

Consultation: Waste Prevention Programme for England: Towards a Resource Efficient Economy

Which? is the UK's consumer champion. As an organisation we're not for profit - a powerful force for good, here to make life simpler, fairer and safer for everyone. We're the independent consumer voice that provides impartial advice, investigates, holds businesses to account and works with policymakers to make change happen. We fund our work mainly through member subscriptions, we're not influenced by third parties and we buy all the products that we test.

Summary

Which? welcomes the opportunity to respond to this consultation on the Waste Prevention Programme for England: Towards a Resource Efficient Economy.

We strongly welcome the Government's aim to substantially reduce products becoming waste, and for more products to be reused, repaired, and remanufactured. We agree that product lifetimes can be improved through better product design and ease of repair, and are supportive of the Government's intention to make use of consumer information schemes to empower consumers to make more sustainable choices. We also welcome the focus on ecodesign for electronic and electrical products, as well as the Government's commitment to encourage a shift away from hard to recycle products and tackle food waste.

However, we believe that there are a number of key areas where the programme needs to be more ambitious in order to adequately address problems that Which? research has identified. In particular, we believe that improving product durability and extending the lifespan of smart products by tackling security and software obsolescence should also be included as key aims of the programme. Our key points and recommendations are as follows:

Product Design

- Which? welcomes the Government's proposal to introduce product design requirements relating to spare part provision and the potential to disassemble and repair.
- The Government should explore how to make repairs a more economical option for the consumer, as well as ensuring that professional repairers have easy access to spare parts and technical information. It is also essential that the length of time for which spare parts are available supports the expected product life-time.
- The Government should also work with industry to promote greater modular product design, where appropriate. Minimum durability requirements and encouraging

manufacturers to improve the length of warranties to better match the expected lifetime of products could also help to incentivise more durable product design. Minimum performance standards should also be considered.

- Which? supports the Government's intention to use consumer information schemes to enable consumers to better identify resource-efficient products, and we welcome the proposal to pilot rating schemes based on products' durability and repairability.

Refill of products

- The Government should explore whether action is needed to make sure that consumers are provided with the right information on refillable products.

Electrical and Electronic Products

- We support the Government's intention to introduce policies aimed at driving better ecodesign of electrical and electronic equipment (EEE) in order to improve product lifespans.
- Currently, inadequate update support for smart products is a barrier to reuse due to security concerns and leads to products being thrown away prematurely. The upcoming Product Security and Telecommunications Infrastructure Bill is an opportunity to mandate minimum security periods for smart products.
- To increase rates of reuse, the Government should explore the role of consumer information in the second hand market, as well as longer-term warranties.
- The Government should also explore incentives, product-level targets and consumer information in order to encourage increased rates of recycling of waste electrical and electronic equipment (WEEE).

Packaging, Plastics and Single use-Items

- Which? supports the Government's intention to encourage a shift away from hard to recycle and single-use products. Our research shows that there is currently a significant amount of packaging that is difficult for consumers to recycle.

Food

- Which? welcomes the Government's commitment to take action to tackle food waste. We agree that progress has been made, but an ambitious approach is still needed to influence business behaviour, as well as to support consumers to reduce the amount of food they waste, while also ensuring food safety.

Introduction

Which? is committed to bringing sustainability into everything we do, including through our advocacy, product testing and investigations. We therefore welcome this consultation on the Waste Prevention Programme for England: Towards a Resource Efficient Economy. Many of the areas covered have been a focus of our recent investigations, including how product



longevity can be improved, how consumers can be supported with better product information to help them make more sustainable choices, and how to support greater correct recycling.

We are responding to the following sections of the consultation:

Chapter 1: Introduction

Chapter 2: Designing out Waste: Ecodesign, Extended Producer Responsibility and Consumer Information

Chapter 3: Reuse, Repair, Refill, Remanufacture: Local services and facilities

Chapter 6: Textiles

Chapter 8: Electrical and Electronic Products

Chapter 10: Packaging, Plastics and Single-use Items

Chapter 11: Food

We have limited our response to those areas where we have most expertise and data to contribute at this stage.

Relevant Consultation Questions

Chapter 1: Introduction

Question 8: Do you agree or disagree with our choice of impacts and outcomes as the right goals for us to be aiming to achieve?

We **strongly agree** that the Government's choice of impacts and outcomes are the right goals to be aiming to achieve.

