



RESPONSIBLE PRINTER CARTRIDGE RECYCLING

ZERO LANDFILL ZERO INCINERATION ZERO WASTE



Find analytical information
to the new WEEE regulatory requirements, your options,
and your possible solution with this quick guide!



ZeroWasteRecycling.co.uk

Unit 1, Fort Road, Wick, Littlehampton, West Sussex, BN17 7QU
01903 368 685 | admin@zerowasterecycling.co.uk



RESPONSIBLE PRINTER CARTRIDGE RECYCLING

ZERO LANDFILL ZERO INCINERATION ZERO WASTE

CONTENT

Pages	Description
03	EEE, WEEE & Printer Cartridges – The definitions & what changed!
04	WEEE legislation & different parties
05	Are you a Producer of EEE? – What are your legal obligations!
06-07	Are you a Dealer/Reseller of EEE? What are your legal obligations!
08-10	How ZWR can be used to meet your free take-back obligations!
11	Quick steps guide – How to access our service
12	Frequently Asked Questions (FAQ)

A SIMPLE AND ANALYTICAL GUIDE!

What your new legal obligations are &
How to easily satisfy them at little or no cost to you
via ZeroWasteRecycling!

EEE, WEEE & PRINTER CARTRIDGES THE DEFINITIONS AND WHAT CHANGED!

Printer cartridges that require electrical currents to work properly are considered to be within scope of the WEEE Regulations 2013 with enforcement in the UK from 1 January 2016.

The UK WEEE Regulations 2013 impact the waste activities of manufacturers, importers, sellers, distributors and users of most types of electrical and electronic equipment, including printer cartridges.

**Basically, any cartridge that has chip or microchip
is now considered as a WEEE item!**

EEE Definition

Article 3 (1) (a) 'electrical and electronic equipment' or '[EEE](#)' means 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 and designed for use with a voltage rating not exceeding 1 000 volts for alternating current and 1 500 volts for direct current.

The WEEE Directive

The European Waste Electrical and Electronic Equipment ([WEEE](#)) Directive has been transposed to United Kingdom legislation through [The Waste Electrical and Electronic Regulations 2013](#). The Regulations came into effect on 1 January 2014 and **printer cartridges come within scope of the Regulations from 1 January 2016**.

The Waste Electrical and Electronic Equipment Directive aims to:

- Reduce the waste from electrical and electronic equipment
- Increase recovery and recycling rates of WEEE
- Improve environmental performance of all operators involved in the life cycle of EEE
- It places obligations on 'producers' and 'distributors'.

WEEE & Printer Cartridges

"A printer cartridge falls within the scope of the Directive if it meets the definition of EEE given in Article 3(1)(a) and does not fall under the exclusions of Article 2 of the Directive. The decisive criterion is the fulfilment of the definition of EEE. Thus, printer cartridges which contain electrical parts and are dependent on electric currents or electromagnetic fields in order to function properly fall within the scope of the Directive. Printer cartridges which merely consist of ink and a container, without electrical parts, do not fall within the scope of the Directive."

Producer

If you meet one of the following options, then you are also considered as a producer of EEE (printer cartridges) in the UK:

- manufacture and sell EEE under your own brand in the UK
- resell equipment made by someone else under your own brand
- import EEE on a commercial basis into the UK
- are established outside of the UK and supply EEE directly to the UK market by distance selling (e.g. online, mail order, phone)

Distributor

According to the WEEE Regulations 2013, a distributor is defined as: Any person who provides electrical or electronic equipment on a commercial basis to the party who is going to use it regardless of whether that person is providing goods to a consumer (i.e. an individual) or an end user. A producer who also supplies EEE direct to the person who is going to use it, will also be a distributor.

Retailers

Examples of retailers include: high street retailers, mail order sellers, wholesalers and internet sellers.

