and El.pdf (moderngov.co.uk)
203 This figure was collected during stakeholder engagement and is the waste contractor wants to remain confidential
204 Mid Sussex District Council Report: Proposal for an Enhanced Recycling Collection Service for Textiles and Small Waste Electrical and El.pdf (moderngov.co.uk)

Vehicle retrofitting costs	£1.8m	£18.0m

It is acknowledged that there might be limitations in the practicalities of installing SMW cages to RCV vehicles since RCVs do not have uniform proportions, as shown below in figure 2. This practicality issue may be exacerbated further as there is a movement towards electric RCVs. However, these practicality issues should not significantly impact the cost of retrofitting vehicles, and this impact could be analysed in the final impact assessment, collecting further views from waste management companies such as Biffa.

Figure 2: Examples of kerbside collection compartments on RCVs[205]

Flat container replacement costs

Anthesis assume that 5% of containers provided to flats will need to be replaced on average per year (for example due to breakages or loss). This is assumed to cost the same per container as previously outlined in this section.

Table 31: Annual container replacement costs (£ millions)

	Annual	Total (10 year)
Container replacement costs	£0.7m	£6.8m

Local and commercial overheads

Consideration of overheads was taken from the report by Oakdene Hollins[206]. This is considered an annual operating cost for local and commercial overheads, assumed to be a flat rate of 10% of the collection costs. This 10% rate is in line with the ICP3 methodology and assumed to remain constant over the appraisal period.

The Oakdene Hollins report also addressed that no specialist equipment would be anticipated, so we have not diverged from the 10% rate suggested.

Table 32: Annual local and commercial overheads (£ millions)

	Annual	Total (10 years)
Local and commercial overheads (per year)	£0.6m	£6.4m

Ongoing Communication costs

As described in the cross-cutting assumption section 6.2.3, it is assumed that ongoing communication campaigns will cost £0.5 per household. As explained, campaigns are assumed

205 Oakdene Hollin's Report, page 24, Left: Example of undercarriage cage installed under RCV in Mid Sussex where WEEE are presented in carrier bags; Right: Example in Urbaser where the compartments are used for clothing, SMW and batteries

206 https://www.oakdenehollins.com/reports/2021/8/2/update-to-a-review-economic-and-environmental-of-kerbside-collections-for-waste-electricals, p.29

to have a significant transition cost then a fixed yearly operational cost. These costs will fall on the Scheme Administrator and will be passed onto producers.

Table 33: On-going Communications campaigns costs (£ millions)

	2025	2029	2034	Total (10 years)
Communications costs	0m	14.5m	14.5m	130.8m

Treatment costs

The assumed cost per tonne of treating WEEE was discussed in the cross-cutting assumptions section 6.2.1. Multiplying the relevant cost per tonne by the estimated WEEE diverted to recycling from residual waste provides an estimate of £43m over the appraisal period.

Table 34: The cost of treating WEEE (£ millions)

	2025	2029	2034	Total (10 years)
Treatment costs	£0.9m	£4.4m	£6.4m	£43.4m

Cost of additional fuel attributed to SMW collections

As previously stated, it is assumed that SMW collections will be collected alongside current DMR collections. Therefore, it is assumed that the distance travelled by collection vehicles under option 2 will remain the same as in the baseline, but that the weight of waste carried by each vehicle will increase because of the additional SMW collected.

The additional fuel use was modelled by Anthesis as part of their research into the cost of introducing kerbside SMW collections. They assume that the average DMR vehicle travels 13,780k miles per vehicle year for collections in urban areas and 19,500k miles per vehicle per year for collections in rural areas[207]. This is multiplied by the estimated number of vehicles needed for each LA[208] (based on the rurality of the LA), to calculate a total number of miles covered per year.

The reduction in Miles per Gallon (MPG) attainted by vehicles as a result of the increased weight from SMW collections (estimated using the equation set out in the cross-cutting assumptions section 6.4.1), is then multiplied by the number of miles travelled per year, to estimate the fuel usage. This is then converted to litres and multiplied by the assumed 2019 fuel cost per litre (£1.28)[209].

Overall, this leads to an increase in fuel costs of £0.9 million over the appraisal period.

Table 35: Cost of additional fuel attributed to SMW collections (£)

	2025	2029	2034	Total (10 years)
Cost of additional fuel attributed to SMW collections	£85,760	£85,760	£85,760	£857,604

Additional carbon from transport

The same total additional fuel use is then multiplied by the assumed 2.59 kgCO2e/litre for an average diesel biofuel mix[210] and converted into tonnes of CO2e. This is then multiplied by the BEIS carbon prices[211].

[207] https://www.eunomia.co.uk/reports-tools/the-climate-change-impacts-of-recycling-services-in-wales/
[208] Method set out under vehicle retrofitting costs
[209] Eunomia: Ditching Diesel central assumption for residual RCV round mileage
[210] https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2019
[211] Valuation of greenhouse gas emissions: for policy appraisal and evaluation 2021, Annex 1, https://www.gov.uk/government/publications/valuing-greenhouse-gas-emissions-in-policy-appraisal/valuation-of-greenhouse-gas-emissions-for-policy-appraisal-and-evaluation#annex-1-carbon-values-in-2020-includes-per-tonne-of-co2

This leads to an estimate of £460k of additional carbon over the appraisal period.

Table 36: Cost of additional carbon from additional fuel used in SMW collections (£)

	2025	2029	2034	Total (10 years)
Additional carbon from transport	£42,907	£45,547	£49,178	£459,599

Landfill tax loss to the public sector

Diverting WEEE away from residual disposal routes will lead to less WEEE ending up in landfill. This will lead to a loss of landfill tax to the public sector. As described in section 5.5, we assume that 30% of WEEE sent to residual will be disposed of in landfill. Multiplying the expected tonnage of WEEE diverted away from residual by 30%, and then by the landfill tax rate of £91.35 per tonne, leads to an estimate of £16m over the appraisal period.

Table 37: Landfill tax loss to the public sector (£ millions)

	2025	2029	2034	Total (10 years)
Landfill tax loss to the public sector	£0.3m	£1.6m	£2.3m	£15.5m

7.1.4 Annual Benefits

Net carbon reduction resulting from tonnage diverted from residual to recycling/reuse

By applying territorial carbon factors and BEIS carbon prices (as set out in the cross-cutting assumptions section 6.4.1) to the estimated tonnage diverted from residual disposal to recycling and reuse under option 2, we estimate total societal GHG benefits of £189m over the 10-year appraisal period.

Table 38: Net Carbon reduction from WEEE diversion to recycling/reuse (£ millions)

	2025	2029	2034	Total (10 years)
Net carbon reduction resulting from tonnage diverted from residual to recycling/reuse	£3.5m	£18.7m	£29.5m	£188.9m

Secondary market profits to reprocessors from additional recycled materials

As described in the cross-cutting assumptions section 6.2.1, additional revenue to reprocessors is estimated by multiplying secondary material prices by the estimated additional WEEE tonnage diverted to recycling from residual. To account for the cost faced by reprocessors during the recycling process, only the assumed profit proportion of this revenue is included as a benefit. This leads to an estimated £102m in increased profit to reprocessors over the appraisal period.

Table 39: Secondary market profits to reprocessors (£ millions)

	2025	2029	2034	Total (10 years)
Secondary market profits to reprocessors from additional recycled materials	£2.1m	£10.4m	£15.1m	£102.1m

Landfill tax saving (LA/waste collector)

Diverting WEEE away from residual disposal routes will lead to less WEEE ending up in landfill. This will lead to a saving to LAs who currently pay landfill tax to dispose of WEEE collected as residual waste from households. As described in the section 5.5, we assume that 30% of WEEE sent to residual will be disposed of in landfill. Multiplying the expected tonnage of WEEE diverted away from residual by 30%, and then by the landfill tax rate of £91.35 per tonne, leads to an estimate of £16m over the appraisal.

This is a transfer from the public sector to LAs.

Table 40: Landfill tax savings for LAs/ Waste Collector (£ millions)

	2025	2029	2034	Total (10 years)
Landfill tax savings	£0.3m	£1.6m	£2.3m	£15.5m

Landfill and EfW Gate Fee Savings

As well as landfill tax savings, there will also be other disposal cost savings to LAs: landfill and EfW gate fees. To estimate these savings, the proportion of the estimated tonnage diverted from residual is split between landfill and EfW (30% to landfill and 70% to EfW) and then multiplied by the respective gate fee per tonne rate.

Overall, LAs will save £41m over the appraisal period.

Table 41: Landfill and EfW gate fee savings to LAs (£ millions)

	2025	2029	2034	Total (10 years)
Gate fee savings	£0.8m	£4.2m	£6.1m	£41.1m

7.2 Option 3

This section outlines the ***additional*** costs and benefits attributable to option 3.

7.2.1 Residual WEEE diverted to recycling/reuse in option 3

Policy option 3 proposes the introduction of a free household bulky WEEE collection service, funded by producers. For the purposes of this IA, we have assumed that this collection will be undertaken by local authorities; with local authorities then charging producers for this service. This assumption has been applied because of the availability of data concerning bulky waste collection services currently operated by local authorities. Using this data has allowed us to model a system where LAs operate a free bulky WEEE collection service for households that is funded by producers.

Anthesis were commissioned by DEFRA to model this scenario, and form estimates of the amount of WEEE collected due to implementing a free household bulky WEEE collection service. This research sought to understand how households might change their disposal behaviour if the price structure of bulky waste collections changes. For example, if the service were to change from charged to free.

Anthesis reviewed documents from 12 local authorities that have implemented bulky waste collections (11 of which changed from a free collection, to a charged for collection). Evidence gathered from the 12 LAs indicates that charging for bulky WEEE collections can lead to up to an 85% reduction in the number of collections, with an average reduction in collections of roughly 65%[212]. Therefore, it is not unreasonable to suggest that if the reverse is implemented, the reduction in bulky WEEE collections witnessed after changing from a free to a paid for collection, would be reversed. We therefore assume the increase in tonnage collected through this route as a response to the policy option to be equivalent to the reversal of this trend, albeit with 5% of the additional tonnage removed. This 5% has been applied due to the increasing number of options to households to dispose of their WEEE (e.g., take-back routes, HWRC drop off, etc.) as a result of the reforms outlined, and therefore, we have assumed that reversing the price increase of collections would not result in a complete return to previous collection levels[213].

[212] Anthesis, Evidence Gaps, 2022
[213] Anthesis, Evidence Gaps, 2022

We apply this increase to data on the amount of WEEE collected through current bulky WEEE collection services to estimate the new collected tonnage post policy implementation[214]. The additional tonnage is assumed to be diverted away from other collection routes. This is because for bulky WEEE, there is assumed to be no hoarding in the system[215]. Therefore, we assume that the additional WEEE collected has been diverted away from HWRC deposits and the informal sector.

Due to the inconvenience of taking WEEE to HWRCs, and the assumption that informal and illegal disposals cost less than formal collections, it is assumed that the informal sector will provide the bulk of the uplift in performance. We therefore assume that 85% of the increased tonnage collected is diverted from the informal sector. This includes both a reduction in fly-tipping, and a reduction in WEEE being collected by local scrap dealers. The remaining 15% is assumed to be diverted away from HWRC deposits, which consists of households transporting their own WEEE to collections points.

Moving to implementation of a free bulky WEEE collection service is expected to increase reuse as well as recycling. This is because moving to a formal bulky WEEE collection service, funded by producers (assumed, for the purpose of this IA, to be operated by LAs), should enable a greater separation and quality in condition of the WEEE that is collected. As it is being left up to producers how to implement the reforms, they may choose to work with the third sector, e.g., the Reuse Network. Therefore, this should increase the chance of reuse/refurbishment opportunities, while also improving recycling rates.

Table 42: Change in bulky WEEE recycling and reuse rate from baseline to policy options[216]

	Assumed in baseline	**Assumed in option 3**
Recycled	**20%**	**60%**
Reused	**0%**	**10%**
Disposal (Landfill and EfW)	**80%**	**30%**

Source: Anthesis Evidence gaps research[217]

Overall, as depicted in table 42, the modelling assumes that the recycling rate for WEEE in bulky waste will rise from 20% to 60%, with reuse increasing from 0% to 10%[218]. The remainder of WEEE collected through the free bulky WEEE collections is assumed to be sent to disposal at EfW or landfill sites. In line with the rest of the modelling, the split of the residual WEEE is assumed to be 70% to EfW, and 30% to landfill[219].

Table 43 depicts the difference in tonnage flows for option 3, compared to the baseline. It is important to note that the total amount of WEEE collected through all routes is assumed not to change because of the policy implementation, as it is assumed that there is no hoarding of bulky WEEE. Any change therefore reflects a diversion from disposal to recycling and reuse. As throughout the modelling, it is assumed that the total tonnage of WEEE increased by 3% per year.

Table 43: Waste diversion impacts from introduction of free household bulky WEEE collections (tonnes)

Category	Waste Flow	2025	2029	2034	Total (over 10 years)
LHA	Reuse	4018	13705	15888	127173

[214] Anthesis, Evidence Gaps, 2022
[215] Conversations with consultants confirmed that it would be realistic to assume that on a household basis there would be a negligible amount of hoarding of bulky WEEE due to a lack of space. Households would either be using multiple items of bulky WEEE or disposing of bulky WEEE to replace it with a new item rather than hoarding the waste.
[216] This is the marginal impact of option 4
[217] Anthesis, Evidence Gaps, 2022 – The other recycling factor is explained in the baseline assumptions section.
[218] Anthesis Evidence Gaps, 2022
[219] Anthesis, Evidence Gaps 2022

	Recycling	9082	30974	35907	287411
	Recovery (EfW)	-9170	-31276	-36257	-290208
	Landfill	-3930	-13404	-15539	-124375
SDA	Reuse	46	158	183	1466
	Recycling	185	632	733	5865
	Recovery (EfW)	-162	-553	-641	-5132
	Landfill	-69	-237	-275	-2199
Display	Reuse	66	224	260	2079
	Recycling	148	506	587	4699
	Recovery (EfW)	-150	-511	-593	-4745
	Landfill	-64	-219	-254	-2033
Cooling	Reuse	1928	6577	7624	61025
	Recycling	4358	14863	17231	137917
	Recovery (EfW)	-4400	-15008	-17398	-139260
	Landfill	-1886	-6432	-7456	-59683

7.3.2 Reduction in Fly Tipped WEEE in Option 3

As mentioned, it is assumed households that choose to fly-tip or use illegitimate waste collection companies that fly-tip, do so because of the costs and/or lack of convenience of WEEE disposal/collection. By addressing these factors, the proposed policies are likely to have some effect in decreasing the amount of WEEE being fly tipped.

As described in more detail in the cross-cutting assumptions section 6.3.1, Anthesis suggest that a free bulky waste WEEE collection service for households could decrease fly tipped WEEE by around 10%-15%. As a conservative estimate we used 10% in the impact assessment modelling.

Table 44: Reduction in fly-tipping under option 3 (tonnes, assumed 10% reduction)

Category	**2025**	**2029**	**2034**	**10-year policy period total**
Lower Bound	585	658	763	6,701
Mid-point	**1,101**	**1,239**	**1,436**	**12,617**
Upper Bound	1,617	1,820	2,109	18,533

Source: DEFRA modelling

Table 44 depicts the total tonnage diversion that would be realised if option 3 was implemented. As mentioned in the section on baseline fly-tipping tonnages, it is assumed that fly-tipping tonnages increase by 3% p.a., which is in-line with the assumed increase in electrical waste every year.

7.2.3 Annual costs

Enforcement Costs

As discussed in the cross-cutting assumptions section 6.1.2, we expect that regulators will face no additional costs under the reformed system.

Table 45: Additional Enforcement Costs to Regulators

Additional Enforcement Costs to Regulators	£0

Scheme Administrator Costs

We do not currently have sufficient evidence to determine the additional Scheme Administrator costs needed for each individual policy option. As such, we assume the same Scheme Administrator costs in each option. There are therefore no additional Scheme Administrator costs in option 3. Scheme Administrator costs will be reviewed, following consultation, for the final impact assessment.

Table 46: Option 3 Scheme Administrator Costs

Additional Scheme Administrator Operational Costs	£0

Bulky WEEE Collection Costs to Producers

Anthesis have estimated a cost of £8.87 per item for bulky WEEE collections, which is based on the prices charged by LAs currently for this service[220]. We assume that this covers the full cost of the collection service (including vehicle costs, staff etc)[221]. Under the assumption that the average bulky WEEE item weights 60kg[222], this translates to £147.83 per tonne. Multiplying this by the current tonnage of bulky WEEE reported as collected by LAs[223][224], leads to an estimated baseline cost (2019) of £9,567,677.

Anthesis assume that under option 3, the tonnage of bulky WEEE collected through LA bulky WEEE services will increase by 250%[225]. Multiplying this additional tonnage by the estimated £147.83 per tonne provides an estimation of the additional costs under option 3.

It should be noted that baseline bulky WEEE collection costs are assumed to be faced by households who are generally charged by LAs for using this service. Under option 3, producers will face the full cost of this service, including that currently paid for by households. As such, the baseline costs are a transfer from households to producers.

Overall, it is estimated that producers will face costs of £327,417,191 over the appraisal period. This includes both the baseline costs which have been transferred to businesses, and the costs associated with collecting the increased tonnage modelled.

Table 47: Bulky WEEE collection costs (£ millions 2019)

	2025	**2029**	**2034**	**10-year policy period total**
Baseline costs (transferred)	£11.4m	£12.9m	£14.9m	£131.0m
Additional option 3 costs	£17.1m	£19.3m	£22.4m	£196.5m
Total costs	£28.6m	£32.1m	£37.3m	£327.4m

Communication cost to business

[220] Anthesis Evidence Gaps 2022
[221] We will test this assumption through the consultation process
[222] Anthesis, Evidence Gaps, 2022
[223] Waste Data Flow
[224] Assumed to increase by 3% over the appraisal period in line with the rest of the analysis.
[225] Anthesis, Evidence Gaps, 2022

As set out in the cross-cutting assumptions section 6.2.3, there will be no additional communication costs for Option 3, since the difference between small and bulky WEEE and their disposal methods would have to be communicated under both options. Thus, under Option 3, the messaging may be slightly different, but the costs should be the same.

Table 48: Communication campaign costs for option 3

	10-year policy period total
Communication campaigns costs	£0m

Treatment Costs to Business

To estimate the treatment (recycling) costs for the tonnage collected under option 3, the estimated tonnage of each type of WEEE collected is multiplied by the specific treatment cost for that WEEE category (as set out in the cross-cutting assumptions section). This leads to costs of £28m over the appraisal period.

Table 49: Costs to businesses of treating additional WEEE

	2025	**2029**	**2034**	**10-year policy period total**
Treatment Costs to Business	£0.9m	£3.1m	£3.5m	£28.3m

Carbon costs (from additional fuel)

Under option 3, it is assumed that ensuring that household bulky WEEE collections are free to households will lead to an increased demand for bulky WEEE collections. Therefore, LAs will have to make additional collection journeys. This will lead to additional fuel usage (and additional CO2e emissions)[226]. Oakdene Hollins' modelling[227] is used to estimate this.

Whilst there will be additional fuel usage from additional journeys made by LAs, there may be reductions in fuel use from households taking bulky WEEE to HWRCs in private vehicles and from journeys made to fly-tip. However, we do not have the data to quantify the potential reduction in carbon costs from a reduction in journeys in the counterfactual. Therefore, the carbon costs under Option 3 are likely to be an overestimate of the cost of greenhouse gas emissions from additional fuel.

Oakdene Hollins first estimate the total distance covered by these collections once option 3 is implemented. As the extent of journeys under this option is uncertain, the number of miles covered by kerbside residual vehicles operating biweekly collection services are used to estimate the milage of collection vehicles. This would roughly represent a bulky WEEE service driving down every road once every two weeks[228]. Oakdene Hollins assume that each residual collection vehicle travels 18,000 miles per year if in an urban area, or 24,000 miles for those in rural areas[229]. Based on 261 working days per year, and each household being visited every 10 working days (2 working weeks), this suggests 67 and 95 miles per vehicle, per round, respectively. Assuming that each urban round visits 2.5k households, and each rural round visits 1.5k households[230], this suggests 0.03 and 0.06 miles per household for urban and rural areas respectively. This is likely an overestimate however is used as a conservative estimate due to a lack of specific data on the miles covered by bulky waste services.

[226] Note there may be fuel and carbon savings as a result of households no longer taking WEEE to collections points however these are likely to be small and have not been quantified.
[227] Oakdene Hollins, A Review (Economic and Environmental) of Kerbside Collections for Waste Electricals, 2021
[228] The distance covered visiting each road is assumed to be roughly the same whether waste is collected from one household or all households.
[229] Oakdene Hollins, A Review (Economic and Environmental) of Kerbside Collections for Waste Electricals, 2021
[230] Oakdene Hollins, A Review (Economic and Environmental) of Kerbside Collections for Waste Electricals, 2021

Dividing the total number of households in each LA[231] by 10 provides the number of households visited per round, which is then multiplied by the miles per household (depending on rurality) and multiplied by the number of working days per year to estimate the total distance covered per LA. Summing all LAs leads to the total distance covered by bulky WEEE services once option 3 is operational.

It is assumed that a Class II van (1.305 to 1.74 tonnes) is used for this policy due to its payload capacity of 0.85t[232]. This aligns with our assumptions that each journey collects 0.72t of WEEE, with each item estimated to weigh 60kg, with 4 items per collection, and 3 collections per journey[233]. The kgCO2e per mile covered by a Class II vehicle are understood to be 0.23 kgCO2e/mile, this is multiplied by the miles covered, to provide a total kgCO2e impact of these journeys. However, some collections are already occurring under a paid-for system, therefore, only the relevant increase in journeys is associated with this policy. It is assumed here that there will be a 250% increase in collections in comparison to those seen in the current system, therefore 60% of the total fuel is associated with the introduction of a free-of-charge service.

Multiplying these estimated additional CO2e tonnages by the BEIS carbon prices[234], leads to an additional £12m of CO2e over the appraisal period.

Table 50: Carbon costs from additional fuel usage in bulky WEEE collections (£ millions)

	2025	2029	2034	Total (10 years)
Carbon costs (from additional fuel)	£1,1m	£1.2m	£1.3m	£12.2m

Landfill tax loss to the public sector

Diverting WEEE away from residual disposal routes will lead to less WEEE ending up in landfill. This will lead to a loss of landfill tax to the public sector. As described in section 5.5, we assume that 30% of WEEE sent to residual waste will be disposed of in landfill. Multiplying the expected tonnage of WEEE diverted away from residual by 30%, and then by the landfill tax rate of £91.35 per tonne, leads to an estimate of £17m tax loss to the public sector over the appraisal period.

Table 51: Landfill tax loss to the public sector (£ millions)

	2025	2029	2034	Total (10 years)
Landfill tax loss to the public sector	£0.5m	£1.9m	£2.1m	£17.2m

7.2.4 Option 3 annual benefits

Carbon savings

By applying carbon factors and BEIS carbon prices (as set out in the cross-cutting assumptions section 6.4.1) to the estimated tonnage of WEEE diverted from residual disposal to recycling and reuse under option 3, we estimate total additional territorial carbon emission benefits of £162.6m over the 10-year appraisal period. As mentioned in section 6.4.1, these are an underestimate of the carbon reduction under Option 3 as it does not take into account international emissions savings.

Table 52: Net carbon reduction from diversion of WEEE to reuse/ recycling in Option 3 (£ millions)

[231] WRAP https://preprod.wrap.org.uk/sites/default/files/2020-09/WRAP-UK%20bulky%20waste%20summary_0.pdf
[232] https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2021
[233] These assumptions have been taken under advice of industry research and understanding of consumer behaviours. This assumes that it is bulky items which are being collected and that most will call upon a collection service when they're getting rid of more than one item.
[234] Valuation of greenhouse gas emissions: for policy appraisal and evaluation 2021, Annex 1, https://www.gov.uk/government/publications/valuing-greenhouse-gas-emissions-in-policy-appraisal/valuation-of-greenhouse-gas-emissions-for-policy-appraisal-and-evaluation#annex-1-carbon-values-in-2020-prices-per-tonne-of-co2

	2025	2029	2034	Total (10 years)
Net carbon reduction resulting from tonnage diverted from residual to recycling/reuse	£4.7m	£17.2	£21.5m	£162.6m

Reduced fly-tipping disamenity

To estimate the fly-tipping disameity reduction as a result of option 3, the estimated reduction in fly tipped WEEE (12,617 tonnes over the appraisal period) is multiplied by the estimated disamenity value per tonne (£5,890). The calculations behind this disamenity value are set out in the cross-cutting analysis section. Overall, it is estimated that this will lead to £74m of societal benefit over the appraisal period.

Table 53: Benefits of reduction in fly-tipping disamenity (£)

	2025	2029	2034	Total (10 years)
Fly-tipping disamenity benefits	£6.5m	£7.3m	£8.5m	£74.3m

Savings to households no longer paying for bulky WEEE collection

On-demand bulky waste (including bulky WEEE) services already exist and are generally offered through Local Authorities. As has been discussed, these services are generally offered as a paid services such that there will be a direct cost to households from using this service. Under option 3 this service will be paid for by producers. This means that there are savings to those household who would have used this service under the baseline scenario. This is a transfer from households to producers.

To calculate the baseline costs (which are savings in option 3) to households for using these services, we can use collection tonnage data associated with the current paid for bulky WEEE collection service operated by LAs[235]. This data is provided for 2018/19 from waste data flow and will our baseline tonnage for our analysis. The tonnage increases by 3% each year which is in-line with the waste growth assumption discussed in previous sections. This is reflected in table 54 below.

Table 54: Tonnage of bulky WEEE which is collected from households by LAs

	2019	2025	2029	2034
Tonnes Collected	64,719	77,278	86,977	100,831

As discussed in the cross-cutting assumption section, an average price per unit of £8.87 per item of WEEE collected through these services has been estimated[236]. As throughout this analysis we assume the average weight of a unit of bulky WEEE is 60kg. By dividing the baseline tonnages collected in each year by 60kg and then multiplying by £8.87 we can estimate the savings to households.

Over the appraisal period this amounts to savings of £131m.

Table 55: Savings to households from no longer paying for bulky WEEE collection (£ millions)

[235] Anthesis, Evidence Gaps, 2022 – Tonnage provided in this research based on Q23 on Waste Data Flow.
[236] Anthesis Evidence Gaps – review of a number of LA charges for bulky waste collections found an average per unit cost of £8.87.

	2025	2029	2034	10-year policy period total
Baseline costs	£11.4m	£12.9	£14.9m	£131.0m

Secondary market profits to reprocessors from additional recycled materials

As described in the cross-cutting assumptions section 6.2.1, additional revenue to reprocessors is estimated by multiplying secondary material prices by the estimated additional WEEE tonnage diverted to recycling from residual. To account for the cost faced by reprocessors during the recycling process, only the assumed profit proportion of this revenue is included as a benefit. This leads to an estimated £78.7m in increased profit to reprocessors over the appraisal period.

Table 56: Secondary market profits to reprocessors from additional recycled materials (£ millions)

	2025	2030	2034	Total (10 years)
Secondary market profits to reprocessors from additional recycled materials	£2.5	£8.5m	£9.8m	£78.7m

Landfill tax saving (LA/waste collector)

Diverting WEEE away from residual disposal route will lead to less WEEE ending up in landfill. This will result in a saving to LAs who currently pay to dispose WEEE collected as residual from households. As described in the section 5.5, we assume that 30% of WEEE sent to residual will be disposed of in landfill. Multiplying the expected tonnage of WEEE diverted away from residual by 30%, and then by the landfill tax rate of £91.35 per tonne, leads to an estimate of £17m over the appraisal.

This is a transfer from the public sector to LAs.

Table 57: Landfill tax savings (£ millions)

	2025	2029	2034	Total (10 years)
Landfill tax savings	£0.5m	£1.9m	£2.1m	£17.2m

Landfill and EfW Gate Fee Savings

As well as landfill tax savings, there will also be other disposal cost savings to LAs: landfill and EfW gate fees. To estimate these savings, the proportion of the estimated tonnage diverted from residual is split between landfill and EfW (30% to landfill and 70% to EfW), and then multiplied by the respective gate fee per tonne rate.

Overall, LAs will save £46m over the appraisal period.

Table 58: Landfill and EfW gate fee savings for LAs (£ millions)

	2025	2029	2034	Total (10 years)
Gate fee savings	£1.4m	£4.9m	£5.7m	£45.6m

7.3 Option 4

This section outlines the ***additional*** costs and benefits attributable to option 4.

7.3.1 Residual WEEE diverted to recycling/reuse in Option 4

Policy option 4 proposes to amend current take-back regulations (Regulation 43)[237]. The amendment would change in-store take-back policies so that larger businesses must offer to take-back WEEE on a 0:1 basis (rather than the current 1:1 take-back obligation). The amendment would also result in the current 1:1 collection on delivery of WEEE from the household (currently charged for), becoming a free 1:1 household collection policy under the new policy proposals.

