

# Beyond Recycling: A strategy to make the circular economy in Wales a reality

Consultation response form (Number: WG39588)



Date of issue: 19 December 2019

Action required: Responses by 24 April 2020

<b>How to respond</b>	There are a number of questions within this consultation document. You can submit responses to these and add your own comments by post or by email to our dedicated consultation mailbox – or you can respond via our online questionnaire.
<b>Further information and related documents</b>	Large print, Braille and alternative language versions of this document are available on request. <a href="https://gov.wales/circular-economy-strategy">https://gov.wales/circular-economy-strategy</a>

## Contact details

For further information: [ResourceEfficiencyAndCircularEconomy@gov.wales](mailto:ResourceEfficiencyAndCircularEconomy@gov.wales)

Resource Efficiency and Circular Economy Division  
Welsh Government  
Crown Buildings  
Cardiff  
CF10 3NQ

Email:

[BeyondRecycling@gov.wales](mailto:BeyondRecycling@gov.wales) /

[MwyNagAilgylchu@llyw.cymru](mailto:MwyNagAilgylchu@llyw.cymru)

Telephone: 03000 060 4400

Mae'r ddogfen yma hefyd ar gael yn Gymraeg /  
This document is also available in Welsh

## General Data Protection Regulation (GDPR)

The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g. a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government's standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.

In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.

You should also be aware of our responsibilities under Freedom of Information legislation

If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years.

## Your rights

Under the data protection legislation, you have the right:

- to be informed of the personal data held about you and to access it
- to require us to rectify inaccuracies in that data
- to (in certain circumstances) object to or restrict processing
- for (in certain circumstances) your data to be 'erased'
- to (in certain circumstances) data portability
- to lodge a complaint with the Information Commissioner's Office (ICO) who is our independent regulator for data protection.

For further details about the information the Welsh Government holds and its use, or if you want to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer:  
Welsh Government  
Cathays Park  
CARDIFF  
CF10 3NQ

E-mail: [Data.ProtectionOfficer@gov.wales](mailto:Data.ProtectionOfficer@gov.wales)

The contact details for the Information Commissioner's Office are:

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 01625 545 745 or  
0303 123 1113

Website: <https://ico.org.uk/>

## Building on our recycling record

**Question 1:** Are the suggested actions the best way to help us recycle more?

Electrical Safety First is the only UK charity that seeks to prevent fires and incidents in people's homes in Wales caused by electrical sources of ignition. Electrical Safety First is interested in providing evidence to the Welsh Government's consultation on 'A Circular Economy' because of the increasing recycling and reselling of electrical goods including white good appliances by councils in Wales.

We support the Welsh Government's approach on better collection of electrical goods. Electrical goods in Wales are now being increasingly recycled - whether this is the breaking down of electrical items to components to be recycled or electrical goods being re-sold by councils as a complete unit.

Electrical Safety First supports the re-sale of electrical goods, but it needs to be done in a safe way and we have some concerns on whether adequate checking of electrical goods in Wales is undertaken prior to items being sold.

We do not believe local government recycling in Wales, generally follows good practice, particularly in relation to items being suitably inspected and tested, and checked as to whether they are subject to a recall notice. We believe that there is work needed to be undertaken to improve this policy area.

We would like to offer to work with the Welsh Government and local councils to ensure that the collection of this waste and how it is being processed is following stricter guidelines, including guidance on what should and what should not be recycled.

**Question 2:** Should recycling arrangements across Wales be consistent?

For electrical (WEEE) waste there needs to be a pan-Wales approach – our analysis shows there is great inconsistency across Wales in terms of WEEE. Our key points of note to the Welsh Government are: -

- **All** councils offer a service for WEEE waste to be recycled which is very welcome news.
- How WEEE waste is collected: - i.e. citizens need to transport the items themselves to the civil amenity sites vs collections at the kerbside. Currently, as we understand there are **zero** ‘amenity bins’ in Welsh neighbourhoods nor any kerbside collections of WEEE waste to improve recycling of it.
- Only a minority of Welsh Councils (**6** at the time of writing) offered re-sales of electrical goods.
- Only **2** councils who re-sold electrical goods stated they checked for safety and recalls – this is particularly worrying that electrical goods could be being sold that are subject to a recall. Electrical Safety First believes there needs to be much greater consistency on this and the organisation is willing to help local authorities through the WLGA support the drafting of guidance.
- **1** council when asked was unable to provide any information, nor were aware, on whether items were subject to safety tests or recall checking – we were referred to their contractor. There appears to be a lack of understanding in some councils on their legal obligations on passing on recalled goods whether to the public or a third party.
- Only **13** councils in Wales had information on their website on WEEE recycling. None of the councils had information for consumers on whether their items could be resold or offered items for re-sale. Communications with the public and transparency is very inconsistent.