Distributor Obligations Enforcement

Distributor obligations and Regulation 22 (marking EEE with the crossed out wheeled bin symbol) are enforced by the National Measurement and Regulation Office (NMRO). [NMRO Enforcement Authority Enquiry Form](#)

Producer Compliance Scheme (PCS)

PCS takes on the obligations of producers to finance the collection, treatment, recovery and environmentally sound disposal of WEEE collected in the UK. They are responsible to send all WEEE items to an AATF and to ensure that WEEE for which evidence is issued is treated in line with guidance on BATRTT.

Approved Authorised Treatment Facility (AATF)

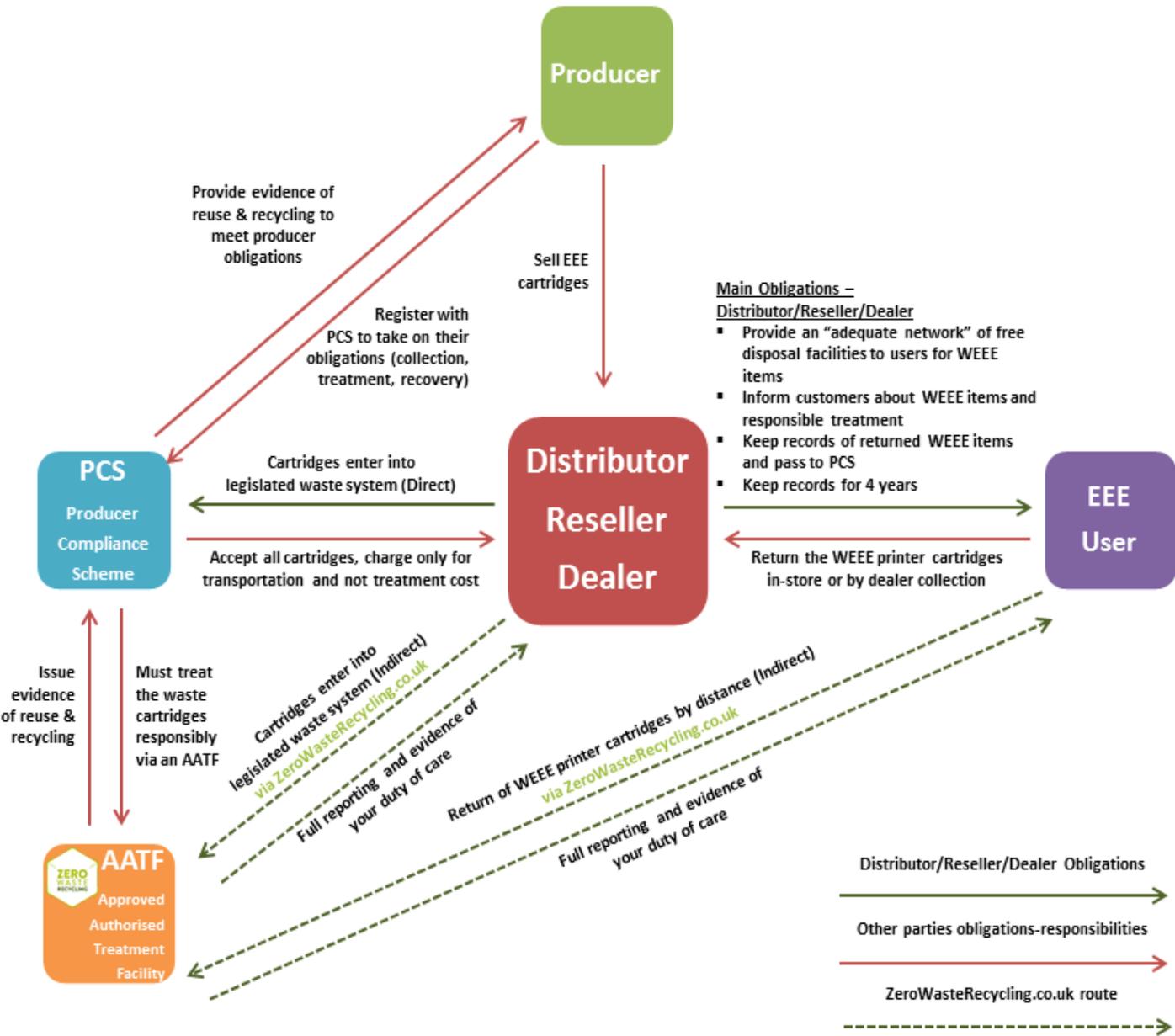
An Approved Authorised Treatment Facility (AATF) is a permitted (or registered exempt) site carrying out treatment on waste electrical and electronic wastes. Treatment can include depollution, disassembly, shredding, recovery, or preparation for disposal. An AATF can issue evidence notes for the treatment, recovery or recycling of WEEE that takes place in the UK on behalf of Producer Compliance Schemes (PCS).