Defra commissioned research from Anthesis to model this scenario and form estimates of the amount of WEEE that will likely be collected as a result of implementing the extended take-back regulations. The research undertaken has modelled how the implementation of this policy could work, by drawing on data from other nations in Europe who have already introduced similar policies of take-back, to predict how a similar implementation would work here in the United Kingdom.

Since our Options are cumulative; in Option 4, SMW and bulky WEEE kerbside collection will also be implemented, there may be competition between the collection methods. Amended retailer takeback could compete with bulky WEEE collection and SMW kerbside collection. For example, households may choose to return their bulk WEEE through free 1:1 takeback, as opposed to using the free bulky WEEE collection proposed in Option 3. Conversely, households may choose to dispose of their SMW through kerbside collection, instead of returning to store. In their modelling, Anthesis have accounted for the fact that the streams are competing by calculating the marginal impact of each policy on tonnages collected; taking into account the other collection methods (free on-demand bulky WEEE collection and SMW kerbside collection) available to consumers as the policy options are cumulative. Therefore, there is no double-counting of WEEE within this analysis of tonnes collected[238].

Anthesis compared the level of WEEE collected through the current take-back routes (Regulation 43 data), with the potential uplift due to the reforms. As shown in table 59, they have modelled an increase from a 19% to a 58% collection rate[239] for LHA and Cooling equipment, and from 1% and to a 3% and a <1% to a 2% increase in collection rates respectively for Display equipment and SMW[240]. The potential modelled uplift estimates are based on reported data from Ireland and Germany, and feedback from large brands and their experience operating in European markets. Although international benchmarks are used, there is still a potential risk that these represent a high estimate of potential take-back performance for the UK[241].

Table 59: Collection Rates (as proportion of EEE POM data) in Baseline and Option 4[242]

Stream	Baseline[243]	Option 4
Refrigeration	19%	58%
Other LHA	15%	58%
TV and monitors	1%	3%
Other small EEE	<1%	2%

The estimated uplifts in collection rates detailed above are used in this impact assessment to assess the potential uplift in performance of retail takeback tonnages under policy option 4. The percentage capture rates are applied to the placed-on market figures (by category of EEE), to estimate the tonnage of material collected via this route. This uplift of WEEE tonnage is assumed to be diverted from alternative collection routes. For example, for collections of large WEEE, 75% of the tonnage collected through the amended take-back route is assumed to be diverted away

[237] The Waste Electrical and Electronic Equipment Regulations 2013 (legislation.gov.uk)
[238] Option 4 shows the method used to estimate the marginal increase in WEEE collected as a result of option 4. As explained later in this section, it is assumed that a proportion of this is a diversion away from collection systems in previous options. Where this is the case the total tonnage of WEEE collected in option 4 is the marginal increase from option 4, plus any tonnage from previous options minus the tonnage diverted from a previous option.
[239] Collection as a proportion of POM
[240] Anthesis, Evidence gaps 2022
[241] Anthesis, Evidence gaps 2022
[242] This is the marginal impact of option 4. See footnote 212 for details of how this relates to previous options.
[243] Baseline collection is based on the average collected tonnage between 2016-20 and the POM in 2020

from informal collections, which were described in the tonnage assumptions section for option 3. 10% of the tonnage is also assumed to be diverted from HWRC deposits, with the final 15% assumed to be diverted away from bulky waste collections[244].

Alternatively, for small items of WEEE, the assumed diversion from other routes is different to that assumed for large WEEE. This is because the behaviours involved with the disposal of small WEEE are different to larger WEEE. For example, large WEEE cannot easily be thrown in residual waste, whereas small WEEE can. This means that the disposal of large WEEE through the informal sector is more appealing and cheaper, whereas the most convenient and cheapest disposal method for small WEEE currently may be throwing it in residual waste. Therefore, for the tonnage collected through the amended take-back policy, it is assumed that 30% comes from informal collections, 10% from HWRC deposits and 60% from household residual waste[245].

Although there is competition between the collection routes, implementing option 4 provides households with multiple routes to dispose of SMW and bulky WEEE, which addresses the current underlying problems of inconvenience and financial costs of recycling WEEE. To add, it is more convenient, and efficient for a retailer to collect bulky WEEE when delivering a new item of EEE to the household, than for LAs to make additional journeys to collect bulky WEEE. Therefore, even though retailer takeback may divert WEEE from LA bulky WEEE collections, retailer collection is a more efficient and environmentally beneficial route. Option 4 results in additional WEEE being recycled, on top of SMW collections and LA bulky WEEE collections, as shown in table 60.

It is important to note that the assumed change in the proportions of material reused and recycled is the same as what was reflected within table 12 in section 6.2.4

Now that these end flow proportions have been applied to the tonnage of WEEE which is collected, we can compare this final tonnage calculation to the baseline tonnages (and tonnages of option 2 and option 3, to see the marginal impact take-back measures will have in terms of collecting WEEE). It is important to remember that the total amount of WEEE collected through all routes has not changed as a result of the policy implementation. This is because for bulky WEEE, there is assumed to be no hoarding in the system (as has been stated in a previous assumption section). The only change is the increased tonnage which is going to reuse and recycling systems; having been diverted away from EfW and landfill streams. This is how the difference between policy option 4 and the previous policy options has been presented. The diversion away from residual waste, towards recycling and reuse, is depicted in table 60 below and will be used in our analysis when calculating the costs and benefits associated with policy option 4.

Table 60: Tonnage diversion as a result of extended take-back measures

Category	Waste Flow	2025	2029	2034	Total (over 10 years)
LHA	Reuse	3316	11309	13110	104938
	Recycling	43579	148634	172307	1379182
	Recovery (EfW)	-32827	-111960	-129792	-1038884
	Landfill	-14069	-47983	-55625	-445236
SDA	Reuse	193	658	763	6105
	Recycling	2685	9157	10616	84970
	Recovery (EfW)	-2014	-6871	-7965	-63752
	Landfill	-863	-2945	-3414	-27322

[244] This assumption has been based on Anthesis's view of consumer behaviour and recycling behaviours.
[245] This assumption has been based on Anthesis's view of consumer behaviour and recycling behaviours. In general SMW is more likely to be inappropriately disposed of in household residual than bulky WEEE which is more likely to be disposed on in informal routes including fly tipping.

Display	Reuse	43	147	170	1361
	Recycling	301	1026	1190	9524
	Recovery (EfW)	-241	-821	-952	-7619
	Landfill	-103	-352	-408	-3265
Cooling	Reuse	380	1295	1501	12014
	Recycling	5315	18126	21013	168191
	Recovery (EfW)	-3986	-13594	-15760	-126143
	Landfill	-1708	-5826	-6754	-54061

As mentioned, table 60 shows the tonnage diversion between the four end-of-life flow routes. The tonnage diverted towards recycling and reuse increases every year. This is in line with the assumption that waste within the system increases by 3% each year, which is a consistent assumption applied to each policy option and the baseline analysis.

Tonnage collected from each retailer collection route

Policy option 4 requires distributors (i.e., retailers and distance sellers) to collect WEEE via two different routes:

- Distributors must offer takeback on a 0:1 basis (for businesses with annual EEE turnover of over £100k pa[246])[247]. Smaller businesses would continue to offer a 1:1 take-back service
- Distributors must offer a free collection of WEEE from households when they deliver a replacement item (1:1) for large domestic appliances such as fridges/freezers and TVs

Anthesis have modelled overall tonnage diversion levels for each WEEE category as a result of this policy[248]. However, some of the costs associated with collecting and storing this WEEE will differ between the two collection routes. We have no specific evidence to suggest how much WEEE from each category would be collected through each of the two collection methods. As such, for our analysis we have assumed the following:

- All SMW (category 2-10) collected as a result of this option is collected via the in-store take-back route (0:1)[249]
- All bulky WEEE (category 1,11,12) is collected from the household in the free 1:1 collection[250].

It is assumed that, due to the small size and weight of individual items, SMW is more easily deliverable to in-store take-back collection points. Households could also easily take these items in bulk to an in-store take-back if they so desire. Being able to bring multiple smaller items in store without needing to purchase a replacement (which is not always the case when disposing of SMW), is more convenient.

In contrast, bulky WEEE items are far more difficult to take back into store (due to their weight and size) and are more likely to be disposed of when purchasing a replacement. The 1:1 household collection system would therefore be the most convenient option for bulk WEEE.

[246] This the same threshold for retailer/distributor obligations as under the current regulations

[247] It is acknowledged in the consultation document that offering a 0:1 takeback may be challenging for online only sellers. The consultation therefore seeks views on whether online only sellers should have alternative means of meeting these obligations. Online only sellers will be expected to provide a 1:1 takeback. The service should be of at least equivalent convenience to that currently provided by businesses selling via stores. This could for example be offered via a collection on delivery service, access to local drop off points, a system of pre-paid or refundable returns akin to that provided for return of unwanted purchases.

[248] Anthesis, Evidence Gaps, 2022

[249] This is based on the expertise of Anthesis rather than any particular consumer behaviour research

[250] This is a simplifying assumption. Some consumers may still collect from store.

Through conversations while working on the Defra commissioned WEEE research project[251], Anthesis confirmed that in the absence of data, these assumptions are the best approach for our analysis.

7.3.2 Reduction in Fly Tipped WEEE in Option 4

As previously mentioned in the methodology for the reduction in fly-tipping caused in option 3, the total reduction in fly-tipping will be 10% regardless of how many policy options are introduced to collect bulky WEEE. As the options are cumulative, we will simply be adding an additional collection method of WEEE to the collection method added in policy option 3 (LA bulky WEEE household collection). This means that there will be no marginal impact on the reduction in fly-tipping as a result of adopting policy option 4. The diversion from fly-tipping will be split between the two collection methods, however, the overall reduction in fly-tipping tonnage will remain at 10%.

The calculated split of fly-tipping tonnage that will be diverted from each of the two policies is assumed to be equal to the proportional split of the increased total tonnage of bulky WEEE that is collected as a result of implementing free retailer bulky WEEE 1:1 collections, and free LA bulky WEEE collections. To note, this tonnage split does not include the total tonnage currently collected in the baseline.

Table 61: Proportional split of WEEE collected from retailer kerbside take-back and LA Bulky WEEE collections

Collection Route	Total increased tonnage collected (10-year policy period)	Proportion
LA Bulky WEEE collection	1,328,863	20%
Retailers take-back (1:1 at kerbside)	5,397,123	80%
Total	6,725,987	

Source: DEFRA modelling based on Anthesis Evidence Gaps research

Table 61 depicts the proportion of WEEE that is collected through each route of collection proposed in the policies. As mentioned, for the purposes of our analysis, we have assumed that if both collection routes are introduced, the diverted tonnage of WEEE away from fly-tipping as a result of both collection routes will reflect the proportional split each policy is estimated to collect (with the total fly-tipping diverted equal to 10% of the yearly tonnage of fly-tipped WEEE).

Table 62: Tonnage diverted from each of the proposed collection routes – Midpoint tonnage

Collection Route	2025	2029	2034	10-year policy period total
LA Bulky WEEE collection	217	245	284	2493
Retailer take-back (1:1 at kerbside)	883	994	1152	10124
Total	1101	1239	1436	12617

Source: DEFRA modelling

[251] DEFRA consulted with Anthesis who confirmed in the absence of data this would be a reasonable assumption.

Table 62 highlights the assumed tonnage split (diversion away from fly-tipping) between the two collection routes if policy option 4 was adopted. As mentioned, the total fly-tipping diversion (in tonnes) will be the same, regardless of whether option 3 or option 4 was adopted. As can be seen in the total section of table 62 above, and the midpoint analysis tonnage from table 44 in the option 3 tonnage diversion section; they are the same. Therefore, there are no marginal changes to the amount of tonnage diversion when implementing retailer take-back from households.

7.3.3 Annual costs

Enforcement costs

As discussed in the cross-cutting assumptions section, we expect that regulators will face no additional costs under the reformed system.

Table 63: Additional Enforcement Costs to Regulators (£)

Additional Enforcement Costs to Regulators	£0

Scheme Administrator costs

We do not envisage a role for the Scheme Administrator arising from changes to the distributor obligations. There are therefore no additional Scheme Administrator costs in option 4.

Table 64: Additional Scheme Administrator Operational Costs (£)

Additional Scheme Administrator Operational Costs	£0

Handling and collection costs to retailers

Implementing extended requirements on retailers, producers, and internet sellers to facilitate take-back in-store on a 0:1 basis, and from the household on a 1:1 basis, will result in additional handling and collection costs being incurred by these businesses.

Anthesis modelled retailer data on estimated take-back operational costs so that they could provide estimated cost per tonne collection and handling costs[252]. Predicting exact retailer costs is difficult, particularly for the free household collection on a 1:1 basis because the cost of delivering the replacement item is already factored into the service costs. Data gathered through discussions with retailers (who provided some cost per tonne and per unit data) has produced a range of costs associated with the collection, handling, and storage of WEEE collected through this amended take-back scheme[253]. A mid-point of these costs has been used for the initial analysis and the two lower and upper bound extremes included in our sensitivity analysis. The costs have been detailed in table 65 below.

Table 65: Costs of handling and collecting WEEE within take-back policy implementation (£ per tonne)

Stream	Distributor in store management cost	Distributor doorstep collection and warehouse operational cost	Distributor logistics cost to PCS network cost per tonne	Scenario	Cost associated with in-store take-back	Cost associated with retailer household collection
Cooling	£10.00	-	£34.00	Refrigeration low point		£34.00
				Mid-Point		**£51.00**
	£15.00	£34.00	£34.00	Refrigeration high point		£68.00
LHA	£10.00	-	£34.00	LHA low estimate		£34.00

[252] Anthesis, Evidence gaps, 2022

[253] As this is commercially sensitive data, disaggregated costs were not provided. However, based on conversations with Anthesis we feel it is reasonable to assume that these costs include fuel costs, labour costs, capital costs, storage costs, etc.

				Mid-Point		**£51.00**
	£15.00	£34.00	£34.00	LHA high estimate		£68.00
Display	£30.00	-	£50.00	Display low estimate		£50.00
				Mid-Point		**£100.00**
	£45.00	£100.00	£50.00	Display high estimate		£150.00
SMW	£192.00	£64.00	£160.00	SDA low estimate	£352.00	
				Mid-Point	**£400.00**	
	£288.00	£96.00	£160.00	SDA high estimate	£448.00	

Source: Defra, based on Anthesis (2022)

As table 65 shows, there are two mid-point cost per tonne values (in bold) for each of the 1:1 household collection and 0:1 in-store take-back systems. It is assumed that in-store take-back costs only include the distributor in-store management cost and the distributor logistics cost to producer compliance scheme network cost per tonne. As we have assumed that only SMW is collected through the in-store take-back method only the final in-store costs for this method have been presented in the above table (as seen in column “Cost associated with in-store take-back”).

As has been mentioned, the 1:1 household collection includes all bulky WEEE assumed to be collected from option 4. The collection costs associated with this bulky WEEE collection route are Distributor doorstep collection and warehouse operational costs, alongside distributor logistics cost to producer compliance scheme network cost per tonne. The mid-point cost per tonne for collecting bulky WEEE from households is presented in table 65 above. These mid-point costs are then multiplied by the tonne of WEEE collected from take-back policy implementation to calculate the costs faced by retailers of handing and collecting WEEE under policy 4.

Using these assumptions, we estimate these costs to be £318m over the appraisal period.

Table 66: Cost of handling and collection of WEEE to retailers (£ millions)

	2025	**2029**	**2034**	**10-year policy period total**
Handling and collection costs to retailers	£27.8m	£31.3m	£36.2m	£318.4m

Treatment costs business

The assumed cost per tonne of treating WEEE was discussed in the cross-cutting assumptions section. Multiplying the relevant cost per tonne by the estimated WEEE diverted to recycling from residual provides an estimate of £44m over the appraisal period.

Table 67: Costs to businesses of treating WEEE (£ millions)

	2025	**2029**	**2034**	**10-year policy period total**
Treatment costs to retailers	£1.4m	£4.7m	£5.5m	£44.0m

Communication campaigns costs to producers

As set out in the cross-cutting assumptions section, the costs to producers for Option 4 are likely to be minimal and have not been quantified since they involve simple changes to current messaging. Producers will be asked about the effect of these communication costs during the consultation and these assumptions will therefore be reviewed for the final impact assessment.

Table 68: Communication campaigns costs (£ millions)

	10-year policy period total
Communication campaigns costs	£0m

Increased carbon from additional weight on journeys

As with option 2, it is assumed that no additional journeys will take place as a result of this policy option. It is assumed that retailers will pick up WEEE from households at the same time as delivering new EEE products. However, where this WEEE would not have been collected by retailers previously, this represents an increase in the weight of the load of collections, leading to higher fuel usage[254].

However, it must be acknowledged that where this WEEE would not have been collected by retailers previously, retailer takeback may replace journeys by households in private vehicles to dispose of WEEE. Therefore, the carbon from additional weight on journeys may be an overestimate of the impact of the costs of the policy.

As stated previously, we assume that retailers would charge for this service currently, and these charges have been assumed to fully represent the costs to the retailer of this service. As such, our estimates of the additional cost to retailers are assumed to already include increased fuel costs. However, we still need to estimate the additional CO2e from this fuel usage.

The same Miles per Gallon (MPG) change calculations as in option 2 are used to estimate the impact of the additional weight. However, as we do not know the total distance covered, a slightly different overall methodology is used. The CO2e per tonne of WEEE collected in option 3 (assumed to be similar to option 4 due to both the type of WEEE collected, and the ad hoc nature of collections) is used to estimate the total CO2e under option 4 based in the total tonnage of WEEE collected. This is multiplied by the difference in MPG to estimate the additional CO2e as a result of the policy, and then multiplied by the BEIS carbon prices[255].

Table 69: Increased carbon from additional weight on journeys (£)

	2025	2029	2034	Total (10 years)
Increased carbon from additional weight on journeys	£568	£679	£850	£7,005

Landfill tax loss (HMT)

Diverting WEEE away from residual disposal route will lead to less WEEE ending up in landfill. This will lead to a loss of landfill tax to the public sector. As described in section 5.5, we assume that 30% of WEEE sent to residual will be disposed of in landfill. Multiplying the expected tonnage of WEEE diverted away from residual by 30%, and then by the landfill tax rate of £91.35 per tonne leads to an estimate of £48m over the appraisal period.

Table 70: Landfill tax loss to the public sector (£ millions)

	2025	2029	2034	Total (10 years)

[254] Note there may be fuel and carbon savings as a result of households no longer taking WEEE to collections points however these have not been quantified.

[255] Valuation of greenhouse gas emissions: for policy appraisal and evaluation 2021, Annex 1, https://www.gov.uk/government/publications/valuing-greenhouse-gas-emissions-in-policy-appraisal/valuation-of-greenhouse-gas-emissions-for-policy-appraisal-and-evaluation#annex-1-carbon-values-in-2020-includes-pe-tonne-of-co2

Landfill tax loss to the public sector	£1.5m	£5.2m	£6.0m	£48.4m

7.3.4 Annual benefits

Carbon savings from changes in flows

By applying carbon factors and BEIS carbon prices (as set out in the cross-cutting assumptions section) to the estimated tonnages of WEEE diverted from residual disposal to recycling and reuse under option 4, we estimate total additional territorial GHG benefits of £556.1m over the 10-year appraisal period. As mentioned in section 6.4.1, this is an underestimate of the total benefits in emissions reductions from policy Option 4 since it does not take into account the international emissions savings from reduced reliance on virgin material extraction and production as well as manufacturing.

Table 71: Net carbon reduction from tonnage diverted from residual to recycling/reuse (£ millions)

	2025	2029	2034	Total (10 years)
Net carbon reduction resulting from tonnage diverted from residual to recycling/reuse	£16.2m	£58.8m	£73.6m	£556.1m

Fly-tipping disamenity and collection costs savings

We have not quantified any additional fly-tipping benefits under option 4 compared to option 3. This is due to a lack of evidence of the exact impact of each policy on fly-tipping specifically. Instead, it is assumed that the same reduction fly-tipping seen in option 3 would also occur in option 4 in the absence of option 3; this is to say that that the lack of quantified estimates for option 4 does not mean that we assume that option 4 would have no impact on fly-tipping, rather that we do not have suitable evidence to estimate it.

Savings to households from no longer paying for retailer takeback collections

Retailers currently tend to charge households to remove WEEE when delivering a new item (on a 1:1 basis). As under option 4 retailers will no longer be able to charge for this service, this will be a saving to households. Based on information provided by industry stakeholders, we assume that consumers pay £20 per item of WEEE removed. Based on the assumption that the average bulky WEEE item is 60kg[256], and the tonnages collected by retailers on a 1:1 basis currently. This £20 per item is estimated to relate to £333.33 per tonne. Multiplying the current tonnage collected by this figure suggests that households would have paid £517.8m for these services under the baseline and so under option 4, this is a saving to households[257].

Table 72: Savings to households from no longer paying for retailer takeback collections (£ millions)

	2025	2029	2034	Total (10 years)
Savings to households from no longer paying for retailer takeback collections	£45.2m	£50.8m	£58.9m	£517.8m

Secondary market profits to reprocessors from additional recycled materials

As described in the cross-cutting assumptions section, additional revenue to reprocessors is estimated by multiplying secondary material prices by the estimated additional WEEE tonnage diverted to recycling from residual. To account for the cost faced by reprocessors during the

[256] As used in the rest of the analysis

[257] This could then be passed back to consumers through higher prices. However, as the extent to which this occurs is based on the decisions of businesses and the market structure they work within, this is not accounted for in the cost benefit analysis. The extent to which increased costs to businesses may be passed on to consumers is discussed in the wider impacts.

recycling process, only the assumed profit proportion of this revenue is included as a benefit. This leads to an estimated £296m in increased profit to reprocessors over the appraisal period.

Table 73: Secondary market profits to reprocessors from additional recycled materials (£ millions)

	2025	2030	2034	Total (10 years)
Secondary market profits to reprocessors from additional recycled materials	£9.4m	£32.9m	£37.0m	£296.4m

Landfill tax saving (LA/waste collector)

Diverting WEEE away from residual disposal routes will lead to less WEEE ending up in landfill. This will lead to a saving to LAs who currently pay to dispose of WEEE collected as residual from households. As described in section 5.5, we assume that 30% of WEEE sent to residual will be disposed of in landfill. Multiplying the expected tonnage of WEEE diverted away from residual by 30% and then by the landfill tax rate of £91.35 per tonne leads to an estimate of £48m over the appraisal.

This is a transfer from the public sector to LAs.

Table 74: Landfill tax savings to LA/ waste collector (£ millions)

	2025	2029	2034	Total (10 years)
Landfill tax savings	£1.5m	£5.2m	£6.0m	£48.4m

Landfill and EfW gate fee savings

As well as landfill tax savings, there will also be other disposal cost savings to local authorities in no longer having to pay landfill and EfW gate fees for WEEE that is diverted away from residual to recycling and reuse. To estimate these savings, the proportion of the estimated tonnage diverted from residual is split between landfill and EfW (30% to landfill and 70% to EfW), and then multiplied by the respective gate fee per tonne rate.

Overall, LAs will save £128m over the appraisal period.

Table 75: Landfill and EfW gate fee savings (£ millions)

	2025	2029	2034	Total (10 years)
Gate fee savings	£4.1m	£13.8m	£16.0m	£128.2m

7.4 Option 5

This option is the same as Option 4, but with the additional aspect of designating OMPs as a new class of producers. This means that businesses based in the UK who operate a website, or any other means by which information is made available over the internet, through which persons based outside the UK, other than the operator, can offer EEE for sale in the UK (whether or not the operator also does so), will have an obligation. This new requirement is a cost transfer from the overseas seller to the OMP designed to reduce the scale of noncompliance with the producer obligations in the WEEE Regulations in respect of goods sold online.

The proposal is designed to ensure OMPs contribute to the costs of collection, treatment, recovery and reuse or recycling of WEEE that reflects the UK market share of their overseas online sellers. By designating them as a new class of producer, OMPs would stand in the shoes of the overseas sellers on their platform and be obligated to register with a Producer Compliance Scheme and submit the same data as other producers. This is consistent with government proposals to place

obligations on online marketplaces as part of wider proposals to introduce extended producer responsibility for packaging[258].

Costs and benefits

No additional costs and benefits have been quantified on top of those presented in option 4. The main intention of this policy is to ensure that producers of all in scope EEE products are contributing to collection costs under the WEEE regulations. As such the key expected outcome of option 5 is that household collection costs (as set out in option 2 and 3) are spread across producers in a more equitable way, such that there is reduced opportunity for producers to free ride. The most significant impact of this option is therefore the redistribution of costs across producers rather than imposing greater obligations on producers as a whole.

Redistribution of costs

The main factor in determining the total cost profile to be met by producers is the amount of WEEE that is collected. Under the current system, compliance schemes (on behalf of their producer members) must ensure enough WEEE is collected to meet Government met targets. Targets are set on a tonnage basis and calculated based on the tonnage of WEEE collected over the previous 5 years. This is contrast to packaging targets which are set on a percentage basis, such that packaging producers must ensure that a certain proportion of packaging placed on the market by registered producers in a given year is recycled.

In the case of WEEE, therefore, the amount of EEE placed on the market by registered producers does not impact the total target to be met. This means that the aggregate amount to be financed by EEE producers is fixed based on the amount of WEEE collected in previous years rather than how much is reported as placed on the market by registered producers; a change in the number of producers registered with the regulator does not impact the aggregate cost of be financed. The target amount of WEEE to be collected is distributed across compliances schemes based on the market share of their producer members. Compliance schemes finance enough WEEE collections to meet their target and then recover costs from their members.

In a similar way, it is assumed that the cost to producers of setting up household collection systems (options 2 and 3) will not be dependent on the amount placed on the market by registered producers.

Overall, therefore, option 5 is not expected to alter the total cost to producers of collecting and recycling WEEE under the regulations. Rather by ensuring that more producers are meeting their obligations, aggregate costs will be spread over more producers.

Transition costs

All the main impact is expected to be a redistribution of costs across obligated producers, there may be some transition costs as a result of this option:

- **OMPs** will face costs to set up additional billing systems to recover cost from EEE producers selling through their platform[259]. They will also face costs of joining a compliance scheme and submitting data on the amount of EEE sold through their platform.

- **EEE producers selling through OMPs** may face additional familiarisation costs.

[258] https://www.gov.uk/government/consultations/packaging-and-packaging-waste-introducing-extended-producer-responsibility
[259] OMPs will be able to decide whether/how to recover these costs from EEE producers

- **Compliance schemes** will face costs associated with becoming familiar with the regulations involving OMPs in order that they can ensure their members are meeting the regulations.

Due to data limitations, we have not been able to quantify these additional costs as this stage and will seek to gain a broader understanding of these potential costs during the consultation process.

As highlighted, these proposals are in line with those expected to be implemented for packaging producers under pEPR. The final pEPR impact assessment[260] included estimates of the number of producers in scope of these changes, and quantified costs. Using data on OMPs operating in the UK[261], the pEPR impact assessment estimates that 46 online marketplaces would be in scope of packaging regulations. Data provided by packaging stakeholders was provided to estimate the familiarisation costs to be faced by these producers. As these costs are specific to the packaging regulations, it has not been deemed appropriate to use them to the additional cost on WEEE OMPs. Further research will be conducted through the consultation to ascertain appropriate costs for EEE OMPs.

7.5 Option 6

This option is the same as option 5, albeit with the addition of a new category for vapes in the WEEE regulations. This will ensure that the cost of recycling vapes falls solely on vapes producers, enhancing the incentive on these producers to increase the recyclability of their products, and lowering the recycling costs.

Costs and benefits

No additional costs and benefits have been quantified on top of those in the previous options. All else remaining equal, creating a new category for vapes is not expected to increase overall costs on producers (albeit some minimal transition costs discussed later). This is because the cost of recycling vapes collected for recycling under the regulations would have been met by producers under the current arrangement. Creating a new category would redistribute costs from all category 7 producers, to vapes producers specifically.

Redistribution of costs

Under the current regulations compliance schemes (on behalf of producers) are obligated to finance the recycling of all WEEE returned by householders to HWRCs and any WEEE delivered to them by retailers (for example, that which has been returned to store by consumers under 1:1 takebacks). Where compliance schemes finance the cost of recycling WEEE in a particular category, they recover the costs from their producer members who place EEE from that category on the market. Therefore, all vapes collected through these routes should be recycled and financed by producers in the relevant category (7). Similarly, it is expected that the Scheme Administrator for household collections under the reforms will allocate costs to producers based on the amount of each category of WEEE collected.

This option (all being equal) therefore does not create additional collection and recycling costs to producers in aggregate, rather redistributes costs away from other category 7 producers to exclusively vapes producers.

Creating a new category for vapes producers would also increase the flexibility for Government to set specific targets on vapes producers. Were the Government to set ambitious targets on vapes producers (higher than the amount of vapes that would have been collected for recycling under the previous options), this would lead to additional costs to vapes producers. The

[260] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1063588/epr-final-impact-assessment.pdf
[261] https://www.webretailer.com/marketplaces-worldwide/online-marketplaces/

Government are not currently consulting on what targets should be set following the introduction of the reforms, it is therefore not possible to estimate the additional cost to vapes producers at this stage.

