



The Centre For Business Relationships,  
Accountability, Sustainability and Society

WEEE and RoHS Implementation and Impact  
UK Survey  
Initial 100 Responses Summary



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## **Initial Overview of Survey Responses to the WEEE Directive**

This report details a quick preliminary overview of the responses to selected questions concerning the WEEE Directive from the survey “WEEE and RoHS Implementation Questionnaire” that was sent out to electrical and electronic goods manufacturers. As of 24 May 2006, a total of 118 valid survey responses have been received, which have been used to compile an initial overview of the responses thus far.

Section 1 gives an overview of the respondents’ manufacturing sectors, turnover range and company size in terms of number of employees in the UK. The applicable survey questions in this section are:

*Please tick the sectors which correspond with your company’s activities/product groups.*

*Please indicate the applicable turnover range for your company.*

*Number of employees: UK*

Section 2 gives an overview of the costs incurred by companies in preparing to comply with the WEEE Directive, and the costs incurred in the delay in its implementation. Applicable survey questions covered are:

*Did your organisation need to make any financial or other investments (e.g. person hours/physical or capital assets) in order to comply with the provisions of the WEEE Directive and associated regulations? (If yes, please indicate amount below).*

*Has the delay in transposing the WEEE Directive into UK legislation had any financial impact on your organisation in term of realising ‘payback’ (e.g. sunk costs or under utilisation of trained staff) on the initial investment? (If yes, please indicate amount below).*

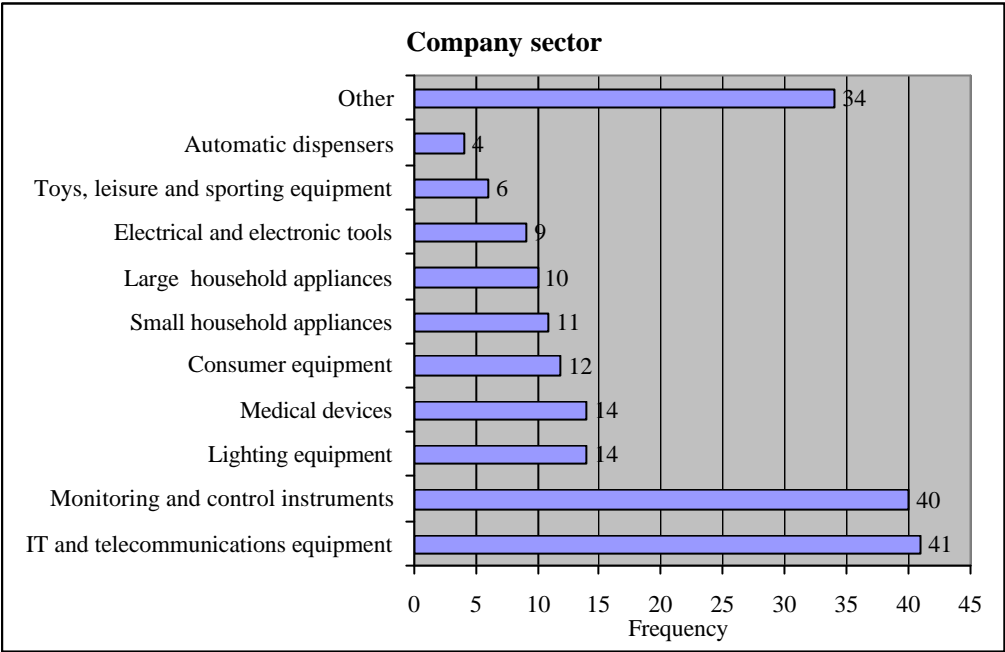
Section 3 gives a broad overview of the qualitative responses obtained to the survey questions:

*We welcome your opinion on both the benefits and the weaknesses of the WEEE Directive – please elaborate below, and feel free to continue on a separate sheet if necessary.*

*What do you perceive as the main successes and criticisms of the UK WEEE consultation process, and the planned transposition and implementation proposals to date?*

