SUSTAINABLE INSIDER

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www.wastecare.co.uk



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Chairman's Message

Welcome to the second edition of The Sustainable Insider.

This year has certainly got off to a great start. Despite the daily news of conflicts across the world, global warming, and reminders of the nation's increasing national debt, there are



encouraging signs that green shoots are taking root across the economy. For us at Wastecare, in the last three months we have seen a 28% year-onyear increase in new enquiries and on-boarded collection points.

At long last Defra have commenced the consultation for new regulations for the collection and recycling of WEEE. With a general election looming it is likely any changes will be delayed, however we sense the government are keen to deal with some of the problems with the status quo this year. We all have an opportunity to speak and contribute, before the WEEE consultation ends on the 7th March 2024.

I was pleased to see 90 of our customers, suppliers and friends joining our first webinar of the year on the 23rd January. Whether your interest is producer compliance, the distributor take-back scheme, the deposit return scheme or simply keeping up with new technologies in recycling, recovery and reuse, it is good to keep up with developments and share concerns and ideas. I hope you can join us on one of our forthcoming events detailed in this newsletter.

A piece I would like to highlight in this edition of The Sustainable Insider is from our Sales Director Matt Stoneman, who has raised the issue of the UK's dependence on shipping our waste to our neighbours in Europe and further afield. This is sadly the result of decades of low investment, overbearing bureaucracy and a lack of government support. The policy has been to subsidise companies to import logs (often whole trees) from Canada and America to burn to produce expensive electricity, while at the same time relying on other countries to profit from our waste. UK Plc loses both ways. This needs to change. Wastecare is committed to invest solely in UK WM infrastructure. Only by doing so can we ensure our customers will benefit from a reliable, sustainable low-cost recycling solutions.

I hope you enjoy this edition of The Sustainable Insider, and we look forward to working with our existing and new customers alike in the year ahead.

Peter



Join us on Jumbo's Great Yorkshire Tour!

Our battery elephant Jumbo will be taking to the streets of some of Yorkshire's well-loved shopping centres!

The campaign will be in collaboration with our nationwide battery takeback scheme **Battrecycle**, to raise awareness on responsible battery recycling with the general public. Hosted across the Easter holidays, we'll be educating the next generation of recyclers on the importance of not throwing away your batteries, and what happens when they're recycled!

If you're a Yorkshire-based business who would like to get involved with Jumbo's Yorkshire tour, please get in touch at hello@battrecycle.org.



"We believe that by bringing Jumbo the Battery Elephant to London's bustling shopping centres, we can make a meaningful impact in raising awareness about the importance of battery recycling. Together with ELWA, we are committed to creating a cleaner, more sustainable future for London."



Matt Stoneman Wastecare Sales Director



ELWA and Wastecare host Jumbo in Boroughs' Shopping Centres

The East London Waste Authority (ELWA) partnered with Wastecare Group to host their battery recycling campaign across four London Boroughs during 2023 Recycling Week.

During Recycling Week last October, we teamed up with the East London Waste Authority (ELWA) to spread awareness among the general public on the importance of battery recycling. Jumbo was keen to join the campaign, drawing a lot of attention outside Romford's Liberty Shopping Centre, the Stratford Shopping Centre, the Exchange Ilford, and Dagenham Library.

Mariam Bajulaiye, the Waste Prevention Manager at the ELWA highlighted the importance of this partnership across the four Constituent Councils: "This campaign will support residents to understand the necessary steps required to appropriately recycle batteries and



disposable vapes at their local reuse and recycling centres."

Overall, the team calculated that Jumbo attracted over 20,000 interactions over the four days - that's a lot of selfies!

This unique collaboration between ELWA and Wastecare demonstrates their shared dedication to environmental responsibility and community education. For more information about ELWA's appropriate battery recycling campaign, please visit their website or contact Mariam Bajulaiye at enquiries@ eastlondonwaste.gov.uk.

