

# Guidance Notes

on the

Producer Responsibility Obligations  
of the Waste Electrical and Electronic Equipment  
(WEEE) Regulations 2013

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## INTRODUCTION

The Waste Electrical and Electronic Equipment (WEEE) Regulations 2013 were taken enforcement from 1<sup>st</sup> January 2014, with the aim of reducing the red tape of WEEE system and including the changes from EU WEEE recast. The Regulations require **producers** to finance the collection, treatment and recycling or reuse of this fastest growing waste streams.

## PRODUCERS

A Producer is classed as any company who:

- a) Manufacturing EEE – manufactures EEE under his own name or trademark, or has EEE designed or manufactured and markets it under his own name or trademark within the territory of that Member State;
- b) Re-branding EEE - resells within the territory of that Member State, under his own name or trademark, equipment produced by other suppliers, a reseller not being regarded as the “producer” if the brand of the producer appears on the equipment, as provided for in sub-paragraph (a)
- c) Importing – sells EEE which is from a third country or from another Member State
- d) Selling EEE by means of distance communication directly to private households or to users other than private households in a Member State, and is established in another Member State or in a third country

Any company who undertakes any of the above activities is classed as a Producer regardless of company size or selling technique. Producers may be Companies registered with Companies House, Partnerships, Sole Traders or Foreign manufacturers. Group registrations are not permitted and each subsidiary of a Company must register as a separate Producer.

If a company sells EEE via distance selling methods into the UK but has no establishment in the UK, he should assign an authorised representative for registration.

## PRODUCTS OBLIGATION

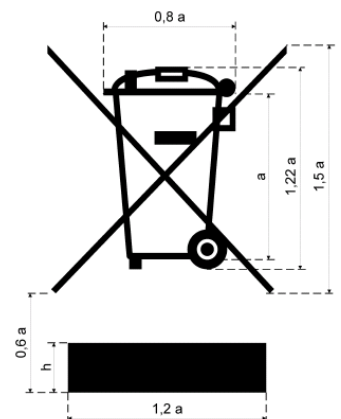
All new EEE placed onto the market after 15 August 2005 must be marked with:

The crossed out wheeled bin symbol with a date mark (usually the solid black bar underneath the bin).

All marks should be placed on the EEE product in a visible, legible and indelible form. However, where this is not possible the marks should be printed on either of the following:-

- The fixed supply cord (if there is one on the product)
- The instructions or warranty of the product
- The product packaging

Producers are also required to make product information available to operators of treatment and reprocessing facilities if they request.



## TYPE OF PRODUCER

1. **Business to Business EEE Producer (B2B):** It means EEE is intended for use by non-household end users (e.g. commercial, industrial or professional purposes)
2. **Business to Consumer EEE Producer (B2C):** It means EEE is intended for use by household end users

As some EEE can be for **dual use** (such as laptops, etc.), in order to support a claim that EEE is in fact for non-household use, Producers are required to review their individual EEE, according to the dual use guidance (<https://www.gov.uk/business-to-consumer-b2c-and-business-to-business-b2b-eee-and-weee-how-to-correctly-identify>) , and identifying products into the correct obligation. There must be also roof evidence(s) to support your assessment.

## REGISTRATION & DATA REQUIREMENTS B2C PRODUCERS

### Registration

#### **1. Small Producers with 5 tonnes De Minimis**

Producers with less than or equal to 5 tonnes of EEE placed onto UK market in any one compliance year are classes as small producers.

Small producers are given choices to either registering directly with the appropriated Agency, or join a PCS with financing obligation of B2C WEEE collection, treatment and recycling based on their market share.

- 2. All Producers intending to place or having placed more than 5 tonnes of EEE onto UK market:** must register with a Producer Compliance Scheme (PCS) within 28 days of first placing EEE or forming intention of putting EEE onto the UK market. Transform is an accredited PCS and is able to discharge the obligation of both B2B and/or B2C Producers.

Producers are required to register company information and pay the relevant fee associated with their registration. Once this information has been provided and verified Transform will then submit the registration to the Environment Agency. The Environment Agency will then issue a Producer Registration Number (PRN), which is unique to your company and will only change should the legal entity change.

It is required for producers to provide the Producer Registration Number (PRN) to distributors. This can be incorporated into letterheads, or provided in writing by other means when EEE is transferred.

