

## **Waste Electrical and Electronic Equipment Directive (WEEE) Conclusions of Implementation Review – supplementary paper**

### **Introduction**

1. In March 2006 the DTI published the findings and recommendations from the review of the implementation of the WEEE Directive in the UK.
2. Following the publication of the paper the Implementation Team have encouraged the stakeholder community to put forward their views and suggestions in how to develop the high level principles into a workable system which upholds the basic principles of the Directive.
3. The Implementation Team have met with groups of stakeholders representing, producers, retailers, the waste management industry, local authorities and representatives of the SME sector. Although the meetings concentrated on the broader picture, stakeholders have put forward valuable suggestions for the detail to underpin the policy.
4. The Implementation Team has fully considered the initial comments and views raised by stakeholders to the Recommendations Paper. Analysis of written responses received by 21 April will continue. Unless otherwise stated the policy outline in the Recommendations paper will remain unchanged although the written representations already received will be considered.
5. The attached paper outlines detail on:
  - Producer Compliance Schemes and Producer Registration;
  - Categorization of obligations;
  - Business to Business Obligations;
  - Evidence of Compliance;
  - Record Keeping and Compliance Reporting;
  - The Exchange System;
  - Distributor Deposit Scheme (formerly “Retail Compliance Scheme”)
  - An “appropriate” network of Designated Collection Facilities;
  - Role and Status of the Code of Practice;
  - Administrative Timeline for a typical compliance period.

### **What has changed?**

6. In light of representations received, and our own further work, we have made the following changes to the proposals issued in March:

- A proposal to calculate producer obligations through five categories of WEEE rather than total tonnage (see para. 21- 25);
  - The term “retail compliance scheme” to be replaced by “distributor Deposit Scheme (see para. 46);
  - Power of Secretary of State to appoint a distributor deposit scheme operator rather than approving applications and the intention to make an early appointment (see para. 49);
  - Safeguards to discourage a producer compliance scheme from handling level of WEEE greatly exceeding their member’s obligations. (see para 19 –20 and 45)
7. The detail underpinning other areas has also been developed.

### **Invitation**

8. The Implementation Team is grateful to those who have already made a contribution but would welcome further comments on the attached.
9. It would be helpful to the Implementation Team if responses focused on the following basic questions:
- Are the proposals workable?
  - If not which elements need further consideration?
  - What additional factors need to be considered in order for the proposals to work effectively?
  - Are there any loopholes that have been overlooked? *It would be helpful if this could be illustrated as scenarios with a possible solution outlined.*
  - Are there any contradictions between the various parts of the process?

### **Comments**

10. Comments and views on the attached paper should be sent no later than 19 May to [WEEE@dti.gsi.gov.uk](mailto:WEEE@dti.gsi.gov.uk)

**WEEE Implementation Team**  
**May 2006**

## **Introduction**

1. The following proposals outline the process for a “normal” compliance period. A process for the first compliance period will follow a similar pattern depending on the date of transposition and the beginning of formal implementation. It is envisaged the first compliance period may be shorter than the “normal” period.
2. In parts of the paper examples are given to illustrate a particular point. These should be read as examples – stakeholders may have different mechanisms to achieve the same objectives which will be considered.

## **Producer Obligations**

3. Under the Directive producers are responsible for funding the collection, treatment, recovery and recycling of WEEE arising at Designated Collection Facilities (DCFs) in proportion to their EEE market share (ie the amount of EEE they place on the UK market). Throughout the paper this process is referred to as “handling”.

## **Producer Compliance Schemes**

Note: All references to the “appropriate agency” refer to the environment agency registering the compliance scheme. Compliance schemes should seek registration with the agency covering the primary location of their business.

