

# The Circular from ERP

Q3 - October 2021



# Contents





# Message from our Managing Director



**John Redmayne**

Managing Director of ERP-UK

## In our previous edition I flagged 2021 as a year of consultations!

EPR for packaging remains 'the big one'; we have yet to see summarised consultation responses published and a response to these from government - but expect these sometime this quarter. The scale of changes

proposed remains huge and still lacking in the sort of detail which will allow producers to understand the practical and financial impacts on their business.

The consultation on WEEE is now expected at the end of the year – and we anticipate that the batteries consultation will not now appear until early next year.

The landscape keeps evolving though – in this edition you will find updates on both short-term and long-term developments which I hope you will find both interesting and useful:

- Plastic Packaging Tax – our new web page provides key information on liabilities and of course our Data Service team are able to assist in collecting and calculating data for submissions.
- We expect a revised Distributor Take-Back Scheme (DTS) to be announced to cover the period from 1.1.2022 to the start of revised WEEE Regulations.
- Scotland's Deposit Return Scheme (DRS) is getting ready for the start of operations in July 2022 – though we understand that this date remains subject

to a review.

- Lastly, if like me, you have seen (and picked up!) too much plastic on trips to UK beaches this summer the article on future EPR for fishing gear makes interesting reading.

I am sure you know we are part of the Landbell Group – providing support and services to customers like you on an increasingly global basis. ERP Brazil has just started operating after many years of development by my colleagues from ERP Portugal & Spain, and a customer service office recently opened in Singapore. To keep in touch with these and other developments I recommend you also subscribe to Landbell's [newsletter](#).

Together our WEEE schemes reached a significant milestone – 4 million tonnes collected and treated.

ERP are here to help you - our teams are in our offices more frequently now and available to meet you online (of course) and in person (if you prefer) - so if you have any queries or additional service needs, please contact your account manager.



## WEEE and Battery Data Rounds

It's almost time to report your Q3 2021 battery and B2C EEE! You will be able to report data from 1st October, and we ask that all members submit their data no later than 15th October. We also kindly ask all members to:

- Ensure that all EEE and batteries made available to the UK market are reported in the relevant reporting periods (see table below);
- Have submissions approved by a legal signatory of the company or delegated authority who has prior written consent for 2021;

- Explain any fluctuations in data by including a brief explanation within the data submission.  
Please note that comparisons are made against the data from the same period of the previous year (for example, your Q3 2021 data will be compared against your Q3 2020 submission).

Please contact your account manager should you require any assistance with your data

| Reporting Periods                      | Reporting Deadlines             |
|--|---------------------------------|
| Q1: 1st January to 31st March          | Thursday 15th April 2021        |
| Q2: 1st April to 30th June             | Thursday 15th July 2021         |
| <b>Q3: 1st July to 30th September</b>  | <b>Friday 15th October 2021</b> |
| Q4: 1st October to 31st December       | Friday 14th January 2022        |
| 2021 B2B EEE: 1st Jan to 31st December | Friday 14th January 2022        |



## 2022 Annual WEEE and Battery Registrations

The Compliance Team have started preparations on WEEE and Battery registrations for the 2022 compliance year. We are now working to ensure all members are registered and need confirmation of your details by the following dates:

- Battery members -15th October
- WEEE members (B2B & B2C) -15th Nov.

Earlier deadlines have been provided to members to ensure that everything is ready with time to spare before the legal deadlines!

In order to support us with your registrations, we have request that members confirm their registration details by returning their Confirmation of Company details documents to their account manager as soon as possible.



## Changes to the Distributor Take-Back Scheme (DTS):

From 1st January 2022, only Distributors (businesses selling EEE in stores or online) to which either of the following criteria apply will have the option to join the DTS:

- businesses selling less than £100,000 of EEE per year;
- businesses only selling EEE online.

All others will need to provide in-store take-back of WEEE.

Please note that the current DTS operates only until 31st December 2021. However, ERP understand that a further scheme has been proposed and is expected to be in operation for 2022 - and until revised WEEE Regulations come into effect.

