

WEEE in business have explicit legal responsibility

Contributed by Weeeco, 2007

Weeeco guides facilities managers through the minefield of hazardous waste regulations, the compliance options for businesses following the WEEE Regulations of July 2007 and how future costs to the economy can be reduced by planning ahead now.

What is the WEEE Directive?

What will be the environmental impact?

Protecting businesses, organisations and institutions following the introduction of the WEEE Directive into UK Law and the misunderstood Hazardous Waste Regulations of July 2005 is proving to be a complex and unwanted headache for business end users of electrical and electronic equipment.

Liabilities under UK WEEE Regulations (July 2007)

Businesses, organisations and institutions are classified as a B2B end user of non-household WEEE. "End users" are legally responsible for the environmentally sound disposal of "non-household WEEE".

Liabilities under HWR Regulations (July 2005)

Business premises producing WEEE containing hazardous waste in excess of 200kg per annum are duty bound to register these with the Environment Agency and complete Standard or Multi Consignment Notes for the disposal of all WEEE items containing hazardous waste.

What is WEEE?

Waste Electrical and Electronic Equipment (WEEE) is a huge spectrum of products from computers, printers and faxes, to washing machines, fridges and even batteries. IT and office equipment comprises only 12 per cent of the total electrical and electronic equipment recycled in the UK (that amounts to 95,000 tonnes).

However, it is not just IT equipment that is the problem - the remaining 88 per cent of WEEE is made up of other electronic and electrical equipment, for example the calculator on your desk. Hazardous components in electronic equipment are a major environmental concern and, up until now, end of life waste was not undertaken to a sufficient extent. At least one million tonnes of waste electrical and electronic equipment from domestic and commercial sources is discarded in the UK every year. And this figure is growing. We need to take action, fast.

Corporate social responsibility

There are potentially serious consequences if you do not comply, including unlimited fines and even imprisonment. It is estimated that the UK economy will have to pay between £217-455 million per annum to comply with the WEEE Directive. These costs can be reduced by acting now and planning ahead. Organisations are in a better position to manage the costs involved if they take action now. Most leading companies have environmental and corporate social responsibility policies in place and have already assessed their positions and implemented the relevant changes so there is immense pressure to follow suit.

The companies that are already making the changes will strongly influence the entire marketplace; organisations cannot afford to be behind on this issue. If you deal with companies outside of the EU, you may need to respond in a shorter timeframe than that required to meet UK legislation.

You have to ensure you can provide your (or other people's) customers with satisfactory answers and solutions. But as well as saving money, your organisation will reap marketing benefits and supply chain improvements. The real issue is still one of corporate social responsibility, an issue organisations cannot afford to ignore.

Environmental impact

What do you do with your waste electrical and electronic equipment now? Most of us are led to believe that by exporting our waste to third world countries such as Africa, we are doing something charitable. Actually, this couldn't be further from the truth.

Research indicates only 25 per cent of electrical items sent to 'help' the third world countries actually end up in education or local commerce there. The equipment is often not suitable for reuse as it will not function with their current operating systems. The majority ends up in rural areas where the locals work in appalling conditions to recover the raw materials.

In a PC for example, they will need to smash the tubes inside to recover the copper. In doing so they breathe in poisonous phosphor dust. The glass tube (which contains lead) is then discarded into the environment. In short, they have poisoned themselves, their water, and their environment. The end of life disposal is not taken into consideration. Therefore, we are just moving the problem to another country - one that has even fewer resources to deal with the issue

of waste electrical equipment than we do.

WEEE Compliance Options for B2B Non Household WEEE

1. WEEE Policy Non Explicit

Introduce a non-explicit policy for the disposal of WEEE as and when it arises that sets the criteria for compliance by staff using a licensed waste carrier and/or (A)ATF. This is a status quo position for most businesses.

The introduction of WEEE Policy Non Explicit allows local managers to source and deal locally with WEEE issues. Implementation would require the following for implementation: Training of Managers and Staff in the buying criteria for environmentally sound disposal of WEEE and the complexities in dealing with Historic, Non Obligated or Obligated WEEE. It would include the need for sales and product information to be stored with the EEE item for its lifetime to ensure obligated WEEE is not needlessly paid for when being disposed.

Advantages:

- No contract required for WEEE categories other than that which exists for ICT. Disadvantages:

- No control of costs and/or compliance of the WEEE disposal contractor;
- Staff training would be needed for a minimum 186 persons;
- Not environmentally sustainable;
- No control over corporate social responsibility.

2. WEEE Policy Explicit

Introduce an explicit WEEE Compliance Policy that has key features:

- A flexible EEE procurement policy allowing the Obligation of new EEE purchased to be taken when the supplier's terms are expensive and or restrictive;
- Alternatively, a Rigid EEE Procurement Policy will allow you to extract the Obligation Fee from the supplier's price reducing the administrative burden of arranging for the collection of obligated WEEE separately from Historic or Non Obligated WEEE;

- It would seek contractor(s) to provide a WEEE Collection Service from Buildings when WEEE arises;
- It would, via your intranet, provide a step-by-step guide for arranging a compliant collection;
- It would seek its contractor(s) to undertake a Historic WEEE Amnesty prior to the introduction of the WEEE Compliance Policy. Advantages:

- Control over the cost and compliance of the contractor(s);
- Limited staff training;
- Environmentally sustainable;
- Corporate responsibility;
- Contractor may offer Obligated WEEE Collection Free of Charge. Disadvantages:

- Has a potential to be costly due to using a single WEEE item rate card for charging.

3. WEEE Policy Explicit with Internal Systems

Introduce in addition to the explicit WEEE Compliance Policy a tiered system with a WEEE disposal method based upon the buildings dynamics, geographical location and service constraints:

- An annual collection of WEEE that is pre-determined by date i.e. the building facilities representative is instructed and aware of the window for the Annual Collection of WEEE from their building and arranges for any WEEE arising to be ready for collection. This function could be provided by either a contractor(s) taking the WEEE direct to an ATF (Recycling Facility) or internally to a WEEE Collection Point.

- Suitable container solutions to fit the buildings dynamics facilitating safe storage of WEEE. This function could be provided by either a contractor(s) taking the WEEE direct to an ATF (Recycling Facility) or internally to a WEEE Collection Point.

- The business operate a geographical network of WEEE Collection Points that segregates the WEEE into containers with WEEE arising from the building and other sites creating significant cost savings against a single item rate card mechanism and improved environmental performance through sustainable transportation. Advantages:

- Control over the cost and compliance of the contractor(s);
- Limited staff training;
- Environmentally sustainable;
- Corporate responsibility;
- Contractor may offer Obligated WEEE Collection Free of Charge;
- Cost significantly reduced due to segregated WEEE placed in containers invariable costing less than a single rate card system. Disadvantages:

- Needs a WEEE representative for each building with containers.

Further information

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