

## **WEEE SCHEME FORUM**

**Proposal to DEFRA for approval to continue to operate the  
PCS Balancing System from 2022**

**31 March 2022**

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### Proposal to DEFRA for approval to continue to operate the PCS Balancing System from 19<sup>th</sup> July 2022

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## **1 Summary**

Defra has invited proposals to operate the PCS Balancing System (PBS), and this document summarises the WEEE Scheme Forum (WSF) proposal.

The WSF has operated the compulsory PBS for managing Regulation 34 collection requests since 2019, and prior to that operated a PBS on a voluntary basis.

The Secretary of State has a duty to review the existing PBS in line with Schedule 11, paragraphs (5) through (9) of [The Waste Electrical and Electronic Equipment \(Amendment\) \(No. 2\) Regulations 2018](#).

The WSF considers the current PBS works well and proposes that Defra re-appoints WSF to operate the PBS. This response is therefore very largely based on our 2019 submission, but with some proposed changes which are detailed below.

We understand that if DEFRA approves a PBS with amendments, then all PCS members will need to resign from the existing PBS, and then rejoin the new scheme. This would be an unwelcome and onerous administrative task for no benefit. We therefore request that DEFRA approve the continuation of the existing PBS unamended for a period of 3 years, with the changes requested being implemented thereafter in accordance with the PBS change procedure; this requires the agreement of 65% of PBS member PCSs and DEFRA. If this is not possible, we request that DEFRA approves the PBS as set out in this proposal, and WSF will ask all member PCSs to resign from the existing PBS and rejoin the new scheme.

Anthesis Ltd has acted as the operator of the WSF PBS since 2016, and this proposal recommends that they continue to perform this function.

## **2 Outline of how the current PBS works**

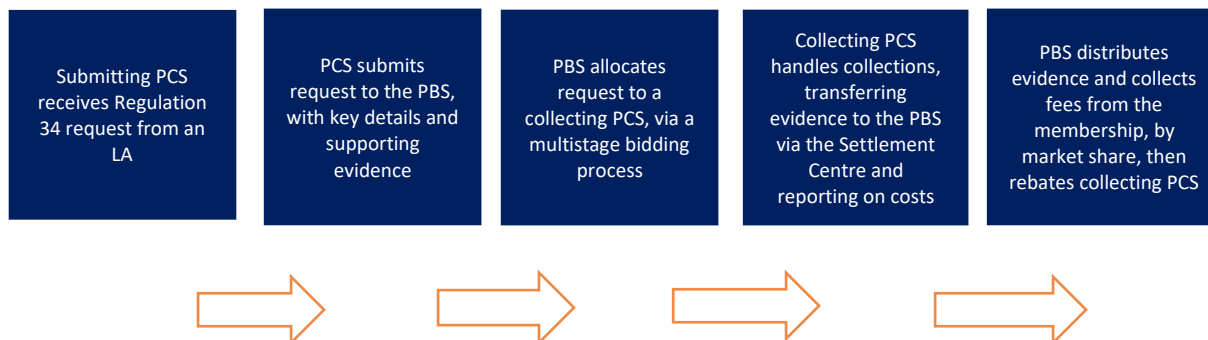
### **2.1 Background to Regulation 34 requests**

A local authority (LA) has a right under Regulation 34 of the WEEE Regulations 2013 to ask any PCS to collect WEEE from their Designated Collection Facilities (DCFs) free of charge, if they cannot find a PCS to work with. This right requires LAs to make this request each time they need a collection, which is impractical, and as the request can be made to any PCS, it could be made to a PCS that does not need the WEEE to meet its WEEE financing obligation, or that does not have the infrastructure in place to manage WEEE collections.

When the WEEE Regulations changed in 2014 this became problematic for some LAs and a voluntary initiative, the PCS Balancing System (PBS), was established by the majority of PCSs to ensure all LAs received a collection service, with the costs being shared between the PCSs. The LAs that use the PBS are often those with remote and expensive to service locations. Defra liked this initiative and in 2019 made PBS membership mandatory for all household PCSs. The WSF made a PBS proposal which was selected by Defra, and Anthesis Consulting UK Ltd was appointed as its independent PBS operator.