Spotlight on the Wastecare **East Kent High-Temperature Incinerator**

Built by Pfizer Pharmaceutical, Wastecare acquired the High-Temperature Incinerator (HTI) in East Kent in 2019, and it has become a fundamental part of Wastecare's service offering. Fully-permitted to incinerate the most hazardous of waste streams, the site is mainly used

to completely destroy waste that cannot be sustainably recycled or recovered.

The heat and energy produced during the incineration process is harnessed to ensure this waste disposal process falls into the recovery category of the waste hierarchy. The complexity of this process requires members of the 26-strong team there on a 24/7 shift rotation to maintain, monitor, and make the incremental adjustments key to keeping the incinerator running optimally.

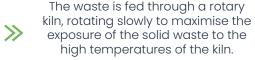
HOW IT WORKS

The processing temperature of the incinerator is generally 950 - 1050°C, maintained via feeding it solvents from our tank farm to increase the temperature, or an aqueous stream to lower it.

Any of the waste materials that

for further treatment.

Our on-site chemists ensure every waste load has the correct balance of materials and chemical types. This ensures the kiln's temperature doesn't spike unexpectedly, and to maintain the site's oxygen and CO levels within EA regulations.





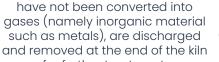
The high temperatures within the kiln converts highly hazardous liquids, sludges and combustible solids into a gaseous steam.



Any fumes expelled are cleansed via an air pollution control system, before being discharged under a continuous monitoring regime controlled by

the Environment Agency.

The heat from the process is recovered to generate electricity currently providing the site with 80% of





the energy it requires to run.





Did you know?

We can incinerate:

- Controlled drugs
- Clinical waste
- Flammable waste
- Explosives and oxidising waste
- Infectious waste
- ...to name a few!

Main Benefits of High-Temperature Incineration

Incineration has a number of benefits associated with it, including:

- Energy released from the incineration process is converted into electricity
- It diverts large amounts of waste from landfill, minimising impact on the environment
- It is a hygienic method of incinerating infected clinical waste as vectors and pathogens are destroyed
- Produces less odour than landfills thereby reducing air pollution
- Incinerators reduce the solid mass of the original waste to over 80% and volume by 95%

Wastecare's Industry Services: Q1 Highlights



Remote engineer waste drop-off service

We have recently begun mobilising a waste drop-off service for engineers who work remotely via dedicated collection points.

The service was motivated by a recent EA focus on companies who are failing their ISOs due to a lack of duty of care, with engineers having to take their waste home.

If you run a remote-service business producing difficult or hazardous waste, we can implement a cost-effective and reliable solution tailored to you.



End-of-year stock clearances
As we are nearing the end of
the financial year the enquiries
for fallen stock clearances are
increasing rapidly; particularly
across the distribution,
warehousing, pharmaceutical and

public health sectors.

We can mobilise a collection schedule for high volumes of fallen stock waste within 10 working days.* For new business, contact salesenquiries@wastecare.co.uk, or if you're an existing Wastecare customer call 0800 091 0000.

*Subject to waste type.



Lithium battery collections
Unsurprisingly, we are experiencing a large influx of lithium battery collection enquiries as we head

collection enquiries as we head into the year. The majority of these are from civic amenity sites.

If you require a collection, please contact 0800 091 0000.

Do you need to join a WEEE Producer Compliance Scheme?

If you manufacture or distribute vapes onto the UK market, you may need to register as a EEE producer and enrol with a Producer Compliance Scheme.

As a part of the Wastecare Group, Wastecare Compliance can help vape producers and distributors to meet their obligation via our nationwide collection points.

Contact compliance@wastecare.co.uk or call 0330 331 1801.

Vape Collection and Recycling with Wastecare

As one of the largest collectors of portable batteries nationwide, Wastecare are also offering a vape takeback scheme for vape retailers.

So far, we have implemented over 5,500 vape collection points in the past year. We have two types of vape collection containers available:

5L vape collection bucket



30L vape collection drum



Get in touch with our team for more information on container costs, collection arrangements and fees salesenquiries@wastecare.co.uk or 0800 091 0000.

Vape Collection and Recycling FAQs

Do the vape collection bins need to contain vermiculite?