We believe that the rates of products becoming waste can be reduced by more durable design as well as ease of repair. The average washing machine is thrown away after less than six and a half years¹, but Which? survey analysis has shown that machines from the best brands can last for more than twenty years².

We strongly support the Government's ambition for more products to last longer as well as to be reused, repaired, and remanufactured, and believe that empowered consumers can play an essential role in helping to drive this transition alongside Government and industry. To achieve this, the Government must take seriously consumers' concerns and focus on tackling the barriers including cost of repair, inadequate software and security support for smart products, and lack of or inadequate sustainability information in the purchase pathway.

Question 9: Do you agree or disagree that our policy approach covers all the areas for action that are needed?

¹ Which?, [Introducing our Eco Buy commitment](#), online, November 2020

² Which?, [How long should you expect your large kitchen appliances to last?](#), online, December 2020

We **disagree** that the Government's policy approach covers all the areas for action that are needed. As well as seeking to increase the reuse, repair, and remanufacture of products, improving product durability should also be a key aim for the Government. Surveys have consistently shown that consumers are concerned about product durability and are interested in buying goods that are durable and will last. For example, the Green Alliance reports that 65% of people 'often feel frustrated about how long products last'³. However, research shows that the average lifespan of many everyday products is becoming shorter⁴.

Improving product durability will help consumers to keep products for longer, and is essential to minimising waste and reducing the environmental impact caused by manufacturing new products. This is important given that the production of some products such as mobile phones can account for more than two-thirds of the emissions over their lifecycle⁵.

We urge the Government to explore what measures will be most effective in improving the durability of products, and to consider this as a key aim of the Waste Prevention Programme for England.

Another significant barrier to longer product lifespans and greater reuse and remanufacture of smart products in particular is inadequate software and security update support, which raises security concerns and leads to products being thrown away prematurely as well as limiting consumers' demand in the second hand market. Tackling this should also be a key aim for the Government, and we recommend that this could be achieved by setting mandatory minimum software and security update periods for smart products. This is discussed further in our response to Chapter 8 - Electrical and Electronic Products.

Chapter 2: Designing out Waste: Ecodesign, Extended Producer Responsibility and Consumer Information

Question 10: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

We **agree** that the measures described are likely to achieve the overall aim set out at the beginning of this chapter. We strongly support the Government's aim to drive change in product design so that products are made to be more durable, repairable and recyclable, and can be remanufactured where appropriate.

Design requirements: Ecodesign regulations for Energy-Related Products

Which? has supported the Government's intention to introduce new ecodesign and energy

³ Green Alliance, [By popular demand: what people want from a resource efficient economy](#), 2018

⁴ Research by Öko-Institut e.V. and Bonn University, commissioned by the German Environment Agency, [Lifetime of electrical appliances becoming shorter and shorter](#), 2016

⁵ Apple, [iPhone 11 Product Environmental Report](#), 2019. The report states that 79% of the iPhone 11's lifecycle carbon emissions were created in production, 3% in transport, 17% during use, and less than 1% in end-of-life processing.

labelling regulations for washing machines, dishwashers, household refrigerating appliances and electronic displays.

We believe that the ecodesign and energy labelling regulations should be strengthened as well as expanded to include more appliances. In our response to the Government's call for evidence on energy-related products (attached), we recommended that the Government should investigate the costs and benefits of widening the regulations to include gas hobs, microwaves and kettles, and we reiterate this recommendation.

In our response to the Government's consultation on the Draft Ecodesign and Energy Labelling Regulations 2021, we also identified a number of opportunities to improve resource and energy efficiency further for a number of products, with a focus on improving the durability and reparability of these products. These were as follows:

Dishwashers

Future regulations could consider the benefits of reducing energy consumption needed to dry dishes. For example, the dishwasher door could automatically open after the wash is complete, reducing the amount of energy needed for the drying cycle.

Washer-Dryers

The energy and water efficiency of washing machines has substantially improved since the introduction of the ecodesign regulations. Yet, washer-dryers have not made the same improvements. Our tests show that washer-dryers wash more poorly and take much longer to dry clothes than the dedicated equivalent machines. Washer-dryers are also more likely to develop faults more quickly than either washing machines or tumble dryers. There may therefore be a role for further regulations to help improve washer-dryer performance and efficiency more quickly.

