

EPA inspection guidance for the retail sector



The EPA organises annual programs of inspections at retail and wholesale outlets across the country. The EPA is the main authority for these inspections although the Local Authorities also carries out these inspections. At these inspections we will check for compliance against several legal obligations including:

- Registration of your premises with a Compliance Scheme using www.licences.ie.
- Displaying the registration certificate at your premises.
- Displaying the statutory notice at your premises.
- Appropriate storage of WEEE and batteries.
- Keeping records for take-back and collection of WEEE.
- Displaying visible Environmental Management Costs (vEMC's) on the relevant products.
- Take back of WEEE and batteries.

After each inspection, we will issue a site visit report to you (by email and by regular mail). This report includes observations, non-compliances and the necessary corrective actions for you to become compliant. We will follow up on the reports to close out the non-compliances.

Here is some guidance on what we require for compliance at an inspection:

Registration of your premises – Your premises must be registered. You can register your premises on the www.licences.ie website. A registration certificate will be emailed to you.

Display registration certificate and statutory notice - Print out a copy of the 'statutory notice' and the 'registration certificate' and hang them up in your premises. We can help you with this at the inspection if you do not have them. Promotional signs such as the 'We'll take it back' posters are of course helpful to customers, but they do not meet your legal obligation to display the statutory notice or the registration certificate.

Storage of WEEE - The EPA understands that the provision of adequate WEEE storage is a challenge for many outlets, but it is very important that WEEE is stored appropriately.

Where you have an arrangement for the WEEE to be taken for repair it should be put to one side and stored under weatherproof covering where it can be collected later by the Compliance Scheme. It is critical that this kind of WEEE is protected as much as possible from the weather so that it can be repaired and used again. It is ideal if WEEE that will be repaired is stored indoors but, if you do not have enough room indoors, then other acceptable solutions include the use of shipping containers, sheds or covered cages and containers with lids.

Equipment with screens such as old TV's, flat panel display equipment, temperature exchange equipment, photovoltaic panels, night storage heaters etc. must be kept under weather proof covering and should be stacked in a stable manner to prevent damage or breakage. Try to keep photovoltaic panels out of daylight during storage.

If the WEEE being stored contains oil or other liquids or hazardous materials then it must be kept under weather proof covering *and* must be stored on an impermeable surface to prevent pollution by leaks (e.g. from refrigerators, air conditioners and radiators). You should have absorbent materials available in case of a spill.

Covering with tarpaulin can be acceptable provided the covering is adequate to protect the WEEE from rain and the tarpaulin is secured to prevent it from blowing away. In cases, the WEEE should be raised off the ground (e.g. on pallets) to keep it away from rain water on the ground. The inspector will advise you during the inspection on whether these arrangements are adequate at your premises.

Not all WEEE needs to be covered. If the WEEE is not going to be repaired or if it does not contain oil or other liquids (i.e. no risk of spill), then it can be left uncovered. However, the uncovered WEEE should not be stored without collection for more than 14 days.

Lamps should be stored separately from other WEEE. If possible, store them indoors or else store them under weatherproof conditions such as in a sealable container to avoid damage or breakage before they are collected. Any broken lamps or bits of broken lamps lying around should be cleared up as quickly as possible and also stored in a sealable container.

Loose batteries should be stored in a sealable weatherproof container. Do not store them within two metres of any combustible materials.

In order to prevent loss of WEEE from the recycling system, the security of the WEEE should also be a factor when considering storage. The WEEE should be stored in a secure location, where possible. While this is not specified in the WEEE Regulations it is considered best practice. It makes sense that the WEEE should be protected against theft.

Overall, good site management and housekeeping should be employed at all times to address all environmental, health and safety concerns.

Any WEEE that you take back from customers must be handed over to the Compliance Scheme operating in your area. This is a legal requirement. You are not permitted to sell WEEE or to harvest parts from the WEEE.

Record keeping - You must take back WEEE at your premises if a customer requests it. The WEEE will be collected by your Compliance Scheme. You must also maintain records of WEEE take back and collection. A sample blank form for recording 'take back and storage' is available on the EPA website at:

<http://www.epa.ie/pubs/advice/waste/weee/weeestoragerecordtemplate.html>

We will accept collection dockets as the record of 'collection' Be sure to get a paper or digital docket when WEEE is being collected. Contact your Compliance Scheme if you do not get one.

Your Compliance Scheme will provide you with boxes to take back old batteries from customers.

visible Environmental Management Cost (vEMC) – Display the (vEMC) on the price notice of each relevant electrical/electronic product. The display should include the following wording:

"Included in this price is a contribution to recycling costs of [insert amount of environmental management cost]"

Please note - not all electrical/electronic products require a vEMC. You do not need to display a vEMC on batteries.

A full listing of vEMC's can be found here <https://www.producerregister.ie/uploads/content/CategoriesListing.pdf>

Tell the inspector if you are having difficulties with displaying vEMC's. They will help you to find a solution.

Take back of WEEE – You must ensure that WEEE and waste batteries (only the type that you sell) can be accepted at your outlet and you should let customers know that you will take them back. For this, you can use signage, or you can include some message on your sales documentation. WEEE take-back must be on a one-for-one, like-for-like basis. Customers do not need to make a purchase to return waste batteries.

Producer obligations – Please note that you should only sell EEE and/or batteries that are supplied by a producer (i.e. manufacturer or importer) that is validly registered with the Producer Register Ltd. If you import your own products, then you will need to register as a producer. The inspector will check this at the inspection.

Ask the inspector if you are unsure about whether you have producer obligations.

Any questions that you may have can be directed to the EPA. You can contact the inspector who carries out the inspection or you can send an email to weee@epa.ie.

The EPA has produced a significant amount of compliance guidance for the retail sector, including:

- A two-page retail compliance guidance leaflet which can be downloaded from the EPA website at:
<http://www.epa.ie/pubs/advice/waste/weee/weeeandbatteriesretailerguidanceleaflet.html>
- On the EPA website pages at www.epa.ie/enforcement/weee/retailersdistributors/
- A comprehensive guidance document for the retail sector which can be downloaded from the EPA website at: <http://www.epa.ie/pubs/advice/waste/weee/inforetailereeeandbatteries.html>

The compliance schemes can be contacted on at www.erp-recycling.org/ie (ERP Ireland) and www.weeeireland.ie (WEEE Ireland).