Designated Collection Facility (DCF)

A Designated Collection Facility (DCF) is a facility that provides access to members of the public to dispose of household WEEE items. DCF needs then to pass all items to a PCS.

WEEE LEGISLATION & DIFFERENT PARTIES

The obligations of different parties and how ZeroWasteRecycling cover your needs!



ARE YOU A PRODUCER OF EEE? WHAT ARE YOUR LEGAL OBLIGATIONS!

Producer Compliance Schemes (PCS) take on Producer obligations to finance the collection, treatment, recovery and environmentally sound disposal of household and non-household WEEE collected in the UK.

Producers must also take on distributor responsibilities if they sell EEE direct to end users in the UK.

You are a producer of EEE in the UK if you **Manufacture** and sell EEE under your own brand in the UK | **Resell** equipment made by someone else under your own brand | **Import** EEE on a commercial basis into the UK | you are **established outside of the UK** and supply EEE directly to the UK market by distance selling (e.g. online, mail order, phone)

PRODUCER OBLIGATIONS

Obligation-1

Register as a producer of EEE annually

If you place less than 5ton (weight of empty cartridges) on the UK market

- Direct with your environmental regulator as small producer on the [National Packaging Waste Database](#) (NPWD - [Quick link of registration](#)) or with PCS.

If you place over 5ton on the UK market

- You must join a Producer Compliance Scheme by 15th November each year
- PCS will charge fees for its services and will take on your obligations to finance the collection, treatment, recovery and environmentally sound disposal of WEEE on your behalf

Obligation-2

Provide data of EEE placed on the market & keep records for at least 4 years.

Record the weight of items without including the weight of packaging or toner or ink or the weight of products that are not obliged.

Start keeping records from 1st January 2016.

Obligation-3

Make written information available to consumers & waste management operators to aid the recycling and re-use of products.

Obligation-4

Mark EEE products with the crossed-out wheeled bin symbol, date mark and producer identification mark (e.g. brand name). Details can be found in British Standard BS EN50419:2006 or later.



Obligation-5

Provide a registration number to distributors (will receive this when registering directly or via PCS) and can be incorporated into letterheads or provided in writing by other means when EEE is transferred (e.g. delivery notes, invoices)



PRINTER CARTRIDGES IN SCOPE & OUT OF SCOPE

Identify the products that you sell which attract a WEEE obligation.

It is the responsibility of the producer to determine whether a product is within scope of the regulations.

IN SCOPE

Any item needing electricity to function normally, which is placed on to the market for the first time
When a remanufacturer remanufactures someone else's cartridge (OEM, or third party)

Each time a cartridge is rebranded.

OUT OF SCOPE

When you just refill with toner ('topped up') your own brand cartridge.

When a remanufacturer refills a cartridge for someone else without placing their own name or brand on the cartridge.

DRUMS / SPARE PARTS

Drum Units with chips are in scope – Drums that contain no EEE are out of scope.

Spare parts are out of scope, Repaired EEE that is not rebranded is out of scope (e.g. transfer belts, fusers).

ARE YOU A DEALER/RESELLER OF EEE? WHAT ARE YOUR LEGAL OBLIGATIONS!

