WEEE reform Call for Evidence:
Template answers, February 2024
Deadline: 7th March

Introduction

Who this is for: Repair cafes/ community groups engaged in repair and reuse

What is the WEEE reform consultation and call for evidence? In December 2023, the UK government issued a long awaited proposal for reforming our WEEE (Waste electrical and electronic equipment) regulations, after exiting the EU. It comes in two parts:

- **Consultation**: Proposed reforms to how we recycle electricals. This includes mandating retailers to take back old electricals, and doorstep electronic waste collections, but does little to keep electricals in use for longer. There is a set of 74 consultation questions to gather feedback on their proposals.
- **Call for Evidence:** This is much more interesting to those of us that want to see more repair and reuse. It has 71 questions asking for evidence to support more substantial reforms, like:
    - Introducing reuse targets.
    - Providing information about repairability and durability at point of sale.
    - Banning the destruction of unsold goods.

What is this document for? Most people do not have time to wade through 145 technical questions, so ***we've picked out the more interesting questions***, added 'translations' in boxes to help you understand the technical jargon, and we've suggested some answers.

You can respond by answering one question, or all of them. Just pick the questions you want to respond to, add in any evidence you have, and, if you like, copy our template answer - but ***don't forget to add your own edits for impact***. Suggested additions in **pink**.

How to respond (*please let us know at policy@therestartproject.org if you do respond***):**

- You can fill in the online form, and skip to the questions you want to answer
- Or you can e-mail weee@defra.gov.uk, responding to only the questions you have responses for (plus the first few about who you are).

How long will this take? Depending on how much evidence you add, 20-60 mins

Things to note:

- Numbers matter: DEFRA will look at how many responses they get from each sector, so even if you only answer one question (plus who you are), it's worth it.
- The questions are likely to be divided between team members to analyse, so treat each answer independently and you can use the same facts in multiple questions.
- *Identical answers are considered one response, so **please edit template answers.***

WEEE reform Call for Evidence:
Template answers, February 2024
Deadline: 7th March

Template Responses
(please copy to new document before editing)

[If e-mailing] Dear DEFRA team, (weee@defra.gov.uk)

Please find below my responses to the WEEE call for evidence, focusing on the questions that are relevant to my experience.

1. What is your name? [add your name]

2. What is your email address? [add e-mail address]

3. Which of the following best describes you?

- **[Add name of the organisation you represent]**
- **[An approximate size/number of staff/ volunteers]**
- [**Pick *ONE* type of organisation and delete the others: community group/ non-governmental organisation/ charity or social enterprise/ re-use or repair operator/ individual - see the online survey for other options if needed**]

4. Would you like your response to be confidential? Answer Yes or No. If you answered 'Yes', please briefly explain why you require your response to be confidential.

—

21. Do you agree or disagree that giving a higher weighting to tonnage collected by PCSs for re-use (or preparation for re-use) towards their collection targets, than tonnage collected for recycling would incentivise greater re-use (or preparation for reuse) of WEEE? Please select one of the following options: *Agree*

> ***Translation:*** ***This would mean that the companies that collect waste will be incentivised to separate out waste for reuse rather than send it all to recycling. They'll get more 'points' for waste that's reused.***

22. Please provide any evidence you have to support your answer to question 21.
[Insert any data or experience from trying to reuse products from a waste facility]

Evidence of current waste of reusable products
In a recent study of the small appliances taken to a West London Household Reuse and Recycling Centre (HRRC), the Restart Project and West London Waste Authority found that 36% of all small electricals headed for recycling were still in good working condition. An

additional 10% of items assessed only needed simple, low cost repairs to be restored to good working condition. Shockingly, this means that almost half of the electrical products sent for recycling during the study could have remained in use if diverted from the recycling stream through reuse and repair. Restart estimates that across the UK this could mean that over 30,000 usable electrical products are being recycled *every week*. These products could have been used by someone in need, sold or repaired to extend the lifespan of the product. These figures are consistent with previous research, e.g. a 2017 report

Having tested these products, The Restart Project had to throw the 274 working items back into landfill because, having entered the waste facility, they had been classed as waste.

