

# Recolight Producer Member Guide Reporting EEE



Reporting your data incorrectly through the Recolight WEEE Hub could mean you are paying too much for your WEEE. You could also be at risk of failing an EA audit.

This guide outlines your reporting timeframe, and gives details of EEE reporting, dual use classification and more.

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## Declaration timeline

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The Environment Agency use the term Placed on Market (PoM) to ensure that all types of "sales" are covered, whether they are sold or given away.

Placed on market units are declared on the WEEE Hub, an internet system.

You can also find a link on the Recolight homepage in the top tool bar.

### WEEE Hub Declarations

**Reported between 1 and 15 of each month.** You are required to make an accurate declaration on the WEEE Hub of your placed-on market units and their aggregated weight.

## Environment Agency requirements for reporting

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### Quarterly Confirmations of Declarations

A confirmation of your monthly WEEE Hub declarations – submitted from the 17th to 28th each quarter.

### Annual Confirmation/Q4 Confirmation of Declarations

#### **Between 17 and 28 January**

A confirmation of the declaration data your company has submitted to the WEEE Hub throughout the previous year, summarised on a single page document.

This process is completed between the 17 January and 28 January each year and takes just a few minutes.

- ✓ The Confirmation document is downloaded from the WEEE Hub,
- ✓ It must be signed by a Companies House listed Director, either physically or via DocuSign
- ✓ If using a physically signed version, it must be scanned and uploaded on the WEEE Hub as a PDF.

**A process guide is sent to you in the second week of January.**

### Annual Statement of Compliance

#### **Between mid-September and 31 October**

The annual Statement of Compliance opens in mid-September each year and must be completed on our Recolight WEEE Hub no later than 31 October. Access is also through the Recolight WEEE Hub and selecting the coming year.

Emails will be sent in September, asking you to confirm the address, contact name and compliance details.

- ✓ Answer ALL questions
- ✓ Download document
- ✓ Signature required from a company director
- ✓ Upload document to system.

**If your annual turnover is less than £1M,** you must also send your last filed company accounts or last 4 VAT returns.

## Recolight Member Data Checks

The Recolight annual waste collection targets we receive from the Government is calculated from the PoM weight of the products our Members declare to us.

Inaccurate data could mean that

- You could be paying more than you should to us.
- Recolight have an unfairly allocated target. This could increase our costs as we would have to collect more than is needed.

That is why we check your data to make sure that you're reporting your products correctly; In turn, the Environment Agency audit our processes.

## What's involved

When we visit, we will talk through your systems and processes; checking the methodology of how you calculate your declarations.

**There are four key things we look for:**

1. Are declarations in line with the law – in particular, own brand, household and non-household product?
2. Are the correct number of units being declared?
3. Is the physical weight of product accurate and up-to-date?
4. Understand any unusual trends from our analytical review of your data.

Our checks have resulted in cost savings of over £100,000 for our Members.

**We have a three-tier level of verification:**

1. On-site visits
2. Desktop reviews
3. Analytical reviews

## Mistakes to look out for

As you can see from the list below – we've found various examples of products being recorded incorrectly.

Have a read through and see if any of these jump out at you:

- Own brand not being declared.
- Out of scope product being declared; for example, incandescent halogen lamps recorded as put on market.
- Cardboard packaging included in product weight.
- Out of date weight on product card / database or using incorrect units (for example, 0.1Kg being recorded as 1g).
- Incorrect Household v Non-Household declarations especially for luminaires.
- Multi-packs recorded as single items.
- Product type mis-classified; HH vs NHH luminaires, LED lamp vs luminaire and GDL vs CFLi.
- Non-lighting EEE categories not declared.
- Batteries incorrectly included in product weight.
- Spreadsheet errors, pivot and formula errors.



## Lighting in Scope of WEEE Regulations

All lighting in scope of the WEEE regulations is covered by the Recolight compliance scheme.

### Lamps – category 13

#### Gas discharge lamps:

- Straight fluorescent tubes
- Circular fluorescent tubes
- Compact fluorescent lamps
- High Intensity Discharge lamps
  - High pressure sodium HPS or SON
  - Low pressure sodium SOX lamps (street lighting)
  - Metal halide
  - Ceramic metal halide
  - Mercury
  - Xenon
  - Induction

Most of these lamp types are used in both household and non-household applications.

#### LEDs

- LED retrofit lamps User
- LED Tubes
- replaceable LED modules – e.g. Zhaga modules

### Lighting Equipment – Category 5

- Traditional luminaires
- LED luminaires
- LED street lighting
- Household luminaires

A Luminaire is a complete lighting unit consisting of a light source and also the parts which help to position, protect or connect the light source.

The Recolight luminaire collection and recycling service is provided for Recolight Producer Members' obligated waste.

### Small household appliances – category 2

- Light switches
- Dimmers
- Plugs
- Sockets
- Adaptors

### Lighting products not in scope of the WEEE regulations

Incandescent lamps (e.g. GLS, halogen) are not in scope of the WEEE regulations and not collected by Recolight.

## Dual Use Classification

### Of WEEE lighting equipment as B2B or B2C

Products that are designed solely for businesses should be classified as B2B. Those that are designed for consumers, or for both businesses and consumers should be classified as B2C.

The Government guidance includes general principles, and then specific examples to show how those principles should be applied for each of the different categories of equipment.

It is for each Producer to make their own assessment of their products, using steps 1-3 in the Government guidance. It should be noted that guidance on lamps and luminaires inevitably diverges: lamps are generally more generic and interchangeable than luminaires.

### Recolight lamp and luminaire classification advice

Our advice for producers has been written in consultation and agreement with the Lighting Industry Association. The Recolight and LIA advice are both fully aligned to the BIS guidance.

#### Luminaires (category 5)

An example of a dual use luminaire is a downlight designed to take a GU10 or MR16 lamp. We recommend that you classify luminaires (both traditional, and LED integrated) as B2B. The following are examples that could be considered as 'dual use'.

- Downlights and spotlights of a domestic scale
- Batten fittings
- Domestic scale decorative fittings
- Corridor/bulkhead luminaires of a domestic scale
- Any luminaires currently considered as B2C

Scale typically refers to the size of fittings. The above products could all be regarded as dual use, and therefore B2C. Emergency luminaires should be classified as B2B.

#### Gas Discharge Lamps and LED Light Sources (category 13)

The guidance states "The majority of lamps are designed and capable of dual use so should be classified as B2C. Classify as B2C gas discharge lamps, LED light sources (lamps) and sodium lamps (includes retrofit and non-retrofit lamps). Classify as B2B floodlights for stadiums and lamps used in cinema projectors."

We recommend that you classify all lamps (both traditional and LED) as B2C except the following:

- Lamps for use in stadium lighting
- Lamps used in the curing industry
- Xenon and LED cinema projector lamps
- Any similar lamps designed specifically and solely for industrial applications

As a reminder, all incandescent lamps remain out of scope of the WEEE regulations.

#### Models must be either B2B or B2C

It is important to note that you must classify a product either as B2C or B2B. You cannot split your data to record the same product as partly B2C and partly B2B. This is a change from the previous system, in which it was possible to record a proportion of product as B2B, and B2C.

#### Visibility of WEEE charges

##### **Regulation 51 states:**

A producer or distributor must not show a person, who purchases EEE otherwise than in the course of a business at the time of sale of new EEE, the costs of financing the collection, treatment and environmentally sound disposal of WEEE from private households.

Businesses can be shown the WEEE charge.