## 2.2 PBS methodology for fulfilling the requirements of Regulation 34

The approach to fulfilling LA Regulation 34 requests is based upon an anonymised competitive bidding process, which has been designed to meet the regulatory requirements, minimise disruption to LAs, comply with competition law and encourage competitive pricing. The process is summarised as follows:



The process in more detail:

- A member PCS that receives a Regulation 34 request from an LA, can choose to either fulfil the requirements on their own or submit all or part of the Regulation 34 request to the PBS. An LA can either request a one-off collection, or an ongoing service. To date, an ongoing service has always been requested.
- When submitting a request to the PBS, PCSs provide basic information about the requesting LA, including whether a one-off collection or an ongoing service has been requested, and supporting information about the DCF sites to be cleared, to inform potential bids. Requests are split into the 6 collection categories for WEEE: LHA, Small Mixed WEEE, Cooling, Display, Lamps, and Photovoltaic Panels (WEEE streams).
- PCSs submit evidence that the Regulation 34 request is valid (usually a letter from a Local Authority confirming that they have no contract with a PCS, or that it is expired, or is about to expire, and that they are serving the Regulation 34 on a PCS) and any supporting information about the DCF sites.
- The PBS operator (Anthesis UK) then starts a multi-stage allocation process within 3 working hours of receipt of the request, which works as follows:
  - At Stage 1, all member PCSs are offered the opportunity to claim the request and handle it unilaterally; this means they bear the full cost of the collection service provided to the LA and retain the associated evidence notes. These requests are allocated on a first come first served basis and requests claimed at Stage 1 are no longer in the domain of the PBS. Member PCSs have 1 business day to respond and can claim one, some or all streams in any given Regulation 34 request;
  - If one, some or all of the WEEE streams in a Regulation 34 request have not been allocated at Stage 1, the allocation procedure progresses to Stage 2. Details of the opportunity are circulated to all member PCSs, with an invitation to bid to collect WEEE on behalf of the PBS, for recharge to the collective membership. Member PCSs are given 15 working days to prepare bids, which

take the form of a separate, all inclusive, price per tonne for each WEEE stream on offer. It is not compulsory for member PCSs to submit bids, and they may choose to submit bids for some or all of the WEEE streams on offer. Offers must be unconditional, unambiguous and the lowest price bid for each WEEE stream wins. If two bidders submit the same price for a WEEE stream, the bid received first by Anthesis wins. Where an ongoing service is requested by the LA, bidders can commit to making collections for 6 months, 12 months or to the end of the compliance year (the latter must meet the minimum 6 month criteria), at their own discretion, but the duration has no bearing on the awarding of the bid which is always done on lowest price;

- If no PCSs bid at Stage 2, a final bidding process would be run for 1 business day as Stage 3;
  - If still no PCSs bid, the request would be randomly allocated in Stage 4 to a PBS member who must fulfil the collection on behalf of the PBS membership at actual cost plus a 10% administration charge;
  - To date no requests have gone beyond stage 2, because it is in the interest of PCSs to bid to ensure costs are controlled;
  - In 2019 an exception change to the PCS charging process was agreed with Defra and other PBS members to deal with the impact of the requirement to irreversibly destroy POPs in plastic derived from Display and SMW. This significantly increased the cost of treating WEEE in these categories which may not have been reflected in a PCS's original winning PBS bid. PCSs undertaking PBS collections were able to request a variation to the price they bid, subject to providing appropriate evidence to Anthesis.
- 
- The cost of handling Regulation 34 WEEE collections made in each quarter are allocated to the PBS members, by WEEE stream and by market share, as specified below:
    - The PCSs undertaking the Regulation 34 collections submit reports to Anthesis stating the tonnes collected and the cost claimed (as bid). Anthesis verifies this data, including reconciliations to evidence notes;
    - Anthesis calculates by WEEE stream the total collection costs to be shared by PBS members and any rebates due to PBS members who have undertaken the collections;
    - Anthesis calculates its administration charges for handling any PBS requests received in the quarter and for undertaking the quarterly cost and evidence allocation;
    - Anthesis calculates the total cost to be allocated to PBS members by stream and divides this between the PBS members in line with their market share. The same process is followed for the evidence note tonnage;
    - An invoice or credit note is sent to each PCS. The value on the invoice is a single aggregate figure to prevent back calculation of winning bids. The evidence due to the PCS is detailed by category;
    - PBS members are required to pay invoices within 10 working days of receipt (5 working days for Q4 invoices due to the end of year compliance deadlines). Anthesis transfers evidence to each PCS evidence account in the Settlement Centre as payments are received and pays PCSs for any credit invoices once all funds are received.