TVs

Future regulations could improve access to spare parts for the most common faults. We were surprised that screens were not one of the required spare parts in the draft Ecodesign and Energy Labelling Regulations 2021. Our data has found that 35% of all faults relate to the display and picture⁶.

Fridge/Freezers

We were also surprised that the compressor was not on the list of potential spare parts in the draft Ecodesign and Energy Labelling Regulations 2021. This is a key component for the functioning of a fridge/freezer. In future, there may be merit in assessing the possibilities of making a compressor a spare part. We recognise this would include the feasibility of replacing it from both a reparability and cost perspective.

Design requirements: Industry standards

We are interested in the Government's proposal to encourage industry to set their own product design standards. We would welcome further information as to how the Government

⁶ Which?, [Which TV brand to buy in 2021](#), online, May 2021

would ensure that these standards were kept under review to ensure they remain up to date and effective, and the oversight measures that would be put in place to ensure compliance.

Design requirements: Repairability

Which? welcomes the Government's proposal to introduce product design requirements relating to spare part provision and the potential to disassemble and repair. We believe that making repair easier and cheaper is essential to helping consumers keep their appliances working for longer and reducing the environmental harm of replacing them.

While there is some evidence of a growing consumer interest in repair and recycling, we know that in reality, repair rates remain relatively low, and practical and cost barriers can interrupt consumer intentions to repair. This is despite the fact that according to our survey data, appliances breaking down is a major reason why products are discarded and replaced - 60% of consumers replaced their washing machines because they broke down, and 49% of consumers replaced their dishwashers because they broke down⁷.

Which? research has found that the key barriers currently preventing more consumers from getting their products repaired include cost and a lack of confidence that products can be repaired. In a November 2020 survey of Which? members whose appliances had developed a fault in the last three years, we found that 50% of respondents replaced the appliance, 30% got a professional to repair it, 13% fixed it themselves and 7% did nothing and continued to live with the fault⁸.

Of those that replaced their appliance, when asked why, 34% said the main reason they didn't repair it was because they thought it couldn't be fixed, 32% said it would have been too expensive to fix, 14% wanted a new model, 4% wanted new features, and 2% said it would take too long to repair⁹.

Which? is also currently conducting research into the products which are typically replaced compared with those which tend to be repaired. Our initial findings have shown that the products which are currently more likely to be replaced, rather than repaired, are small domestic appliances, including kettles, toasters, irons and microwaves, whereas cooking appliances are more likely to be repaired¹⁰.

One reason for this could be that repair can be less economical for consumers than replacing the product. Research by Product Lifetimes and the Environment (PLATE) found that while repairing a washing machine would make sense ecologically as the production process is particularly energy and resource intensive, it was not financially worthwhile for the consumer. According to PLATE, 'a washing machine needs on average two repairs in fifteen years. Typical repairs cost so much that in the long run a new purchase is only slightly more

⁷ Which? reliability survey, August - September 2020. 13,274 Which? members were asked about their appliances between 27 August and 24 September 2020. Sample size for reason for replacement previous product: 5402 dishwasher and 8214 washing machines.

⁸ Which?, "Common Appliance Faults: Repair or Replace?", print, March 2021

⁹ Which?, "Common Appliance Faults: Repair or Replace?", print, March 2021

¹⁰ Which? internal research, 2021

expensive than the repairs¹¹. Similarly, the production of dishwashers requires a significant amount of energy and resources, but repairing a dishwasher rather than buying a new one only made financial sense for expensive models. As such, the report concluded that action was needed to 'enlarge profitability of repairs [sic], so that financial decisions of consumers are more often in line with environmental benefits.'¹²

We agree that the Government should explore how to make repairs a more economical option for the consumer. Our own research has found that consumers could be expected to pay up to £316.44 to repair an iPhone display, while for the same price the consumer could buy a new Which? Best Buy smartphone.¹³

In order to make repairs more economically attractive, and to give consumers more confidence that their appliances could be repaired, consumers must have easy and, crucially, affordable access to professional, competent repairers. The Government should also explore whether initiatives are needed to make repairs a more affordable option for consumers.

And where repairs are safe to be undertaken by users themselves, the Government should explore how to make sure that manufacturers are providing clear and accessible guidance on simple troubleshooting so that users can be empowered to undertake repairs themselves. A recent Which? investigation showed that many of the most common appliance faults could be repaired by the user if they had the right knowledge and information¹⁴.