It must be noted that the primary aim of creating a new category is to increase fairness in the distribution of costs across producers, and ensure the polluter pays principle by placing the full cost of recycling vapes on vapes producers. As such, not quantifying additional vapes collected for recycling (and therefore additional costs) is reasonable at this stage. This will be tested further through the consultation.

Although we have not quantified the change in vapes collected as WEEE from creating a new category of EEE, we would expect there to be an increase in the number of vapes collected for recycling as a result of the reforms on a whole. Both kerbside SMW collections and enhanced retailer takeback of WEEE will provide more convenient routes for consumers to recycle vapes. Communications campaigns across all options will also provide consumers with more knowledge of what can be recycled and where. In addition, the consultation will also seek views on whether further policy intervention is required to minimise the environmental impacts of vapes through improper disposal.

Transition costs
All the main impact is expected to be a redistribution of costs across obligated producers, there may be some transition costs as a result of this option:

- **Vapes producers** may face additional familiarisation costs however these are expected to be minimal as they are already required to join a compliance scheme, register with the regulator and report data, and contribute to the cost of collection, treatment, recycling, and recovery of WEEE under the current regulations.

- **Compliance schemes** may also face familiarisation costs, however these should be minimal as vapes producer members will be obligated in the same way as other category producers.

- **Regulators** may face costs associated with making minor changes to their reporting systems to include the new category

Interaction with health impacts
The environmental impacts policies involving vapes need to be balanced with health impacts. There are clear public health benefits to using vaping products as an alternative to smoking, and the government encourages adult smokers to switch to vapes as they are substantially less harmful than smoking. Vaping (using an e-cigarette) is an important tool to help the government achieve its ambition for England to be smokefree by 2030.

As such, Defra are working closely across government, including with the Department of Health and Social Care (DHSC) to ensure policies involving vapes meet the twin goals of improving environmental and health outcomes for society. In October 2023, government published a UK wide consultation: ‘creating a smokefree generation and tackling youth vaping’ proposing a number of actions, including placing restrictions on the sale and supply of disposable vapes.

7.6 Non-Quantified Costs and Benefits

Benefits

- Benefits of communications campaigns – the quantified increase in recycled WEEE from policies in option 2 and 3 are currently modelled based on evidence on the introduction or

change (from free to charged) of local household collection schemes. Although these local collections likely included some communication to households, we anticipate that there will be more significant increases in the amount collected by holding significant, nationwide, targeted communications campaigns which are currently not captured in the modelling.

- CRM & treatment standards - due to limitations in the evidence base, we have been unable to include the monetised benefits directly associated with diverting recyclable critical raw materials from residual streams. This area is also closely associated with treatment standards which is out of scope of this impact assessment, DEFRA are seeking evidence and views on this in the accompanying consultation document.
- Increase to reuse markets – an increased reuse market would increase competition, potentially leading to higher quality used products and more choice for consumers. This would particularly benefit those on lower incomes by increasing the availability of higher quality but cheaper EEE items.
- Natural capital benefits – reducing the volume of WEEE that enters the residual waste stream, and increasing reuse recycling, will have several benefits for the natural environment, beyond a reduction in greenhouse gas emissions. The interactions of these benefits are complex and so have not been quantified; these natural capital benefits have been described in section 9.2.
- Consumer experience – Increasing the availability and understanding of household collection options will have benefits for consumers, saving households' time and effort spent recycling their items. Where bulky WEEE is collected by LAs or retailers and replaces specific journeys by households to dispose of WEEE, households will face lower fuel costs. For larger items of WEEE, there are risks to households attempting to move heavy items, which could cause injuries; a household collection service would reduce the need for households to move large items themselves.

<u>Costs</u>

- Communications costs in option 4 – as stated in the specific section, we acknowledge that there are likely to be some transition costs to retailers through changes to their communication obligations under the proposals set out. We expect these to be minimal however have not currently quantified these and will seek to gain a better understanding of these costs through the consultation.
- Familiarisation costs in option 5 – similarly, we are aware that there may be some transition and familiarisation costs to OMPs based on the proposals set out in option 5. Again, these costs will be explored through the consultation process.

Section 8: Small and Micro Businesses and Medium-sized Business Assessment

8.1 Medium-sized business assessment

We do not have data on the proportion of medium (50-499 employees[262]) obligated WEEE producers. ONS publish data on the number of businesses and turnover by business size for different sectors[263]. EEE producers are most likely to fall within SICs 26 (Manufacture of computer, electronic and optical products) and 27 (Manufacture of electrical equipment). ONS data suggests that within these sectors, 4.7% of businesses are medium sized businesses. These businesses generate 47.5% of turnover in these sectors.

Table 76: Proportion of businesses and turnover by employee number for SICs 26 and 27

[262] Based in the BEIS definition of a medium-sized business: https://www.gov.uk/government/publications/better-regulation-framework/medium-sized-business-regulatory-exemption-assessment-supplementary-guidance

[263] https://www.gov.uk/government/collections/business-population-estimates

Business Size	Proportion of businesses	Proportion of turnover
Micro (0-9 employees)	83.4%	8.1%
Small (10 – 49 employees)	11.7%	16.7%
Medium (50 – 499 employees)	4.7%	47.5%
Large (500+ employees)	0.3%	27.8%

Based on the simplifying assumption that turnover is somewhat correlated with the number, or tonnage, of EEE products placed on the market by a business, this would suggest that excluding all businesses with less than 500 employees would exempt producers handling almost two thirds of EEE from obligations in total. This would leave 0.3% of businesses, representing just over a third of EEE placed on the market, to cover the full cost of collecting and treating WEEE placed on the market by the other 99.7% of producers.

As well as placing a disproportionate financial burden on non-excluded businesses, by requiring producers generating 27.8% of the turnover in the sector to pay 100% of the cost of collecting and treating WEEE, this would not be in line with the polluter pays principle. This would dilute incentives on producers to consider the recyclability of their products and minimise recycling costs.

8.2 Small and Micro Business Assessment

Similarly, table 76 also shows that small and micro businesses make up 95% of businesses and produce 25% of turnover in these sectors. Again, by excluding all small and micro businesses, businesses producing a quarter of the turnover in the industry would not be required to contribute to costs, leaving this cost to fall on the remaining businesses.

Despite this, it is recognised that there is a need to minimise the impact on the smallest businesses. Measures within the current regulations to reduce the burden on smaller producers and distributors are outlined below.

Under these measures, small businesses are defined by the tonnage of WEEE placed on the market or the turnover from EEE sales each year, rather than by employee size. It is acknowledged that this is a variation on how SMBs are generally defined (i.e., by employee size). RPC guidance recognises that employee size might not always work perfectly as an indicator of SMBs[264]. Under the WEEE regulations, the use of tonnage and turnover are used to ensure that the main obligations apply to all businesses placing a significant amount of EEE on the market, whilst also reducing the burden for the smallest businesses.

It should be noted that an individual producer's share of collection and treatment costs are (and will continue to be), calculated on a market share basis, such that those that sell less EEE face lower overall costs. ONS data[265] shows a clear correlation between business size by employee numbers and average turnover per business[266]. As turnover is likely to be significantly related to sales, this suggests that smaller businesses will face a smaller overall financial obligation under the WEEE regulations. Any small or micro business obligated under the regulations will therefore face financial obligations proportionate to their size.

The consultation will seek views on whether the de minimis thresholds set out below will remain appropriate under the reforms.

[264]https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/827960/RPC_Small_and_Micro_Business_Assessment__SaMBA___August_2019.pdf
[265] https://www.gov.uk/government/collections/business-population-estimates
[266] For example, in SICs 26 and 27, the average turnover for businesses by size are as follows: Micro (£0.2m), Small (£2.9m), Medium (£21.2m), Large (216.5m)

Small Producer Obligation – The 2013 WEEE Regulations introduced a de minimis threshold of 5 tonnes of equipment placed on the UK market annually. Producers who fall below that threshold are required to register with the Environment Agency and report the tonnage they place on the UK market annually in each of the 14 categories of equipment defined in the 2013 Regulations. A fee of £30 is payable. This contrasts with a registration fee of between £100 and £750 for producers placing equipment on the market above that threshold. In addition, large producers are also required to join a Producer Compliance Scheme and in the case of those trading in household equipment they are required to report data quarterly rather than annually.

In addition to the reduced administrative burdens listed above, small producers do not have to contribute to the costs of collection, treatment, reuse/recycling/recovering of WEEE in line with the targets set annually by the Secretary of State. WEEE arising from product placed on the market by small producers is financed by those producers above the de minimis threshold. In 2022, there were 3,320 small producers registered with the Environment Agency, compared to 3,139 other producers. There are no plans to change the de minimis threshold under the proposed changes to the WEEE regulations.

Distributor Obligations – The 2013 WEEE Regulations require distributors to offer a 1:1 take back service for unwanted EEE from customers on purchase of a similar product. This applies to all distributors unless they are a member of a Distributor Takeback Scheme (DTS). The regulations state that the Secretary of State, "…may after consultation with such persons or bodies as appear to him representative of the interests concerned, approve a distributor take back scheme…". The DTS allows an alternative method for distributors to comply with their take back obligations (through joining the scheme). Fees raised through the DTS are used to support local initiatives designed to drive up collections of household WEEE for reuse and recycling.

Currently Valpak (a WEEE compliance scheme) run a DTS covering the whole of the UK. This scheme was approved by the Secretary of State based on a proposal that it could offer membership to distributors with a turnover of under £100k per year in EEE sales (as proposed by Valpak in their application), or if they sell online only. This option provides smaller retailers with a choice of compliance options and avoids the need for the business to make provision to collect WEEE in store and make the necessary arrangements for the transportation of that WEEE to a point nominated by a producer compliance scheme for it to be recycled or prepared for reuse. Approval for this iteration of the scheme was given for the period 1st January 2021 until 31st December 2023. Once this period comes to an end, further consultation and approval would be needed to maintain the scheme. In anticipation of this, the WEEE consultation (which this IA accompanies) will ask for views on whether £100k remains an appropriate threshold for schemes of this nature. Additional consultation will then occur based on any suitable bid for approval once received.

Our proposed policy measure to mandate distributors go beyond the current take back requirement for WEEE from householders and instead offer a 0:1 in store take back service will only affect those distributors who currently sell above the threshold of £100k turnover in EEE sales per year. Smaller distributors will therefore continue to have flexibility of compliance options.

Section 9: Wider Impacts

9.1 Carbon analysis

As part of their modelling for the IA, Anthesis provided us with estimated tonnages of carbon dioxide emissions for WEEE from reuse, recycling, EfW, and landfill for the baseline and for each policy scenario[267]. The tonnes of carbon dioxide emissions they provided were a product of the tonnage changes in WEEE flows across the appraisal period[268], the material make-up of a typical tonne of WEEE, which is assumed to be constant across the appraisal period[269], and WRAP's

[267] "Research to identify and address gaps in existing WEEE data", DEFRA, by Anthesis; October 2022
[268] Anthesis (2022) analysis of the baseline WEEE compared to the WEEE waste flow under the policy
[269] European Commission analysis of the WEEE value chain summarised by Anthesis to Steel, Aluminium, Glass, and Dense Plastics.

Carbon Waste and Recycling Metric (WARM), specific to the waste flow of each material[270]. WRAP's carbon WARM factors include carbon dioxide emissions resulting from the extraction and refining of the raw material, the production of a material product, the end-of-life collection, the emissions associated with the treatment or disposal option, and the emissions offset by the treatment or disposal option[271]. They exclude the production of the finished product, packing and filling, distribution, and use, since WRAP believes that this is a "realistic representation of the UK recycling system" which produce materials as a raw output rather than finished consumer products[272].

Whilst Anthesis's general methodology of calculating estimated carbon impacts is similar to our own, we did not monetise and use the carbon dioxide tonnages from Anthesis in our model since WRAP's Carbon WARM tool utilises a consumption-based approach to allocating emissions from the production of products and services, which is at odds with the territorial approach required for impact assessments. The consumption-based approach of WRAP's carbon WARM allocates production emissions to the country in which the product was consumed. WRAP asserts that they use a consumption-based emissions approach because their aim is to "quantify the global emissions impact of treating products and materials at end of life"[273]. On the other hand, this impact assessment employs a territorial approach that quantifies emissions based on the country in which the EEE were produced, so only emissions associated with EEE produced in the UK are counted in the carbon production emissions.

As a result of this difference in approach, the carbon factors from WEEE provided by Anthesis have not been monetised and are not included in the modelling for our cost-benefit analysis. However, it is useful to present the carbon tonnages outlined in Anthesis as they show increased carbon savings from the policy proposals, which demonstrates that the policy proposals could have wider benefits than those quantified in our NPV. The carbon factors for WEEE calculated by Anthesis are shown below in table 77:

Table 77: WRAP Carbon WARM Factors (Used by Anthesis)

	Un-normalised values (kg.CO2eq/tonne)				**% Of WEEE by material**
Material	Closed loop recycling	Open loop recycling	Recovery (EfW)	Landfill	Composition of WEEE
Steel	-1062	-	19	9	55%
Aluminium	-7479	-	24	9	12%
Glass	-326	33	8	9	7%
Plastic	-90	205	1691	9	26%
Weighted for WEEE material mix	-1665	56.6	461.2	9	

This is an important difference in approach since the UK imports a high volume of EEE (and the materials that make up EEE) from abroad[274] and since the carbon emissions from production of these EEE imports are not accounted for within our model, our carbon benefits may be an underestimate of the possible carbon savings from increased reuse and recycling under the policy options. Therefore, this variation in approach can partially account for our net carbon benefits being below the carbon savings estimates in the Anthesis Report, as shown below in table 78. For example, for policy option 4, we estimate a net carbon benefit of carbon avoided over the 10-

[270] Carbon Waste and Resources Metric | WRAP
[271] Carbon Waste and Resources Metric | WRAP Pg. 7
[272] Carbon Waste and Resources Metric | WRAP Pg. 8
[273] Carbon Waste and Resources Metric | WRAP pg. 7
[274] Unpublished WRAP analysis, using Eurostat data

year policy period of 2082kt, whereas Anthesis estimate a net carbon saving of 3406kt. When taking into account the production emissions from the UK consumption of imported EEE, as in the Anthesis report, there are increased carbon benefits of policy action and hence increased benefits for society from intervention.

Table 78: A Comparison of this Impact Assessment's Territorial-Based Net Carbon Benefits and Consumption-Based Net Carbon Benefits for each Policy Option

	Net Carbon Benefit: Carbon Avoided Over the 10-Year Policy Period (kt) – marginal impact of each policy	
Policy Option	Territorial	Consumption
2	702	1091
3	608	1210
4	2082	3406

9.2 Natural capital benefits

When WEEE is not reused or recycled, it produces a number of environmental and social negative externalities, that the policy options seek to address. Therefore, there will be a plethora of natural capital benefits to society as a result of the policy options.

According to HM's Treasury's Green Book, natural capital is defined as:

"Natural capital includes certain stocks of the elements of nature that have value to society, such as forests, fisheries, rivers, biodiversity, land, and minerals. Natural capital includes both the living and non-living aspects of ecosystems."[275]

Some of these natural capital benefits of the reforms have been monetised and included in the cost benefit analysis, such as carbon emissions from changes in flows of WEEE and increased fuel use, and disamenity from WEEE fly-tipping. However, several natural capital benefits, which are outlined below, have not been quantified in the cost-benefit analysis due to complicated interactions and a lack of data making it hard to quantify these effects for WEEE:

- Reduced environmental negative externalities (to soil, water, and wildlife) from fly-tipping.
- Reduced environmental negative externalities from raw material extraction and EEE production.
- Reduced value loss from sending critical raw materials to landfill/incineration.
- Reduced social and environmental negative externalities from landfill.

Landfill

A reduction in demand for landfill as WEEE is diverted away from landfill towards reuse and recycling as a result of the proposed reforms will result in a reduction in the negative externalities from landfill, which is a natural capital benefit. Many electricals contain hazardous materials which are volatile and not biologically degradable, including arsenic, cadmium, lead, mercury and a number of brominated flame retardants[276]. For example, brominated flame retardants are classified as Persistent Organic Pollutants meaning they need to be irreversibly destroyed to avoid their impacts entering the human and animal food chain[277]. Hazardous materials from WEEE in landfill can cause degradation and pollution of soil and leaching which contaminates water sources[278][279][280]. By ensuring that more WEEE is diverted away from landfill, more hazardous

[275] The Green Book: appraisal and evaluation in central government, The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk), page 63
[276] Waste Electrical and Electronic Equipment recycling (WEEE) (hse.gov.uk)
[277] Using persistent organic pollutants (POPs) - GOV.UK (www.gov.uk)
[278] A review of the environmental fate and effects of hazardous substances released from electrical and electronic equipments during recycling: Examples from China and India - ScienceDirect
[279] Electronic waste and their leachates impact on human health and environment: Global ecological threat and management - ScienceDirect
[280] Electronic waste and their leachates impact on human health and environment: Global ecological threat and management - ScienceDirect 2021

materials can be captured for appropriate end-of -life treatment, which will reduce the potential for harmful impacts on natural capital.

Furthermore, waste disposal can have negative social externalities for nearby households, such as noise, dust, odours, visual intrusion, flies, and vermin[281]. Traffic to and from landfill sites can generate noise, traffic congestion and localised air pollution[282]. These effects can undermine public enjoyment of an area, generate adverse health impacts, and reduce the value of the surrounding area. Reducing the volume of WEEE sent to landfill will reduce these negative social externalities.

Fly-tipping

Similarly, when WEEE is fly tipped, hazardous materials from WEEE can cause soil pollution which can contaminate crops, livestock, and wildlife, and result in leaching, causing ground water pollution[283]. Therefore fly-tipping can have adverse effects on natural capital, which is a negative externality. Through the proposed reforms, less WEEE will be fly tipped, reducing the harmful impacts on natural capital.

Energy from waste

When WEEE is sent for incineration for energy from waste, it usually burns material under pressure in a closed, controlled system, which removes some emissions and filters out pollutants[284]. However, a small volume of toxic fumes and pollutants can still be emitted from the controlled systems, polluting the air, which can directly affect the health of living organisms. Incineration also releases carbon dioxide, which is accounted for in the cost-benefit analysis. People living near incinerators often face noise, litter, increased vehicle traffic, smells and air pollution resulting from the increased traffic to the site. The reduced demand for incineration as a result of the reforms will reduce the negative externalities associated with incineration and increase natural capital.

Material extraction and EEE production

When WEEE is not reused or recycled there is value lost from the loss of critical materials that compose WEEE. The materials that compose EEE, shown in table 12, are finite resources and depleting these critical finite resources is unsustainable. The reforms will allow for the recovery of valuable metals and hence increase the stock of natural capital.

As well as the recovery of valuable materials, the reduced reliance on raw material extraction and EEE production as a result of the reforms will reduce the negative externalities associated with extraction and production[285]. Mining of raw materials involves toxic substances, such as sulfuric acid, to separate and process the mineral from the ore[286]. This can cause environmental degradation of nearby soil as toxic substances poison the top layers of the soil. Processing of raw materials and production of EEE is energy intensive, releasing greenhouse gases[287]. Raw material extraction and processing can result in pollution to the air and water, deforestation, and the creation of waste. Therefore, reducing the demand for raw material extraction and EEE production will decrease negative externalities associated with them.

[281] Valuation of externalities of selected waste management alternatives: A comparative review and analysis - ScienceDirect
[282] Ibid.
[283] Evidence Review of Flytipping Behaviour.pdf (zerowastescotland.org.uk)
[284] Energy from waste: a guide to the debate (publishing.service.gov.uk)
[285] metals_environmental_risks_report_english.pdf
[286] Mineral Extraction - an overview | ScienceDirect Topics
[287] Increased carbon footprint of materials production driven by rise in investments | Nature Geoscience

9.3 Consumer costs

The policy options outlined in this impact assessment will place greater responsibility on producers and retailers of EEE products to pay for the collection and treatment/disposal costs associated with these products. As such, these businesses will face additional costs compared to the baseline scenario. EEE producers and retailers may decide to pass some, or all, of these additional costs onto consumers in the form of higher prices for EEE products. This section explores the extent to which cost pass through may occur.

Consumer Impacts: Cost-pass through assumptions associated with the disposal of SMW

EEE is not one homogenous category of products, and therefore an attempt has been made to determine whether cost pass through pressures differ across EEE categories. Due to limitations in currently available data, EEE has been disaggregated into two categories for this analysis: small mixed WEEE (SMW) and bulky WEEE. This is also in line with the policy options considered, which include policies to increase collections of each of these categories separately.

There is no specific evidence on pass through rates for SMW and so a theory-based assessment has been made. The extent to which producers can pass on costs to consumers is likely to be related to the relative elasticity of demand of products. There is insufficient research to determine the degree of price elasticity for SMW products, however, SMW comprises of 9 EEE categories, and within each of those categories exists significant homogeneity across products. This means that consumers can switch to a similar product in the same category if the cost of an individual item increases. Similarly, as some of these goods are not deemed necessities, consumers could choose not to buy the product at all. This may lead to individual producers having limited power to increase prices in the event of an increase in their costs.

However, it could be argued that regulatory reforms are more in line with an industry wide shock than a shock to individual businesses. The Office of Fair Trading (OFT) suggests that when there are industry wide shocks there is usually some form of cost pass through in the form of price rises[288]. They show that cost pass through is likely to be between two extremes of 50% under an industry with a monopoly and 100% under a perfect competitive market. The EEE industry is likely to be neither a monopoly or pure competition and the true pass through is therefore likely to be somewhere between these two extremes.

Table 79: Scenario of percentage of increase in cost which could be passed through to consumers

Low scenario (Pure Monopoly)	High Scenario (Perfect Competition)
50%	100%

Consumer Impacts: Cost-pass through assumptions associated with the disposal of bulky WEEE

There is some existing evidence on the elasticity of demand for bulky EEE products (category 1,11,12). Dale, L. & Fujita, S., estimate that the average price elasticity of demand for a combination of electrical appliances (larger bulky electrical appliances and white goods) is low at -0.35[289]. This relatively inelastic price elasticity of demand has led us to assume that producers are able to pass through 65% of costs to consumers (in the form of price rises of new bulky electrical items), with producers bearing 35% of the costs associated with the collection and

[288] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/320912/Cost_Pass-Through_Report.pdf
[289] Dale, L. & Fujita, S. (2008), "*An Analysis of the Price Elasticity of Demand for Household Appliances";* University of California Berkeley, (February 2008).

treatment of bulky WEEE. This is also within the range of cost pass through scenarios put forward by the OFT for an industry wide shock

Final cost pass through assumptions for SMW and bulky EEE

For consistency and with the absence of any more data we will adopt an identical cost pass through percentage associated with the costs of collecting SMW. This use of 65% cost pass through across all types of WEEE is supported by the analysis within OFT's report on cost pass through as it sits within the range of cost pass through of 50%-100%.

Table 80: Cost pass through adopted proportion.

Low scenario (Pure Monopoly)	Central Scenario (for bulky and SMW)	High Scenario (Perfect Competition)
50%	65%	100%

How policy proposals will impact different groups of households/consumers

Although consumers may face increased prices for EEE products, some households will make direct savings where they previously paid for service which will be provided to them for free under the reforms. For simplicity, we have split households into two separate consumer groups to assess this.

Both on-demand collection of bulky WEEE (usually collected by LAs) and 1:1 retailer collections from the home are existing services which are generally offered at a fee to households. It is proposed that businesses will pay for these services under options 3 and 4 respectively, effectively transferring the costs previously paid directly by households onto businesses. As such households that pre-policy implementation would have paid to have their WEEE collected are now benefitting from no longer having to pay for this service. For the purpose of this analysis this group of households are labelled as consumer group 1. Consumer group 2 are the remaining households who purchase new electrical products but would not have used either of these services before the reforms.[290]

Although some LAs currently provide household SMW collections similar to those expected to be provided by producers under option 2, these are currently funded by LAs rather than directly by households. For simplicity, we therefore assume there will be no direct savings to households under option 2, whilst acknowledging that any transfer in costs from LAs to producers will be an indirect benefit to council tax paying households.

The direct savings to consumer group 1 were estimated in the cost benefit analysis section and are presented in table 81.

Table 81: Total gross savings to consumer group 1 from no longer paying for bulky WEEE collections (£2019m).

	2025	2029	2034	Total (10-year appraisal period)
On demand bulky WEEE collections (option 3)	11.4m	12.9m	£14.9m	131.0m

[290] These households either purchase a new electrical item without disposing of an old one (does not mean that they hoard the old bulky WEEE item; it is assumed that no hoarding takes place when it involves bulky WEEE) or use alternative disposal methods such as fly-tipping, taking their WEEE to a HWRC or in-store collections when purchasing a replacement item (under the current 1:1 policy requirement for in-store take-back).

Free retailer 1:1 collections (option 4)	45.2m	50.8m	58.9m	517.8m

These are gross savings to consumer group 1 as a result of no longer paying for bulky WEEE services. Consumer group 1 could still face higher prices for EEE products should producers pass on these costs. This is because producers can't discriminate between different groups of consumers when setting prices and any increase in prices for EEE products will impact all households purchasing new EEE (whether in consumer group 1 or 2). As we assume no direct savings to households as a result of option 2, all consumer purchasing small WEEE products will experience a net cost as a result of this options (assuming producers pass on some of their costs through higher prices).

The total costs to producers and retailers resulting from SMW household collection, on-demand collections and free 1:1 retailer collections were estimated in the cost benefit analysis section and are presented in table 82.

Table 82: Total costs to business (£2019m)

	2025	**2029**	**2034**	**Total (10-year appraisal period)**
SMW household collection	£61.6m	£25.9m	£28.0m	£297.9m
Total cost to producers (on-demand collection)	£31.8m	£37.5m	£43.1m	£378.9m
Total costs to retailers (free 1:1 retailer collections)	£29.2m	£36.0m	£41.7m	£362.5m

As discussed, it is assumed that 65% of these costs are passed on to consumers. The total cost that producers will pass through to households through higher prices as a result of each option are presented in table 83 below.

Table 83: Total costs passed through to households in the form of price rises when purchasing new EEE (£2019m).

	2025	**2029**	**2034**	**Total (10-year appraisal period)**
SMW Household collection	£40.0m	£16.9m	£18.2m	£193.7m
Total cost to households (on-demand collection)	£20.7m	£24.4m	£28.0m	£246.3m
Total costs to households (free 1:1 retailer collections)	£19.0m	£23.4m	£27.1m	£235.6m

The following method was used to estimate the split of cost pass through between consumer groups 1 and 2[291]. It is assumed that the tonnage of waste collected from consumer group 1 is equivalent to the amount of WEEE they purchase, i.e., that consumer group 1 are disposing of WEEE due to purchasing a replacement. This is a simplifying assumption but matches assumptions used previously in the analysis (as has been discussed in previous sections, it has

[291] Note: This cost pass through split between consumer group 1 and 2 will only apply to costs from option 3 and 4. As was previously reported, as option 2 proposes a completely knew SMW household collection there would be no savings to households as the new collection system would only require households to move electrical items away from residual waste streams towards separate dry recycling streams.

been assumed that there is no hoarding of bulky WEEE in the waste system[292]). This would suggest that the remaining tonnage of relevant WEEE POM is that purchased by consumer group 2.

For option 3 costs we use categories 1,2,11,12. It is worth noting that that this POM figure includes category 2 (Small Domestic Appliances; microwaves, hoovers, etc). This is because a small amount of SDA is collected through the bulky WEEE collection service. We are however only using this POM tonnage to create an estimate of the split of the cost's producers will pass through to consumers. The actual costs accounted for in the cost pass through calculations will only be the costs associated with collecting bulky WEEE (category 1,11,12). To provide a consistent level of tonnage that is comparable with the baseline tonnage (attributable to consumer group 1) we have used 2018/19 place of market data[293].

For option 4 we only use POM data for category 1,11 and 12. This is to remain consistent with the baseline tonnage collected under regulation 43 which is assumed to only include tonnage from category 1,11 and 12. Again, this does also include a small amount of SMW, however given the reasons stated in the previous this is seen as reasonable. The POM data used is also 2019 data only. This is again to create a comparable data set with the baseline tonnage collected under regulation 43 which is also for the year 2019 only.

Table 84: Estimate of proportion of relevant EEE producers purchased by each consumer group

	Option 3	**Option 4**
Tonnes collected from consumer group 1 (baseline)	64,719	116,886
Total POM (of relevant categories) minus baseline collected tonnage	1,060,676	981,941
Consumer group 1 proportion	6%	12%
Consumer group 2 proportion	94%	88%

Note: Option 3 POM tonnes includes SMW as in the baseline there is a small proportion of SMW which is being collected.

