

Environmental Audit Committee

Oral evidence: Electronic Waste and the Circular Economy, HC

Thursday 11 June 2020

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Members present: Philip Dunne (Chair); Duncan Baker; Barry Gardiner; Mr Robert Goodwill; Ian Levy; Marco Longhi; Caroline Lucas; John McNally; Dr Matthew Offord; Alex Sobel; Claudia Webbe.

Questions 1 - 64

Witnesses

I: Gurbaksh Badhan, Chair, National Association of Waste Disposal Officers (NAWDO), Phil Conran, Chair, Approved Authorised Treatment Facilities (AATF) Forum, and Lee Marshall, CEO, Local Authority Recycling Advisory Committee (LARAC).

II: Scott Butler, Executive Director, Material Focus, Louise Grantham, Representative, Waste Electric and Electronic Equipment (WEEE) Scheme Forum, and Adrian Hawkes, Representative, Distributor Take-back Scheme (DTS) for electronic waste.

Written evidence from witnesses:

- Phil Conran, [WEEE statistics from AATF](#)
- Scott Butler, [Material Focus](#)



Examination of witnesses

Witnesses: Gurbaksh Badhan, Phil Conran and Lee Marshall.

Q1 **Chair:** Welcome to the Environmental Audit Committee for our second hearing on our inquiry into e-waste and the circular economy. We have two panels today, and I am delighted to welcome the first set of witnesses to our first panel. I will ask them to introduce themselves and just say which organisations they are coming from. We will start with Gurbaksh Badhan. Could you unmute yourself, please, when you are going to speak?

Gurbaksh Badhan: Good morning. My name is Gurbaksh Badhan, Chair of the National Association of Waste Disposal Officers for England.

Phil Conran: My name is Phil Conran. I chair the Approved Authorised Treatment Facility Forum, which is an informal group representing about 20 AATFs, which represent about 85% of the total treatment capacity for WEEE.

Lee Marshall: I am Lee Marshall. I am the CEO of LARAC, which is the Local Authority Recycling Advisory Committee. We represent collection, disposal and unitary authorities across the UK.

Q2 **Chair:** We are going to look today at some of the challenges and complexities of managing this very significant waste stream. The EU has set a number of directives to recover and to encourage recycling and targets are being progressively tightened. The UK met the lower level of targets and is increasingly failing to meet the higher levels of targets. One of the things I am keen to establish, and the Committee is looking to take evidence on in this session, is whether the targets—*[Inaudible.]*—as we have to do it as a nation and as we take responsibility for it and come out of the EU. *[Inaudible.]*—long phrases, so if you can, assume that you are talking to somebody who is not in the sector. Gurbaksh, could you unmute yourself? You seem to have frozen.

Gurbaksh Badhan: I do believe I am here. Sorry, Committee Chairman, you sort of broke up in some of that introduction there. I will just give you an overview—I think that is what you have asked for—of our view as an organisation on WEEE and some of the challenges that we believe it is possibly facing and ways to possibly unlock it and incentivise some of the harder to reach WEEE products.

We have reached some of the targets, but it appears that there are some more challenging targets ahead. In our view, the low-hanging fruits have been taken and it is cost-effective to do so; mid-hanging fruits are harder to reach and the cost and the compliance fee that comes with it can be somewhat disincentivising; then there is the hard-to-reach fruit in terms of WEEE and the associated costs. Sometimes we do feel that the compliance fee itself is not properly incentivising some of those costs associated with pulling out that hard-to-reach material. Maybe there is



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something this Committee could do to possibly incentivise that and unlock some of those barriers and challenges.

Alex Sobel: Chair, would you like me to take over?

Chair: Alex, if you can. I am afraid my signal seems to be very intermittent.

Q3 **Alex Sobel:** I will take over and finish this question and then we can move on to other people for subsequent questions. Lee, obviously you represent local authorities and waste officers in local authorities. Could you explain how local authorities and waste collection officers in the local authorities sit within the ecosystem of electronic waste disposal and reprocessing?

Lee Marshall: When the UK implemented the WEEE regulations, they decided that the national collection system for the UK would be based on the household waste recycling centres. We like acronyms in the waste world, so they are now DCFs—designated collection facilities—and that is where the majority of the WEEE is then collected in the UK.

Obviously, that covers predominantly larger items and caters for larger items quite well, washing machines, fridges, freezers—those sorts of things. What we are starting to realise now in the UK is perhaps that is not necessarily the best network for getting the smaller WEEE out of the system, so local authorities are working with producers and others in some cases to maybe look at how we do kerbside collection of small WEEE to try to make sure that the producers meet their targets.

In effect, the producers who are responsible under the WEEE regulations are using and utilising the local authority infrastructure. In terms of producer responsibility legislation, the local authorities obviously are not producers so do not have responsibilities in that sense, but they do have responsibilities if they sign their HWRCs up to be part of the collection network.

Q4 **Alex Sobel:** Phil, the approved authorised treatment facilities, how do they sit within the system?

Phil Conran: Effectively producers who put electrical equipment on the market have to be able to demonstrate that they have met the targets and they do that through the producer compliance schemes. To get the evidence to show that you have met the target, you have to get effectively equivalent tonnage evidence from these treatment facilities. The approved authorised treatment facility network has to provide the evidence of what they have recycled or have taken in for recycling for the producers to be able to demonstrate that they have met their targets. Approved authorised treatment facilities have to get accredited, they have to meet certain standards and they have to recycle to certain levels any WEEE that they receive, so it is the essential ingredient in being able to demonstrate that the UK is meeting its targets.



Alex Sobel: That concludes my question. We have Duncan now, who has some questions around the impact of covid on the system.

Q5 **Duncan Baker:** I am sure, like everybody, I speak for us wanting to get our recycling centres open as quickly as possible for many reasons, such as people clearing out cupboards and drawers and things like that and not wanting to see more fly-tipping. What impact has the pandemic had on household waste and recycling centres and how has this affected specifically the collection of e-waste? That is to Gurbaksh.

Gurbaksh Badhan: At the start of the pandemic there was a bit of a settling in understanding of what is essential, what is not and what services need to be running. For those in some places who offer collection, we are obviously looking at the core prioritisation of services and at what is absolutely key to keep the public safe, and as business continuity plans activated over a number of weeks you saw a bit of a stabilisation of core services.

Obviously within that, household waste recycling centres were not deemed essential so they were literally closed, cutting off, not just somewhere to dispose for the residents, but quite a lot of material that would have flown through the system, including WEEE.

Q6 **Duncan Baker:** Do you think there are lessons we can learn from this experience to improve waste services and recycling in the UK if we experience this again?

Lee Marshall: Yes, there are definitely lessons to be learned. The closure of the HWRCs was quite a visible change in service for residents, but the majority of kerbside services kept going. Now that we have gone through this once, we have a better idea of how we can operate HWRCs in a situation where we need to implement social distancing, where we have to manage the traffic and protect the health and safety of the public and, obviously, try to stop the pandemic spreading any further, so lessons have definitely been learned. The local authorities and their contractors have already learnt a lot of those lessons and you are seeing that as they implement the reopening of HWRCs. We are at the point now where there are only about 10% of HWRCs that are still closed.

Q7 **Duncan Baker:** Can I just pick up more specifically on some concerns, particularly with e-waste? As people were clearing out, do you think that some has ended up potentially in the wrong waste area? Can we counteract that better?

Lee Marshall: The messaging has been very good, both support from central Government and WRAP and out from the local authorities as well. There may be instances. If the service is not as easy as it used to be, then there may be some people who will take the opportunity to put the waste in the wrong place, but we do not believe we have seen big instances of that. Local authorities are reporting different levels of fly-tipping. Some have seen it go down, some have stayed the same, some have seen it go up a little bit, but we are not aware of large instances of



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WEEE being tipped. We think, generally speaking, the public have listened to the message about holding on to your waste for the moment and waiting until there is the opportunity to bring it back out when the services are there for them.

Alex Sobel: I will bring Barry in now, who has a series of questions about why we are not meeting the targets that were set on e-waste.

Q8 Barry Gardiner: I want to focus my questions on why the system is not working. I know all of you recognise there is a problem, in that we failed to meet our targets for three years in a row. Last year the EU target of 65% of the product placed on the market gave us a UK target of 550,000 tonnes, which we missed by 55,000 tonnes. This year it appears that, although under retained EU law we are still bound by the 65%, we are now setting an even lower target of 538,000 tonnes. I would be very pleased if any of our panel can explain why that is the case.

In particular, I want to ask Lee first what role the lack of consumer awareness plays in all this, or is it too easy to blame the consumer? In our previous session, we heard the first law of waste dynamics: that waste goes down the cheapest hole and this encourages it to be incorrectly treated. Given that producer compliance schemes gain members by offering the cheapest service, does this not create a downward spiral where legitimate operators are having to compete with less scrupulous ones?

Then to Gurbaksh, your association has said it would like the whole system of producer compliance schemes to be fundamentally reviewed. Could you perhaps explain the role of the compliance fee and why it is set at what is referred to as "the true cost of recycling"? If producers are not meeting their obligations, why is the fee for non-compliance not much higher to impose a penalty that reflects their failure to deliver the public good of recycling?

Finally, to Phil Conran, you chair the forum for approved authorised treatment facilities and you have been commendably frank in setting out your forum's view that your members are not being properly monitored and enforced. You have talked about unscrupulous operators who are good at completing forms, taking advantage of the failure of enforcement on the ground. I admire you as a chair who is able to stand up and say, "Some of my members may be committing fraud". Can you outline where you think the system is going wrong and also maybe talk about the producer free riders like Amazon?

If I can go back to Lee first and then take the other two in turn.

