

# National Association of Waste Disposal Officers

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Response to dti consultation on UK implementation of WEEE Directive.

NAWDO welcomes the opportunity to comment on the paper setting out the conclusions of the review. NAWDO's members have been concerned for some time that the pace of progress has been slow and insufficient information has been available to enable authorities to understand how the scheme would work and therefore the cost implications for individual authorities. In the meantime many authorities have had to implement schemes and this has led to budgetary and staff pressures and has led to uncertainty in understanding what a collection network would look like and its performance.

There are two key issues.

## 1. Costs.

Quite clearly the responsibility lies with producers and retailers and it is accepted that CA sites will form the backbone of a network of DCFs. There should be no additional costs falling to local authorities from the introduction of the scheme however it is clear that authorities will incur additional costs and there is no clear route for these costs to be recovered. Of particular concern is the cost of site licence changes and infrastructure improvements that may be needed following licence applications. Whilst the EA indicate that no improvements will be required, there is concern that improved drainage requirements may be needed that simply cannot be introduced particularly in rural areas. For the network to consist of the majority of sites, it should be the responsibility of retailers to pay for any improvement required by licence changes. Similarly there will be additional operating costs but these will depend on the collection infrastructure which has not been outlined yet. It can be argued that authorities will make savings by not having to dispose of materials or pay for collections but they will also lose income for scrap metals and reused WEEE. As the market matures for WEEE the costs will fall and there will be less of an incentive to nominate sites as DCFs. To enable authorities to sign up as DCFs they need to believe that in the longer term, taking account of cost and service, it will be in their best interests. Inevitably the situation will be different for each authority and NAWDO accepts that it will not be possible to have precise balancing of costs but overall it should be visibly cost neutral. Further work is needed here and it may be appropriate to allocate additional capital costs to retailer responsibility and additional revenue costs to producer responsibility.

Where sites cannot become DCFs then the authority's additional costs in dealing with WEEE need to be covered.

NAWDO agrees that final scheme should be effective and efficient. However the 3 key players of retailers, producers and LAs have conflicting drivers and the current process does not encourage partnerships to reduce overall costs. WEEE must be separated at some point and, depending where this occurs, the costs can fall to different players. Efficiencies can be maximised by looking at the whole costs of the collection and treatment and this is more likely to be achieved by a reduced number of players or a single imposed system.

## 2. Allocation of sites

Many authorities are developing new sites and improving existing sites to cope with the additional materials that need to be segregated to meet WEEE and LATS obligations in particular. From an operational point of view, all of an authorities sites should be included within one producer scheme and there is an argument that the allocation should be for a larger, regional area. Any allocation should take account of planned changes to the number and location of sites. Where sites cannot become DCFs the producer's scheme should include collections of mixed WEEE.

The fall back position of a central exchange in the allocation arrangements is to be welcomed as it gives authorities some certainty.

## 3. Re-use.

NAWDO agrees with the comments regarding re-use. There are environmental and socio-economic benefits from re-use schemes and increasingly there is an income stream for whole useable or easily repaired items. Naturally both producers and LAs would like to retain control of these materials but at present it appears that only local authorities support small local organisations and the right to introduce re-use schemes should stay with local authorities.

NAWDO represents the large majority of local authority officers who are responsible for providing and operating CA sites and, working with other organisations, can provide detailed knowledge of how changes to proposed WEEE schemes will impact on sites and service. NAWDO will continue to help in delivering an effective, efficient collection system to meet WEEE requirements. Please contact me directly for clarification or further information.

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