The total costs and benefits to each consumer group for each option are presented in table 83. This shows that consumer group 1 will experience net gains as a result of options 3 and 4, whereas consumer groups 2 will experience a net cost as a result of all options. Across all three policies there is estimated to be a net cost to households of just under £27m annually, or £0.95 per household per year[294]. This does not include savings to the taxpayer, increased convenience (and lower transport costs) to households or wider gains to society through reduced environmental disbenefits and fly-tipping disamenity.

We are not aware of any specific differences in the profile of consumers in group 1 and 2. Further work will be conducted for the final impact assessment on whether this causes any adverse distributional impacts.

Table 85: Estimate of proportion of relevant EEE producers purchased by each consumer group for each option (£2019m).

[292] Discussion with consultants Anthesis stated that it would be unlikely bulky WEEE would be hoarded because of the size it can take up in the household. Either the item is kept as an additional unit (e.g. an extra fridge) or the household will dispose of the item of WEEE. There is an appreciation that there might be anecdotal examples of where a household does hoard an item of WEEE.

[293] Data provided by Anthesis in the Evidence Gaps research.

[294] Based on 28.1m UK households: https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2021

		Consumer group 1	Consumer group 2	Total (all consumer groups)
Option 2	Savings compared baseline	£0m	£0m	£0
	Additional costs from cost pass through	£0m	£193.7m	£193.7m
	Net cost/benefit	£0m	-£193.7m	-£193.7m
Option 3	Savings compared baseline	£131.0m	£0m	£131.0
	Additional costs from cost pass through	£15.0m	£231.2m	£246.3m
	Net cost/benefit	+£115.9m	-£231.2m	-£115.3m
Option 4	Savings compared baseline	£517.8m	£0m	£517.8m
	Additional costs from cost pass through	£28.0m	£207.6m	£235.6m
	Net cost/benefit	+£489.7m	-£207.6m	£282.2m
All options combined	Savings compared baseline	£648.8m	£0m	£648.8m
	Additional costs from cost pass through	£43.1m	£632.5	£675.5m
	Net cost/benefit	£605.7m	-£632.5m	-£26.8m

Note: Some rows or columns don't sum due to rounding.

9.4 Consumer experience

Currently, of those who have recycled their WEEE in the last 12 months the majority did so by taking the item to a HWRC[295]; 27% of respondents saying they have disposed of WEEE in this way in the last 12 months and 22% having taken to a recycling bank for electricals.

Increasing the availability and understanding of household collection options will impact households' time and effort spent recycling their items. These savings have not been monetised

[295] In response to being asked what their household has done with WEEE in the last 12 months: 27% taken to tip/HWRC, 22% taken to recycling bank for electrical items, 10% sold or given away, 7% took/sent it back to the retailer or manufacturer to be recycled, 4% repaired, 43% put in general rubbish, 22% hoarded, 15% put in kerbside recycling. WEEE-public-attitudes-and-behaviours-original.pdf

but would encapsulate time, effort, fuel, and other impacts if a household is able to have their items collected from the home rather than transporting these themselves. In larger items of WEEE there are also risks to households attempting to move heavy items which could cause injuries. Having a household collection would reduce the need for households to move large items themselves, a benefit in particular for the elderly and vulnerable.

9.5 Health and safety

In addition to householders moving heavy items, there are risks across the disposal route if WEEE is disposed of incorrectly. Many items of WEEE involve glass and metals which can be delicate and sharp when broken. Reducing WEEE which is incorrectly placed in residual and mixed-recycling collections reduces the risk of injury to those working in these areas, who could be injured by broken glass for when sorting recycling for example.

9.6 Quality of recyclate

The suggested WEEE policies would provide a disposal route which will be purely for WEEE. One of the current routes of disposal is to take WEEE to HWRCs where there can be issues with contamination if incorrect items are placed in WEEE specific bins. Contamination rates for SMW at HWRCs is 4.9% and for large appliances this is less than 1%[296]. Although not quantified in this impact assessment, increasing the quantity of WEEE which is recycled through uncontaminated routes could improve the quality of the recyclate and have an impact on increasing the price of this material too as higher quality material warrants higher prices.

9.7 Recycling and secondary materials market

Increasing the tonnages of recycling may impact the secondary materials market. Having an increase of materials could lead to economies of scale efficiencies as more material is being processed.

The extent to which capacity exists for additional recycling of WEEE (and the cost of creating additional capacity) because of these policies will be explored further for the final impact assessment.

9.8 Equality Impact Assessment

DEFRA currently do not have an understanding of the proportional impacts that introducing these policy options would have on various groups in society. It's important to consider how different groups of consumers will be impacted in different ways. For example, older or disabled individuals may face more difficulties returning items to a store than others. It is felt that the combination of the variety of policy options should ensure there's accessible options for all needs by furthering at home collections reducing the need for vulnerable individuals to move their WEEE themselves who would find it difficult to utilise the current systems. The equality impact will be further considered in later stages of the impact assessment.

9.9 Jobs

Circular economy policies (such as those encouraging increased recycling and reuse) have been shown to have the potential to create (hundreds of) thousands of new jobs[297]. Due to the nature of these jobs, they are also likely to be distributed across the country, contributing to levelling up.

[296] Waste electrical and electronic equipment (WEEE): evidence and national protocols guidance - GOV.UK (www.gov.uk)
[297] https://green-alliance.org.uk/publication/levelling-up-through-circular-economy-jobs/

9.10 Trade

Under the current regulations a business is classed as an EEE producer if they:

- manufacture and sell EEE under their own brand in the UK
- resell equipment made by someone else under their own brand (if the maker's brand appears on the equipment, they are the producer)
- import EEE on a commercial basis into the UK
- are established outside of the UK and supply EEE directly to the UK market by distance selling (for example online, mail order, by phone)

The regulations are therefore designed to capture all producers placing EEE onto the UK market, and aim to apply equally across all obligated producers, whether domestic or based overseas.

The Post Implementation Review of the 2013 WEEE regulations found evidence of high levels of non-compliance with producer obligations from online sellers, particularly overseas sellers selling through online marketplaces (OMPs). Where overseas sellers can free ride their obligations, they gain an advantage over domestic sellers.

The consultation therefore proposes to make OMPs a new category of producer. OMPs would stand in the shoes of overseas seller on their platform and be obligated to register with a Producer Compliance Scheme and submit the same data as other producers. OMPs would then be able to take action to recover these costs from their sellers. This aims to correct a distortion in trade whereby certain overseas sellers can gain an advantage by free riding their obligations and ensure that all producers placing EEE on the UK market face the same obligations.

9.11 Competition

The Competition and Markets Authority (CMA) provide guidelines to policymakers to identify how new policies might affect competition in markets. The CMA asserts that "healthy competition between firms in a market can deliver benefits to consumers through lower prices, more choice and innovation and can help increase productivity and growth"[298]. This section follows the guidance of the CMA conducts a competition assessment, answering the competition checklist questions they provide. This is an initial assessment and will be developed further for the final impact assessment through engagement with stakeholders using the consultation process.

Will the measure directly or indirectly limit the number or range of suppliers?

The measures will not directly limit the number of suppliers. However, higher costs faced by businesses can indirectly limit the number of suppliers. The proposed reforms will be financed by producers, which will face £66.0 million of costs on average annually, to finance SMW and bulky WEEE collections[299]. Annually, retailers will face £71.4 million of costs because of the amended takeback regulations[300]. As analysed in section 9.3, producers and retailers may decide to pass some, or all, or these additional costs onto consumers in the form of higher prices for EEE products. Raising costs can result in firms leaving the market, subsequently enhancing the market power for the firms that remain, which would translate into a reduction in the variety of products available for consumers.

However, we expect the annual average costs to businesses to be relatively low which should minimise the risk of this occurring. Table 86, for example, shows that annual costs to producers as a percentage of average annual turnover under the preferred policy is estimated to be less

[298] Competition impact assessment - Part 2: guidelines (publishing.service.gov.uk), pg. 2
[299] Costs to producers include SMW operational costs (crew costs, vehicle retrofitting costs, flat container replacement costs, local and commercial overheads) additional fuel costs, communication costs, Scheme Administrator operational costs, treatment costs, cost of collection (baseline – transfer from LAs and consumers), costs of collection (extended service).
[300] Costs to retailers include handling and collection costs, and loss of revenue.

than 1%. Therefore, the costs of the policy should not cause a significant reduction in the number of producers able to operate.

Table 86: Cost of preferred option to producers compared to average annual turnover

	Number of. Producers	Average Annual Turnover	Annual Costs of Preferred Option	Average Annual Cost per Producer	% Of Turnover
Producers of EEE	3,300[301]	£2.1m[302]	£66.0m	£0.02m	0.95%

Using the annual costs under the preferred option, we allocated these between the costs to retailers (of handling and collection costs and loss of revenue) and to producers (to pay for SMW and bulky WEEE collection services). These costs were then divided by the number of businesses to calculate the average cost per business per year, which was divided by the average turnover to estimate what percentage of the turnover these costs were.

Will the measure limit the ability of suppliers to compete?

No, the preferred policy option should increase the ability of suppliers to compete by creating a level playing field. By designating OMPs as a new class of producers, there will be a redistribution of household collection costs so that they are spread across producers in a more equitable way. Therefore, there will be reduced opportunities for producers to free ride. By removing the free rider problem, it will increase the ability of producers, particularly UK producers to compete with overseas sellers.

Will the measures increase incentives to collude?

The preferred policy options will not directly increase incentives for businesses to collude. However, if higher costs cause businesses to exit the market, a reduction in the number of businesses in the market may increase the risk of collusive behaviour amongst the remaining businesses. As outlined earlier in this section, additional costs to businesses are expected to be low and the risk of this occurring minimal.

Will the measures limit the choices and information available to consumers?

The measures will not directly limit the choices and information available to consumers, instead the communication campaigns will increase the information available to consumers. If customers have more knowledge about how to recycle WEEE, they may be able to make more informed decisions when purchasing electricals. However, if the increased costs faced by businesses causes some businesses to leave the electricals market, consumers may face reduced choices. Again, as costs to businesses are relatively low, the risk of this occurring is minimal.

Section 10: Monitoring and Evaluation

10.1 Current monitoring arrangements

Monitoring change is focused on our intended outcomes, namely reductions in waste production, resource use and improvements in waste management (more recycling, less landfilling, and less waste crime). The changes are part of a ‘golden thread’ which leads upwards to the objectives of

[301] Number of registered WEEE producers identified as B2C or both in the NPWD in 2022 (https://www.gov.uk/government/publications/waste-electrical-and-electronic-equipment-weee-public-registers)

[302] Average turnover of businesses in SIC 26 (Manufacture of computer, electronic and optical products) and 27 (Manufacture of electrical equipment) in 2022 (https://www.gov.uk/government/collections/business-population-estimates)

the 25 Year Environment Plan[303], the Clean Growth Strategy[304], and the Litter Strategy[305]. The framework of indicators is set out on page 139 of the Resources and Waste Strategy[306] and shown below in figure 3, for ease of reference.

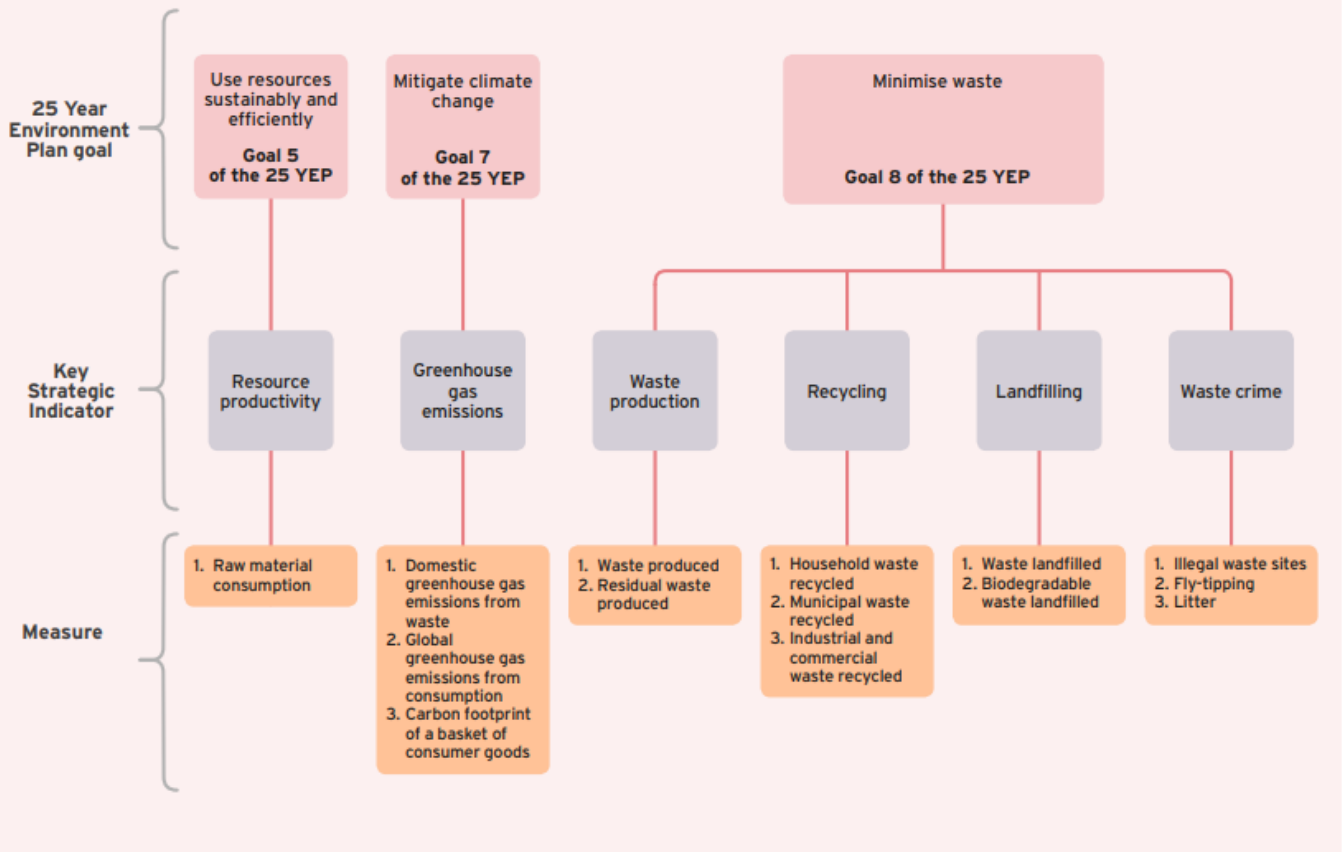

Figure 3: Indicator Framework for Monitoring the Resource and Waste Strategy

The framework was devised prior to the focus on Net Zero, to which all three 25 Year Environment Plan goals are relevant. We have set out our approach to monitoring change in our Monitoring Progress report (available here)[307].

10.2 Current data collection regime

Under the current WEEE producer responsibility system, Defra sets household collection targets for each category of WEEE, and these are apportioned out to Producer Compliance Schemes on a market share basis. As a result, the environmental performance of the system tends to be measured by the extent to which these targets are met and/or whether they have been exceeded. While the consultation does not propose to change this approach, at least in the short term, it has been identified that collection targets may not be the most accurate reflection of how well the system is performing, particularly as the amount of EEE being placed on the market does not always directly correlate to the amount of WEEE being generated.

10.3 Evaluation

Defra made a commitment in the Resources & Waste Strategy that "all significant policies, programmes and projects should be subject to comprehensive but proportionate evaluation" (page 143)[308]. In 2020, we published the Evaluation Plan[309]. Since then we have commissioned

[303] 25 Year Environment Plan - GOV.UK (www.gov.uk)
[304] Clean Growth Strategy - GOV.UK (www.gov.uk)
[305] Litter Strategy for England - GOV.UK (www.gov.uk)
[306] Resources and waste strategy for England - GOV.UK (www.gov.uk)
[307] Resources and Waste Strategy - Monitoring Progress (publishing.service.gov.uk)
[308] Resources and waste strategy for England - GOV.UK (www.gov.uk)
[309] Resources and waste strategy for England: monitoring and evaluation - GOV.UK (www.gov.uk)

the evaluation and published the Programme of Work for 2022/2023 which provides further information on the evaluation approach[310].

The evaluation programme will deploy three types of evaluation – process, impact, and value-for-money. Each is outlined below.

10.3.1 Process evaluation

Reforming the WEEE regulations will be subject to process evaluation. This will check progress as the policy rolls out, enabling us to adjust, where we can, to increase effectiveness, efficiency, and equity of impact. The process evaluations will primarily be based on qualitative interview data with Defra and other stakeholders, and programme documentation and reporting information. It will assess the extent to which progress is being made as intended, why and for whom; summarise the early benefits and disbenefits; and make recommendations for adjustments. Each process evaluation will start six months prior to policy go-live date and be complete 12 months after the go-live date.

10.3.2 Impact evaluation

The impact evaluation will take the monitoring data on amounts of residual waste arising and answer the question, "to what extent, how, for whom and in what circumstances, have the policies in the Resources and Waste Strategy (including the reforms to the WEEE regulations) contributed to the observed outcome?". Recognising the complexity of the context and the interacting nature of the policies, we will take a theory-based approach. Data sources will include available monitoring and datasets, qualitative interviews with Defra colleagues and four online surveys among local authorities, businesses, waste sector businesses and citizens[311].

Six outcomes will be assessed:

1. More products are regularly retained, reused, repurposed, refurbished, or remanufactured.
2. Recycling rates for households, businesses, municipal waste increase.
3. Household, municipal and business waste streams improve in quality.
4. Plastics waste is prevented at all stages of the plastics life cycle.
5. Waste crime reduces.
6. Food Waste is near eliminated from landfill .

Reforming the WEEE regulations will be considered and evaluated under the first, second, third and fifth outcomes[312].

10.3.3 Value for money (economic) evaluation

A cost-benefit analysis will be carried out for the Strategy, using the quantified attribution of impact and data to be collected by the contractor on costs of taking action. Impacts will be monetised in accordance with best practice and will draw on official Government guidance, published impact assessments and the knowledge of Defra's team of resources and waste economists. It will involve making estimates of costs and monetising direct and consequential benefits. The analysis will produce estimates of uncertainty, using sensitivity analysis and qualitative ratings where quantitative measures are unavailable. Results will be reported as cost benefit ratios which demonstrate the scale of return (or otherwise) on public investment. The evaluation budget for the Resources & Waste Strategy evaluation is £2.5 million for 2022 - 2027, with £300,000 committed for FY23/24.

[310] Resources and Waste Strategy - Monitoring Progress - November 2022 (publishing.service.gov.uk)

[311] These surveys will aim to understand the impact of the Resources and Waste Strategy on citizens and businesses, including understanding any behaviour changes resulting from the policies.

[312] Collecting data to inform lessons learnt will be embedded in the evaluation process.

10.4 Proposed monitoring arrangements

As part of the evaluation, a list of indicators of change based on the Theories of Change for the Strategy, outcomes and policies will be developed. This will include measurable, meaningful, and manageable indicators of outcomes (or proxy indicators) and impacts. A Monitoring Data Collection Plan will be produced in 2023 outlining available data sources and new approaches to gathering necessary data (what, how and how frequently). This will feed into the existing Monitoring Progress report for the Resource & Waste Strategy and baseline data will be collected in 2023. Monitoring data will be reported (approximately) annually in the Monitoring Progress publication.

Proposed indicators under development may include:

- Consumer awareness and ease of recycling electricals, preferred channel for recycling electricals.
- Perceived importance of the circularity of EEE.
- Amount of donated, reused, hoarded, repaired, recycled, and disposed of electricals (in items and tonnes).
- Growth in the number of companies, profits, and employment recycling/repairing electricals.
- Share of new electrical products launched that are repairable.
- Percentage of households that purchase second hand EEE.
- Share of EEE in residual waste.

Material Focus[313] are currently carrying out an independent assessment to consider whether weight-based targets remain the best approach to drive performance or whether other metrics and outcomes should be pursued instead, and the potential costs/benefits of these approaches. We will also use the consultation to gather views on alternative measures which could be used in the future to measure the performance of the system. These could be metrics which measure the impact of new policies aimed at reducing the amount of WEEE going to landfill or a potential appraisal of the carbon impact of the system.

10.5 External influencing factors

The context within which the proposed WEEE regulations will be implemented is extremely complex, with many interacting parts, policies, and actors.

Key factors which may influence the outcome of the WEEE regulations, which are not under our control, include:

- How producers decide to implement household WEEE collections.
- The extent to which householders respond positively to messaging on recycling and reuse of WEEE.
- Technical advances in product design and consumer demand for new technology which could impact on future WEEE arisings.
- Changes to future consumption arising from changes to economic conditions.
- Technological advances that impact collection systems and costs of treatment.

[313] https://www.materialfocus.org.uk/

Annex A: Full cost benefit analysis profile for the appraisal period

Option 2

Table A.1: Full costs and benefits for Option 2 (undiscounted £2019)

2019 £s		2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	*Total*
Set up costs	Set up costs - containers	13,703,979	-	-	-	-	-	-	-	-	-	***13,703,979***
	Scheme Administrator Set up costs	393,900	-	-	-	-	-	-	-	-	-	***393,900***
	Staff training and familiarisation	50,967	50,967	-	-	-	-	-	-	-	-	***101,933***
Operational costs	Crew costs	3,804,177	3,804,177	3,804,177	3,804,177	3,804,177	3,804,177	3,804,177	3,804,177	3,804,177	3,804,177	***38,041,772***
	Vehicle retrofitting costs	1,800,336	1,800,336	1,800,336	1,800,336	1,800,336	1,800,336	1,800,336	1,800,336	1,800,336	1,800,336	***18,003,365***
	Flat container replacement costs	680,564	680,564	680,564	680,564	680,564	680,564	680,564	680,564	680,564	680,564	***6,805,640***
	Cost of additional fuel attributed to SMW collections	85,760	85,760	85,760	85,760	85,760	85,760	85,760	85,760	85,760	85,760	***857,604***
	Local and commercial overheads	637,084	637,084	637,084	637,084	637,084	637,084	637,084	637,084	637,084	637,084	***6,370,838***
	Communication costs	39,931,718	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	***170,685,586***
	Scheme Administrator operational costs	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	***44,888,313***
	Additional carbon from transport	42,907	43,567	44,227	44,887	45,547	46,207	47,033	47,693	48,353	49,178	***459,599***

	Treatment costs	873,491	1,683,741	3,428,117	3,884,065	4,400,647	4,985,913	5,520,663	5,913,753	6,243,449	6,430,796	***43,364,637***
	Landfill tax loss (HMT)	312,326	601,905	1,225,552	1,388,611	1,573,230	1,782,513	1,973,708	2,114,204	2,232,046	2,299,005	***15,503,100***
Benefits	Net carbon reduction from improved treatment	3,491,799	6,834,136	14,125,508	16,242,908	18,673,977	21,464,335	24,190,797	26,276,683	28,125,801	29,463,936	***188,889,879***
	Material revenue from the recycled materials	2,057,241	3,965,418	8,073,812	9,147,538	10,364,231	11,742,721	13,002,134	13,927,784	14,704,376	15,145,508	**102,130,763**
	Landfill tax saving (LA/waste collector)	312,326	601,905	1,225,552	1,388,611	1,573,230	1,782,513	1,973,708	2,114,204	2,232,046	2,299,005	***15,503,100***
	Landfill and EfW Gate Fee Savings	827,336	1,594,600	3,246,765	3,678,549	4,167,848	4,722,115	5,228,652	5,600,879	5,913,152	6,090,507	***41,070,403***
Total costs		**359,180,367**										
Total benefits		**347,594,171**										

Option 3

Table A.2: Full costs and benefits for Option 3 (undiscounted £2019)

2019 £s		2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Total
Set up costs	SMW kerbside containers	13,703,979	-	-	-	-	-	-	-	-	-	***13,703,979***
	Scheme Administrator Set Up costs	393,900	-	-	-	-	-	-	-	-	-	***393,900***
	Staff training and familiarisation	50,967	50,967	-	-	-	-	-	-	-	-	***101,933***
Operational costs	Scheme Administrator operational costs	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	***44,888,313***
	SMW operational costs (crew, retrofitting,	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	***69,221,615***

	replacement containers, overheads)											
	Costs of collection (baseline - transfer)	11,424,307	11,767,036	12,120,047	12,483,649	12,858,158	13,243,903	13,641,220	14,050,457	14,471,970	14,906,129	***130,966,877***
	Costs of collection (extended service)	17,136,460	17,650,554	18,180,071	18,725,473	19,287,237	19,865,854	20,461,830	21,075,685	21,707,955	22,359,194	***196,450,315***
	Fuel costs	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	***23,993,581***
	Carbon from additional fuel	1,182,145	1,200,332	1,218,519	1,236,706	1,254,893	1,273,080	1,295,813	1,314,000	1,332,187	1,354,921	***12,662,596***
	Communication costs	39,931,718	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	**170,685,586**
	Treatment costs	1,768,439	3,527,333	6,305,238	6,847,500	7,452,985	8,129,821	8,758,888	9,249,125	9,678,882	9,969,291	***71,687,502***
	Landfill tax loss	855,823	1,721,510	2,972,814	3,188,292	3,426,901	3,691,794	3,940,268	4,139,761	4,318,369	4,447,918	***32,703,450***
Benefits	Fly-tipping collection cost savings	162,703	167,584	172,612	177,790	183,124	188,618	194,276	200,105	206,108	212,291	***1,865,211***
	Fly-tipping reduction in disamenity	6,482,482	6,676,956	6,877,265	7,083,583	7,296,090	7,514,973	7,740,422	7,972,635	8,211,814	8,458,169	***74,314,390***
	Carbon savings from change in flows	8,240,862	16,767,714	29,862,795	32,694,246	35,868,044	39,430,890	43,026,804	45,950,066	48,669,850	50,985,406	**351,496,676**
	Material Revenue	4,543,831	9,087,794	16,067,822	17,381,368	18,845,076	20,477,992	21,999,463	23,195,033	24,249,642	24,977,132	**180,825,153**
	Consumer group 1 no longer paying for Bulky collection	11,424,307	11,767,036	12,120,047	12,483,649	12,858,158	13,243,903	13,641,220	14,050,457	14,471,970	14,906,129	***130,966,877***
	Landfill tax saving (LA/waste collector)	855,823	1,721,510	2,972,814	3,188,292	3,426,901	3,691,794	3,940,268	4,139,761	4,318,369	4,447,918	***32,703,450***
	Landfill and EfW Gate Fee Savings	2,267,144	4,560,604	7,875,529	8,446,176	9,078,504	9,780,090	10,438,367	10,966,885	11,440,138	11,783,303	***86,636,739***
Total costs	**767,459,747**											
Total benefits	**858,808,522**											

Option 4

Table A.3: Full costs and benefits for Option 4/5/6 (undiscounted £2019)

2019 £s		2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	Total
Set up costs	SMW kerbside containers	13,703,979	-	-	-	-	-	-	-	-	-	***13,703,979***
	Scheme Administrator Set Up costs	393,900	-	-	-	-	-	-	-	-	-	***393,900***
	Staff training and familiarisation	50,967	50,967	-	-	-	-	-	-	-	-	***101,933***
Operational costs	Scheme Administrator operational costs	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	4,488,831	***44,888,313***
	SMW operational costs (crew, retrofitting, replacement containers, overheads)	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	6,922,162	***69,221,615***
	Costs of collection (baseline - transfer)	11,424,307	11,767,036	12,120,047	12,483,649	12,858,158	13,243,903	13,641,220	14,050,457	14,471,970	14,906,129	***130,966,877***
	Costs of collection (extended service)	17,136,460	17,650,554	18,180,071	18,725,473	19,287,237	19,865,854	20,461,830	21,075,685	21,707,955	22,359,194	***196,450,315***
	Fuel costs	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	2,399,358	***23,993,581***
	Retail handling and collection Costs	27,778,484	28,611,838	29,470,193	30,354,299	31,264,928	32,202,876	33,168,962	34,164,031	35,188,952	36,244,620	***318,449,183***
	Carbon from additional fuel	1,182,714	1,200,927	1,219,141	1,237,356	1,255,572	1,273,789	1,296,557	1,314,777	1,332,998	1,355,770	***12,669,601***
	Communication costs	39,931,718	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	14,528,208	***170,685,586***
	Treatment Costs	3,160,134	6,394,226	10,779,328	11,455,812	12,199,547	13,018,780	13,794,516	14,435,822	15,021,180	15,471,858	***115,731,203***
	Retailers' loss of revenue from charging for kerbside takeback	45,167,636	46,522,666	47,918,346	49,355,896	50,836,573	52,361,670	53,932,520	55,550,496	57,217,011	58,933,521	***517,796,333***

	+ collecting baseline tonnage											
	Landfill tax loss	2,385,327	4,872,289	7,889,938	8,252,930	8,643,478	9,064,868	9,474,534	9,840,055	10,189,672	10,495,360	***81,108,452***
Benefits	Fly-tipping collection cost savings	162,703	167,584	172,612	177,790	183,124	188,618	194,276	200,105	206,108	212,291	***1,865,211***
	Fly-tipping reduction in disamenity	6,482,482	6,676,956	6,877,265	7,083,583	7,296,090	7,514,973	7,740,422	7,972,635	8,211,814	8,458,169	***74,314,390***
	Carbon savings from changes in flows	24,481,248	50,737,604	83,679,649	88,952,938	94,666,651	100,871,173	107,440,358	113,227,199	118,924,403	124,582,445	***907,563,668***
	Material revenue	13,910,028	28,382,158	46,178,725	48,395,598	50,789,733	53,380,988	55,889,549	58,101,822	60,203,635	62,009,744	***477,241,981***
	Consumer group 1 Savings	56,591,943	58,289,702	60,038,393	61,839,545	63,694,731	65,605,573	67,573,740	69,600,952	71,688,981	73,839,650	***648,763,210***
	Landfill tax savings	2,385,327	4,872,289	7,889,938	8,252,930	8,643,478	9,064,868	9,474,534	9,840,055	10,189,672	10,495,360	***81,108,452***
	Landfill and EfW Gate Fee Savings	6,319,032	12,907,494	20,901,736	21,863,169	22,898,007	24,014,178	25,099,477	26,067,829	26,994,110	27,803,894	***214,868,926***
Total costs	**1,696,160,971**											
Total benefits	**2,405,725,864**											

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Annex B: Sensitivity analysis

Sensitivity analyses explores how the outcome of the policy scenarios may vary due to uncertainty around key input variables used in our models.

