



# AVA

The Vending &  
Automated Retail  
Association

## Consolidated list of questions – AVA Response

### Full net cost recovery

5. Considering the points for and against set out in the call for evidence, please select which of the following activities producers should finance the cost of:
- d) Residual waste
  - e) Fly-tipped waste
  - f) Littered waste
6. Please provide evidence of the volume (tonnes) of WEEE arising at UK level and/or by nation level in residual waste.
7. Please provide evidence of the volume (tonnes) of WEEE arising the UK level/and or by nation that has been fly-tipped.
8. Please provide evidence of the volume (tonnes) arising at UK level and/or by nation that has been littered.
9. Please provide evidence of the net costs per tonne for collection of WEEE arising in residual waste.
10. Please provide evidence of the net costs per tonne for collection of WEEE that has been fly-tipped.
11. Please provide evidence of the net costs per tonne for collection of WEEE that has been littered.
12. Please provide evidence of the types of WEEE commonly discarded in the residual waste stream.
13. Please provide evidence of the types of WEEE commonly fly-tipped.
14. Please provide evidence of the types of WEEE commonly littered.

### Allocation of costs for the collection and treatment of household WEEE

15. Do you agree or disagree that we should establish a rolling 3-year process for setting the financial obligations of producers to create more certainty in the system? Please select one of the following options:
- a. Agree
  - b. Disagree
  - c. Unsure
16. Please provide evidence of whether or not setting a rolling three-year forecast would provide more certainty in the system and act to encourage increased investment by the treatment sector.
17. Please provide evidence of whether or not a three-year forecast to set financial obligations be supported by a three-year minimum PCS-DCF contract duration in order to encourage increased investment by the treatment sector?

18. What are your views on the idea of establishing an allocation system as an alternative way to set financial obligations on producers and guaranteeing the financing of Local Authority collections?

19. Please provide evidence on the estimated costs and monetised benefits of both establishing and operating such a system.

20. Please provide evidence of any other alternative approaches, not described in Chapter 2, which you think could be suitable for allocating financial obligations on producers.

## **Prevention of waste and increasing re-use of unwanted electrical and electronic equipment**

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 re-use) of WEEE? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

22. Please provide any evidence you have to support your answer to question 21.

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:

- a. Agree
- b. Disagree
- c. Unsure

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

25. If you answered agree to question 23, please provide evidence to indicate on which of the stakeholder groups below targets should be placed to maximise impact? Please select one of the following options:

- a. Producers (via PCSs)
- b. Retailers
- c. Local authorities
- d. Both retailers and Local Authorities
- e. Unsure

26. Please provide any evidence you have to support your answer to question 25.

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:

- a. Agree
- b. Disagree
- c. Unsure

28. Please provide any evidence you have to support your answer to question 27.

29. Do you agree or disagree that access to data from retailers and Local Authorities on how much used equipment is received at these collection facilities for re-use (and consequentially diverted away from entering the WEEE producer responsibility system) would provide significant and useful new insight into volumes of equipment being re-used that is not classified as waste? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

30. Please provide any evidence you may have to support your answer to question 29.

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.

### **Moving to a circular economy through the design of better products and business models**

32. Do you agree or disagree that implementing a system of eco-modulation into the UK's WEEE system could incentivise more sustainable product design? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

33. Please provide any evidence you have to support your answer to question 32.

34. If you agree with question 32, which of the following approaches would you most likely support:

- a. A new system of EPR in which variable fees, based on units placed on the market (POM), are modulated through the implementation of a malus (increased fee) or bonus (reduced fee).
- b. Maintain the current system of setting obligations based on a market share (by weight) approach but with that market share modulated to reward producers whose products have the lowest environmental impact, thereby reducing their compliance costs compared to those producing more harmful products.
- c. Either of the above approaches

35. Which of the following metrics should we use to prioritise products to eco-modulate? Please select one of the following options:

- a. Total weight of the product (in tonnes).
- b. Total volume (in units) sold on the UK market.
- c. Carbon intensity of the product.

36. Which of the following criteria should be used as an effective basis for eco-modulation:

- a. Recycled content
- b. Recyclability
- c. Reparability
- d. Durability
- e. Energy efficiency
- f. Hazardous substances

37. Are there any other criteria, other than those set out in question 36, which you feel would be relevant? Please specify what these could be.

