

WEEE Legislation: Opportunity or Threat to Community-based Recycling Schemes?

Prepared by Iza Kruszewska, Clean Production Action

Conditions to ensure survival of community-based recycling schemes:

1. Strict implementation of waste hierarchy: prevention – re-use - recycling – incineration – disposal

In Europe, community-based recycling organisations (CBROs) formed a coalition **reuse (Re-use and Recycling European Union Social Enterprises)** and lobbied the EU to ensure that re-use was not discriminated against in the WEEE Directive, arguing the social and economic benefits of reuse (providing EEE to low income groups and more jobs than other waste management options)

See: http://www.recyclingpartner.de/english/complete_text/0201-RREUSE-positionpaper-WEEE_english.pdf

2. Increase the professionalism of CBROs e.g. invest in skills, build capacity, develop financial instruments

3. Build strong alliances with regional and local authorities

Both local authorities and CBROs are locally embedded and able to combine environmental and social objectives, without being driven by the pursuit of profit for shareholders.

Case Studies

Case Study: Furniture Recycling Network, UK

Contact: Craig Anderson

Tel: +44 117 954 3571

E-mail: frn.research@btinternet.com

FRN is an umbrella organisation for 300 recycling groups.

Initially, FRN felt threatened by the WEEE directive, but lobbied to ensure the directive included re-use of whole appliances. Now, FRN sees WEEE as an opportunity for CBROs to grow and become the **local collection organisation**. (It's important for CBROs to access WEEE at point of discard to maximise re-use opportunities) CBROs are forming **partnerships with retailers** (Dixons, Comet) who will have to take back old appliances when selling new; **re-processors and producers** (e.g. Dyson)

CBROs in UK are working with local authorities to build infrastructure to take on collection, re-use and some pre-treatment of WEEE by August 2005 when WEEE directives comes into force. Currently, CBROs and LAs are developing 30 regional collection sites, where WEEE will be repaired, re-used and pre-treated e.g. taking out mercury switches (costs of disposal of mercury switches etc to be borne by producers)

CBROs aim to be self-financing via fees from retailers and producers and local authority grants and contracts. In UK, CBROs have been shown to provide better collection services than LAs, with faster response rates. Producers have recognised that while they are experts at design and assembly, they have no expertise in the reverse logistics of take back.

Case study: Flemish (Belgian) recycling centres (kringloopcentra)

These were first set up in the early 1990s, as an initiative of the social economy sector to re-use discarded household products and provide jobs for low-skilled and long term unemployed. With the support of the regional ministries of environment and employment, LAs are supported by the regional government (of Flanders) to integrate re-use shops in their waste policy. Most LAs have contracts with a re-use shop via contracts to collect re-usable waste with fees to re-use shops for their services (including for training in disassembly of unemployed).

In 2002 there were 40 social enterprises with 90 shops, providing work of 1300 fulltime equivalents, of whom 70% are very low-skilled. In 2001, 20,000 tonnes of discarded EEE was collected (3,4 kg/head) of which over 70% was re-used. Financially, the sector is healthy with most revenue coming from sales and contracts with local authorities. For the 'losses' generated by the people they re-employ, they are compensated by the regional authority. For the moment, the sector is having an important impact on the logistics of collection and centralisation of WEEE.

Source: <http://www.eep.org/newsletters/newsletter100501.htm>

Growing success for Flemish recycling centres

The Flemish system of "kringloopcentra" (recycling centres) grew strongly last year and is expected to grow even faster this year. 17,000 tonnes of discarded items, representing 2.9kg per head of population, were collected in 2000 (+18% compared to the previous year). 70% of the items were reconditioned and sold via the network of 83 secondhand stores linked to the approved recycling centres. Last year, more than 1.5 million customers (+33%) bought about 389 million BEF worth of refurbished furniture, clothing and domestic appliances.