**Section 1: Overview of Company Activities and Sizes**

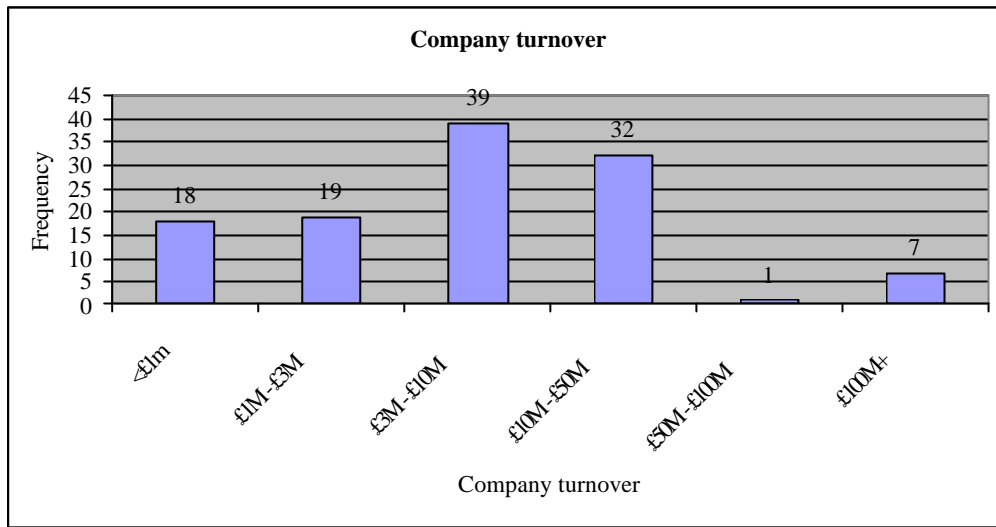
*Question) Please tick the sectors which correspond with your company's activities/product groups.*



**Figure 1** Bar chart showing the products manufactured by companies replying to the survey. The categories are not mutually exclusive, i.e. companies could tick more than one operating sector.

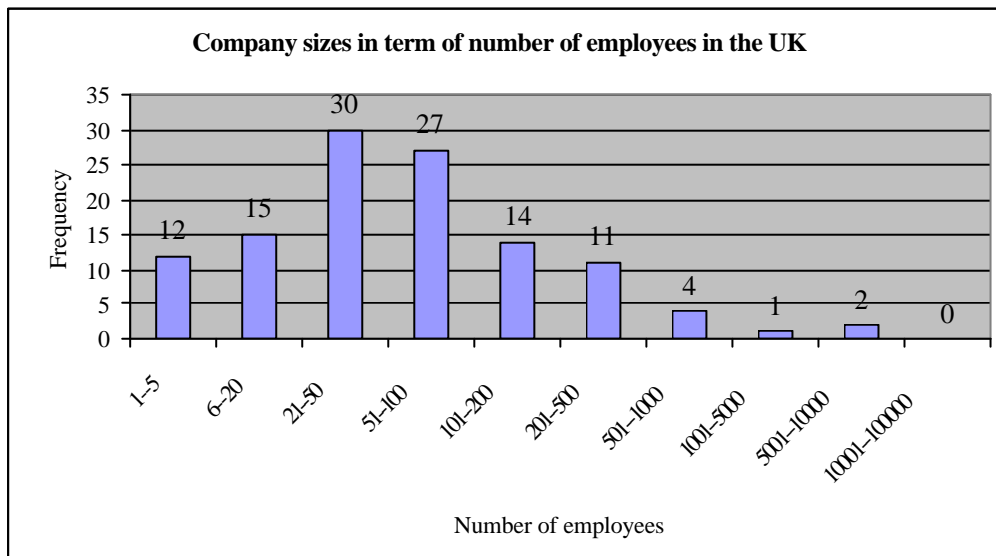
Figure 1 shows the manufacturing sectors which the companies belonged to, these sectors being taken from the 10 categories used in Annex 1A of the WEEE Directive. Both “Monitoring and control instruments” and “IT and telecommunications equipment” companies are particularly well represented in the survey. The relatively high proportion of companies in the “Other” category represents both an array of niche product sectors, and companies which do not manufacture end products and are component manufacturers further back in the supply chain. The components manufactured by these companies will hence end up in products which might fit into one or more of the 10 WEEE product categories.