38. How should compliance with eco-modulation criteria be verified in a way that balances cost with the integrity of the system? Please select one of the following options:

- a. Self-declaration
- b. Third party declaration
- c. In advance control or inspection by the authorities
- d. Other (please specify)

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:

- d) Agree
- e) Disagree
- f) Unsure

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

41. If you answered 'agree' to question 39, in which format do you think this information should be displayed?

Please select one of the following options:

- d) QR Code (or other electronic tag)
- e) Physical label
- f) Alternative format (please specify)

42. Do you agree or disagree that products made available on the market using circular economy business models should be excluded from the calculation of collection and treatment obligations placed on producers because they will in any case be responsible for the individual product when it becomes waste? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

43. Please provide any evidence you have to support your answer to question 42.

## Increasing collections of business WEEE

44. Do you agree or disagree that the current business to business (B2B) system (EEE or WEEE that is designed for business, industry or professional use only, rather than household use) is an effective mechanism by which end users can return WEEE to producers for proper treatment? Please select one of the following options:

- a. Agree
- b. Disagree
- c. Unsure

45. Please any evidence you have to support your answer to question 44.

- For Vending & Automated Retail environment the existing system works well and accommodates multiple re—use, refurbishment, re-manufacture and recycling of equipment.
  - Manufacturers and retailers (operators) all comply with existing WEEE legislation and requirements.
  - Many manufacturers & operators are part of existing compliance schemes.

- Equipment is modular, intended for simple repair & maintenance. As well as refurbishment.
- Replacement parts and spares are readily available. With parts availability extending over 10 years in most cases (see EU Ecodesign regulations).
- The financial basis on which vending equipment is placed on site most often means that ownership remains with the Operator. So is automatically collected and brought back for repair or refurbishment.
- Or – the client takes financial responsibility for the equipment for a fixed, say three to five year period. As this period ends the Operator will then re-contract for new equipment – removing the old as part of the contract. This will then be refurbished and re-sited.
- All old parts and components are processed as part of their obligated waste process.
- End of life equipment is broken down for its constituent parts. Invariably leaving just a steel carcass which is collected and re-processed.

46. Do you agree or disagree that we should extend the principle of producer responsibility to the premises of the business end user (and other non-household premises) and introduce a collective producer responsibility system for Business to Business (B2B) WEEE? Please select one of the following options:

- a. Agree
- b. Disagree**
- c. Unsure

47. Please provide any evidence you have to support your answer to question 46.

- For Vending & Automated Retail environment the existing system works well and accommodates multiple re—use, refurbishment, re-manufacture and recycling of equipment.
  - Manufacturers and retailers (operators) all comply with existing WEEE legislation and requirements.
  - Many manufacturers & operators are part of existing compliance schemes.
  - Equipment is modular, intended for simple repair & maintenance. As well as refurbishment.
  - Replacement parts and spares are readily available. With parts availability extending over 10 years in most cases (see EU Ecodesign regulations).
  - The financial basis on which vending equipment is placed on site most often means that ownership remains with the Operator. So is automatically collected and brought back for repair or refurbishment.
  - Or – the client takes financial responsibility for the equipment for a fixed, say three to five year period. As this period ends the Operator will then re-contract for new equipment – removing the old as part of the contract. This will then be refurbished and re-sited.
  - All old parts and components are processed as part of their obligated waste process.
  - End of life equipment is broken down for its constituent parts. Invariably leaving just a steel carcass which is collected and re-processed.
  - There is no need for an additional system/scheme and associated costs and carbon footprint from additional logistics, administration and personnel.

48. Are there circumstances (for example, for certain product types) in which individual producers should be responsible for the cost of collection and treatment of the products they place on the market when they become waste? Please select one of the following options:

- a. Yes
- b. No
- c. Unsure

49. If you answered yes to question 48, please set out what these product types might be.

50. Do you agree that a system in which producers financed the cost of collection from the business end user and adequately supported by appropriate communications would be sufficient to drive increased levels of business WEEE into the system? Please select one of the following options:

- a. Agree
- b. Disagree**
- c. Unsure

51. Please provide any evidence you have to support your answer to question 50.

**As previously demonstrated, for Vending, there is no need for additional costs when there is already an efficient set of mechanisms and commercial imperatives in places to ensure that maximum recycling takes place.**

52. Are there any circumstances in which it might not be appropriate for producers to finance collections from businesses? Please select one of the following options:

- a. Agree**
- b. Disagree
- c. Unsure

53. If you answered yes to question 52, please say circumstances these may be. Please provide any evidence you have to support your answer.

