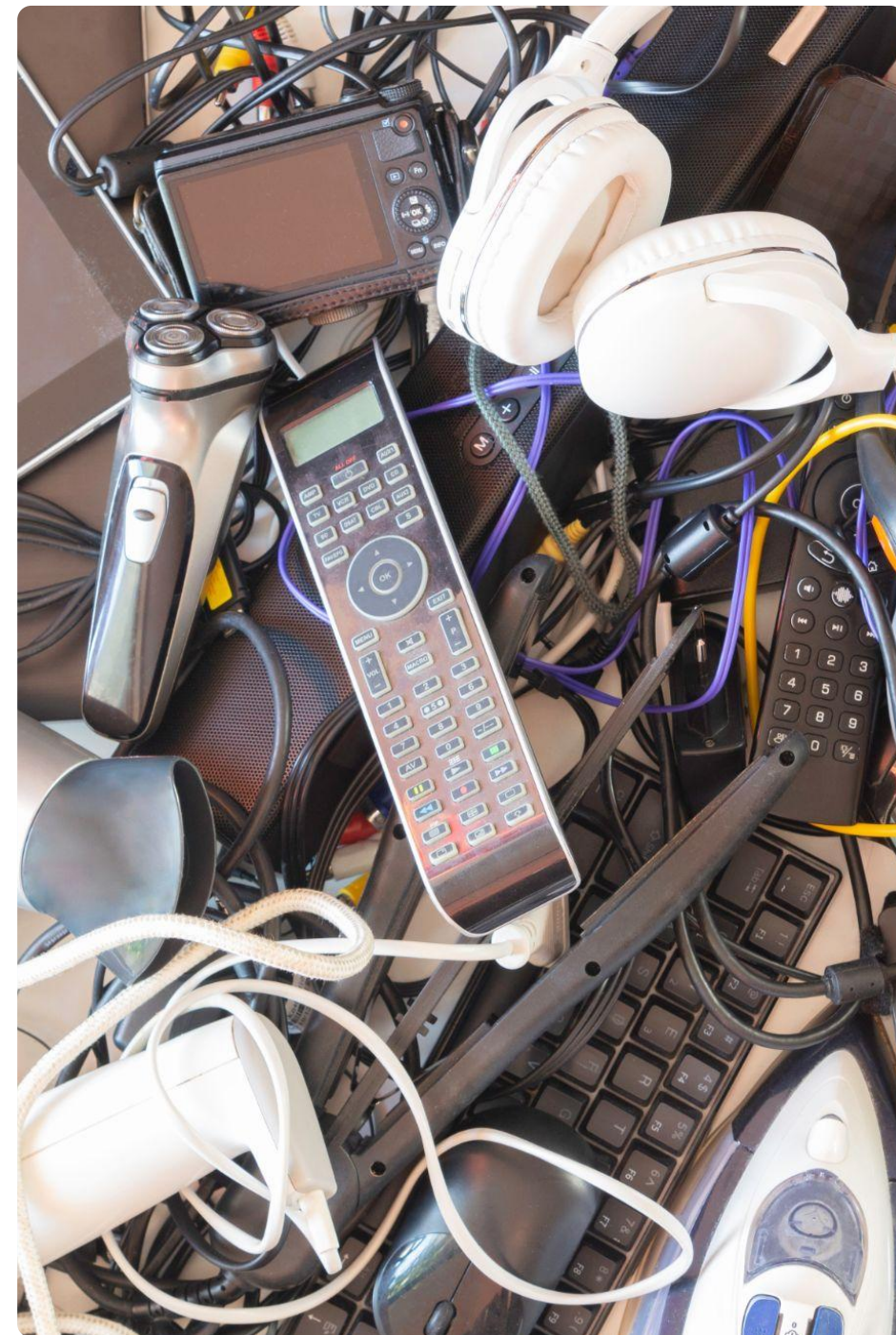




Industry briefing

# Waste electricals: producer responsibilities and regulations

June 2025



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# **3 key takeaways**

Waste electricals producer responsibilities

# 3 key takeaways



## Producer obligations

Producers have a legal responsibility to finance the costs of collection, treatment, recovery, and environmentally sound disposal of old electricals.