Dealers, Resellers or Distributors, are responsible for providing an 'adequate network' of free disposal facilities to consumers for B2C WEEE.

A producer who also supplies EEE direct to the person who is going to use it, will also be a distributor.

According to the WEEE Regulations 2013, a distributor is defined as: Any person who provides electrical or electronic equipment on a commercial basis to the party who is going to use it regardless of whether that person is providing goods to a consumer (i.e. an individual) or an end user.

DEALER/RESELLER/DISTRIBUTOR OBLIGATIONS

If you sell printer cartridges (EEE), then from 1st January of 2016, you will have the following legal obligations:

Obligation-1

Must provide a way for your customers to dispose of their used EEE (WEEE) when you sell a new version of the same item. The WEEE regulations apply regardless of how you sell the products, whether direct or by internet, mail order or telephone.

Option – 1

Provide a free take-back service

- Free take-back of old item when selling a replacement
- You can charge transport costs, if collecting from customers' premises
- Give customers at least 28 days to bring back their waste item
- Take back all types of EEE that you sell
- Must pass on collected items to a PCS – (direct or indirect) for treatment (collection costs may apply)
- Keep records of all WEEE received and the PCS it was passed to.

Option – 2

Set up alternative free take-back service

- Such as a 'Designated Collection Facility' (DCF) where customers can take all types of WEEE (Should be convenient and apply to all your customers. Main issue different client locations and long distances (client address – DCF location)

Option – 3

Join the Distributor Take-back Scheme (DTS)

- Membership of DTS discharges all distributor take-back obligations
- Supports a network of designated collection facilities across the country
- Must still provide information to consumers
- Cost depends on the size and nature of the retailer
- You can find more information here: <http://dts.valpak.co.uk>



**Around 75% of Printer Cartridges
End Up in Landfill each year**

DEALER/RESELLER/DISTRIBUTOR OBLIGATIONS

If you sell printer cartridges (EEE), then from 1st January of 2016, you will have the following legal obligations:

Obligation – 2

Required to provide information to your customers on:

- The meaning of the crossed out wheeled bin symbol
- The collection and take back systems available to them
- Their role in contributing to the reuse, recycling and other forms of recovery of WEEE under the regulations
- The potential effects on the environment and human health as a result of the presence of hazardous substances in EEE
- Requirements of the UK to minimise the disposal of WEEE to landfill, and to achieve high levels of collection of WEEE for environmentally sound treatment.

The information can be in the form of a poster, leaflet, electronic display (or on demand) printed material. If you supply EEE via several different means (for example, in store, on the internet, by catalogue), you must make this information available in writing to all users of EEE.

Template from Department of Business Innovation & Skills (BIS):

- [WEEE – Text for distributors to display under their obligations to take-back WEEE](#)

Obligation – 3

Keep records of the numbers of WEEE units returned to you

Records should be kept for at least four years and should be made available if necessary (WEEE 2013 Regulation 45). Include the number of units you've received through take-back and which PCS they were passed to for treatment. You need to keep all documentation you make, or are given by the Producer Compliance Scheme (PCS) – (Direct) or the Approved Authorised Treatment Facility (AATF) – (Indirect), when you dispose of Electrical and Electronic Waste.

Template from Department of Business Innovation & Skills (BIS):

- [WEEE – Distributor record keeping requirement under Part 5 of the WEEE Regulations](#)

Obligation – 4

Keep records of the information made available to consumers.

Records should be kept for at least four years and should be made available if necessary (WEEE 2013 Regulation 45). [Source](#)

Cooperation among Distributors/Resellers - Producer Compliance Schemes (PCSs) – Approved Authorised Treatment Facilities (AATFs)

Distributors should make arrangements **directly with a Producer Compliance Scheme (PCS)** to return the WEEE into the system for treatment at an appointed Approved Authorised Treatment Facility (AATF) **or indirectly via an AATF which is contracted by a PCS** to provide evidence of reuse or recycling.