- **For Vending & Automated Retail environment the existing system works well and accommodates multiple re—use, refurbishment, re-manufacture and recycling of equipment.**
  - **Manufacturers and retailers (operators) all comply with existing WEEE legislation and requirements.**
  - **Many manufacturers & operators are part of existing compliance schemes.**
  - **Equipment is modular, intended for simple repair & maintenance. As well as refurbishment.**
  - **Replacement parts and spares are readily available. With parts availability extending over 10 years in most cases (see EU Ecodesign regulations).**
  - **The financial basis on which vending equipment is placed on site most often means that ownership remains with the Operator. So is automatically collected and brought back for repair or refurbishment.**
  - **Or – the client takes financial responsibility for the equipment for a fixed, say three to five year period. As this period ends the Operator will then re-contract for new equipment – removing the old as part of the contract. This will then be refurbished and re-sited.**
  - **All old parts and components are processed as part of their obligated waste process.**
  - **End of life equipment is broken down for its constituent parts. Invariably leaving just a steel carcass which is collected and re-processed.**
  - **There is no need for an additional system/scheme and associated costs and carbon footprint from additional logistics, administration and personnel.**

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:

- a. Agree**
- b. Disagree
- c. Unsure

55. Please provide any evidence you have to support your answer to question 54.

There is no situation in which a vending equipment manufacturer or operator would send 'surplus stock' to landfill. Manufacturers primarily make to order and operators will site (or re-site) surplus equipment with other clients.

Equipment is built on a modular basis – parts & components can be easily changed to prolong the machines lifespan. It is intended for simple repair & maintenance. As well as refurbishment.

Equipment is manufactured to facilitate multiple re—use, refurbishment, re-manufacture and recycling of equipment. There is no built-in obsolescence – they are meant to last.

Replacement parts and spares are readily available. With parts availability extending over 10 years in most cases (see EU Ecodesign regulations).

End of life equipment is broken down for its constituent parts. Invariably leaving just a steel carcass which is collected and re-processed.

Snack and Cold Drinks machines can last from 15-20 years: refurbished or remanufactured every 3.8 years.

Hot Beverage can be refurbished and reused for 9 years or more. Refurbished or remanufactured every 2.6 years (AVA Census / Market Estimates).

56. If a ban were to be implemented, do you foresee any unintended consequences of unwanted electrical stock being redirected to any of the following routes? Please select one of the following options:

- Reselling
- Repair / refurbishment
- Re-use
- Recycling

57. Please provide any evidence you have to support your answer to question 56.

All of the above (question 56). No vending & automated retailing equipment is consigned to landfill. As detailed in previous responses equipment is repaired, refurbished and re-manufactured. Then re-sited as part of a client offer or broken up for parts.

58. What are your views on alternative policies to improve the B2B system? Please provide any evidence you have to support your answer. For Vending & Automated retail there is no need for alternative policies. There are already highly efficient and cost-effective systems in place to ensure recycling and reuse of equipment. There is no need for new, costly and administratively burdensome alternative:

- For Vending & Automated Retail environment the existing system works well and accommodates multiple re—use, refurbishment, re-manufacture and recycling of equipment.
  - Manufacturers and retailers (operators) all comply with existing WEEE legislation and requirements.
  - Many manufacturers & operators are part of existing compliance schemes.
  - Equipment is modular, intended for simple repair & maintenance. As well as refurbishment.
  - Replacement parts and spares are readily available. With parts availability extending over 10 years in most cases (see EU Ecodesign regulations).
  - The financial basis on which vending equipment is placed on site most often means that ownership remains with the Operator. So is automatically collected and brought back for repair or refurbishment.
  - Or – the client takes financial responsibility for the equipment for a fixed, say three to five year period. As this period ends the Operator will then re-contract for new equipment – removing the old as part of the contract. This will then be refurbished and re-sited.
  - All old parts and components are processed as part of their obligated waste process.

- End of life equipment is broken down for its constituent parts. Invariably leaving just a steel carcass which is collected and re-processed. There is no need for an additional system/scheme and associated costs and carbon footprint from additional logistics, administration and personnel.

## Improving treatment standards

59. Do you agree or disagree that the recovery and recycling rates for WEEE should be reviewed to ensure that those targets remain sufficiently challenging whilst achievable? Please select one of the following options:

- \_\_\_\_\_ a. Agree
- \_\_\_\_\_ b. Disagree
- \_\_\_\_\_ c. Unsure

60. Please provide details of evidence sources used to support your answer and evidence on the extent current targets are being met and exceeded.

61. Do you agree or disagree that AATFs should be required to report annually on the extent to which they have met those recycling and recovery targets and that their report should be supported by an independent audit? Please select one of the following options:

- \_\_\_\_\_ a. Agree
- \_\_\_\_\_ b. Disagree
- \_\_\_\_\_ c. Unsure

62. Please provide any evidence you have to support your answer to question 61.

63. Please provide evidence of likely costs of both reporting and independently auditing recycling and recovery rates.

64. Do you agree or disagree that the introduction of individual recovery targets for specific materials, including critical minerals would drive recovery of and demand for those materials thereby contributing to Net Zero and Circular Economy ambitions whilst supporting security of supply of certain materials? Please select one of the following options:

- \_\_\_\_\_ a. Agree
- \_\_\_\_\_ b. Disagree
- \_\_\_\_\_ c. Unsure

65. Please provide any evidence you have to support your answer to question 64.

66. If you agree with question 64: would you support the introduction of reporting on specified materials to form a useful evidence base ahead of setting targets in the future? Please select one of the following options:

- \_\_\_\_\_ a. Agree
- \_\_\_\_\_ b. Disagree
- \_\_\_\_\_ c. Unsure

67. If you answered agree to question 66, should these targets be mandatory or non-binding?

- \_\_\_\_\_ a. Mandatory
- \_\_\_\_\_ b. Non-binding



68. We require treatment facilities to demonstrate sound management of WEEE, including removal of specified hazardous material and POPs. Are there any other substances and components which should be added to the restricted list? Please provide evidence to support your answer.

69. What do you think are the key barriers to improving material recovery when treating WEEE? Please select one of the following options:

- \_\_\_\_\_ a. Information barrier
- \_\_\_\_\_ b. Technological barrier
- \_\_\_\_\_ c. Other

70. If you answered 'other' to question 69, please specify what this would be.

71. What information do you think suppliers of products should be required to provide to assist waste treatment operators to increase the recovery of specific materials or components commonly found in WEEE?

## Glossary

**ATF** – Authorised Treatment Facility

- Any waste site that has a permit or a permit exemption

**AATF** - Approved Authorised Treatment Facility

- An ATF with an additional approval that allows them to issue evidence of the re-use, recycling and recovery of WEEE.
- Must be permitted to accept and treat WEEE.

In Northern Ireland, this exemption is enshrined in Paragraph 49, Schedule 2, Part I of The Waste Management Licensing Regulation (Northern Ireland) 2003 (as amended)

**B2B** - Business to Business

- Alternative reference to non-household EEE or WEEE.
- EEE or WEEE that is designed for business/industry/professional use only.
- Does not include items that can also be used by householders

**BATRRT** - Best Available Treatment, Recovery and Recycling Techniques

- Published guide specific to WEEE. This is currently being updated

**CM** - Critical Minerals

- metals and minerals for which the extraction is a political, economic and environmental concern.

**DCF - Designated Collection Facility**

- A site which is approved to collect WEEE under the WEEE Regulations.
- Must comply with DCF Code of Practice

**DAERA** - The Department of Agriculture, Environment and Rural Affairs

- DAERA has responsibility for food, farming, environmental, fisheries, forestry and sustainability policy and the development of the rural sector in Northern Ireland
- The Department assists the sustainable development of the agri-food, environmental, fishing and forestry sectors of the Northern Ireland economy
- o DAERA has responsibility for food, farming, environmental, fisheries, forestry and sustainability policy and the development of the rural sector in Northern Ireland
- o The Department assists the sustainable development of the agri-food, environmental, fishing and forestry sectors of the Northern Ireland economy

**DEFRA** - The Department of Agriculture, Environment and Rural Affairs

**EEE - Electrical and Electronic Equipment**

- All electrical and electronic items are considered to be in scope of the Waste Electrical and Electronic Equipment Regulations (2013) unless they meet one of the exemptions as set out in regulation 7 of those Regulations

**EPR - Extended Producer Responsibility**

- This is a policy approach under which producers are given a significant responsibility – financial and/or physical – for the treatment or disposal of the products they place on the market when they become waste

**HWRC** - Household Waste and Recycling Centre

- These are provided by the Local Authority as a place where residents can safely dispose their household waste and recycling usually free of charge.

Most Local Authorities will register their HWRC as a Designated Collection Facility in order to be able to accept WEEE

**PCS - Producer compliance scheme**

- 'A producer compliance scheme (PCS) is a membership organisation. The members are producers of electrical and electronic equipment (EEE).
  - A PCS is responsible for registering all its members every year and must:
  - ensure it meets its financial obligations under the WEEE regulations
- fulfil its data reporting obligations

**POPs** - Persistent Organic Pollutants

- Manufactured chemicals that are banned under the Stockholm Convention on Persistent Organic Pollutants. The Stockholm Convention is an international environmental treaty that aims to eliminate or restrict the production and use of persistent organic pollutants.
- Includes common flame retardants such as DBDE (decabromodiphenyl ether) and others.

The use of POPs in new electrical products has been restricted in UK since 2006 under the RoHS Regulations.

- o Sister Regulations to the WEEE Regulations.
- o Limits the use of certain chemicals in EEE.

**RoHS Regulations** - Restriction of the use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012

**WEEE** - Waste Electrical and Electronic Equipment

Waste electrical and electronic equipment (WEEE) is any electrical or electronic waste, whether whole or broken, that is destined for disposal. 42