Table B.1 lists all the variables that we use for our combined sensitivity analysis to identify our low and high NPV for each option (also presented in the summary sheets at the beginning of this document). This means that we combine several sensitivities to identify the best and worst outcome; and how these outcomes differ from our central one(s). The low NPV estimates assume low benefits and high costs and the high NPV estimates assume high benefits and low costs.

Table B.1: Summary of sensitivities

Sensitivities	Low NPV: low benefit/ high-cost change from central estimate	High NPV: high benefit/ low-cost change from central estimate
Fly-tipping diversion	5% decrease from 10% to 5%	5% increase from 10% to 15%
Fly-tipping tonnage of WEEE present	The lower bound tonnage	The upper bound tonnage
Fly-tipping disamenity	Fly-tipping incident takes 1 day, rather than 3, to clear	Fly-tipping incident takes 5 days, rather than 3, to clear
Weight of bulky WEEE item	Average weight of bulky WEEE item is 40kg, not 60kg	Average weight of bulky WEEE item is 80kg, not 60kg
Tonnage collected by policy	Decrease by 10%	Increase by 10%

Fly-tipping diversion

It is assumed that the policies will cause a 10% diversion of fly tipped WEEE away from fly-tipping and to the collection methods introduced by the policies as they make recycling WEEE more convenient than fly-tipping it[314]. However, there is uncertainty about how much the policy will cause a diversion away from fly-tipping to the more convenient collections.

Varying the assumption of how much WEEE is diverted from fly-tipping will affect two benefits, the fly-tipping collection costs and the fly-tipping disamenity, as shown in the table below.

Table B.2: Changes in benefits from varying the fly-tipping diversion assumption (2019m)

	Total for Option 4, £ 2019 million		
Cost or benefit affected	**Low benefit:** 5% diversion	**Average benefit:** 10% diversion	**High benefit:** 15% diversion
Fly-tipping collection cost savings	£0.9m	£1.9m	£2.8m
Fly-tipping disamenity	£37.2m	£74.3m	£111.5m

Fly-tipping tonnage of WEEE present

There is uncertainty as to the tonnage of WEEE present in fly-tipping in the system. Changing the tonnage of WEEE present in fly-tipping will change the volume of WEEE that is diverted from fly-tipping. This will then affect the benefits received through fly-tipping collection cost savings and the benefits from reduced disamenity.

Table B.3: Changes in benefits from varying the assumption of WEEE present in fly-tipping tonnage (£2019m)

Total for Option 4, £ 2019 million

[314] Anthesis, Evidence Gaps, page 50

Cost or benefit affected	Low benefit: Lower bound tonnage	Average benefit: Tonnage used in IA NPV	High benefit: Upper bound tonnage
Fly-tipping collection cost savings	£1.0m	£ 1.9m	£2.7m
Fly-tipping disamenity	£39.5m	£74.3m	£109.2m

Fly-tipping disamenity

The number of days that it takes for fly tipped WEEE to be collected will affect the amount of public disamenity experienced. Varying the number of days it takes for WEEE to be collected affects how much benefits are received from avoided disamenity.

Table B.4: Changes in benefits from varying the assumption of how long it takes fly-tipping to clear (£2019m)

	Total for Option 4, £ 2019 million		
Cost or benefit affected	**Low benefit:** 1 day to clear	**Average benefit:** 3 days to clear	**High benefit:** 5 days to clear
Fly-tipping disamenity	£24.8m	£74.3m	£123.8m

Weight of bulky WEEE item

There is some uncertainty related to the weight of an item of bulky WEEE. Since the cost of collection per item is assumed to be fixed, by varying the assumption of the weight of a bulky WEEE item, it will have a number of effects on the costs and benefits of the policy. It will affect the costs of collection of both the baseline and extended service, varying the weight will also affect fuel costs, the carbon from additional fuel and retailers' loss of revenue. It will also change the benefits from reduction in disamenity from fly-tipping and savings to consumer group 1.

Table B.5: Changes in costs and benefits from varying the assumption of the weight of a bulky WEEE item (£2019m).

	Total for Option 4, £ 2019 million		
Cost or benefit affected	**Low:** 40kg	**Average:** 60kg	**High:** 80kg
Costs			
Costs of collection (baseline - transfer)	£196.5m	£131.0m	£98.2m
Costs of collection (extended service)	£294.7m	£196.5m	£147.3m
Fuel costs	£12.7m	£24.0m	£44.9m
Carbon from additional fuel	£6.7m	£12.7m	£23.7m
Retailers' loss of revenue	£776.7m	£517.8m	£388.4m
Benefits			
Fly tipping reduction in disamenity	£111.4m	£74.3m	£55.7m
Savings to consumer group 1	£973.1m	£648.8m	£486.6m

Tonnage collected by policy

There is considerable uncertainty over the tonnages that will be collected and sent to recycling and reuse as a result of the policies. Changing the collection rates resulting from the policy will affect a number of costs and benefits associated with collection and treatment of WEEE.

Changing the tonnage of WEEE collected affects the costs associated with costs of collection, fuel costs, retail handling and collection costs, the costs from carbon associated with fuel, treatment costs and landfill costs. It also affects the benefits from the policy including the carbon savings, material revenue, landfill tax savings and landfill and EfW gate fee savings, as shown below.

Table B.6: Changes in costs and benefits for preferred option from varying the tonnage collected by policy (£2019m).

	Total for Option 4, £ 2019 million		
Cost or benefit affected	**Low:** -10%	**Average:** Tonnage used in IA NPV	**High:** +10%
Cost			
Cost of collection (extended service)	£176.8m	£196.5m	£216.1m
Fuel costs	£23.0m	£24.0m	£24.9m
Retail handling and collection costs	£286.6m	£318.5m	£350.3m
Additional carbon costs	£12.2m	£12.7m	£13.13m
Treatment costs	£104.4m	£115.7m	£127.1m
Landfill tax loss	£73.0m	£81.1m	£89.2m
Benefits			
Carbon Savings	£816.8m	£907.6m	£998.3m
Material Revenue	£429.7m	£477.2m	£524.8m
Landfill tax savings	£73.03m	£81.1m	£89.2m
Landfill and EfW Gate fee savings	£193.4m	£214.9m	£236.4m

High and low estimates

Table B.7: Best Case Scenario - high benefit, low-cost analysis, for Options 2-4, 2019 prices, £m.

	Option 2	Option 3	Option 4
Transition Costs			
SMW Kerbside Containers	13.7	13.7	13.7
Scheme Administrator set up costs	0.4	0.4	0.4
Staff training and familiarisation	0.1	0.1	0.1
Operational Costs			
Crew Costs	32.7	32.7	32.7
Vehicle Retrofitting Costs	15.5	15.5	15.5
Flat Container Replacement Costs	5.9	5.9	5.9
Additional Fuel Costs	0.7	10.9	10.9
Local and Commercial Overheads	5.5	5.5	5.5
Communication Costs	150.5	150.5	150.5
Scheme Administrator Operational Costs	38.6	38.6	38.6
Carbon from Additional Fuel	0.4	5.8	5.8
Treatment Costs	32.3	53.7	87.0
Landfill Tax Loss (HMT)	11.5	24.5	61.2
Cost of Collection (Baseline – Transfer)	-	83.8	83.8
Costs of Collection (Extended Service)	-	127.1	127.1
Retail handling and Collection Costs	-	-	244.6
Retailers Loss of Revenue	-	-	331.5
Benefits			
Carbon Savings	171.1	320.9	833.1

Material Revenue from the Recycled Materials	92.8	165.5	439.6
Landfill Tax Saving (LA/ Waste Collector)	14.1	30.0	74.7
Landfill and EfW Gate Fee Savings	37.3	79.5	198.0
Savings to Consumer Group 1	-	167.7	830.7
Fly-tipping Collection Cost Savings	-	2.6	2.6
Fly-tipping Reduction in Disamenity	-	174.7	174.7
Total Costs	**307.8**	**568.7**	**1214.7**
Total Benefits	**315.4**	**941.0**	**2553.5**
NPSV	**7.6**	**372.3**	**1338.7**

Table B.8: Worst case scenario - low benefit, high-cost, analysis, for the Options 2-4, 2019 prices, £m.

	Option 2	**Option 3**	**Option 4**
Transition Costs			
SMW Kerbside Containers	13.7	13.7	13.7
Scheme Administrator set up costs	0.4	0.4	0.4
Staff training and familiarisation	0.1	0.1	0.1
Operational Costs			
Crew Costs	32.7	32.7	32.7
Vehicle Retrofitting Costs	15.5	15.5	15.5
Flat Container Replacement Costs	5.9	5.9	5.9
Additional Fuel Costs	0.7	38.6	38.6
Local and Commercial Overheads	5.5	5.5	5.5
Communication Costs	150.5	150.5	150.5
Scheme Administrator Operational Costs	38.6	38.6	38.6
Carbon from Additional Fuel	0.4	20.3	20.3
Treatment Costs	32.3	65.6	106.3
Landfill Tax Loss (HMT)	11.5	30.0	74.7
Cost of Collection (Baseline – Transfer)	-	167.7	167.7
Costs of Collection (Extended Service)	-	226.4	226.4
Retail handling and Collection Costs	-	-	299.0
Retailers Loss of Revenue	-	-	663.0
Benefits			
Carbon Savings	140.0	262.6	681.7
Material Revenue from the Recycled Materials	76.0	135.5	359.7
Landfill Tax Saving (LA/ Waste Collector)	11.5	24.5	61.2
Landfill and EfW Gate Fee Savings	30.5	65.0	162.0
Savings to Consumer Group 1	-	83.8	415.3
Fly-tipping Collection Cost Savings	-	0.6	0.6
Fly-tipping Reduction in Disamenity	-	8.4	8.4
Total Costs	**317.5**	**811.5**	**1675.8**
Total Benefits	**258.1**	**580.5**	**1688.9**
NPV	**-59.5**	**-231.0**	**13.1**

Annex C: Waste Data Flow questions used in baseline analysis

Table C.1 lists the questions from Waste Data Flow (WDF)[315] used by Anthesis[316] as part of their baseline analysis (as discussed in section 5.3).

Table C.1: **Waste Data Flow Questions Relevant to WEEE**

				Authority type required to complete the question		
Question type	**Question number**	**Question frequency**	**Question text**	***Unitary Authority***	***Waste Collection Authority***	***Waste Disposal Authority***
Recycling/ reuse tonnages	Q010	Quarterly	Tonnes of material collected through kerbside schemes from household sources by LA or its contractors	Yes	Yes	No
Recycling/ reuse tonnages	Q011	Quarterly	Tonnes of material collected from commercial, industrial, or other non-household sources by LA or its contractors	Yes	Yes	Yes
Recycling/ reuse tonnages	Q014	Quarterly	Tonnes of material collected through kerbside schemes by non-contracted voluntary/community sector household sources	Yes	Yes	No
Recycling/ reuse tonnages	Q016	Quarterly	Tonnes of material collected for recycling/reuse at CA Sites operated by LA or its contractors	Yes	Yes	No
Waste collected for disposal	Q023	Quarterly	Please provide details of other waste collected for disposal. (The destination of the residual is required for authorities in Wales only.)	Yes	Yes	Yes
Waste managem ent	Q100	Quarterly	This question should be used to record waste sent for treatment or disposal. The end of each route must be the point the waste becomes a resource, or landfill. The question can be used for all waste streams, but usage differs by country.	Yes	Yes	Yes

[315] https://www.wastedataflow.org/

[316] Research to identify and address gaps in existing WEEE data relative to the on-going policy review, Anthesis 2022

Department for Environment Food & Rural Affairs

Department of Agriculture, Environment and Rural Affairs
www.daera-ni.gov.uk

Llywodraeth Cymru
Welsh Government

Scottish Government
Riaghaltas na h-Alba

Call for evidence on reforming the producer responsibility system for waste electrical and electronic equipment

Date: 28 December 2023

We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries.

We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.

This publication is available at www.gov.uk/government/publications

Any enquiries regarding this publication should be sent to us at

weee@defra.gov.uk

www.gov.uk/defra

Contents

Purpose of this call for evidence

The purpose of this call for evidence is to gather evidence and views to support reforms to the Waste Electrical and Electronic Equipment Regulations 2013 that go beyond the specific proposals set out in the accompanying consultation and impact assessment that were also published today. The evidence sought here will inform wider policy development intended to support the drive towards a more circular economy and Net Zero commitments by ensuring products are designed and discarded in a way that lowers environmental impacts.

This call for evidence considers areas for reform where currently a lack of evidence precludes detailed policy proposals from being developed. We have set out a number of ideas on which we welcome your views and supporting evidence. Those hypotheses do not represent agreed government policy. Nevertheless, government is committed to developing policy in these areas at the same time as implementing policies set out in the consultation document.

As well as responding to this call for evidence you are also encouraged to respond to the separate consultation document and impact assessment published today. These set out detailed proposals for reforms relating to the provision of a new collection infrastructure for household waste electric and electronic equipment (WEEE) financed by producers of electrical and electronic equipment and strengthen obligations placed on retailers (including online sellers). Finally, it proposes new obligations on online marketplaces and measures designed to ensure importers and manufactures of vapes properly finance recycling costs when they become waste.

The ideas set out in this call for evidence will need further development and consultation before policy proposals can be implemented. This means that not all the reforms will be made at the same time. Indeed, it is envisaged that reforms will be phased starting potentially as early as next year with the consultation document measures on online marketplaces, free collection of large domestic appliances by retailers on delivery of a new item and the introduction of a new electric and electronic equipment (EEE) category for vapes. The start of the rollout of the household collection system is anticipated from 2026, along with the other measures sets out in the consultation document. It is anticipated that policy proposals arising from the call for evidence will be phased in over a longer timeframe.

This is a joint consultation between the UK Government and the devolved administrations. Devolved administrations is a collective term for the Northern Ireland Executive, he Scottish Government and the Welsh Government.

Geographical extent and definitions

Producer responsibility and waste policy are devolved matters. The UK Government (acting for England) and the Devolved Administrations of Northern Ireland, Scotland and Wales have agreed to continue with a UK-wide approach to WEEE Extended Producer Responsibility. Accordingly, this call for evidence is being undertaken jointly by the UK Government, the Scottish Government, the Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland.

In Northern Ireland, the outcome of this call for evidence will inform decisions of an incoming Minister for Agriculture, Environment and Rural Affairs, or in the absence of a minister, those decisions that can be taken under the Northern Ireland (Executive Formation etc) Act 2022.

Where reference is made in this document to the UK Government in relation to matters of devolved policy, it is the UK Government acting for England. This document and descriptions of existing law therefore relate to England, Scotland, Wales and Northern Ireland.

Reference to 'the regulator' or 'regulators' are references to the Environment Agency (EA), the Northern Ireland Environment Agency (NIEA), Natural Resources Wales (NRW) and the Scottish Environment Protection Agency (SEPA) unless stated otherwise.

Reference to 'Local Authorities' includes district councils in Northern Ireland.

Audience

Responses to this call for evidence are welcomed from:

- businesses involved in the design, production and specification of electronic and electrical products
- businesses who manufacture electronic and electrical products and who place these products on the UK market
- retailers, online marketplaces and importers of electronic and electrical products
- electronics Producer Compliance Schemes
- organisations involved in the re-use sector
- organisations involved in the management and recycling of electronic waste including Local Authorities, waste management companies, brokers, dealers, carriers, exporters, and re-processors
- other organisations such as professional and membership organisations, Non-Governmental Organisations, consultants and charitable organisations who have an interest in how electronic waste is managed in the UK
- members of the public

Responding to the call for evidence

Please respond to this call for evidence in one of the following ways:

Online using the Citizen Space consultation hub.

For ease of analysis, responses via the Citizen Space platform would be preferred, but alternative options are provided below if required:

By email to weee@defra.gov.uk

Written responses by post to:

Consultation Coordinator,
Defra 2nd Floor, Foss House,
Kings Pool 1-2 Peasholme Green
York
YO1 7PX

Please note, any responses sent by post must have arrived at the above address by the closing date of the consultation to be counted. Unfortunately, we cannot analyse any responses received after this date. To ensure your response is included in the analysis, please consider responding online via Citizen Space.

Defra is managing the consultation process on behalf of the UK, Scottish and Welsh Governments and the Department for Agriculture, Environment and Rural Affairs in Northern Ireland.

The Scottish and Welsh Governments will have access to the responses provided via the Citizen Space consultation hub. If you would like to send a copy of your response to the Scottish and/or Welsh Governments, then please send by email to:

Scotland: producerresponsibility@gov.scot

Wales: ResourceEfficiencyAndCircularEconomy@gov.wales

If you are responding from Northern Ireland please ensure a copy of your response is also sent to: EPRTeam@daera-ni.gov.uk

Duration

This call for evidence will run from Thursday 28th December 2023 and closes on Thursday 7th March 2024.

After the call for evidence has closed

A summary of the responses to this call for evidence and the government response will be published and made available on government websites at www.gov.uk/defra, www.daera-ni.gov.uk, www.gov.scot and www.gov.wales

The summary will provide a list of organisations that responded but will not include personal names, addresses or other contact details. Information provided in response to this call for evidence document, including personal information will, however, be shared with the Devolved Administrations. It may also be subject to publication or release to other parties or to disclosure in accordance with the access to information regimes for example, the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018.

If you would like any information, including personal data you provide to be treated as confidential, please say so clearly in writing when you submit your response to the call for evidence and explain why you require these details to be kept confidential.

If we receive a request for disclosure under the FOIA, we will take full account of your explanation, but due to the law we cannot provide an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as a confidentiality request.

Defra is the data controller in respect of any personal data that you provide. Defra's Personal Information Charter, which gives details of your rights in respect of the handling of your personal data, can be found at: https://www.gov.uk/government/organisations/department-for-environment-food-rural-affairs/about/personal-information-charter

About you

A wide range of businesses, organisations and individuals are involved with or take an interest in electricals and managing waste electricals. The questions below are intended to grasp this diversity and put your responses in perspective with those of other respondents.

Q1. What is your name?

Q2. What is your email address?

This is optional, but if you enter your email address you will be able to return to edit your n response in Citizen Space at any time until you submit it. You will also receive an acknowledgement email when you submit a completed response.

Q3. Which of the following best describes you?

Please provide the name of the organisation, institution or business you represent and an approximate size/number of staff (where applicable). (Please tick one option. If multiple categories apply, please choose the one which best describes the organisation you are representing in your response.)

- 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:

Q4. Would you like your response to be confidential?

Answer Yes or No

If you answered ‘Yes’, please briefly explain why you require your response to be confidential.

Areas on which we want your views and evidence

1. Full net cost recovery

Background

A key principle of extended producer responsibility (EPR) is that producers (predominantly importers and UK based manufacturers) cover the full net cost of managing the products they place on the market when they become waste. These are set out further below.

The cost of collection and proper treatment of all WEEE arising at Local Authority Household Waste and Recycling Centres (HWRCs) is already financed by producers. Producers are also required to finance the cost of treatment of WEEE returned to Producer Compliance Schemes (PCS) by retailers. Additionally, treatment of WEEE arising at re-use charities is often financed by producers, although there is not an explicit requirement for them to do so in the current regulations. Fees are also charged by the environmental regulators in each part of the United Kingdom on a cost recovery basis to ensure effective compliance monitoring and enforcement of the regime. Producers who place less than 5 tonnes of EEE on the UK market per year are exempt from these financial obligations and simply need to report annual placed on the market data to their environmental regulator.

Schedule 5 of the Environment Act 2021 provides the UK Government with a general power to place obligations on producers to cover a range of costs associated with the disposal of a particular waste stream. Where such obligations are applied, it should be done fairly, be cost reflective and recognise the particular circumstances and collections systems in place for specific types of waste.

Case for change

As part of our commitment to ensure the future WEEE system is compatible with our broader EPR framework, this chapter seeks views and evidence on whether producers should cover other costs associated with the disposal of WEEE, beyond those that they are currently obligated to finance.

The case for change in this call for evidence is framed in terms of a number of ideas, or initial proposals, based on current understanding. We welcome evidence and views on these which will be used to develop and take forward firm proposals, as appropriate.

The accompanying consultation document to this call for evidence sets out proposals for the separate collection of WEEE from households and accompanying communications to be funded by producers. In addition, the consultation document sets out proposals to establish a new producer-led Scheme Administrator, which may be responsible for delivering this household collection system, along with data collection and monitoring and evaluating the effectiveness of the new system.

In summary producer obligations can be categorised as follows:

1. Existing financial obligations:

a. The cost of collection and proper treatment of all WEEE arising at Local Authority Household Waste and Recycling Centres (HWRCs) and waste transfer stations.
b. The cost of treatment of WEEE returned to PCS by retailers.
c. Cost of collection at Local Authority collection facilities and treatment of fly-tipped household WEEE
d. Provision of data to local authorities to support their waste data reporting obligations.
e. Costs associated with takeback obligations incurred by distributors
f. Costs associated with registration and compliance monitoring systems and operations by the regulators.

2. New financial obligations arising from the policy proposals in the consultation:

    a. Capital, overhead and operational costs associated with providing a household collection service for small waste electricals
    b. Capital, overhead and operational costs associated with providing a household collection services for bulky waste electricals
    c. Costs associated with communications and campaigns, both locally and nationally aimed at householders, to raise awareness and thus increase collection rates and levels of re-use and recycling and to minimise inappropriate disposal of WEEE, such as through the residual waste stream.
    d. Costs associated with undertaking data collection, reporting and analysis to assess the impact of the new regulations (eg provision of placed on the market data, WEEE collected data, regular sampling to determine future levels of WEEE in residual waste)
    e. Cost of operating a Scheme Administrator to perform specific functions specified in the revised regulations
    f. Costs incurred by producers arising from creation of a separate category of equipment for vapes
    g. Costs arising from the creation of a new category of producer for Online Marketplaces.
    h. Additional costs incurred by distributors arising from strengthened takeback obligations
    i. Additional costs incurred by the regulator in each nation in undertaking compliance monitoring and enforcement activities associated with the proposed new obligations

The Environment Act 2021 also gives us flexibility to introduce other costs including those incurred in relation to products or materials that have been disposed of unlawfully. In the context of WEEE, this may include:

- Capital, overhead and operational costs associated with providing a collection service for businesses and public institutions
- Costs of collection and treatment of WEEE improperly discarded in the residual waste stream.
- Costs of collection and treatment of WEEE which has been littered, with disposal vapes a case in point.
- Costs of clean up of fly-tipped WEEE.

We therefore welcome views and evidence on the extent that the bulleted measures above should form part of the full net cost recovery model for WEEE.

Areas on which evidence and views are sought

- That producers cover the costs of collection/clean-up of WEEE contained in residual, fly-tipped and littered waste.

Costs of collection and treatment of WEEE in residual waste

We welcome evidence (including cost data) and views on requiring producers to finance the collection and treatment of household WEEE disposed with residual waste (ie "black bag waste").

It could be argued that producers should take full financial responsibility for products they place on the market, regardless of the discard route chosen by the householder. Including the costs of collection and treatment of WEEE in the residual waste stream could incentivise producers to design and manufacture products which move within re-use and repair loops, in turn creating circular services to manage the product. Not including these costs could have unintended consequences for example by disincentivising producers from encouraging WEEE to be shifted from residual waste to recycling or preparation for re-use through effective communications.

However, it could also be argued that if Local Authorities will in any event receive producer funding for the cost of processing WEEE in residual waste, then they may be less inclined to support the implementation of the producer-led household collection system, on which we are currently consulting.

It is arguably the case that householders must themselves take personal responsibility for dealing appropriately with their waste electricals. Unlike packaging for example, household electricals tend not to be transient and can all be recycled thereby providing for a simple communications message to householders to do the right thing. This is against a backdrop in which producers would in future be financing the costs of convenient, separate household collection of WEEE that is commonly disposed of in residual waste today along with necessary communications to households about those WEEE collection and recycling services.

Costs of littered and fly-tipped WEEE

The packaging waste reforms will extend producer responsibility to the costs of packaging disposed of in street bins and communication campaigns on litter across the UK. The Scottish and Welsh Government's policy is to recover costs of packaging littered on the ground from producers of packaging and their Governments will come forward with proposals for implementing this in due course.

Of the 976,000 incidents of fly-tipping reported in 2019/20, 5% included white goods and 1.5% included other electricals. The WEEE Regulations already ensure that the cost of transport away from the Local Authority area and proper treatment of fly-tipped household WEEE is met by producers. We will explore how this provision can be extended to non-household EEE in future proposals for reform of the non-household financing obligations placed on producers. The provision of effective communications and free-of-charge collections, financed by producers, from the home should negate any perception that fly-tipping is a convenient way to get rid of unwanted electricals. Those measures should therefore result in a reduction of fly-tipping, which is a criminal offence, by householders or those disposing of household waste on their behalf.

However, there remains a question as to whether liability for clean-up of fly-tipped WEEE should fall on producers. The same principle can be applied for the management and clean-up of littered WEEE, with vapes a particular issue. Electrical equipment, mostly, is not designed to be consumed and discarded “on the go” and as such does not generally contribute to littering when it becomes waste. As with residual waste, including these costs may mean producers are further incentivised to design and manufacture products which move within re-use and repair loops, in turn creating circular services to manage the products.

We welcome evidence (including costs) and views on whether the full cost of collection and treatment of residual, fly-tipped and littered WEEE, cleared by Local Authorities, should be met by producers.

When collating your responses, please highlight any evidence sources that you think we should consider.

Questions

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) WEEE in the residual waste
    b) Fly-tipped WEE
    c) Littered WEEE

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

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

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

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

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

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

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

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

14. Please provide evidence of the types of WEEE commonly littered.

2. Allocation of costs for the collection and treatment of household WEEE

Background

The WEEE Regulations require the producers of household equipment to take collective financial responsibility for the environmental impact of the products that they place on the market when those products become waste.

Setting of annual household collection targets are the mechanism within the existing regulations which enables financial obligations to be placed on producers to ensure WEEE is collected and treated properly. Producers, via membership of their PCS, either meet this financial obligation by collecting WEEE, paying a “compliance fee” in lieu of the costs incurred from undertaking collections or a combination of both.

If targets are not met, then PCSs must pay a compliance fee, as an alternative form of compliance, and thus pay their avoided costs. Funds raised are used to support communications campaigns aimed at householders, local projects designed to increase levels of collection for re-use and recycling and research.

Targets on WEEE processors for recovery, recycling and re-use of separately collected WEEE are covered in **Chapter 6 on treatment standards** of this call for evidence.

Setting targets on an annual basis allows for adjustments to take account of market trends and technology changes that impact on levels of WEEE being discarded. Some stakeholders have raised concerns that this short-term approach to target setting can lead to lack of certainty for business and confidence in making longer-term contractual relationships and investments. We therefore invite views on whether we should adopt a longer-term approach in future. Targets are set on a UK-wide basis by the Secretary of State in consultation with devolved administrations. Data is collected and reported on a UK-wide basis but there is currently no breakdown of data reported at individual nation level. The devolved administrations are keen to ensure that impacts of the future regulations can be assessed within each nation and take action should that impact fall below minimum requirements.

The current system has not led to substantial increases in separately collected household WEEE. We know that significant volumes are hoarded, discarded with residual waste or treated outside the current producer financed system. This is not just a UK problem. Member States of the EU generally have been unable to meet the 65% of EEE placed on the market target that has been in force since 2019. Whilst easy to measure, reliance on these targets as the foundation of driving change in consumer behaviour has had very limited success. Furthermore, the link between what we buy and what we throw away, which is a feature of EU legislation, is not a direct one which makes any system of collection targets based on what is placed on the market likely to be a flawed measure of success. Our departure from the EU presents an opportunity to consider other ways of driving good environmental outcomes via better regulation.