Regulation 43 requires PCSs or contracted AATFs to accept WEEE direct from distributors free of charge. However, they may charge distributors for the transportation of WEEE from their premises where they are not an approved DCF but cannot make charges in relation to the treatment.

Do you have over 400m² retail premises?

You have Additional Obligation:

A distributor who supplies new EEE from a retail premises with a sales area relating to EEE of at least 400m² is required to take back very small WEEE free of charge to end users without there being any obligation on the user to buy new EEE.

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.

A distributor/reseller/dealer whose EEE retail sales premises are less than 400m² don't have this obligation.

**All your Distributor Obligations
can be easily fulfilled with little or no cost to you
via [ZeroWasteRecycling.co.uk!](http://ZeroWasteRecycling.co.uk)
Read on to find out how!**

HOW ZEROWASTERECYCLING CAN BE USED TO MEET YOUR FREE TAKE-BACK OBLIGATIONS!

Zero Waste Recycling is an innovative and environmentally sustainable printer cartridge recycling service created by BCMY Ltd.

We keep you compliant no matter what type or brand of printer cartridges you sell!

Our service fully meets the best duty of care a company can make when applying the legislated waste management hierarchy, (reduce, reuse, recycle, recover, disposal) to guide their decision making.

We reduce the impact of waste cartridges on the environment by reusing cartridges that are able to be refilled, and repairing broken but reusable cartridges. For those consumables that cannot be reused we recycle them back into their raw materials, rather than the more common disposal method of incineration or landfill, for reuse in other products.

The holder of waste has a duty of care to manage it properly, which is detailed within section 34 of the Environmental Protection Act 1990. This is satisfied by applying the waste management hierarchy to your decision making processes, as set out in article 4 of the EU Waste Framework Directive.



ZERO WASTE RECYCLING ADVANTAGES

ALL printer consumables accepted

Fulfil your duty of care

100% transparency

Clear and responsible process

ALL materials reused & recycled

Lower your impact on the environment

- Offer a ready-made co-branded collection system to you and your customers across the UK
- Offer the ability to spot sales gaps in customer usage
- Accepts any boxes or pallets delivered and processing them for free, including recycling of non-reusable items
- Fully compliant with all current legislation
- Offering the most environmental waste treatment services for printer cartridges in the UK
- No limitation on take back timeframe
- As a contracted AATF, we are able to take waste direct from the waste holder on behalf of a PCS
- Reports can be retrieved at any time for any time period

WHAT WE DO & KEY CHARACTERISTICS

COLLECTIONS

- Accepts all printer consumables no matter what type or brand
- Simple and user friendly online service
- Next working day collections
- Free acceptance of WEEE (printer cartridges) for those wishing to deliver
- No restrictions on volume or weights accepted
- Market leading co-branded recycling boxes for collection point promotion
- Waste Transfer Notes

MONITORING

- Detailed reporting on cartridges received
- Ability to manage multiple accounts / sites
- Ability to pull user defined reports over multiple accounts / sites
- Account hierarchy to allow vision into depth and breadth of collections

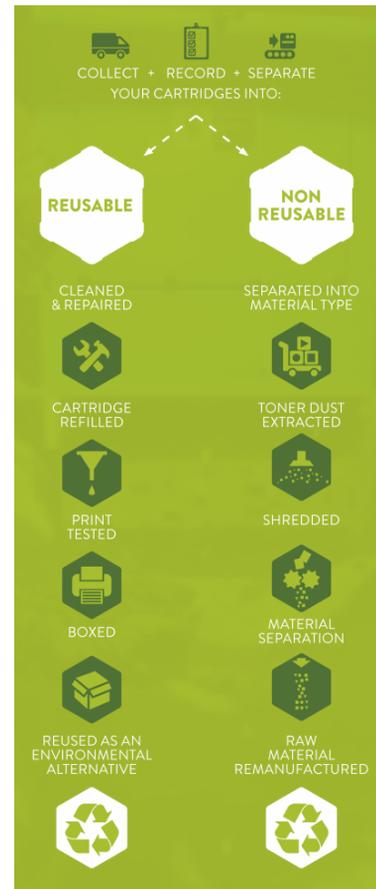
REUSE & RECYCLING

- Satisfies your duty of care when disposing of your waste to the highest standards
- Reuse of waste cartridges where possible
- Full end of life treatment for non-reusable cartridges back into their raw material form
- Zero Landfill, Zero Incineration, Zero Waste

