Valpak
a Reconomy Group company

Reducing risk and protecting your brand



International environmental compliance.

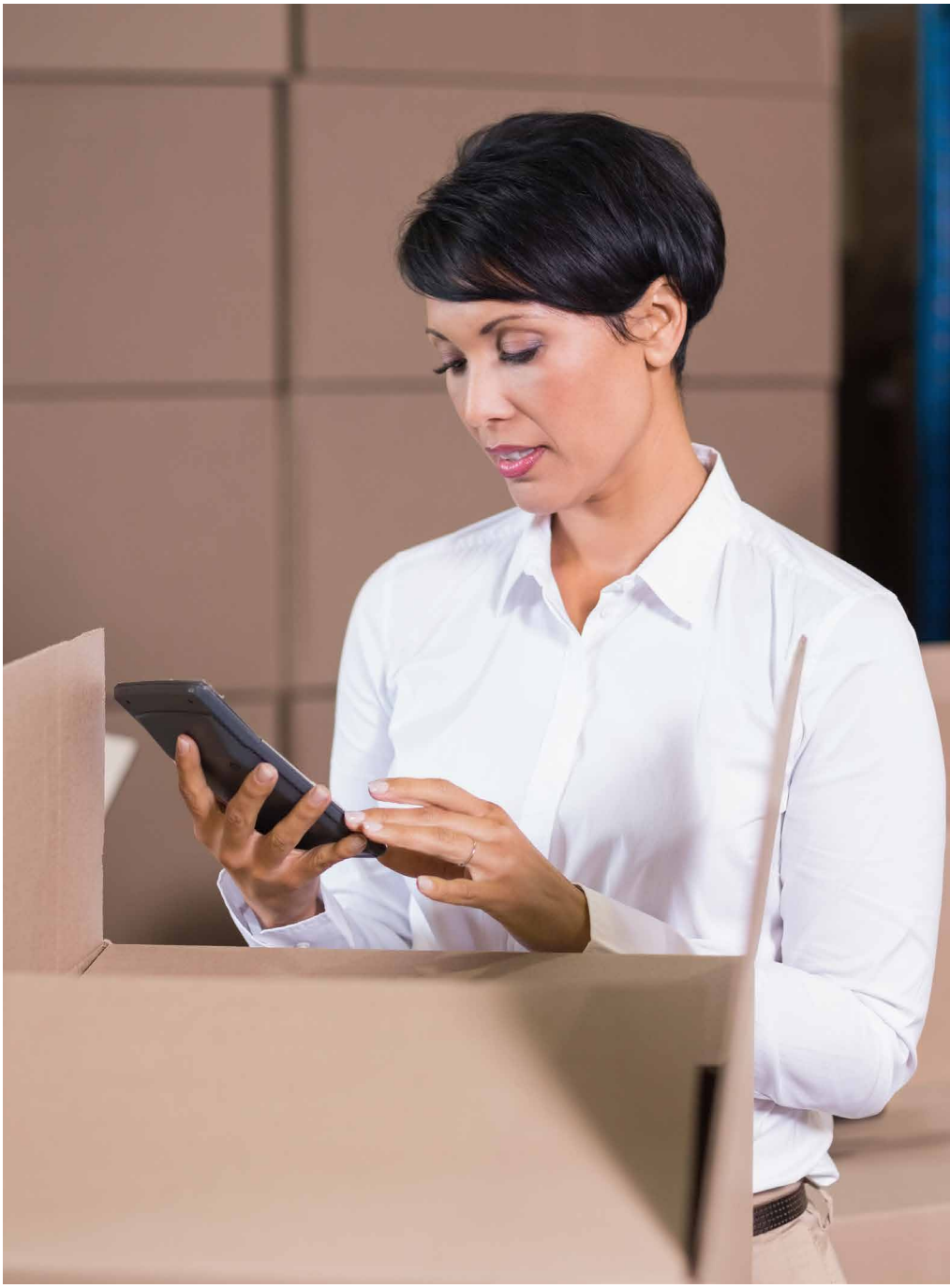
Are you an established or fast-growing UK based retailer operating in, or selling into, international markets?

