



Living with WEEE

With the deadline for compliance to WEEE recently extended, just how prepared to meet the legislation is the UK? New Electronics' experts lend their views on the UK's state of play. By **Vanessa Knivett**.

If one point alone demonstrates the inadequacy of man made processes, it is this – no industrial process yet demonstrated has been able to mimic the efficiency with which the natural world recycles matter. With the electronics industry no exception, our constant pursuit of performance, speed, accuracy and reduced cost in the name of Moore's Law, means that we tend to forget more fundamental 'Laws' that value 'end of life'.

As much as any piece of European legislation can do, the Waste Electrical and Electronic Equipment (WEEE) Directive aims to address this balance. Designed to encourage designers and producers of electrical and electronic equipment to take into account repair, upgrade, disassembly, reuse and recycling as vital stages within a product's lifecycle, WEEE has, so far, experienced a troubled path to take up.

On a physical level, the task is a signif-

icant one. An estimated six million tonnes of electrical equipment is discarded annually throughout Europe, comprising 2.4million tonnes of ferrous metal, 1.2million tonnes of plastic, 650,000tonnes of copper, more than 300,000tonnes of aluminium and of glass, and quantities of harmful substances such as lead, mercury and flame retardants.

In administration terms, each Government must: outline the scope of WEEE; clarify the role of the 'producer'; define a registration process; set up collection and treatment schemes; monitor and enforce the process, and coordinate these efforts with those of other countries.

Recognising the scale of the task ahead, the UK government has recently extended the deadline for compliance to WEEE from August 2005 to January 2006. In doing so, like other member states such as France and Germany, the

UK has missed the original transposition deadline of 13th August 2004.

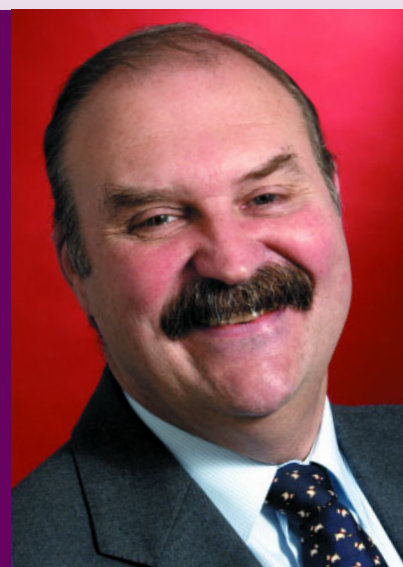
John Higgins, director general of industry campaigner Intellect, offered his views on the UK's current state of play: "From August 2005 electronics manufacturers will [begin to] take financial responsibility for the cost of WEEE waste disposal. However, to allow industry to hit this deadline the Government needed to introduce legislation in the UK in August 2004. Government failed to do this and industry is still uncertain about the shape the UK law will take. Industry is seriously concerned that in order to now meet this deadline, the Government will hurry through a badly thought through law. It is imperative that this does not happen."

Dr Stuart Ballinger of Envirowise, the independent advice resource for the electronics industry, has a different perspective on the revised timetable: "The UK gov-



John Higgins, left: "Industry is still uncertain about the shape that the UK law will take."

Vic Clements, right: "The biggest immediate challenge is keeping up to date with the implementation of the directive in the individual member states."





ernment is taking the correct approach to implementing the WEEE and RoHS directives. It is attempting to get it right first time as opposed to rushing through legislation to meet the deadline, causing industry and government all sorts of problems. For RoHS, the UK government aims to have the directive transposed in the near future – it is awaiting concentration level confirmation from Europe. The directive will be implemented from July 2006.”

Referring to the missed deadline, Vic Clements, head of sales and marketing at consultancy RFI, comments: “The main issue appears to be the instituting of the National Clearing House (NCH) as a means of providing for registration and the allocation and scheduling of producer obligated WEEE. Two proposals are now before the minister for decision. Until this is decided, the regulations cannot be finalised. It will probably be June or July at the earliest for the regulations to come into effect, leaving little time for producers to go through the processes of registration and of setting up their preferred compliance approach.”

Another hurdle is in the area of individual producer responsibility (IPR). “At least for the foreseeable future, IPR will not be possible in the UK, as a collective market share system of calculating obligation will apply to both historic and new waste. Producers can elect to operate ‘independently’, but they will still be allocated a share of WEEE to manage and finance, against which they can offset independently treated WEEE,” says Clements.

Intellect is supporting a collective system. Explains Higgins: “We must have a NCH scheme – there is no alternative. This will offer the most effective way for manufacturers to spread the financial load and ensure that the least possible cost is passed on to the consumer.”

A further concern is the recycling infrastructure. Ballinger relates that in the UK, 4kg of household WEEE per head of population are already collected through white goods, leading him to add that ‘the targets are therefore achievable.’ Clements acknowledges this but argues: “With the exception of ITE, the recycling of the other WEEE categories is insignificant

and will present the recycling industry with a whole raft of technical problems and costs, in order to meet the WEEE treatment and licensing requirements.”

What lies ahead?

With a National Clearance House scheme still in the embryonic stages, and concern that the recycling infrastructure is not yet sufficiently developed enough, it seems that few are likely to disagree with Higgins’ statement – that the WEEE directive still ‘poses major practical challenges.’ However, as Tony Inskip director of UK contract manufacturer Zirkon comments: “These two pieces of regulation (WEEE and RoHS) are not going to go away. Whether they are delayed or not, they will happen and the best stance is to be as prepared as possible for them.”

Notes Clements: “The biggest immediate challenge is keeping up to date with the implementation of the directive in the individual Member States, as each set of rules and regulations are put into force.



Tony Inskip, above: “These two pieces of regulation (WEEE and RoHS) are not going to go away. Whether they are delayed or not, they will happen and the best stance is to be as prepared as possible for them.”

Until they are published, producers can’t know for sure how to register and what compliance schemes or regimes apply. This is further complicated by the fact that the regulations will be published in the language of the Member State and will require accurate translation for UK manufacturers. For a manufacturer who is a ‘producer’ in all 25 Member States, this is a major logistical task.”

On a practical level, Dr Ballinger suggests that near term challenges companies face include: “Finding out what is in their products, becoming RoHS compliant (including going lead free), making sure all products that are to be sold after August have the correct markings, calculating EEE put onto market between January and December 2004 for registration purposes, and considering options for compliance – i.e. design, compliance scheme, individual compliance etc.” Meanwhile, he suggests that in the near term, government needs to resolve issues like ‘the registration process, enforcement, how compliance requirements are calculated, retailer take back and the issue with reuse.’

Zirkon’s Inskip comments: “Thanks to our own and others efforts, the vast majority of our customers are now aware of their responsibility for WEEE and RoHS but need more definitive information on how to comply. As for our own state of preparation, we are doing the necessary fact finding and are now 100% lead free process compliant. By being prepared for the legislation, we will be in a position to use it to bring new customers on board.”

What all our experts acknowledge is that the full impact of WEEE on the UK electronics market is yet to come. Concludes Clements: “We are at a very early stage. The major impact will come when producers have to start choosing and managing the route to compliance in each Member State. This will involve identifying and contracting with compliance schemes or directly with service providers and then ensuring that the registration, compliance reporting and certification is carried out correctly. In particular, the major cost impacts, which will hit when collection, treatment and recycling starts and producers start paying.”