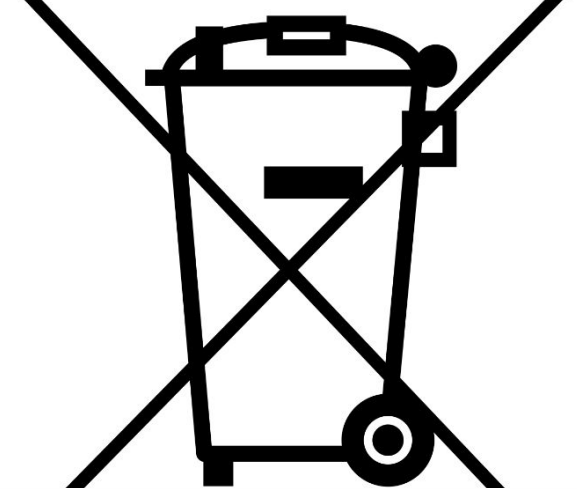


## Register as a producer annually

This depends on how much EEE you place on the market.

**Less than 5 tonnes/ year** - register with your environmental regulator as a small producer.

**5 tonnes or more/ year** - pay to join a producer compliance scheme (PCS) who will take on your obligations.



## Producers must also:

- Mark electrical products with the crossed out wheeled bin symbol and a date mark.
- Provide information on reuse and environmentally sound treatment of the products and components.
- Provide your distributors with your producer registration number.

Source: EEE producer responsibilities GOV.UK

**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.



**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.
- We have 880 million old electricals stashed away in UK homes.

**Anything with a plug, battery, or cable 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 for 15 years.

Source: [Material Focus research](#)



# 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.

# **Waste electricals producer responsibilities**

# Summary for producers



## Producer responsibilities

- Being a producer means you manufacture, resell, or import electricals in the UK.
- Producers of electricals must comply with UK producer regulations.
- Producer responsibilities involve financing the collection, treatment, recycling, and disposal of waste electricals.



## Register as a producer

Producers of electricals must register as a producer annually, depending on how much EEE you put on the UK market in the previous calendar year.


- **Less than 5 tonnes** - register as a small producer with your national environmental regulator.
- **5 tonnes or more** - join a producer compliance scheme (PCS).



## Additional responsibilities

You must also comply with:

- Battery producer obligations - if your products contain batteries.
- Distributor obligations - if you are selling electricals directly to consumers.

A hand is shown reaching into a cardboard box, pulling out a black electronic device, possibly a camera or a small monitor, which is connected to various cables. The background is a solid light blue color.

**If you put EEE on the UK market you must follow rules on both the EEE you sell and the EEE that becomes waste (WEEE).**

## Who are EEE producers?

The first UK registered company who places EEE on the market is the 'producer'.

You're a producer of EEE in the UK if you:

- Manufacture and sell EEE under your own brand in the UK;
- Resell equipment made by someone else under your own brand. (If the maker's brand appears on the equipment they are the producer);
- Import EEE on a commercial basis into the UK;
- Are established outside of the UK and supply EEE directly to the UK market by distance selling (for instance online, mail order, by phone).

You are not a producer if you buy an item of EEE abroad and bring it into the UK for your own use.

### What is EEE?

Electrical and electronic equipment (EEE) is dependent on electric currents or electromagnetic fields to work properly. Products that are not connected to a mains supply may still be EEE. They can be wind-up, battery-powered, and solar-powered products.

To decide if your product is EEE, see guidance on [how to correctly identify EEE](#).

Source: [EEE producer responsibilities GOV.UK](#)

# When is EEE ‘placed on the market’?

EEE is placed on the market the first time it becomes available for distribution or use in the UK.

This is when there is a transfer of ownership from a:

- UK manufacturer to a UK distributor.
- UK manufacturer to the final UK consumer or user.
- Manufacturer outside the UK to an importer in the UK or the person responsible for distributing the item in the UK.
- Manufacturer outside the UK, or formal representative, direct to the final user or consumer.

Transfer of ownership can be by:

- Sale.
- Loan.
- Hire.
- Lease.
- Gift.

You are the person that places on the market if you are the first person in a supply chain professionally making EEE products available for supply or sale in the UK.

You do not have to receive payment.

It is not the act of supplying or selling the EEE products that determines if it has been placed on the market. It is making the product available for supply or sale.

The person placing on the market may be:

- An individual.
- A corporate body such as a company.
- A not-for-profit organisation such as a public body or a charity.

Placing on the market **does not** include EEE products that are:

- Made in the UK and then exported without being placed on the UK market.
- Imported and then exported without being placed on the UK market.
- Imported where there is evidence that the products were always destined for import, such as those with non-UK voltages, specifications, packaging, or instruction booklets.

Source: [Report the amount of EEE you place on the market GOV.UK](#)

# What you must do as an EEE producer:

## Register as a producer annually

This depends on how much EEE you put on the UK market in the previous calendar year (also known as a compliance year).

- If you place **less than 5 tonnes** of EEE on the UK market in a compliance year, you can register direct with your environmental regulator as a small producer.
- If you place **5 tonnes or more** of EEE on the market, you must join a producer compliance scheme (PCS).
- The **PCS then takes on your obligations** to finance the collection, treatment, recovery, and environmentally sound disposal of household WEEE collected in the UK.