## **General Principles**

4. A Producer Compliance Scheme can take a number of different forms. Criteria for each of the forms will be detailed in the Guidance but stakeholders are welcome to put forward their views:
  - Private Scheme – comprised one producer (previously referred to as direct producer registration);
  - Closed Scheme – focused on a particular trading group – for example mobile phones;
  - Cluster Scheme – for example regional or smaller producers;
  - Fully open and non-discriminatory scheme representing a significant proportion of the total market.
5. Producer Compliance Schemes will discharge their member’s obligations under the WEEE Directive. Each scheme will:
  - Register with the appropriate agency all its members; and
  - Provide the required data to the appropriate agency.
6. Some schemes may be “paper only”, dealing only with these reporting responsibilities whilst allowing members to fulfil practical obligations themselves. For example, where a supplier already arranges reprocessing of WEEE as part of its business model it may wish to continue these

arrangements. However, the Government expects that most schemes will also:

- Make/arrange appropriate collections from DCF sites;
- Arrange the treatment and recycling of WEEE in proportion to the memberships obligations and obtain the necessary evidence of compliance;
- Help/guide members in providing up to date information to treatment and recycling facilities on the new products and their recycling potential.

### Criteria for Scheme Approval

7. To gain approval as a Producer Compliance Scheme the following criteria must be met:

#### *Collection Capacity (paper-only schemes)*

- Must be promoted as such to its members;
- Must ensure members are aware of the handling commitments they will need to fulfil.

#### *Collection Capacity (other schemes)*

- Must produce an operation plan showing the capacity to engage with and collect from a Waste Disposal Authorities (WDAs) and/or third party DCF sites – including DCFs established by its own members;
- Producer Compliance Schemes planning to collect from WDA operated DCFs must agree to adopt the terms of the Code of Practice which will set the minimum standards for agreement on the collection of WEEE from DCF sites;
- Must aim to collect sufficient WEEE to meet its members' obligations with over collection representing no more than 10% of those obligations.

#### *Scheme Viability*

- Must have a legal UK presence;
- Must have the capacity to discharge its members' obligations for a full compliance period ie January - December. *Producers will be committed to remaining members of a scheme for a full compliance period;*
- Must have adequate funds (for example in the form of insurance if appropriate or advanced membership fees) to cover the obligations of any member ceasing to trade in the compliance period.

#### *Reporting requirements*

- Must have in place the appropriate systems to report on a quarterly basis the actual levels of WEEE handled (by tonnage and category);

## Producer Compliance Scheme Approval Requirements

8. Producer compliance schemes will be approved by the appropriate environment agency for a period of three years. (This will apply equally to all models of compliance scheme).
9. Details of the proposed approval system are outlined in Annex 1
10. The agencies will publish a publicly accessible register of all approved compliance schemes before the beginning of each compliance period.

## Cancellation of Approval of Schemes

11. Agencies will be able to withdraw approval of a Producer Compliance Scheme if any one of the registration criteria is contravened and prompted corrective action is not taken when the contravention is drawn to the attention of the scheme operator.
12. The cancellation of the approval will have implications for the members of the scheme. The members (collectively) will be given the opportunity to appoint another operator to discharge their obligations.
13. If no agreement on an alternative can be made the Regulations will allow the Secretary of State to appoint another operator to manage the scheme until the end of the compliance period. This will be a final option as it is hoped in such circumstances members will be able to reach agreement on the way forward with minimum Government intervention.

## Registration of Producers

14. All producers placing EEE onto the UK market during a compliance period must be registered. Obligations to register must be discharged via a registered compliance scheme (if approved as a "Private Scheme" the producer will still be required to register annually) following the models outlined in Para 3.
15. A Producer Compliance Scheme will have responsibility for registering each of its members for each compliance period. Although members cannot change schemes mid compliance period, annual registration will allow members to change schemes before a new compliance period begins, to reflect their business needs.

16. The agencies will publish a publicly accessible register of all producers, including registration number, address etc alongside the Compliance Scheme register.

