

Material Focus

Response to Environmental Audit Committee's Inquiry: Electronic Waste and the Circular Economy Date 27 May 2020

Introduction

Material Focus (formerly the WEEE Fund), is the public face of a not-for-profit organisation, tasked with distributing funds raised through the use of the UK's WEEE Compliance Fee in 2017, 2018 and 2019. It is registered at Companies House as Joint Trade Associations (Contracts) Limited.

Our strategic priorities are agreed with government following stakeholder consultation. Currently we are focused on four key areas:

- support to local authorities and reuse organisations in rolling out and promoting kerbside and household collections;
- a national behaviour change campaign – Recycle Your Electricals;
- technical research that underpins the UK WEEE system; and
- emergency coronavirus support for AATFs (interest free loans) and charity reuse organisations (grants).

Our goal is to make reuse and recycling of electricals easier, and to support high quality research that will benefit the entire UK WEEE system.

Response to Questions related to the Environmental Audit Committee's Inquiry: Electronic Waste and the Circular Economy

1. Could you explain the factors have contributed to missing targets and the decline in tonnage of electronic waste collected in recent years? In particular could you explain the relative importance of issues related to:

a.Consumer and public awareness;

b.The interactions between the competing producer compliance schemes;

c.How the compliance fee system works, and

d.Theft or fraud during the recycling of electronic waste.

a) **Consumer and public awareness.** During our consultation with stakeholders there was overwhelming consensus that more needed to be done to increase public awareness of the need to recycle their electricals. During 2019 we commissioned IPSOS Mori to conduct research for us which explored UK householders' level of awareness in respect to waste electricals. We found that a significant proportion of householders were unaware of the need to recycle, they didn't know what they should be recycling and where they should take them. There is a clear need to provide householders with clear information on how they can recycle their electricals and, importantly, why.

To meet this need, Material Focus has recently launched the new UK-wide [Recycle Your Electricals](#) campaign. The campaign will be executed over three years, with the first being a test and learn phase. We've attached a presentation which sets out the plan for the coming year and would be happy to answer any specific questions the committee has.

c) **How the compliance fee system works** - The compliance fee is a regulatory tool open to the Government to support the delivery of the UK Waste Electrical and Electronic Equipment (WEEE) regulations. If a Producer Compliance Scheme (PCS) misses their target, they have an option to pay a compliance fee for the tonnage shortfall.

The decision to set a Compliance Fee and how it will operate is assessed on an annual basis. A call for Compliance Fee proposals is issued every year, which are then subject to consultation and scrutiny by a Government panel with final approval. Further details on the methodology for the 2019 compliance fee can be found here on the Defra website.

<https://consult.defra.gov.uk/environmental-quality/weee-compliance-2019/>

The law requires that the compliance fee is set at a level that encourages compliance through collection. The fee therefore complements national targets by creating an additional financial incentive to collect WEEE, because it must be more costly to pay the Fee than to collect it.

In the past three years, the Joint Trade Associations (JTA) methodology has been the approved methodology. It has three core elements: a detailed plan for the practical operation of the Compliance Fee, the methodology to establish the cost of the Compliance Fee, and a plan for how any funds raised through the Fee will be spent. Mazars is the independent administrator of the fee. Joint Trade Associations (Contracts) Ltd (JTAC) was established to oversee the disbursement of the Funds, now externally rebranded as Material Focus. JTAC's board is drawn from the trade associations of the JTA: techUK, AMDEA, BEAMA and The Lighting Association. Its Executive Director is Scott Butler.

Spending priorities are agreed following stakeholder consultation with all funds being invested in projects that support the delivery of the objectives of the WEEE Regulations. Currently there are four key programmes of investment and activity.

- A £3.5 million national behaviour change campaign, [Recycle Your Electricals campaign](#)
- A 3.5 million fund to support rollout of local authority kerbside collections of WEEE. Over £850k has been committed to date across 19 different projects..
- Technical projects and research. An overview of the research that has been funded is available <https://www.weeefund.uk/press-releases> and <https://www.weeefund.uk/previous>. Over £1million has been committed to date across 9 projects.
- Emergency COVID-19 financial support for recyclers (interest free loans) and charity reuse organisations (grants) using the £5.7 million generated by the 2019 WEEE Compliance Fee.

We'd be happy to provide the Committee with further information, if it is of interest.