Design requirements: Access to Spare Parts

Which? supports the Government's proposed policy of setting requirements on access to spare parts to promote greater repair and improve product lifetimes. It is important that technical information is also included so that repairers have easy access to the technical information required to fix faulty appliances safely.

As we explained in our response to the Government consultation on the Draft Ecodesign and Energy Labelling Regulations 2021, it is essential that the length of time for which spare parts are available supports the expected product lifetime. For example, our data shows that refrigeration appliances have a mean lifetime of between 20-25 years; a typical dishwasher's lifespan is 18 years; the median lifetime of a washing machine is 15 years; and a TV's median estimated lifetime is 13 years¹⁵. In order for regulations to be effective, it is essential that spare parts are available for a similar length of time.

It is also important that consumers have a choice about their professional repairer in order

¹¹ Schick, P. et al, Product Lifetimes and the Environment, "Repair or Replace? Is it worth repairing an old device from a consumer perspective?", September 2019

¹² Schick, P. et al, Product Lifetimes and the Environment, "Repair or Replace? Is it worth repairing an old device from a consumer perspective?", September 2019

¹³ Which?, [How to Repair your Smartphone](#), online, June 2021

¹⁴ Which?, 'Common Appliance Faults: Repair or Replace?', print, March 2021

¹⁵ Which? reliability survey, August-September 2020. The survey asked 13,274 Which? members about their appliances between 27 August and 24 September 2020. This covered 5,277 Dishwashers, 2,819 fridges, 4,812 fridge-freezers, 7,008 washing machines and 12,445 TVs.

to establish effective competition in the repair market. In the draft Ecodesign and Energy Labelling 2021 regulations, manufacturers act as the gatekeepers to restricted spare parts and technical information, and professional repairers need to register with each manufacturer in order to access the information and parts they need for their business. We recognise that the Government's aim is to support safe repair, but we believe that care also needs to be taken to ensure that this and any future regulations do not restrict competition. As such, we have recommended that the risk that some professional repairers could find it difficult to access the spare parts and technical information should be monitored.

Design requirements: Alignment with consumer rights and warranty periods

It is also essential that the Government works with industry to ensure that any future product requirements, particularly on spare parts and technical information availability, align with consumer rights and warranty periods, to make sure that consumers have the necessary consumer protection to fix broken appliances.

Our durability data indicates that appliances could break and need to be repaired after a year. For example, our data indicates that 5% of washing machines develop a fault within the first year, and this increases to 7% in the second year¹⁶. Yet, the draft Ecodesign and Energy Labelling 2021 regulations require spare parts and technical information to be made available within two years of an appliance going on sale.

In a worst case scenario, an appliance could break and need fixing after a year, but no spare parts or technical information are available to professional repairers. This could mean that consumers are restricted in who they can use to repair their appliance, or the appliance is unable to be repaired.

Under the Consumer Rights Act, consumers have a number of tiered rights on getting a faulty product fixed or replaced. For the first 30 days, if a product becomes faulty they can ask for a full refund, replacement, or repair. After 30 days and up to six months they have the right to have their faulty product repaired by the retailer if a fault occurs. And if repair is unsuccessful the consumers have the right to ask for a replacement (or a refund). Consumers do have rights for up to six years after purchase (five years in Scotland), but this is more difficult, as they have to prove the product was not of satisfactory quality.

Large appliances like dishwashers and washing machines also come with a manufacturer's warranty, which promises to repair and sometimes replace a broken appliance within one to two years after purchase. We examined the guarantee and warranty policy of twelve appliance manufacturers and found that seven manufacturers offered a standard one year warranty.

Therefore, some consumers could find that their guaranteed access to the required spare parts and repair information ends after twelve months. This could create a consumer

¹⁶ Which? reliability survey, August-September 2020. The survey asked 13,274 Which? members about their appliances between 27 August and 24 September 2020. This covered 5,277 Dishwashers, 2,819 fridges, 4,812 fridge-freezers, 7,008 washing machines and 12,445 TVs.

protection gap for the second year, until the manufacturer makes the spare parts and technical information available. As such, we urge the Government to work with industry to ensure that consumers have the necessary consumer protection to fix broken appliances.

