





- a. Agree
- b. Disagree
- c. Unsure

The Royal Society of Chemistry does not have a strong opinion on whether the proposed Scheme Administrator is the correct method of governance for the revised WEEE system. However, we welcome the proposal of a governance system that will lead to coherent oversight across all the nations. We also welcome the suggestion that the Scheme Administrator may have a number of functions to fulfil if this leads to evidence informed, coherent decision making.

In principle, the Royal Society of Chemistry welcomes the introduction of other success measures in the revised WEEE system, particularly those that may lead to evidence on the circularity of the system, critical mineral flows, or that may measure and monitor a breadth of environmental impacts, including greenhouse gas emissions and water usage. Mass-based targets as in the current system do not give an indication of, e.g., critical mineral flows, or any kind of environmental weighting to the type and composition





longer an item is stored for before entering the circular economy, the more likely it is that it will not be following as tight a loop and therefore its potential value will not have been optimised.

At present, there are some examples of materials recovered from WEEE being used as secondary raw material, e.g. by the Royal Mint. However, increasing the usage of secondary raw materials so this is done at scale will likely require incentivisation or regulation by Government. Alongside this, facilitating cross-sector collaboration to enable the circularity of materials, components and products at industry level will be important in helping to close loops and establishing the usage of secondary raw materials. This is likely to require additional data to be gathered to understand the industrial reliance on various materials, including critical minerals.

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In a survey carried out by the Royal Society of Chemistry, the majority of respondents said they would be more likely to buy a piece of technology from a rival to their preferred brand if they knew it was sustainably produced (1). The majority also agreed that it is currently difficult to find out if a device has been produced sustainably before purchasing. Therefore, product labelling that gives consumers better visibility of the sustainability of a product (including eco-design criteria) is likely to be a helpful part of the proposed eco-modulation criteria, and in principle is something the Royal Society of Chemistry is supportive of, depending on the quality, reliability, and implementation of this labelling.

(1)