**Re-registration for existing members with Transform is required by the legal deadline of 15 November each year and Transform will register your company with the Environment Agency by the legal deadline of 30 November.**

At the end of each quarter of a calendar year, EEE producers must provide details of the amount of EEE that they have placed onto the UK market during that quarter. Transform will provide this information to the Environment Agency.

### EEE data required level of accuracy

EEE data supplied by the members is required to be 'as accurate as reasonably possible'. This means that the Agency will be looking for your data to be obtained by actual weighing, sample weighing and building weight records rather than from estimates and assumptions.

Producers should assess each item of EEE to ensure that it is in scope of the Regulations with the proper category to ensure accuracy in data reporting.

Members are required to submit weights, in metric tonnes to 3 decimal places, for all EEE products placed onto the UK market, by category. Data should be submitted on the weight of the item as a whole product, as it is placed on the market (as this will be how it is disposed of by the end-user at its end of life).

The weight should exclude all batteries, packaging, instructions and warranty documents.

## Record keeping

All Producers are required under the Regulations to ensure all records of registration and data collations along with any supporting documents showing how the submission was calculated are maintained for at least four years.

## B2C Financing Obligation

B2C members are required to finance the costs of collection, treatment, recovery and environmentally sound disposal of household WEEE delivered to Designated Collection Facilities (DCFs) or returned to WEEE Producer Compliance Schemes by distributors and/or re-use organisations.

Transform arrange for the collection, treatment, recovery and environmentally sound disposal of each of its producer members' allocated market share of WEEE to meet the national target. The costs to do this are then passed back to the producer.

**It is important to be aware that the figures used to calculate the market share aren't finalised until after the end of the compliance year. Therefore, the obligation for Transform quarterly invoice is based on Member's quarterly obligation throughout the past four quarters. Once the final obligation is established a reconciliation invoice or credit is issued.**

## **REGISTRATION & DATA REQUIREMENTS B2B PRODUCERS**

### Registration

#### **1. Small Producers with 5 tonnes De Minimis**

Producers with less than or equal to 5 tonnes of EEE placed onto UK market in any one compliance year are classes as small producers.

Small producers are given choices to either registering directly with the appropriated Agency, or join a PCS.

#### **2. All Producers intending to place or placed more than 5 tonnes of EEE onto UK market:** must register with a Producer Compliance Scheme (PCS) within 28 days of first placing EEE or forming intention of putting EEE onto the UK market. Transform is an accredited PCS and is able to discharge the obligation of both B2B and/or B2C Producers.

Producers are required to register company information and pay the relevant fee associated with their registration. Once this information has been provided and verified Transform will then submit the registration to the Environment Agency. The Environment Agency will then issue a Producer Registration Number (PRN), which is unique to your company and will only change should the legal entity change.

It is required to provide the Producer Registration Number (PRN) to distributors. This can be incorporated into letterheads, or provided in writing by other means when EEE is transferred.

**Re-registration for existing members with Transform is required by the legal deadline of 15 November each year and Transform will register your company with the Environment Agency by the legal deadline of 30 November.**

At the end of each quarter of a calendar year, EEE producers must provide details of the amount of EEE that they have placed onto the UK market during that quarter. Transform will provide this information to the Environment Agency.

### **EEE data required level of accuracy**

EEE data supplied is required to be 'as accurate as reasonably possible'. This means that the Agency will be looking for your data to be obtained by sample weighing and building weight records rather than from estimates and assumptions. Producers should assess each item of EEE to ensure that it is in scope of the Regulations with the proper category to ensure accuracy in data reporting.

Members are required to submit weights, in metric tonnes to 3 decimal places, for all EEE products placed onto the UK market, by category. Data should be submitted on the weight of the item as a whole product, as it is placed on the market, as this will be how it is disposed of by the end-user at its end of life.

The weight should exclude all packaging, instructions and warranty of the product and the weight of batteries built-into or supplied with the product.

### **Record keeping**

All Producers are required under the Regulations to ensure all records of registration and data collations along with any supporting documents showing how the submission was calculated are maintained for at least four years, this is a legal requirement.