23. Do you agree or disagree that we should introduce new targets for the re-use (or preparation for re-use) of WEEE that has been collected separately from other types of waste to incentivise more collections for re-use (or preparation for re-use)? Please select one of the following options: *Agree*

> ***Translation:*** ***Currently, processing of waste electricals is funded by manufacturers. But this only applies once products enter the 'waste stream', i.e. once they enter a waste facility. After products enter these facilities they are classed as 'waste' and therefore cannot legally be diverted for reuse, even if they're new and in the box.***
>
> ***As a result, reuse efforts must be made before electricals enter these facilities and are classed as waste. But then, this means anything that is done to avoid waste before it enters the waste stream is not counted or supported by the funding by manufacturers in the waste system.***
>
> ***Introducing targets for reuse outside waste collection would address this.***

24. Please provide any evidence you have to support your answer to question 23.

Evidence from community-led waste avoidance
[***Please edit as appropriate - don't worry if you don't have all of these figures***]

At [***name of your repair group***], [In 2023/ since the repair cafe started], **[*insert number*]** repairs were attempted at [insert number] of repair sessions. This volunteer-run work avoided **[*insert number*]** kg of waste and **[*insert number*]** kg CO2 equivalent emissions. In addition to environmental impact, this work played a valuable community cohesion role [***Add numbers of people supported and/ or examples of the community benefits***] Source: [if relevant, link to any report or the platform you use to calculate impact].

Data from community reuse activities [delete if not relevant]
[Add any data you have from reuse activities, e.g. refurbishing laptops for donation to people in need during the pandemic]

However, despite their environmental and social benefits, repair cafes and community-run projects often struggle to receive support or funding from producer compliance schemes. This lack of support primarily stems from the absence of reuse targets within these schemes. Since these initiatives operate outside of traditional waste facilities and focus on repair and refurbishment rather than recycling, they do not align neatly with the objectives and metrics of producer compliance schemes.

Without specific targets for reusing electronic equipment, producer compliance schemes overlook the valuable contribution of repair cafes and community-run repair and reuse projects. These initiatives often rely on volunteers and limited resources to operate, making it challenging for them to sustainably continue without adequate support and funding.

27. Do you agree or disagree that an obligation on PCSs to provide free collection services to re-use charities and the charity retail sector for donated equipment subsequently deemed unsuitable for re-use would promote greater re-use by removing a significant cost barrier to the sector? Please select one of the following options: *Agree*

> ***Translation:*** ***If charities end up with electrical waste that they can't repair, donate or sell for reuse, should waste companies provide a free pick up service (most will have to pay for collection)?***

28. Please provide any evidence you have to support your answer to question 27.
[***Comment if you have any relevant experience finding it difficult to recycle end of life electricals***]

31. Please provide evidence (including from international sources) of other potential mechanisms to increase levels of re-use and preparation for reuse activities across a broad range of products.

> ***Translation:*** ***This is an opportunity to include other policies (like the ones in the Repair and Reuse Declaration), backed up by evidence and experience from your repair activity.***

Mechanism 1. Make repair more affordable, through tax reductions and repair vouchers.

[***If relevant, add comments that highlight how cost is a barrier to repair - perhaps visitors to your repair cafe have said they can't afford to pay for repair, or you know of local businesses that are closing as people aren't prepared to pay the true cost of commercial repair***]

Cost is one of the main things stopping the public from seeking repair when something breaks. In a recent You Gov poll commissioned by Restart, the top reason for those that didn't repair their most recent broken electrical product was that "repair is too expensive". Research by the French Environment Agency (ADEME) shows that people are unlikely to choose repair

of a product if the price of a repair is more than 30% of the price of the same product new. Often this is perceived cost, comparing unfavourably to the price of new, low quality products.

- ***Repair Voucher schemes*** have been set up in Austria, France, and two German regions. Since initiation in April 2022, over 840,000 vouchers have been issued. The Austrian scheme effectively subsidises the cost of professional repairs by offering consumers a rebate of 50% of the price of a repair, up to €200 per year. An Upper Austrian trial found that 40% of the beneficiaries wouldn't have chosen repair without the voucher scheme.