No. Vermiculite when used to mitigate the risks associated with lithium-based batteries is used as a separation material to prevent ignition upon contact with one another. Upon assessment, the same risks do not apply to vapes as the lithium battery and their terminals are enclosed.

What happens to the vapes once they are collected?

Currently, many vape recyclers are having to dismantle vapes by hand. This process is resource-heavy and expensive, therefore we are currently trialling a mechanised dismantling process for vapes into order to keep our costs low and increase efficiency.





If you're a vape producer, importer, distributor or retailer - our collection and our compliance team are on hand to provide expert advice and solutions.



Contact them on 0800 091 0000 or email recycling@wastecare.co.uk

to increase vape collection and recycling across the

UK. We have teamed up with e-cigarette and vaping group Supreme Plc, and global vape brand ELFBAR,

to roll out vape collection bins across all B&M stores

Wastecare Partner with Supreme Plc to Roll Out Vape Recycling Bins **Across All B&M Stores**

The scheme Supreme describes as the "first of its kind to appear in the entire state of a nationwide retail chain", in the hope it will "significantly increase" the expansion of nationwide vape recycling.

With more than 700 in-store vape recycling bins due to be rolled out in the coming months, Wastecare will be managing the collection and recycling process. We are currently trialling mechanical methods to dismantle vapes, with the collected devices to be recovered and recycled in line with existing disposal rules. Vape batteries will then be processed to recover the lithium, as well as the filter and nicotine elements are sent for incineration.

Sandy Chadha, CEO of Supreme, said of the partnership: "As an organisation, we are continually developing long-term recycling solutions across our whole product portfolio, and we are proud to be further driving recycling of used vapes across the breadth of the UK, in nearly 700 retail stores."

across the UK.

He added: "We hope this scheme will play its part to help vape users dispose in a far more sustainable manner. This is just the start of our ongoing plans; we are fully committed to increasing the rates of recycling. I hope one day every vape user disposes of their vape in the right way."



These vape bins will provide a convenient disposal point for B&M's shoppers, whilst Wastecare's nationwide logistics network and treatment facility ensures a sustainable and efficient collection process.

Wastecare's Sales Director Matt Stoneman said of the scheme's rollout:

"We're extremely encouraged by the adoption of vape recycling solutions by nationwide retailers such as B&M. We are proud to have over 5,500 collection points and counting so far, confirming Wastecare as the market leaders for vape recycling in the UK. We know that visible vape disposal points with consistent collections will demonstrate the commitment of vape producers and retailers alike, and will be a key step toward shifting public behaviour."



Wastecare's 2024 UK Exhibition Schedule

This year we're prioritising attending the exhibitions and conferences that our customers and clients value, in order to keep up to date with sector developments and discuss their waste management requirements.

The Wastecare sales team will be touring the UK, so if you're attending any of those listed below - drop by our stand to say hello and discuss your hazardous waste streams.

Southern Manufacturing & Electronics	6 - 8 Feb	Farnborough International Exhibition Centre	
Medical Technology UK	13 - 14 March	Coventry Building Society Arena	
Engineering Supply Chain Show	16 - 18 April	NEC, Birmingham	
ChemUK Exhibition	15-16 May	NEC, Birmingham	

Vape producers: Navigating regulation changes, problematic recycling costs, and the PBS impact

Our Head of Compliance Clément Gaubert, and our Head of Systems
Development Kyle Beachill sit down with Arcus Compliance to discuss what the
PBS will mean for vape producers, why vape recycling has been a problematic
process up to this point, and what course of action we believe producers should
take to navigate the changes.

Rob: Kyle, can you give me a quick run-down of exactly what has changed and why?

Kyle: Vapes are currently classed as category 7 under the EEE producer compliance responsibility, which covers toys and other items which are quite cheap to collect and recycle. What that's led to is a problem whereby a lot of local authorities and mixed recycling facilities have ended up with a lot of vapes that producer compliance schemes can't afford to pick up under the current system. So there exists a 'backstop' called the Producer Compliance Scheme Balancing System (PBS), that allows local authorities to make a request to have waste electricals collected in the situation when their usual contracted collection supplier – usually a compliance scheme – say that they're not prepared to collect it.