### **B2B Financing Obligation**

B2B members are required to finance the costs of collection, treatment, recovery and environmentally sound disposal of -

- a) WEEE was placed on the UK market on or after 13 August by the producer (The relevant WEEE); or
- b) WEEE was placed on the market in the United Kingdom before 13 August but the producer is supplying new EEE that—
  - o is intended to replace the relevant WEEE, and
  - o is of an equivalent type or is fulfilling the same function as the relevant WEEE

However, nothing will prevent a B2B producer from concluding an agreement with end users to make alternative arrangements between themselves to finance the costs of the collection, treatment, recovery and environmentally sound disposal of WEEE.

## **DISTRIBUTOR OBLIGATIONS**

Distributors, including retailers, wholesalers, and internet, mail order and telesales are classed as any company who supplies EEE to the household end users. Distributors obligation include

1. Make information regarding the environmental impacts of EEE/WEEE and the separate collection of household WEEE in writing on their premises, websites and/or catalogues
2. Provide free take-back like-for like household WEEE: distributors must ensure that consumers are aware of the separate collection facilities available for their WEEE; one option is to offer free take back when they buy a new electrical or electronic product. Transform can help you offer in store take back by providing you with the signage, storage container and the documentation to ensure you are fully compliant in this area.
3. A distributor who supplies new EEE from a retail premise with a sales area relating to EEE of at least 400m<sup>2</sup>, to take back very small WEEE.
  - a) This must be free of charge to end users and with no obligation to buy EEE of an equivalent type.

- b) The collection of very small WEEE must be at the retail premises or in its immediate proximity. “Very small WEEE” means items with no external dimension (i.e. height, depth, length) more than 25cm. The diameter should be taken as the dimension of spherical products.

**Recycle your old electricals here for free!**

**Transform**

**Please do not throw electrical equipment, including those marked with this symbol, in your bin.**

Unwanted electrical equipment is the UK's fastest growing type of waste. Many electrical items can be repaired or recycled, saving natural resources and the environment. If you do not recycle electrical items they will end up in landfill where hazardous substances will leak out and cause soil and water contamination – harming wildlife and also human health. If you're buying a new electrical item, we will take back and recycle your old item on a like for like basis in our store **for free**. Unwanted items should be returned within 28 days of purchasing your new product. Please present your receipt as proof of purchase. **Simply hand your unwanted electrical items to a member of staff.**

**Delivering more**

**Biffa**



## WHAT EEE HAS TO BE COUNTED?

Under the WEEE Regulations EEE is defined as:

*“equipment which is dependent on electric currents or electromagnetic fields in order to work properly and equipment for the generation, transfer and measurement of such currents and fields falling under the categories set out in Schedule 1 to these Regulations and designed for use with a voltage rating not exceeding 1,000 volts for alternating current and 1,500 volts for direct current”*

All EEE products within the scope of the regulations (see Scope Guidance link from GOV.UK: <https://www.gov.uk/government/publications/eee-producers-how-to-accurately-identify-eee>) fall into one of the categories listed below, regardless of whether they are designed for use by householders or non-householders. The first two categories include ‘household’ in the title, but similar products used or designed for non-household use should still be reported in these categories (e.g. a washing machine designed to be used in a launderette or industrial laundry should still be reported in category 1). Further guidance on the type of products included in each category is listed in appendix 1.

The Regulations requires producers to report EEE placed on the market in all the ten basic categories (set out in the Directive) with display equipment, cooling appliances containing refrigerants, gas discharge lamps/LED light sources and photovoltaic panels being reported separately.

Producers placing washing machines and fridges on the market in category 1 would therefore report these sales separately, and have separate obligations for `large household appliances` and `cooling appliances containing refrigerants`. Producers of televisions are responsible for both older equipment based on cathode ray tubes (CRT), and more modern sets using LCD/LED or plasma displays.

|                       |  |                                   |
|-----------------------|--|-----------------------------------|
| <u>EEE Categories</u> | Category 1                                 | Large Household Appliances        |
|                       | Category 2                                 | Small Household Appliances        |
|                       | Category 3                                 | IT & Telecommunications Equipment |
|                       | Category 4                                 | Consumer Equipment                |
|                       | Category 5                                 | Lighting Equipment                |
|                       | Category 6                                 | Tools                             |
|                       | Category 7                                 | Toys, Leisure & Sports Equipment  |
|                       | Category 8                                 | Medical Devices                   |
|                       | Category 9                                 | Monitoring & Control Instruments  |
|                       | Category 10                                | Automatic Dispensers              |
|                       | Display Equipment                          |                                   |
|                       | Cooling Appliances Containing Refrigerants |                                   |
|                       | Gas Discharge Lamps and LED Light Sources  |                                   |
|                       | Photovoltaic Panels                        |                                   |

Producers are responsible for assessing and determining if a product is obligated (in scope) of the Regulations. Generally, there are very few electrical products that are not covered by the Regulations, but if there is a genuine reason for believing that it should not be covered, guidance from Transform should be sought.