2.The environment bill in its current form allows for a future extended producer responsibility (EPR) system for e-waste. What would an EPR system reflecting full net costs look like for e-waste and how might it differ from the current system?

The details of what a full net cost ERP system would look like are outside the remit of Material Focus. We would suggest you talk to the electrical producer trade associations, via the Joint Trade Associations, for their views on this matter.

On a more general level, the UK system should have a robust collection network to enable the widespread collection of old and unwanted electricals for reuse and recycling. Currently there are over 2000 different collection points and 7 million of households have access to kerbside recycling for their old electricals. During 2020, Material Focus will be working with local authorities and reuse organisations to extend the number of collection points and increase the number of householders who are able to recycle their old electricals more easily. The planned introduction of in-store retailer take-back in 2020 will also significantly extend the UK collection network.

3. Your organisation is funding some kerbside collection around the country. Could you provide details on how effective you have found kerbside collection to be and what your views on making it mandatory are? Could e-waste be added to the environment bill as another waste stream for mandatory collection from households and business as one proposal we have received suggests?

Behaviour science tells us that to change somebody's behaviour you have to make it as easy for them as possible. Convenience of collection is therefore a key driver for increasing recycling rates. Kerbside does have a role, was identified as a priority for investment by the WEEE Fund and should sit alongside other collection methods such as retailer take back schemes.

Ensuring that there are a number of recycling points that sit alongside the customer journey needs to be factored in in order to ensure a robust collection network. Due to the huge geographical spread of locations, differences in the socio-economic profile of households in the UK and differences in housing types (recycling of all materials from flats can be challenging for example) local authorities are best placed to understand the best collection systems appropriate to their area. This will be a combination of HWRCs, bring banks, community collection points and/or kerbside.

Across the UK, we are seeing a growth in kerbside WEEE collections quite naturally in the market as contracts are being renewed. The funding we are providing is intended to support further growth. We are also working with reuse organisations to extend their collection services and reuse activities to include small electricals. Kerbside funding and reuse support is available for three years. In the first year, we received interest from 39 local authorities and charity sector reuse organisations, and have agreed projects with 19 of these.

We have had to delay the start of the new kerbside and reuse projects due to the coronavirus pandemic. But when we do start them we will collect a range of data to help us measure the effectiveness of these new initiatives. Data will include measuring the increase in electrical waste collected, monitoring awareness levels of the campaign regularly during the year, and the overall effectiveness of the campaign through media monitoring.

The planned introduction of in-store retailer take-back in 2020 will also significantly extend the UK collection network. We have begun discussions with retailers and the British Retail Consortium on how we can support them on communications and awareness raising.

6. Some countries have a mandatory target for the re-use of electronic goods, how would you see this working in the UK?

We do not have a specific view on this, but as a key objective of the WEEE Regulations and with mind to the waste hierarchy we are supporting a number of reuse projects. Material Focus will be investing in a number of reuse projects during 2020 - see above. Using money from the 2019 Compliance Fee, £600,000 in grants have also been made available to the charity reuse sector as part of a post coronavirus financial support package.

In general, passing on working electricals can be a key motivator for change, especially if the householder is hoarding the item and is worried about throwing away something that could be of use.

7. Who should be responsible for promoting greater re-use of EEE Products?

All stakeholders within the lifecycle of the production, retail and disposal of small electricals have a role to play in ensuring the greater re-use of electricals.

Guidance to consumers for repair and reuse forms part of the Recycle Your Electricals campaign. We will continue to add further information on our website on how consumers can do this - via producers, retailers and other organisations who offer these services. We are encouraging repair and reuse organisations to add their sites and services to our postcode finder, see www.recycleyourelectricals.org.uk

8. How can data collection be improved to account for increased re-use within the WEEE industry?

We are investing in a number of reuse projects across the UK. We will be measuring the impact of these projects and open-source sharing the data from these projects.

The WEEE system does currently record evidence for waste electricals (WEEE) reused by many UK AATFs. However, the data capture for used or donated electricals that have never become “waste” is less extensive.

Research commissioned by the Fund which will be launched during the course of the behaviour change campaign, has estimated the amount of reuse in the UK, but with relatively low confidence. This is one area that could be considered for improvement. But it does come with challenges due to the number of charities and SMEs involved, and a lot of reuse is informal – via online sell or share platforms and with family and friends.