Rob: So are there a number of waste collection companies refusing to collect vape products?

Kyle: It's not so much that they're refusing to collect them, but rather that they're seeing very high costs associated with recycling them. So typically vapes are anywhere around £10,000 to £11,000 per tonne to recycle because of the manual processes involved in taking them apart.

In addition, there's quite a high amount of contraband in the vapes, so we're not quite sure what they're made of, in addition to the POPs issues surrounding the plastics that are in them. We've also got lithium batteries that need recycling and alongside incineration – so this whole process means they're extremely expensive to collect and recycle properly, and the current regulations and the category 7 they're in now doesn't cover those costs.

So we're not necessarily seeing schemes refuse to collect them, but what we are seeing are waste companies saying we're quite happy to collect them, but at the actual cost of recycling.

Rob: So what should the vape industry be doing now with regards to this change?

Kyle: I think the important thing is to work as an industry to ask: 'How can we control this situation, and how can we bring this cost down?'; Because what we'll see is that



as things go through the PBS there will be absolutely no control over the cost. They will see a quarterly invoice being issued back to the compliance schemes for these costs of



collection, which will be allocated back to those vape producers who have joined a compliance scheme.

What we're then going to see is that those producers will end up paying for the recycling of all the vapes coming out of these sorts of facilities – whether that's contraband, grey-market imports, or legitimate single-use and reusable vapes.

I think the important thing now is working out how we reduce the overall cost of compliance. And I think its mainly an education piece. So what we're looking for is the vape industry to work as a whole to educate the public about what should they do with single-use vapes and how they go about recycling them.

Rob: Do you think that the responsibility for educating the consumer lies directly with the vape industry, or should it also lie with the local authorities as well?

Kyle: I think fundamentally there is a responsibility on the producers to say 'This is what you do and this is how you responsibly recycle vapes and this is what you should do with them'. And I think part of the problem is we're seeing such a disparate message from different producers, and so many different types of recycling initiatives.

Clément: I think as a producer you want to control your costs and you want to do the right thing. So with vapes, you've got an opportunity to be a leading force in the change because you could either put out containers and as Kyle mentioned control your costs and transportation and do the education piece, or you could wait and you'll have this PBS invoice which is harder to explain and harder to understand.

So what we're saying with vapes, especially because of the cost involved, is that we need support to increase the number of collection points across the UK to be more productive – as with the PBS we're going to have at least 12 months' worth of backlog. So the more the producers do the right thing, and join a scheme, this will spread the cost across more vape producers.



Read and watch the full interview using the QR code, or visit the news section of: **compliance.wastecare.co.uk.**



The Transfrontier Shipment Regulations: Transferring our waste problems onto our neighbours

Opinion piece by Matt Stoneman, Wastecare Group Sales Director



For centuries, Britain has stood as a beacon of innovation and manufacturing prowess. However in the last fifty years, a significant portion of our engineering and manufacturing has been outsourced abroad along with many of our inventions developed overseas. Waste management and recycling has followed the same path. Despite being a critical force in safeguarding our planet, waste management has become yet another sector becoming heavily reliant on other nations for innovation and investment in recycling.

The global movement of waste has reached staggering proportions. Europe alone exports more than 30 million tonnes of waste worldwide a year while importing 16 million tonnes from outside the EU. In addition, a shocking estimate of over 8 million tonnes of additional waste is being illegally shipped worldwide.

In response to this crisis, the EU implemented the Export of Waste Regulations in November 2021 in an attempt to curb waste crime and impose controls on the volume of waste exported. In the UK, the Environment Agency governs the movement of recyclable materials across borders through the Transfrontier Shipment (TFS). Regulations. However presently, over 800,000 tonnes of waste is being legally exported annually from the UK - with plastics constituting over 60% of this trade. In our eyes, this practice of sending materials offshore that could be processed and recycled domestically is completely counter-intuitive.

We all know the UK's trade balance with other nations has been in deficit for over four decades. This imbalance is exacerbated by paying other countries to handle our waste and subsequently paying for products manufactured from the same waste. The irony is clear.