Refer to Appendix 2 for a copy of the `decision tree` produced by the Department for Business Innovation & Skills (BIS) which can be used to decide whether or not a product falls within scope of the regulations.

## EXEMPTIONS FROM THE WEEE REGULATIONS

There are a number of product exemptions included in the WEEE Regulations. These are:

- equipment designed to be sent into space;
- large-scale stationary tools;
- large-scale fixed installations;
- any EEE constituting a means of transport for persons or goods, excluding electric two
- wheeled vehicles which are not type-approved;
- non-road mobile machinery made available exclusively for professional use;
- equipment specifically designed solely for the purposes of research and development that is only made available on a business-to-business basis;
- medical devices and in vitro diagnostic devices, where such devices are expected to be infective prior to end of life, and active implantable medical devices.
- 

## WHAT IS TRANSFORM'S ROLE?

Transform assumes legal liability for ensuring that their members are compliant with the regulations. However, members still retain responsibility for ensuring that the information that they submit to the scheme is correct.



#### Membership Services:

- Registers members as Producers with the relevant Environment Agency;
- Provides members with their PRN and Certificate of Registration;
- Provides advice and guidance from Compliance Specialists;
- Provides regulatory and EA updates;
- Provides a comprehensive online data submission system or the option to complete paper-based forms;
- Reports information on the amount of EEE placed onto the UK market, by category and obligation type, for each member;
- Verifies of all information submitted to Transform prior to submission to the Environment Agency;
- Takes responsibility for ensuring that enough evidence is obtained to meet the obligation of all B2C members at competitive rates;
- Undertakes regular compliance monitoring visits;
- Provides cost-effective WEEE collection and treatment arrangements



## weee compliance

### ENFORCEMENT

The Regulations, in relation to Producer obligations, are enforced in England by the Environment Agency (EA), in Wales by Natural Resources Wales (NRW), in Scotland by the Scottish Environmental Protection Agency (SEPA) and in Northern Ireland by the Northern Ireland Environment Agency (NIEA). Their role includes:

- Approving, registering and monitoring PCSs, AATFs and AEs;
- Managing data on market share, WEEE collection, treatment and reprocessing;
- Ensuring Producers are registered, providing accurate information and complying with their legal obligations;
- Maintaining a Public Register of Producers and lists of Approved PCSs, AATFs and AEs;
- Providing advice and guidance on the interpretation of the Regulations;
- Identifying non-compliant companies (Freeriders) and ensuring their compliance.

The Vehicle Certification Agency (VCA) is an executive agency of the Department of Transport and is responsible for enforcing:

- EEE Distributor responsibilities and ensuring that Distributors play their part in helping B2C users to dispose of WEEE
- Producer obligations relating to the marking of EEE with the crossed out wheeled bin symbol

### GLOSSARY

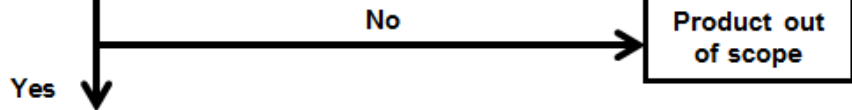
Under these regulations you will find that a significant number of acronyms are used. Some of the common ones that you will come across are below:

|         |  |
|---------|--|
| AATF    | Authorised Approved Treatment Facility   |
| AE      | Approved Exporters   |
| B2B     | EEE is intended for use by non-household end users/ WEEE from users other than from private households |
| B2C     | EEE is intended for use by household end users / WEEE from private households                          |
| BIS     | The Department for Business Innovation & Skills  |
| CA Site | Civic Amenity Site (Household Waste Recycling Centre)  |
| CRT     | Cathode Ray Tube   |
| DCF     | Designated Collection Facility   |
| DEFRA   | Department for Environment & Rural Affairs   |
| DoC     | Declaration of Compliance  |
| DTS     | Distributor Take-back Scheme   |
| EA      | Environment Agency   |
| EEE     | Electrical & Electronic Equipment  |
| LHA     | Large Household Appliances (Category 1)  |
| NIEA    | Northern Ireland Environment Agency  |
| NRBW    | Natural Resources Body for Wales   |
| PCS     | Producer Compliance Scheme   |
| PRN     | Producer Registration Number   |
| RoHS    | Restriction of Hazardous Substances  |
| SC      | Settlement Centre  |
| SEPA    | Scottish Environment Protection Agency   |
| WEEE    | Waste Electrical & Electronic Equipment  |

**APPENDIX 1 – DECISION TREE**

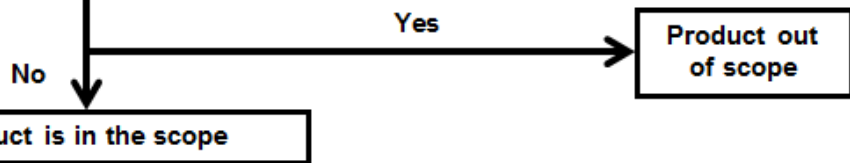
**Is the equipment in the scope of the WEEE recast Directive?**

1. designed for use with a voltage rating not exceeding 1,000V for alternating current and 1,500V for direct current.
2. dependent on electric currents or electromagnetic fields in order to work properly
3. equipment for the generation of such currents, or
4. equipment for the transfer of such currents, or
5. equipment for the measurement of such currents.



**Excluded due to exclusion criteria of the WEEE recast Directive?**

- A. Military and security:
  1. Equipment which is necessary for the protection of the essential interests of the security of Member States;
  2. Including arms, munitions and war material intended for specifically military purposes.
- B. Equipment which is specifically designed and installed as part of another type of equipment that is excluded from or does not fall within the scope of this Directive, which can fulfil its function only if it is part of that equipment.
- C. Filament bulbs.
- D. Equipment designed to be sent into space.
- E. Large-scale stationary industrial tools.
- F. Large-scale fixed installations, except any equipment which is not specifically designed and installed as part of these installations.
- G. Means of transport for persons or goods, excluding electric two-wheel vehicles which are not type-approved.
- H. Non-road mobile machinery made available exclusively for professional use.
- I. Equipment specifically designed solely for the purposes of research and development that is only made available on a business to business basis.
- J. Medical instruments:
  1. Medical devices that are expected to become infective prior to end of life.
  2. In vitro diagnostic medical devices, that are expected to become infective prior to end of life.
  3. Active implantable medical devices.



## APPENDIX 2 – CATEGORY LISTS

### List of products from Schedule 2 of the WEEE Regulations

#### 1. Large Household Appliances

Washing machines  
Clothes dryers  
Dish washing machines

Cooking  
Electric stoves  
Other fanning, exhaust ventilation & conditioning equipment  
Other large appliances used for cooking & other processing of food

Electric heating appliances  
Electric radiators  
Other large appliances for heating rooms, beds, seating furniture  
Electric fans  
Air conditioner appliances  
Electric hot plates  
Microwaves

#### 2. Small Household Appliances

Vacuum cleaners  
Carpet sweepers  
Other appliances for cleaning  
  
Appliances used for sewing, knitting, weaving & other processing for textiles  
  
Irons & other appliances for ironing, mangling & other care of clothing  
Grinders, coffee machines & equipment for opening or sealing containers or packages

Toasters  
Fryers  
Appliances for hair-cutting, hair drying, tooth brushing, shaving, massage & other body care appliances  
Clocks, watches & equipment for the purpose of measuring, indicating or registering time  
Scales  
Electric knives

#### 3. IT & Telecommunications Equipment

Centralised data processing:  
Mainframes  
Minicomputers  
  
Notebook computers  
  
Notepad computers  
Printers  
Copying equipment  
Electrical & electronic typewriters  
Pocket & desk calculators  
  
Other products & equipment for the collection, storage, processing, presentation or communication of information by electronic means  
User terminals & systems

Printer units  
Personal computing:  
Personal computers (CPU, mouse, screen & keyboard included)  
Laptop computers (CPU, mouse, screen & keyboard included)  
Pay telephones  
Cordless telephones  
Cellular telephones  
Answering systems  
Other products or equipment of transmitting sound, images or other information by telecommunications  
Telex/ fax  
  