## Information and records

- Mark all EEE products with the **crossed out wheelie bin symbol** and a date mark.
- Provide information on reuse and environmentally sound treatment of the products and components (includes materials, dangerous substances and preparations) within one year of putting them on the market.
- Make sure that distributors you supply have your producer registration number.
- Keep **records for at least 4 years** of the amount of EEE put on the market by category.

## Improve product design

Producers should aim to improve product design to facilitate recycling and reuse of components and materials.

See guidance on the restriction of the use of certain hazardous materials (RoHS) in electrical and electronic equipment.



# Less than 5 tonnes - register as a small producer

- If you place **less than 5 tonnes** of EEE on the UK market in a compliance year, you can **register direct with your environmental regulator as a small producer**.
- Register through the **WEEE Online service**.
- You must register by 31 January every year or within 28 days of placing EEE on the market for the first time.

Source: EEE producer responsibilities GOV.UK

# Registering as a small producer

## Business location

You will be asked for your business location and the system will identify the relevant regulator depending on your location:

- Environment Agency (England).
- Natural Resources Wales (Wales).
- Northern Ireland Environment Agency (Northern Ireland).
- Scottish Environment Protection Agency (Scotland).

## Amount of EEE placed on the market

When you register, you need to state how much EEE you placed on the market in the previous calendar year by category.

See guidance on how to:

- Report the amount of EEE you put on the market.
- Correctly identify EEE.
- Correctly identify B2C and B2B EEE and WEEE (household or non-household waste electricals).

## Or use a third party

You can also:

- Use a third party to register you and submit your data.
- Use a PCS as a third party and not register as a member but it **will not take on your legal obligations**.
- Or you can choose to register as a full compliance member.

Source: EEE producer responsibilities GOV.UK

# Registered as a small producer but place 5 tonnes or more of EEE on the market?

- If you're registered as a **small producer** and find you **place 5 tonnes or more of EEE on the market in a compliance year**, you must notify the relevant environmental regulator and join a compliance scheme within 28 days.
- You can **apply for approval to become a PCS** where you will be the only member.
- You may also have a producer obligation to finance the cost of collection, treatment, recovery and environmentally sound disposal of non-household EEE arising from end-users.

Source: EEE producer responsibilities GOV.UK

## 5 tonnes or more - join a producer compliance scheme (PCS)

- If you placed **5 tonnes or more of EEE on the UK market** you must join a PCS.
- You must do this by **15 November each year**.
- If you enter the UK market after 15 November, you must join a PCS within 28 days of putting EEE on the market.
- You must also be a member of the PCS in the compliance year immediately after the last compliance year in which you put **5 tonnes or more** of EEE on the market in the UK.

Source: [EEE producer responsibilities GOV.UK](#)



# Producer compliance schemes

See a [list of approved PCSs](#) and check which services meet your needs.

If you put both household and non-household EEE on the market you can join two schemes, one for each. Or you can join one scheme for both.

The PCS will charge fees for its services. This includes fees for collection and treatment costs of WEEE on your behalf.

You must give your PCS information about your business. You must provide the amount of EEE you placed on the UK market by category as requested by the scheme.

See guidance on how to:

- [Report the amount of EEE you place on the market.](#)
- [Correctly identify EEE.](#)
- [Correctly identify B2C and B2B EEE and WEEE \(household and non-household waste electricals\)](#)

You are not a producer if you buy an item of EEE abroad and bring it into the UK for your own use.

## What the PCS does on your behalf

The PCS takes on your obligations to finance the collection, treatment, recovery, and environmentally sound disposal of household and non-household WEEE collected in the UK.

Source: [EEE producer responsibilities GOV.UK](#)

**You must join a PCS if you place 5 tonnes or more of EEE on the UK market in a compliance year.**

# Household vs non-household EEE

## Household EEE

A PCS is given a collection target for its whole membership for each compliance year.

Each producer is responsible for financing a portion of that target based on its market share in each of the 14 product categories of EEE it sells.

The PCS reports the information needed by the relevant environmental regulator every 3 months.