Aside from targets, there is strong evidence that properly resourced engagement with consumers, supported by an accessible infrastructure, delivers significant improvements in collections in a number of European countries.

Instead of collection targets, we therefore want to focus on developing the necessary infrastructure. Chapter 1 of the accompanying consultation document seeks views on Government proposals intended to make it much easier for householders to send unwanted

items for re-use or recycling thereby driving down the levels of WEEE in residual waste, hoarded at home or discarded illegally. This new collection infrastructure would be supported by appropriate producer funded communications to raise awareness on options to consumers for the proper disposal of WEEE.

The case for change

We welcome evidence and views on replacing the current annual target setting process with a mechanism in which a forecast of WEEE arisings in each of the categories of EEE is published to replace the current targets-based approach. That forecast could be based on initial proposals by the WEEE Scheme Administrator and subsequently developed and mandated by Government. The forecast would then be translated into financial obligations placed on a PCS according to the market share of the membership across each of the categories of EEE. However, unlike a target, the forecast would be an objective assessment of WEEE likely to arise and collections against that forecast would not be a key performance indicator against which to measure success. Views on potential alternative measures of success are sought in Chapter 5 of the accompanying consultation document.

A compliance fee mechanism would remain for those schemes who fail to meet their obligations in any single year although producers and PCSs should be encouraged to secure physical collections rather than rely on the compliance fee to meet their obligations. The existing arrangement guarantees that Local Authorities have all their WEEE collected, and that this will be funded by PCSs, even when financial obligations set at the start of the year had been met and would also remain.

We welcome evidence and views on establishing a rolling 3-year process for setting the financial obligations of producers. Whilst setting future direction, it would nevertheless have to be reviewed annually to take account of market changes which may act to reduce its effectiveness. Nevertheless, some stakeholders have suggested it could help address concerns about issues of short termism in the marketplace and uncertainty about future supply of material which act to constrain new investment. We welcome evidence on whether such an approach could help to alleviate concerns expressed by the treatment sector about the current annualised approach.

We would welcome evidence and views on whether changes to the WEEE code of practice to require a minimum three-year contract duration between PCS and Local Authority DCF operators could also help overcome the concerns about the current annualised approach.

Alternative Approaches

Finally, we welcome evidence and views on whether there is appetite for more wholesale change to the system with financial obligations in the future being based on an “allocation system”. Under this approach PCSs would be allocated to Local Authorities, distributors and other economic operators that have WEEE in one or more of the collection streams that they wish to hand over to PCSs for treatment.

The financial obligation placed on producers would continue to be based on market share and the amount of WEEE arising in the system in any compliance period. A forecast would be used to set tonnage obligations for PCS.

Producers could continue to make arrangements with their PCS to use tonnages collected via their own direct collection systems to offset their obligations financed by the PCS. Direct

collections above those required to fulfil their own obligations would be included in the matching process. This approach was considered in the last consultation on reforming the WEEE producer responsibility system in 2012. Following the outcome of that consultation, such an approach was not adopted, but we would welcome views on the merits of looking again at this approach.

Questions

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

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.

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?

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?

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

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.

3. Prevention of waste and increasing re-use of unwanted electrical and electronic equipment

Background

We are committed to policy interventions that prioritise prevention of waste including re-use over recycling where possible, in line with the waste hierarchy. To further this aim, the UK Government published a new Programme, titled 'Maximising Resources, Minimising Waste', in July 2023 which outlines proposed actions to prevent waste arising in seven key sectors (construction, furniture, vehicles, food, plastic packaging, textiles, and electronics).

The proposals in the consultation document that place enhanced takeback obligations on distributors and the introduction of producer-led household collection system from the home will increase levels of re-use over recycling. However, we want to explore what more can be done.

There are various ways in which greater re-use of unwanted equipment can be facilitated and encouraged. These include designing products to last longer and to be more easily repairable

(for example, with modular components) and diverting unwanted working equipment away from waste sites (for example, to charities).

Both the Scottish and Welsh Governments have committed to support repair and re-use hubs, including repair cafes. In Northern Ireland, DAERA funding assisted the establishment of the Northern Ireland Resource Network to provide support to organisations to move resources further up the waste hierarchy and to promote re-use and repair as alternative methods of dealing with our resources.

Producers who do not meet their collection targets are obligated to pay a compliance fee. Funds raised by the compliance fee are managed and disbursed by an independent organisation called Material Focus and is used to support numerous local reuse initiatives. Monies raised by the Distributor Takeback Scheme – a scheme which allows some retailers to opt out of their obligation to offer in store take back of WEEE – has also been used to support Local Authority projects aimed at encouraging reuse.

The regulations currently state that preparation for re-use must be prioritised by PCSs. Collection of WEEE for preparation for re-use is counted by PCSs towards collection targets along with that which is collected for recycling.

In addition, many retailers who offer take back of unwanted EEE from consumers in their stores or via their collection on delivery services will ensure that that material is diverted for re-use where appropriate.

Case for change

There is already a significant amount of re-use, including through online marketplaces and through consumers passing their old items onto family members or friends. But some products suitable for re-use are recycled, incinerated or landfilled. Some products may never be used at all, possibly because of overstocking or returns of on-line sales.

This review is an opportunity to support the drive towards the circular economy by championing higher levels of re-use and thus ensuring products stay in use longer.

Whilst PCSs have an obligation to prioritise re-use of whole appliances over recycling, in line with Regulation 30 of the WEEE Regulations, there is little evidence to understand the extent to which that actually happens. Anecdotal evidence suggests PCSs will often be constrained by the facilities provided at Local Authority Household Waste and Recycling Centres (HWRCs) which may not be conducive to protecting equipment such that it could be re-used. The system does however reward PCSs for prioritising re-use by allowing WEEE collected for re-use to be counted towards collection targets. It is also worth noting the inherent commercial incentives in selling functional, used equipment versus the cost of sending that equipment for recycling.

There is a data gap on the level of re-use across the economy in the many circumstances in which electrical equipment is not received as waste before being re-used.

Local Authority HWRCs are increasingly using measures to segregate items for re-use through on-site shops and partnerships with local re-use charities. However, items diverted to those re-use outlets will typically **not** be captured by the WEEE system and there is no data available to us since it is not deemed to be waste (although some Local Authorities and recycling centres may be capturing this data)

Our ability to ensure more WEEE is re-used is contingent on ensuring that it is managed in a way that supports re-use. Therefore, we need to consider measures to encourage re-use of

WEEE in relation to both our existing collection infrastructure and our proposals to expand this infrastructure through household collection and enhanced retailer obligations and to maximise opportunities for re-use through these collection networks.

Areas on which evidence and views are sought

We welcome evidence on how the existing system could better support greater prioritisation of re-use in line with the waste hierarchy. We consider that there are four measures that could be incorporated into future regulations but lack evidence on the likely costs and benefits of each one to support further policy development:

- That giving 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 more collections for re-use (or preparation for re-use).

This might mean that a tonne of WEEE collected for re-use (or in preparation for re-use) could count for example as 1.5 tonnes towards collection obligations under this model. The starting point is that all WEEE arising from local authorities and retailer take back channels will be collected and financed by producers. PCSs are set an obligation expressed in tonnes of WEEE that they need to finance. But under this principle, if a PCS had a financial obligation of say 90 tonnes but its entire collections were sent for re-use (or preparation for re-use) they would only need to finance 60 tonnes to have met their financial obligation. Further evidence will be needed to establish the extent to which tonnage collected for re-use tonnage should be modulated to reflect the higher environmental value of re-use over recycling. It would have to be set at a level that incentivised PCSs and their partners to ensure re-use (or preparation for re-use) was actively considered in their approaches to collection, transport and handling of WEEE. It would also be necessary to ensure robust measures were put in place to prevent fraudulent evidence being issued for re-use (or preparation for re-use).

- 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).

Any such target could fall on PCSs as a subset of their WEEE collection obligations, but such targets could also feasibly be placed on other actors that handle WEEE. Treatment facilities for example are already required to meet a combined recycling and re-use target and an overall separate recovery target.

- 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.

Many re-use charities are approved as collection and/or treatment facilities under the WEEE Regulations. Some charity shops also accept donations of equipment. Mandating the collection of equipment that was donated but subsequently deemed unsuitable for re-use from these organisations by PCSs would remove a potential cost from the re-use charity sector that could inhibit further investment in the sector.

- That we should as for additional data collection from retailers and local authorities to better understand how much used EEE is received at these collection facilities for re-use and consequentially diverted away from entering the WEEE producer

responsibility system would provide significant new insight into volumes of equipment being re-used that is not classified as waste.

Large quantities of used equipment collected by retailers and Local Authorities goes unreported because it is diverted from the waste stream for reuse, repair or refurbishment. Asking retailers and Local Authorities to report data on used equipment that was collected for re-use would help to provide a more complete picture of the amount of equipment being diverted from the WEEE system for re-use, enabling more robust policy development. The WEEE Regulations already require retailers to keep records of the volumes of WEEE being returned to them via take back although there is no reporting obligation.

We could introduce new reporting obligations to understand how much material is being diverted for re-use or pursue voluntary approaches.

Questions

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 re-use) of WEEE? Please select one of the following options:
    a. Agree
    b. Disagree
    c. Unsure

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

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

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

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

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

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

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

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

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

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.

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

Background

Encouraging ecodesign and a whole lifecycle approach to design of products is a key part of achieving a more resource efficient, circular economy. Reducing the amount of equipment we manufacture and ensuring more WEEE is reused or recycled can help cut carbon emissions and achieve wider environmental goals as well as helping to safeguard critical stocks of the earth's natural resources. Research shows that the resource extraction for, and manufacturing of, electronic products such as mobile phones contribute to more than 50% of their total lifetime CO2 emissions.

Existing ecodesign legislation ensures that many electrical products are designed to meet certain minimum energy and resource efficiency criteria. These include measures such as availability of spare parts and information for repairers for large household appliances such as washing machines, dishwashers and household refrigerators. The UK Government has published an energy-related products policy framework which sets out how we will push products to use less energy, resources, and materials, saving carbon and helping households and businesses to reduce their energy bills with minimum effort.

Case for change

The existing WEEE Regulations do not encourage producers to design products that support the circular economy. Several countries have introduced modulated producer compliance costs (explained below) which is designed to incentivise better ecodesign of products but there is little evaluation to date of the success of these measures. Further work is therefore necessary to ensure any such system introduced in the UK is fit for purpose. A BEIS call for evidence on Ecodesign policy revealed that across most products, respondents felt better resource efficiency measures, including better availability of spare parts and repair and maintenance information, could be introduced.

"Eco-modulation" could be one tool to drive better design. Under a modulated approach to EPR, the costs paid by the producer will vary according to specific criteria relating to aspects of their products' environmental performance. The fundamental principle is that compliance costs are lower for producers of products that meet specified criteria compared to those that do not.

Areas on which views and evidence are sought

- That implementing a system of eco-modulation into the UK's WEEE system could incentivise more sustainable product design.

In the UK, producers (via membership of a PCS) are required to finance the collection of an amount of WEEE in each category of EEE based on their market share for that category and enter into contracts with collectors, transport operators and treatment facilities to process WEEE to meet their obligations under the WEEE Regulations.

Research commissioned by Defra analysed three potential approaches for incorporating the principle of eco-modulation into the UK's WEEE System. The first was the introduction of a new system for EPR in which fees paid by producers to their compliance schemes to cover the cost of collection and treatment of WEEE would be modulated to reward good product

design or penalise poor product design. This would be decided according to potential resource efficiency criteria (examples are given below). The second was a modification to the WEEE Regulations which saw modulation of a producers' market share data so that those producers whose products have a greater negative environmental impact are made responsible for financing a greater share of household WEEE arising compared to those whose products have a lesser environmental impact. Finally, the research also explored a deposit return scheme system but discounted this approach due to several challenges in embracing such an approach for sales of EEE. The research recommended the second option of modulating compliance of costs through the adjustment of market share data. This would align with the UK's current EPR system, in which producers must finance the collection and treatment of WEEE in proportion to their market share across 14 product categories.

The research analysed three potential metrics to prioritise product groups to apply eco-modulation – product weight, number of units sold and the carbon footprint of products.

Determining good eco-design of these products would be based on detailed eco-design criteria. Examples of possible criteria identified by the research are:

- recycled content
- repairability
- durability
- energy efficiency
- disassembly
- presence of hazardous substances

The research suggested that eco-modulation could offer potential synergy with eco-design regulations on the basis that it is harmonised with other international regulations, although further work will be needed to ensure an eco-modulation approach that's fit for purpose.

Research has shown there is a preference for a system of self-declaration to determine compliance with the criteria, but with the stipulation that standards and measurement methodology should be in place to complete an evidence-based declaration process.

Labelling could also be used to communicate to consumers the extent to which products have been designed to meet certain eco-design modulation criteria.

- 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.

Circular business models (such as product leasing models rather than product sales) can also make a significant contribution to the circular economy since products are more likely to undergo repair and refurbishment and stay in use longer. Ownership of products supplied in this way is retained by the service provider and therefore should not arise as household waste which arguably supports the view that they should be discounted from a producers' collection obligations under the WEEE Regulations.

Questions

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

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

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

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.

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

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.

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)

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

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

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)

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

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

5. Increasing collections of business WEEE

Background

The WEEE Regulations place different obligations on producers in relation to WEEE arising from households and that from business and other non-household end users.

Unlike the household WEEE system, the WEEE Regulations simply require producers through membership of a PCS to establish a system of return for business WEEE from the end user. In practice the point of return is most likely to be a treatment facility with which the PCS has a contract. But the end user must identify the relevant producer of each item of WEEE and their PCS before arranging delivery of the items to the nominated collection facility. The system is therefore cumbersome to access and is likely to contribute to low levels of business WEEE collections. Producers also have an option to pass on their WEEE obligations to the business end user at point of sale. It is also true that businesses will likely recognise the potential value of redundant industrial equipment and will seek to retain that value rather than returning it to the producer thereby also contributing to low levels of reported returns.

Equipment sold to businesses (for example, a laptop) that is of a nature that could equally be sold to a householder is currently reported as household equipment when it is placed on the market and if it is returned to the producer as waste. This further contributes to a lack of robust data on the quantity of EEE sold to businesses and the destination of that equipment when it is discarded.

The Welsh Government is committed to bringing in new regulations to require, from 6 April 2024, the occupiers of all non-domestic premises to separate key recyclable waste (including unsold small WEEE), and for these streams to be collected separately for recycling.

Case for change

We recognise the need to make the WEEE system simpler for business and other non-household end users to understand and access. We want to explore an approach for business and other non-household WEEE in which the producers' collection obligation starts at the premises of the business.

Areas on which views and evidence are sought

Due to the current lack of available evidence on business WEEE flows we have not arrived at a set of policy options at this stage. The call for evidence is intended to gather evidence and views on ways in which the existing system could be enhanced or made simpler for business and other non-household end users of equipment. We consider that there are two measures that could be incorporated into future regulations to drive improvements:

- 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 delivered via membership of a PCS, designed to increase volumes of separately collected WEEE from businesses and financed by producers.

One option is to extend the principle of producer responsibility to the premises of the end user. Organisations would contact the producer or their PCS to arrange a free of charge collection. If they cannot identify the original producer, or in the case of a mixed load of WEEE, they could contact any PCS to request a free of charge collection.

In such circumstances a system would be required to apportion the costs of collecting WEEE fairly amongst producers to ensure all producers of business equipment, via their PCSs had funded their share of the total business collections over a year. Incentives could also be built into the system to reward those producers operating circular economy business models for example, leasing and re-use/refurbishment activities. Appropriately funded communications would be a necessary part of producer responsibilities.

We also welcome evidence on whether the definition of household and non-household equipment should be changed so that the classification is defined via route to market, such as equipment sold through professional channels would be classified as non-household and that sold via retail/household facing channels as household equipment. In adopting such an approach more accurate data may be reported on equipment sold to businesses and WEEE arising in businesses in which the collection and treatment was financed by producers.

- That we should introduce a ban on businesses from sending whole items of electrical equipment (such as surplus stock), to landfill or incineration.

There is some evidence to suggest that some producers and distributors may be disposing of equipment before it has reached end of life. These items might be new or unused and are likely to be a combination of out-of-season stock, unsold or surplus stock, or customer returns. There may be commercial or financial reasons behind a decision to dispose of stock to landfill or incineration. A ban on those disposal routes would further support the drive towards the circular economy by championing higher levels of re-use amongst items discarded as waste.

Wales will also be extending the current bans on separately collected plastic, metal, glass and paper going to landfill and incineration to also include, for incineration, separately collected small WEEE, card, and food, and, for landfill, separately collected small WEEE, card, food and textiles, and all wood.

Questions

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

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

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

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

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

49. If you answered yes to question 28, please set out what these product types might be.

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

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

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

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

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

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

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:

    - Reselling
    - Repair / refurbishment
    - Re-use
    - Recycling

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

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

6. Improving treatment standards

Background

The existing requirements governing the proper treatment of WEEE are largely set out in the various environmental permitting regulations across each part of the United Kingdom rather than the WEEE Regulations. Those requirements apply to all Authorised Treatment Facilities (ATFs) via the conditions set out in permits issued by the relevant regulator. Approved Authorised Treatment Facilities (AATFs) are able to issue evidence to PCSs for treatment undertaken on their behalf. This evidence is used by PCSs to demonstrate the extent to which they have met their financial obligations for the collection and proper treatment of WEEE.

In addition to the minimum treatment requirements, the WEEE Regulations require AATFs to meet minimum recovery and re-use/recycling efficiencies. PCSs must ensure that WEEE that is counted towards their obligations also meets these minimum recovery and re-use/recycling efficiencies.

The current Best Available Treatment Recovery and Recycling Techniques (BATRRT) Guidance sets out minimum requirements for WEEE treatment. The principles of BATRRT, and other necessary measures have been consolidated into overarching guidance by the Environment Agency, Waste Electrical and Electronic Equipment (WEEE): Appropriate Measures for Permitted Facilities and Waste Temperature Exchange Equipment: Appropriate Measures for Permitted Facilities. This is independent of the wider WEEE policy review and consultation.

In addition to compliance with the above requirements treatment facilities must comply with wider waste management legislation. This includes the Hazardous Waste (England and Wales) Regulations 2005 and corresponding legislation in the other devolved administrations. These set out the regime for the control and tracking of hazardous waste. WEEE can also contain Persistent Organic Pollutants (POPs), usually as additives to plastic or as coatings, which may or may not lead to classification as hazardous waste, due to the way rules on waste classification operate. Where POPs are present above certain thresholds, those WEEE derived materials must be sent for destruction at sites that are technically capable of achieving this.

Case for change

Beyond reform of the WEEE Regulations, we are exploring:

- product passports - which would identify the quantity and type of materials within a given product. This could include Critical Minerals (CMs)
- tracking information on products – which will look at ways of improving the communication of information about products, such as the presence of hazardous substances, through supply chains to the waste stage. This aims to reduce the risks posed by hazardous chemicals in waste, facilitate improved re-use and recycling, and

enable suppliers and consumers to make better informed decisions. Options include the use of product labels linked to a central database of information.

- waste tracking – our recent consultation looked at ways of tracking the quantity and type of waste generated, and what happens to it. This could potentially provide information on the location and amount of waste materials that could be put to more productive use, and support investment and recycling.
- the waste hierarchy for hazardous waste – we want to explore ways to raise the management of hazardous waste up the hierarchy and this commitment complements other objectives here.

It is important to ensure proposals focussed on better treatment of WEEE complement this wider policy development. The minimum requirements for WEEE treatment set out in the BATTRT guidance and the recycling and recovery rates placed on AATFs have changed little since 2006. However, in the drive towards the circular economy and to support our Net Zero commitments there is a need to explore measures that could drive improved material recovery, particularly in complex waste streams such as WEEE that contain a multitude of materials (including critical materials) some of which are lost during the recovery and recycling processes.

However, waste managers are often not aware of the detailed composition of the items they receive for processing. An Industry Council of Electronics Recyclers (ICER) study has revealed the extent of the issue. The resulting disruption and cost of adapting to move towards compliance with POPs (and waste classification) rules has been significant. Waste managers need to be better informed. We recognise that reporting and traceability of "substances of concern" in products could play a role in facilitating the circular economy by enabling the waste sector to develop appropriate processes and infrastructure to target these substances. Product passports or other means of reporting by producers of EEE, could play a role in informing waste managers and repairers of these substances, as well as valuable components that could be prioritised for recovery. This information could inform assessment of the recyclability, repairability or sustainability of products (from a chemicals perspective), thereby enabling incentives such as modulated fees or recovery targets to be established. This approach could potentially strengthen linkages between waste, chemicals and manufacturing sectors and legislation.

Critical minerals are those that are important to a nation, region or sector's economy and that are, or could become difficult to obtain. The UK Government has set out its first ever Critical Minerals Strategy which aims to maximise what the UK produces along the critical minerals value chain – through mining, refining, manufacturing and recycling – in a way that creates jobs and growth and protects communities and our natural environment. Critical minerals are not only vitally important to the economy but can also be subject to security of supply risks. Much critical minerals' production is highly concentrated in particular countries, are non-substitutable in their applications and have low recycling rates. Consequently, it is key that we make better use of what we have by accelerating a circular economy of critical minerals in the UK – increasing recovery, reuse and recycling rates and resource efficiency, to alleviate pressure on primary supply. In the Strategy, we committed to explore regulatory ways to promote recycling and recovery, including through reforms to the WEEE regulations and through the future consultation on waste batteries.

Many of the electronic devices we use every day such as computers, tablets and mobile phones require a multitude of mined metals and materials to develop the sophisticated circuit boards, microchips and batteries required to deliver functionality and performance. By way of example, the average smartphone requires 72 elements found in the periodic table, 62 of

which are metals, these include zinc, gold, copper, palladium and tantalum to name just a few. Within the 123,901 tonnes of PCs, laptops, mobile phones, tablets, televisions (TVs), monitors and lighting WEEE formally collected for recycling in the UK each year, 378.91t of critical minerals are 'lost' in processing (for example, in the shredding dust) or exported for treatment each year (and either lost or recovered).

This call for evidence provides an opportunity to gather evidence and views that support further policy development in this key area.

Areas on which views and evidence are sought

- That the recovery and recycling rates for WEEE should be reviewed to ensure that those targets remain sufficiently challenging whilst achievable.

The current recycling and recovery targets for each category of WEEE have not been updated since 2006. We welcome evidence to support a review to ensure those treatment targets remain sufficiently challenging to drive higher levels of recycling and recovery, whilst remaining achievable.

- 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.

To undertake a fundamental review of treatment standards, we first require accurate data on the extent to which the existing targets are being achieved and exceeded by those businesses that might be regarded as best in class.

Currently businesses are required to provided evidence to regulators, when asked, that those targets are being met but there is there is no mandatory reporting obligation.

- That introduction of individual recovery rates 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.

The existing regulations do not directly encourage the recovery of specific materials. We therefore welcome your views and evidence on the principle of applying individual recovery rates to specific materials (for example, specified critical minerals, metals and plastics) and how those rates should be calculated and applied. Such reporting could also extend to the type and volume of hazardous substances removed and the quantity of POPs destroyed

There are many critical minerals, (for example, magnesium, cobalt and tantalum), found in WEEE and we would welcome evidence on the challenges and opportunities of setting minimum recycling and recovery rates.

Questions

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

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

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

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

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

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

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

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

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

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.

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

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

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?

Consolidated list of questions

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:

    d) Residual waste
    e) Fly-tipped waste
    f) Littered waste

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

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

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

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

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

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

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

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

14. Please provide evidence of the types of WEEE commonly littered.

Allocation of costs for the collection and treatment of household WEEE

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

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.

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?

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?

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

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

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 re-use) of WEEE? Please select one of the following options:
    a. Agree
    b. Disagree
    c. Unsure

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

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

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

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

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

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

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

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

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

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.

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

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

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.
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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.

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    a. Recycled content
    b. Recyclability
    c. Reparability
    d. Durability
    e. Energy efficiency
    f. Hazardous substances

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.

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)

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:

d) Agree
e) Disagree
f) Unsure

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

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:
    d) QR Code (or other electronic tag)
    e) Physical label
    f) Alternative format (please specify)

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

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

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

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

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

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

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

49. If you answered yes to question 28, please set out what these product types might be.

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

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

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

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

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

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

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:

    - Reselling
    - Repair / refurbishment
    - Re-use
    - Recycling

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

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

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

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

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

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

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

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

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

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

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

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.

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

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

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?

Glossary

ATF – Authorised Treatment Facility

- Any waste site that has a permit or a permit exemption

AATF - Approved Authorised Treatment Facility

- An ATF with an additional approval that allows them to issue evidence of the re-use, recycling and recovery of WEEE.
- Must be permitted to accept and treat WEEE.

In Northern Ireland, this exemption is enshrined in Paragraph 49, Schedule 2, Part I of The Waste Management Licensing Regulation (Northern Ireland) 2003 (as amended

B2B - Business to Business

- Alternative reference to non-household EEE or WEEE.
- EEE or WEEE that is designed for business/industry/professional use only.
- Does not include items that can also be used by householders

BATRRT - Best Available Treatment, Recovery and Recycling Techniques

- Published guide specific to WEEE. This is currently being updated

CM - Critical Minerals

- metals and minerals for which the extraction is a political, economic and environmental concern.

DCF - Designated Collection Facility

- A site which is approved to collect WEEE under the WEEE Regulations.
- Must comply with DCF Code of Practice

DAERA - The Department of Agriculture, Environment and Rural Affairs

- DAERA has responsibility for food, farming, environmental, fisheries, forestry and sustainability policy and the development of the rural sector in Northern Ireland
- The Department assists the sustainable development of the agri-food, environmental, fishing and forestry sectors of the Northern Ireland economy

DEFRA - The Department of Agriculture, Environment and Rural Affairs

- DAERA has responsibility for food, farming, environmental, fisheries, forestry and sustainability policy and the development of the rural sector in Northern Ireland
- The Department assists the sustainable development of the agri-food, environmental, fishing and forestry sectors of the Northern Ireland economy

EEE - Electrical and Electronic Equipment

- All electrical and electronic items are considered to be in scope of the Waste Electronic and Electrical Equipment Regulations (2013) unless they meet one of the exemptions as set out in regulation 7 of those Regulations

EPR - Extended Producer Responsibility

- This is a policy approach under which producers are given a significant responsibility – financial and/or physical – for the treatment or disposal of the products they place on the market when they become waste

HWRC - Household Waste and Recycling Centre

- These are provided by the Local Authority as a place where residents can safely dispose their household waste and recycling usually free of charge.

Most Local Authorities will register their HWRC as a Designated Collection Facility in order to be able to accept WEEE

PCS - Producer compliance scheme

- 'A producer compliance scheme (PCS) is a membership organisation. The members are producers of electrical and electronic equipment (EEE).
- A PCS is responsible for registering all its members every year and must:
- ensure it meets its financial obligations under the WEEE regulations
  fulfil its data reporting obligations

POPs - Persistent Organic Pollutants

- Manufactured chemicals that are banned under the Stockholm Convention on Persistent Organic Pollutants. The Stockholm Convention is an international environmental treaty that aims to eliminate or restrict the production and use of persistent organic pollutants.
- Includes common flame retardants such as DBDE (decabromodipheny-l ether) and others.
- The use of POPs in new electrical products has been restricted in UK since 2006 under the RoHS Regulations.

RoHS Regulations - Restriction of the use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012

- Sister Regulations to the WEEE Regulations.
- Limits the use of certain chemicals in EEE.

WEEE - Waste Electrical and Electronic Equipment

Waste electrical and electronic equipment (WEEE) is any electrical or electronic waste, whether whole or broken, that is destined for disposal.

List of evidence sources

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UN Environment Programme (2017) 'The Long View: Exploring Product Lifetime Extension'

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Material Focus (2020) 'Electrical Waste: Challenges and Opportunities' -

https://wrap.org.uk/resources/reprort/quantifying-composition-municipal-waste

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Material-Focus-Update-to-A-Review-Economic-and-Environmental-of-Kerbside-Collections-for-Waste-Electricals-March-2022.pdf (squarespace.com)

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Valuation of externalities of selected waste management alternatives: A comparative review and analysis - ScienceDirect

DEFRA (2021) Fly-tipping statistics for England, 2020 to 2021 (December 2021).

Resilience for the Future: The United Kingdom's Critical Mineral Strategy (2022)

World Energy Outlook, International Energy Agency, 13 October 2021; The Role of Critical Minerals in Clean Energy Transitions, International Energy Agency, 5 May 2021.

A review of the environmental fate and effects of hazardous substances released from electrical and electronic equipment during recycling: Examples from China and India - ScienceDirect

Electronic waste and their leachates impact on human health and environment: Global ecological threat and management - ScienceDirect

Evidence Review of Fly-tipping Behaviour.pdf (zerowastescotland.org.uk)

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https://www.eunomia.co.uk/reports-tools/the-climate-change-impacts-of-recycling-services-in-wales

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https://www.gov.uk/government/consultations/packaging-and-packaging-waste-introducing-extended-producer-responsibility

https://www.gov.uk/government/collections/business-population-estimates

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European Commission analysis of the WEEE value chain summarised by Anthesis to Steel, Aluminium, Glass, and Dense Plastics.