### **2.3 Further details**

- Anthesis operates a web-based system that allows local authorities to make Regulation 34 requests and for managing the bidding process.
- Each participating PCS has signed an agreement which binds them to the Rules of the PBS. The Rules set out the bidding and cost sharing principles of the PBS.
- A Procedures Manual sets out all PBS processes in more detail.

### **2.4 Summary of changes implemented since the mandatory PBS was implemented**

The PBS has operated largely unchanged since it was moved onto a statutory footing. The only material changes implemented are as follows:

1. Stage 2 bidding was extended to 15 working days, to allow PCSs more time to assess the costs of collection.
2. A move to automated handling of new Regulation 34 requests meaning that handling of all stages are immediate and automatic, whilst overseen by Anthesis for quality assurance and governance of process.
3. The Online platform has been developed to provide visibility of collection requirements and volumes per site, bid stage data, for both current (open) and historic requests, by LA.

## **3 Areas for further improvement**

### **3.1 Regulation 34 tender notice period too short**

It was felt by many PCS and AATFs that insufficient notice was available to prepare for a PBS Regulation 34 tender.

### **3.2 Stage 1 of tender process too short:**

The current PBS Stage 1 tender invitation is only live for 24 hours which many PCS thought gave insufficient time to decide whether and how they could take the Regulation 34 WEEE on a free collection basis. After 24 hours it entered Stage 2 bidding.

### **3.3 Insufficient information provided on DCF site restrictions for Regulation 34 bids**

The Regulation 34 tender information includes site addresses and estimated quantities of the different WEEE categories, it may also include site opening hours but little else. There are likely to be restrictions on access times, container types, loading aids and vehicle movement. The incumbent will know all the site foibles and intricacies whereas other bidders will have to build in an allowance for unforeseen restrictions putting them at a disadvantage. It would be very useful to have a standard information pack which would include site photos to aid in the bid preparation for each DCF. The incumbent PCS would be best placed to provide this information and it can be confirmed by the LA.

### **3.4 Linked bids to cover several WEEE Categories**

Where a DCF has several WEEE streams it may be viable to collect multiple categories on the same load which can reduce transport and handling costs, time on site and carbon footprint. When calculating a bid price for a PBS contract a PCS must put in a bid for each category but the costs may vary depending upon whether they are going to collect everything or just some of the categories. The PBS is bound to take the lowest cost bid for each category so the bidding PCS is unsure what they might win and must therefore assume the worst case that they just get one category and price accordingly. Some PCSs would like the option to put in alternative bids, based upon a single category or based upon more than one category on an all or nothing basis.

### **3.5 Price review mechanism needed**

PCS bids to PBS for Regulation 34 contracts are for a fixed cost per tonne and so it is up to the bidding PCS to build in cost escalators for fuel, labour, employment costs, treatment charges and material rebates etc for the duration of the contract. LAs and AATFs want longer contracts because that reduces management hassle, guarantees WEEE quantities and spreads equipment costs over a longer term. However longer contracts increase the cost risks (eg inflation) for the bidding PCS so they must build in an allowance for this, ie higher bid price. In addition, during the last 2 years situations have arisen where storage, collection or treatment requirements have changed and must be implemented with very short notice periods ie before existing PBS contracts expire. For example POPs in display, cables, microwaves and heat pump tumble dryers. This means that the winning PCS faces unforeseen cost risks which will lead to higher bid prices and even a reluctance to bid at all. The request is that bidding PCSs should continue to build predictable cost variables and known future storage, collection and treatment changes into their bid prices and carry the risk of these changes, but that there is a mechanism which will allow them to recover any unforeseen additional costs from the wider PBS membership from the time these changes are implemented until the end of their contract term.