Lee Marshall: In terms of the consumer, ultimately, they have a key role to play because they have an item of electronic equipment that they deem they no longer need anymore, which for them does not have a value, but obviously for someone else in the chain it does. We need to make sure that we then get that from them into the proper reprocessing repair chain. They are key but, yes, you could argue it is a bit too easy to



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blame the lady and gentleman on the Clapham omnibus for not putting the right thing in the right place.

There is more that producers could do in terms of communication, not just directly from themselves, but supporting local authorities and people like WRAP in getting more consistent messaging across, also then supporting local authorities and others in putting collection schemes in place. Generally speaking, for larger appliances there are lots of easy collection systems out there. You can take it to the HWRC, you can book a bulky waste collection through the local authority, and producers, in fairness, offer take-back services as well.

It is when you start getting down to smaller items of WEEE. If they have anything that can fit in a bin, potentially it will go in there if there is not an easier or as-easy system for people to use. I know there has also been research done as well about how people view smaller WEEE, like telephones and laptops and things like that. They look perhaps to discard it in recycling because of data and the perceptions of value and things like that. There is definitely a role for the resident to play. Ultimately, they have made a choice to throw that thing away, so we want them to do it responsibly. Equally, they need systems that are relatively easy for them to use as well.

Q9 **Barry Gardiner:** But they are not being encouraged by the producers to do that though, are they? Yesterday I had to refill my printer, and I opened all the instructions, but there was nothing there about sending the old cartridges back. No incentive from the producer to me, as the consumer, telling me that I could go back to the retailer and do that.

Lee Marshall: There is definitely more that producers could do in terms of information, making it nice and clear on printer cartridges, putting post-back envelopes, and things like that, yes. From a local authority point of view, we would argue that would be more akin to true producer responsibility.

Q10 **Barry Gardiner:** Should that be mandated by Government? Is that something that you would like to see in the regulations?

Lee Marshall: What we would like to see is use of the most efficient systems. I said earlier on in the evidence the local authority HWRC network is used by the UK. Local authorities do not have any responsibilities under producer responsibility, but use of that network is probably the most efficient, which helps producers and UK plc be competitive. It is about implementing efficient systems for producers, but they still need to be comprehensive. Where local authorities can help them in that, then local authorities should be funded for it. Where producers have to perhaps implement their own systems then, yes, they should be encouraged to do that. If it was felt that mandated systems were needed because the targets were not being met, then that is something we would support if they were appropriate and achieved the outcomes we think they should.



Q11 **Barry Gardiner:** What about the producer compliance schemes and that first law of waste dynamics?

Lee Marshall: They all need to be competitive so they can offer a cost-effective service. Being cheap does not necessarily mean it is a bad service. Again, within other sectors of waste you can get waste crime. When I started my career, I used to go and inspect abandoned vehicles and when the price of metals was high you had less abandoned vehicles on the highway because they had a value to them. There is an element of market forces in there and that is perhaps where support and funding for the regulators needs to be looked at.

Q12 **Barry Gardiner:** Gurbaksh, I will maybe turn to you now with the question I put to you in particular about the producer compliance schemes and also the compliance fee.

Gurbaksh Badhan: We expressed our view in our written evidence that we do believe a bit of a reform needs to take place in this sector. There are quite a lot of compliance schemes, if we start there. We are part of the chain where it flows in through HWRCs, kerbside or bulky waste fly-tipping. We have to sort the material out and move it through the supply chain. When you look at it, you have a huge variety of different types of local authorities. You are offering up your designated facilities into the system, and there is come-and-collect and clearers. There is a whole raft of current regulations that come into play under the current system and a whole number of different kinds of compliance schemes. One could ask whether there needs to be a little bit of a consolidation there.

Q13 **Barry Gardiner:** There are lots of different definitions, aren't there?

Gurbaksh Badhan: What it does do is drive some interesting behaviours. If you are in an urban local authority area and you cannot help the genetics of that local authority, it is quite productive, it is quite cost-effective to shunt along the road and collect your WEEE or at a HWRC—very densely populated. If you akin it to a beaded pearl necklace and it is sporadic with huge distances in between, cost-effectiveness starts coming into play. If you play that back and overlay it to rural, semi-rural local authorities, it is quite uncompetitive or not cost-effective to offer clearances, even if you offer up HWRCs and depots for clearances. As for many of our members—you can probably contact DEFRA and so forth on this—currently 11 local authorities are serving regulation 34 notices to clear their sites.

Q14 **Barry Gardiner:** Could you just explain the regulation 34s?

Gurbaksh Badhan: Basically, producers have a responsibility under the current scheme to come and collect your various WEEE items, so if they do not do that, you can force it to come and clear it. What you are doing is basically saying that quota for that area of that compliance scheme, they have achieved it, they do not want to come and collect from you. It is a real disincentive. As a local authority, you have to serve that notice to get your WEEE collected. It feels a little bit bureaucratic here. It is



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producer responsibility, after all. You are using local authority networks and assets to help move the system through, but yet we have to serve the notice to get our material moved through.

Q15 **Barry Gardiner:** How complex is that for a local authority?

Gurbaksh Badhan: It was quite complex a little while ago until we spoke to some lovely colleagues across in DEFRA. They did try to simplify it. Before, it was every movement. Every time a container was full you had to serve a regulation 34 notice and that was very bureaucratic. It was driving the system here and a process. Now we have to do it once every six months. You still have to do it, but it is every six months.

What we are trying to get to is what is the right thing to do here? You are using taxpayer-funded systems, in effect HWRCs or depots, so it is effectively free. You are not investing in that infrastructure or expansion of it, yet what you are asking us to do is just keep serving these bureaucratic notices to clear our systems. How is that producer responsibility? That is where we think some reform needs to occur and some sticky clogs need to be sorted out, including for authorities who are rural or semi-rural, they are offering up their systems here.

Q16 **Barry Gardiner:** Can you talk to us a bit more about your views on the compliance fee or, perhaps better named, the non-compliance fee?

Gurbaksh Badhan: It is interesting. You can understand why, from a producer perspective, they just do not want blanket costs. It is about market—what they are putting on in terms of market share to fund the system. You sort of understand those basic principles. Why would anybody want to pay for just a blanket system that does not include their material? You can understand those economics coming through.

The compliance fee itself, once you have met it, sometimes it is just cheaper not to collect once you have met your quota. It does potentially become a disincentive. There is no incentive in there to say if you collect extra you can have a reduced one, so there may be some positive drivers and incentives in how that fee may play. I know it sounds quite simplistic in quite a complex system anyway. Ultimately this is producer responsibility and our view is that we are calling for it. We have done a whole raft of other things under the packaging for extended producer responsibility. This is yet another material product that could quite easily, in a bit of thinking and policy-shifting measures, fall under extended producer responsibility.

Q17 **Barry Gardiner:** Given that the producers are relying on their competitors to bear the cost of the recycling of their own product, there is no incentive per se, is there, for them to design out waste from their product because they know that not only them but their competitors will be dealing with this anyway?

Gurbaksh Badhan: Exactly. You start touching on a whole raft of policy changes. Why is it in there? Surely to incentivise. You could drive



different behaviours there and surely prevention is always better than the cure in the system. Where is the eco-design coming in? Where is the incentive not to put some of that hazardous or difficult material in there? Where is that constant chain of keeping that material having extendable reliable life? I appreciate it is complex, like many other things, but it should not be beyond the wit of man to go into eco-design and full circular economy principles even for WEEE.

Barry Gardiner: Or even the wit of women.

Gurbaksh Badhan: Yes, or the wit of women.

Q18 **Barry Gardiner:** Lastly for you on that compliance fee. Would it make more sense to make that a higher penalty if they do not meet those targets, that is not just the cost of meeting the targets, because if it is simply the cost then they could do one or the other and it makes no real difference to them? It saves them the bother just to pay the money.

Gurbaksh Badhan: I suppose there are different ways, if you stand back and look at it, of how that could drive the right behaviour. If it is high enough, it becomes quite an incentive to go and get the hard to reach WEEE, like the hairdryers and toasters. That is where we are when we are talking about small WEEE, where sometimes it is difficult to pull out or people do not always think, "Oh yes, that is an electrical item, let's put that in the right place". To drive that through, you need to be able to get some positive incentives in there for driving the economic business case, if you can fund it, whether it be for kerbside or some kind of deposit scheme or a take-back scheme to get something back for it. There are different ways to incentivise putting the material through as opposed to the constant push.

Q19 **Barry Gardiner:** Thank you very much. I want to allow Phil to come in because he has quite a bit to say on the way in which the enforcement and monitoring regime should be taking place.

Phil Conran: The first point I would like to make is we absolutely do not have members who operate illegally or commit fraud. The point was that we have 20 members out of 93 operators of AATFs.

Barry Gardiner: You are the good guys.

Phil Conran: The whole point about the AATF Forum is to raise standards and to make sure that we have the enforcement regime out there that enables the system to be brought up to the standards that our members operate to and that we believe the whole system should operate to. That is where we do believe there are issues because there is not sufficient enforcement of some of the smaller operators.

Going back to some of the points you have just been talking about, this is very much a market-based system, and the producers, or producer compliance schemes on behalf of producers, will want their treatment done at the lowest cost. The biggest problem we have with a compliance



fee is that it does not therefore incentivise growth. We have a treatment infrastructure that is seeking to invest in the capacity that we believe we are going to need going forward, but if it is undermined by the compliance fee and we end up not collecting what we should be collecting under the targets, then it means that there is spare capacity and the producer compliance schemes will be looking to take advantage of that by getting the lowest cost possible.

Absolutely we want to see standards raised. Absolutely we believe as a sector we are moving in that direction generally, but clearly there are still enforcement gaps where both WEEE is escaping from the system and then WEEE that is coming into the system is not necessarily being treated as it should be.