#### Late, Incomplete and Inaccurate Applications

17. Producers entering the UK market after 31 October will be able to register after that date for the following year, via a compliance scheme. The registration and supporting indicative figures for market activity will need to follow the same format as for other member registration. Members entering the market late will have obligations from the point they enter the market. New entrants to the market must submit an application for registration within two months of entering the market.
18. Late applications from other producers and applications that are incomplete or inaccurate will incur additional administrative fees. Producers will still need to meet their financial obligations for the full compliance period.
19. Ultimately if the information required is not supplied the compliance scheme registration may be removed.

#### Avoiding Monopoly

20. Some responses to the March paper have indicated a concern that some producer schemes may seek to handle much more WEEE than would be indicated by their members' obligations. This could have adverse consequences for producers, which are not members of those schemes.
21. To avoid this possibility we propose to limit the Exchange's payments to any one scheme in respect of surplus WEEE to the value of 5 % of total WEEE arising. (*Stakeholders are invited to comment on this figure – is it too high etc what would be a better cut off point*). Any additional surplus would need to be presented to the Exchange without further payment. This removes any incentive to handle excessive amounts of WEEE. Furthermore it has always been intended that a condition of registration, producer compliance schemes would have to aim to handle WEEE broadly in accordance with their member's obligations. Persistent departure for that aim could lead to withdrawal of the scheme's approval.

#### Categorisation of Obligations

22. The Directive divides WEEE into 10 categories, each of which will have different waste management requirements and associated costs.

23. Some stakeholders have expressed concerns over the calculation of producer obligations based on single tonnage figures.
24. Having considered the options put forward, we have identified two options for the way forward and would welcome stakeholder views:

#### Option A

25. A system based on five categories up to the point of normal separation and outlined in the developing Code of Practice. ie:
- Large household appliances except those subject to ozone depleting substances regulations;
  - Large household appliances subject to ozone depleting substances regulations;
  - TVs and Monitors;
  - Fluorescent Tubes
  - All other WEEE

#### Option B

26. A system which mirrors the targets and category groupings in Article 7 of the Directive:
- Categories 1 and 10;
  - Categories 3 and 4;
  - Categories 2, 5, 6, and 9;
  - Fluorescent Tubes.
27. Financial obligations will be based on the categories and the market information supplied by producers and schemes.
28. Evidence (both as part of the Declaration of Compliance and for selling/purchasing purposes through the Exchange mechanism) will be subject to the same divisions in categories.

#### **Business to Business (B2B) Producer Obligations**

29. The Directive aims to ensure that WEEE is treated, recovered and recycled to the same standards and recovery targets as household WEEE. The regulations will aim to promote the use of existing mechanisms for dealing with WEEE through the use of contractual arrangements.
30. Member states are required to report to the Commission on the amounts of household WEEE handled per head of population. There are no corresponding reporting requirements for non-household WEEE.

### Division of responsibility

31. Producers will be responsible for handling WEEE arising from:
  - B2B EEE placed on the market after the 13 August 2005; and
  - B2B EEE placed in the market before 13 August 2005, which is being replaced on a like for like basis or with an item of similar use.
32. Producers may choose to contract with business customers to discharge these responsibilities on their behalf.
33. Responsibility for handling all other EEE placed on the market before 13 August 2005 will fall to the business end-user. Responsibility for leased equipment lies with the lessor.

### Duties of Producers

34. Producer Schemes will be required to supply the relevant environment agency with details of the level of B2B EEE placed on the market (as outlined in Annex 1), the quantities of WEEE arising (ie collected and recycled) and the quantities of WEEE/EEE refurbished and sold on.
35. The evidence chain for WEEE will mirror the requirements for household WEEE.
36. Producers can discharge their obligations through a compliance scheme as outlined in Para 3. Obligations can be discharged through a third party (ie a formal contractual arrangement) but overall responsibility must remain with the producer.
37. Where a producer supplies both B2C and B2B they can register with more than one compliance scheme provided the two trading arms can be distinguished easily for reporting purposes. They may however, as an alternative join one compliance scheme to reflect the bulk of their business and use the services of another scheme to discharge their obligations but have a single reporting route (ie through one compliance scheme) back to the EAs to show they have met their obligations.