## Take-Back by ERP UK:

ERP offers a range of take-back solutions using our network of compliant collection and treatment providers. If you are interested in our take-back solutions, please contact your account manager or visit our website for more information. We will then find out more about your requirements and provide some options to suit your needs.

## Communications

Retailers providing in-store take-back of WEEE also have an obligation to provide written information to customers. Recycle Your Electricals produced an OPSS/BEIS approved communications toolkit which retailers might find helpful and we would recommend.

[ukcompliance@erp-recycling.org](mailto:ukcompliance@erp-recycling.org) or visit our [website](#)



## Plastic Packaging Tax

From April 2022, the government will be introducing a tax on plastic packaging which is manufactured or imported into the UK with a recycled content of less than 30%.

A £200 per tonne tax value will be applied to any plastic packaging which contains less than 30% recycled content.

Additionally, even if your business only handled plastic with more than 30% recycled content, you may still be required

to register for the tax if you are manufacturing/importing more than 10 tonnes of plastic packaging in the UK.

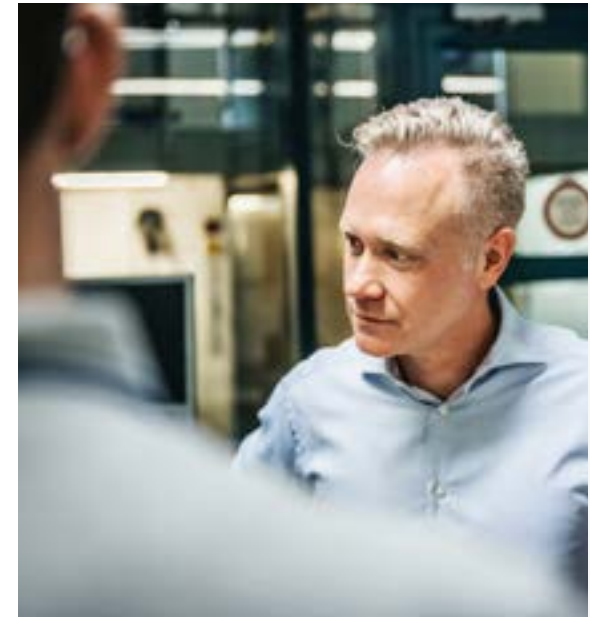
We urge all businesses that handle plastic packaging to familiarise themselves with the tax and requirements. ERP are on-hand to help with any queries you may have, so please contact your account manager, or [ukplasticpackagingtax@erp-recycling.org](mailto:ukplasticpackagingtax@erp-recycling.org) if we are able to provide any support to your business.

## ERP launches new Plastic Packaging Tax webpage

ERPUK are proud to announce the launch of a new Plastic Packaging Tax webpage.

On this page you will find information you need to know about PPT. Additionally we have included a short web enquiry form should you require further assistance.

Please visit our plastic packaging tax webpage [here](#).



## Extended Producer Responsibility Consultation for Packaging

The Joint Trade Associations (JTA) with support from ERP, has recently published their response to the proposed reforms, emphasising the key high-level issues with the proposals. The JTA represents and promotes the views of UK trade associations whose members are active in the electromechanical sector, with the purpose



of supporting the effective operation of producer responsibility regimes.

This has led to several areas of common concern across the sector, including:

- Lack of producer control across many areas such as the definitions & extent of full-net costs, setting & meeting collection targets, seeing an Administrator have sole control over the household packaging waste system with little producer involvement, and being required to comply with yet unspecified labelling requirements.
- Full Net Cost Principles being exceeded due to the range of activities intended to be funded by producer.
- The 'One size fits all' model is not appropriate, with concern that what works in one sector may not work in others.
- Unrealistic implementation timescale.
- Risk of 'freeriding' by non-UK based companies, which may provide unfair competitive advantages to such organisations.
- Unclear cost burdens. Significant costs estimated, which cannot be assumed to be absorbed by producers, particularly those operating with low profit margins.