Design requirements: modular design

The Government should also encourage companies to design products in such a way that component parts such as batteries, which often acquire faults, can be more easily repaired or replaced. For example, smartphone batteries are often permanently fitted, which limits the ability for users and third party repairers to disassemble the devices. However, a survey of Which? members in July 2020 covering 12,661 smartphones found that battery problems accounted for 20% of all smartphone faults¹⁷.

A Which? investigation has also found that this issue affects many cordless appliances, some of which are designed with non-replaceable batteries, forcing obsolescence linked to battery life when nothing else may be wrong with the appliance. According to our annual reliability survey, battery failure is one of the most common reasons why cordless products stop working, accounting for 52% of the reported faults with cordless hedge trimmers and 34% of the faults experienced with cordless vacuum cleaners¹⁸.

To address these issues, the Government should work with industry to promote greater modular product design, which would improve repairability by making products easier to disassemble and repair.

However, it is very important that any potential trade offs are carefully considered on an individual product level, as product design requirements may in some cases affect the functionality of devices. For example, although the use of adhesives and embedded batteries limits the ability to disassemble smartphones, as mentioned above, this can be what is required in order to make smartphones resistant to water damage. It is very important therefore that the right balance is struck, as consumers will be more likely to replace products where they aren't satisfied with their functionality.

Design requirements: durability

Alongside repairability, it is also important that products are designed and manufactured to last for as long as possible in order to minimise the environmental harm caused by replacing them.

Product durability has noticeably declined in recent years, with research demonstrating that the share of large household appliances which had to be replaced within less than five years due to a defect increased from 3.5% to 8.3% between 2004 and 2013.¹⁹ Some products seem to have particularly poor durability - for example, a consumer survey by the Spanish consumer organisation OCU 47% of smartphone failures were reported to occur in the first two years of

¹⁷ Which?, [Most Reliable Mobile Phone Brands](#), online, May 2021

¹⁸ Which?, [Built to fail? The hidden cost of your cordless gadgets](#), online, February 2020

¹⁹ Research by Öko-Institut e.V. and Bonn University, commissioned by the German Environment Agency, [Lifetime of electrical appliances becoming shorter and shorter](#), 2016

use²⁰.

To make it easier for consumers to buy products that are likely to be more durable, the Government should explore how to make sure that clearer upfront information on expected/typical product lifespans or other indicators of durability is provided to consumers. This is discussed further in the section 'Consumer information: Durability and Repairability Information', below.

The Government could also explore setting minimum durability requirements within product design regulations. We have previously recommended in our response to the Government call for evidence on energy-related products that minimum durability standards should be introduced for some cooking appliances and kettles in order to increase the time before a fault develops and improve the lifespan of the product.

Encouraging manufacturers to improve the length of warranties to better match the expected lifetime of products could also help to incentivise more durable product design. For example, many boiler manufacturers offer ten year warranties or guarantees, whereas washing machine warranties often cover just one to two years²¹. Research has previously found that consumers are positive about initiatives such as extended warranties to extend the usable lives of their products²², and the Government should explore this further.

Design requirements: Performance standards

While we strongly welcome Government action to set product design requirements including on durability and repairability, in order for products to be sustainable they must also be able to perform their primary function well. For example, Which? testing of washing machines found that some energy efficient washing machines performed poorly at washing clothes.

Ultimately, if a product does not perform well we can reasonably assume that it is more likely that it will be replaced in a shorter time frame, which will undermine efforts to promote durability, reuse and repair. This is why at Which?, products awarded with our 'Eco Buy' status must perform well overall in core Which? tests, as well as being reliable, repairable, and energy and water efficient.

As such, we recommend that the Government should consider setting minimum performance standards within product design requirements, to give consumers the assurance and confidence that the product they buy is effective.

Supporting consumers with information

Which? supports the Government's intention to use consumer information schemes to enable consumers to identify resource-efficient products and purchase more sustainably.

²⁰ Consumer survey published by OCU (2018), cited in "[Durability of smartphones: A technical analysis of reliability and repairability aspects](#)", by Mauro Cordella, Felice Alfieri, Christian Clemm, and Anton Berwald, 2021.

²¹ Which?, [How long should your washing machine last?](#), online, July 2014

²² CIEMAP, [Resource Efficiency and the Circular Economy: What do the public think?](#), 2018

Which? research shows that energy use, product longevity and repairability are the key factors which consumers consider when seeking to make a 'sustainable' purchase, and these are common amongst most product categories, including cars and large domestic appliances²³. For some non-energy-using products, such as mattresses, consumers reported considering the materials and how easily recyclable the product was.