### Responsibility of end-users

38. Where a business end-user has responsibility for the handling of WEEE (in the circumstances described in para 34) this could be dealt with through the waste Duty of Care as set out in section 34 of the Environmental Protection Act 1990. Defra is planning to consult on amendments to the duty of care regime shortly and this issue will be highlighted. Further information on duty of care can be accessed via: [http://www.defra.gov.uk/environment/waste/management/doc/pdf/waste\\_man\\_duty\\_code.pdf](http://www.defra.gov.uk/environment/waste/management/doc/pdf/waste_man_duty_code.pdf)

39. There will be no additional reporting requirements placed on business end-users.

### **Evidence**

40. Producers and producer compliance schemes will need to submit Declarations of Compliance at the end of each compliance period to show they have handled enough WEEE to satisfy their obligations.

41. Each Declaration must be supported by evidence notes from ATFs on the amounts of WEEE they have received by category, tonnage and treated and recycled to the standards outlined in the Directive.

42. It is envisaged the first ATF to handle the WEEE will issue or obtain and provide the evidence note to the body with the direct contractual relationship with the producer or compliance scheme.

43. The ATF will need to have systems in place to confirm WEEE it treated, reprocessed and recycled in line with the Treatment Regulations and standards outlined in the WEEE Directive.

44. Producer/compliance schemes will need to keep records on the mass of WEEE entering treatment facilities and reprocessors.

### **The Exchange and Trading of Evidence**

45. The Exchange will provide a safety net for stakeholders involved in the WEEE process:

- a. Producers/Compliance Schemes which have over collected their notified obligations will have a route to sell the surplus evidence at cost (subject to para 47) and therefore not cover other producers obligations;
- b. Local Authorities which have been unable to secure Producer Compliance Scheme collection from their sites (ie have received no acceptable offers or approaches from producer compliance schemes) will receive reimbursement for their costs related to the handling of the WEEE;
- c. Producers/Compliance Schemes which have been unable to collect sufficient WEEE to meet their notified obligations will be able to buy evidence they need at a fair price. This will be determined as the average price paid by the exchange under a. and b. above.

46. There will be restrictions on trade with the Exchange to ensure it remains a last resort.
- WDAs will not be allowed to sell evidence to the Exchange unless they can demonstrate that they have made best efforts to reach agreement with producer compliance schemes to secure collection from their sites;
  - Payment from the exchange to any individual producer compliance scheme will not exceed the value of 5% of the total WEEE arising over the compliance period. (See para.21).
47. The exchange will purchase “evidence” at cost – this will include cost of collection, transportation and handling of the WEEE. The Exchange will sell the WEEE at cost plus an appropriate administration charge.
48. The arrangements for the Exchange will ensure that it operates on a cost recovery basis only – no surpluses or deficits will arise.

## **Distributor Obligations**

Feedback from stakeholders have suggested that the use of the expression Retail Compliance Scheme (RCS) may cause confusion, for example a retailer/producer may think that by joining the “retail “compliance” scheme they are discharging their obligations as both a retailer and a producer. To avoid this confusion we are suggesting that the description now be changed to “Distributor Deposit Scheme”.