## Deposit Return Scheme in Scotland

Alongside the Packaging Extended Producer Responsibility (EPR) consultation, the government are also discussing the implementation of a deposit return scheme for single-use beverage containers in England, Wales, and Northern Ireland. The cost of operating this system will be borne by the brand owners of the products.

Scotland has already decided to introduce their own system from July 2022. This

introduction will see a 20p returnable deposit levied on drinks containers as they are sold. Customers will be able to redeem this 20p if returning the used drinks container to be recycled.

The same rules will apply if your business is based outside of Scotland, but still supplying into the country. This also applies if you are supplying via online sales channels into Scotland. Both brand owners and retailers supplying beverage containers into Scotland should be aware that they may be required to register, operate return points, or handle return of deposits from as early as July 2022.

Circularity Scotland are responsible for administering the scheme, and further details (including FAQs) can be found on their website [here](#).

ERP are also happy to help with any questions or queries you may have, so please contact your account manager, or email [ukcompliance@erp-recycling.org](mailto:ukcompliance@erp-recycling.org), for further information.



### Analysis of Extended Producer Responsibility Schemes – report commissioned by ERP/Landbell

ERP has recently published a study from think tank adelphi to conduct a new study on the impacts to circular economy in extended producer responsibility (EPR) systems with competition between multiple producer responsibility organisations, compared with monopolistic systems without competition.

The study follows as the Netherlands recently moved from a competition-based compliance scheme WEEE system, to monopoly in 2020.

Equally, future UK packaging EPR suggestions include a monopoly approach. The study found several key results, including:

- Producer responsibility organisations (PROs) operating in a competitive environment show a strong focus on driving innovation and improving the services offered to producers.

Monopolistic systems, on the other hand, tend to focus on promoting system-level innovations which can be effective but also costly.

- Competitive EPR schemes tend to lead to higher producer satisfaction, in particular since producers can choose between different PROs and select the best price-service level ratio.
- Competitive tendering by multiple PROs can keep costs for waste management activities such as collection, sorting, and recycling low and finally close to the necessary costs for producers, driven by the PROs' strong self-interest in minimising operating costs. In monopolistic systems, this self-interest is often less pronounced.

- The tendering of waste management services by several competing PROs also benefits the maintenance of a diverse landscape of waste management service providers preventing a concentration of market power in a few service providers. This, in turn, leads to cost efficiency resulting from the competition between a comparably larger variety of waste management operators and recyclers.

Other results are listed in the full report, as well as recommendations on how to further strengthen the performance of competitive EPR schemes. Please contact your account manager if you would like any more information on the report, or for downloadable copies.





### Dixons Carphone launches polystyrene take-back scheme

Electrical retailer Dixons Carphone, the business behind Currys PC World, has launched a scheme enabling customers to return expanded polystyrene packaging to stores for recycling for free.

After a trial period across 14 stores taking place over six weeks this summer, Currys PC World rolled out its customer drop-off service to all its UK stores.

To begin with stores will only accept expanded polystyrene associated with TV packaging, but Dixons Carphone says it will look to collect different types as consumer demand and uptake increases.

Chris Brown, Dixons Carphone's senior sustainability operations and compliance manager, said: "We're proud to be the first retailer to enable customers to drop off their TV packaging in stores for recycling".

"Now customers can have their polystyrene taken away at delivery or drop it off at one of our stores."

"Whatever they choose we'll take it off their hands and ensure we reuse or recycle it in a responsible way, helping customers do their bit for the planet."

### Insulation panels

Once collected, the expanded polystyrene is sorted at Dixon Carphone's Newark facility. Third parties DHL Envirosolutions and Dutch firm De Vries Recycling then turn the compacted expanded polystyrene into insulation panels for housing.