Q20 Barry Gardiner: Can you perhaps elaborate on the role of the Environment Agency here and why you feel some of that enforcement and monitoring is not taking place properly? Then maybe also just talk about the free riders.

Phil Conran: There is certainly a resource issue with the Environment Agency. It has a large number of facilities across all the producer responsibility regimes—battery packaging as well as WEEE. There is a degree of expertise required in being able to fully understand where some of these illegal activities are taking place. It is very difficult to be out seeing all these facilities as often as they should do. People can operate illegally and at a point in time, if they are visited, can put on a good show to demonstrate that they are doing the right thing. There is definitely a resource issue that relates also to things like exports where the agency is also trying to ensure that the export—

Barry Gardiner: We will be coming on to that in a later question.

Phil Conran: Certainly there is a skills issue and there is a resource issue. There is also inconsistency across the UK as well. SEPA have a different view, for instance, on whether used electrical equipment is WEEE or used until it is established as WEEE to England and Wales. There are also variations in how WEEE is enforced across the UK.

Alex Sobel: We are coming on to John McNally now, who has a couple of questions around investment, which follow on very nicely from the conversation we have just had.

Q21 John McNally: First if Phil could respond and then Gurbaksh to my questions on basically expanding investment in recycling collection and separation within the waste processing infrastructure. For example, so much of the evidence we have seen suggests the UK Government are simply not investing in proper specialised waste-processing facilities. For example, a critical raw material being crushed, like lithium batteries, along with other materials, is causing lots of problems, lots of fires at waste resource centres. This is bad practice and basically a waste of processes. Could you tell us a bit more about you would improve the



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investment angle to the various systems that are available to us? At the moment, it does not seem to be working very well and investment seems to be very short term.

Phil Conran: A number of questions there. The first thing about investment in standards of treatment, we are certainly seeing some big investment in some of the plants. We have two new fridge plants, for instance, that have come on stream in the last couple of years, which are absolutely the top end of modern technology and we have plants dealing with small mixed WEEE, which are highly sophisticated. It is worth a visit because you can see how much goes into separating out all these different materials.

There has been investment, but it is being stifled to some extent because the compliance fee is undermining the collection side of things and we are not seeing the growth that we need. Because of that we are not seeing the prices that they need at the gate fee to carry on that level of investment. There is a chain of events that we need to consider to ensure that, at the end of the day, we get the material that can justify the investment, but get it at the right price.

You highlight one of the big concerns we have at the moment, which we are working on, and that is how we get lithium batteries out of the system before they get into these plants. Certainly lithium batteries are one of the big issues for the waste sector, not just the WEEE sector. More and more electrical equipment and batteries are being put in general waste, but even where they are put into the separate WEEE bins, people are not taking the batteries off. This stuff is either being crushed at the household waste recycling centres or being damaged in transit or at the AATFs. This is one of our big projects at the moment that we are working on and we are working with the European association to look at this because it is a common problem globally these days with the exponential growth in lithium battery use.

One of the problems is where you do you apply the procedures that are necessary to try to mitigate the problem? There have been some trials conducted last year on trying to get the public to do more to separate batteries, but it is very difficult to get the public to do things that add any level of inconvenience to what you are asking them to do with their recycling.

There is a campaign going on at the moment to collect more recyclables, but you will hear more about that from Scott. We do have to do more and unfortunately it comes back to cost. To reduce the risk of lithium fires we have to do more to collect small mixed WEEE in particular in smaller containers and to have more separation. It comes back to the competitive system we have, which is to some extent stifling this investment we need because we are not getting the collection volumes that we need now, and we are not getting the price that we need for that investment—not just in treatment capacity, but also determining things like the risk on batteries.



Gurbaksh Badhan: That nicely follows on for me. We go back to some of the heart of taking it up possibly and where the level is. We create things and put stuff on the market without fully considering some of the implications of it. We are back into the realms of eco-design and using the right material for the right products and so forth. Yes, sometimes in what we design and produce we take raw materials, which then later on causes an issue down the end of the pipe where we sit and move it through the system.

I would say batteries and small WEEE are generally one of the contributing factors where a fire sparks even at a HWRC. You know immediately there was an ignition source in there, be it in the residual because there is a battery in it or be it in a small WEEE container because there is a battery in it. This material on site does take quite a lot of management, and there are implications.

In terms of investment, I would probably share what Phil was saying and go a step further in saying most of the WEEE compliance schemes or the incentives are yearly. That is the yearly cycle. If you are looking for long-term investment, R&D and investing in better treatment facilities and so forth, they need to be bankable. One-year cycles, I am not sure banks or any lending sector are going to give anybody a loan. It is too short term. There needs to be some medium and long-term thinking in this. Why would anybody invest in it? Why would producers invest in a one-year fee compliance scheme? There are possible quick things or some simple things that would help to tweak the current system while some longer-term thinking has gone into what you do beyond this to get this material back into the full circular economy area.

Q22 John McNally: Barry mentioned something earlier on about printer cartridges. Before I ask my next question to Phil and then yourself, Gurbaksh, we have seen a huge amount of people buying electric bikes and cargo bikes for delivering things. There is a whole mind change in the way we are going to live our lives locally. I bought an electric bike myself and there is a huge battery in there. I am not sure, as Barry said earlier, what I do with the battery if it is faulty and there does not seem to be any plan in place for getting rid of these batteries. They are here to stay and that is quite obvious.

First, our Committee has received many comments from good companies who want to invest and develop best practices, ethical practices, but they are being put off principally by short-term Government policies, as you have just said. I remember two or three years ago an American Senator told us that in California, I think it was, they developed a 25-year, all-party agreement policy. The only policy they would have on energy would be renewable energy and that seemed to be a great idea. But that certainty of policy, followed by certainty of investment, seemed a huge step forward. I am not aware of the situation in other countries, but I think some of them do that. I wonder if you could tell us how you think Government should act in developing longer-term certainty of policy so



that people that wish to invest could invest with some peace of mind. I go back to the point you made about banks, maybe following on from that.

Phil Conran: Just to go back to your batteries and your bike, we also have parallel producer responsibility for batteries, and the sorts of investments for the treatment of the battery capacity that we are going to need should be taking care of that. One of the problems we have there, again, is that it is very much price orientated, and what we find is the vast majority of the evidence to meet the battery target comes from lead acid batteries, even though only a very small number of lead acid batteries are classed as important and put on the market. There is 800% reporting of battery recycling compared to batteries placed on the market in the lead acid sector.

There needs to be overall reform of producer responsibility to make it much more sustainable and long term and we are seeing that coming through. Initially on packaging, we have EPR coming through, which will give producers much more responsibility to cover the full cost, not just of collection or treatment, but also of things like communication and education. Over the next two or three years we will see that level of reform you are talking about that will make this much more of a long-term sustainable programme.

One of the big problems in the past is we have also always relied on a highly competitive market with large numbers of compliance schemes. In those sorts of competitive environments, as Gurbaksh rightly points out, with the very short-term nature of producer responsibility, which is always on an annual basis, you are always going to get those constraints. The Government needs to look at for WEEE, in a similar way to packaging, some more centralised, more long-term, more sustainable programmes to ensure that our sector has the ability to invest in the knowledge that they are going to get both the volume and the price they need to justify that investment.

Alex Sobel: Now we move on to Caroline, who is going to ask about the export of e-waste. Exporting waste is something that we talk about a lot in our inquiries.

Q23 **Caroline Lucas:** I want to come to Phil Conran again first, please. You said that the UK export system is very lax and that there is a need for much tighter reporting requirements on exporters. I wonder if you could say a little bit more. You were about to have that conversation with Barry about the role of the Environment Agency, but also I wanted to explore in particular why it is that Scotland, for example, seems to have a more enlightened approach to this, where they seem to be deeming every bit of electronic equipment as WEEE until it has been tested, whereas in England we seem to have a different approach. What role would standardisation across the UK play and in particular why is it that the Environment Agency, as far as you know, does not have the same approach as they do in Scotland right now on this?



Phil Conran: That is a question we have been asking for some years now. We have been talking to the agency about clearer guidance on the definition of WEEE as opposed to used EEE. If it is used EEE then clearly, as it is not waste, it does not have to conform with waste regulation. Not only does it not have to conform with waste regulation in the UK, but in terms of exports there is less control as well.

There are requirements. If you are going to export WEEE, there are EU correspondence guidelines that the Environment Agencies apply where you have to have everything tested but because it is not in the system, because it is not waste, then it is very difficult for the Agency to monitor that. Certainly our members are constantly getting calls from people trying to buy old televisions and computer equipment and stuff, which frankly ought to be being put through the treatment sector. They are buying it because you know they are going to export it. It should not be being exported in that state, but it is very difficult to keep a track if it is not classed as WEEE when these people take it.

In terms of the export system, it is very loose. For green list waste, for instance, there is no prenotification to the Agency, and the Agency does struggle to track it. But I do not think our exports are as big a problem as they used to be. A lot of people referred to the Basel Action Network report from the beginning of last year, which suggested that the UK was one of the biggest offenders on exports. I think they were talking about 209,000 tonnes a year being illegally exported. When you hear from Scott you will hear that the latest WEEE flows project they have been funding suggests it is probably not that much more than about 15% of that. Do not get me wrong; that is still a very poor figure, but it is not nearly as bad as either it was or was reported by some fairly dubious evidence from the Basel Action Network.

Certainly there is more that can be done to make it absolutely clear what is and what is not WEEE. There needs to be some conformity between different environment agencies; that would help. The agency has very good intelligence these days on who is exporting illegally. It has had some good prosecutions, but it is still a bit of a needle in the haystack finding this stuff if it is not classed as WEEE.

One of the big areas of concern is warranty returns. I have been to a warehouse that buys warranty returns and a lot of this stuff—huge sandwich toasters, for instance—is being exported as product, not as WEEE. It is not being properly tracked, it is not being properly checked and it is often ending up as waste in other countries when it should not be.