COSTS (RESELLER and END USER)

- Choose to pay collection costs for all or some customers via ZeroWasteRecycling.co.uk (Collection Pools) or pass collection cost on to customer if preferable
- If your customers send straight to us their empty cartridges, they will have to pay only collection cost, whereas you collect them from your customers apply treatment fee
- Each branch/site should have a different ZeroWasteRecycling Account

* Do you want rebates for any reusable? Ask us to find about the different treatment cost.



Transport	Type	Dimension	Weight
Collection	Standard Box	Max 80x30x40cm	Max. 25kg
	Oversized Box	Max 80x40x50cm	Max. 35kg
	Pallet	Max 1m. x 1.2m - Max 2m high	No limitation
Delivery	Any box/pallet by customers own courier or transport method	Any	Any

3 DIFFERENT CASES WHEN DEALER SELLS TO CUSTOMERS & ALTERNATIVE SERVICES TO MEET YOUR OBLIGATIONS

Service	Sells over the counter	Delivers direct	Delivers via third party
Distributor/Reseller/ Dealer (Do It Yourself)	<ul style="list-style-type: none"> + Can accept used cartridges back at point of sale premises (free disposal service achieved) + Free to customer + Personal Service + Client retention + repeat custom 	<ul style="list-style-type: none"> + Can take back used cartridges at the same time as delivery (free disposal service achieved) + Free to customer + Personal service + Easy solution for customer 	<ul style="list-style-type: none"> + Can take back used cartridges at the same time as delivery (free disposal service achieved – free to customer) - Additional courier costs to receive the waste items back - Logistic organisation and new process setup/management
	<ul style="list-style-type: none"> - Necessary to have S2 waste exemption - Record receipt of waste items - Pass waste on to a PCS (Direct) or AATF (Indirect) 		
DTS Distributor Take-back Scheme	<ul style="list-style-type: none"> + Customers to return the WEEE cartridges to their nearest Designated Collection Facility – (Free disposal service achieved) + Quick and easy to sign-up for a dealer + Cheaper than running an in store take back service - Business customers may face issues delivering to household recycling sites - There is no collection option for the customer - Don't provide market advantage over other dealers in the area of environmental awareness, care or service offering - Not a co-branded service that you can offer through ZeroWasteRecycling.co.uk - No ready-made marketing material relevant to cartridges for dealer to display or use - Unable to show/publish cartridge recycling + reuse efforts of dealer - Not designed for maximum reuse – cartridges not segregated as a waste stream, resulting in less empties for the remanufacturing industry 		
 ZeroWasteRecycling.co.uk	<ul style="list-style-type: none"> ✓ Designed for maximum reuse of printer cartridges ✓ Don't need the customer to actually deliver items to household waste recycling site ✓ Can collect or receive deliveries of cartridge WEEE items from any UK address ✓ You can choose to pay collection costs for all or some customers via ZWR (Collection Pools) or pass collection cost on to customer if preferable. (free disposal service achieved) ✓ Recording of take back (customer and quantity) automatically achieved through ZWR. ✓ Provides analytical reporting on cartridge recycling + reuse efforts of the distributor/retailer/dealer ✓ No need for dealer to have a waste storage exemption S2, or record waste items internally. ✓ Co-branded service – reputation increase + client retention ✓ Ready-made marketing material relevant to cartridges for dealer to display or use ✓ Zero Landfill Zero Incineration Zero Waste solution ✓ Provides co-branded collection point boxes for promotion and marketing gains 		

