



INTRODUCTION

In order to comply to the UK WEEE Regulations of 2012, 'Producers' of new Electrical Products are obligated to provide funding towards the costs of Recycling the goods that their new products have displaced.

A 'Producer' can be the manufacturer, importer or own brand seller of new goods. Generally speaking, a 'Producer' is often recognised to be the first UK business that raises a VAT' invoice for goods placed onto the UK market (the beginning of a chain of supply)

In the case of B2C goods (Business to consumer), the 'Producers' are targeted by weight on how much WEEE they must fund based upon their market share and obligations as calculated by the Environment Agency.

The practical way in which this works is that Producer Compliance schemes that represent Producers and manage their obligations with them, purchase 'evidence notes' of compliant recycling that has been performed at approved sites and has been certified as such through an 'AATF' (authorised, approved, treatment facility) for WEEE recycling. AATF's will post evidence onto the WEEE settlement center in favour of a nominated PCS (Producer Compliance scheme) and these will be sold to Producers that require them.

An AATF can create evidence notes on its own activities but can also provide an umbrella agreement for either ATF's or T11 holders as their activities are also recognised as a compliant way to generate evidence of WEEE Recycling & Reuse, subject to a number of conditions.

WHAT WILL THREE PIN EVIDENCE PROVIDE?

Three Pin Evidence will provide an approved AATF that will be able to support ATF's and T11's with full guidance on generating the necessary paperwork and systems to be entitled to earn payments from their qualifying B2C recycling activities.

Three Pin Evidence has been authorised by a Producer Compliance scheme to provide evidence of Recycling required by its Producer members and will provide funding in return for the provision of evidence notes in their name.

Three Pin Evidence can also facilitate an evidence trading arrangement with its chosen Producer Compliance scheme on behalf of AATF's that may wish to secure evidence funding on some or all of their qualifying B2C recycling.

Three Pin Evidence can offer telephone, e-mail or on-site support to potential trade partners as well as support in auditing activities relating to the generation of evidence to validate the payments made.

Three Pin Evidence are keen to create a network of partners that cumulatively represent a significant volume of evidence that will enable all partners to secure the best market rates for evidence generated as a result of their combined activities.



WHAT MUST A T11 OR ATF PROVIDE FOR EVIDENCE?

In order to secure funding, T11's and ATF's need to be able to demonstrate that they have the necessary systems and processes in place to capture and record appropriate Data.

These include:

- 1) Recognising and separating WEEE upon receipt, that is B2C and qualifies for funding. Guidance on how to recognise qualifying WEEE upon which evidence funding is available will be provided by Three Pin Evidence
- 2) Recording weight information by each category of B2C WEEE received for reporting purposes. Ideally this will be actual weights, but protocols may be acceptable under certain circumstances, but these would need to be agreed prior to submission of any reports
- 3) In the case of Recycling, be able to demonstrate that the downstream recyclers used are able to confirm that the recycling efficiencies achieved are acceptable to the Environment Agency. This is normally achieved by using only EA approved recyclers. The Recycling efficiencies are set by the Environment Agency and are subject to review by them periodically. Guidance is available on validating this key area of compliance through Three Pin Evidence.
- 4) In the case of T11's, reuse of B2C WEEE that the standards of testing and performance of reuse items meets the requirements for safety and functionality. These will be discussed and agreed prior to the evidence trading agreement commencing.

Upon request, the T11 or ATF will be required to be audited to confirm that all of the points above are being complied with by the AATF that will be providing the Umbrella agreement. Auditing is carried out by the AATF for which the evidence is being written and for whom responsibility lies for the compliant reporting to both the EA and the Producer Compliance Scheme that is funding the purchasing of evidence being generated.

WHAT AGREEMENTS WILL BE IN PLACE?

The term of the agreement will be for a single compliance year.

This is required because each PCS has an annual target and in order for them to operate compliantly, they need to secure sufficient evidence for their members which they achieve by securing this evidence from their chosen AATF's.

An exclusive evidence purchasing agreement will be in place from Three Pin Evidence to either their T11, ATF or AATF partners which provides guaranteed funding on B2C recycling/reuse carried out on agreed categories and declared volumes.

In order to Protect all partners, Three Pin Evidence will sign both Non-Disclosure and Non-Competition agreements with all partners and will undertake to ensure that all parties operate in a way that only enhances trading relations and adds mutual value.