Moreover, aside from transport costs and the environmental impact of increased carbon emissions, outsourcing waste management while continuing consumption perpetuates an economically flawed cycle. And others are catching on. China, India, Turkey, and Vietnam amongst others have started refusing our waste, and The Netherlands have implemented a waste import tax to regulate volumes entering the country. Repercussions of our waste export trade hit the headlines in early 2022, when the Environment Agency incurred a £Imillion bill from Indonesia to repatriate illegally exported waste—a burden borne by taxpayers whilst leaving the perpetrators unpunished.

The need for change is glaringly evident in the pursuit of global net zero waste disposal. It's time to challenge these practices and the status quo. Why can't we process this material domestically when we have the capacity to do so?

Countries like Germany, Switzerland, and Sweden serve as key examples of having invested in sustainable, efficient, and clean waste recovery methods internally. Sweden's model means that it recycles nearly half of what is thrown away, and the majority of the rest is utilised in waste-to-energy processes – leaving less than one percent reaching landfill. This continued investment in recycling practices to reach the EU's recycling target of 65% by 2035 remains at the forefront of Sweden's strategies.

Our call is for the UK government and regulators to champion recyclers and re-processors, whilst encouraging investment in cutting-edge technology to position the UK as a leader in waste management.

However we do want to stress that advocating for self-sufficiency in waste management doesn't oppose free trade. While importing products can be economically justified, the scenario becomes more intricate concerning waste. Refuse Derived Fuels and Solid Recovered Fuels for instance, are often transported to Sweden and Germany for recovery, incurring additional costs for transportation, treatment, and resulting in higher-priced electricity and products.

Ultimately, it's now more imperative than ever for the UK to leverage its domestic infrastructure to attract investments that elevate our waste management standards and reduce costs for all. While benefiting from a global economy, we must strive for self-sufficiency and carbon reduction in avoidable circumstances.

Producer Compliance Calendar

» Wastecare Webinars

Tuesday 13th February at 10am: WEEE Regulations webinar **Secure your place here**

Tuesday 27th February at 10am: WEEE Takeback webinar **Secure your place here**

» Packaging members

31st January: January - June 2023 data submission due under the new EPR Packaging Waste Regulations 2022

1st March: Annual 2023 packaging data submission due under the Packaging Waste Regulations 2007

1st April: July - December 2023 data submission due under the new EPR Packaging Waste Regulations 2022

Contact email packaging.compliance@wastecare.co.uk

» WEEE members

7th March: DEFRA WEEE Regulations Consultation Closes

15th April: 2024 Q1 EEE data submission due

Contact email: compliance@wastecare.co.uk

» Battery members

PEPEREFE

31st January: Q4 2023 portable battery data submission due

February: 2023 Data Reconciliation invoiced

1st March: 2023 industrial & automotive data due

30th April: Q1 2024 portable battery data submission due

Contact email: complianceservices@wastecare.co.uk





Government Publishes Long Awaited WEEE Regulations Reform

The Government has <u>published the long-awaited consultation</u> on the reform of the WEEE compliance regulations.

Proposed changes are intended to increase the options and convenience for householders and businesses to use appropriate reuse, recycling and disposal routes. These measures include:

- » Collection of WEEE directly from households, financed by EEE producers
- » Large retailers to offer free in store takeback without the need to buy a replacement electrical product
- » Retailers and online sellers to collect unwanted or broken large electrical items for free when delivering a replacement

- » Online marketplaces to contribute to the collection of WEEE and financing their preparation for reuse and recycling
- » Introduction of a separate EEE category for vapes to ensure vape producers properly finance the cost of their separate collection and treatment

The majority of these measures are intended to come into place from 2026. However, we expect the Government are looking to implement a few key changes in the coming weeks regarding online marketplaces and vape producer compliance.

"We welcome the publication of the long-awaited consultation on the reform of the WEEE Regulations and we look forward to sharing our views. We believe the Government proposals will address the flaws of the existing system and make it more convenient for householders and businesses to dispose of their WEEE responsibly.