### **3.6 Contract length insecurity**

If an LA puts in a Regulation 34 request and the PBS subsequently arranges the contract there is nothing in the agreement preventing the LA from withdrawing their request and taking the WEEE back to allocate to their preferred PCS. To date this has never happened but the risk exists and if this did happen the winning PCS could find itself liable for fixed set up and removal costs and new equipment costs that must be paid to their AATF or subcontractor which they could not recover from the PBS. This risk is particularly relevant if the contract involves the purchase of bespoke or new containers. The existence of this risk means that the bidding PCS must either build in extra cost (higher bid price) to cover the liability or will refrain from providing the most appropriate equipment. The upside for the remaining PCSs is that if an LA removed WEEE from a Regulation 34 contract because it wished to treat the WEEE itself or found a willing PCS partner then the remaining PCSs would save the cost and lose the evidence from the remainder of the contract. This scenario has not happened to date.

### **3.7 PBS transition period between contracts too short**

Currently when a new PCS wins a Regulation 34 contract through the PBS they have 5 days to complete the changeover from the incumbent. This is a short period meaning that the previous skips may be collected whilst empty or only part full and PCS contractors must rush to find and deliver the replacement containers. The 5 day changeover is specified in paragraph 8 of the "collection of WEEE from DCFs code of practice"

Where a previous Regulation 34 PBS contract is coming to an end to be replaced by a fresh Regulation 34 contract there is no practical reason why the transition period from the date when the winning bidder is informed to the date when the skips need to be changed over cannot be extended.

## **4 Recommended enhancements to address those areas**

### **4.1 Regulation 34 tender notice period too short**

Anthesis will create a summary page on the portal showing all the existing Regulation 34 PBS contracts and their end dates. The details of the LA DCF sites, WEEE streams and estimated quantities will still be accessible to PCSs on the PBS portal so they can anticipate the likely Regulation 34 request and subsequent tender. It is also hoped that a PCS looking to source more WEEE will refer to this list, identify suitable LA partners and approach them directly.

30 days before the end of any PBS Regulation 34 contract an automatic message will be sent to all PCS notifying them of this. (See example email in Appendix 3)

Anthesis will also contact the LA to ask whether they have organised a PCS to take over collections when the existing PBS contract expires or if they expect to be making a fresh Regulation 34 request. We cannot find anything in the Regulations preventing a Regulation 34 request in anticipation of a need for WEEE collections at a future date so we would encourage incumbent PCS and LAs to state their intentions and requirements at the earliest opportunity to allow for the maximum period for the PBS tender process and an orderly implementation period.

### **4.2 Stage 1 of tender process too short**

Stage 1 of the Regulation 34 PBS bidding process will be extended to 5 days, overlapping Stage 2 to allow a PCS more time to decide whether they will put in a free collection bid and thereby remove this WEEE from the Regulation 34 request and the PBS. This would still be on a first come first served basis so the first PCS to offer take Regulation 34 WEEE off the PBS will be awarded the work.

### **4.3 Insufficient information provided on DCF site restrictions for Regulation 34 bids**

All PCSs will be asked to agree to complete the Regulation 34 information pack for DCFs where they are the incumbent and the future PBS Regulation 34 contracts will be amended to include a requirement to complete the information pack at least 30 days prior to the end of the contract so it will be available for any future Regulation 34 requests. See proposed form in Appendix 5.

### **4.4 Linked bids to cover several WEEE Categories**

Currently Regulation 34 bidders enter a price per tonne of each category of WEEE and the lowest bidder for each category wins the contract. In future where there is more than one WEEE category a bidding PCS can also submit a cost per tonne of each WEEE category based upon winning ALL of the categories on offer. If their overall bid is lower than the sum of the lowest individual bids then they will get the contract. If the sum of the individual bids is lower than the linked bid then the individual bidders will win their respective contracts. It would be possible for a PCS to put in individual category bids and a separate linked bid covering all the categories. This change was an issue of some debate amongst existing PBS members, with some concerned that the mechanism could result in “gaming” the system. It was therefore concluded that we should propose implementing this change for an initial 12 month period, after which a review would assess if the benefits outweigh any risks. The mechanism to be operated by Anthesis is summarised at Appendix 1.

