

# WEEE Compliance Essentials for Facilities Managers

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Last month, a facilities manager contacted us in a panic. Their company had just been audited, and they couldn't produce waste transfer notes for IT equipment disposed of 18 months earlier. The potential fine? Up to £5,000 per offence.

This scenario is more common than you might think. WEEE (Waste Electrical and Electronic Equipment) compliance often falls into the grey area between IT, procurement, and facilities management. Yet when things go wrong, it's the facilities manager who's asked to explain what happened to that pallet of old monitors or those boxes of end-of-life laptops.

## Why WEEE Compliance Matters to Facilities Managers

As a facilities manager, you're responsible for waste management across your site. That includes electrical equipment. Whether it's a server refresh, office refurbishment, or warehouse clearance, electronic waste must be handled correctly under UK WEEE Regulations 2013 (as amended in 2024).

The regulations exist for good reason. Electronic equipment contains hazardous materials like lead, mercury, and cadmium. When dumped incorrectly, these substances leach into soil and water. Proper WEEE recycling recovers valuable materials and prevents environmental harm.

But beyond the environmental imperative, there's a legal one. Non-compliance carries unlimited fines for businesses. And increasingly, auditors are checking WEEE documentation during ISO 14001 assessments

and supplier due diligence reviews.

## The Four Critical Requirements

Every facilities manager should understand these core WEEE obligations:

### 1. Use Authorised Waste Carriers

You cannot hand electronic waste to just anyone. The company collecting your equipment must hold a valid waste carrier licence (upper-tier for most commercial IT waste). Always verify their registration with the Environment Agency before handing over assets.

### 2. Obtain Waste Transfer Notes

For every collection, you must receive a waste transfer note within 28 days. This document proves you transferred waste to an authorised carrier. Keep these for at least two years. Without them, you have no proof of legal disposal.

### 3. Ensure Proper Treatment

The waste carrier must deliver equipment to a facility with appropriate environmental permits. For IT equipment, this typically means an authorised treatment facility (AATF) or a site operating under a T11 exemption. Your waste transfer notes should specify the final treatment destination.

### 4. Maintain Data Security

While technically separate from WEEE regulations, data protection is inseparable from IT disposal. Hard drives containing personal or business data must be destroyed to HMG Infosec Standard 5 or equivalent. Certificates of destruction should accompany your waste transfer notes.

## Common Pitfalls (And How to Avoid Them)

**The Storage Problem:** Old equipment accumulates in cupboards, under desks, and in storage areas. It becomes “someone else’s problem.” **Solution:** Establish a quarterly clearance schedule. Treat e-waste like any other waste stream with regular, documented collections.

**The Unverified Contractor:** A bloke with a van offers to “take it off your hands” for free or even offers to pay for old equipment. If they’re not registered waste carriers, you remain legally liable if that equipment ends up fly-tipped. **Solution:** Always check the Environment Agency public register before accepting any offer.

**The Missing Documentation:** Collections happen, paperwork gets lost in email folders, and 18 months later you can’t prove what happened. **Solution:** Create a dedicated folder (physical or digital) for all WEEE documentation. File waste transfer notes immediately upon receipt.

**The Data Security Gap:** Assuming the recycler will handle data destruction without explicit confirmation. **Solution:** Specify data destruction requirements in writing before collection. Only accept certificates showing specific destruction methods, not vague statements about “secure processing.”

## Your WEEE Compliance Checklist

Make your life easier with this practical checklist for every IT disposal:

- Verify waste carrier registration (check Environment Agency register)
- Confirm they hold appropriate environmental permits
- Request data destruction certificates (before collection)
- Maintain asset register of items leaving site
- Receive waste transfer note within 28 days
- File documentation for minimum two years
- Note final treatment destination
- Include disposal date in asset management system

### The Bottom Line

WEEE compliance doesn't need to be complicated, but it does need to be systematic. Treat electronic waste disposal with the same rigour you apply to other controlled waste streams. Verify credentials, maintain documentation, and establish regular clearance schedules.

Most importantly, don't let old equipment accumulate into a compliance headache. Quarterly collections with proper documentation create an audit trail that protects both your organisation and the environment.

When an auditor asks about those old laptops, you'll have the paperwork to prove you did everything correctly.