



Small Electrics Pose Giant Problems

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To address the growing problem of waste electrical and electronic equipment, the European Commission has introduced the Waste Electrical and Electronic Equipment (WEEE)¹ Directive. This is due to be transposed into UK law in August 2004, with draft regulations expected in May. But, as has happened in the past with other pieces of environmental legislation², there are worrying signs that the practical implementation of the Directive has been left to the last minute and has not been adequately thought through, which in turn could lead to a number of problems. This comment and analysis concentrates on just one aspect – *the small product issue*.

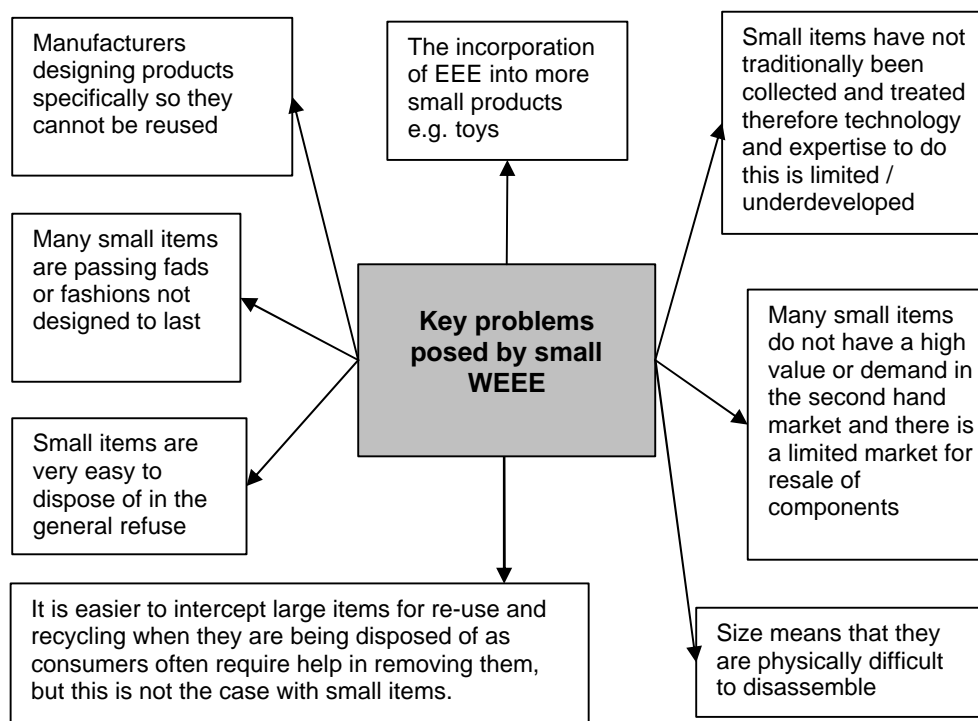
Waste electrical and electronic equipment (WEEE) is recognised as the fastest growing waste stream in the EU, with estimates of 14-20kg per person per year. WEEE is increasing at three times the rate of municipal waste and is predicted to reach 12 million tonnes by 2010 in the UK (Toner, 2002). The European Commission has responded to the issue with the WEEE Directive which sets annual targets for the collection, reuse and recycling of WEEE. The first collection target of 4kg per resident needs to be met by the end of 2006 and there are recycling targets of up to 80% depending on product type, with these increasing over time. Reuse targets have not yet been set but will come online in the future. The requirements of the WEEE Directive will therefore mean changes in the way that manufacturers, retailers, local authorities, consumers and others interact to deal with the collection and treatment of this waste.

In the UK, the Directive is in the final stages of consultation with key aspects still under discussion, such as the scope of products to be covered, the possibility of introducing a clearing house³ and the responsibilities it would have, infrastructure provision and the roles and responsibilities of different stakeholders. It would be unfair to suggest that the government and other stakeholders are not working extremely hard to work out the best solutions and implementation route, especially as certain aspects such as the scope of products have still to be resolved at the EU level. However, a key concern is that the issue of WEEE is not being viewed holistically and integrated with other areas of waste management, and this is especially apparent with the issue of small WEEE.

The term 'small' is used to refer to those products that are portable and can typically be disposed of easily without external assistance, as is often required for larger items. Examples of small items include hand held video game consoles, motorised toy cars, drills, sewing machines, irons, toasters, clocks, hair dryers, shavers, telephones, cellular phones, calculators and laptop computers. The UK is on course to meet initial collection and recycling targets largely through the collection, reuse and recycling of large white goods such as cookers, fridges and washing machines. However, not only is it expected by the European Union (EU) that all designations of WEEE will be tackled, but to meet future targets of the Directive small electrical products need to be addressed. There are also concerns about the fair distribution of responsibility amongst producers, as those who produce items which are easier and cheaper to reuse and recycle may end up subsidising those which are more costly. Additionally, in terms of mass, large products such as washing machines and fridges make up the greatest proportion of WEEE at 77%, (Cooper & Mayers, 2001), but in terms of number, small and medium sized items are the vast majority (Enviros, 2002). Indeed, the number of small electrical and electronic products that are available to consumers is ever increasing as technology improves (See Kleijn, 1999), and more and more small products are having electrical and electronic components incorporated into them, for example toys, diaries and novelty items such as badges, pens, cards and even flashing lollipops.