### General Principles

49. Under the WEEE Directive “distributor” is defined as including retailers/distance sellers and manufacturers making direct sales to consumers.
50. Under the Directive distributors are obliged to offer facilities – free of charge – for consumers to deposit old or discarded EEE. Such items must then be made available to producer compliance scheme for collection and transportation to approved treatment facilities (ATFs).
51. This obligation can be discharged in two ways – via in store take-back or if a distance seller, free collection on delivery service (when a consumer is purchasing a similar item or an item for similar use) or through a distributor deposit scheme.
52. The weight of representation to date supports the early creation of one national distributor deposit scheme. We therefore propose that the Regulations give the Secretary of State powers to appoint distributor deposit schemes for three compliance periods. An open competition will be held to select the national scheme. The rules of the competition will indicate the criteria for selection of a national scheme. Before a scheme is selected copies of applications will be placed on the Department’ internet site for one month. The Department will take into account representations

made about the applications, and will if appropriate impose conditions on the body appointed. This process should ensure that the scheme operates in the interests of all its potential members.

53. If, in time, there is demand to create additional distributor deposit schemes, the Department will consider the case for making further appointments. One example could be collectives of distributors serving communities in rural or isolated areas.

### **An “appropriate” network of Designated Collection Facilities (DCF)**

54. Stakeholders have raised questions on the characteristic of a Designated Collection Facility (DCFs) and what would constitute an adequate network.
55. An adequate DCF network should as a minimum cover a similar geographical pattern as the existing CA site infrastructure to provide adequate public access to those wishing to deposit their WEEE. “Third party” operated DCF sites should supplement this. Such sites could be retailer platforms, B2B producer sites, or additional sites established by groups of distributors – for example covering out-of-town shopping centres. Such sites would need to meet minimum standards for a DCF and will be listed on a publicly accessible register detailing geographical location and facilities offered (ie categorises of WEEE collected and if open to the public).
56. The development of DCF sites should not be seen as the solution to resolving issues around the CA current infrastructure. For example if a CA site does not already exist in a particular area, requirements will not be placed in WDAs to develop new facilities.
57. The Code of Practice Group is developing a framework for the characteristics and functions of a DCF and the relationship between producers, distributors and WDAs. Although there is still some work to be done to finalise the Code of Practice, their emerging conclusions on the basic characteristics of a DCF and how it should work are outlined in Annex 2.
58. A DCF operator will need to adopt the Code of Practice to make deposited WEEE available to Producer Compliance Schemes (This does not apply to DCFs established by Producer Compliance Schemes or the refurbishment industry).

### **Role and Status of the Code of Practice**

59. A group of stakeholder representatives (Producer Compliance Schemes, WDA, Distributor Deposit Schemes. producers and distributors, and the

refurbishment sector) are developing the Code of Practice as the basis for agreement and good practice on how relationships between the stakeholder communities will work.

60. The Code will specifically cover the arrangements for separation and collection of WEEE from DCF sites controlled by WDAs and which give public access.
61. The code addresses and gives guidance on the minimum standards for DCF sites, reuse issues, scheduling of collection, contingency planning in the event of WEEE not being collected and resolution of disputes.
62. The Implementation Team are grateful for the work undertaken by the Group and hope that the processes outlined in the paper will aid the further development.
63. Successful agreement on the status and principles contained in the Code of Practice will give further control of the process to the stakeholder community and it is hope this will be achieved in the near future.

#### **Administrative Timeline for a typical Compliance Period**

64. The Directive requires reporting on a calendar year basis. A specific timeline for the first Compliance Period will be published as part of the formal consultation exercise when the transposition and implementation dates are known.
65. The Administrative Timeline for compliance will be divided into three phases:

#### Producer Compliance Schemes

- Phase 1 Pre-Compliance Preparation – 1 August to 31 December
  - ✓ By 31 August - submit an application to operate a Producer Compliance Scheme;
  - ✓ By 1 October - all decisions taken on Producer Compliance Scheme registration with acceptance or refusal;
  - ✓ By 31 October members of Producer Compliance Scheme registration information to be with EAs;
  - ✓ By 31 December – New Producer Registration numbers issued (previously issued numbers will carry over unchanged from year to year until withdrawn);
  - ✓ By 31 December – Aggregate and individual indicative market share percentage issued.
- Phase 2 Compliance Period 1 January – 31 December
  - ✓ By 30 April information on levels of WEEE (by category) arising notified for first quarter to EAs;

