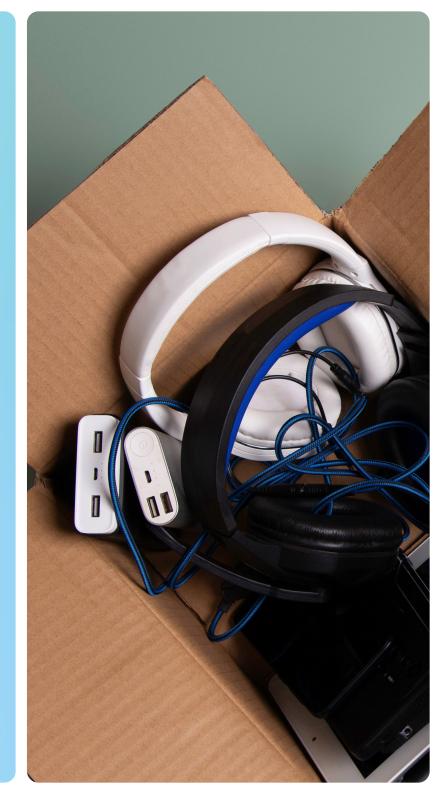


Industry briefing

## Retailer take-back: industry briefing for retailers

March 2024



## No time to read? Key take-aways

- 1. All electrical retailers are legally obliged to help customers recycle their electricals and tell your customers you offer this
  - If you fail to comply with the WEEE regulations you can be prosecuted and fined
  - UK Government is exploring new, strengthened take-back obligations on all retailers, including internet sellers [retailers across Europe already mandated to take back all electricals in-store]
  - Material Focus are receiving an increasing number of customer complaints about their local retailers not taking back electricals which we are passing onto OPSS for follow-up
  - Retailers selling over £100k of electricals (vape sellers: equiv to selling over 50 single use vapes/ day) need to <u>take-back old electricals in store</u> or set up an an <u>alternative collection point</u> instead

#### 2. Consumers are actively seeking out these recycling services

- **Over Im** people a year visit Recycle Your Electricals to find their nearest recycling drop off point
- The majority of UK public tell us they would use supermarket, charity and electrical retailer drop off points if they were available

#### 3. We're here to help!

• Download <u>Comms toolkit</u> from our website, created with **OPSS/Dept for Business and Trade** to ensure your comms are compliant; add your locations to our Recycling Locator to help make it easier for consumers



## Who are <u>Material Focus</u>?

We are an independent, not-for-profit organisation on a mission to get the UK fixing, donating and recycling all of their old and unwanted electricals. And stop precious resources from being lost forever. We do this through...

#### Insights

• Identifying, producing and sharing insightful, timely and impactful research to help build a better UK e-waste/ WEEE system.

#### Investments

• Identifying and funding projects which help make it easier for people to reuse and recycle electricals.

### Inspiration

 Creating and delivering communications which help make it feel easier for people to reuse and recycle electricals through our <u>Recycle Your Electricals</u> campaign.





Ben wants to know what to do with his old electric toothbrush? 

Education

**Give Back January** 

MATERIAL



**Giant toaster bring bank** 



# How do I comply with WEEE/e-waste environmental regulations as a *Retailer*?



## What is e-waste?

- e-waste is known by the industry as Waste/discarded Electrical and Electronic Equipment (WEEE) or more simply *anything with a plug, battery or cable* 
  - Most e-waste contains toxic chemicals and is classed as hazardous waste
  - If not handled properly at end-of-life they pose a major threat to the environment, human health, society, and costs the UK economy through losing precious resources
  - **Recovering materials** like steel, aluminium, copper, gold, silver, lithium and plastics **protects land and sea environments** by reducing the need to mine for new materials
- e-waste is one of the **fastest-growing sources of waste in the world and the UK** 
  - UK householders bin 155,000 tonnes of e-waste every year
  - We are hoarding 527 million items of unwanted electricals in our UK homes
- Anything with a plug, battery and cable should always be recycled as a minimum and should never be binned



## **Retailers vs Producers' responsibilities**



Retailers responsibilities

- Provide take-back service
- Record each electrical item taken-back
- Provide information about the service you offer