Please follow the link to read the full article;

<https://www.letsrecycle.com/news/dixons-carphone-launches-polystyrene-take-back-scheme/>



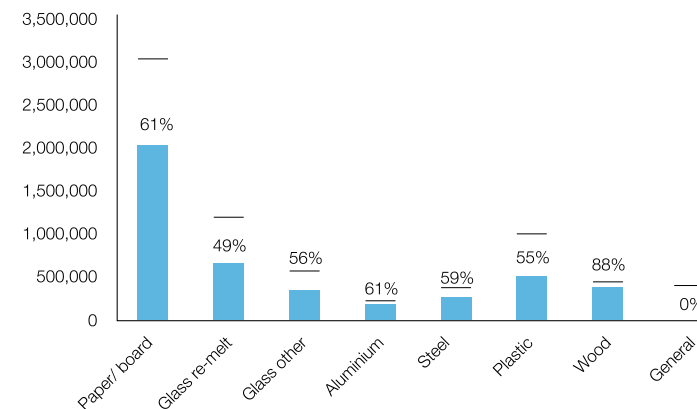
## Plastic Packaging Tax

Find out how ERP UK can help your business

Visit our Plastic Packaging Tax [webpage](#)



The data within this chart shows that we are on-track to meet our compliance for the year



### Packaging – PRN Market Update

After the uncertainties created by the lock-downs, PRN prices have generally drifted lower as economic activity has returned to near-normal levels. Once again, the PRN system has responded quickly to changes in the materials markets.

The exception has been in Glass where, despite the re-opening of the hospitality sector, prices have remained at near the highs for the year.

Plastic PRN prices have settled back to more reasonable levels on the back of a

sound performance by the domestic reprocessing sector.

Although we do not expect any national shortage of PRNs this year, high global freight rates may again exert upward price pressure on PRN prices for material exported for reprocessing before the year-end.

The general recycling obligation will be met with excesses from the material-specific PRNs.

### Packaging – Data for Q2 2021

At the end of August the Environment Agency released data for material accepted in the UK for domestic and overseas reprocessing for the first two quarters of the year.

The chart above summarises the position of each obligation class.

The blue line represents the UK requirement for each and the percentage shown is that of the requirement that has already been accepted.

## WEEE - Analysis of government data for UK WEEE collections

The table below shows Q1/Q2 2021 WEEE collected data against the 2021 Defra targets.

At this half way point through the year it is encouraging to see that collections for LDA, Cold and Display are at or above 50% - suggesting that collection volumes are in line with the target expectations.

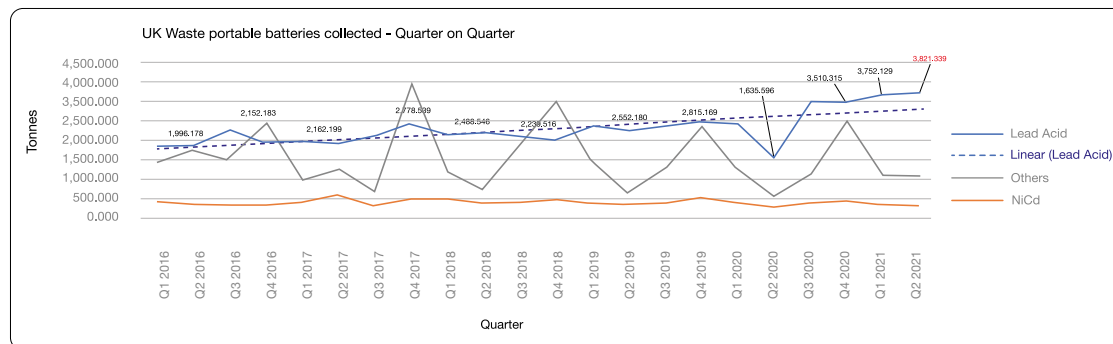
Small Mixed WEEE collections are behind target expectations – a similar picture to previous years, as are PV panels and lamps.