In all cases the dealer and end user receive evidence from ZeroWasteRecycling that they have fulfilled their duty of care to the highest standard when disposing of their waste items

QUICK STEPS GUIDE

HOW TO ACCESS OUR SERVICE & FULFIL YOUR LEGAL OBLIGATIONS

1. Register with our service [here!](#)
2. Download the **ready-made marketing material**, regarding the information you need to provide to your customers and display on your website or in-store.
3. If you plan to offer the service directly to your customers, use the **intelligent recycling link** (located into your account: **Marketing Material**) as the way for your customers to **access your free take back and disposal service**. This link can be placed on your website, emails, digital invoices and delivery notes. It can also be used via our social media pages to cover your obligations and achieve your marketing objectives.
4. If you plan to collect directly from your customers and/or take-back in-store, you will not need to use the intelligent link, but can **book collections/arrange deliveries of your cartridge WEEE via your account**.
5. For every cartridge that we receive from you or your customers, we will provide a **full breakdown statement** showing what happened to each cartridge, reused or recycled, along with **all waste transfer notes and proof of your duty of care in dealing with your WEEE**.
6. **Log into your account to view and print any records**, statistics, Waste Transfer Notes, or proof of your duty of care **at any time**.

After completing all these steps,
then you are **FULLY COMPLIANT** with the **NEW WEEE REGULATIONS**
for **Distributors/Resellers/Dealers!**



FREQUENTLY ASKED QUESTIONS (FAQ)

What are my costs for the service?

There isn't any registration fee for our service. You can provide this service straight to your customers after completing your registration, and you can choose to pass all the collection costs to your customers! You will have to pay only when you are going to arrange a collection of printer cartridges from your premises.

Why is there a cost on the service?

We provide a service that can arrange collections across the UK, accepts all types and brands of printer cartridges, processes all reusable cartridges and recycles all the non-reusable items into their raw material forms. We only charge for the collection cost, while we provide all treatment and recycling for free, when we collect from your customers, ensuring you meet your obligations to provide your customers a free disposal route.

Do you accept other WEEE items except printer cartridges?

Our service is designed to accept all printer consumables, such as laser/toner cartridges, inkjet cartridges, inktanks, fusers, drum units, toner bottles etc. We don't accept any other WEEE item currently.

Why should I choose to sign up to ZeroWasteRecycling, instead of being part of Distributor Take-back Scheme (DTS)?

Being part of DTS is the easy choice, but can cause problems for your customers, whilst losing the chance to increase your environmental reputation. The customer needs to deliver items to a waste recycling site, and may cause problems to some businesses delivering large toner cartridges to the DCF. You lose any market advantage over other dealers in the area of environmental awareness, care or service offering. Not a co-branded service that can increase your reputation.



I have a recycling collection scheme already set-up!

If you already have a recycling scheme, please ensure that it is fully compliant with new WEEE regulations and meets all the following:

- Accepts all WEEE printer consumables
- Items received are passed to a PCS (Direct) or a contracted AATF (Indirect)
- Does not charge the customer (Collection cost acceptable)
- Records every item received
- Accessible and advertised to all your customers
- Lastly, check that you have the right waste storage exemption (S2) if collecting directly from your customer.

I collect and sell my customers empty cartridges, can I still do this?

If you collect and sell your customers empty cartridges, then you need to meet all the criteria mentioned on the above FAQ, as well as having a T11 - WEEE exemption and keep records of where all items went, using only ATF's etc.

What happens if I don't implement the necessary actions described in this document to become compliant?

If you fail to comply with the waste electrical and electronic equipment (WEEE) regulations, you can be prosecuted and fined up to £5,000 at a magistrate's court, or get an unlimited fine from a Crown Court.

You may sometimes get warning letters and formal cautions before a prosecution.

You can also [report someone who's breaking the regulations](#) to the National Measurement and Regulation Office (NMRO).

NMRO Enforcement Authority | Stanton Avenue, Teddington, Middlesex, TW11 0JZ | 020 89437227