Electrical Safety First believes that these are areas of policy that the Welsh Government will need to work with local authorities in Wales to provide better consistency. Given the Charity’s expertise in this policy area- we would welcome being part of this process.

**Question 3:** Are the suggested actions in this theme (Building on our recycling record) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

Electrical Safety First supports local authorities in Wales re-selling ‘appropriate, safe and checked for recall’ electrical goods. Local authorities can help prevent the sales of such items on online marketplaces as the public see them in a similar way to charities, as a trusted organisation from which to make such a purchase.

As the Welsh Government is aware, we have made representations to the Welsh Government regarding online marketplaces and their poor regulation of second hand sales of white goods. The Welsh Government needs to consider the consistency in approach to ensuing safety in Wales, and encourage those people wishing to dispose of their electrical goods, particularly white goods, to transfer them into the care of the local authority but also ensure there is a consistent safety process in place if they are to be re-sold. This will help prevent these items making their way on to highly unregulated online marketplaces.

## Supporting prevention and re-use

**Question 4:** What actions could we take to further promote the work on prevention and re-use that occur in our communities?

See above, there must be a consistent approach to the recycling and resale of electrical goods across Wales.

**Question 5:** Do you agree we should develop and expand the work we do in schools on waste prevention and re-use?

N/A

**Question 6:** What do you think are the key steps that we need to take to further reduce avoidable food waste?

N/A

**Question 7:** Are the suggested actions in this theme (Supporting prevention and re-use) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

Aforementioned, the re-use of electrical goods and their re-sale must be consistent across Wales. Presently there is too much localism underway with the sales of electrical goods, and by that we mean local authorities operate WEEE schemes that are different per local authority area. There is also much inconsistency in the approach to safety. These issues must be resolved. For example, most of the local authorities transfer WEEE waste to contractors – but it is unclear how these items are processed and whether they are recycled or resold back to the general public by contractors. There needs to be greater transparency on the processing of WEEE in Wales and individual local authority websites should have this information.

## **Driving innovation and materials use**

**Question 8:** Are the materials we have listed ones we should focus attention on?

N/A

**Question 9:** Are design changes in products using the materials listed an area to focus on?

N/A

**Question 10:** Are the suggested actions in this theme (Driving innovation and materials use) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy? Are there other materials we could focus on and why?

N/A

## Using Government levers

**Question 11:** Is our focus on improving resource efficient procurement within the Public Service a priority area?

N/A

**Question 12:** Is our focus on materials used and resource efficiency in construction a primary consideration to implement for the future?

N/A

**Question 13:** Are the suggested actions in this theme (Using Government levers) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

N/A

### **Enabling communities and businesses**

**Question 14:** Is our continued business support to make them more resource efficient a priority action?

N/A

**Question 15:** How would you view starting a Zero Waste Town area?

N/A



**Question 16:** Are the suggested actions in this theme (Enabling communities and businesses) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

Aforementioned, the Welsh Government needs to provide confidence to the Welsh public and better information on the end of life for electrical goods, what happens to these items and whether they are resold. The Welsh public is often unaware that their old electrical goods are resold - there is a need for greater transparency on this coupled with the need to prevent online marketplaces flooding communities with unsafe electrical goods.

### **Investing in infrastructure**

**Question 17:** Are the initiative actions mentioned here those we should aim to provide supporting infrastructure for?

We welcome the Welsh Government's intention to invest in processing facilities and machinery for WEEE , again, the Welsh public need to be reassured how their items are being recycled and to provide confidence that volunteering WEEE helps the circular economy in Wales, but also protects the environment and safety in the home.

**Question 18:** How can we work regionally to ensure resource efficient decision making?

On WEEE we would strongly urge the Welsh Government to work with us, local authorities and the WGLA to ensure consistent standards across Wales.

**Question 19:** Are the suggested actions in this theme (Investing in infrastructure) the right ones? If not, why? What other actions could we consider to achieve the aims of the strategy?

N/A

### Other questions

**Question 20:** We would like to know your views on the effects that our proposals in this document would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

N/A

**Question 21:** Please also explain how you believe the proposed strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for

people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

N/A

**Question 22:** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to address them.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please let us know by ticking the appropriate box.

If responding by post or email, please include your name, organisation (if applicable), phone number and address along with your response. Thank you.

Name: Robert Jervis-Gibbons

Organisation: Electrical Safety First [www.electricalsafetyfirst.org.uk](http://www.electricalsafetyfirst.org.uk)

Phone number: 0203 4 635131

Address: 45 Great Guildford Street, London, SE1 0ES  
[policy@electricalsafetyfirst.org.uk](mailto:policy@electricalsafetyfirst.org.uk)