**Question)** Please indicate the applicable turnover range for your company.



**Figure 2** Bar chart showing the turnover of responding companies.

**Question)** Number of employees: UK



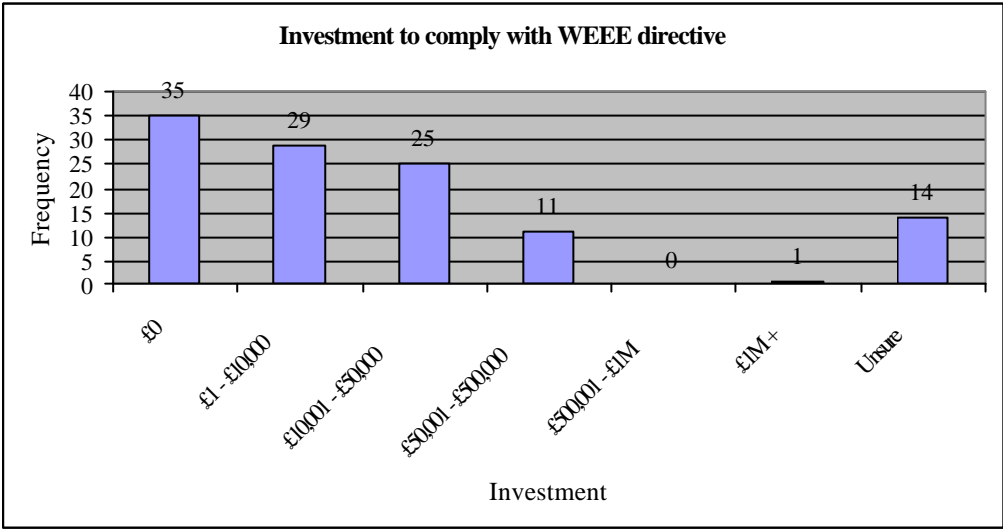
**Figure 3** Bar chart showing the size of the respondent companies in terms of number of employees in the UK.

Figure 3 shows that small and medium sized companies are particularly well represented in the survey, with slightly fewer very small companies and a small, but significant, proportion of large companies. The correlation with company turnover, shown in Figure 2 is clear.

**Section 2: Costs Incurred in Complying with the WEEE Directive and Its Delay in Implementation.**

**Question)** *Did your organisation need to make any financial or other investments (e.g. person hours/physical or capital assets) in order to comply with the provisions of the WEEE Directive and associated regulations?*

A total of 115 (97%) of respondents replied to this question. Of those, a total of 35 (30%) replied “No” and thus are included on Figure 4 as having spent £0 in complying with the WEEE Directive. Companies in this category could consider themselves unaffected by the WEEE Directive, consider themselves already compliant, or could have not implemented any changes to date.

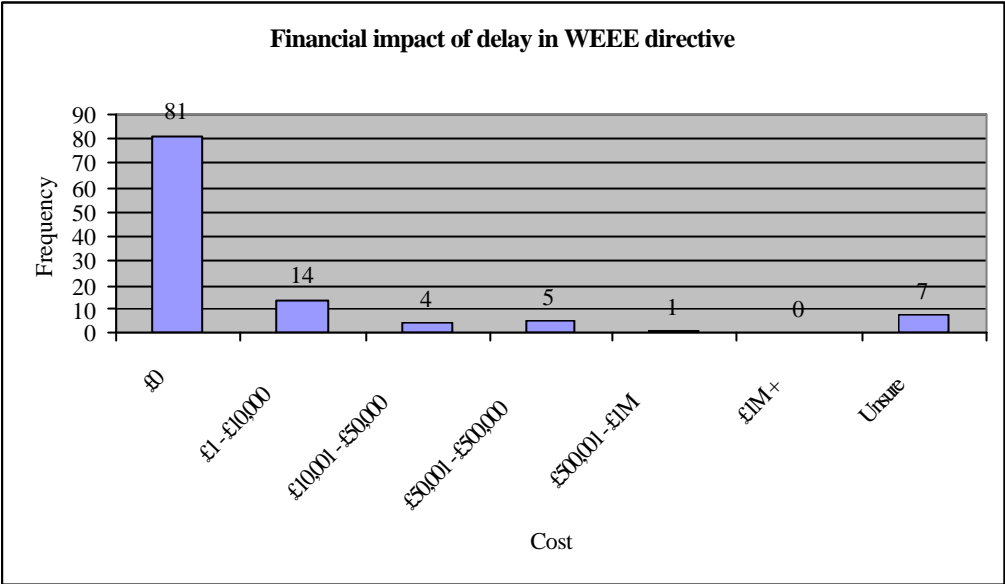


**Figure 4** Bar chart showing levels of financial investment of companies in complying with the WEEE directive.

Of the companies which did incur costs in complying with the WEEE Directive, most spent between £1 and £50,000.