### **4.5 Price review mechanism needed**

There will be a price review mechanism which can be triggered following significant legislative or treatment requirement changes which lead to increased collection and treatment costs. This will not include unpredictable but normal operational costs such as haulage costs, fuel, labour costs, insurance etc nor will it include costs that were known at the time of bidding. The affected PCS can



request a review from Anthesis for a specified change that has led to additional costs for specified WEEE streams. Anthesis will assess the request in consultation with DEFRA and if accepted by both, will agree the methodology for calculating and refunding the additional costs to the PCS for remainder of the PBS contract or until the additional costs cease. See proposed outline methodology in Appendix 2

#### **4.6 Contract length insecurity**

An LA has the right to change its PCS provider at any time, subject to any contractual terms. It was concluded that a LA cannot be forced to accept the fixed term contract and may wish to retain the freedom to change its mind whereas the winning bidder is committed for the agreed term. We will therefore ask the LA making a Regulation 34 request whether they will voluntarily enter into a fixed term contract and publish their agreement (or otherwise) on the tender document. The bidders would then be more willing to invest in newer equipment or additional resources given the surety of the contract.

#### **4.7 PBS transition period between contracts too short**

Where a previous Regulation 34 PBS contract is coming to an end to be replaced by a fresh Regulation 34 contract the transition period from the date when the winning bidder is informed to the date when the skips need to be changed over can be extended to a maximum of 15 days on request by the incoming PCS, and if the outgoing PCS also agrees. The old PCS would continue to be paid at the "old rate" until the transition date and the new PCS will be paid at the new rate from the transition date. Where an LA puts in a Regulation 34 request because it does not have any collection arrangements in place (for example where the existing PCS has ceased trading) then the transition / implementation period will be reduced to 5 days.

### **5 Additional observation with no recommendations**

There was some debate within the WSF on whether a PCS may be able to use the Regulation 34 system for commercial advantage. One scenario is where a PCS with an LA contract may not want certain categories of WEEE from the DCFs they service, for example because it is too expensive to collect or because they can already meet their requirements for that category from other sources and the PCS does not want to be left incurring costs and holding evidence that it is unable to sell on at a price that recoups their costs. The incumbent PCS could then inform the LA that they no longer want specific WEEE categories and the LA could put in a Regulation 34 request. The incumbent PCS is now best placed to win the Regulation 34 tender as they know all the site details and already have vehicles going to the sites to collect other WEEE categories. They may then be able to submit a bid that is cheaper than the costs another PCS can work to when only collecting 1 category, but the price is high enough to effectively subsidise the incumbent PCS's other waste streams and they do not need to worry about selling on any surplus evidence. One option would be to preclude the PCS which has dropped the WEEE category into the PBS from bidding for that work. The disadvantage would be that the winning bid price may be higher than the incumbent would have bid, but the advantage is that this restriction may deter the incumbent from dropping the WEEE category into PBS in the first place and look for a surplus evidence trading solution instead.

We did not reach consensus on how to address this issue as there was debate on whether excluding an individual PCS from a specified tender was legal under competition law and we did not know how to weigh the benefit of a potentially lower winning bid against the benefit of a PCS holding on to unattractive categories and not utilising the PBS at all. It was noted that the cause of the potential problem was the fear of a PCS "overcollecting" WEEE and being left with costs for evidence that it did not need and which it could not defray to other PCSs. This structural weakness may be best addressed in future amendments to the WEEE Regulations and the annual target setting.

## **6 PBS charges to individual PCSs**

All costs of running the PBS are charged to household PCSs. That charge comprises two elements:

- An annual PBS membership fee. In 2021 this charge was £600 plus VAT, for each PCS.
- A market share based split of the actual costs of managing regulation 34 requests, and of collecting and treating the collected WEEE (for which evidence is issued to the PCSs).

The costs of running the PBS are dependent on a number of factors outside of the control of the WSF, including, for example, the number of household PCSs that continue to operate. Nevertheless, we anticipate that the current annual PBS membership fee will be unchanged if this new PBS proposal is implemented.

