



Department
for Business
Innovation & Skills

**IMPLEMENTATION OF THE WEEE
RECAST DIRECTIVE 2012/19/EU AND
CHANGES TO THE UK WEEE
SYSTEM**

Response Form

APRIL 2013

IMPLEMENTATION OF THE WEEE RECAST DIRECTIVE 2012/19/EU AND CHANGES TO THE UK WEEE SYSTEM – RESPONSE FORM

The Department may, in accordance with the Code of Practice on Access to Government Information, make available, on public request, individual responses.

The closing date for this consultation is **21/06/2013**

About You

Name: British Entertainment Industry Radio Group

Organisation (if applicable): British Entertainment Industry Radio Group

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Please choose the option(s) that apply

<input checked="" type="checkbox"/>	Business representative organisation/trade body
<input type="checkbox"/>	A Producer Compliance Scheme
<input type="checkbox"/>	A Producer of EEE
<input type="checkbox"/>	A Distributor (retailers and distance sellers) of EEE
<input type="checkbox"/>	WEEE Treatment Facility
<input type="checkbox"/>	Waste Management Company
<input type="checkbox"/>	Electrical Reuse Organisation
<input type="checkbox"/>	Central government
<input type="checkbox"/>	Charity or social enterprise
<input type="checkbox"/>	Individual
<input type="checkbox"/>	Legal representative
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Micro business (up to 9 staff)
<input type="checkbox"/>	Small business (10 to 49 staff)

	Medium business (50 to 250 staff)
	Large business (over 250 staff)
	Trade union or staff association
	Other, please specify

Where to Send This Form

This form can be submitted online/by email or by letter or fax to:

Graeme Vickery
Green Economy Team
Department for Business, Innovation and Skills
1 Victoria Street
London
SW1H 0ET
Tel: 020 7215 1836
Fax: 020 7215 8242
Email weee@bis.gsi.gov.uk

Respondents in Scotland should also send their response to:

Tim Chant
Zero Waste Delivery
Area 1-H North
Victoria Quay
Tel: 0131 244 7869
E-mail: timothy.chant@scotland.gsi.gov.uk

Respondents in Wales should also send their response to:

Alex Hamilton
Waste and Resource Efficiency Division
Welsh Government
Cathays Park
Cardiff
CF10 3NQ
Email: alex.hamilton@Wales.gsi.gov.uk

Respondents in Northern Ireland should also send their response to:

Janis Purdy
Environmental Policy Division
DoENI
6th Floor, Goodwood House
44-58 May Street
Town Parks
Belfast
BT1 4NN
Email: wslpr@doeni.gov.uk

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Implementation of Recast WEEE Directive 2012/19/EU and Changes to the UK System – BEIRG Response

The **British Entertainment Industry Radio Group (BEIRG)** would like to take this opportunity to highlight the case of the **Channel 69** clearance as part of the 800 MHz spectrum reallocation to mobile broadband services, as it may inform future decisions on how best to implement WEEE regulations in the instance of any further spectrum clearance.

In 2009 Ofcom announced that wireless microphone users would be evicted from the 800MHz band to make way for new mobile broadband services. The UK Government agreed to fund part of the clearance of the band, by compensating wireless equipment users due to be moved from this spectrum. To qualify for taxpayer funding, redundant Channel 69 equipment had to be surrendered. A company was employed by Ofcom to administer the funding scheme. Subsequent to the handover of Channel 69 equipment for disposal, the scheme administrator began to look for markets to resell this surrendered equipment. The scheme administrator imposed a requirement on purchasers to **modify, destroy or return the equipment to them** by the time licensed, lawful use of channel 69 finished at the end of 2012.

Disposal of the equipment, as electrical waste, was to be carried out under the **Waste Electrical and Electronic Equipment regulations**, but it was unclear who was ultimately responsible for this eventual disposal. Due to the lack of clarity in the proposal it was debated whether the administrators of the scheme should be responsible for managing the disposal of the decommissioned equipment in line with environmental regulations. Alternative suggestions were that Ofcom, as the regulator and instigator of the scheme, had final responsibility for the equipment's disposal, or even that the original manufacturers of this equipment had final liability. This would have caused excessive financial and logistical burdens on these companies, who had not been involved in the resale of equipment or management of the funding scheme.

There was a real lack of clarity about the responsibility for the disposal of this obsolete equipment. BEIRG believes that the UK's new WEEE regulations should learn from this case study and take it into account, and should ensure that final responsibility for the future disposal of waste electrical equipment is clear from the outset. In the instance of another such funding scheme taking place in the future for wireless microphone equipment (or any other electrical products), responsibility for disposal **must not rest with the manufacturers**, but with those imposing or administering the scheme, from an efficient, financial and logistical sense.

British Entertainment Industry Radio Group

The British Entertainment Industry Radio Group (BEIRG) is an independent, not-for-profit organisation that works for the benefit of all those who produce, distribute and ultimately consume content made using radio spectrum in the UK. Venues and productions that depend on radio spectrum include TV, film, sport, theatre, churches, schools, live music, newsgathering, political and corporate events, and many others. BEIRG campaigns for the maintenance of 'Programme Making and Special Events' (PMSE) access to sufficient quantity of interference-free spectrum for use by wireless production tools such as wireless microphones and wireless in-ear monitor (IEM) systems.

As well as being vital in producing live content, wireless PMSE technologies play a key role in helping to improve security and safety levels within the entertainment industry and other sectors. Their benefits include improving the management of electrical safety, the reduction of noise levels, the development of safety in communications and reducing trip hazards as well as providing an essential tool for the security orientated services. Wireless equipment and the spectrum it operates in are now crucial to the British entertainment industry.

BEIRG is a member of the Association of Professional Wireless Production Technologies (APWPT)¹, which promotes on an international level the efficient and demand-driven provision and use of production frequencies for professional event productions, as well as safeguarding such production frequencies for the users on the long run.

¹ <http://www.apwpt.org/>

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