If you have responsibility for international business, environmental compliance, corporate social responsibility, brand protection or reputational risk, it is important that you understand the range of environmental producer responsibility legislation that your company may be obligated under.

Compliance is important as failure can result in enforcement action, ranging from official warnings through to prosecutions, with the potential for significant fines and the withdrawal of your products from the marketplace.

A significant additional risk of non-compliance is damage to your brand and reputation, and the associated negative impacts on your staff, customers, shareholders, and ultimately your profit.

Confidence that your overseas compliance is being met supports ongoing international business expansion and mitigates against any brand and reputational damage.



Research and registration.

How can research and registration help your company to comply?



Compliance is complex and varies by country, types of packaging materials and products, methods of sale, thresholds, and whether you are selling to distributors and retailers, business end-users or directly to consumers.

To establish your obligations within each country you will need to research the legislation, review the products you sell and the methods of sale - you may need to contact schemes directly as guidance is often not in the public domain. Ideally you should do this before placing your products on the market as they may be withdrawn if not compliant.

Once you have established any obligations, you will usually need to register with a compliance scheme. There are usually different schemes for packaging, WEEE and batteries with each requiring a separate registration.

There may be only one or several schemes to choose from, with the process of registration varying from quick and online to onerous and protracted.

Retailers distance selling EEE products may need to find a nominated third party, an “authorised representative”, to register on your behalf.



Data management.

How can data management help your company to comply?

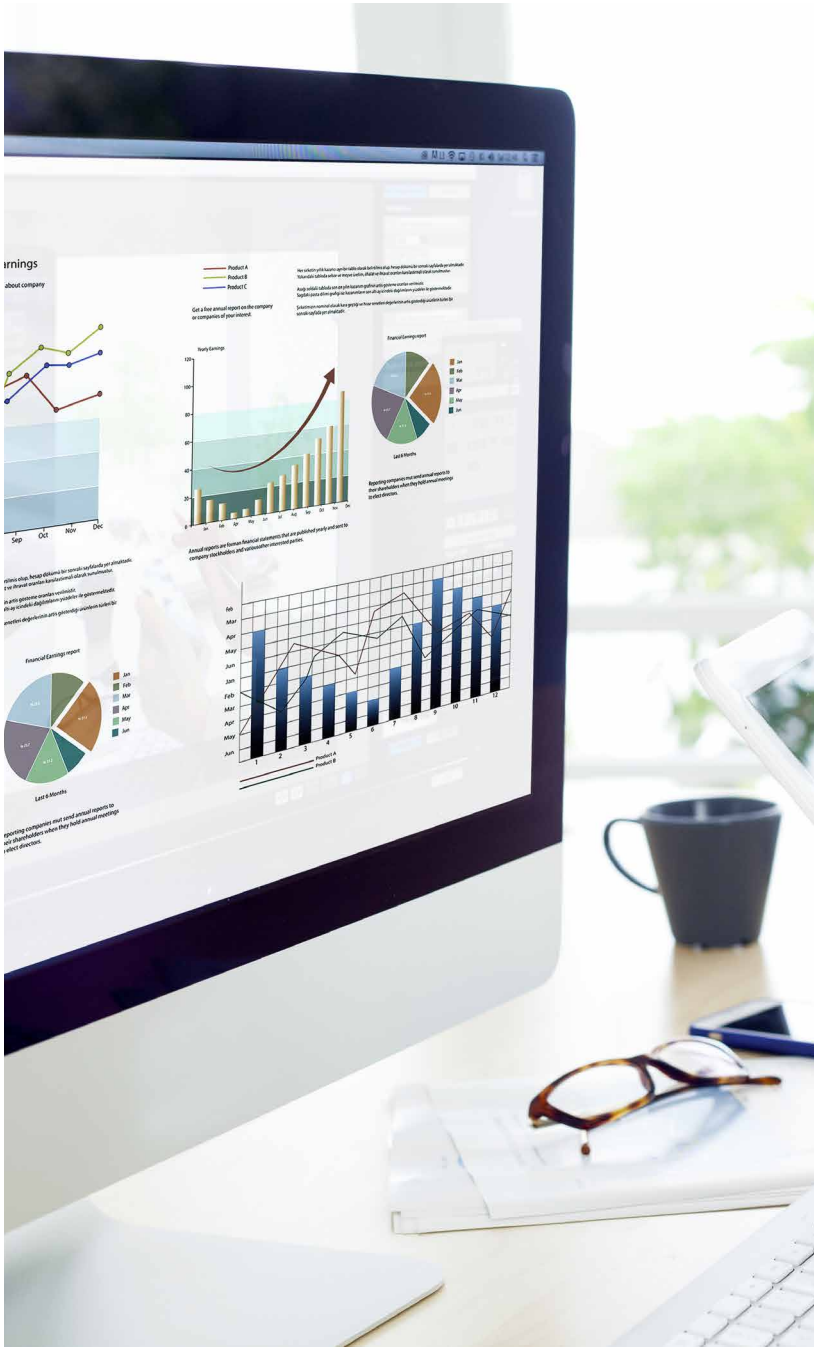
You will need to allow sufficient time for all aspects of your data submission process, from collecting and analysing data, collecting packaging and product weights, to the management of multi-site data submissions.