All this is the result of a sustained effort to favour development of this market: a promotional campaign launched by the OVAM and supported by the Stichting Leefmilieu and the CERA Foundation; a reduction of VAT from 21% to 6%; creation of a "Revisie" quality label with a 3-month guarantee (soon to be extended to one year). Last year, 305 of the 308 Flemish communes had a publicly accessible recycling centre, and the equivalent of over 1000 full-time jobs (essentially unskilled ones) had been created. Forecasts for 2001 predict an increase of 15-20% resulting from the combined effect of the interregional agreement requiring the recycling of disused electrical and electronic equipment (DEEE) which will come into force in July, and the more positive public image of second hand goods.

More information: Koepel van Vlaamse Kringloopcentra (Flemish association of approved recycling centres), Filip Lenders, tel: +32 3 281 03 30, e-mail: kvk@kringloop.net, web: www.kringloop.net.

Useful websites:

<http://www.letsrecycle.com/index.jsp>

<http://www.encluster.org/ecluster/documents/Waste.pdf> Peterborough's WEEE re-processing

<http://www.crn.org.uk/networks/membergrps/southwest.shtml>

Telephone conversation with John Redmayne, CREATE, 17 June 2003

Mob: +44 (0)7930 385 751

Office: +44 1931 716 124

E-mail: john.redmayne@createuk.com

CREATE is a UK community-based recycling organisation.

Currently, there is no WEEE implementation in UK – UK govt is likely to leave it until the last minute and will only do the minimum required by the directive.

NL, Sweden, Belgium all have national laws in place; also in Germany, there are recycling schemes operating which were set up by local authorities in early 1990s in anticipation of national legislation, which was delayed due to WEEE directive.

RReuse – European network of network of re-use and recycling groups. (no website)

WEEE directive offers opportunity for recyclers, but implementation will be driven by cost. It will be for community-based recycling schemes to lobby to maintain their niche for community re-use of whole appliances and find their role within the players.

WEEE does not discriminate against re-use (although earlier drafts did), but it also provides no priority for re-use. In Belgian law, re-use was given priority.

If UK govt relies only on corporate compliance (4kg per head) at least cost, the community-based schemes could be threatened. He sees the need for alliances with toxics activists to get better compliance.

On toxics phase outs, John believes no lessons have yet been learned from the fridge fiasco and EU legislation to phase out PCBs. **No one knows which products contain PCBs – especially old end-of-life products which were produced perhaps 10-20 years ago.** In Germany and France, WEEE operations remove all capacitors and dispose of them separately. But, in the UK PCBs in WEEE are ignored.

Telephone conversation with Craig Anderson, Furniture Recycling Network (incl white goods)
Tel: 0117 954 3571
E-mail: frn.research@btinternet.com

FRN is an umbrella organisation for 300 recycling groups.

When EPR policies were first mooted, FRN had concerns that they might be marginalised. However, lobbied hard on WEEE via Rreuse (Craig is RReuse representative) to ensure WEEE directive include re-use of whole appliances. Now, they see WEEE as an opportunity for CBRs to grow and become the **local collection organisation**.

Community based recycling schemes (cbr) have been working primarily with local authorities. However, they are also forming partnerships with retailers (Dixons, Comet), who will have to take back the old appliance, when customer purchases a new replacement. (Retailers have to cover costs of transportation of WEEE from shop to civic amenity site) They are working with re-processors to ensure they consider re-use, lobbying national govt on UK WEEE legislation (which is to be published August 2004) and producers (e.g. Dyson). UK CBRs have managed to persuade the UK govt that re-use is priority.

CBRs are currently building infrastructure to be in place to take on collection, re-use and some pre-treatment of WEEE by 30 August 2005 (when WEEE directive comes into force). They do this by providing free collection of WEEE/furniture to divert the best WEEE for re-use. It's important that CBRs are 'in there' when WEEE first discarded to ensure that storage and transportation don't damage the WEEE, making re-use impossible. In July 2000, FRN prepared guidelines titled "Fit for Re-use".

Currently, CBRs are working with local authorities to develop 30 regional collection sites. In future, they hope to have 60 sites. These are depots for repair and re-use; in future, also pre-treatment e.g. taking out mercury switches etc. The costs of disposal of mercury switches, capacitors etc. is to be covered by producers.