- ✓ By 31 July information on levels of WEEE (by category) arising for second quarter notified to EAs;
- ✓ By 31 October information on levels of WEEE (by category) arising for third quarter notified to EAs
- Phase 3 Post Compliance 1 January – 31 May
  - ✓ By 31 January information on levels of WEEE (by category) arising for fourth quarter notified to EAs.
  - ✓ By 28 February information on levels of EEE placed on the market notified to EAs;
  - ✓ 31 March final notification of financial obligations made;
  - ✓ 30 April Declaration of Compliance presented to EAs.

Producer Compliance Schemes will only need to seek registration every three years but will need to register their members, with relevant information annually.

The environment agencies will seek to update producer compliance schemes with up to date information, based on the quarterly returns (as above) to assist fine-tuning of producer compliance scheme operation and minimise over collection.

## Distributor Compliance Schemes

### Phase 1 Pre-compliance preparation

- ✓ By 31 August – submit an application to operate a Distributor Deposit Scheme;
- ✓ By 15 September – approval of registration notified.

Distributor Deposit Schemes will be required to seek registration every three-years although new schemes can make applications in each pre-compliance period.

Distributor Deposit Schemes will need to notify the agencies of DCFs wherever producers have not taken on collection responsibilities as soon as the position is clear.

## Producer Obligations Information Needs and Registration Process

### Compliance Schemes

#### Information requirements

The application form will require the following information:

1. Name of scheme;
2. Name of operator of the scheme – ie the legal entity which must be UK based;
3. Contact details of the scheme operator;
4. Address for service notices if different from 3 above;
5. Names and contact details of scheme members (where known at time of registration application);
6. Amounts in tonnes of EEE (per category and distinguished between private household and B2B) that each member so far identified, anticipates placing on the market in the UK during the first compliance period of the 3-year registration being sought;

Applications for registration of compliance schemes must be accompanied by the following documentation:

- Registration fee (to cover the 3 year period)
- The constitution of the scheme.
- The operational plan of the scheme.

#### A Scheme Constitution

A Scheme Constitution will need to be submitted with the application.

The level of detail needed in the constitution will vary according to the range of scheme membership, with single-producer (private) schemes requiring little, and specialised or fully-open schemes with wide range of large and small producers requiring greater detail.

The constitution should include the following details:

- Legal Status and division of responsibility for example:
  - i) If legal entity, then responsible for obligations
  - ii) If consortium, then individual members held proportionately responsible
- Membership rules – in line with the regulations for example:
  - iii) Membership must run for a whole compliance period or part of a period if the producer is new to the market;
  - iv) Timetable to notify the scheme of an intention to leave
  - v) Obligations to provide accurate information needed to register members with the EA's;

- Membership fee structure
- Membership policy for example, minimum or maximum size of membership whether or not capable of signing up members with dual household/B2B obligations.

### An Operational Plan

An Operational Plan will form part of the required registration information requirements. It should include:

- How the scheme intends to discharge the financial obligations of its members, In particular, what arrangements it intends to put in place with DCFs, ATFs and accredited re-processors;
- Arrangements for handling B2B (if applicable);
- How the scheme will discharge other obligations of members under the regulation e.g. record keeping, compliance reporting;
- How the scheme will prioritise, where appropriate, the reuse of whole appliances in a manner consistent with the objectives of the Directive;
- Details of relationships with DCF including, WDAs, 3<sup>rd</sup> party's and those established by members, including how it will comply with the Code of Practice;
- Collection contingency plans.

### Registration Process

An application for registration should:

- Be made no later than 31 August for 3 compliance period beginning the 1 January after the application is made – *for example applications made on 31 August 2008 will take effect on 1 January 2009 and will expire on 31 December 2012* (Compliance Schemes are free to submit applications before the 31 August);
- Application should be made using the form supplied, free of charge, by the appropriate agency. Paper or electronic media will be accepted;
- Applications will be granted or refused within 28 days of receipt.