Data requirements vary considerably, from basic weight information (kilo per material) for your primary packaging, to line by line breakdown of all your packaging elements, measured by weight in grams and material type. You will need to check that your in-house data management systems can support these data requirements.

Schemes accept varying levels of data accuracy - a retailer with many product lines should ensure they can source weights information for as many of their range as possible in order to minimise the risk of non-compliance.

Data reporting frequencies can vary from scheme to scheme, with submissions ranging from annual, biannual, quarterly to monthly.

Once you have reported your data you must pay compliance fees based on these figures - costs and payment terms can differ considerably between schemes.



Other considerations.

What else should your company consider to comply?



Historial compliance?
Licensing symbols?
Green Dot symbol?

You must also ensure that all other obligations outlined for each set of requirements are met, for example, there may be take-back requirements for WEEE, consumer awareness requirements, or the requirement to display the recycling fee on a product label, packaging or documentation that is provided with the product at point of sale.

Many countries require historical compliance for any years where your company was obligated but not compliant. Failure to comply could result in legal action.

You will also need to consider printing and licensing symbols such as the Green Dot for each of the products you place in your destination markets.

The Green Dot symbol shows that a financial contribution must be made towards end-of-life collection and recycling of packaging, and is mandatory in four countries. In most other countries use of this symbol requires you to purchase individual licences.

In France the Triman symbol is used in addition to the Green Dot, illustrating how countries can implement their own marking requirements.

Case study.

This hypothetical case study illustrates the complexity of the obligations and licensing requirements a UK retailer must meet when selling online in 10 European countries.

The company is an online retailer with a UK head office. It delivers products to household end-users overseas directly from a UK warehouse.

It sells packaged goods including clothing, consumer electrical items such as hair dryers and products containing batteries, such as alarm clocks.

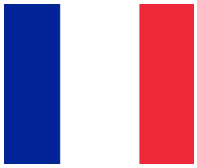
It has customers in 10 European countries and exceeds all thresholds (where applicable) for the packaging, WEEE and batteries regulations in each. Even though the company has no physical entities overseas, by selling online it is still obligated under each country's producer responsibility legislation.



Austria - Packaging declaration frequencies depend on compliance fee (monthly, quarterly or annual). Annual WEEE and batteries submissions are required. A licence agreement is needed for use of the Green Dot symbol.



Belgium - Annual packaging, quarterly WEEE and monthly batteries submissions are required. A licence agreement is needed for use of the Green Dot symbol.



