

## Responses to EAC questions by AATF Forum – 15 October 2020

1. How is the EA's approach to PoPs impacting the sector, and what could they be doing differently whilst still ensuring no harmful chemicals are being put back into the system?
  - a. We believe they been over cautious in their assumptions from a limited sample size. The EA is operating in isolation from other countries we export material to particularly in Europe. Actions and decisions made by the EA have made it very difficult for AATFs to export materials to Europe and beyond as we appear to have reached the different conclusions to other regulators as to what is and what isn't POP's waste. There is also inconsistency across the UK. The position adopted by the EA has not yet been endorsed by the other Agencies who have yet to send out a letter clarifying their positions. There is also a confused position on thresholds of POPs in relation to hazardous waste classification. For instance, an electric cooker is deemed to be non-hazardous on collection because despite the possible inclusion of POPs in printed circuit boards and cable, on w weight basis, POPs would be below the threshold. However, cable removed from the cooker would then have to be classified as POPs hazardous unless texted and any small mixed WEEE is considered POPs hazardous regardless of the threshold test.
2. The number of AATF's as a proportion of total recycling facilities. Is there enough capacity for e-waste treatment. Yes, at present although this is partly due to the low levels of collection in comparison to expectations if collection targets were being increased and met.
  - a. The WEEE industry is under-funded through the lack of investment over the last decade, primarily as there has been no business case to justify the expenditure. Lack of profitability is caused by a number of factors
    - i. Cheap processing competition from abroad, historically China but switching to other far eastern countries
    - ii. Lack of clear regulation and enforcement, the UK is the Worst exporter of illegal WEEE to the African continent
    - iii. Large players in the UK industry who can hold prices "under water" to secure scarce volume being played off each other by many layers of PCS's/waste brokers
  - b. This lack of profitability leaves the industry vulnerable to shocks such as the proposed BAT reforms which may require significant investment in aged equipment to achieve. Without a business case to support this investment, the UK may see the AATF processing capacity significantly reduce.
  - c. It must also be recognised that the permitting and planning systems are extremely challenging, both bureaucratically and financially for WEEE treatment facility development. A permit is currently taking 6 months minimum for assessment and approval with many more complex applications taking considerably longer.
3. Information about what happens with materials after processing in the UK – i.e. further downstream as we discussed. Are there any organisations that keep materials in this country for re-manufacturing?
  - a. Ferrous, aluminium, lead and stainless are smelted in UK with outputs being a non-waste. WEEE plastic is recycled back to end of waste by Enva, MBA polymer and Axion. The EAC could talk to any of these organisation to where they sell outputs – undoubtedly Enva for example sell some of their polymer in bags to UK plastic moulding companies. WEEE shredder mix – now classed as hazardous – is generally exported to smelters in countries such as Canada, Sweden, Belgium and Japan.

4. What more can be done to extract critical raw materials which are in small quantities? What are the challenges to doing so in this country?
  - a. There are insufficient centralised UK initiatives focussed on this. There is a need to develop specialist innovation universities/companies where scientists/chemists can develop the technologies to recover small quantities of critical raw materials from all forms of waste (which are unfortunately not always that valuable) This generates a negative cost model which is unsustainable without strong demand side factors. But this is not just a CRM issue. Gold and silver tend not to be extracted in UK. Sweden and Belgium do (Boliden and Umicore) but as we do not have a strong electronics manufacturing base, demand would be low in relation to the cost of extraction.
5. What jobs potential is there from further investment in high quality recycling that is not energy from waste?
  - a. Massive, but needs certainty of supply and consistency in enforcement. Strong application of the principles of producer responsibility would certainly help for existing schemes, but extending producer responsibility to other streams (eg furniture, mattresses etc) would also help to create a vibrant domestic recycling industry. All current producer responsibility systems are designed to allow producers to meet recycling targets in the most cost-effective way. For packaging, the PRN system creates stronger support for export than for UK reprocessing. For batteries, the system enable targets to be met through the recycling of lead acid batteries and applies very little support for correctly defined portables. And for WEEE, targets that are set to be achievable rather than challenging undermine collection growth, especially with the compliance fee get out.
6. Information about transferable skills from other sectors to high-quality materials recovery from electronics, in particular from high-carbon industries such as oil and gas, chemicals etc. (as mentioned we have heard anecdotally that there is).
  - a. [https://en.wikipedia.org/wiki/Sheerness\\_Steelworks](https://en.wikipedia.org/wiki/Sheerness_Steelworks) A Forum member took on a number of staff from this high-carbon business when closed. Very good calibre of person and many still with them. Frustratingly took a few on for this: <https://www.letsrecycle.com/news/latest-news/worlds-first-leaded-glass-furnace-operational-in-uk/> which was then closed due to this: <https://www.letsrecycle.com/news/latest-news/agency-seeking-evidence-crt-dispute/>
  - b. This illustrates the frustrations of the extremely rigid low-risk positions that the EA can take which often lead to recyclable material having to be landfilled. As an example, a company was using CRT leaded glass in the manufacture of concrete blocks. This was happening for a number of years under approval by the EA, but a revised position was then taken that required the company to submit an end of waste application to the EA. After several years and over £30k in costs, the application was recently refused despite the lack of evidence of any harm to the environment.

**October 2020**