Producers responsibilities

- Report on their sales directly or via a Producer Compliance Scheme
- Finance their share of the costs of collecting and recycling waste electricals from public sites
- Provide a drop off option for waste electricals collected by retailers
- Finance the cost of recycling



## Retailer take-back responsibilities - for all retailers selling electricals

- Take-back for recycling accept back customers' items that have the same function when they buy a new electrical item from you, regardless of brand eg -
  - Customer's old kettle when they buy a new one
  - Video player if the customer buys a DVD player
  - Also referred to as take-back on a like for like basis
- Clearly communicate to your customers that you offer this and be able to prove it
- 3 options to deliver this
  - Provide a <u>free, in store, take-back service</u>
  - Join the <u>Distributor Takeback Scheme (DTS)</u> if you sell electricals worth < £100k, or online only
  - Set up an <u>alternative</u>, free take-back service
- If you fail to comply with the waste electrical and electronic equipment (WEEE) regulations, you **can be prosecuted and get an unlimited fine** from a magistrates' court or a Crown Court.

\* Source: <u>Electrical waste: retailer and distributor responsibilities: Take back waste in store - GOV.UK</u>



## Retailer take-back - if you sell electricals online only

<u>Sign up to the Distributor Take-back Scheme</u> (DTS) who manage your take-back obligations on your behalf.

- You pay a fee that covers your waste electrical and electronic equipment (WEEE) obligations until 31 December 2023
- This money goes towards supporting the recycling centres run by local authorities
- Keep a record of what information you give to your customers about where they should take their WEEE



## Retailer take-back - if you sell <£100k of electricals

Sign up to the Distributor Take-back Scheme (DTS) who manage your take-back obligations on your behalf.

- You pay a fee that covers your waste electrical and electronic equipment (WEEE) obligations until 31 December 2023
- This money goes towards supporting the recycling centres run by local authorities
- Keep a record of what information you give to your customers about where they should take their WEEE



## Retailer take-back - if you sell >£100k of electricals

**If your business sells £100,000 or more of electricals** per year and has physical stores you'll need to <u>take back waste in store</u>, or set up an <u>alternative collection point</u> instead.

#### • In-store take-back

- Must be free (but can charge for collecting items from customers' homes)
- Be clearly communicated to customers
- Give customers at least 28 days to bring back their waste item
- Take back all types of electrical and electronic equipment that you sell more and more retailers are choosing to extend the service to cover all electrical and electronic waste
- Brands with multi-site stores selling a variety of different products may need to communicate differently in different stores, and should ensure that store staff advise consumers, that larger goods can only be returned to specific stores
- If your **electrical and electronic equipment sales area is > 400m<sup>2</sup>** including aisle, display and shelf space, you must accept any very small electricals\* at any store, regardless of whether someone buys a new electrical item there



## **TRANSPORT** the electricals collected for recycling

- To dispose of the electricals you've collected you can do one of the following:
  - Speak to a Producer Compliance Scheme (PCS)
    - <u>Contact</u> the PCS and agree arrangements and fees
    - PCS will arrange for the waste to be recycled at an Approved Authorised Treatment Facility (AATF)
    - You may be charged for collection and transportation of the waste to the AATF or the PCS collection point
  - Transport the waste yourself
    - Register as a waste carrier
    - Follow the rules on transporting hazardous waste as 'vapes' are considered hazardous
    - Transport, and drop off the waste at an AATF or PCS collection point yourself
- Keep records of all electrical and electronic waste that you collect and dispose of including the number of units you've received through take-back and say how many of these were returned to a PCS. <u>You can use a template.</u>
  - Include documentation you make, or are given by the PCS or the AATF, when you dispose of electrical and electronic waste
  - Please see the <u>full list of approved recyclers</u>, producer compliance schemes (PCS) and approved authorised treatment facilities (AATFs) in the partner section on our website.
  - You also need to keep records of how you tell customers about your take back scheme.
  - Keep all your records for 4 years.