France - Annual packaging, biannual WEEE and annual batteries submissions are required. A licence agreement is needed for use of the Green Dot symbol.



Germany - Annual packaging, monthly WEEE and batteries submissions are required. A licence agreement is needed for use of the Green Dot symbol.



Ireland - Monthly WEEE and batteries submissions are required. A licence agreement is needed for use of the Green Dot symbol.



Netherlands - Annual WEEE and packaging submissions are required. The battery submissions are due bi-monthly or quarterly. The Green Dot is not recognised.



Poland - Annual packaging, quarterly WEEE and batteries submissions are required. A licence agreement is needed for use of the Green Dot symbol.



Portugal - Annual packaging, quarterly WEEE and batteries submissions are required. A licence agreement is needed for use of the Green Dot symbol.



Spain - Annual packaging, quarterly WEEE and batteries submissions are required. The use of the Green Dot symbol is mandatory, and a licence is needed.



Sweden - Annual packaging and monthly WEEE and batteries submissions are required. A licence agreement is needed for the use of the Green Dot symbol.

Case study.

In total this hypothetical UK company must make 126 data submissions every year and register with 19 difference compliance schemes to meet its obligations.

Each country has different data reporting requirements for packaging, WEEE and batteries

Austria	Packaging	WEEE	Batteries
	A	D	G

Netherlands	Packaging	WEEE	Batteries
	A	D	E

Belgium	Packaging	WEEE	Batteries
	B	E	H

Poland	Packaging	WEEE	Batteries
	A	F	I

France	Packaging	WEEE	Batteries
	C	D	I

Portugal	Packaging	WEEE	Batteries
	A	D	G

Germany	Packaging	WEEE	Batteries
	A	D	I

Spain	Packaging	WEEE	Batteries
	C	D	J

Ireland	Packaging	WEEE	Batteries
	A (tones not KG)	D	G

Sweden	Packaging	WEEE	Batteries
	A	D	G

Key

A	Weight in KG per material type
B	Technical sheet per packaging type and total number of sales units
C	Total weight in grams broken down by product line and per material type
D	Weight in KG and number of units per category type
E	Number of units per category type
F	Weight in KG per category type
G	Weight in KG per chemistry type
H	Total units per chemistry type
I	Weight in KG and number of units per chemistry type
J	Weight in grams per chemistry type

Responsible sourcing.

How do you ensure your company is sourcing responsibly?

When operating on a global scale, responsible sourcing is key to minimising the risk of non-compliance.

It is important to demonstrate auditable due diligence for compliance across your supply chain.

In order to minimise your exposure to risk you will need to be aware of any gaps in information across your supply chains, and the corrective actions you will need to take.

You will need to ensure that you have communicated and shared information about existing, new and emerging legislation for REACH, the Modern Slavery Act and many other areas of global legislation.

Brand-identity and reputation are vital considerations for retailers in today's ever-evolving marketplace. Customers are more aware than ever of environmental concerns and the impact of the products they buy - so ensuring compliance should be a priority.



How can we help.

We can eliminate the administrative and resource-intensive burden of complying with environmental legislation overseas.

In addition to free advice - including webinars, seminars and one-to-one support sessions - we also provide a range of international compliance services to over 80 customers in 28 countries and offer services worldwide.

Our team of 13 dedicated account managers and technical experts have extensive knowledge on regulations and compliance in over 135 countries.

We can provide accurate and up-to-date information for wherever you are commercially active including about obligated products, thresholds for compliance, legal reporting, registration requirements, compliance choices available, data reporting requirements and financial obligations.

If you prefer, we can manage all of your international compliance obligations, allowing you to focus on other business priorities.

Our fully outsourced service includes reviewing and identifying your obligations, registering you with the appropriate parties, collating and submitting your data and monitoring emerging areas of legislation.

We can also provide staff training and technical advice.

For a help and advice needs please contact us.

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