It is important to draw attention to small products as in addition to the issues above, due to their size they pose a number of unique problems when implementing the WEEE Directive and so require special attention (see Figure 1).

Figure 1: Key problems posed by small product groups



It is only relatively recently that problems associated with WEEE have been focused on and it is still the case that only the large items or those small items with a high residual value, such as mobile phones, have been considered, due in part to the issues identified above. As a result, there is a lack of infrastructure for the collection and treatment of small WEEE, with most of it being disposed of in the household refuse and at civic amenity sites. Worryingly, because of these difficulties, the small product issue appears to have been largely ignored, with the focus centred on those products for which a disposal infrastructure already exists.

Householder involvement in the disposal of WEEE is pivotal to the successful implementation of the WEEE Directive in order to meet collection targets but the current behaviour of householders towards the disposal of electrical goods is essentially dependent on their size. Consumers, more often than not, have to plan how to dispose of large electrical goods and usually require help, for example from the local authority, and perhaps this is why an infrastructure exists for large goods. When disposing of small electrical goods, behaviour is vastly different, as discovered by research conducted by one of the authors⁴. Of nearly 5,000 households surveyed in a major British city, 97% of small electrical goods were not recycled, with the majority being disposed of via CA sites (33%)⁵, or in the household refuse (26%). Additionally when residents were asked about small electrical goods the response given was frequently, "I've never thought about it" and interviewees could not answer with certainty which disposal method they used, with the exception of mobile phones.

When the Directive is implemented, the main responsibility for the collection of electrical goods is most likely to fall on local authorities across the UK as they have a duty to collect waste from their residents and already form a large part of the waste disposal infrastructure. This is still under intense discussion as there are a number of aspects that need to be resolved in terms of local authority and retailer responsibilities, infrastructure and funding provision (see ENDS, 2004 for further information).

From the perspective of local authorities, in order to meet the recycling targets of the Waste Strategy for England and Wales⁶, initiatives are presently being developed to encourage householders to recycle their waste. However, to date, the management of WEEE has been tackled aside from other more general management and recycling issues and there are indications of a lack of integrated thinking which could ultimately lead to a number of problems. For example, schemes are being developed across the UK that encourage householders to recycle goods other than WEEE, (for example, paper, plastic, glass and metals), and if this waste stream is not considered as an integral part of these schemes, then costly changes may have to be made in the future. Efforts are being made by the Government to harmonise different areas of waste management but this is limited and by no means as co-ordinated or spatially comprehensive as required. Therefore, a strategic and integrated approach must be adopted by the UK government and other stakeholders involved in the implementation of the Directive in order to ensure that WEEE is not seen as a separate waste issue. At present it is an ideal time for planning to take place that provides not only for the WEEE Directive and small items, but for future EU directives that will impact on householders as local authorities are making concerted efforts in developing the infrastructure to encourage and empower householders to participate in general recycling activities.

In summary, small WEEE must not be left off the agenda as there is an expectation by the EU that all designations will be tackled and there are concerns that producers of equipment that is cheaper to recycle and for which an infrastructure already exists, at least in part, will be subsidising producers of goods for which this is not the case. Great efforts are currently being made to improve consumer consciousness and recycling rates of other items and so now is a timely opportunity to integrate waste management systems and raise awareness across the board. This is especially the case for small WEEE but there is the danger that if it continues to be seen as a separate issue, this will lead to greater costs and confusion for consumers in the long term.

References

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¹ Directive 2002/96/EC of the European Parliament and of the Council of 27 January, 2003 on waste electrical and electronic equipment (WEEE). Published in OJ L 37/24, 13.2.2003. Brussels: Commission of the European Communities

² For further information see BRTF (2003) *Environmental Regulation: Getting the Message Across*. The Better Regulation Task Force, 2003. Available at <http://www.brft.gov.uk>

³ Clearing House: 'The DTI has endorsed proposals from producers for a national clearing house to coordinate the free collection of WEEE from civic amenity sites on demand and its delivery to treatment and recycling facilities. The system could operate under a set of regional or nationwide logistics contracts which would be awarded by compliance schemes or individually registered producers', (ENDS, 2004). Currently it is unclear exactly how such a clearing house would operate, the extent of its responsibilities and how it would be regulated. For example, some believe that its role 'should be restricted to the registration of producers, the collection of market share data and the calculation of producers' recovery and recycling obligations', (*ibid*).

⁴ See, <http://www.brass.cardiff.ac.uk/Cardiffwastetrialproject.html> for further details of the project.

⁵ Care needs to be taken when interpreting these results as each of the responses could have different implications for recycling. For example, disposing of items to a CA site could be interpreted as being a responsible 'recycling' activity however it is unclear whether householders recycle at the CA sites or whether they just put small WEEE items directly into the general waste.

⁶ DEFRA, 2000. Waste strategy for England and Wales 2000. Department for Environment, Food and Rural Affairs, Published May 2000.