Telephones

#### 4. Consumer Equipment

Radio sets  
Television sets  
Video cameras  
Other products or equipment for the purpose of recording or reproducing sound or images, including signals or other technologies for the distribution of sound & image than by telecommunications

Hi-fi recorders  
Audio amplifiers  
Musical instruments  
Video recorders

**5. Lighting Equipment (mainly for luminaries)**

Luminaires for fluorescent lamps with the exception of luminaires in households

Low pressure sodium lamps

High intensity discharge lamps, including pressure sodium lamps & metal halide lamps

Other lighting or equipment for the purpose of spreading or controlling light with the exception of filament bulbs

**6. Tools**

Drills

Tools for welding, soldering or similar use

Saws

Equipment for spraying, spreading, dispersing or other treatment of liquid or gaseous substances by other means  
Tools for mowing or other gardening activities

Sewing machines

Equipment for turning, milling, sanding, grinding, sawing, cutting, shearing, drilling, making holes, punching, folding, bending or similar processing of wood, metal & other materials

Tools for riveting, nailing or screwing or removing rivets, nails, screws or similar uses

**7. Toys, Leisure & Sports Equipment**

Electric trains or car racing sets

Computers for biking, diving, running & rowing

Hand-held video game consoles

Sports equipment with electric or electronic components

Video games

Coin slot machines

**8. Medical Devices**

Radiotherapy equipment

Laboratory equipment for in-vitro diagnosis

Cardiology

Analysers

Dialysis

Freezers

Pulmonary ventilators

Fertilization tests

Other appliances for detecting, preventing, monitoring, treating, alleviating illness, injury or disability

Nuclear medicine

**9. Monitoring & Control Instruments**

Smoke detector

Heating regulators

Measuring, weighing or adjusting appliances for household or laboratory equipment

Thermostats

Other monitoring & control instruments used in industrial installations (for example, in control panels)

**10. Automatic Dispensers**

Automatic dispensers for hot drinks

Automatic dispensers for money

Automatic dispensers for hot or cold bottles or cans

All appliances which deliver automatically all kind of products

Automatic dispensers for solid products

**11. Displays (televisions and monitors)**

Personal computer screens

Television sets

**12. Cooling equipment containing refrigerants**

Large cooling appliances

Freezers

Refrigerators

Other large appliances used for refrigeration, conservation & storage of food

**13. Gas discharge lamps and LED Light Sources**

Straight fluorescent lamps

Compact fluorescent lamps

LED light sources

LED bulbs

**14. Photovoltaic Panels**

## APPENDIX 3 – ENVIRONMENT AGENCY SCOPE GUIDANCE

The following table sets out how we have interpreted the Regulations for a number of products we have been asked about. These products are not listed specifically under schedule 2 of the WEEE Regulations. The purpose of listing these interpretations here is to provide some examples which underpin the decision tree and help illustrate the principles of determining what is covered by the regulations and what is not, but the advice cannot be considered to be legally binding and we reserve the right to change it if circumstances and our understanding changes.