We believe these measures will help to divert more WEEE from landfill and keep precious metals in the circular economy. It will also ensure all producers, including online marketplaces and vape producers properly finance the disposal cost of WEEE."



Clément Gaubert Head of Wastecare Compliance

The consultation will run until the 7th March. We will be hosting webinars at 10am on the 13th and 27th of February to review these proposals and discuss how Wastecare can help you prepare for these changes.

We Can Offset Your Producer Obligation to Reduce Your Compliance Costs

As a leading waste collector and recycler, we can offset your producer compliance costs by collecting household WEEE and waste portable batteries that you may be responsible for, either at your premises as well as your customers'.

For WEEE compliance we will offset your producer obligation cost by the EEE categories you are obligated for on a likefor-like basis. So, if we collect household WEEE that is in the same category as the household EEE you place on the market, we will offset your producer obligation and reduce your WEEE compliance cost.

Similarly for Battery compliance, we will offset your producer obligation by the volume of waste portable batteries we will collect on your behalf and reduce your battery compliance cost.

Please contact our producer compliance team at **compliance@** wastecare.co.uk or call 0330 331 1801 to discuss.



Wastecare Compliance Secure PERNs/PRNs Below Market Rates

We're pleased to announce that we have finished buying the volume of PRNs we needed to ensure our packaging compliance scheme (Packcare) complies successfully for 2023. In addition, we have secured our annual PRNs below market rates across all packaging materials.

Last month we invoiced the last of the three PRN fees instalments. The prices of our third instalment reflected the reduction in PRN cost that we have observed in recent months.

We have once again witnessed a familiar feature of the PRN market - the influence of the UK packaging waste recycling data. The publication of this data, reported by recyclers and re-processors quarterly, can sometimes trigger sharp movements in PRN prices.

In particular, the price of plastic PRN dropped abruptly in October following the publication of the Q3 packaging waste data - reaching its lowest value for the year in recent weeks.

However, the plastic PRN average price for 2023 remains higher than 2022 (as of the publication of this newsletter). The price of paper PRNs also fell following the quarterly data in Q2, and this downward trend continued until October.

We are anticipating a healthy volume of carryover PRNs*, which means the low price recorded in Q4 across most materials may continue into the new year.

Contact packaging.compliance@wastecare.co.uk for more information.

*PERNs/PRNs issued on packaging waste received or exported in December in any year can be used for evidence of compliance in that year or the following year.



UK Government Confirms 2024 Packaging Waste Recycling Targets

The government has recently confirmed the packaging waste recycling targets for 2024. Wood is the only material with a year-on-year increase (35% to 42%).

The target for general recycling has also been raised from 77% to 80%. These targets will be applied to the volume of packaging you handled in 2023 to calculate your 2024 obligation under the Packaging Waste Regulations 2007.

You need to report your packaging data to the scheme by the 1st March 2024 under the Packaging Regulations 2007.

In addition to the targets listed, we also observed:

- » The percentage of glass to be recycled by re-melt will increase to 75%
- » Allocation method tonnage will remain at 35t

Packaging Material	2023 Targets	2024 Targets
Paper	83%	83%
Glass	82%	82%
Aluminium	69%	69%
Steel	87%	87%
Plastic	61%	61%
Wood	35%	42%
Overall recycling target	77%	80%



Join our Wastecare Producer Compliance Webinars

The Wastecare Producer Compliance team have begun hosting their first series of webinars - secure your place in your chosen webinar below.

WEEE Regulations Webinar

Tuesday 13th February | 10.00am Topics due to be covered:

- » Household WEEE collection
- » Distributors takeback obligation
- » New producer obligations for online marketolaces
- » Intro of separate EEE category for vanes
- » B2B WEEE collection

To secure your place sign up here.

WEEE Takeback Webinar

Tuesday 27th February | 10.00am Topics due to be covered:

- » WEEE and battery collection services
- » WEEE and battery repair and recycling operations
- » Offset your producer cost with take back
- » Our secure asset disposal services
- » Wastecare vapes collection services

To secure your place sign up here.