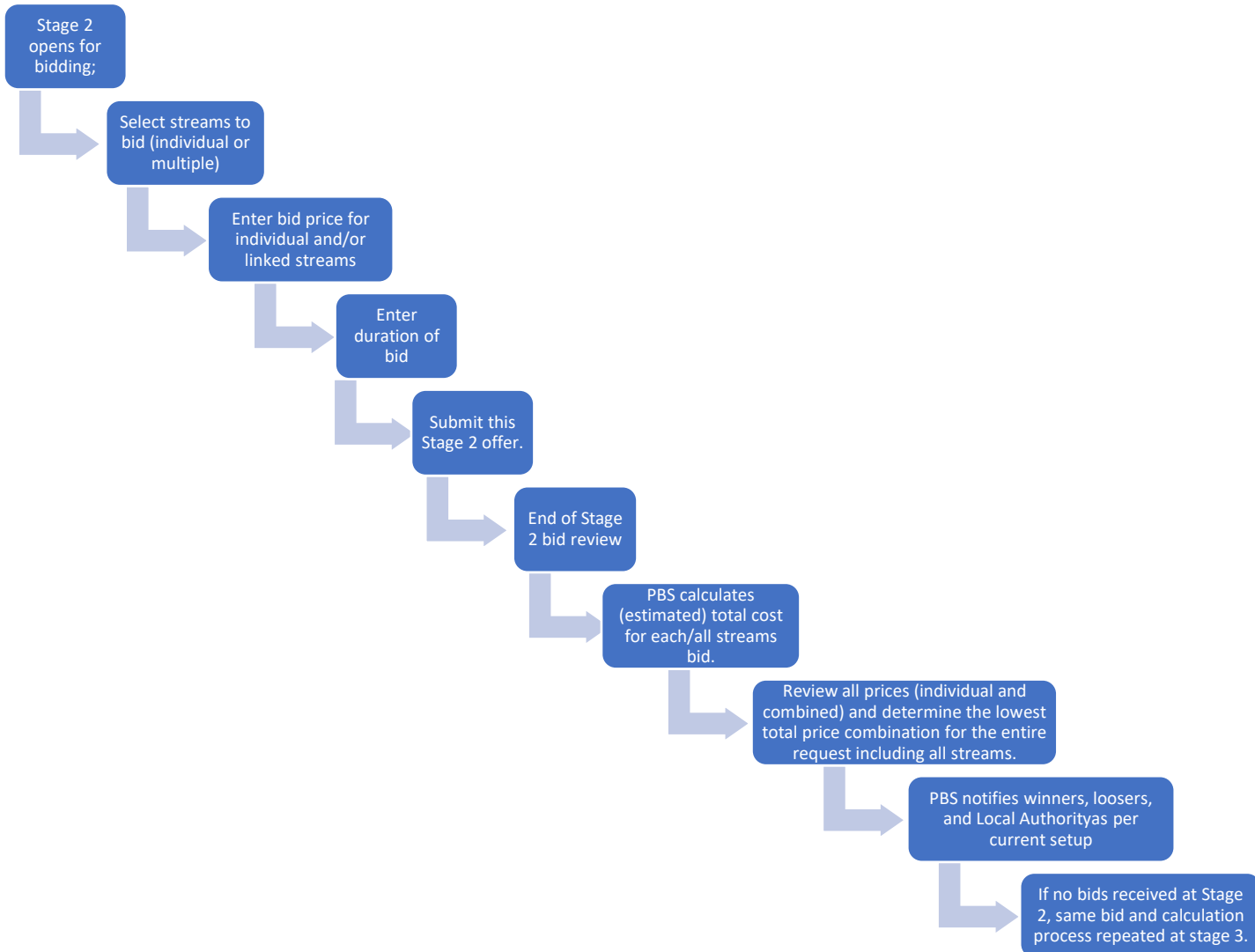
In addition, Anthesis have confirmed that the administration costs they charge to the PBS will remain unchanged if the existing PBS is renewed.

It is also noteworthy that a number of the changes proposed within this document are intended to remove uncertainty for PCSs when bidding to collect Regulation 34 WEEE, which should have the effect of reducing evidence costs to all PBS members.

## **7 Other changes**

We consider that it may be necessary to amend the PBS operating procedures and other PBS related documentation, in accordance with the existing PBS agreement signed by all PBS members. Any such amendments will be discussed with Defra prior to implementation.

## Appendix 1 – Processing of linked bids



## **Appendix 2 – Exceptional WEEE cost review mechanism**

There is currently an exceptional risk around pricing for WEEE recycling, resulting from unforeseen changes to guidance or technical interpretations or collection and treatment standards during the life of a Regulation 34 contract. As such, we are implementing a temporary measure to mitigate against potential price changes that may place an unfair burden on individual collecting PCS. This measure is intended to control costs, benefiting all PCSs, by providing a safety valve in the price submitted by a PCS for the operation of collections of a stream of WEEE from a DCF or group of DCFs.