Below is Q1/Q2 2021 WEEE collected data against the 2021 Defra targets

| Category      | Q1-Q2 2021 UK WEEE collected | 2021 DEFRA targets | Progress to targets % |
|---------------|------------------------------|--------------------|-----------------------|
| LDA           | 94 490                       | 187 398            | 50%                   |
| COLD          | 69 021                       | 137 030            | 50%                   |
| DISPLAY       | 20 150                       | 37 726             | 53%                   |
| Cats 2-10 SMW | 62 379                       | 137 056            | 46%                   |
| LAMPS         | 1 888                        | 4 145              | 46%                   |
| PVP           | 126                          | 274                | 46%                   |
| <b>TOTAL</b>  | <b>248 052</b>               | <b>503 629</b>     | <b>49%</b>            |

## Batteries

UK waste battery collection tonnages continue to increase, especially portable lead acid.



As expected, there was a significant increase on waste portable batteries collected in Q2 2021 vs Q2 2020 – worth noting that Q2 2020 was the peak of the first lockdown

|              | Q2 2020          | Q2 2021          | % Variance     |
|--------------|------------------|------------------|----------------|
| Lead Acid    | 1 635 596        | 3 821 339        | 133.64%        |
| NiCd         | 30 820           | 64 454           | 109.13%        |
| Others       | 400 118          | 1 071 510        | 167.80%        |
| <b>TOTAL</b> | <b>2 066 534</b> | <b>4 957 303</b> | <b>139.88%</b> |

For a more realistic comparison, there was also a fairly significant increase in Q2 2021 vs Q2 2019:

|              | Q2 2019          | Q2 2021          | % Variance    |
|--------------|------------------|------------------|---------------|
| Lead Acid    | 2 552 180        | 3 821 339        | 49.73%        |
| NiCd         | 121 476          | 64 454           | -46.94%       |
| Others       | 505 984          | 1 071 510        | 111.77%       |
| <b>TOTAL</b> | <b>3 179 640</b> | <b>4 957 303</b> | <b>55.91%</b> |



## Celebrating

A special achievement by  
ERP and Landbell Group

**15** EUROPEAN  
COUNTRIES

A lot of different  
regulations.



**4 million  
tonnes**  
of WEEE collected!

### RECYCLING 4,000,000 TONNES OF WEEE EQUALS...

1



Saving enough energy to power  
1,000,000 homes for a year



2



Preventing the release of 6,000 tonnes  
of ozone depleting substances

3



Preventing the emission of  
43,400,000 tonnes of CO<sub>2</sub>

4



Recycling: 114 million fridges, 85 million washing  
machines, 16 billion small domestic appliances,  
300 million televisions, 3 billion laptops

5



Preventing the excavation of 8,957,756  
cubic metres of landfill



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### Future view - EPR for Fishing Gear

The scope of products covered by the Extended Producer Responsibility (EPR) requirement in the EU goes beyond products that are traditionally associated with the Polluter Pays Principle, i.e. electrical and electronic equipment, batteries and accumulators, and packaging. The Directive (EU) 2019/904 on the reduction of the impact of certain plastic products on the environment (the so-called “Single Use Plastics” Directive) introduces certain obligations for Member States and producers of fishing gear. Among others, it stipulates the establishment of EPR schemes for plastic-containing fishing gear in each Member State latest by 31 December 2024.

SUP Directive defines fishing gear as any item or piece of equipment that is used in fishing or aquaculture to target, capture or rear marine biological resources or that is floating on the sea surface, and is deployed with the objective of attracting and capturing or of rearing such marine biological resources. The definition does not exclude recreational fishing, therefore manufacturers producing for this segment are also likely to be affected by the planned changes.

While there is no hard data on POM, i.e. volumes put on market each year (currently, Member States are not obliged to monitor and report these volumes), an educated guess says that the annual POM in Europe is in the range of 100,000 tons:

The biggest producers of fishing gear in Europe are Norway, UK, Italy and Spain. The biggest consumption of fishing gear is expected where fishing catches and agricultural production are the biggest:

According to field studies, fishing-related waste represents 27% of plastics littering EU seas and beaches. A big share of the fishing gear that is put on the market is not collected for treatment. Abandoned, lost or otherwise discarded fishing gear containing plastic poses a high risk to the marine life, its biodiversity and even human health. Fishing gear floating in the sea or stockpiled on the beach may also act as a repellent for tourists and deprive marine regions of an important part of income.