### Registration of Compliance Scheme members

Applications for the registration of members must be made by the 31 October for the following compliance period. (ie 1 January of the next year).

Applications must be made using the agencies application form (which will be supplied free of charge) Paper and electronic media will be accepted.

Information needed to registration each member will include:

- Name of Producer and the “Brands” they produced;
- Level of EEE placed on the market by the producer in the preceding calendar year. The data should be split by each of the five categories:
  - Number of units placed on the market
  - Total tonnes placed on the market

- Indications of EEE intended for household or B2B use.
  - Level of business undertaken directly with a consumer ie direct distribution channels.
- Level of EEE placed on the market by the producer in the preceding calendar year. The data should be sliced by category and as follows:
  - Total tonnes placed on the market;
  - Splits between B2B and B2C;
  - Number of units placed on the market;
  - Level of business undertaken directly with the consumer – ie direct distribution channels.

## **Characteristics of a Designated Collection Facility**

A DCF must:

Meet relevant licensing/exemption requirements under waste legislation. There are no intentions to supplement existing licensing requirements specifically aimed at WEEE;

Enable WEEE to be collected by the five categories:

- a) Large Household appliances (Cat 1) other than appliances containing refrigeration subject to the Ozone-Depleting Regulations;
  - b) Appliances in Cat 1 containing Ozone Depleting substances;
  - c) TV's and Monitors;
  - d) Fluorescent Tubes
  - e) All other WEEE.
- The capacity to accommodate (if required) containers for (c)-(e) and hard standing or containers for (a) and (b);
  - Where size, local policy requirements, layout or accessibility, fewer streams may be collected provided;
    - Streams are not mixed;
    - Alternative sites able to collect the remaining categories are located within the WDA or within reasonable travelling distance;

DCF sites can be:

- Existing CA sites;
- Existing Waste Transfer Stations;
- Operated by the refurbishment/reuse industry;
- Operated by local community bodies or distributor representatives – ie out-of –town shopping centres;
- Operated by registered producers or retail platforms. Such DCFs will not be obliged to follow the Code of Practice but must make deposited WEEE in excess of their or their compliance schemes obligations, available to other schemes.

## Annex 3

### Compliance Reporting and Record Keeping

#### Producers

Producers Compliance Schemes will be required to keep the following records for a period of 6 compliance periods:

- Up-to-date records of all members -eg, name, address, brands, EEE put on market every quarter by category;
- Records of all producer DCFs operated within the scheme, address, volume of EEE collected every month by category;
- Record of DCFs that collecting from, copies of agreements in place, address, volume of EEE collected every month by category
- Contracts in place with 3<sup>rd</sup> parties to discharge producers' obligations for example, haulage companies, and authorised treatment facilities, B2B/other service provider.
- Evidence records - *as described under Evidence*

#### Producer Schemes- Reporting Requirements

- Register members with EAs;
- WEEE collected from DCF (including those within scheme) on quarterly basis;
- Report EEE of members annually;
- Produce declaration of compliance for all members with supporting evidence by required date.

#### Distributors

##### Distributor Deposit Schemes - Record keeping

- Up-to-date records of all members- this includes, name, address.
- Maintain list of approved DCFs, and record/evidence that they meet DCF requirements.
- Maintain geographic database/ how many retailers members of scheme operating in each WDA and how many public access DCFs and other DCFs are registered.

##### Distributor Deposit Schemes - Reporting

- Maintain up-to-date list of DCFs on web- public assess;
- Maintain up-to-date list of distributor DCFs giving public access on web (name/ addresses of all stores);
- Report on WEEE collected from DCFs (Quarterly)- by third parties (ie as a result of being unable to secure producer collection).