The Green Book: appraisal and evaluation in central government - GOV.UK (www.gov.uk), page 63

Electronic waste and their leachates impact on human health and environment: Global ecological threat and management - ScienceDirect

Valuation of externalities of selected waste management alternatives: A comparative review and analysis - ScienceDirect

Mineral Extraction - an overview | ScienceDirect Topics

Increased carbon footprint of materials production driven by rise in investments | Nature Geoscience
metals_environmental_risks_report_english.pdf

Royal Society of Chemistry and Ipsos Mori (2019): Elements in Danger – Consumer survey

Dale, L. & Fujita, S. (2008), "*An Analysis of the Price Elasticity of Demand for Household Appliances";* University of California Berkeley, (February 2008).

Green Alliance: levelling up through circular economy jobs - https://green-alliance.org.uk/publication/levelling-up-through-circular-economy-jobs/

25 Year Environment Plan - GOV.UK (www.gov.uk)

Clean Growth Strategy - GOV.UK (www.gov.uk)

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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 evidence 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 are 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"

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, componet 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 re-use 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.

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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

f 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.

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PEOPLE AND COMMUNITIES COMMITTEE

Belfast City Council

Subject:	Request for the use of Parks for 2024 Events
Date:	12 March 2024
Reporting Officer:	David Sales, Strategic Director of City and Neighbourhood Services
Contact Officer:	Stephen Leonard, Neighbourhood Services Manager

Restricted Reports

Is this report restricted? **Yes** [ ] **No** [x]

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number [ ]

1. Information relating to any individual.
2. Information likely to reveal the identity of an individual.
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained.
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction.
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	[ ]
After Council Decision	[ ]
Sometime in the future	[ ]
Never	[ ]

Call-in

Is the decision eligible for Call-in? **Yes** [x] **No** [ ]

1.0	**Purpose of Report/Summary of Main Issues**
1.1	The Committee is asked to note that Council has received several requests from event organisers to host events across several city park locations in 2024, including: • Paws for Cause – Ormeau Park • Belfast Memory Walk – Ormeau Park • Parkinson's Walk – Botanic Gardens • Ulster University 5km Run Festival – Cathedral Gardens • ASG & Partners Concert – C.S. Lewis Square • Finaghy Cultural Festival - Wedderburn • EID Festival – Botanic Gardens • Darkness into Light - Ormeau Park •
2.0	**Recommendation**
2.1	The Committee is asked to grant authority to the applicant for the proposed event on the dates noted and to delegate authority to the Director of Neighbourhood Services to ensure the following: i. If appropriate, negotiate a fee which recognises the costs to Council, minimises negative impact on the immediate area and takes account of the potential wider benefit to the city economy, in conjunction with the Councils Commercial Manager. ii. Negotiate satisfactory terms and conditions of use via an appropriate legal agreement prepared by the City Solicitor, including managing final booking confirmation dates and flexibility around 'set up' & take down' periods, and booking amendments, subject to: iii. The promoter resolving any operational issues to the Council's satisfaction. iv. The promotor carrying out appropriate resident & community engagement v. The promoter meeting all the statutory requirements of the Planning and Building Control Service including the terms and conditions of the Park's Entertainment Licence.
2.2	Please note that the above recommendations are taken as a pre-policy position in advance of the Council agreeing a more structured framework and policy for 'Events', which is currently being taken forward in conjunction with the Councils Commercial team.
3.0	**Main Report**
	<u>Key Issues</u>
3.1	If agreed, the event organiser or promoters will be required in advance of the event to submit an event management plan for approval by the Council and all relevant statutory bodies. This will include an assessment of how the event will impact upon the surrounding area and measures to mitigate these impacts.
	<u>Street Soccer NI – Paws for Cause – Ormeau Park – Saturday 11 May 2024</u>
3.2	Street Soccer NI have requested the use of Ormeau Park for their Charity Dog Walk called Paws for Cause. The event is to raise money for Street Soccer NI who are a registered charity. Their charity number is 104007.

	Key dates for the event are: Set Up -10.00am– Saturday 11 May Main Event – 11am to 1pm De-Rig – 1.15pm
3.3	The event organiser has requested that the council will allow them to have charity buckets on site to collect donations from the public throughout the event, They also wish to have traders and vendors on site to sell some merchandise along with supplying options for visitors to purchase food.
3.4	**Belfast Memory Walk – Ormeau Saturday 12 October 2024** The Alzheimer's Society has requested the use of Ormeau Park for their Belfast Memory Walk charity event. Belfast Memory Walk is a family friendly fundraising walk, which will raise money to provide help and hope to everyone affected by dementia. Everyone is welcome to take part, and registration is free. Walkers can sign up on our website, and will receive a fundraising pack and t-shirt in the post. Key dates for the event are: Set up – 7am to 10am Main Event – 10am to 3pm De-Rig 4.30pm
3.6	On the day there will be an event site, where there will be a food and drink caterer, an information stand, a merchandise stand, our Memory Tree and our stage with a Zumba warm up. There will be a long and short route around the park, meaning there will be something to suit everyone.
3.7	Donations are welcome on the day and will be collected in buckets across the stands. Their charity number is 296645.
3.8	**Parkinson's Walk – Botanic Gardens Saturday 6 July 2024** Gladiator events have requested the use of Botanic Gardens to host a charity walk to raise money for Parkinson's UK. The purpose of the event is to not only to raise funds for Parkinson's UK but also to educate people on Parkinson's along with connecting those who are affected by the disease. They have requested access to the site a day prior to set up the event village. Key dates for the event are: Set Up – 1pm to 6pm Friday 5 July Main Event – 10am to 4pm De Rig – 6pm
3.9	Walk for Parkinson's. A 2 or 6 mile walk for supporters of the charity, with all proceeds going to the charity. The two mile walk needs to be fully accessible, on paved footpaths or tracks, as it is designed to be suitable for those living with Parkinson's.
3.10	**Ulster University Belfast 5km Festival – Cathedral Garden Sunday 9 June 2024** Ulster University is hosting the Belfast 5km & Mile event on Sunday 9 June and have requested the use of Cathedral Gardens as a hub for the event. The race portion of the event will feature world champion Joshua Cheptegei's and is expected to bring in over 5000 attendees.

3.11	The Cathedral Gardens portion of the event will feature as a Pre & Post event meet and great area and will feature live music being performed by local artists along with food and drink vendors to supply food to the attendees. They also request to have an art display on show that has been created by the Ulster University students. Key dates for the event are: Set Up – 6am Main Event 9am to 2pm De-Rig – 4pm
	ASG Concert – C.S. Lewis Square Friday 19 July 2024
3.12	ASG & Partners have requested the use of C.S. Lewis square to host a concert featuring Sophie Ellis – Bextor. The Event organiser is hoping to orchestrate an intimate disco house setting featuring Sophie Ellis-Bextor as the headline artist and complemented by performances from local Northern Irish DJs. Key dates for the event are: Set Up – Friday 19 July – 9am Main Event - 5pm to 11pm De-Rig Saturday 20 July – 11am
3.13	The event organiser has already tied in with Eastside Partnership who are in favour of the event and have offered to support it.
	Finaghy Cultural Festival – Wedderburn Friday 16 August 2024
3.14	Finaghy Cultural Festival is organised by a small group of local people from the community who started out through the first lockdown back in March 2020 as a foodbank helping the elderly and vulnerable through very difficult times. They then started up a residents group volunteering and organizing events for the community.
3.15	They will have a bar serving alcohol so a drinks license will be in place. The committee have had meetings with their local community, police and have been awarded funding to run the event. Activities throughout the day include – live music, food vendors, amusement & fairground rides. The group also plan on having a BBQ on site. This event has taken place in previous years with no issues. Key dates for the event are: Set Up – 12pm – Thursday 15 August Main Event – 4pm to 6pm – Friday 16, Saturday 17 & Sunday 18 August 2024 De-Rig – 1.30pm Monday 19 August
	EID Festival – Botanic Gardens Saturday 27 July 2024
3.16	Belfast City Council has received a request from Zoreena Ahmed to host an EID festival in Botanic Gardens on Saturday 27 July. The event is aimed at celebrating the Muslim Community in Northern Ireland but is open to the wider public to promote diversity and integration.
3.17	The event will have number of food stalls providing hot and cold options with an ethnic flavour attached. There will be no charge for the event, and it will be free to attend. All children's rides will be free to use. There will be a small cost if families wish to purchase food and other activities. The event is designed to help and support families who cannot afford days out with the events Motto being "How We Gather, Is How We Live"!

	Key dates for the event are: Set Up – 7am Main Event – 12am to 6pm De-Rig – 8pm
3.18	**Darkness into Light – Ormeau Park – Saturday 11 May 2024** Belfast City Council has received a request from PIPS Suicide prevention for the use of Ormeau Park to host their annual Darkness into Light Walk. Darkness into Light walk is a pre dawn walk around the 5 kilometer track in Ormeau Park. This event is in conjunction with a sister charity Pieta House based in ROI. Each year the walk provides an opportunity for people to connect with their local community and to bring hope to people who have been impacted by suicide. PIPS Charity the organiser and beneficiary of this walk are a local charity who provide support and counselling to people affected by mental unwellness, suicide and self-harm. Key dates for the event are: Set-up – Friday 10 May 2024 – 9am Main Event – Saturday 11 May – 4.15am to 9am De-Rig – Saturday 11 May – 9am
3.19	The event is due to take place out of hours and will use the main paths around the park for the 5km walk. No money will be collected on site as registration is completed online prior to the event. It is anticipated that there will be between 500 and 1000 people attending.
3.20	**Financial and Resource Implications** There are no known financial or resource implications with these requests.
3.21	**Equality or Good Relations Implications/Rural Needs Assessment** There are no known implications.
4.0	**Appendices - Documents Attached**
	None.

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Belfast City Council

PEOPLE AND COMMUNITIES COMMITTEE

Subject:	Woodvale Park MUGA Upgrade
Date:	12th March 2024
Reporting Officer:	David Sales, Strategic Director of City and Neighbourhood Services
Contact Officer:	Stephen Leonard, Neighbourhood Services Manager

Restricted Reports				
Is this report restricted?	**Yes**		**No**	**x**
If Yes, when will the report become unrestricted?				
After Committee Decision				
After Council Decision				
Some time in the future				
Never				

Call-in				
Is the decision eligible for Call-in?	**Yes**		**No**	

1.0	**Purpose of Report or Summary of main Issues**
1.1	To update members on progress towards the upgrade of the Woodvale Park MUGA to an artificial pitch and to seek approval to formalise a relationship with Shankill Juniors FC for the delivery of sports development outcomes at the site.
2.0	**Recommendations**
2.1	It is recommended that members agree to Shankill Juniors FC becoming the IFA affiliated sports outcomes delivery partner for the new pitch at Woodvale Park.
3.0	**Main report**
3.1	**Key Issues** At the Strategic Policy and Resources Committee held on 21 April 2023, Members approved an application to the IFA DCMS Grass Roots Funding scheme for the upgrade of

	the polymeric MUGA at Woodvale Park to a 7-a-side artificial pitch. The application has been successful and £120,000 has been awarded subject to the conditions of funding. The match funding element was agreed by Strategic Policy and Resources Committee and is to be met from a ringfenced amount already allocated by the AWG from Social Outcomes Fund for the improvement of the MUGA.
3.2	The IFA DCMS funding conditions state that where the applicant is not a soccer club, as in the case of the Council, the funding offer is conditional on the applicant demonstrating a partnership with an Irish FA affiliated local 'partner' football club which, in the words of the funder: "*will subsequently become that facility's 'anchor' club for significant football development activities."*
3.3	The SMART targets submitted as part of the application process were based on a development plan put forward by Shankill Juniors FC who satisfy the criteria above. Members are therefore being asked to approve a formal relationship with the club as the sports development partner at the site. This is needed in order to secure the £120k funding. Officers will then work with the club to agree a development programme which the IFA will then periodically monitor to confirm outcomes.
3.4	Colleagues in Property and Projects have advised that procurement of a contractor is underway with the aim of completing the project by early summer. If members are in agreement with Shankill Juniors FC being the sports development partner, officers would expect to engage with the club across a period of several weeks to confirm that the programme of activities will be in place for handover of the pitch. It is understood the club have aspirations to take on aspects of the operation of the site. Officers will work to identify and allocate roles and responsibilities associated with the management of the new pitch as appropriate to the club's capabilities but as a minimum the club will be expected to take a keyholding role for changing facilities and to manage the bookings for the pitch.
3.5	**Financial & Resource Implications** The match funding element of capital costs is already ringfenced within the Social Outcomes funding stream. As no revenue budgets currently exist to support delivery of the SMART targets associated with the funding award it is proposed that the club manage pitch bookings and retain the income as a means of financing the sports development activities. Should the club be in a position to maintain the pitch officers will seek to realign current resources to reimburse the club.
3.6	**Equality or Good Relations Implications/Rural Needs Assessment** There are no Equality or Good Relations Implications /Rural Needs Assessments associated with this report.
4.0	**Appendices**
	None

Belfast City Council

PEOPLE AND COMMUNITIES COMMITTEE

Subject:	Blanchflower Pitch 2 Preferential Use Agreement
Date:	12 March 2024
Reporting Officer:	David Sales, Strategic Director of City and Neighbourhood Services
Contact Officer:	Paddy McGrattan, Leisure Development Manager

Restricted Reports				
Is this report restricted?	**Yes**		**No**	X
If Yes, when will the report become unrestricted?				
After Committee Decision				
After Council Decision				
Some time in the future				
Never				

Call-in				
Is the decision eligible for Call-in?	**Yes**	X	**No**	

1.0	**Purpose of Report or Summary of main Issues**
1.1	The purpose of this report is to inform Members of this Committee that the Preferential Use Agreement with Glentoran Football Club for the use of the second synthetic pitch at Blanchflower Playing Fields, expired on 1 December 2023.
1.2	Outside the timeslots allocated to Glentoran the facility is very popular and continues be fully booked from 6pm to 10pm Monday to Thursday by a wide range of youth and senior teams.
1.3	On Friday evenings along with Saturday mornings and on Sunday the pitch is booked by South Belfast Youth League
1.4	Council have been approached by several local, community based clubs who are unable to gain access to the pitch.
1.5	There are a number of options for Council to consider regarding the future booking arrangements for this pitch:

	Option 1 To renew the Preferential Use Agreement with Glentoran Football Club **Option 2** To process all pitch bookings at the site following normal Belfast City Council procedures which is first come, first served. **Option 3** To work with local community based football clubs to develop an allocation model so that they all get access to the pitch on Monday to Thursday evenings. An example of a potential allocation model involving 8 clubs and the South Belfast Youth League is included at appendix 1
2.0	**Recommendations**
2.1	The Members of the Committee are asked to note that the Preferential Use Agreement with Glentoran Football Club for Blanchflower Playing Fields has ended
2.2	From 1 April 2024 it is suggested that Council should progress with Option 3. Council Officers with meet with local clubs to develop an allocation model so that they all get access to the pitch on Monday to Thursday evenings (see appendix 1)
3.0	**Main report**
	<u>Background</u>
3.1	In March 2018 Strategic Policy and Resources Committee directed officers to undertake research into the provision of suitable and convenient pitch facilities for Glentoran FC including its Youth Academy. Committee further accepted the East Area Working Group recommendation that a proposed capital programme to install a 3G pitch with floodlighting at King George V playing fields be replaced on the capital programme with a 3G pitch at Blanchflower Playing Fields.
3.2	People and Communities Committee of March 2019 agreed to upgrade facilities at King George V Playing Fields and offer a preferential Use Agreement for 5 years to Glentoran Youth Academy.
3.3	King George V playing fields are subject to a Deed of Covenant with Fields of Trust. Local residents had written to Fields in Trust in opposition to the proposed development of the site and management of bookings. Local residents also approached council officers protesting against the proposal on a number of grounds.
3.4	In the meantime significant investment in football facilities had taken place in East Belfast and in particular at Blanchflower Playing Fields where Council has developed two full size floodlit synthetic football pitches at Blanchflower Playing Fields. One of the pitches being directly managed and booked by Harland and Wolff Welders Football Club and the other managed and booked by Council
3.5	By 2019 the decision regarding the upgrade works had not been fulfilled approved Preferential Use Agreement at King George V Glentoran FC wrote to Council seeking approval for the previously approved Preferential Use Agreement at King George V playing fields to be transferred to Blanchflower playing fields.
3.6	Officers negotiated with Glentoran Football Club and an agreed timetable of priority use for Glentoran Football Club was produced, indicated in the table below. The timetable of use and the teams/sections from within the club using the pitch at these times were to be

reflective of Glentoran Football Clubs commitment to growing the game in an inclusive way with significant usage by groups under-represented in sports participation.

Day	Times of Use
Monday	6:00pm-7:00pm 7:00pm -8:00pm
Tuesday	6:00pm-7:00pm 7:00pm -8:00pm
Wednesday	6:00pm-7:00pm 7:00pm -8:00pm
Thursday	6:00pm-7:00pm 7:00pm -8:00pm
Friday	None
Saturday	None
Sunday	None

3.7 People and Communities Committee of 9 November 2021 agreed to offer a Preferential Use Agreement to Glentoran Football Club at Blanchflower Playing Fields for limited access to the site, as identified in the table above, for a period of two years. This agreement has now ended and there have been enquiries from a number of local youth teams with regards to being able to book this pitch for the slots currently allocated to Glentoran through this agreement.

3.8 **Financial & Resource Implications**
There are no additional resource implications associated with this report.

3.9 **Equality Impact/Rural Needs Assessment**
There are no equality or rural needs implications associated with this report.

4.0 Appendices – Documents Attached

Appendix 1 Model Pitch Bookings Blanchflower Pitch 2

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Day	Start Time	End Time	Club Name
Saturday	09:00	13:00	SOUTH BELFAST YOUTH LEAGUE
Sunday	10:00	16:00	SOUTH BELFAST YOUTH LEAGUE
Monday	18:00	19:00	Club 1
Monday	19:00	20:00	Club 2
Monday	20:00	21:00	Club 3
Monday	21:00	22:00	Club 4
Tuesday	18:00	19:00	Club 5
Tuesday	19:00	20:00	Club 6
Tuesday	20:00	21:00	Club 7
Tuesday	21:00	22:00	Club 8
Wednesday	18:00	19:00	Club 1
Wednesday	19:00	20:00	Club 2
Wednesday	20:00	21:00	Club 3
Wednesday	21:00	22:00	Club 4
Thursday	18:00	19:00	Club 5
Thursday	19:00	20:00	Club 6
Thursday	20:00	21:00	Club 7
Thursday	21:00	22:00	Club 8
Friday	18:00	22:00	SOUTH BELFAST YOUTH LEAGUE

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Belfast City Council

PEOPLE AND COMMUNITIES COMMITTEE

Subject:	Former Upper Ardoyne Youth Centre Tenancy Options
Date:	12th March 2024
Reporting Officer:	David Sales - Strategic Director of City and Neighbourhood Services
Contact Officer:	Stephen Leonard - Neighbourhood Services Manager Jacqui Stewart - Assets and Facilities Management co-ordinator

Restricted Reports				
Is this report restricted?	**Yes**		**No**	x
If Yes, when will the report become unrestricted?				
After Committee Decision				
After Council Decision				
Some time in the future				
Never				

Call-in				
Is the decision eligible for Call-in?	**Yes**		**No**	

1.0	**Purpose of Report or Summary of main Issues**
1.1	To advise members of the responses to an Expression of Interest process in respect of an opportunity to rent the vacant premises formerly used as the Upper Ardoyne Youth Centre.
1.2	To obtain member agreement as to the expression of interest best suited to serve the needs of the community in the area and a recommendation to SP+R Committee for the grant of a lease to the successful applicant organisation.
2.0	**Recommendations**
2.1	That a recommendation is made to Strategic Policy and Resources Committee that Streetbeat Youth Project are recommended as lessee for the vacant premises formerly known as Upper Ardoyne Youth Centre with lease terms to be drawn up by estates officers and reported through SP+R for approval.

3.0	Main report

3.1 The Council entered into an Agreement for Lease with the organisation "Upper Ardoyne Youth Centre" in 2007 to facilitate construction of a Community Centre and Community Garden on land owned by the Council. The Company constructed the youth centre using funding provided under Urban ll through the former North Belfast Partnership. The facility comprises a single storey brick building laid out to provide partitioned meeting room, office, youth room and ancillary facilities, together with external yard space and grassed area. It is located on the South East boundary of Ballysillan Park at Alliance Drive. UAYC was dissolved as a company in 2013 and the building reverted to council ownership in 2017.

The North AWG identified community and voluntary sector use as their preference for the building and officers from Estates and City and Neighbourhood Services have since 2018 run a number of exercises to secure a tenant but, despite interest, the building has remained vacant. A further opportunity was publicised to the community and voluntary sector in December 2023 and two parties have put forward expressions of interest.

3.2 <u>Key Issues</u>
The two organisations expressing interest in the building are;

- **Wee Chicks**, a provider of childcare for children aged 0 to 11. Currently operating in a building in Chichester Avenue providing places for 20 children. A move to the UAYC building would see capacity expand to 28 children.
- **Streetbeat Youth Project**, a voluntary organisation working with young people aged 11-25 in North Belfast, with a particular focus on the Greater Shankill and Ballysillan areas. The organisation currently deliver programmes in a variety of premises including a number of local schools.

3.3 As both applicants satisfy the essential criteria, decision making can best be supported by considering the nature of the services to be provided from the building and the potential community benefit. The information below is summarised from their submissions.

Wee Chicks	Streatbeat
Service offering: Expanded after schools programme. Creche service. Forest school programme. Educational and parental support initiatives. Partnerships with local primary schools. Hire of rooms	**Service offering**: Youth programmes: Ballysillan focused programmes will be based here including: Daytime school groups Mentoring Group work day/evening Drop in day/evening Outdoor adventure programmes Diversionary programme delivered in park by youth worker on site.
Hours of Operation 9.45am – 5.30pm 5 days a week Holiday camps Saturday morning Forest Schools Evening wellbeing classes.	**Hours of Operation** 5 days per week including evenings
Community Benefits Focus on making a meaningful difference in the lives of local parents and children.	**Community Benefits** Improved youth confidence and self esteem

	All round development of local children, offering programmes that bolster emotional, social, and cognitive skills. parenting courses and workshops designed to provide parents with the skills and knowledge they need to create nurturing environments at home.	Increased community engagement Upskilling of local residents and improved employability Increased resilience and coping skills Reducing ASB Improved educational attainment and school attendance Personal and social development Improved mental health and wellbeing Training opportunities Volunteering opportunities

3.4 The full submissions were reviewed by CNS Departmental Asset Board. Officers are recommending elected members consider Streetbeat Youth Project as the preferred applicant. This is based on their potential to deliver a wider benefit for the local community and on their potential to utilise the adjacent Ballysillan Park to maximise on diversionary activities to reduce the negative impacts of ASB on the community.

Financial & Resource Implications

3.5 A current rental valuation is being sought from LPS by colleagues in the Estates Unit and the rent will represent new revenue income.

3.6 Given the premises have been vacant for some considerable time the Property Maintenance unit have been asked to assess and value the works needed to ready the property for a tenant.

Equality or Good Relations Implications/Rural Needs Assessment

3.7 None.

4.0	**Appendices**
	None

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PEOPLE AND COMMUNITIES COMMITTEE

Belfast City Council

Subject:	Belfast City Council – Probation Board for N Ireland (PBNI) partnership working (Allotments maintenance)
Date:	12th March 2024
Reporting Officer:	David Sales - Strategic Director of City and Neighbourhood Services
Contact Officer:	Stephen Leonard - Neighbourhood Services Manager

Restricted Reports

Is this report restricted? **Yes** [ ] **No** [x]

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number [ ]

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	[ ]
After Council Decision	[ ]
Sometime in the future	[ ]
Never	[ ]

Call-in

Is the decision eligible for Call-in? **Yes** [x] **No** [ ]

1.0	**Purpose of Report/Summary of Main Issues**
1.1	To seek permission from Committee to implement a Memorandum of Understanding (MOU) with the Probation Board of Northern Ireland (PBNI) to provide a maintenance support service for allotment users.
2.0	**Recommendation**
2.1	Committee is asked to approve the attached MOU and to give permission for its implementation.
3.0	**Main Report**
3.1	Open Spaces and Streetscene officers have held meetings with PBNI to explore the possibility of working in partnership to provide maintenance services for allotment users. The pilot initiative will focus on the Annadale site. The MoU attached at appendix A is the practical outworking of those discussions. The committee is asked to approve the MoU, which would allow officers to begin its implementation.
3.2	The Council has a long-established partnership in place with the PBNI through the provision of its graffiti removal service. This partnership is facilitated under a similar MoU arrangement to the one proposed herein. We are keen to build on this relationship in order to provide support to both existing and new allotment users, with the focus initially on our Annadale site.
3.3	Primarily the support by PBNI will be aimed at supporting those plot holders who are unable, for a variety of reasons e.g. sickness, are unable to manage their own plots at the time being. The plots will be agreed with the allotment committee and holders in advance of any works being carried out.
3.4	Proposed works undertaken as part of this MoU by the PBNI team will include: - Work to manage and maintain individual plots, where the plot holder is currently unable to manage the plot themselves due to temporary illness; - Work to manage and maintain those plots that have not been allocated for a long period of time due to being in a state of disrepair and therefore, unattractive to any new tenant. - Work to manage and maintain common areas and internal hedges (this would normally be the responsibility of the allotment holders).

3.5	Work will be carried out one day per week during normal working hours. The PBNI team will be supervised by their own staff at all times when on site. It is anticipated that the programme of work will begin from 1st April 2024 and will last to September 2024. Work will be carried out one pre agreed day per week within normal working hours.
3.6	All existing allotment users will be communicated with in advance of the initiative beginning. This will be directly through our parks outreach team, and also through the Allotment committee which is fully supportive of the initiative, and will be involved in its implementation.
3.7	The MoU has been vetted by BCC Legal Services
3.8	**Financial & Resource Implications** All costs associated with the operation of this MoU will be covered by the PBNI. This will include any equipment, PPE and / or fuel costs.
3.9	**Equality or Good Relations Implications** There are no equality or good relations implications in this report.
4.0	**Appendices - Documents Attached**
4.1	Appendix A – Memorandum of Understanding

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MEMORANDUM OF UNDERSTANDING

between

The Probation Board for Northern Ireland (PBNI)

and

Belfast City Council (BCC)

Annadale Allotments

Summary/Version

Title	Memorandum of Understanding between the Probation Board for NI (PBNI) and Belfast City Council (BCC) in respect of Annadale Allotments
Partners	PBNI BCC
Date of Agreement	
Date of initial Review	
2nd review	
Asset Owner:	

Version No.	**Amendments Made**	**Authorisation**
v 0.1		
v 0.2		
v 1.0		

CONTENTS

1. Background and Context

1.1 PBNI has responsibility for the Community Service scheme, whereby offenders are required to undertake unpaid work for the benefit of communities across Northern Ireland, as directed by the Court. The aim of Community Service is for offenders to pay back to the community in a positive way for the damage caused by their offending. Every year thousands of unpaid hours of work are completed, benefiting many communities across Northern Ireland.

1.2 PBNI have an established relationship with BCC OSS service through its graffiti removal service. PBNI wish to extend this relationship to carry out work at Annadale allotments on behalf of the allotment holders, and with agreement from the OSS site staff. Primarily the support by PBNI will be aimed at supporting those plot holders who are unable, for a variety of reasons e.g. sickness, are unable to manage their own plots at the time being. The plots will be agreed with the allotment committee and holders in advance of any works being carried out. The works involved in this scheme will be broadly limited to manual works using handheld manual tools. And electric equipment required will be used only by the team supervisor, with fuel costs being covered by the allotment committee.

1.3 It is anticipated that the programme of work will begin from 1st April 2024 and will last to September 2024. Work will be carried out one pre agreed day per week within normal working hours.

1.4 This Memorandum of Understanding is a statement of intent that does not give rise to legally binding obligations in respect of either party except where expressly stated.

2. Purpose and application

3.1 PBNI is committed to ensuring the successful maintenance of Annadale Allotments alongside BCC and Allotment Holders.

3.2 The purpose of this Memorandum of Understanding (MOU) is to clarify the relationship between the Probation Board for Northern Ireland (PBNI) and Belfast City Council (BCC) in respect of Annadale Allotments.

3.3 It provides for effective co-operation and communication between PBNI and BCC in respect of Annandale Allotments.

3. Activities

3.1 PBNI is responsible for the activities carried out by the offenders under its supervision. Any work carried out must take account of the safety of PBNI staff and service users, and such work will not be undertaken if this compromises their safety or the safety of the other allotments users.