Q24 **Caroline Lucas:** What are the actual barriers then? If it is fairly self-evident that standardisation would be positive, as long as it was standardising upwards towards the Scottish model, why is the Environment Agency not doing that? What would they say if they were here on this call?



Phil Conran: What it has said to us is that it has a different legal interpretation to what the rules are. That is the way that it operates. It is frustrating. I am not saying it is right or that SEPA is right. Our preference would be for the SEPA system where effectively it is classed as WEEE until it has been assessed as being reusable, but it comes down to legal interpretation. It has been challenged several times. Last year we had further clarification on the difference between used EEE and WEEE that did not do much to enlighten the situation.

Caroline Lucas: I do not know if Lee wanted to add anything on that.

Lee Marshall: Not from me.

Q25 **Caroline Lucas:** In that case, continuing on the subject of what more the UK could do, I am glad to hear that you think that the evidence is not quite as strong as some might suggest in terms of where we are in the ratings of how bad we are when it comes to illegal exports of e-waste, but beyond what we have spoken about so far, is there anything else that you would suggest in terms of tightening up the export system?

Phil Conran: The export system is going through a review at the moment and I know there is going to be consultation early next year that will certainly tighten the process up for England. I am not sure how much further that will extend in the UK, but it will make prenotification of all waste. I think there needs to be much better guidance. It is not just clearer guidance; it is the availability of guidance. I do not know how acquainted you are with the WEEE side of gov.uk but it is often very difficult for Joe Public to know where to look to understand exactly what is WEEE and what is not and exactly what the rules are.

There needs to be clearer guidance, more education, better permitting and licensing of people who are in the WEEE sector and there needs to be more control over people who are exporting and perhaps a licence for people to export used EEE because at the moment anybody can buy used EEE and put it in a container or lorry and send it over to Europe, and there are no controls. They do not have to be registered. Certainly there is more that can be done.

Q26 **Caroline Lucas:** How much comes down to the resources of the Environment Agency to properly enforce this? We know that so many of these agencies have had staff cuts and are under pressure because of resources. Do you think there is an issue not just with the regulation, but the enforcement of what is already there?

Phil Conran: Yes. I think certainly there are resources used. They have had quite a high turnover of staff. I know a lot of effort has gone into training up the staff now who are directly involved in the producer responsibility side. If you look at the difference between SEPA and the EA, SEPA have a more integrated approach to how they manage waste regulation, so the people looking at exports will be the same people looking at producer responsibility, but it is obviously a much lower scale of facility. I think the Environment Agency has a huge problem dealing



with both permitted or approved operators in the WEEE sector and those who operate illegally. Yes, I think there is definitely a resource issue.

Q27 Caroline Lucas: Finally, we have heard that setting up international partnerships for tech transfer is essential to the sustainable management of e-waste in developing countries. Do you agree with that? What more can be done to encourage more of that in the UK and also can you reassure us that all of this is not just putting a gloss on essentially using developing countries as a dustbin for waste that we do not want to bother to deal with properly? I still worry how we can be sure that in developing countries they are getting some serious benefit from this and that those benefits outweigh the risks.

Phil Conran: Is there enough international co-operation? Probably not. Could we do more? I am sure we could. Certainly, as an AATF sector we are not directly involved with discussions with the developing countries in these areas. Having said that, in my past life I have certainly been involved with operators and with charities. Hewlett-Packard, for instance, has spent a lot of money and a lot of time in some of these developing countries introducing producer responsibility and providing the take-back facilities that they are looking for. At the end of the day it is all about economic benefit and if people can make a quick buck out of doing things badly, then I am afraid that tends to be human nature.

The best we can do is to tighten up as much as we can on our own exports, but I think there is also certainly a role for more international co-operation. The Basel Action Network monitor a lot of this sort of stuff and you have seen some of the work it has done putting trackers in items of WEEE. I think some of the conclusions it draws, as I said earlier, are a bit dubious. I do not know what the UK Government are doing on this wider scale, but I think there is more that the UK can do to work with these other countries.

Q28 Alex Sobel: I will follow up on that. The UK Government are not doing anything. The German Government have invested €20 million in an e-waste processing plant in Ghana. We know that some of our electronic waste goes to Ghana—as you have said, we have tracking projects. Do you think that as there is an inevitability that some of our e-waste is going to end up in Ghana and other places that the UK Government should look at doing what the German Government are doing and invest in better facilities that also protect the people that work there as well as improving the reprocessing?

Phil Conran: There is certainly an opportunity for the UK to do more to help some of these Governments set up producer responsibility schemes that would both deal with our own waste effectively and deal with imported waste. As I say, I think a lot of the illegal exports of waste have been significantly reduced, but what we are still seeing is a lot of exports of used EEE where effectively it is going out for supposed reuse, but often when it gets out there, it is not in the condition it should be for it to be reused. There is more that we can do. I think we should consider how we



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can perhaps help these countries to develop their own producer responsibility networks, but as I say, the main concentration should be continued reduction of the illegal export market that still goes on.

Q29 Alex Sobel: I am going to finish off this first panel with a couple of questions. To Lee—Gurbaksh touched on this earlier—what role does eco-design play and what key change do you see? For instance, we have increasing complexity in the market with things like mobile phones and tablets that have huge numbers of elements and metals in them, including rare earth metals like indium and terbium. Do the designs need to be simplified by manufacturers or are we able to fully recover those elements and rare earth metals?

Lee Marshall: There is definitely a role for eco-design. For me, eco-design is not just about the product and making it so you use as few resources as possible, but it is also about designing it for disassembly at the end. You heard about the treatment plants earlier on in the evidence and at the moment the treatment plants are designed to recycle the products based on how they are constructed at the moment. If they are constructed in a way that makes it difficult to get all the materials out, the treatment plants will have trouble in getting all the materials out, whereas if you can design for disassembly and recycling, that makes the treatment side of things a lot better and it means you can capture more materials. It is like the old story of the garden spade. You have had it for 20 years, and it has only had four new handles and five new heads. It is that sort of concept.

A lot of WEEE nowadays becomes WEEE because a component within it has broken, but you end up replacing the whole thing. If there is a possibility at some point in the future—and I appreciate it is a massive step from where we are—in that the average person in the home can almost remove that component, get a new component through the post and replace it themselves or someone comes out to do that for them, you are almost manufacturing in the home in one aspect. Then the piece of WEEE you have is very small compared to the big item that perhaps we are chucking away at the moment. I do not know how we get there. That is more of an ideal, but that sort of thing is definitely where we should be aiming at the moment. It is very easy to focus on the recycling aspect rather than the reuse, the repair and the design aspect of it all.

Q30 Alex Sobel: Moving on, we currently have the Environment Bill, which should be coming back to Committee shortly. I am on the Environment Bill Committee as well, and that Bill is aiming to give Ministers the power to establish a new EPR scheme for electrical and electronic equipment. How do you see the scheme differing from how the current system operates under the EU and what would you like to see included in the design of the new EPR?

Lee Marshall: I think a lot of producer responsibility up to now has generally focused on the recycling aspect of it because it is easy and everyone can understand it. There definitely needs to be more focus



higher up the hierarchy, on reducing in the first place, so that is minimising the resources in the products in the first place through eco-design and then looking at repairing and reusing material in the first place before you then get to the point where, "Okay, we cannot reuse it, we cannot repair it, now we are going to have to recycle it". Looking higher up the chain would definitely be a positive.

There also needs to be a recognition that exports have a role, so waste is traded on a global market, not just WEEE, so if we are buying products that are manufactured in another country, those other countries are going to need the raw materials and secondary materials to make those products in the first place, so we need to make sure that exports are seen as a legitimate part of the process. Sometimes they can be demonised a little bit because of the reasons that have been outlined already. We need to accept that exports have a role to a certain extent, but if we can minimise them, good, and where they do have a role they need to be up to the standards that we would expect wherever the material ends up.

Q31 Alex Sobel: Yes, which would require investment in looking at those facilities. Finally on this panel, Gurbaksh, as we have this opportunity now with the Environment Bill to change things, would you welcome looking at, for instance, kerbside recycling of WEEE or do you think that it should remain, as it is now, at household waste sites?

Gurbaksh Badhan: As Lee indicated earlier, it is the most cost-effective solution. Some of the items are better managed at HWRCs or take-back schemes or postal schemes and some of the items may well be best fit at kerbside. It has to be fully funded and it has to be the whole system cost—no matter where it goes. It is almost like if you look back at some of the packaging core material discussions currently going on about what is in and where it falls in the system, there should be no part that is left that the cost is not recovered from. We may be able to attract some of the more difficult WEEE if it is more convenient for the public. Whether it is some kind of different return scheme or localised take-back scheme that works, it has to be a mixture of things and kerbside may well play a part, especially where you have some areas that are sparse in terms of rurality.

Q32 Alex Sobel: What sort of items do you think would go in the kerbside?

Gurbaksh Badhan: Hairdryers, toasters, the bits that people—not thinking about it—would quite easily pop into their residuals, so we need something convenient. They need some convenient way to park that small item, because they do not want to store it in the garage for a year or six months and then make a trip to their HWRC for it. I know people do, but people want convenience, do they not?

Alex Sobel: Yes, so it is more electrical items and electronic, rather than the large electrical items. That is helpful. Thanks, Gurbaksh. That concludes the first session. I think Philip is back online fully now, so I am



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going to hand back over.

Chair: Thank you very much, Alex. You did an admirable job in keeping to time and taking over that session. It transpires that my internet went down completely, which is why I was having trouble. Hopefully it will now be back. Can I thank our first panel, Gurbaksh, Lee and Phil, for your contributions, some of which I heard? We are now going to move over to the second panel.