**Question)** *Has the delay in transposing the WEEE Directive into UK legislation had any financial impact on your organisation in terms of realising ‘payback’ (e.g. sunk costs or under utilisation of trained staff) on the initial investment?*

A total of 112 (95%) respondents replied to this question. Of those that replied, 81 (72%) replied “No”, indicating that the delay in the WEEE Directive had not had any financial impact. These companies are therefore represented within the “£0” category in Figure 5.



**Figure 5** Bar chart of the financial impact of the delay in the WEEE Directive.

Of those companies that did experience a financial impact because of the delay to the Directive, the costs tended to be low relative to the total expenditure in compliance, shown in Figure 4.

### **Section 3: Overview of Qualitative Responses to the WEEE Directive Implementation Process and Potential Impacts**

**Question)** *We welcome your opinion on both the benefits and the weaknesses of the WEEE Directive – please elaborate below, and feel free to continue on a separate sheet if necessary.*

Of the 118 responses received so far from the survey, a total of 84 (71%) took the opportunity to respond to this question.

The 34 (29%) respondents who did not take the opportunity to reply to the question could have done so because either: They were ambivalent about the WEEE Directive (and so could be seen to be added to the ‘neutral’ category below), they felt it did not apply to them, they felt their feelings were adequately represented by the previous question, or other e.g. time pressures.

Of the 84 responses received to the question:

- 69 (82%) replies expressed a wholly negative sentiment.
- 15 (18%) replies expressed a neutral, or a mixture of positive and negative sentiments.
- 0 (0%) replies expressed a wholly positive sentiment.

Negative sentiment could be mostly grouped into five broad categories:

- N1) Lack of guidance and awareness of the Directive. (27% of respondents).
- N2) Flawed implementation of the Directive. (26% of respondents).
- N3) Poorly managed introduction of the Directive. (20% of respondents).
- N4) Higher cost burden to manufacturers. (13% of respondents).
- N5) Cynicism as to the aims of the Directive. (5% of respondents).

Positive sentiment tended to be clustered around a single broad category:

- P1) Laudable or necessary aim of the WEEE Directive. (12% of respondents).

## **N1) Lack of guidance and awareness of the Directive**

This point was expressed in some measure by 27% of survey respondents. The points centred around the lack of information and guidance made available to companies, and the lack of awareness amongst the public.

Salient quotes from respondents include:

- *“Nobody seems to even know anything about this. As a business one would think that government etc would contact people and instruct them of the facts.”*
- *“It is a piece of legislation which has been put into place without consultation - particularly with small firms and the general public. Seminars by the DTI if they exist have not been well advertised (and yes we are on the DTI's mailing list!!)”*
- *“No member of the public knows anything about the WEEE/RoHS. WEEE changes by the day, the government themselves seem to think they are above these EU regulations, but us the poor manufacturers have to comply and stand the costs.”*
- *“The lack of public awareness is worrying.”*

## **N2) Flawed implementation of the Directive**

This point was expressed in some measure by 26% of survey respondents. The points covered are diverse; in general most give examples of situations where the Directive will not help towards its stated aims.

Salient quotes from respondents include:

- *“As a company that concentrates on the reuse of IT and telecommunications equipment, we feel very badly let down by this Directive. We have been recycling this type of equipment for 15 years and now this Directive is being steered towards the shredding and destruction of equipment that could be reused.”*
- *“Implementation of WEEE in Europe has resulted in a massive increase in the volume of old PCs being donated to charities for onward shipment to African developing world countries. This inappropriate technology quickly fails in higher temperatures and is then dumped in landfill sites nearby schools and hospitals. The heavy metal contamination is in close proximity to their water boreholes. This lack of responsibility is a disgrace.”*
- *“The WEEE Directive has not been published in any way so consumers do not know what or how things can be reused or recycled. There also appears to be a loop hole in the legislation so the requirement to deal with EEE in an environmentally responsible way is only placed on businesses, if an office environment gives an employee an old computer for home use that employee can throw the computer in general waste without repercussions.”*
- *“An excuse for scrap merchants to rip off anyone trying to dispose of WEEE. Many TVs and computers now dumped at roadside!”*
- *“The WEEE Directive is a great idea in principle which has been rendered almost unworkable in its translation into EU and UK law. Clearly written with the retail sector in mind, yet covering most industry sectors it fails to set out how these other sectors should comply, leaving huge 'grey areas' to be resolved in the courts, assuming anyone is successfully prosecuted, which is unlikely given how many holes and inconsistencies there are in the current legislation. Very unimpressed.”*

### **N3) Poorly managed introduction of the Directive**

This point was expressed in some measure by 20% of survey respondents.