An Interview with envenance: Wastecare's Partner for EU Producer Compliance

Our Head of Wastecare Compliance Clément Gaubert sits down with Helmut Minor - Managing Director of our EU Producer Compliance partner envenance.

Hi Helmut, give us a brief background on yourself and envenance.

Helmut: I have been doing producer compliance within the EU for 20 years now, and I started envenance at the beginning of 2022.

One of the main drivers of joining forces with Wastecare was the successful partnership I've already had for many years in my previous role in another company. I imagine the motivation for Wastecare is that you have a trusted company that you can refer your customers to for all of your European compliance requirements for WEEE, packaging and batteries.

What are the benefits to businesses in utilising this compliance partnership?

Helmut: The most distinct advantage is that companies will only have two contracts with experts in the field: one with Wastecare for the UK and one for the whole of the EU with envenance. envenance is the one point of contact to enable companies to ensure compliance within each individual EU country they place WEEE, batteries or packaging onto the market.

Clément: What we often see is customers asking us for our opinion on their producer compliance needs abroad. For example they will mention they export to Germany or Spain, and we can then pass them on to Helmut to provide expert advice on each domestic EU market.

The most frequent question we get is 'what defines a producer in a certain market?'. This is where evenance come in to discuss what market it is, and whether the company is obligated as a producer.

What do these conversations tend to revolve around?

Helmut: My first response is to always ask: do you sell directly from the UK to end users?

In those cases, the so-called 'distance sellers' have to fulfil producer obligations in that specific country abroad. If a UK-based company only sells to

distributors, we need to look into the specific setup. Particularly for packaging, the obligations are differentiated across the countries, e.g. in Germany.

Have you seen any change, particularly in the past couple of years, as to how UK businesses are approaching compliance within the EU?

Helmut: I think that what we are seeing is a variety of changes in legislations which represent challenges for UK companies, both in terms of knowledge of those regulations and then how to comply with them.

Currently, we are facing the implementation of the new Batteries Regulation which is in force and will have its first deadline for implementation in February 2024. In parallel we see that the EU Parliament has agreed to move forward with the dialogue upon the proposal for a Packing Regulation to replace the current Packaging Directive.

Furthermore, we have the effects of the amended Waste Framework Directive. This was one of the reasons Denmark implemented a Packaging EPR (Extended Producer Responsibility), requiring packaging scheme participation and registrations from next year onwards.

All of these developments trigger clients to ask more about their obligation in Europe which is when we step in to provide advice and explain the impact on a product life cycle – and implement the necessary means for those companies.

Does the EU have any impact on UK regulations? Or vice versa?

Clément: One of the things the EU does influence is the targets for battery recycling. The EU has raised their targets from 45% for this year to 63% by 2027 for portable battery collections. This is a huge jump, and it's likely the UK will monitor what's being done in the EU and assess if they can align with this target.

Helmut: As I see it, the introduction of the Packaging EPR into the UK will likely mean they will apply similar logic to





Helmut Minor, envenance MD

the EU when executing packaging EPR compliance.

What is the main priority for UK business when it comes to their European producer compliance needs - registration, domestic market data reporting, or WEEE returns?

Helmut: In my opinion, the main focus is clearly on what I call 'compliance administration'.

Compliance administration includes registration, reporting of the placed on the market volumes, payment of invoices and data management. All this requires both the capability and capacity to manage data – and we respond to this requirement. This is why we like to view ourselves here at envenance as a digital service provider for our client.

This administration ultimately provides the customer with a producer registration number, which is often key to accessing many markets here in the EU. For instance, you cannot sell on Amazon or to public authorities without a producer registration number.

There is a huge emphasis in the EU on managing the administration to become and remain compliant – both within the authorities and on the producer side. As I see it, this will continue to be the case. Ultimately, all those efforts are part of the European Green Deal and the timeline for the fulfilment of the first sets of targets in 2030 is not that far away anymore.

To discuss what your obligations may be in the EU, please get in touch with your account manager or contact the team on 0330 331 1801.

SUSTAINABLE INSIDER

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For more information or for media enquiries, please contact marketing@wastecare.co.uk



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