Examination of witnesses

Witnesses: Scott Butler, Louise Grantham and Adrian Hawkes.

Q33 **Chair:** Welcome to our second panel for today's session. I would like to ask our witnesses to introduce themselves very briefly and then I will ask a first question for each of you. Our witnesses represent the waste collection system that we have just been hearing about at the end of the previous panel covering producer compliance schemes, the Distributor Take-back Scheme and the administration of the compliance fee that was talked about in the previous session. If we could start first with Scott Butler, please, just to introduce yourself.

Scott Butler: My name is Scott Butler. I am the Executive Director of Material Focus, and we are a not-for-profit organisation. We administer the compliance fee and we also distribute the money collected through that fee.

Louise Grantham: Good morning. My name is Louise Grantham. I am representing the WEEE Scheme Forum, which is the body that has the majority of WEEE compliance schemes as members, and we discuss matters that are of a non-competitive nature.

Adrian Hawkes: Good morning. Adrian Hawkes, the Policy Director at Valpak. Valpak does a number of things, but one of them is that we manage and administer the Distributor Take-back Scheme within the WEEE system. I have been invited in that capacity today, but we also run a producer compliance scheme, but I am here for the distributor scheme today.

Q34 **Chair:** Thank you all very much for joining us. I am going to ask each of you to give us your headline views on why it is that you think the UK has missed the targets in recent years that we were talking about in the first panel and what do you think accounts for the fact that reduction is reducing in e-waste collections rather than increasing, as it should be? Can we start with Louise, please?

Louise Grantham: Yes. There are a whole variety of reasons why the UK has not achieved the targets that have been set. If you think of EEE placed on the market—electrical products placed on the market—in some cases they are a lot lighter than they used to be, if you look at TVs and in other cases they are heavier, so you have a lot of changing product weights to deal with in the sector. There are differences in consumer trends. Consumers retain some products in their home for a long period of time.

We have ease of access to collection points. Local authorities in particular over the recent years have experienced a lot of pressure; they are increasing more waste that they collect, so sometimes the space available for collecting electrical appliances is reduced as well. We have had problems with illegal activities, removing weights from things like



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fridges. Unfortunately, there has been a lot of illegal theft of compressors and also some illegal export activities that still take place.

It is quite a complex system, so it is not just about compliance schemes not wanting to collect WEEE. In fact, most compliance schemes are very responsible organisations. They have producers that have strong corporate social responsibility ethics, so they do not want to sit back and not collect WEEE. The WEEE directive also has a big focus on waste at the moment and of course that is what the UK regulations are framed on, not a circular economy, because we want to try to create a circular economy, not to generate waste. It is quite a complex picture and it is not about compliance schemes not wanting to collect WEEE. It is more about trying to understand all of these different products flows, in-life product flows, and all of them contribute to why we have missed the targets.

Q35 **Chair:** Thank you. Scott, could you address the same issue with your views?

Scott Butler: Louise makes a very good point in relation to the technology transition. If you think about a big TV from 15 years ago or a big old cathode-ray tube TV, it is much heavier than the flat panels that most people now have. We have seen over the last few years a lot of those old TVs coming back into the system, but now that trend has moved off and therefore you get those weight discrepancies. The big challenge—

Q36 **Chair:** Can I interrupt you there? Is that because we are counting in terms of tonnage?

Scott Butler: Yes, we count in terms of tonnage. A weight-based system does not necessarily reveal the nuances of the items that are coming in.

Q37 **Chair:** So, as technology shrinks the size of consumer goods, the tonnages naturally come down and therefore should the targets be adapted to reflect that, do you think?

Scott Butler: They should. In fact, we are just about to launch the findings of a study that we have done into EEE and WEEE flows—apologies for the acronyms—but we are looking at where products are entering the system and leaving the system to try better to understand where we can focus the industry's activities. A common theme to all of the people you will be talking to today is the challenge with small electricals, which is the area that we need to intervene in to stop people taking what is the most simple route at the moment, which is to pop it in the bin or to put it in a cupboard and wait for another day.

Q38 **Chair:** There are schemes for some small electricals like mobile phones to have some reverse vending machines where people can get paid for depositing their second-hand equipment. Are we seeing an increasing prevalence of that? Is that relevant or is it very marginal?



Scott Butler: No, it is very relevant. Small electricals is a big palette, so the electric toothbrush is not the same as a tablet, a laptop or a mobile phone, so we will need to do different interventions for different types of electrical items. That sort of activity is certainly very prevalent, very active, and there are a number of other schemes. For example, our research suggests that already 7 million people in the UK have access to small electricals kerbside collections. Whether they know about it or not is another matter, and that is why we have launched our campaign to try to raise that awareness.

Equally, alongside that, we are also investing in local authorities, trying to encourage them to roll out new kerbside collections. Our plans have been somewhat impacted by coronavirus, but we have 19 projects good to go and we are aiming to restart those. That could certainly provide better collection services to around 4 million people, so all the challenges that were posed in the earlier panel, many of them are being addressed and we have lots of work in progress.

Q39 **Chair:** We will come on to that shortly. Adrian, could I just bring you in to give your overview of why we are not hitting these targets?

Adrian Hawkes: I agree with many of the points made by Scott and Louise. Perhaps to add a few others from my perspective, one area I think that has not been covered yet is that we have been concentrating very much on WEEE from households and residential properties. Of course, our system also covers WEEE from businesses as well and a lot of that is very similar to household waste. That is an area that I do not think has been the focus of much attention in the current system and particularly small businesses do find it very difficult to find a suitable and convenient system to dispose of their WEEE in the correct way, because they are generally not allowed into local authority-operated sites. That is one area that could do with more attention.

I absolutely agree with the consumer awareness point and particularly the point that there should be regular, continuous information that is consistent for householders to know what to do and that they are continually reminded about that fact.

Q40 **Chair:** Can I pick up on that for a second? On consistency, given the proliferation of collection contracts in different parts of the country, it is quite difficult to be consistent if the contractors are not remunerated to collect this material and to recycle it, because of the nature of their contract.

Adrian Hawkes: I agree. I think that means that some measures need to be taken to help municipalities—local authorities—to improve the consistency of how they specify those contracts. Clearly that cannot be done overnight because they have generally some period of time to run, but perhaps at renewal time—

Q41 **Chair:** They are normally 25-year contracts, are they not?



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Adrian Hawkes: It is not my specialist area. I think some are, but I think that is mainly for the large volume disposal of bulky waste. The collection arrangements I think can be changed more frequently, but they are still a number of years. I am not saying that it can be done quickly. I do think that is an area for attention, I agree.

Another point I was going to make was about the convenience of collection arrangements in general for consumers. In the first session we talked a lot about the use of the household waste recycling centres, which is a fantastic network that we have in the UK. It is absolutely right that that should be used, increased and promoted, but of course it does not suit everybody. It perhaps does not suit people who are in urban areas who do not have a car or do not have easy access to a site and so on. I do think that there is a good case to be made for having a range of other solutions to that as well. Kerbside collection may be one of those and taking back some material to retailers may be another route, but it should be a combination of measures, not any one measure for everything.

The last point I want to make, which was again touched on in the first session, is important. It is about the lack of a long-term approach within the system, because the whole system is currently dependent on setting targets that do not even come out or are not even finalised until the end of the first quarter in each year, so they are not even known at the start of each calendar year and they are only ever set for one year at a time. This does not give a great background and environment to allow people to plan ahead in a more strategic way as to what might be required for the future, where I would have thought some kind of visibility for say a five-year period would be a much better way forward, then the compliance fee and all of those other measures could be adapted to fit in with that kind of concept.

Chair: Thank you very much, Adrian. Claudia has a couple of specific questions.

Q42 **Claudia Webbe:** Yes, thank you. Probably a question to Louise and just on that issue of the compliance fee. We have heard and we have had evidence that the compliance fee allows, in essence, producer compliance schemes to avoid collecting difficult or expensive electronic waste. As a representative of the scheme, what are your views on this issue?

Louise Grantham: I think the compliance fee has a place within the system. It is worth reflecting on why the compliance fee was introduced. It was introduced in conjunction with the target to deal with some of the issues that we found in the system before it was changed in 2014 where schemes had to, at the time, fund their share of what was collected. If they could not collect enough, they basically had to effectively buy evidence off other schemes or other organisations and it resulted in costs spiralling quite significantly, so much so that it was part of the red tape challenge. Producers were paying costs that were more than they should



have done to reflect the cost of compliance. Ultimately the consumer pays the cost. It came in for a purpose.

Schemes do not just sit back and not collect because the compliance fee mechanism does not have to be set. It is an optional mechanism for the Government. Often it is consulted on during the year so a scheme will not even know what the mechanism will be, if one is set, and the methodology that has been used in recent years has been to set the cost based on the cost of collecting from local authorities, so it is certainly not a low cost. Then there are escalation factors built into the compliance fee to reflect how far away a scheme is from its target. If a scheme does not do anything then the scheme could end up paying double the cost of collecting from local authorities, so it is not a cheap form of compliance, that is for sure. The scheme that sits back and does not collect risks not being able to comply. It is not a simple and cost-free mechanism, so I think sometimes it is misunderstood. Hopefully that clarifies the position.

Q43 Claudia Webbe: I guess it might clarify why you might defend the scheme, but it does not help why there still remains a body of evidence that suggests that those producer compliance schemes avoid collecting difficult or expensive electronic waste. I do not think you have gone to the heart of addressing the difficulties. It is okay defending it, but we need to get to the basis of why there is a problem.

Louise Grantham: I think it comes back to understanding why we have missed the targets and it is a multitude of reasons. Adrian mentioned that the targets are short term. For compliance schemes to invest in perhaps more complex infrastructure, they need more certainty over targets over a period of time and also in their contracts with other organisations.