Salient quotes from respondents include:

- *“It's introduction in the UK has been shambolic”*
- *“Impossible to implement at short notice, no nationwide government help or advice has ever been available in realistic terms. The DTI still keep ducking and diving on timelines and the process and what it will actually involve, in short the whole thing has been a shambles.”*
- *“Poorly managed - many would say a complete shambles.”*
- *“The WEEE Directive is very ambiguous and I am unhappy at the lack of useful advice that is available on the subject. It is unclear whether my company is required to register or not. How you actually register is another issue.”*

### **N4) Higher cost burden to manufacturers**

This point was expressed in some measure by 13% of survey respondents. Of particular concern was the cost burden serving to place UK manufacturers at a disadvantage on the global marketplace.

Salient quotes from respondents include:

- *“The WEEE Directive has only served to impose higher costs on UK manufacturers without ensuring that the same higher environmental standards are adequately applied to foreign competition, so putting UK manufacturing at an even greater disadvantage in the global market.”*
- *“Cost to small business in terms of time and resource”*
- *“Take-back of old equipment is big responsibility/cost for producers/suppliers.”*

### **N5) Cynicism as to the aims of the Directive**

This point was expressed in some measure by 5% of survey respondents. The general sentiment was that the stated aims of the Directive are not the primary motive for its introduction.

### **P1) Laudable or necessary aim of the WEEE Directive**

This point was expressed in some measure by 12% of survey respondents. Respondents in this category recognised the aims of the Directive as worthwhile.

Salient quotes from the respondents include:

- *“The WEEE Directive is a great idea in principle...”*
- *“Although the aims and objectives of the WEEE Directive are laudable...”*

**Question) *What do you perceive as the main successes and criticisms of the UK WEEE consultation process, and the planned transposition and implementation proposals to date?***

Of the 118 responses received so far from the survey, a total of 72 (61%) took the opportunity to respond to this question.

The 46 (39%) respondents who did not take the opportunity to reply to the question could have done so because either: They were ambivalent about the consultation process of the WEEE Directive (and so could be seen to be added to the 'neutral' category below), they felt it did not apply to them, or other factors e.g. time pressures.

Of the 72 responses received to the question:

- 59 (82%) replies expressed a wholly negative sentiment.
- 11 (15%) replies expressed a neutral, or a mixture of positive and negative sentiments.
- (3%) replies expressed a wholly positive sentiment.

A total of 8 (11%) respondents appeared unaware that any consultation had taken place. This was typified by quotes of the type

☛ *"What consultation?"*

A total of 6 (8%) respondents raised moving implementation dates as an issue, generating quotes such as

☛ *"It is very difficult to work on something when the dates keep moving!"*

The bulk of the negative comments were focussed on the lack of guidance available, the effectiveness of the consultation and the clarity of the proposals. Salient quotes include:

☛ *"As is the case in all these directives, these can be ambiguous in certain cases, leaving areas of uncertainty. In this case the delay is leaving companies unsure of their position regarding WEEE."*

☛ *"Lack of communication from DTI & Environment Agency. Lack of information available, impossible to get a yes or no answer from DTI."*

☛ *"Lack of practical planning and advice for the small business."*

☛ *"Too much information - requiring a legal mind to comprehend."*

☛ *"The process has not included all stakeholders. The DTI team has changed 5 times during the period 1997-2006, working against continuity and providing a useful excuse for the present team to blame their predecessors - but the process itself was flawed from a project management viewpoint and could be said to have contributed to delays and confusion as a deliberate policy to avoid implementation on time."*

☛ *"Everybody has heard of it, nobody has a clue what it means to them without some serious investigation on their part. This information should be easy to get and simple to understand. IT IS NEITHER."*

☛ *"It has been entirely opaque. It has obviously been full of prevarication and incompetence. No-one in the Environment Agency or the DTI has been able to provide concrete, believable details, even of the timescales."*

## **Summary Conclusions**

This initial summary has been conducted on just over the first 100 replies received to the WEEE and RoHS questionnaire sent out to some 7000 businesses in the UK. While 100 responses may only give an indication of patterns or trends in business attitudes and concerns, we feel that the trends are strong enough to provide some points of interest to stakeholders. Once the final responses have been obtained from businesses surveyed, a final analysis and report will be available.

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