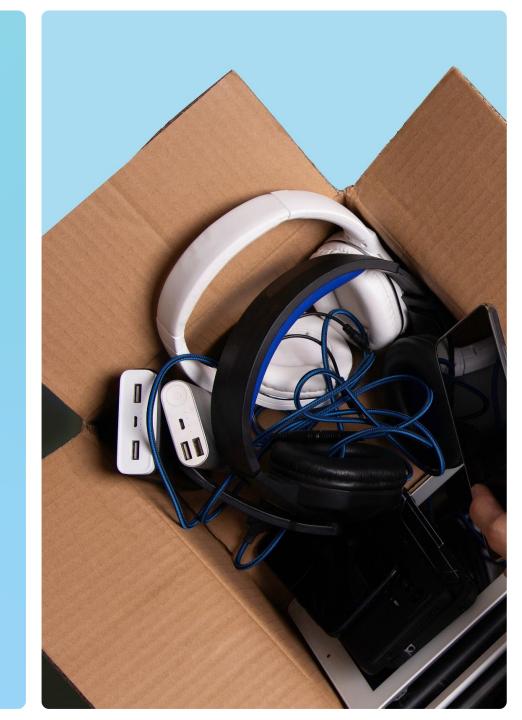


Retailer take-back: industry briefing for retailers

September 2025



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Who is Material Focus?

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

Together with partners we are transforming the UK's e-waste system, and empowering more people to fix, donate, sell and recycle their electricals. For the good of people, our economy and our planet.

We are funded through the UK's Extended Producer Responsibility regulations.





3 key takeaways

Electrical retailer responsibilities

3 key takeaways



Retailers must legally take back old electricals

All electrical retailers are legally obliged to help customers recycle their electricals - and tell your customers you offer this.

Retailers selling over £100k of electricals need to take back old electricals in store or set up an alternative collection point instead.



Consumers are actively seeking out these recycling services

Over 1 million people a year visit Recycle Your Electricals to find their nearest recycling drop off point.

The majority of the UK public tell us they would use supermarket, charity and electrical retailer drop off points if they were available.



We're here to help

Download our <u>comms toolkit</u> from our website, created with OPSS/Department for Business Trade, to ensure your comms are compliant.

Add your locations to our <u>Recycling Locator</u> to help make it easier for consumers to find their nearest recycling drop off points.

What is electrical waste and why is it relevant?



E-waste is one of the fastest growing sources of waste in the world.

What is electrical waste?

Electrical waste/ e-waste is also known as **Waste electrical and electronic equipment** (WEEE).

- Most e-waste contains toxic chemicals and is classified 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 means that we **reduce demand for new materials** that come from mining and drilling and therefore protects land and sea environments.

E-waste is one of the fastest growing sources of waste in the world - and in the UK.

- 103,000 tonnes of e-waste are thrown away each year by households.
- 880 million old electricals stashed away in UK homes.

Binning electricals adds to e-waste. **Anything with a plug, battery, or cable** (including vapes) should always be recycled at a minimum and should never be binned.

Laws requiring producers and retailers to finance and support collection and recycling of electrical and portable battery products at end-of-life have been in place in the UK since 2007.

Source: <u>Material Focus research</u>

www.materialfocus.org.uk

Who are the key players?

Enforcement bodies across the UK

- Environment Agency (EA) England.
- Natural Resources Wales (NRW) Wales.
- Northern Ireland Environment Agency (NIEA) Northern Ireland.
- Scottish Environment Protection Agency (SEPA) Scotland.
- Office for Product Safety and Standards (OPSS) enforces the regulations for distributors and retailers of EEE.

Other agencies

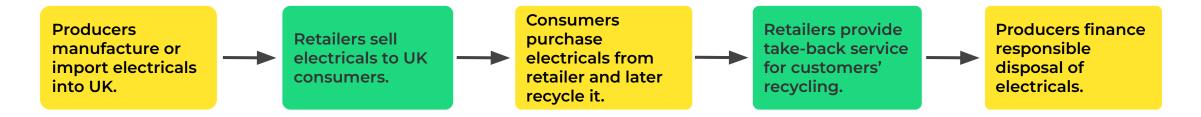
 The Chartered Trading Standards Institute - product safety and compliance.

Retailer and producer responsibilities

If you sell electricals you are defined as a retailer/distributor.

If you manufacture, import, or resell electricals under your own brand you are defined as a producer.

If you do both then you have producer and retailer/ distributor responsibilities.