One of the things I wanted to pick up on were the earlier comments about local authority arrangements. Most of the local authorities are under contracted arrangements between compliance schemes. They do not make regulation 34 requests every time they want to have a collection. I would say that only happens in a very small number of cases, and probably less than 5% of WEEE that is collected from local authorities. It is this short-termism that perhaps prevents compliance schemes from having more complex arrangements in place and ambitious arrangements in place to collect WEEE. That is certainly an issue that we would like to see addressed in any future regulations.

Also trying to make more convenient access points for consumers. Compliance schemes, at the end of the day, are just one of the actors in the system. We need to look at the whole system and where the action should be taken to make depositing WEEE easier for the consumer as well.

Q44 Claudia Webbe: You see no issue with the compliance fee system and the need to reform this at all?



Louise Grantham: It has its purpose within the system, because when you have a target-based system you need a methodology if the targets are missed for some reason. This year, for instance, is a very good example because we have the impact of coronavirus. As you heard on the first panel, we have sites that have been closed for a period of a few months. Certainly for some streams a significant amount of WEEE is collected through local authority infrastructure, so it is a necessary thing for a system where you have targets, most definitely, but there are always ways you can improve things.

Q45 **Claudia Webbe:** Including ensuring that the compliance fee is not just based on recycling costs?

Louise Grantham: At the moment it is based on the costs the producer responsibility legislation places on compliance schemes, which is the cost of collecting and treating WEEE from treatment facilities. It is based on that and then it is escalated as well on top of that. It is reflective of the costs that producers at the moment under the current legislation are responsible for.

Q46 **Claudia Webbe:** With no penalties?

Louise Grantham: The penalty element is effectively an escalator that increases the cost the further away the scheme is from its compliance target. It is not a cheap form of compliance because the way the escalation mechanism works, as I mentioned, is that you would end up paying almost double the cost of collecting and treating WEEE if you did not do anything and you sat back and did not collect. Most schemes with their producers want to try to give their producer some cost certainty. Waiting for a compliance fee is not the preferred option, I would say, of most compliance schemes. Most compliance schemes would want to go out and collect and treat WEEE.

Q47 **Claudia Webbe:** Can I move on to Scott Butler? We have heard a lot about the coronavirus, but I want to know how much of an impact covid-19 has had on electronic waste schemes and e-waste collection in particular. Could you say something about that?

Scott Butler: It was mentioned earlier, but most household waste recycling centres were closed in early to mid-March and we are now starting to see them reopen. Essentially, you have something like eight weeks of material that was not flowing as it would have done previously. We were asked to see what support we could give to the industry, so we pulled together a stakeholder advisory panel. We put together a package for the recycling industry—interest-free loans, unsecured loans—and also a grant package for the reusing community sector organisations, so you not only provide environmental benefits through the reuse and recycling of the equipment, but also social benefits because many of the products that they do refurbish go back into the socially needy communities. We responded in that way.



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We have also launched a new piece of research to have a look at the impact of coronavirus on products being sold. Anecdotally, there is an increase in the sales of bread makers and home gym equipment. Initially there was a little surge in chest freezers that people were buying. We want to see whether that is borne out in the statistics and it is not just anecdotal, and also understand where the waste may have been building up in the system.

Our major concern was around small electricals. We already know that too many small electricals are going into people's black bin bags. As part of our "Recycle Your Electricals" campaign, we did a push around a "Little Spring Clean", advising people if they were decluttering. Our research suggested that 60% of people in the UK were doing that decluttering exercise while in lockdown. We asked people to bag up their electricals ready in time for when they could access the collection network.

We have also built a postcode finder. We are trying to make it as easy as possible for people to find where their local recycling points are and we will add to that ongoing. As Adrian said, it is not just a one-off commitment. We are competing with lots of messages all the time so we will be rolling out different actions and activities to deal with that.

Certainly a lot of the material that was flowing stopped flowing for a little while. Recyclers were struggling because they are a materials-based business and without that material they cannot run their plants. We are now starting to see that change, again anecdotally. We are checking this through more detailed research. Levels seem to be around about 50%, if not a little bit more, of what they would have expected for this time last year, but of course there is a build-up of some of those materials somewhere. The bigger stuff, the washing machines, the dishwashers, the fridges I expect will enter the system because it is a challenge for anybody to deal with, so it almost forces you to think about what you do with it. It is the smaller electricals that we are worried may have been lost forever.

Q48 Claudia Webbe: Have you seen potentially an increase in non-compliant products? Certainly from what I have seen a lot of people have resorted to online buying from all over the place, but there is no notion that any of these products that we are seeing popping up on our screens, whatever we click on—there is always an electronic device that one can buy—there is no understanding of whether any of this is compliant. Are you seeing any difficulties? There has been a drive towards online buying as a result of covid-19, but have you seen any difficulties with non-compliance in terms of those products and what impact that has on electronic waste schemes and so on?

Scott Butler: Not specifically in relation to electricals, but we are doing some research into that now. I have seen it in relation to PPE equipment, for example. There is an issue with online selling in relation to free riders because if somebody is out of the country, they may not be part of the formal system and therefore—not in all circumstances—there



is a greater chance that they will not be registered with the Environment Agency, a member of a producer compliance scheme and therefore not financing their obligations as defined by the regulations. It is something we will know a little bit more about towards the end of July when we have conducted our research. But nothing that has been brought to my attention. That said, we sit within the middle of the system so that level of detail is not something we would normally be looking at. We will do in the research we are launching.

Q49 Claudia Webbe: It is indeed what you have called free riders that I am speaking of, because much of what I have seen certainly being sold and being advertised and popping up in terms of sponsorship on different platforms seems to be from outside of the WEEE system in the UK. I cannot imagine that these would be compliant products because they are sold in the UK, but they are not sold from the concept of the WEEE scheme that we have or system that we have in the UK. When you have more information in relation to that piece of research, it would be useful if that information was able to come back to us here, because I think there has been a significant increase of online purchasing of gadgets and tools and different devices that are not usually in the UK market.

Scott Butler: The compliance is more than just the recycling compliance. It is product safety and other issues and potentially links back to some of the challenges that are being faced around the quality of the product and what impact that could have further down the chain. It is definitely an interesting area.

Chair: Picking up on Claudia's point, this inquiry is not going to conclude until after the summer recess, so there is opportunity, if anybody has research evidence, as Claudia is suggesting, to submit that over the summer.

Caroline Lucas had a supplementary for Louse on the compliance fee, to very quickly close that point.

Q50 Caroline Lucas: I want to push Louise on the issue of whether or not the compliance fee does provide a sufficient incentive to get people to collect the more difficult waste. You argued that it does provide an incentive because of the escalator, but if the escalator is linked to the weight of the product, not on the so-called difficult products to reach, it is not providing the incentive that we want to see. It is not the issue with washing machines. You cannot stick a washing machine in your drawer and hide it, you are going to have to get rid of that, but some of the more difficult stuff is not being addressed by the escalator if the escalator is only operating in terms of weight.

Louise Grantham: My answer to that is that the way the compliance fee is set there is an incentive for schemes to collect, because first of all they do not know if one is going to be set because the Government could choose not to. Then the scheme would effectively be in a non-compliant position and could lose its approval. Secondly, it is not set until the year



has finished, so it could be set at a significantly high level. In recent years it has been set based on the cost of collecting from local authorities, which is typically one of the more expensive ways of collecting WEEE because of the space restrictions, so they tend to be small volumes and the ability to do milk rounds, multiple transport legs, is not often there. So it is not a cheap form of compliance anyway.

The escalator, just to clarify, is a mathematical escalator that is applied to cost, not to weight. If the compliance fee is based on perhaps a cost of £100 a tonne for collecting from local authorities and the escalator is set at 100% of the scheme and a scheme does not collect anything, then it would be multiplied by two so the cost would be £200 a tonne. That is the way the escalator works, so it would be an expensive form of compliance just to sit back and do nothing.

I come back to the point that sometimes we have to look at who is best placed to put mechanisms into place. I think there is an argument to say that there is a role for kerbside. It is something that would be very difficult for schemes to do individually because of all the things I have mentioned. Compliance is often only for a year, so producers sign up to compliance schemes for a year because that is how the WEEE directive is structured.

Q51 Caroline Lucas: We could argue about it for a long time, but the bottom line is that it is not working. It is not acting as the incentive and it does not feel as if there is a sufficient penalty built into the level at which it is being levied. However, I appreciate we have limited time.

Louise Grantham: It is not designed to be a penalty is what I would argue. It is a mechanism to aid compliance.

Caroline Lucas: I think we want it to be a penalty to make it work, because it is not working.

Louise Grantham: I would again refer you back to look at a whole raft of measures that we think would help to increase collection.

Caroline Lucas: As well, but not instead of.

Chair: Thank you. We have the point from both sides of the argument. We need to move on now to talk about the take-back schemes. Thank you, Claudia, for your questions.

Q52 Mr Robert Goodwill: I would like to ask a few questions, initially at least to Adrian Hawkes about changes to the Distributor Take-back Scheme and the importance of retailers taking back old products in the future. Adrian, could you outline what the Distributor Take-back Scheme is and what its success is in funding WEEE services and increasing collection rates?

Adrian Hawkes: The Distributor Take-back Scheme is a part of the WEEE system that has been in existence since the regulations started in



2007. It is an optional scheme that distributors—“distributors” is the term used for what we would call retailers within the system—to join if they wish. If they do join the Distributor Take-back Scheme, it means that they do not have to offer instore take-back of old electrical equipment to customers. If they are not part of the scheme, they are required under the regulations to offer what is called one-for-one, like-for-like take-back. When somebody buys a new product, they would need to offer to take back a similar type of old product for treatment and recycling.