As per article 23 of the SUP Directive, the

Estimation of annual POM in Europe:

| Source  | Scope                        | Fishery Industry | Aquaculture Industry | Sum               |
|---|------------------------------|------------------|----------------------|-------------------|
| EU Commission   | EEA without Norway & Iceland | n/a              | n/a                  | 53.800t           |
| Eunomia   | All                          | 20.000 - 50.000t | 75.000 - 100 000t    | 95.000 - 150.000t |
| Mepex   | Norway                       | 6.000t           | 38.000t              | 38.000t           |
| Landbell estimations based on catching and farming statistics | EU + Norway, Iceland and UK  | n/a              | n/a                  | 75.000 - 87.500t  |

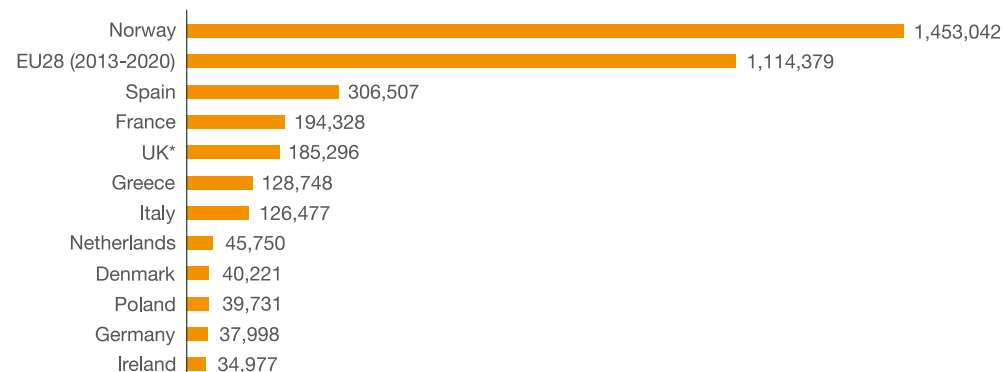
current legal requirements do not provide sufficient incentives for fishermen to return fishing gear to shore for collection and treatment, hence a directive addressing this particular issue is needed.

The main components used for fishing gear production are polyamide, polyethylene and polypropylene, which have a high recycling potential. To tap this potential, separate collection of waste fishing gear and environmentally sound waste management should be ensured.

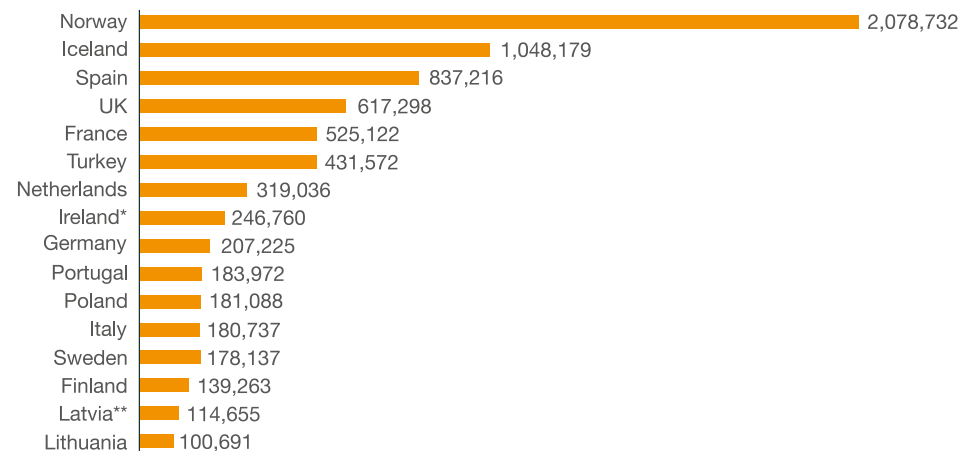
To achieve the above, in line with the SUP Directive, Member States are obliged to implement extended producer responsibility for fishing gear and components of fishing gear containing plastic. This implies the following:

- Starting from 2022, Member States shall monitor fishing gear containing plastic placed on the market of the Member State as well as waste fishing gear containing plastic collected,
- The above data and information will have to be reported to the European Commission within 18 months of the end of the reporting year, meaning EU-wide POM volumes will be known by mid 2024,

Production from aquaculture excluding hatcheries and nurseries for Europe in 2019 (tonnes)



Total annual catch of fishery products by European countries by weight in 2019 (tonnes)





- Member States shall ensure that extended responsibility schemes are established for fishing gear containing plastic by 31 December 2024,
- In line with extended responsibility scheme concept, producers of fishing gear containing plastic will have to cover the costs of separate collection of waste fishing gear containing plastic, its subsequent transport and treatment. Importantly, fishermen and artisanal makers of fishing gear containing plastic will not be considered as producers,
- The producers will also cover the costs of awareness raising measures,
- Member States having marine waters will have to set minimum annual collection rate of waste fishing gear containing plastic for recycling (no clear deadline set),
- The Commission will propose, if appropriate, binding quantitative consumption reduction targets and binding collection rates for waste fishing gear by 3 July 2027,
- The Commission wants to establish harmonised specifications for the marking of fishing gear.

Landbell Group, operating 32 extended producer responsibility schemes in 14 countries, is looking at these developments with a great interest.



Article written by Aneta Zych



We would like to introduce our  
Membership Compliance Manager  
**Stuart Hill** in this newsletter.

**Q How long have you been with ERP UK?**

**A** Almost 4 months now...

**Q Tell us about your experience before joining the ERP team?**

**A** I've been working in the Environmental Compliance and Waste industry for almost 20 years. I previously worked for 3 other organisations in the same sector, including DHL Envirosolutions.

**Q What does a typical day look like for you?**

**A** There really is no such thing! The cyclical nature of the compliance business brings various Environment Agency deadlines to the forefront throughout the year. Planning and meeting these deadlines is of the utmost importance. These involve 30min team meetings every week followed by more detailed monthly meetings helping keep the team focused on their workload and priorities. There is daily interaction with both customers and the team. I try to ensure there is no interference while on calls/video calls (so that I can focus entirely on the call and not be distracted by having to respond to e-mails). I keep windows open during the day for responding to e-mails and playing catch-up.

**Q What motivates you in your role?**

**A** On a daily basis, providing the best possible support to both customers and colleagues in an efficient and timely manner. On a weekly/monthly basis, I aim to make improvements to processes, encourage and develop the team while developing my own skillset as much as possible.

My motivation in my role is knowing I am contributing to an organisation playing a key

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circular economy innovators



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# Meet the team

and active role in ensuring that businesses ultimately takes responsibility for recycling waste that they are producing.

- It is difficult explaining “Producer Responsibility Regulations” to people outside the sector who want to know what I do for a living. Knowing the final outcome is that
- ▲ more recycling is being achieved gives me the satisfaction and motivation I need in my professional and personal approach. My objectives is talking about an issue and then actively doing something positive.

**Q In your opinion how does ERP stand out in comparison to other Producer Compliance Schemes?**

- A** ERP's USP (Unique Selling Point) compared with its competitors is the ability to provide Pan-European/Global Compliance via the Landbell Group. Operating the 3 Producer Compliance Schemes (WEEE, Batteries, Packaging) in the UK gives ERP a significant advantage over its competitors.

Combine this with our Data Service it gives ERP UK a significant advantage in the sector. Add this with the capabilities across the wider group, (across Europe and the rest of the world). This is a unique position

- ▲ to be in as it offers a suite of solutions to customers that I makes us unique in sector.

**Q What do you enjoy doing outside work?**

- A** Anything involving sport or music, usually combined with socialising with family and friends.

**Q Your favourite band / football team?**

- A** Has to be the Foo Fighters! I'm also a lifelong Man. Utd supporter, and a season ticket holder (before the accusations of “glory hunting” are thrown in my direction!).

