



INDEPENDENT AUDIT REPORT - WEEE

Independent Audit Report – WEEE for the attention of the Directors / Owners of :

BUSINESS NAME : Overton Recycling Ltd.
SITE ADDRESS: Rufford Street , Lye , Stourbridge . DY9 7DD
CONTACT: Mr. D. Overton.
Tel: 01384 896660
E Mail:
CONDUCTED BY: M.Ruston – I.R.C.A Certification No. 01194967
AUDIT DATE : 31ST March 2010

COMPLIANCE PERIOD 3 : YEAR ENDED 31ST December 2009

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Audit conducted to the requirements of WEEE Regulations 2006 (Amended 2007) & current Environmental Agency guidance.



INCLUDEPICTURE

ISO9001 & ISO14001 Consultancy and Support.

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COMPANY BACKGROUND & SYSTEMS

APPROVAL TYPE : AATF (Large)

NATURE OF BUSINESS: The receipt , recycling & recovery of various WEEE categories.

EEE CATEGORIES TREATED : 1,2,3,4,5,6,7,9,10, Display Equip(11) & Cooling Appliances(12)
(Ref -WEEE Regs Schedule 1)

WEEE IDENTIFICATION: B2B & B2C

NUMBER OF SITES: 1 – Rufford Street , Lye. DY9 7DD.

APPLICABLE PERMITS / LICENCE / APPROVALS:

EA Permit No. 46202 (WML)
Large AATF Approval No. WEEE/AH0002ZS/ATF – valid 28/10/09
Hazardous Waste Producer – Registration No. AFK725 – expires 25/07/10
Waste Carriers License – EAN/937711 – expires 17/07/2010

AGREED PROTOCOLS:

Applying Defra SMW protocol for categorisation of Small Mixed WEEE collections from CA DCF's.

OPERATIONAL MANAGEMENT SYSTEMS & RECORDS IN USE:

Bespoke Windows based business management system – 'Fire Fox'
Hard Copy Sub – Contractor Licence / Approval details.
Hard Copy receipt / despatch tickets & Notes.
Hard Copy Consignment & Transfer notes.

Onsite weighing Equipment Calibration Records –

Titan 50,000 Kg weigh bridge - S/No. 150223 - Cert No. 15870 03/09/09

PRM 2000Kg scales – S/No. 134804 – Cert No. 15871 03/09/09

AUDIT SCOPE

SCOPE:

The assessment of Operator supporting records/documentation of the receipt & treatment of Category 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12 EEE, which has been produced in the UK during the compliance period; to confirm the correct identification, record and consistency of reported WEEE quantities (Tonnage).

TOTAL TONNAGE WEEE RECEIVED ON SITE– Compliance Period 01.01.09 - 31.12.09

Total Tonnage: 12,166.743 Tonnes (Fire Fox – receipt quantity – All WEEE receipts)

Total Tonnage Non Obligated : 428.288 Tonnes

Total Tonnage Obligated: 11,738.455 Tonnes

ISSUED EVIDENCE NOTE(S): (Ref Appendix 1)

<u>No. of Notes</u>	<u>WEEE Category(s)</u>	<u>Compliance Scheme</u>	<u>Qty</u>
4	1,2,3,4,6,7,9	Veolia ES Compliance	522.029T
6	1,2,3,4,9,7,9	Valpak	176.135T
14	1,2,3,4,6,7, 9,11,12	REPIC	5477.697T
8	1,2,3,4,6,7, 9,11,12	ERP UK	2623.207T
2	10,11	Nil Waste	124.600T
10	1,2,3,4,7,8,9	DHL WEEE Compliance	350.860T
4	10,12	Advantage Waste Brokers	94.100T

Total No. of Evidence Notes Issued: 48

Total Tonnage: 9,368.628 Tonnes

AUDIT METHODOLOGY (SAMPLING)

The methodology of the Audit in determining appropriate sampling of evidence, was based upon the records & information presented by the Operator and the requirement to ensure sufficient records were assessed to form opinion of the consistency / accuracy of issued Evidence Note quantities.

Examination of hard copy Evidence Notes issued during the compliance period, which were retained with supporting system reports (Fire Fox); presented full traceability to system & hard copy receipt records. Verification of all issued Evidence quantities against system recorded quantities was undertaken (ref – Appendix 1) and accuracy of system records verified against a sample of hard copy weight receipt tickets. (ref – Appendix 2)

EVIDENCE

The receipt of WEEE at site is well controlled and deliveries are verified against transfer / consignment notes for accuracy of waste descriptions , EWC codes & content. Loads are not accepted without correct documentation.

All loads are weighed by receipt staff and recorded on sequentially numbered Weigh Tickets; which detail gross / net weight , obligated or Non obligated WEEE , applicable WEEE category & if applicable breakdown of load by category or description. Larger appliance counts are also recorded. (Ref: Appendix 2)

Calibration of weighing equipment was evident in retained Calibration Certificates.

Weigh Tickets & supporting Transfer / Consignment documents are supplied to WEEE administrator for booking into WEEE recording system (Fire Fox).

Evident during Audit that receipt staff are closely monitored for the accuracy of their record keeping and anomalies are resolved immediately by WEEE administrator.

Receipt records are filed & retained following entry into WEEE system. Weigh tickets are referenced in system providing traceability to records and alternatively system recorded invoice numbers can provide traceability to records.