CBRs will be offering free collection. They aim to be self-financing via fees from retailers and producers and local authority grants and contracts. The refurbished WEEE is sold to low income families. Low income groups receive vouchers from local authorities for the purchase of refurbished furniture and white goods.

CBRs have been shown in UK to provide better collection services than local authorities, with faster response rates. Producers have recognised that while they are the experts at product design and assembly, they don't have expertise to provide the reverse logistics of take-back. Since refurbished EEE is sold to low income families, they don't see lost sales.

Craig believes that CBRs can collect as much as 8,5 kg/head (WEEE target is 4kg/head). In May 2003, Hewlett Packard called for a limit to be set in the

amount of waste electronics and electrical equipment (WEEE) to be collected for recycling, but this was firmly rejected by the government.
<http://www.letsrecycle.com/legislation/weeefridge.jsp>

Current pilots running in UK are:

- Peterborough City Council and Compass are setting up localised separation and re-processing of WEEE
- Bath and N.E. Somerset are due to report July 2003 (funded by DEFRA) on lessons learnt from their pilot
- South Gloucester
- Leicester

In France and Germany, there is good infrastructure for collecting and re-using/recycling WEEE, but CBRs are not talking to govts and producers.

US has the RE-DO network which focuses on re-manufacturing and works with EPA.

US participants at Community Recycling Network (CRN) conference were:
Corrie Smith, ED, Materials for the Future Tel: +1 415 561 6530
David Robertson, Philadelphia city council
Christine Seidel, Recycling Council of Alberta

Useful websites

<http://www.letsrecycle.com/index.jsp>

<http://www.encluster.org/ecluster/documents/Waste.pdf> Peterborough's WEEE re-processing

<http://www.crn.org.uk/networks/membersgrps/southwest.shtml>

Telephone conversation with Filip Lenders, KVK, 20 June 2003

KVK is an umbrella organisation/federation of the Flemish re-use centres, who are its members. KVK works to influence govt policy and provides services to its members.

Tasks of KVK-affiliated re-use centres

1. Collection of household WEEE/furniture: from households after receiving phonecall; from civic amenity centres (bulk collected from civic amenity centres) and from small retailers
2. Separation of re-useable from non-reuseables. Collection directly from households yield 40% re-useable (60% non-reuseable); collection from amenity sites yield 5-7% re-useable and from retailers 20% re-useable
3. Repair and refurbishment (no pre-treatment in Belgium, but in France community schemes do de-gassing of CFCs in fridges and separate metals/plastics)

National WEEE EPR legislation was introduced in 2001.

Before 2001, KVK members were contracted by local authorities to collect appliances and reuseables.

After 2001, producers are responsible for WEEE from the moment it has been collected by LA. Producers pay for transportation to sorting facilities and for re-processing of non-reuseables. Since 2001, there is a visible fee on new products (after 10 years, once historical waste has been dealt with, the fee will be abolished)

Visible fee goes to producers and is used to pay LAs, transporters (to bring WEEE to recycling facilities) and KVK when it is part of collection system and transporting WEEE to centralised facilities. Producers don't pay KVK for re-use, separation of useables and non-reuseables, even though this is the first step of treatment (current negotiations on-going)

Currently visible fee is some €20 for a fridge, €16 for a TV and €3-4 for PC (less on PC because of valuable material content)

The producers are using revenues from visible fees also to build up funds for future WEEE obligations, to pay for historical WEEE. The fee will drop once historical WEEE is dealt with.

KVK and its members are not-for-profit organisations, They are not self-financing:

- 40-50% of income is from payment of wages to redeployed people and subsidies for providing training for unemployed
- 40-50% of income is from profits from re-use shops
- 20% if from fees from local authorities and producers (but not retailers)

Filip does not believe that EPR will result in fewer products, as this is not the intention of EPR. It may result in re-design for recycling, but this will not mean longer-life products. There may be a change in materials used and reduced toxics, but this has no effect on energy efficiency or on ability of products to be repaired.

Hence total consumption will continue to increase.

This is **why Europe needs a product policy; EPR is only focusing on the waste phase.**