Where increased storage, collection and processing costs result in the PCS allocated the collections no longer being able to complete the collections at the price bid for the full period allocated (which may be 6 months or 12 months) then it is considered appropriate for there to be an exceptional price review mechanism available. This will ensure that the level of price risk an individual PCS takes when submitting a price bid to service a regulation 34 request on behalf of the PBS is reasonable – thus avoiding the need to include excessive risk weighting in their price calculation and thus delivering better value for all participating PCSs.

For the avoidance of doubt the exceptional circumstances for which the review would be considered do not include normal transport costs and risks such as vehicles, fuel, road taxes, insurance and labour. Nor would they apply to factors which were known and understood to the industry at the time when the bids were made. Examples where the price review mechanism might have applied would be reclassification of WEEE streams due to POPS requiring additional treatment costs or where some LHA such as microwaves re-directed into the SMW stream, provided that increased the resultant collection and treatment costs.

### **The review process**

#### **1) Requesting a price review**

After each three month period of providing a collection service the allocated PBS member may apply confidentially to the PBS operator, Anthesis, for a revision to the service price. The application must arise solely as a result of increases levied by the PCS's subcontractors for increases in treatment and reprocessing costs associated with the unpredicted external mid term change to the WEEE stream collected and that were not included in the original bid submitted. The PCS must provide clear evidence from its subcontractor outlining the price change (£x/t), confirm it is solely in relation to the effect of the unpredicted external mid term change, state the WEEE stream it relates to and the date of implementation of the price change. At this stage Anthesis should contact Defra to establish if the change is considered material and whether this price review mechanism should operate.

#### **2) Reviewing the price review request**

Anthesis will compare the price review request against benchmark information received from all PBS collecting PCS as follows:

- After each three month period, starting from a date agreed by Anthesis and Defra, all collecting PBS members will be asked to confidentially provide Anthesis with evidence of changes received in relation to the agreed cause of the cost change, by WEEE stream.
- Anthesis will calculate a weighted average price change resulting from the change for each stream being serviced under an allocated PBS request (£X/t on top of the base quoted price). This will serve as the benchmark.
- If the price review request is for less than or equal to the benchmark, Anthesis will approve the price increase requested for implementation in the next quarter. If the request exceeds the benchmark, Anthesis will approve a price increase based on the benchmark for the quarter (i.e. the price will never exceed the benchmark). In any event Anthesis will not

communicate to the PCS what the price change is, but will take account of this in the quarterly cost reconciliation. The PCS should therefore continue to submit reports to Anthesis based on the original bid price. This is to avoid providing the PCS requesting the price review with any market sensitive information.

All submissions for price increase requests from collecting PCSs and benchmark cost information must be accompanied by evidence from the PCS's subcontractor. Evidence of cost changes related to the cause of the cost change must be written (email is acceptable) and dated after implementation date of the service. The evidence must be explicitly related to the agreed cost change cause, from the AATF only and must include a specific numerical change in the service charge (£X/t on top of the base price) and the date of implementation. Evidence and requests will only be accepted by Anthesis if the price changes are clear and unequivocally as a result of the change. Anthesis reserves the right to discount from the weighted average cost/tonne calculation any outlier evidence.

These strict conditions must be met, but this allows for a bid price review every 3 months and it is anticipated this mechanism will remain for 5 quarters following introduction and then be reviewed by the WSF membershipS.

If a PCS' subcontractor has levied a price increase that meet these criteria, and the PCS wishes to review their bid price, they can present the information as outlined, to Anthesis via [wsfpbs@anthesisgroup.com](mailto:wsfpbs@anthesisgroup.com)

### **Appendix 3 - Local Authority contract renewal email**

We consider that early notification of the intention to serve a Regulation 34 request is desirable. It allows PCSs to properly consider whether they wish to provide a service to the LA, and increases the chance of the LA obtaining a direct collection service. It also means they are more likely to receive an appropriate level of service as PCSs will have more chance to consider this. We therefore propose that Anthesis issue the following email, which may be further amended in the light of experience:

Dear Local Authority,

Some of your WEEE streams currently managed through the WEEE PBS scheme will be coming up for renewal soon where a 6 month collection arrangement was offered by the WEEE Producer Compliance Scheme (PCS). For clarity, the end date for the 6 month collection arrangement will be [Date].