### List of previous agency advice

| Product   | In or out?          | Category       | Comments   |
|---|---------------------|----------------|--|
| Air conditioning  | In<br>(see comment) | Category 1     | Portable air conditioning units are covered.<br>Units that are placed on the market as single items, even if they are vented through a wall are also covered.<br>Large air conditioning systems that consist of several units, ducts, piping and fans would be considered as fixed installations and out of scope.   |
| Air curtains  | in                  | Category 1     |  |
| Air filtering & extracting systems  | In                  | Category 6     | Portable units are covered.<br>Units that are placed on the market as single items, even if they are vented through a wall are also covered. Large scale air filtration and extractions systems that consist of several units, ducts, piping and filters would be considered as fixed installations and out of scope.  |
| Air fresheners, perfume sprayers (the 'plug-in' or battery types)                       | In                  | Category 2     |  |
| Aerials, Antennas & Digital TV dishes   | In                  | Category 4     | See section 3 page 9 on ancillary parts  |
| Battery chargers  | In                  | See comment    | The charger should be in the same category as the item that it charges (for example, a mobile-phone battery charger would be in category 3, while a camera battery charger would be in category 4). General battery chargers should be included in category 2  |
| Blood glucose meters / testers  | In                  | Category 8     |  |
| Cable reel  | Out                 |                | Reels of cable are out of scope because they cannot function in their own right.   |
| Car-park & traffic management electric barriers   | In                  | Category 9     |  |
| Car diagnostic equipment  | In                  | Category 3     | Equipment that is plugged into the car's central processing unit to diagnose & record faults depends on electricity to work, & so is classed as equipment that is used to process information electronically   |
| Chip & PIN credit or debit cards  | Out                 |                | The card itself is considered out of scope but the card reader would be in scope (category 3)  |
| Cooker hood   | In                  | Category 1     | If it has a built in LED lamp it is still category 1 because the basic function is as an extractor fan not as a light source.  |
| Decorative lights, festive lights, lava lamps, fibre-optic lights, night lights & so on | Out                 | Does not apply | All household light fittings are exempt from the regulations. However, they are not exempt from the RoHS regulations   |
| Display equipment   | In                  | Category 11    | All display equipment (including CRT TVs, plasma screens, LCDs & so on) should be declared as category 11 – display equipment. TVs should not be included in category 4 & computer screens should not be included in category 3. Display screens that are a vital part of another product (for example, laptop screens, mobile-phone screens & mp3 player screens) should be declared in the category for the relevant equipment – laptops (category 3), mobile phones (category 3), mp3 players (category 4) & so on. |
| Disposable cameras  | In                  | Category 4     | Disposable cameras that are recycled should be declared as non-household EEE. Such cameras are normally returned to a film processor, who will either recycle the camera or discard it   |
| Duty Free   | In                  |                | Whilst the goods may leave the UK once they are sold - because the end-user is travelling - the goods were still supplied to be put on the UK market (e.g. to British Airways or another duty free operator)   |
| E-cigarettes  | in                  | Category 7     |  |
| Electric Showers  | In                  | Category 2     | Electric showers are in scope, as they are single discreet items added to the electric and water system of a house. Pumps supplied as part of a shower package would also be in scope.   |
| Extension cords, multi-terminals, adaptors & leads                                      | In                  | Category 2     | If these products are not sold in relation to a specific product, they should be declared as category 2  |
| Electric fences   | In                  | Category 6     |  |
| Fire-alarm systems  | In                  | Category 9     | Finished products that rely on electricity & form part of a fire-alarm system are included as EEE. This could include smoke detectors, alarm bells, lighting, sprinklers & so on   |

