

Follow-up written evidence submitted by techUK

1. Why have targets not been met in recent years?

- 1.1. The UK is not alone in struggling to meet the EU target. While there is a data-lag, the emerging evidence is that many EU member states have also struggled. At the International Electronics Recycling Congress in Austria in February, Bettina Lorz from DG ENV confirmed in a panel discussion that the Commission is aware that recycling targets are being missed and would only infract if Member States have not tried to hit targets and that they may have to review targets if most Member States are way off. Tonnages collected seem to have reached a plateau, or even a decline.
- 1.2. The WEEE Directive entered into force in 2003 when product technology and routes to market were very different to now. Even from when it was recast in 2012 significant changes have taken place. The WEEE Directive targets focus on waste generation and do not take full account of changes in technology such as product light-weighting, the extent of the circular economy or the development of a more global market for electronic products which can result in products receiving a second life in another country.
- 1.3. In a report for the Commission¹, stakeholders and regulators highlighted the key risks in meeting future targets: high rate of unaccounted collection activities (80%), limited government capabilities (72%), complex market structure (65%) and inadequate collection infrastructure (51%).
- 1.4. Cherry picking (the selective collection of profitable WEEE), lack of reporting of WEEE managed outside of the producer compliance regime, illegal collection, unaccounted treatment, and illegal treatment were deemed to be “very important” or “critical” elements of these activities.
- 1.5. The Anthesis report for Material Focus highlights significant alignment with that analysis, pointing to: a high-rate of unaccounted collection activities (i.e. commercial asset management reuse operations where activity data is infrequently captured), cherry picking (theft from DCFs and bulky waste awaiting collection), inadequate collection infrastructure (resulting in disposal of WEEE to the residual bin or in skips) and limited government capabilities (failure to prevent illegal exports of WEEE and other waste crime).
- 1.6. Further, we need to consider how we set targets in an environment when products are being designed to new design standards targeting durability, which is earmarked for focus in the next eco-design working plan² and more producers are adopting circular business models. This is likely to require new data reporting frameworks and new methodologies to establish what WEEE will be available for collection in any given year.
- 1.7. Under the WEEE Directive the only target realistically available to the UK government is that based on EEE POM in the preceding three years, and for the reasons set out above this is unlikely to produce a target that represents

¹ pp80-81, UNU et al (2014) *Study on Collection Rates of Waste Electrical and Electronic Equipment (WEEE)* https://ec.europa.eu/environment/waste/weee/pdf/Final_Report_Art7_publication.pdf

² European Commission (2020) *Preparatory Study for the Eco-design and Energy Labelling Working Plan 2020-2024* <https://www.ecodesignworkingplan20-24.eu/documents> and *Task 2: Identification of Product Groups and Horizontal Measures to be Considered in the Inclusion in the Eco-design and Energy Labelling Working Plan 2020-2014* https://drive.google.com/file/d/1unRiIk1uc7IXvZ8_EhEcN0Atd_nTyksl/view

WEEE that will be available for collection. The alternative target, based on WEEE Generated, requires the use of a specified model and it is well documented this is not reflective of the UK dynamic.

- 1.8. Finally, we need to consider how the system structure itself can best support the collection of available WEEE. Could a system based on allocation of local authorities to compliance schemes encourage deeper and longer-term relationships with local authorities? Should PCSs have a duty to manage the collection of WEEE? Should a Material Focus type of organisation be formally established to help overcome barriers schemes face in running national communication campaigns? Will weight-based targets based on an assumption of a continual linear economy drive the right behaviours. These are all important questions that the forthcoming review of the UK WEEE regime should seek to answer.

2. The handling of POPs in the legacy WEEE

- 2.1. Further to evidence presented by NGOs on the handling of flame retardants (persistent organic pollutants – POPs) in legacy WEEE plastics we'd like to highlight work that has been progressed using Compliance Fee funds to identify the presence of brominated flame retardants, including those banned under the Stockholm Convention in WEEE systems.
- 2.2. The research, recently published by ICER³, was co-developed with the Environment Agency and involved rigorous sampling of streams where these substances were suspected and even those where they were not. Samples were subject to both XRF and GCMS analysis.
- 2.3. The research revealed enough POPs-contaminated samples as to lead the Environment Agency to designate the entire streams POPs-notifiable⁴. The research also revealed high levels of antimony in some samples which means that some streams are now also considered hazardous.
- 2.4. In the UK, WEEE plastics are now subject to a density-separation process which effectively enables clean plastics to be separated from those contaminated by brominated-flame retardants. The contaminated fraction is subject to high-temperature incineration to destroy the POPs, whilst the clean fraction is good to sell on secondary markets.

3. The adoption of circular business models by digital device manufacturers.

- 3.1. Whilst giving oral evidence, techUK was asked by the chair of the inquiry to submit examples of producers who have committed to circular business models.
- 3.2. To that end we would like to highlight the following:
 - Gartner indicates that by 2022, 15% of new deployments of on-premises computing will involve pay-per-use pricing, up from less than 1% in 2019⁵.

³ ICER (2020) *An assessment of the levels of persistent organic pollutants (POPs) in waste electronic and electrical equipment in England and Wales* <https://icer.org.uk/research/>

⁴ Gov.UK webpage: *Classify different types of waste: electronic and electrical equipment* (accessed 18/08/2020) <https://www.gov.uk/how-to-classify-different-types-of-waste/electronic-and-electrical-equipment>

⁵ Gartner (2019) *How to Use Consumption-Based Procurement Models for On-Premises Infrastructure*.

- In June 2019, HPE announced its plan to offer its entire portfolio as a Service by 2022⁶.
- In November 2019, Dell announced “Dell Technologies on Demand”, a set of consumption-based and as-a-service offerings⁷.
- This summer, Microsoft has announced its commitment to be zero waste by 2030, eliminating single use plastics by 2025 and increasing reuse at datacentres via a number of Circular Centres⁸.
- A number of other examples, including Canon’s portfolio of remanufactured office products and Sky’s circular economy business model for Sky Q are detailed in techUK’s report from June 2018, *Reuse, Repair and Remanufacturing in the ICT Sector*.⁹

Submitted by

Susanne Baker

susanne.baker@techUK.org

**Associate Director, Climate, Environment and Sustainability
techUK, August 2020**

<https://www.gartner.com/en/documents/3969475/how-to-use-consumption-based-procurement-models-for-on-p>

⁶ HPE Press Release (18 June 2019) *HPE announces plans to offer entire portfolio as a service by 2022* <https://www.hpe.com/us/en/newsroom/press-release/2019/06/hpe-announces-plans-to-offer-entire-portfolio-as-a-service-by-2022.html>

⁷ Dell Press Release (12 November 2020) *Dell Technologies on Demand Offers Consumption-based As-A-Service Delivery Models for Industry’s Broadest Infrastructure Portfolio* <https://corporate.delltechnologies.com/en-gb/newsroom/announcements/detailpage.press-releases~uk~2019~11~20191112-03.htm#/filter-on/Country:en-gb>

⁸ Microsoft Blog by Brad Smith, President of Microsoft (4 August 2020) *Microsoft Commits to achieve net zero goals by 2030* <https://blogs.microsoft.com/blog/2020/08/04/microsoft-direct-operations-products-and-packaging-to-be-zero-waste-by-2030/>

⁹ techUK (2018) *Reuse, repair and remanufacturing in the ICT sector*. https://drive.google.com/file/d/1Mgh7Ls7p5_M6zT-eBtAoEznP6nE1LeqE/view