If they do not wish to do that, they can join the Distributor Take-back Scheme. The Distributor Take-back Scheme has been approved by the Government in various phases of operation. The way that it operates is that it takes fees from those retailers that decide to join it and it uses those fees to help support the network of local authority collection sites, which were spoken about in the earlier session by Lee and Gurbaksh. In the early days it provided a significant level of grant funding to those sites—over £10 million over a few years—to enable them to be established. Since then it has continued to provide funding for other collection projects that local authorities have done. That is how the scheme currently works and fits into the system.

Q53 Mr Robert Goodwill: We have already heard from Claudia how online retailers have had a little bit of a bonanza during the lockdown, and retailers are already under siege from online and very much feeling the pinch. I note that DEFRA announced that after 31 September large retailers will no longer be able to join the DTS, and online can seek an exemption. Is that going to further tilt the snooker table in favour of online or does that take into account the realities of online versus retail? Many retailers now see themselves as showrooms for online purchases.

Adrian Hawkes: In my personal view I certainly do not think it will help redress that perceived imbalance, but that only covers a period of one year. The online and smaller retailers are only allowed a one-year extension on their Distributor Take-back Scheme membership. It will, under the current plans, expire completely at the end of 2021 for everybody and the whole system is up for review at that point.

Q54 Mr Robert Goodwill: As far as things I have bought, there are two types of electronic things you buy, the things you go into the shop to buy—we bought a coffee grinder recently. We did not have an old coffee grinder, but certainly if I was going to buy a deep-fat fryer I would not take my old one with me. I might just think about taking my toaster, but a lot of other items are delivered to the door—washing machines and so on—and that gives them the opportunity to take that away. How important do you think the role of retailer take-back in the future would be as we move to a more circular economy, and will it work equally well in the various types of product that we buy? Certainly my experience is we also hoard things. I have loads of chargers and all sorts of things. Can we do anything to try to break that logjam of stuff—the laptop in the attic that we all probably have there until we move house?



Adrian Hawkes: I certainly think that retailer take-back has an important role in the future. It is not the only solution by any means, and it needs to be one of a number of measures that are done to improve the amount of WEEE that is collected. As I mentioned earlier, the system we have of the majority of WEEE being taken back to local authority household waste sites is convenient for some people, but not for everybody. There needs to be something that fills in those gaps in some way and retailer take-back may well be part of that.

I absolutely agree with you that it does not suit all types of equipment and there are different solutions needed for different types and sizes and uses of equipment. The requirement at the moment for it being based on one-for-one, like-for-like also does not particularly help consumers for some of the reasons that you mentioned. In practice, retailers that do offer this service do tend to give some flexibility, so you do not usually have to have the old equipment on the day you buy a new one. They usually allow you a period of time to take it back, maybe 28 days or something like that, which is helpful.

I am sure that it does have a role, but a point that I wanted to make is that does not necessarily mean that it makes sense or is necessary to require it from every retailer all of the time. We know from research that we have done looking at retailer collections in other countries that there is a vastly different take-up of that kind of arrangement, depending on the type of retailer and the facility. Not every store that happens to sell perhaps only a small amount of electrical equipment would necessarily need to offer a take-back service to have an efficient system. The vast majority that comes back through that type of arrangement, where we have looked at it in other countries, comes back through larger grocery retailers, DIY retailers and specialist electronic retailers.

If I look down the high street in a town near where I live, there are many stores that sell some electrical products. I have a Robert Dyas, I have a Mountain Warehouse, I have a Boots, a Co-op, a Sainsbury's, a Superdrug. I do not need all of them to be able to take-back products. What I need is one place in the high street. They are all within the space of a couple of hundred yards and it would not be necessary to do that, but to have some facility that does, that might well make sense as part of a network of improved range of collection facilities in other areas as well. That ought to be looked at in the future. A particular store that happens to sell a small amount of electrical equipment perhaps for specialist Christmas gift lines, for example, is not perhaps a sensible target to expect them to take lots of used electrical equipment back at other times of the year.

Q55 **Mr Robert Goodwill:** Understood. One group we have not talked about, one stakeholder, would be the producers themselves. There have been suggestions from ao.com—Appliances Online—not surprisingly, that the producers should carry more of the burden, as they are the people probably taking the bigger margins on some of these products and the



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people who themselves, in the way they design the products, can have quite an impact on the way that they can be recycled. Do you think that is a non-runner or should we be looking at the producers themselves to fund part of this?

Adrian Hawkes: Producers clearly do fund collections through the mechanisms that others have spoken about, so they have to fund collecting WEEE material from local authority sites, take that to treatment facilities and pay for it to be properly treated. That is what they generally do. In terms of what they could do in improving design and so on, that is an important subject. The current system does not specifically focus on that.

The costs and requirements for producers in the system would be exactly the same if their equipment was easy to recycle or difficult to recycle. There is currently no difference. This is widely acknowledged, and a number of people would like to see some system of what people call modulated fees or something along those lines that would provide an incentive to improve design.

It is worth bearing in mind that that is not perhaps as straightforward as some people might like us to think, because sometimes extending the life of equipment and reusing that equipment may not always make environmental sense. If you think of a refrigerator, for example, keeping a 20-year old refrigerator going longer, which is hugely less efficient than a new model, may not be the best solution, so it is something that needs some very careful consideration in how we design that kind of system.

Q56 **Mr Robert Goodwill:** Yes, I know my television is now 21 years old and I keep being told it is not very efficient, but at least keeping things that long does tend to help.

Adrian Hawkes: If it still works, fine, but when it does break down maybe that is the time to look at something else rather than repair it.

Q57 **Mr Robert Goodwill:** That is what I tell the retailers. Sometimes retailers will do trade-in offers. Do you think there is a role for that: "Bring in your dead toaster, and we will give you £5 against your new one"?

Adrian Hawkes: Absolutely it is an important part of the picture. Some do that now or they have particular campaigns on at particular times. Yes, I am sure that could be part of the picture.

Chair: When you do come to get rid of your television there is a fair chance it will end up in my constituency, being broken down by the only robotic TV and monitor recycling system in the country. I am very glad you have given me the opportunity to mention the Veolia site in Bridgnorth. We are now going to come on to consumer awareness.

Q58 **Ian Levy:** Good morning. Maybe Scott might be able to help with this one. How important is it to increase the awareness of the correct way for



the public to dispose of electronic and electrical equipment, maybe increasing that awareness so that people feel that they are playing their part in this as well? Could you expand a little bit on that, please?

Scott Butler: Yes, it is massively important. It is crucial. We have done various bits of market research and the level of awareness of the fact that electricals can be recycled is less than 50%. We have asked people what they have done with electricals over the last 12 months. Over 50% of them have admitted to putting something in the black bin. When you do that sort of research, people admitting to something that they normally would not like to admit to suggests it is probably more than that. So the consumer is key. The challenge is getting in people's views, because we are competing with all manner of other people trying to communicate with them.

What we are doing with our campaign is being unapologetically positive and vibrant. We are trying to make it normal, for people to feel like it is normal to recycle electricals as they would feel to recycle glass, cardboard and plastic. We are trying to make them as aware of all the various options that are available to them in their local communities through a postcode finder that we will keep building and keep adding to. It is essential to this, particularly around that small electrical part.

We do know—and towards the end of this we will make it available to this Committee—that we will have some firm numbers about the amount of small electricals that are going into black bin bags and also, as has been mentioned by many, the amount of electricals that are being hoarded. One of the Committee members talked about the cables that they have in their drawers. We did a recent study and we think there are enough cables within UK homes to go around the earth five times. That is just the UK alone. There is a lot of valuable material within those electricals that should be and could be utilised and could support the UK economy in terms of jobs and value as well. It is not just an environmental issue, there is a broader issue that needs to go into this. We have a campaign that will run at least until the end of 2022 and we will be pushing people at different points and different times.

A key part of our campaign is working with people's lives. We had a moment in time. The challenge we have had post-corona is those moments in time are not necessarily happening as they used to happen. It was back to school, spring clean, Christmas clear-outs, those sorts of things. Yes, it is crucial.

Q59 Ian Levy: Adrian, could you expand on what some of the reasons are for the low public engagement in electronic waste? I know a lot of people nowadays are happy to recycle their paper and their glass—things that will go into the normal dustbin. Does it have a lot to do with education as well? Maybe we should be starting in the schools to educate from a young age so people realise you do not just recycle waste that can be broken down, like your banana skins and that sort of stuff, but also you can recycle glass and you can recycle electronic waste. Does education in the



schools have a part to play in that?

Adrian Hawkes: I am sure it does. It is not my specialist area, but I am sure it is as part of a programme of education and awareness-raising across the board. Schools would form part of that and there would be other mechanisms as well to raise public awareness, but to get that level of understanding and participation requires a significant and sustained campaign across a number of channels, in my view. We have not had that. We have had bits and pieces, which have been good in pockets, but they have not so far been terribly well co-ordinated or consistent because there has been no requirement for that. I certainly agree, however, that that would be important—essential—to consider for the future.

Scott Butler: We recognise that schools are important, and we were just about to go with a project that was going to look at how schools could be a key part of raising awareness, and they could be collecting points themselves. We had this notion of parents dropping off electricals at the school drop-off. It also gives an opportunity to incentivise some of this stuff, because incentives are important. The value within a toaster to an individual when they return it is not particularly there when it is very lightweight metals and plastics, whereas you can build up those incentives, potentially have schools competing with each other for IT equipment and suchlike.

One thing we adapted for our “Little Spring Clean” was a home treasure hunt. If kids were at home, they could go around the house and try to find any old electricals. The message will be very important, and it is a different message about different points. For example, we now have a psychedelic pink hypnotic cat who is looking to hypnotise the general public into recycling more electricals. It is very mass market—unapologetically so—because that is how we will best get into people’s minds. That project will be revisited at an appropriate time when we have certainty as to when schools will be re-opening and normal life is back.