  Evaluation of the Austrian repair bonus scheme after year 1 suggested it was responsible for repair of more devices - both higher cost repairs, and on cheaper products, and repair businesses reported revenue increases ranging from 20% to 100%.

- ***Cutting VAT on repairs.*** A recent study by Green Alliance showed 54% of people surveyed in the UK support green VAT measures like this. Only 12% oppose. And it could contribute to creating 34,000 jobs in the repair economy.

Mechanism 2. Expand the UK's right to repair regulations to cover all consumer products, strengthen design standards and remove barriers to repair for everyone:

[*If relevant, add comments here that highlight how right to repair measures would help you to repair more electricals, thus avoiding electrical waste, including how:*

- ***Expensive or unavailable spare parts have made repair impossible or difficult and led to electricals being discarded***
- ***Lack of access to product manuals has prevented you from being able to repair (or even open up) electricals, resulting in them being discarded.***
- ***Software support running out has meant that visitors have to discard - or you haven't been able to donate - smartphones/ tablets or laptops that are otherwise functional.]***

The EU has recently expanded its ecodesign regulations to cover smartphones and tablets. This mandates that from June 2025 manufacturers will have to make software and security updates available for new models for at least 5 years after removing a product from the market, as well as making spare parts and repair information available for at least 7 years. This will save an estimated ***4 million tons CO2e by 2030*.**

Right to Repair legislation has now passed in 6 US states including California and New York, with active bills in 10 more since the start of 2024, including Alaska, Indiana, Missouri and Washington. The right to repair laws cover a range of products from smartphones to farm equipment and offer consumers access to the spare parts, tools and repair information, as well as extended software support to enable repair for minimum periods.

After a USA campaign in 2023, Google extended its support for Chromebooks, widely used in schools, to 10 years for all models released since 2021. ***Doubling the life of Chromebooks could cut carbon pollution equivalent to taking 900,000 cars off the road for a year,*** according to US PIRG. It could also result in $1.8 billion in savings for US schools. It shows that it is possible for software companies to provide support for an extended period when needed.

WEEE reform Call for Evidence: Template answers, February 2024

Deadline: 7th March

39. Do you agree or disagree that eco-modulation should be supported by mandatory labelling to give consumers visibility of the extent to which the product has met certain eco-design criteria? Please select one of the following options: *Agree*

> ***Translation:*** ***This means that information on repairability and durability of products is displayed at point of sale (a repair index does this). Evidence from France's repair index shows that when presented with this information, consumers choose more repairable products. This then pushes manufacturers to produce more repairable products.***

40. Please provide any evidence you have to support your answer to question 39.

[***If relevant, comment on how your experience shows better information about repairability of products would be beneficial, e.g. do repair cafe 'bringers' talk about how they'd have bought more repairable products had they had more information***].

A repair index has been in place in France since 2021. For this, manufacturers self-assess the repairability of their products based on agreed criteria. This is then shown as a single score from 0-10, displayed prominently alongside the price.

Analysis of the French repair index after the first year showed that:

- 55% of people were aware of the index
- 76% of those aware, said it was useful for their purchase
- Consumers tended to prefer products with a higher repairability score.

41. If you answered 'agree' to the question 39, in which format do you think this information should be displayed? Please select one of the following options:
QR Code (or other electronic tag)/ *Physical label*/ Alternative format

54. Do you agree or disagree that there should be a ban on producers and distributors sending whole items of electrical equipment (such as surplus stock) to landfill or incineration? Please select one of the following options: *Agree*

> ***Translation:*** ***There are currently no restrictions on businesses sending unused products to landfill, incineration or recycling. Needless to say this is extremely wasteful and these products should be brought back into circulation through donations or sale.***

55. Please provide any evidence you have to support your answer to question 54.
[*Please add data or comments on how these products could be diverted for reuse, e.g. if you donate any items to people on low incomes/ in social housing, include that here as evidence of the need*]