Note: Vapes are electricals, and should be collected and stored separately from other small electricals and batteries. You can find more information on producer and retailer responsibilities in our <u>vape industry briefing paper here.</u>

• If you sell separate batteries for vapes you must also offer free take-back for batteries



## Minimum requirement for Retailer Take-back communications

Retailers must accept consumers' old electricals in store for recycling - and tell customers about this service. We worked with OPSS/Dept for Business and Trade (DBT) to help ensure consistency across all consumer communications. Our <u>Retailer Take-Back Comms toolkit</u> contains **ready-made and editable assets** and key messaging to enable you to meet your obligations. There are like-for-like, recycle all, and recycle vapes options.

#### Mandatory

- Strut card and poster for use at the checkout/till in-store
- Point of sale comms for use at the points in the store where you sell electricals
- Website copy on how customers can reuse and recycle electrical and electronic equipment
- QR code or web address directing people to your website or Recycle Your Electricals

#### Optional

- Recycle Your Electricals Recycling Locator link or widget most comprehensive and accurate locator
- 'Proud supporter'/'recycle here' available as window decal or stand-alone logo
- Receipt or till prompt
- On-packaging options
- Online point of sale messaging
- 'How to delete data' guide
- Staff training support

#### Supporting docs

• Recycle Your Electricals brand guidelines



## **Retailer responsibilities**

- All *retailers* selling electricals (including vapes) must offer a take-back service for customers, whether you sell the products direct, online, mail order or by telephone
- You must separate, store and keep records of the waste. Also you must <u>use authorised</u> <u>businesses to collect and recycle</u>
- Some retailers will also be considered as *Producers* of electricals. These are retailers who place more than 5 tonnes of electricals on the market in the UK (as an original manufacturer or as the importer)



## **RECORD** the waste electricals that you take back

- You must keep records of all electrical and electronic waste that you collect and dispose of you can use a <u>template</u>
- Include the number of units you've received through take back and say how many of these were returned to a PCS
- You need to keep all documentation you make, or are given by the PCS or the AATF, when you dispose of electrical and electronic waste
- You also need to keep records of how you tell customers about your take back scheme.
- Keep all your records for 4 years

## **Retailers - recording template**

Office for Product Safety & Standards

#### **Regulation 45 Recording Template**

The Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 place an obligation on distributors of EEE to keep records of the WEEE they take back. Please feel free to use the template before for this purpose. These records must be kept for a period of at least four years commencing on the date on which any such record is made and must be made available to the Secretary of State on demand.

DATE ITEMS RECEIVED	(Reg 45(1)) NUMBER OF UNITS	(Reg 45(2)) NUMBER OF UNITS RETURNED TO PRODUCER COMPLIANCE SCHEME (PCS)	DATE RETURNED TO PCS	NAME OF PCS	FOUR YEAR DATE
e.g. 03/01/2015	1	1	10/02/2015		03/01/2019
			4		
	2		č		-

## Other ways we can help

- Industry stats, infographics and assets on fixing, donating, selling and recycling electricals electricals to use in your campaigns
- Consumer research on awareness, attitudes and behaviours relating to electrical reuse and recycling
- <u>'How to delete data' guide</u>
- Promote your electrical reuse and recycling services and offers, provide quotes for press releases and amplify your good work in this area
- <u>List of approved recyclers</u>
- Industry leading Recycling Locator (22,000+ drop off points) and (83,000+ visits/month) + website widget add your stores to help consumers easily locate their nearest recycling drop off points

Ok, let's get you	flyou're ready to recycle, let's start with your		
sorted!	postcode to find your nearest recycling locations		
Just a few steps to find the best place to recycle all	Enter your postcode or address		
your electricals.	Enter a location		
	Use my current location		

#### Or just drop us an email?

Please email Nick Birch, Brand Partnerships Manager, nick@materialfocus.org.uk, to discuss how we can work together to make it easier for the UK public to recycle all their electricals.





Material Focus is an independent, not-for-profit organisation on a mission to save valuable, critical and finite materials inside electricals from going to waste. We do this through...

#### Insights

We identify, produce and share insights to improve the UK e-waste system and inform policy decisions.

#### Investments

We identify and fund projects that make it easier to reuse and recycle; or that encourage circular design.

#### Inspiration

We inspire, educate and encourage the UK public to fix, donate, sell and recycle their unwanted electricals through our Recycle Your Electricals campaign.

#### www.materialfocus.org.uk