Q60 **Ian Levy:** Following on from that, on kerbside recycling, I wonder if in the same way that we have bottle banks—when you go to Tesco, Asda or Sainsbury’s—could we have some sort of mechanism like that, where we maybe have somewhere that you could drop your small toaster or your hairdryer into? Anybody in the team?

Louise Grantham: I want to make a couple of comments, if you do not mind. REPIC, which is the scheme I am chief executive of, has done quite a lot of activities with schools over the years trying to engage children and they have proven to be quite successful. We have done the “Pass it On” story where the children have all written a chapter in a book about recycling and they have done recycling videos. We do think that is a good way to go. We have also worked with some local authorities, trying a scratch card type of system, so when people drop off WEEE at sites, they can win electrical goods as a result. I support what Scott said. There are lots of different initiatives.



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One of the issues we have is that WEEE is quite a small percentage of household waste—it is around 1%—so it is competing with other messages on waste that is much more significant in terms of volume, recyclables and green waste. When we are setting a strategy, we need to consider that.

Scott Butler: You asked a question about bring-banks for electricals. There are a number of bring-banks, different schemes, and different producer compliance schemes, and different waste authorities have invested in them. All this is a horses-for-courses thing. There is a right solution for different geographies, different moments. One of the challenges every bring-bank faces is contamination; another is vandalism. I do know of a local authority in north London that recently made a political decision to take away all its bring sites, including for glass and paper, because of those very issues. They were seeing the sites contaminated. It is very difficult to monitor.

In other areas, for example, one of the projects we are funding in the borders, there we are working with an organisation to utilise the community centres as being places for bring-banks. They do have their place, but it is part of a blend of solutions that includes kerbside, household waste recycling centres, retailers and community drop-off points.

Adrian Hawkes: We are aware of a number of retailers who have trialled bank collections for electrical equipment in their carparks, for example, and unfortunately it does not take long for the local unscrupulous population to get into those and start pulling more equipment out than is going in and making a bigger mess, so it is with a note of caution on that. They have a place in some situations but not wide scale probably.

Chair: For our last set of questions we will ask Marco Longhi to touch on extended use of extended producer responsibility.

Q61 **Marco Longhi:** My questions are around the structures for managing e-waste and perhaps I can come to Louise first. The new Environment Bill enables the Government to introduce an extended producer responsibility system for electrical and electronic equipment that charges different fees depending on the impact of different products. How would this affect the current ways we manage e-waste in England?

Louise Grantham: You are referring to eco-modulation and it would look at things such as durability, reparability and recyclability of products. To some extent, the system would not need to be changed to implement this because a lot of it is about producers paying costs according to those sorts of features so the system could continue as it is now.

One of the things that makes it difficult is that waste is a collective responsibility and the products that are being disposed of now are products that were placed on the market five, 10, sometimes 15 years



ago, so we need to have a structure that allows historical waste to be produced and financed. One of the concepts we have been discussing within the UK WEEE system is effectively to modulate a producer's obligation, so rather than charge a fixed fee, which is very difficult when you are dealing with lots of different types of waste from lots of different source, you effectively adjust the share that the producer pays to finance the end-of-life recycling according to how recyclable its products are. The producer is rewarded for the design choices it makes in the waste costs that it pays.

Q62 Marco Longhi: For my next question could I start with Scott? What would you like to see included in the design of an EPR for electrical and electronic equipment? Or would you like to see a different regulatory approach to make producers create products with circularity in mind?

Scott Butler: Louise made a very good point about the fact that the waste management aspect of this is collective and while a producer knows an individual product when it leaves its door, once it enters the world it comes back en masse and that poses a challenge.

What is interesting to me and the industry as a whole is the notion of product versus service. One of the moves into the circular economy is looking at services being provided. For example, when we were talking about the toner cartridges earlier, are you buying a toner cartridge or are you buying the ability to print? If you are buying the ability to print, the business model might be slightly different. I do know that certain companies already have print subscriptions, almost like a Netflix subscription. They monitor and manage the amount of ink you are using, and the subscription is linked to that.

Q63 Marco Longhi: Those sorts of things are quite fascinating. There is an idea around taking advantage of modularity of design, components that can be more easily replaced. You can add on to that things around 3D printing—manufacture could also be very local and the impact that could have on distribution chains across the piece—that are also very interesting, but they are complex. You are talking about moving the oil tanker that is the system in a different direction and that takes time.

Chair: Adrian, would you like to come in on this?

Adrian Hawkes: I would, if that is all right, because, as I mentioned earlier, we do run a producer compliance scheme as well as the DTS and so I do have some knowledge in this area. I have two things to mention on the future design of the system that you were asking about. One is that having a system that takes a longer-term approach will be absolutely critical. We have mentioned this a number of times. People clearly cannot design their products and introduce new products in a short timescale; it takes a number of years, generally speaking, so the factors they need to take into account would need to be planned for well in advance. Also, in terms of collections, schemes need to know what they will be expected to collect, not just this year but for the future years, and what the penalties



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or alternatives would be if they did not collect that amount. It is important to have that set out, whether that is a compliance fee or anything else, so that you know what the consequences would be and what the incentive would be to meet those future targets, which enables much better planning.

The other point I want to mention is that I do think there is a role for looking at how we raise some of the standards, particularly for schemes and operators in this area. You spoke in the first session about the treatment side of it, but there is another area that might be worth looking at. You might be surprised to know that currently—I do not know the exact number—somewhere between 25 and 30 producer compliance schemes are approved at the moment, but currently only about one-third of those collect any WEEE at all from local authorities. The remainder tend to buy and sell evidence of collection from other parties. One of the things that might be looked at is that it should be more of a requirement of the system to have a plan for collection, not just for one year but for a number of years, and how that could be driven forward and expanded. I think that should be looked at.

Scott Butler: As you know, we have a competitive compliance system in the UK. That has been covered off a number of times. That competition yields benefits in certain places and poses challenges in others. Obviously, people have been talking about the compliance fee. What we do is administer the distribution of that fee. We are able to sit in the middle of that system and take the funds raised to do lots of what I think are very important system things that would not have been provided if the compliance fee did not exist. For example, in research what we are looking at now is an investment plan for UK recyclers, which was picked off earlier. We have been able to fund a mass-market consumer awareness campaign, which everybody recognises is needed.

We are looking at the critical rare earth technologies that were talked about earlier, how we could better recover those and how can the UK be positioned to handle them. We were able to put a loan and grant support scheme in place very quickly for an important part of the UK industry. Any future EPR system for the UK needs to bear in mind that there is a place and a space for that co-ordination activity that may not be delivered in other aspects if you continue with a competitive system. I imagine there still will be a competitive element to it.

Louise Grantham: I would like to add two points. The first one, in terms of any future system, is that although obviously we are outside the EU, one thing for producers that is quite important is that they do manufacture for global markets, so a system that required them to take different approaches towards product design, durability and so on that was different to perhaps EU countries would cause issues. I think that is quite an important consideration to bear in mind when we are designing a new EPR system.



One of the things we mentioned and talked a lot about in our submission was the tonnage targets. We think there is also a role for qualitative targets. For all the reasons that we have mentioned—the tonnages of WEEE that are available for collection from change, because of changes in product weight, changes in consumer behaviour—if there was an economic downturn, for instance, consumers may hold on to their electrical products for longer. We might want to look how we can encourage different behaviours, perhaps better sortation of waste electrical appliances at local authority sites so that we have less contamination, so that we can extract more materials at the end of the treatment process. There are other wider things that are worthy of consideration in any future EPR system.

Chair: I want to ask if Matthew Offord would like to come in at all on anything raised in this discussion.

Dr Matthew Offord: No, I am good, Chairman. I think it has been a fascinating morning, listening to all our witnesses. There were certainly some issues around product design that I am interested in, about whether products should be designed with their end of life in mind as part of the process. I particularly liked what Mr Butler said about printing, for example. Are you buying products to perform a function or are you buying them in mind of their end of life? There have been some really good comments and evidence in our session that will be great for our report and inquiry. It has been a great session this morning. Thank you all.

Chair: Thank you, Matthew, for a very good summary. A final word from our debutant on the Committee at this session. Barry Gardiner has one more question about the tonnage issue.

Q64 **Barry Gardiner:** It was to pick up on what Louise was saying about the importance of keeping in step with global requirements. Because technology changes do mean that the weight of individual items will vary and hopefully become less, is that not why the EU system of saying it should be 65% by weight of what is being placed on the market over the average of the last three years makes better sense than simply plucking a tonnage figure out of the air? If you do it by the percentage of what has been placed on the market, you know you are shifting your target with your technology.

Louise Grantham: There are two targets that the EU provides an option for. The 65% of EEE placed on the market is only in the preceding three years and the problem we have is that waste coming back through the system could be 10 years old, 15 years old. Photovoltaic panels have a life of 30 years. While the three-year cycle will pick up some products that have short-term lives, it will not be particularly reflective for longer-life products.

The other target is 85% of WEEE generated, which is a theoretical figure of what could be calculated. The issue we have with that is the models



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that are in the WEEE directive that member states are allowed to use to calculate this figure do not reflect the dynamics of the UK market—the shifting product weights, for instance. Years ago, we had much smaller fridges, now we have much larger ones. To some extent that model we think would work better but with a different model that reflects the UK market dynamic.

Chair: That is a very helpful conclusion. Without wanting to get into a very controversial area for some members of the Committee, it does at least give the UK, now that we are coming out of the EU, the opportunity to create a system that works for the UK. I hope our report will help inform the Government as they look to redesign such a system.

Can I thank all our witnesses in both the first panel and this second panel—Louise, Scott and Adrian—for your very insightful contributions? I thank our Committee members for joining us today and Andrew Bax, the clerk who put together our brief today. Thank you very much indeed, everybody.