Retailers responsibilities

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

Producers responsibilities

- Report directly or via a producer compliance scheme on what they place on the market.
- 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 and distributor responsibilities

Retailers selling electricals to UK public must...



Take back old electricals

All electrical retailers must provide a way for customers buying new electricals to dispose of their old electricals on a **like-for-like basis**.

This is regardless of whether you sell direct or over internet, mail order, or telephone.

You must take back items for recycling which have the same function, **regardless of brand**.



Communicate take-back to customers

You must tell your customers which service you provide - and be able to prove it.

You must clearly communicate take-back to customers at the point of purchase.



Keep records for at least 4 years

- Of all electrical and electronic waste that you collect and dispose.
- Of all the documents you make, or are given by a producer compliance scheme or Approved Authorised Treatment Facility.
- Of how you tell customers about your take-back scheme.

Source: Retailer and distributor responsibilities GOV.UK

Options for offering take-back service

Free in-store recycling service

In-store take-back must:

- Be free (but can charge for collecting items from customers' homes).
- Give customers at least 28 days to bring back their waste item.
- Take back all types of EEE that you sell you can choose to extend your service to cover all kinds of WEEE (as more and more retailers are opting to do).

If your EEE sales area is >400m² including aisle, display and shelf space, you must accept any very small electricals* at any store for free, regardless of whether someone buys a new electrical item there.

* items <25cm on their longest side

Alternative free take-back service

- You can <u>set up a 'designated collection</u> <u>facility' (DCF)</u> where your customers can take all kind of WEEE.
- You can do this on your own or with other distributors.
- You must follow the waste electrical and electronic equipment (WEEE) regulations, other waste management legislation, and local planning requirements when managing a DCF.
- You must agree with a <u>producer</u> <u>compliance scheme (PCS)</u> to return the WEEE direct to an Approved Authorised Treatment Facility (AATF).

Distributor Take Back Scheme (DTS)

You can use the <u>Distributor Take Back</u>
<u>Scheme (DTS)</u> instead of providing a take back service, if either:

- Your business sells less than £100,000 of electrical and electronic equipment (EEE) per year.
- You only sell online.

You pay a fee that covers your WEEE obligations until 31 December 2026 and the money goes towards supporting the recycling centres run by local authorities.

The amount you pay depends on the size of your business, whether you only sell online, and how much EEE you sell.

Source: Retailer and distributor responsibilities GOV.UK



In-store take-back: storing and disposing of waste electricals

Check the conditions to see if you can <u>store the waste temporarily</u> before you dispose of it. To dispose of the waste you've collected you can do one of the following:

1. Contact a producer compliance scheme (PCS)

- Contact a PCS and agree arrangements and fees.
- The PCS will arrange for the waste to be recycled or prepared for reuse at an Approved Authorised Treatment Facility (AATF).
- You may be charged for the collection and transportation of the waste to the AATF or the PCS collection point.

2. Transport the waste yourself

- You can transport the waste to an AATF or PCS collection point yourself.
- You need to <u>register as a waste carrier</u>.
- You may also need to follow the rules on transporting hazardous waste in:
 - England and Wales
 - Scotland
 - Northern Ireland

See the <u>list of approved PCSs and AATFs</u>.

Source: Retailer and distributor responsibilities GOV.UK

www.materialfocus.org.uk

Keeping records

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

Retailer take-back communications

You must provide free written information to your customers on:

- Which take-back service you provide, including collect on delivery.
- How they can reuse and recycle electrical and electronic equipment.
- Why this waste needs to be separated from other waste.
- The damaging effects of not recycling electrical and electronic equipment.
- The meaning of the crossed-out wheelie bin symbol.

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).

Shops

You can provide this information by, for example:

- Displaying posters in your store about which service you provide.
- Including information leaflets with the electrical and electronic equipment you sell.

Online retailers

You must publish this information on your website. You can download <u>free customer information</u> if you offer a take-back service. DTS members can get these from the scheme.

Retailer take-back communications toolkit

- Retailers must accept consumers' old electricals in store for recycling - and tell customers about this service.
- We worked with OPSS/ Department for Business and Trade (DBT) to help ensure consistency across all customer communications.
- Our <u>retailer take-back communications toolkit</u> contains ready-made and editable assets and key messaging to enable you to meet your obligations. It includes:
 - In-store and website templates, and internal comms templates.
 - Industry stats, infographics, and assets on reusing and recycling electricals to use in your campaigns.
 - Like-for-like, recycle all, and recycle vapes options.
- Create a free account <u>here</u> to access this toolkit and others, including our specific <u>retailer vapes</u> <u>communication toolkit</u> and our <u>employee engagement</u> pack.