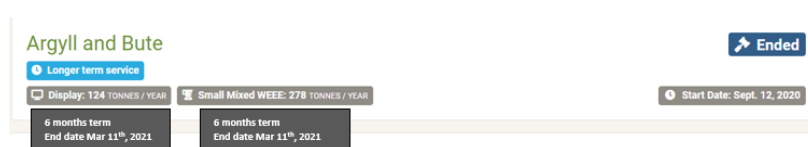
Please inform us whether you have a PCS organised to collect these WEEE categories from your Designated Collection Facilities (DCFs) or HWRC from the end of the current arrangement period. If you do not and so expect to need to submit a Regulation 34 request to a WEEE PCS, please reference this start date in your Regulation 34 request letter.

We request that you inform us of your intentions approximately 30 days before the end of the current arrangement to allow adequate time to make fresh arrangements with the minimum of disruption and inconvenience

Kind regards

## Appendix 4 – Proposed changes to the PBS web based system

1. Add a mandatory to complete tick box to the “New request” page, using existing text alongside ( “ I confirm that I have received a Regulation 34 request as detailed above, and that I have verified that this request complies with Regulation 34 and the WEEE Code of Practice. I will comply with my obligations under the PCS Balancing System agreement.”).
2. Regulation 34 requests that complete stage 2 or 3, the duration a winner offered will be provided. This start **and end date** can be calculated based on the date the winner is notified +5 days as the start date, (or the start date submitted in the REGULATION 34 request if later than this winner notified +5 days). The actual number of days will change. These dates are to be displayed **per category**, and are added to ‘Close request’ web page in format similar to this mock up:



3. Retracting a bid at stage 2 and stage 3. Add functionality to the site to allow a user to withdraw their bid entirely from requests that reach either stage 2 or stage 3. This withdrawn bid will be effectively nullified and not considered at the end of the relevant stage. It would not stop the user from submitting a new bid that would be considered as part of the end of auction price review for either stage 2 or stage 3.
4. Where a Regulation 34 request is being managed through the PBS, but is subsequently withdrawn prior to end date through a PCS making a direct arrangement with the LA, add functionality for Anthesis admin to edit this request on the ‘closed request’ web page;  
**A)** Where a Request (per category) reaches the closed status after either stage 2 or stage 3, allow Anthesis admin to manually edit this end date (per category) displayed on the closed request page – see item 2 above. Allow Anthesis admin to make this request invisible from the closed request page 30 days later from editing the date. Anthesis admin have visibility from admin page of the history of events, but as a client user, this category request is no longer visible from the closed request page.  
**B)** Develop and agree with WSF a documented process for managing these Regulation 34 request withdrawals, and an offline document template allowing PCSs to submit a PBS withdrawal form to the PBS allowing them to notify the PBS that a particular request and category request is being withdrawn mid-term.
5. When entering a new request there is a feature to add site addresses. Once the user clicks ‘add’ there is no way to remove or edit these site details. Add functionality to edit or remove addresses previously added, whilst midway through this ‘new request’ entry of information to the webform. (note; this is not for open requests, but only the data entry into new request page before it becomes ‘live’ for stage 1).
6. Once a duration for a PBS managed Regulation 34 request ends and the LA does not renew the Regulation 34 request via the PBS again, this will be removed from the closed request summary page.
7. Add a downloadable template of DCF site details for Regulation 34 requests – additional flat page for website (form is downloaded and completed by a PCS, then approved by the LA, before the PCS receiving the Regulation 34 request submits it via the PBS portal).

8. Linked bid algorithm for bid review – at stage 2 where more than 1 stream is available, a PCS can combine offers for multiple streams, and the site will need to calculate the lowest overall cost (gross) for that Regulation 34 request, based on tonnes quantity entered with original request as well as £/tonne bid offers from each PCS. Website calculates total cost for all streams bid based on known fixed quantity. At end of Stage 2, review all these prices (individual and combined bids) and determine the lowest total price combination for the entire request including all streams.