3.2 Work undertaken as part of this MoU by the PBNI team will include:

- Work to manage and maintain individual plots where the plot holder is currently unable to manage the plot themselves due to illness;

- Work to manage and maintain those plots that have not been allocated for a long period of time due to being in a state of disrepair and therefore, unattractive to any new tenant;

- Work to manage and maintain common areas and internal hedges

3.3 Any work carried out as part of this agreement will have the prior approval, with guidance being given, by the OSS team. The PBNI supervisor will provide the OSS assistant manager with a proposed work programme two weeks in advance.

3.4 Work will be carried out one day per week during normal working hours. The PBNI team will be supervised by their own staff at all times when on site.

4. Underpinning principles

Parties will adhere to their respective policies, guidance/procedures relevant to the management of information, including data security, records management, retention and disposal arrangements and data handling.

4.1 BCC and PBNI are committed to:

- upholding the individual's rights under the Human Rights Act 1998.
- providing advice and assistance as and when required.
- ensuring relevant information exchanges are timely and accurate.
- promoting equality of opportunity.

- non-discriminatory practice in respect of gender, race, ethnicity, religious beliefs, age, disability, sexual orientation or for any other reason.
- confidentiality in respect of the information shared.
- the principle of consent and will only disclose information with consent or if the law requires it, or if the law allows it and we believe it is important to do so.
- openness and transparency.
- working with the offender to achieve best outcome for all.
- reflecting the attitudes and views of the victim, where appropriate.

5. Roles and Responsibilities

5.1 PBNI:

(i) PBNI shall provide the appropriate tools to carry out the work.

(ii) PBNI shall have access to facilities at BCC Annadale Allotments

(iii) PBNI shall ensure that the offenders are supervised at all times when they access the BCC Annadale Allotments and use the indoor facilities.

(iv) PBNI shall remain responsible for its staff and the offenders at all times while at Annandale Allotments.

(v) PBNI shall be responsible for ensuring that the correct personal protective equipment is worn by its staff and offenders at all times and replaced as and when required.

(vi) PBNI shall ensure that refresher training is provided to its staff when required.

(vii) PBNI shall ensure that its staff and the offenders have received the requisite training required to use the approved equipment and Personal Protective Equipment (PPE) before work is commenced under this MoU.

(viii) PBNI shall devise bespoke risk assessment in respect of the work to be undertaken administering this MoU.

5.2 BCC:

(i) BCC shall provide access to the allotments during the days and times agreed for carrying out the proposed work activities.

(ii) BCC Open Spaces and Streetscene team to provide guidance to the PBNI supervisor and team regarding the work activities and will agree weekly how and what work will be work will be carried out.

(iii) BCC will communicate with all plot holders at the allotments, both directly and through the allotments committee, to advise of the intention to enter into this agreement with the PBNI and provide details of when the scheme is due to begin and end, and the activities that will be carried out as part of it.

(iv) BCC shall allow access to storage and toilet facilities at Annadale allotments for the PBNI team.

(v) BCC to provide PBNI with current relevant risk assessments to inform a bespoke PBNI risk assessment to be devised by PBNI. The Council's Risk Assessment is for information purposes only and should not be relied upon.

6. Liability

This Clause is intended to be legally binding on the parties.

6.1 No liability whatsoever shall attach to BCC from the operation of this MoU and the PBNI shall be liable for all activities carried out under this MoU and PBNI shall indemnify BCC against all claims of whatever nature arising through the activities that are the subject of this MoU.

7. Costs

7.1 Any costs arising from the delivery of the agreed service will be funded by the party that incurs that cost.

7.2 Annadale allotment plot holder committee to provide petrol or funds for petrol purchased to carry out work on site.

8. Fair Processing

8.1 It is the responsibility of BCC and PBNI to ensure there Is full compliance with the legal principles set out In the General Data Protection Regulation (GDPR) 2016 (Appendix 1), the Data Protection Act 2018, the Human Rights Act 1998 and the Common Law Duty of Confidentiality insofar as they apply to the information shared under the terms of this MOU. See Appendix 1 for list of the Data Protection principles.

8.2 To ensure compliance with the Data Protection Act, and noting principle 1 (Fairness & Lawfulness), BCC and PBNI will make the Annadale Allotment committee members and plot holders aware of the service. A full explanation of the service and the involvement with PBNI is included within the BCC website, and the PBNI website.

9. Information Sharing

9.1 The lawful basis for processing this personal data, including its sharing, is found within article (Article 5(1) of the General Data Protection Regulation (appendix 1)), i.e. the data subject has given their consent to the processing. No sensitive personal data will be shared as part of this MoU.

9.2 Consent is always an overriding factor when sharing personal data.

10. Staff Awareness

10.1 PBNI will ensure that members of their staff who are involved in this service will have adequate training regarding their responsibilities and obligations imposed by this MOU.

11. Monitoring and review

11.1 The signatories for each party (para 15) will have responsibility for monitoring the pilot and operation of this memorandum. Monitoring will be ongoing throughout the pilot period and the memorandum will be reviewed initially after 12 months (March 2025). Any changes to the Memorandum must be agreed by each party in writing.

12. Termination

12.1 The MoU may be terminated by either party at any time by giving one months' notice in writing.

13. Freedom of Information

13.1 PBNI and BCC are subject to the Freedom of Information Act 2000 and Environmental Information Regulations 2004 and, as such. may be obliged to release details of this Memorandum of Understanding on request.

14. Signatories

Responsibility for the operation of this Memorandum and providing assurances that the underpinning principles, policies and procedures (section 5) are being adhered to rests with the following signatories:

For PBNI

Name: _____

Position: Assistant Director

Signature: _____ Date: …../……../……

For BCC

Name: _____

Position: Director of City and Neighbourhood Services Department

Signature: _____ Date; **…**…/……../……..

16. <u>Date of Implementation</u> ?? March 2024

The Data Protection Principles

(Article 5(1) of the General Data Protection Regulation)

1. Personal data shall be:

   a. Processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness. fairness and transparency');

   b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');

   c. Adequate, relevant and limited to what is necessary In relation to the purposes for which they are processed ('data minimization'},

   d. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate. having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

   e. Kept In a form Which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical I purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject ('storage limitation');

   f. Processed in a manner that ensures appropriate security of the personal data. including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

PEOPLE AND COMMUNITIES COMMITTEE

Belfast City Council

Subject:	Donations to Societies for Contributions to the Spring Fair & Autumn Fair Events
Date:	12th March 2024
Reporting Officer:	David Sales, Director of Neighbourhood Services
Contact Officer:	Stephen Leonard, Neighbourhood Services Manager

Restricted Reports

Is this report restricted? **Yes** [ ] **No** [x]

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number [ ]

1. Information relating to any individual.
2. Information likely to reveal the identity of an individual.
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained.
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction.
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	[ ]
After Council Decision	[ ]
Sometime in the future	[ ]
Never	[ ]

Call-in

Is the decision eligible for Call-in? **Yes** [x] **No** [ ]

1.0	**Purpose of Report/Summary of Main Issues**
1.1	The purpose of this report is to seek approval from Members to continue the payment of donations to Horticultural Societies for their contributions to parks events, from 2023 – 2025 inclusive.
2.0	**Recommendation**
2.1	The Committee is asked to: • Note the contents of the report. • Approve an annual £200 contribution to each of the Societies listed below from 2023 – 2025 inclusive.
3.0	**Main Report**
	Key Issues
3.1	Members are reminded that the Council has, in the past, authorised the payment of £200 donations to Societies involved in the Spring Fair and Autumn Fair for their contribution and recognition towards the flower show element they provide at some of the annual events organised by the Parks Events & Outreach Unit.
	Payment of Donations
3.2	The Parks Events Team organises the Spring Fair and Autumn Fair which in 2019 was attended by almost 29,400 visitors and incorporated horticultural displays, children's entertainment, food stalls, workshops and music. An integral part of both events are the flower show elements and the Parks Events & Outreach team work in partnership with the two flower show committees during the year to plan the shows.
3.3	The committees now include representatives from: the Northern Ireland Daffodil Group; Belfast and District Beekeepers' Association; Belfast Winemakers' Circle; British Cactus and Succulent Society; Federation of Women's Institutes of Northern Ireland; Irish Fuchsia and Pelargonium Society; North of Ireland Dahlia Society; Northern Ireland Bonsai Society; Northern Ireland Group of Flower Arrangement Societies; Northern Ireland Vegetable Association and The Rose Society of Northern Ireland.
3.4	The annual individual £200 contributions are normally issued to each of the Societies involved after each event has taken place in recognition of their valuable role and significant level of voluntary involvement that will be required from them during the next three years.
3.5	The Council seeks to reinforce its partnerships with the various horticultural societies, organisations and stakeholders. Most of these partnerships have been forged over many years and without that support and goodwill, the continued success of such events could be undermined.
	Financial and Resource Implications
3.6	£2,200 has been allocated in the revenue estimates for donations. Each one of the 11 societies will receive the £200 donation provided they participate/attend in the Flower Shows.
	Equality or Good Relations Implications/Rural Needs Assessment
3.7	There are no known implications.
4.0	**Appendices - Documents Attached**
	None

Belfast City Council

Subject:	George Best Belfast City Airport request to facilitate ongoing greylag goose control at Victoria Park
Date:	12 March 2024
Reporting Officer:	David Sales, Strategic Director of City and Neighbourhood Services
Contact Officer:	Stephen Leonard, Neighbourhood Services Manager

Restricted Reports				
Is this report restricted?	**Yes**		**No**	X
If Yes, when will the report become unrestricted?				
After Committee Decision				
After Council Decision				
Some time in the future				
Never				

Call-in				
Is the decision eligible for Call-in?	**Yes**	X	**No**	

1.0	**Purpose of Report**
1.1	The purpose of the report is for Members to consider a request from George Best Belfast City Airport (GBBCA) to continue the ongoing greylag goose control programme at Victoria Park through a 3-year legal agreement.
2.0	**Recommendations**
2.1	Members are asked to: i. Note the report from GBBCA on Greylag Geese Management at Victoria Park, ii. Consider permissions requested to enter Victoria Park to facilitate the continuation of pricking of un-hatched greylag goose eggs under licence issued by the Northern Ireland Environment Agency (NIEA); and iii. Instruct officers to work with legal services to issue a relevant licence for a period of 3 years which will be subject to annual review in advance of renewal.

3.0	**Main report**
3.1	Members are aware that control of birds in the flight path to the airport is a requirement of the airport's Civil Aviation Authority licence.
3.2	The GBBCA bird control programme has been underway for a number of years and is underpinned by scientific surveys and research. Council previously agreed a range of measures to control greylag goose numbers within Victoria Park including habitat modifications, dissuading members of the public from feeding the birds and annual egg pricking under licence. Management interventions are monitored by GBBCA to assess their effectiveness.
3.3	A report provided by GBBCA (See Appendix 1) provides information on how the control programme, aimed at making the site less attractive to geese, has been effective with a steady decline in numbers. Egg control at Victoria Park over the last licences period averaged 68.3 eggs per year compared to 74.4 for the previous three year period (2018 – 2020), with a corresponding drop in monthly average count from 18.3 to 10.5. This continuing decline in numbers at the park is mirrored by a decline in runway observations Appendix 1 (Table 1 and Figure 2).
3.4	It reports that although there is an overall declining trend for greylag geese in the area, runway observations still record peaks during Spring and Autumn while at Victoria Park numbers have increased sharpy over the last six months. The report also states that at a national level numbers of greylag geese are also increasing.
3.5	The report concludes that with greylag longevity c.20 years, seasonal peaks still evident from runway observations and a recent increase in greylag at Victoria Park, the recommendation to continue with egg control management is well-founded. The recent rise in numbers at Victoria Park however, introduces trend instability which along with a risk of displacement from other sites, would suggest any cessation of management effort in the short-term would be premature.
3.6	On this basis, GBBCA has approached council to request continued access to Victoria Park to facilitate the continuation of pricking of un-hatched greylag goose eggs under licence issued by the Northern Ireland Environment Agency (NIEA).
3.7	If members are content, officers will work with Legal Services to issue a relevant licence for a period of three years which will be subject to annual review in advance of renewal.
3.8	To support the review, GBBCA will be required to submit an annual report outlining their Wildlife Control Management Plan (WCMP) noting recommendations based on the risk assessment made in the annual Wildlife Hazard Assessment (WHA) and incorporating any new control methods as they become available.
3.9	Officers will review the submitted risk assessment and insurance certificates in line with procedure. The licence will include relevant conditions to ensure that health and safety measures are implemented, and that any other necessary arrangements are put in place.
3.10	Members will recall that at it's January 2024 meeting, members agreed to a request from GBBCA agreed to the request from George Best Belfast City Airport to permit access under licence to Victoria Park to facilitate rookery management, in particular, the removal of old rook nests and nest site discouragement during January 2024. The Committee agreed that the Council write to George Belfast City Airport asking it to clarify if it was seeking to reduce

	and manage the number of rooks at Victoria Park or to ultimately eradicate them from the area.
3.11	GBBCA responded on 1 March 2024 (copy attached at Appendix 2) to advise that due to high strike posed to aircraft by rooks, that they have a legal responsibility to safeguard the airport and surrounding areas from flocks of birds which could pose such a risk. To attempt to prevent year on year expansion, they are using habit manipulation techniques to discourage rather than prevent breeding altogether in order that rooks and their young may in time naturally find an alternative location – these techniques are only progressed following consultation with subject matter experts and obtaining the necessary permissions, with work undertaken by qualified personnel.
3.12	GBBCA have offered to meet with members in Victoria Park for an overview, if interested.
3.13	<u>Financial & Resource Implications</u> GBBCA will be responsible for all costs associated with the request.
3.14	<u>Equality or Good Relations Implications/Rural Needs Assessment</u> None
4.0	**Appendices**
	Appendix 1: Greylag Management at Victoria Park, Belfast Summary Report for Management Agreement 2021-2023. Appendix 2 – Copy of response received from GBBCA on 1 March 2024

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Greylag Management at Victoria Park, Belfast

Summary Report for Management Agreement 2021-2023

Between Belfast City Airport & Belfast City Council

Kerry Mackie 14/2/2024

Summary

- Aircraft strike by greylag remains at "medium risk".
- Overall greylag observations on the airport runways and Victoria Park continues to fall but peaks remain during the breeding season and during autumn.
- Recently numbers of greylag at Victoria Park have increased.
- National numbers of naturalised (feral) greylag are increasing. (BTO Waterbirds in the UK 2021/22 WeBS Report online)
- Developments in other Belfast Parks are likely to increase unpredictability.
- Feeding by the public has been reduced (a key objective) however, grass pitches remain available as a food source.
- As greylag are a long-lived and mobile species, egg control - as a low-profile intervention - requires a long-term commitment.
- To ensure continuing efficacy and with agreement with BCC in 2023, the next licence to include June for late clutching.

George Best Belfast City Airport (BCA) Responsibilities

Aerodromes subject to the UK Civil Aviation Authority's (CAA) national aerodrome licencing requirements use the guidance material presented in CAP772: Wildlife Hazard Management at Aerodromes (CAA 2017) to demonstrate a means of compliance to requirements stated in CAP 168: Licensing of Aerodromes (CAA 2019). The content of CAP772 is provided as information, specialist advice and supplementary guidance material in support of EC Regulation 139/2014 and associated (EASA) Acceptable Means of Compliance and Guidance Material.

All sites chosen for airfields have associated air safety risks due to local bird populations and their movements. The area occupied by the airfield will attract a range of bird species, depending on the habitat types present both on the airfield and nearby. On-airfield conditions will determine which species use the immediate areas around the runways and are carefully managed. Bird strike risks in the airspace above and the flightlines around the airfield are affected by the distribution of habitats on a broader scale. On-airfield, birds can be controlled by a range of methods including habitat management and disturbance. The measures employed at George Best Belfast City Airport (BCA) to control birds visiting the airfield are presented in the Wildlife Control Management Plan (WCMP). The plan is reviewed annually to include recommendations made in the annual Wildlife Hazard Assessment (WHA) and to incorporate new control methods as they become available.

Table 1. is extracted from BCA's Wildlife Control Management Plan 2022/23 highlighting the continued "medium" risk status of greylag geese based on species probability x severity ratings. Table 2 and Figure 1. Illustrate recent annual and seasonal observations outlining a continuing decline in overall annual strike risk but with seasonal peaks in Spring and Autumn that may reduce if breeding reduces further.

Species	Total	5-year Frequency	Probability	Severity	Risk
Greylag goose	0	-	Very Low	Very High	Medium
Mallard	0	-	Very Low	High	Medium
Mute swan	0	-	Very Low	Very High	Medium
Shelduck	0	-	Very Low	High	Medium

Table 1. Wildfowl risk table extracted from BCA Wildlife Control Management Plan for 2022/23

Year	No. of individuals	No. of records
2014	2,426	179
2015	1,530	117
2016	5,786	234
2017	957	85
2018	318	49
2019	474	47
2020	503	34
2021	390	45
2022	209	50

Table 2 Annual airfield observations for greylag 2014-2022.

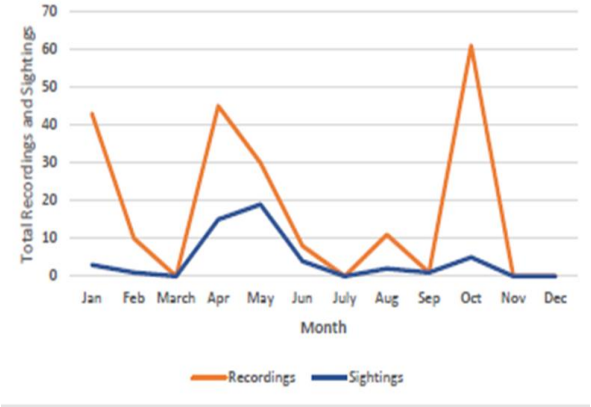

Figure 1. Monthly occurrence of **airfield** greylag sightings for 2022. (Extracted from BCA Wildlife Control Management Plan for 2022/23. Recordings = no. of individuals recorded; Sightings = no. of occasions encountered)

Greylag Management at Victoria Park

Egg control at Victoria park over the last licensed period averaged 68.3 eggs per year compared to 74.4 for the previous three-year period (2018-2020) with a corresponding drop in monthly average greylag count from 18.3 to 10.5. This continuing decline in numbers at the park is mirrored by a decline in runway observations (Table 2. & Figure 2.)

Figure 2 Greylag egg control and combined annual goose numbers using Victoria Park 2007-2023.

Future Greylag Management Victoria Park

Although there is an overall declining trend for greylag in the area, runway observations still record peaks during Spring and Autumn while at Victoria Park numbers have increased sharply over the last six months particularly when compared to the same period the previous year (Figure 3). With greylag relatively long-lived and a metapopulation reservoir within the Greater Belfast area from which to recruit, egg management remains necessary if lower numbers are to be sustained.

Wetland Bird Counts (WeBS) coordinated by the BTO record an increasing national trend for greylag in Northern Ireland, but don't necessarily cover all known goose haunts or count during months before the Icelandic breeders arrive to mix with the naturalised population. In 2024 BCA will repeat a greylag moult census between Bangor and Cave Hill to provide an update on current numbers, previously recorded at between 550-600 geese in 2019.

Figure 3. Recent increase in greylag numbers at Victoria Park

Conclusions

With greylag longevity c.20 years, seasonal peaks still evident from runway observations and a recent increase in greylag at Victoria Park, the recommendation to continue with egg control management is well-founded. The recent rise in numbers at Victoria Park however, introduces trend instability which along with a risk of displacement from other sites, would suggest any cessation of management effort in the short-term would be premature.

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From: Michael McDowell <Michael.McDowell@bca.aero>
Sent: 01 March 2024 15:28
To: Sara Steele <SteeleSara@BelfastCity.gov.uk>
Cc: Jill Thompson <ThompsonJ@BelfastCity.gov.uk>
Subject: [EXTERNAL]RE: Correspondence from BCC People and Communities Committee

Sara

Thanks for your email regarding wildlife management.

Rooks have propensity to form large rookeries which pose a high strike risk to aircraft.

Belfast City Airport has a legal responsibility to safeguard the airport and surrounding areas from flocks of birds which could pose a risk to aircraft.

At Victoria Park we are attempting to prevent year on year expansion using habitat manipulation to discourage rather than prevent breeding altogether and that rooks (and their young) may in time naturally find an alternative location.

These works are only progressed after consulting with subject matter experts and obtaining the necessary licenses and permissions. The work is undertaken by suitably qualified personnel.

If any committee members would like to meet with myself in Victoria Park for an overview, I would be pleased to arrange this.

Best regards,
Michael

Michael McDowell
Airfield Operations Manager
Michael.McDowell@bca.aero
077 3933 1815

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Belfast City Council

PEOPLE AND COMMUNITIES

AGENDA ITEM : PROPOSALS FOR DUAL LANGUAGE STREET SIGNS

Subject:	**Proposals for dual language street signs**
Date:	12th March, 2024
Reporting Officer:	Kate Bentley, Director of Planning and Building Control
Contact Officer:	Ian Harper, Building Control Manager, ext. 2430 Roisin Adams, Property and Legal Coordinator, ext. 2454

Restricted Reports

Is this report restricted? **Yes** [ ] **No** [x]

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number [ ]

1. Information relating to any individual
2. Information likely to reveal the identity of an individual
3. Information relating to the financial or business affairs of any particular person (including the council holding that information)
4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction
7. Information on any action in relation to the prevention, investigation or prosecution of crime

If Yes, when will the report become unrestricted?

After Committee Decision	[ ]
After Council Decision	[ ]
Sometime in the future	[ ]
Never	[ ]

Call-in

Is the decision eligible for Call-in? **Yes** [x] **No** [ ]

1.0	**Purpose of Report/Summary of Main Issues**
1.1	To consider applications for the erection of dual language street signs for eight existing streets within the city.
2.0	**Recommendation**
2.1	The Committee is asked to agree to the erection of a second street nameplate in Irish at, Tullymore Walk, Innisfayle Park, Helens Wood, Brians Well Close, Hamill Grove, Holmdene Gardens, Divis, Road and Owenvarragh Park.
3.0	**Main Report**
3.1	Key Issues The Council may erect a second street nameplate in a language other than English pursuant to Article 11 of the Local Government (Miscellaneous Provisions) (NI) Order 1995.
3.2	Members are asked to consider the following applications to erect a dual language street nameplate showing the name of the street expressed in a language other than English. The second language is Irish.
3.3	

English Name	**Non- English Name**	**Location**	**Persons surveyed**
Tullymore Walk, BT11 8NA	Siúlán na Tulaí Móire	Off Tullymore Gardens, BT11	59
Innisfayle Park, BT15 5HS	Páirc Inis Fáil	Off Antrim Road, BT15	94
Helens Wood, BT17 0RY	Coill Héilin	Off Stewartstown Road, BT17	100
Brians Well Close, BT17 0XP	Clós Thobar Bhriain	Off Brians Well Road, BT17	53
Hamill Grove, BT11 8SW	Garrán Uí Ámaill	Off Glen Road, BT11	22
Holmdene Gardens, BT14 7LJ	Gairdíní Holmdene	Off Berwick Road, BT14	104
Divis Road, BT17 0NG	Bóthar Dhuibhise	Off Tornaroy Road, BT17	3
Owenvarragh Park, BT11 9BD	Páirc Abhainn Bheara	Off Andersonstown Road, BT1	170

3.4	The translations were authenticated by Queens University, the approved translator for Belfast City Council.
3.5	In accordance with the Council's policy for the erection of dual language street signs, surveys of all persons appearing on the electoral register plus owners or tenants in actual possession of commercial premises, for the above streets were carried out and the following responses were received.
3.6	**Tullymore Gardens, BT11** • 20 occupiers (33.90%) were in favour of the erection of a second street name plate.
3.7	**Innisfayle Park, BT15** • 37 occupiers (39.36%) were in favour of the erection of a second street name plate. • 14 occupiers (14.89%) were not in favour of the erection of a second street name plate. • 3 occupiers (3.19%) had no preference either way.
3.8	**Helens Wood, BT17** • 49 occupiers (49%) were in favour of the erection of a second street name plate.
3.9	**Brians Well Close, BT17** • 11 occupiers (20.75%) were in favour of the erection of a second street name plate. • 1 occupier(1.89%) was not in favour of the erection of a second street name plate.
3.10	**Hamill Grove, BT11** • 9 (40.91%) were in favour of the erection of a second street name plate.
3.11	**Holmdene Gardens, BT14** • 24 occupiers (23.08%) were in favour of the erection of a second street name plate. • 1 occupier (0.96%) had no preference either way.
3.12	**Divis Road, BT17** • 2 occupiers (66.67%) were in favour of the erection of a second street name plate.
3.13	**Owenvarragh Park, BT11** • 71 occupiers (41.76%) were in favour of the erection of a second street name plate. • 5 occupiers (2.94%) were not in favour of the erection of a second street name plate. • 3 occupiers (1.76%) had no preference either way.

	Assessment against policy
3.14	The Council's policy on the erection of a second street nameplate requires that at least fifteen percent (15%) of the occupiers surveyed must be in favour of the proposal to erect a second street sign in a language other than English, to progress to Committee for consideration.
3.15	All of the surveys listed above demonstrate compliance with the threshold contained within the Policy.
	Financial and Resource Implications
3.16	There is a cost of approximately £3,150 to cover the cost of the manufacturing and erection of the dual language street signs. The cost for these street signs has been allowed for in the current budget.
	Equality or Good Relations Implications/Rural Needs Assessment
3.17	Each application for a dual language street sign is subject to an initial assessment for any potential adverse impacts on equality, good relations and rural needs.
3.18	The initial assessments and elected member notification carried out for the eight applications being considered did not identify any potential adverse impacts to prevent the surveys being carried out.
4.0	**Appendices**
	None

Belfast City Council

PEOPLE AND COMMUNITIES

PROPOSALS FOR NAMING NEW STREETS

Subject:	**Proposals for naming new streets**
Date:	12th March 2024
Reporting Officer:	Kate Bentley, Director of Planning and Building Control
Contact Officer:	Ian Harper, Building Control Manager, ext. 2430 Roisin Adams, Property and Legal Coordinator, ext. 2454

Restricted Reports

Is this report restricted? **Yes** [ ] **No** [x]

Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted.

Insert number [ ]

1. Information relating to any individual,
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4. Information in connection with any labour relations matter
5. Information in relation to which a claim to legal professional privilege could be maintained,
6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction,
7. Information on any action in relation to the prevention, investigation or prosecution of crime.

If Yes, when will the report become unrestricted?

After Committee Decision	[ ]
After Council Decision	[ ]
Sometime in the future	[ ]
Never	[ ]

Call-in

Is the decision eligible for Call-in? **Yes** [x] **No** [ ]

1.0	**Purpose of Report/Summary of Main Issues**

1.1	To consider applications for the naming of two new streets in the city.
2.0	**Recommendation**
2.1	Based on the information presented, the Committee is required to make a recommendation in respect of applications for naming two new streets in the city, Black Ridge Meadows and Black Ridge Manor. The Committee may either: • Grant the applications, or • Refuse the applications and request that the applicants submit other names for consideration.
3.0	**Main Report**
3.1	<u>Key Issues</u> The power for the Council to name streets is contained in Article 11 of the Local Government (Miscellaneous Provisions) (NI) Order 1995.
3.2	The Council may also erect a second street nameplate in a language other than English pursuant to Article 11 of the Local Government (Miscellaneous Provisions) (NI) Order 1995.
3.3	Members are asked to consider the following applications for naming new streets in the city. The applications particulars are in order and the Royal Mail has no objections to the proposed names. The proposed new names are not contained in the Council's Streets Register and do not duplicate existing approved street names in the city.
3.4	

Proposed Name	**Location**	**Applicant**
Black Ridge Meadows	Off Monagh By Pass, BT11	Apex Housing Association
Black Ridge Manor	Off Monagh By Pass, BT11	Apex Housing Association

3.5	Apex Housing Association have advised that Black Ridge Meadows and Black Ridge Manor are derived from Divis (from Irish Dubhais 'black ridge'). The Divis mountain is situated north of the development.
3.6	The second and third choice for Black Ridge Meadows are, Black Ridge Glen and Black Ridge Row. The second and third choice for Black Ridge Manor is, Black Ridge Mews and Black Ridge Grange.
3.7	These streets contain 38 residential properties and is part of the overall housing development that is known as Glenmona. The entire Glenmona site is a new mixed use urban development which will contain over 650 social and affordable homes.
3.8	In support of their application Apex have advised that they have maintained regular communication and productive community engagement with both local councillors and the community group, Upper Springfield Development Trust. St Teresa's Primary School is located next to the southern boundary of the site and Apex worked with the School Principal and with the assistance of a local historian, they organised a competition involving Primary 6 pupils for the street naming of the site.

3.9	The developer has also applied to erect dual language street nameplates in Irish for these two streets. The applications for the English street names are being brought forward this month for addressing and wayfinding purposes. The dual language aspect of these two applications and the other street names for this development approved by committee in January and February will be brought to a future committee.
3.10	**Financial and Resource Implications** There are no Financial, Human Resources, Assets and other implications in this report.
3.11	**Equality or Good Relations Implications/Rural Needs Assessment** There are no direct Equality implications.
4.0	**Appendices**
	None

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