As such, the Government should consider how to make energy information more widely available across more product categories, and explore how to make information on durability, repairability, material content and recyclability more accessible. Which? is currently carrying out additional research into this, in order to find out more about the sustainability factors consumers take into account when making a purchase. We will be happy to share the results and analysis with the Government when we are in a position to do so.

Crucially, any new or reformed consumer information scheme must be able to help consumers make informed decisions, and we believe that all schemes should be subject to consumer testing to ensure high levels of consumer understanding and credibility.

It will also be important to ensure that any information that is provided in addition to information that is already provided - for example, energy efficiency information on labels - does not cause confusion for consumers and undermine the aim.

Consumer information: Energy efficiency information

As well as exploring what additional information could be useful for consumers, the Government should also explore expanding and improving existing schemes such as the energy label. As mentioned above, we believe that the ecodesign and energy labelling regulations could be expanded to include more appliances such as gas hobs, microwaves and kettles.

Supplying consumers with information on the energy efficiency of products has been shown to be successful in driving consumers to consider more sustainable purchases. For example, our research shows that the majority of our members consider the amount of energy an appliance uses when making a purchasing decision. Specifically, we found that 89% of our members considered energy usage when purchasing a dishwasher, 87% when purchasing a fridge/freezer and 71% when buying a TV²⁴.

In order to provide reliable information, it is important that the energy efficiency of products is tested using methods that reflect the way consumers typically use the products in real life. Which? has previously raised concerns that tests may not reflect how the consumer uses the product in reality, and as a result, the ratings given could mislead consumers. For example, the new energy efficiency labels for washing

²³ Which? internal research

²⁴ Which? internal research

machines are based on long-cycle programmes rather than a blend of the programmes that consumers use. In order for ratings to give a true reflection of the efficiency of the product and not mislead the consumer, the Government should ensure that the testing methods are based on how consumers really use the products.

The Government could also explore the merits of expanding the current energy labels to cover energy and resource use and emissions across the product life cycle, as for many products their greatest environmental impact occurs during the production stage. For example, for smartphones up to 80% of their overall carbon impact is from the production stage, but there is currently little information presented in the consumer purchase journey about material sourcing and production impacts.

Consumer information: Durability and Repairability information

We support the Government's proposal to pilot rating schemes based on products' durability and repairability. We have previously suggested this information could be provided alongside energy efficiency information on the energy label.

We know that consumers are interested in how repairable appliances are when deciding which product to buy. Research commissioned by the EU Commission found that consumers are likely to buy more repairable products and are willing to pay more for this. For example, consumers were found to be willing to pay €83-105 more for an improved repairability rating for dishwashers²⁵.

We agree that there is merit in exploring whether providing repairability information would be useful. As part of this, we would encourage the Government to investigate the impact of the repairability indicator which has recently been introduced in France in order to draw any relevant conclusions for the UK²⁶.

Providing durability information has also been shown to help consumers engage with the sustainable economy. Survey-based data consistently suggests that a majority of UK consumers care about how long goods last²⁷, but there currently isn't an easy way for consumers to assess durability. Indeed, EU-commissioned behavioural research found that consumers find it difficult to find and access the information and use proxies as a result. However, they found that if durability information *was* provided then consumers would use this to inform their purchasing decisions, and were almost three times more likely to choose products with the highest durability on offer²⁸.

We therefore support the Government's intention to explore durability information schemes, which could include information on expected/typical product lifespans as well as other indicators of durability.

²⁵ EU Commission, [Behavioural study on consumers engagement in the circular economy](#), October 2018

²⁶ See: [Decree n ° 2020-1757 of December 29, 2020 relating to the repairability index of electrical and electronic equipment](#)

²⁷ Green Alliance, [By popular demand: what people want from a resource efficient economy](#), 2018

²⁸ EU Commission, [Behavioural study on consumers engagement in the circular economy](#), October 2018

Consumer information: Information on water use

The Government could also explore providing information on water use that will help consumers to choose water efficient appliances. This should be tested with UK consumers to ensure the additional information is helpful.

Chapter 3: Reuse, Repair, Refill, Remanufacture: Local services and facilities

Question 11: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

We **neither agree nor disagree** that the measures described are likely to achieve the overall aim set out at the beginning of this chapter.