| Product  | In or out?     | Category        | Comments   |
|--|----------------|-----------------|--|
| Fish tanks   | In             | Category 7      | A fish tank that has a built-in light, heater or pump and is sold as a single commercial unit is classed as EEE. The whole weight of the item should be included   |
| Furniture with electrical components   | Out            |                 | Items of home furniture with electrical components (for example, an electric bed, electric chair & so on) are considered not to be covered by the regulations. The main function of the item is 'furniture', which is not a category in the regulations, & the electrical component becomes part of equipment that is not electrical   |
| Fridge   | in             | Category 12     | If it has an LED internal lamp it is still category 12 because its basic function is as an appliance containing refrigerant not as a source of light.  |
| Games consoles   | In             | Category 7      | Included in Category 7 even if they have additional functions such as a DVD player.  |
| Hearing aids   | In             | Category 8      |  |
| In-car entertainment   | In             | Category 4      | Portable DVD players, radios & stereos that rely on a 12-volt power supply & are not permanently installed in the vehicle are covered by the regulations. A car radio that is purchased separately to be permanently installed in a vehicle & wired into the car's electrical system, & likely to remain with the car until it is sold or scrapped, would be considered out of scope |
| Illuminated fire-exit sign   | In             | Category 5      |  |
| LED lamps and modules  | in             | Category 13     | A light source product placed on the market as an individual product which uses light emitting diodes or OLED material as the light source and will be used as a replacement (eg for maintenance or upgrade). Includes household and non-household products.   |
| LED indicator light product  |                |                 | LED indicator light product containing one or more LED indicator light(s) should be reported in its own category.  |
| LED (individual) and LED sub-assemblies  | Out            |                 | If supplied to an original equipment manufacturer (OEM) for incorporation into a finished product they are components so out of scope.   |
| Light Switches   | Out            |                 | Unless they have additional functionality & include active electronics such as a PCB or a circuit breaker. They would then fall within scope & would be in category 2  |
| Loadbanks (testing systems for electric power supplies)  | In             | Category 9      |  |
| Loft ladders with electronic controls  | In             | Category 2      |  |
| Massage chairs & massage appliances  | In             | Category 1 or 2 | Large massage chairs should be included as category 1. Massage pads that fit onto chairs & other massage equipment is category 2   |
| Memory cards, USB sticks, SIM cards  | In             | Category 3      |  |
| Mobility scooters  | Out            |                 | They are vehicles for the transport of people.   |
| Power-supply units   | In             | See comment     | These act as transformers to alter the voltage or current, & so are finished products in their own right. They should be included in the same category as the products they come with (for example, mobile phone, laptop & so on)  |
| Pumps, filters, fountains & so on for garden ponds   | In             | Category 6      |  |
| Remote Controllers   | In See comment |                 | Battery operated remote controls are generally included in scope of the product they are supplied with – such as Category 4 for a TV remote control, Category 7 for remote controllers for toy cars and tanks.   |
| RFID (radio-frequency identification devices) radio tracking devices, including pet ID chips, anti-theft devices & electronic tags for criminals | In             | Category 3      | The only exception is where a RFID is a security feature which forms part of the packaging of a product  |
| Roller screen with electronic winder functions   | In             | Category 2      |  |
| Satellite navigation (sat nav) systems   | In             | Category 3      | Portable 'sat nav' systems are covered. 'Sat nav' systems that are permanently fixed & wired into a vehicle or yacht would be considered part of the vehicle &, as a consequence, are not be covered by the regulations  |
| Security systems including CCTV  | In             | Category 4      | Security systems which include motion sensors, video cameras or still cameras & display equipment & so on are classed as category 4 – equipment for recording or reproducing sound or images   |
| Spa baths, hydrotherapy baths, computerised massage baths  | In             | Category 1      | Although the main function of these items is a bath, a large part of the function & feature of the product is based on the added value provided by the electrical functions  |
| Solar panels   | in             | Category 14     |  |
| Spare parts  | Out            |                 | Spare parts supplied to repair EEE are not covered by the regulations, as they are considered to be components or finished products.<br>Note: spare parts may have to meet RoHS regulations. Producers should make sure their products keep to the requirements  |
| Solar-powered items such as calculators, watches, garden pumps, phone chargers & so on   | In             | See comment     | The category will depend on the product  |
| Stairlifts   | Out            | Does not apply  | Stairlifts & other lifts (for example, escalators) are not in any of the EEE categories & so are considered to be outside the regulations  |

| Product                                | In or out?  | Category       | Comments   |
|--|-------------|----------------|--|
| Street lights                          | In          | Category 5     | The electrical parts are considered EEE, the bulb, wiring, control box, but not the concrete or metal lamp post  |
| Sunbeds                                | In          | See comment    | Sunbeds are classed as category 2 & fluorescent bulbs should be included in category 5   |
| Taps with built-in lights              | Out         | Does not apply | The main function of the item is a tap, & does not need electricity  |
| Torches                                | In          | Category 2     | Both filament bulb & LED torches would fall into Category 2  |
| Traffic lights                         | In          | Category 9     |  |
| Under-floor heating systems            | In          | Category 1     | Only if powered by electricity   |
| Utility meter                          | See comment |                | Digital utility meters are in scope – category 9. Analogue utility meters are out of scope   |
| Water coolers – bottle or mains supply | In          |                | Category 1 or category 12 if it contains substances used for refrigeration   |
| Wind turbines                          | See comment | Category 6     | Large wind turbines would qualify as large-scale industrial tools & so would be exempt from the regulations. Small-scale wind turbines that could be used by a household, smallholding or at the roadside should be included in category 6 |
| Wind-up torches & radios               | In          | See comment    | These still rely on electricity to work, no matter whether the electricity is generated by the wind-up system. The category will depend on the product   |
| Wire reel                              | Out         |                | Reels of wire are out of scope because they cannot function in their own right.  |
| X-ray machines                         | In          | See comment    | Category will depend on its intended use. For instance, X-ray machines used for security in airports are category 9. X-ray machines used in hospitals are category 8.  |



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