**Q Favourite holiday destination?**

- A** Canada. Beautiful country. Plenty of pristine places to visit. And Canadian people are generally polite, welcoming, and more relaxed about life in general.

**ERP** supporting the fight against human trafficking



## Anti-Slavery Week 2021

18th-24th October 2021



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LARAC England (2021) – Conference  
& Dinner

# LARAC

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will run as a hybrid event

# CIWM

## Resourcing the Future Conference

Thriving in the 'age of acceleration':  
keeping pace with technological  
environmental and political change

20-21 October 2021  
One Great George Street, London

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Recycling and Waste Management

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May 2022  
THE LANDMARK, LONDON

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**ATF** Approved Authorised Treatment Facility (for WEEE)

**ABE** Approved Battery Exporter

**ABTO** Approved Battery Treatment Operator

**AE** Accredited Exporter (for Packaging)

**AR** Accredited Reprocessor (for Packaging)

**ATF** Authorised Treatment Facility (for WEEE)

**BFR** Brominated Flame Retardants

**CA** site Civic Amenity (see also HWRC)

**CIO** Consumer Information Obligation (for Packaging)

**CIWM** Chartered Institution of Wastes Management

**CSR** Corporate Social Responsibility

**DCF** Designated Collection Facility (for WEEE)

**DEFRA** Department for Environment, Food and Rural Affairs

**DRS** Deposit Return Scheme

**DOENI** Department for the Environment Northern Ireland

**DTS** Distributor Takeback Scheme (for WEEE)

**EA** Environment Agency (see also SEPA, NRW and NIEA)

**EEA** European Environment Agency

**EFW** Energy from Waste

**ELV** End of Life Vehicles

**EMS** Environmental Management System

**EPR** Extended Producer Responsibility

**ESA** Environmental Services Association

**HDPE** High Density Polyethylene

**HWRC** Household Waste Recycling Centre

**LA** Local Authority

**LARAC** Local Authority Recycling Advisory Committee

**MRF** Materials Recovery Facility

**MSW** Municipal Solid Waste

**NIEA** Northern Ireland Environment Agency

**NPWD** National Packaging Waste Database (Batteries & Packaging)

**NRW** Natural Resources Wales

**ODS** Ozone Depleting Substance

**PCB** Polychlorinated Biphenyl

**PCB** Printed Circuit Board

**PERN** Packaging Waste Export Recovery Note

**PP** Polypropylene

**PPT** Plastic Packaging Tax

**PRN** Packaging Waste Recovery Note

**PRO** Producer Responsibility Organisation

**PS** Polystyrene

**PS** Polystyrene

**PVC** Polyvinyl chloride

**RCV** Refuse Collection Vehicle

**ROHS** Restriction Of Hazardous Substances (in EEE)

**SEPA** Scottish Environment Protection Agency

**WAC** Waste Acceptance Criteria

**WBA** Waste Batteries and Accumulators

**WCA** Waste Collection Authority

**WDA** Waste Disposal Authority

**WEEE** Waste Electrical and Electronic Equipment

**WFD** Waste Framework Directive

**WBA Regulations** means The Waste Batteries and Accumulators Regulations 2009 (SI 2009/890);

**WEEE Regulations** means the Waste Electrical and Electronic Equipment Regulations 2013 (SI 2013/3113); and

**Packaging Regulations means** The Producer Responsibility Obligations (Packaging Waste) Regulations 2017 (SI 2007/871)

Get in touch

**Please get in touch** – we'd love to hear from you!

**For general enquiries:**

Phone: +44 203 142 6452

Email: [uk@erp-recycling.org](mailto:uk@erp-recycling.org)

**For our WEEE, Batteries and Packaging Compliance Schemes:**

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**For Data Services:**

Phone: +44 844 2480672

Email: [ukdataservices@erp-recycling.org](mailto:ukdataservices@erp-recycling.org)

**For International Compliance:**

Contact: Rupert Foxall, EU Services Manager Call: +44 (0) 7825 119437

Email: [rupert.foxall@erp-recycling.org](mailto:rupert.foxall@erp-recycling.org)