## Non-household EEE

The PCS takes on your financial obligations for non-household WEEE arising in each compliance period from:

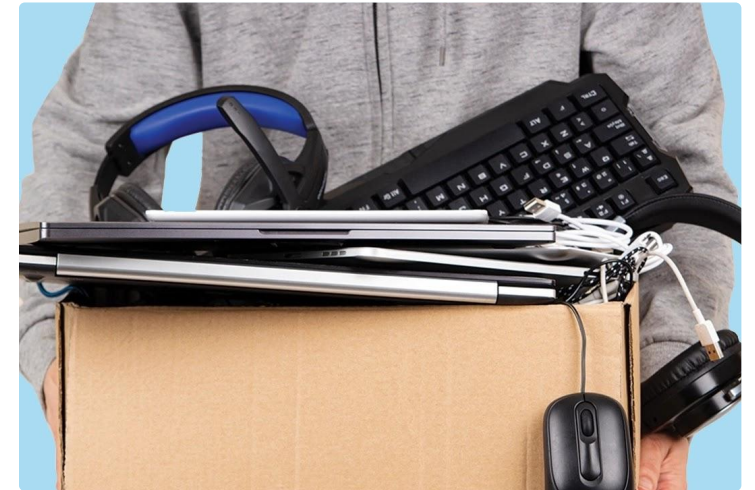
- EEE a producer placed on the market on or after 13 August 2005.
- EEE that was placed on the market before 13 August 2005, regardless of the producer, which the user is replacing with equivalent new EEE.

This applies unless alternative arrangements have been made between the producer and the business end-user.

The PCS reports the information needed by the relevant environmental regulator once per year.

## Guidance

See the guidance on [how to correctly identify B2C and B2B EEE and WEEE \(household and non-household electrical waste\)](#).



Source: [EEE producer responsibilities GOV.UK](#)



# Non UK based producers

- Before putting EEE on the UK market, producers based in other countries must either appoint an authorised representative based in the UK or join a UK approved PCS.
- This must be done in time for the relevant compliance period.
- UK based producers that put EEE onto the market of other member states can appoint an authorised representative based in that state rather than registering as a producer there.

Source: [EEE producer responsibilities GOV.UK](#)

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If you do not register as a small producer or join a PCS you are committing an offence and may face enforcement action.

**Find out more about legislation and regulations here:**

- [WEEE Regulations 2013](#)
- [Producer responsibility regulations](#)

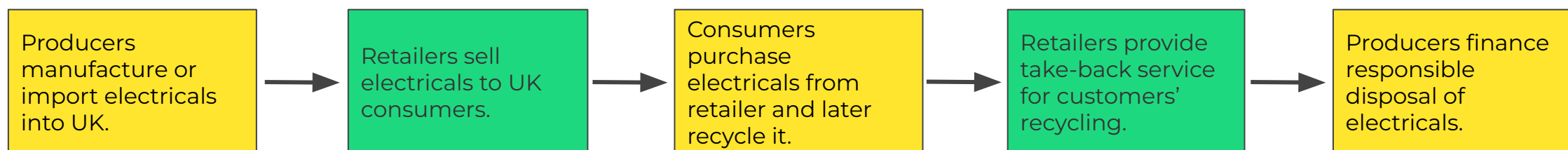
Source: [EEE producer responsibilities GOV.UK](#)

# **Distributor and retailer responsibilities**

# If you sell EEE direct to households in the UK...

You must also take on distributor responsibilities if you sell EEE direct to households in the UK.

You can find out more about retailer and distributor responsibilities in our retailer briefing paper on our website here.



## ***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.

**However, if you do both, then both producer and retailer responsibilities will apply.**

# Government update

Producer responsibility consultation

# Response to the producer responsibility consultation

A consultation on reforming the producer responsibility system for waste electricals was held between December 2023 and March 2024.

[Update to the regulations to be introduced in the UK from \*\*2025\*\* onwards.](#)

## 1. A new category for vapes

Separate data reporting and collection targets to be established for vapes.

## 2. New obligations for online marketplaces

Online marketplaces will be required to take on producer obligations.

Source: [Producer responsibility consultation](#)





# 1. A new category for vapes

- Vapes are currently reported under Category 7 which covers toys, leisure, and sports equipment.
- A new category for vapes and vape-related products means that separate collection targets for these products will be set under the WEEE reporting obligations.
- **Vapes producers will need to report the weight of products placed on the UK market under this new category.**

Source: *Producer responsibility consultation*

## 2. New obligations for online marketplaces

- **Online marketplaces will take on obligations that currently apply to companies defined as producers within the existing regulations.**
- The new requirements will apply to online marketplaces only in respect of the equipment placed on the UK market by their overseas based sellers.
- This means that they will contribute to the cost of collection, treatment, re-use, and recycling of waste electricals.

Source: Producer responsibility consultation

# **Frequently asked questions**

# 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: Your relevant regulator is dependent on your company registered address location:

- **Environment Agency (England)**
- **Natural Resources Wales (Wales)**
- **Northern Ireland Environment Agency (Northern Ireland)**
- **Scottish Environment Protection Agency (Scotland)**

**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 a 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.

We are an independent,  
not-for-profit organisation **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.