



The Centre For Business Relationships,
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WEEE need to target consumer behaviour

By Hazel Nash

Managing electrical and electronic waste (e-waste) has hit the headlines for all the wrong reasons once again. The world's largest computer manufacturer, DELL, published findings from a survey undertaken on its behalf which examined the recycling habits of 5000 consumers across the UK, France, Germany, Italy and Spain. The findings suggest that the level of consumer awareness is lowest in the UK towards both the available recycling schemes run by manufacturers, or on behalf of manufacturers, as well as government initiatives established to encourage separate collection, treatment and recycling of waste electrical and electronic equipment (WEEE). As a result, the research found that fewer than 50% of UK consumers recycle their unwanted e-products compared with 80% of consumers in Germany (see, www1.euro.dell.com/content/topics/). The hazardous nature of many components used in consumer electronics increase the importance of disposing of e-waste correctly - for example the cadmium levels in just one mobile phone is enough to pollute 600,000 litres of water.

Whilst these findings should be viewed in context, it is likely that they come as no surprise to UK electrical and electronic equipment (EEE) producers. In research carried out by BRASS on the effectiveness of the UK Waste Electrical and Electronic Equipment Regulations 2006 (the WEEE Regulations) participants involved in both the 2006 and 2008 surveys expressed concern for the level of reliance placed upon consumers in achieving the WEEE ambitions. In fact, over 60% of participants in the 2008 survey considered the UK WEEE Regulations to be ineffective in raising consumer awareness of EEE lifecycle impacts and the take-back schemes in operation for e-waste.

Only through education and recognition of the detrimental environmental impacts associated with inappropriate treatment and handling of WEEE will the WEEE obligations be achieved. The WEEE obligations aim to encourage producers to change the way EEE is produced, used and disposed of by establishing the principle of extended producer responsibility (EPR). Through their EPR obligations producers must facilitate the dismantling, recovery for reuse and recycling of e-waste by

financing the costs involved according to their market share of the product type. Whilst the WEEE obligations focus on the responsibilities of producers and retailers in ensuring the separate collection and treatment of WEEE, they largely fail to address the overarching need to create a virtuous circle in which consumers make sustainable choices which in turn stimulate greater lifecycle thinking and support eco-innovation in the design of products. In this way, consumer awareness is fundamental to the success of the WEEE Directive.

In the UK however, it appears that the effectiveness of the WEEE obligations has been limited by, amongst other things, the Government's reluctance to promote and educate consumers about their role in managing e-waste early on in the transposition of the WEEE Directive into national law. They explained that although public awareness is important in achieving the environmental goals of the WEEE Directive, timing is critical. The Department for Trade and Industry (2003) explained: *Raising expectations of free take-back and greater recycling infrastructure before being fully operational could backfire*. Despite the legitimacy of this concern, set in the context of the WEEE obligations, such a hesitant approach appears to have resulted in a lack of consumer awareness for the environmental effects of WEEE and the existence of infrastructure to deal with this separately.

It is not only at a UK level where improvements need to be made in order to meet the requirements of WEEE, after all the UK WEEE Regulations stem from European law and perhaps this is the best arena in which to address the need to alter consumer behaviour. Following the European Commission's report on the application of the WEEE Directive throughout Member States, which identified a number of technical, legal and administrative problems, the European Commission published their proposal to recast the WEEE Directive in December 2008. A number of proposed actions are put forward within the recast proposal, but the three most significant rely upon consumer awareness. First, the recast proposal aims to increase the target for separate collection of household and non-household e-waste from a weight-based minimum target to a minimum collection rate of 65%, calculated on the basis of the average weight of relevant EEE placed on the market in the two preceding years. Second, it is suggested that the current producer responsibilities are extended

further by requiring Member States to encourage producers to cover the financial implication of the collection of WEEE from private households through their national legislation. Last, Member States may be required to enable producers to show consumers at the point of sale of new products, the costs of environmentally sound collection, treatment and disposal. This provision does not *require* producers to display a visible fee (a separate additional charge for these costs on top of the usual price) on the products but merely ensures provisions are in place in Member States which enable producers, should they so wish, to display the costs of environmentally sound handling of WEEE. BRASS research does, however, suggest that adopting a visible fee will potentially increase consumer awareness about the environmental impacts of waste electronic goods.

These recast proposals seek to strengthen the existing requirements of the WEEE Directive through increasing volumes of separately collected e-waste with producers taking on board the costs of these operations to encourage more sustainable patterns of production throughout the lifecycle of the product. However, the role of the consumer remains a difficult issue still to be addressed. Underpinning the ability to meet increased targets, separate household collections of WEEE and changes to product choices at the point of sale is consumer behaviour. Changing consumer behaviour to support the legal duties of producers requires awareness through publicity and education as well as the clear provision of information on EEE. To this end, the visible fee is a tangible means of providing information on the costs associated with handling EEE at the end of the product's life. The visible fee also creates a definitive and noticeable relationship between the product and the financial implications in managing its environmentally appropriate collection, recovery, recycling and disposal. In addition, the visibility of the fee is likely to incentivise consumers to make use of services they have paid for within the price of the product.

Whether the proposed recast of the WEEE Directive will address effectively the need to alter patterns of consumption is uncertain. However, as it stands emphasis remains on extending producer responsibility which is unlikely to aid changes to consumer behaviour. Politically, addressing consumer behaviour is difficult, particularly when consumers are ill-informed as they appear to be at present. The only way to resolve

the limitations in achieving the intentions of the WEEE Directive is to establish early and effective public engagement, heighten awareness and acceptance towards the importance of separating unwanted EEE from residual waste and to promote an appreciation for the environmental damage that results from inappropriate disposal of WEEE. Requiring a visible fee to be attached to new products would inform consumers at the point of sale and therefore help to raise consumer awareness. As it stands, the proposed recast does not go this far and the provision is unlikely, in its current discretionary form, to bring about the changes necessary to secure the effectiveness of the WEEE Directive since producers will be reluctant to display these financial implications fearful that it may damage their competitiveness in the single market, particularly in the present economic climate.

The extent to which the European Community is prepared to place duties on the consumer remains to be seen through the negotiation and co-decision processes still before the proposed recast. Whether the UK Government will address the need to alter patterns of consumer behaviour to get them onto a more sustainable footing (and how this would be done) also remains uncertain. What is certain however, is that the issue of consumer behaviour will become increasingly important if targets set out in any recast of the WEEE Directive are to be achieved.

References

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