Mandatory take-back communications



Vapes, and anything else with a plug, battery or cable, can be recycled and turned into something new.

Point of sales comms - strut card or poster

You must have a strut card or poster for use at the checkout in-store and/or at points in store where you sell electricals.

Our toolkit offers A4 strut cards/ posters in English and Welsh.



Website copy

Our toolkit includes copy to include on your website about how customers can reuse and recycle electrical and electronic equipment.

It also includes best practice examples.



QR code or web address

Direct people to your website or to Recycle Your Electricals with a QR code or web address.

Find these resources and more in our <u>retailer take-back</u> communications toolkit.

Optional comms support in our toolkit:

- Recycle Your Electricals
 Recycling Locator link or widget to help customers
 locate nearest drop off points.
- 'Proud support'/'recycle here'
 available as a window decal or stand-alone logo.
- Receipt or till prompt.
- On-packaging options.
- Online point of sale messaging.
- Staff training support.
- Recycle Your Electricals brand guidelines.
- <u>'How to delete your data'</u> <u>quide</u>.

If you fail to comply with the WEEE regulations, you can be prosecuted and get an unlimited fine.

The UK government is exploring new, strengthened take-back obligations on all retailers, including internet sellers. Retailers across Europe are already mandated to take back all electricals in-store.

Material Focus is receiving an increasing number of customer complaints about their local retailers not taking back electricals, which we are passing onto OPSS for follow-up.

Find out more about legislation and regulations here:

- WEEE Regulations 2013
- Retailer and distributor responsibilities



Other ways we can help

- Industry stats, infographics and assets on fixing, donating, selling or recycling electricals to use in your campaigns
- Consumer research on awareness, attitudes and behaviours relating to electrical reuse and recycling
- 'How to delete data' quide
- Promote your electrical reuse and recycling services and offers, provide quotes for press releases and amplify your good work in this area
- Industry leading <u>Recycling Locator</u> (nearly 30,000 drop off points and 83,000+ visits per month) and website widget
 - Add your stores to help consumers easily locate their nearest recycling drop off points

Or just drop us an email

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

Who is Material Focus?

We are an independent, not-for-profit saving valuable, critical and finite materials from going to waste by making it easier for everyone across the UK to fix, donate and recycle their electricals.

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.

Frequently asked questions

Q: How is Material Focus funded?

A: Our funding comes from UK WEEE Regulations Compliance Fees. These are paid by electrical producers if they don't meet annual recycling targets set by the government. The fees are set higher than the average costs of collections to encourage collections to take place. We manage spending of the fees to support reuse and recycling of electricals in the UK.

Q: Is Material Focus a regulator?

A: We are not a government body nor a regulator, and work separately to the regulators across the UK. But we will regularly share information with them to help improve the e-waste system - to make it as easy as possible for the public to reuse and recycle their electricals.

Q: Is your work across the UK?

A: We work across the UK. We are a not-for-profit organisation with expertise in the electrical waste sector. Our role is to help improve the UK e-waste system through improving the reuse and recycling rates of waste electricals - this includes working with organisations across the UK sector to increase awareness of obligations and how to meet them.

Q: Who are the regulators in the UK?

A: The <u>Office for Product Safety</u> and <u>Standards</u> (OPSS) enforces the regulations for distributors and retailers of EEE. You can contact them if you have any questions on compliance or suspected non-compliance.

Disclaimer: This document aggregates information from a number of sources and presents it as guidance to enhance understanding of the subject matter. It also provides a link to other third party sites where detailed information and guidance may be available. It is not intended to be definitive report or a substitute for taking professional advice on regulatory, legal and other related issues.

Whilst Material Focus, as an independent not for profit organisation, will make all reasonable efforts to check the accuracy of the information provided, users should use their own professional judgment and discretion when assessing the implications for their organisation and should assume sole responsibility for results obtained and for conclusions drawn.

Explore our other industry briefings



Waste electricals: producer responsibilities and regulations

The environmental obligations for all UK producers of EEE and an explanation of the different responsibilities you have if you manufacture, resell or import electricals.

Read our producer briefing



Waste portable batteries: responsibilities and regulations

A summary of the waste batteries regulations for producers, importers, distributors and retailers of portable batteries in the UK.

Read our portable batteries briefing



Vapes: briefing for producers, retailers and councils

How vape producers and sellers can comply with their legal environmental obligations and how local authorities can access support for vapes that they collect.

Read our vapes briefing