Quarterly returns & evidence notes are generated in the appropriate EA formats via internet access to reporting sites. Reported & Evidenced WEEE quantities are derived from system generated reports , which are retained with Evidence Notes on completion. System reports can be generated by WEEE category or by PCS receipts, for any given period.

Generated quarterly & monthly system reports were verified against all issued Evidence notes to confirm accuracy of Evidenced quantities. (Ref: Appendix 1)

The same system reports were utilised to sample the referenced supporting hard copy weigh tickets,(Ref: Appendix 2) to confirm the accuracy & validity of system recorded receipts. Associated waste transfer , consignment note & waste origins were also verified against these receipts.

Hard copy Quarterly Returns were maintained for each quarter of the compliance period, which detailed quantities despatched for further treatment. A selection of treatment facilities recorded in quarterly returns were verified for appropriate Permits & Licenses utilising records maintained on site.

Simms Metals , EWMS Ltd, Beaver Metals , CRT Recycling.

All out going WEEE / Materials are logged into system & reports generated by receiving facility / company in order to determine Quarterly Return figures. Records are maintained of supporting transfer & delivery documents. Utilising system reports a sample of transfer documents & receipt evidence was verified. Simms Metals , EWMS Ltd, Beaver Metals , CRT Recycling.

The vast majority of received WEEE is treated by the operator for the recovery of materials which are then despatched for further processing. A small amount of material only can not be subject to further processing and this is factored into the Evidence quantities issued. This is achieved by reporting into the system these quantities and a percentage reduction made on relevant WEEE categories.

Evidence of recovery rates applied to Evidence Note quantities is maintained with the Evidence notes as calculations on system reports.

An EA audit was reported by the operator to have taken place recently and no issues were reportedly raised. No evidence of the EA Audit was held by the Operator.

FINDINGS

The Operator received & treated a large amount of WEEE, the majority identified as Obligated, during the compliance period. The Obligated WEEE has been received from UK based DCF's & CA DCF's and is attributed to 7 compliance Schemes to which the Operator has contract. The operator receives & treats the majority of listed WEEE categories.

The Operator has an appointed WEEE Administrator who holds responsibility to the MD for the accurate recording & reporting of WEEE receipts & treatment. The WEEE administrator & management team ensure the correct recording & identification of WEEE by receiving staff.

Receipts of WEEE during the period were clearly identified as Obligated B2B or B2C. Weighing in tickets, accompanied by customer documentation & waste notes, had been accurately logged into the 'Fire Fox' system; providing an accurate record of the received weights. Verification of this process highlighted its efficiency, which provided a good basis on which to complete Quarterly Returns & issue Evidence Notes. The receipts of WEEE were also correctly logged into the system in appropriate Categories in accordance with schedule 1 of the WEEE regulations.

Sampled traceability to supporting receipt, transfer & consignment records was good and supporting documentation met requirements. Sampling of such records verified that WEEE receipts were from UK origin during the compliance period.

The verification of all issued Evidence Notes confirmed reported weights against those recorded by the system for received WEEE in each case, demonstrating consistency in reporting. The application of the Defra SMW Protocol was found to be correct and applied to the relevant categories of WEEE in line with the Defra /EA guidance. The reported Tonnage on issued Evidence Notes was not in excess of the total amount of received WEEE and had only been issued against UK obligated WEEE.

The reporting of WEEE sent for re processing / re use / recycling was supported by despatch records and records of receipt by 3rd parties; confirming reported quantities. The traceability of supporting records for despatched WEEE derived materials was adequate to demonstrate consistency of reporting. The Operator demonstrated compliance with Duty of Care requirements for despatched WEEE and maintains records of sub contractor Licence & Approvals.

ANOMOLIES/ IMPROVEMENTS

Whilst the retention & filing of supporting documentation is adequate and traceability possible; it is not quickly retrievable. It would be suggested that a system of retaining supporting documentation together traceable under the ticket number; would be beneficial for auditing purposes.

On summary of the reported Evidence quantities & system received quantities it would appear that some obligated WEEE recorded as received is not accounted for in Evidence notes.

EVALUATION

The system controls & staff diligence in identifying & recording received WEEE are effective in providing accurate records from which to report Quarterly Returns & Evidence Notes.

The audit has concluded that the systems and controls in place are sufficiently effective to demonstrate a consistency in the reporting and that Evidenced WEEE does not exceed that received at site.

REPORT SUBMISSION

The report should be submitted to the E.A. no later than 31/05/2010.

Reports can be submitted by E mail : WEEERETURNS@environment-agency.gov.uk

Or by post : Environment Agency
 Waste & Regulatory Service Team
 Quadrant 2
 99 Parkway Avenue
 Sheffield
 S9 4WG



INDEPENDENT AUDIT - WEEE CERTIFICATION

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For the attention of the Directors / Owners of :

Overton recycling ltd.

Rufford Street, Lye, Stourbridge. DY9 7DD.

Based upon the documents & records presented for audit on
31st March 2010

I confirm that Evidence issued by this site is consistent with
the amounts of UK Waste Electrical and Electronic
Equipment received at this site during the previous
compliance year.

Martin Ruston – Auditor
31st March 2010
IRCA Certification No. 01194967



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