Which? welcomes the Government's commitment to take action to promote greater refill of products. We have already been urging supermarkets and manufacturers to make refillable products more widely available to customers, as a Which? survey of 2000 members of the public found that only a third of shoppers have actually seen refillable products on sale. However, a huge three-quarters of shoppers said that they were open to buying them²⁹.

As part of the Government's work to facilitate greater refill of products, the Government should explore whether action is needed to make sure that consumers are provided with the right information on refillable products so that they can make informed choices. In our survey, 29% said that difficulty finding refillable products was the main reason they had not purchased any in the last year³⁰.

The current inconsistency in labelling is a significant barrier. Earlier this year, Which? analysed twelve popular refillable home cleaning and personal care products, and found that nine of the twelve original products didn't have any labelling to highlight that they were refillable, and five of the twelve products lacked labels to inform customers whether the packaging of the original or refill was recyclable³¹.

Chapter 6: Textiles

Question 14: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

We **neither agree nor disagree** that the measures described are likely to achieve the overall aim set out at the beginning of this chapter.

²⁹ Which?, [How to buy refillable products](#), online, April 2021

³⁰ Which?, [Manufacturers and supermarkets must do more to help consumers join refillable revolution](#), online, April 2021

³¹ Which?, [Manufacturers and supermarkets must do more to help consumers join refillable revolution](#), online, April 2021

Which? is currently conducting research into the longevity of clothing and the use of chemicals in the textile industry. We expect the results of our tests to be available by September 2021 and will be happy to share these with the Government.

Chapter 8: Electrical and Electronic Products

Question 16: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

We **disagree** that the measures described are likely to achieve the overall aim set out at the beginning of this chapter. Whilst we support many of the Government's proposals, we believe that security and software updates for smart products should be a key part of the Government's approach to extending electrical and electronic product lifespans and promoting greater reuse and remanufacture.

Design Requirements: Electronic and electrical products

We support the Government's intention to introduce policies aimed at driving better ecodesign of EEE. Prolonging the lifespan of these products is particularly important because production of some of these items can account for more than two-thirds of the emissions over their lifecycle. For example, as mentioned above, research has found that up to 80% of the greenhouse gas emissions of smartphones occurs during the production stage³².

Security and software updates for smart appliances and products

Currently, inadequate security and software update support for smart electrical and electronic products leads to products being thrown away or replaced prematurely, and is a barrier to reuse due to security concerns.

Recent Which? research has found that smartphones from brands like Apple, Samsung and Huawei are capable of lasting six years or more before they need replacing due to faults or issues with performance³³. However, in many cases software update cycles fall far short of this, with some brands only guaranteeing security updates for two years³⁴. Without vital updates to keep products safe for as long as consumers reasonably expect to be able to use them, they are at risk of being thrown away prematurely and adding to the growing electronic waste problem. Consumers may also be reluctant to engage with second hand products if they are out of support, as this could put them at risk from hacking and other safety issues.

Which? supports the Government's recent commitment to take action to tackle this issue, and we believe that the upcoming Product Security and Telecommunications Infrastructure Bill is an opportunity to mandate minimum security periods for smart products, alongside the proposed transparency of support period requirements.

³² Greenpeace, [Guide to Greener Electronics 2017](#), online, October 2017

³³ Which?, [Mobile phone brands putting customers at risk with inadequate update support](#), online, December 2020

³⁴ Which?, [Mobile phone brands putting customers at risk with inadequate update support](#), online, December 2020

Policies aimed at encouraging more reuse of Electronic and Electrical Equipment (EEE)

In order for reuse and remanufacture initiatives to be effective it will be essential to get consumer buy-in. Research shows that up to 50% of electrical device users would be willing to have used or refurbished products under the right conditions³⁵, but many are still put off. Reasons given include worries about how well a refurbished device will work, and perceived financial risk, as well as feeling uncertain about the safety, hygiene or quality of second hand or refurbished products. Such concerns have been identified as important barriers to green purchasing and the promotion of reuse³⁶.

Some manufacturers are starting to address some of these concerns - for example, some companies are offering warranties for remanufactured products which are the same as for new products³⁷.

The Government should also explore how to address these barriers and promote best practice within the industry, and we welcome the Government's intention to consider the role of longer-term warranties in promoting design for durability, which could also be used to promote greater reuse. And alongside developing proposals to provide consumers and businesses with information on the durability, repairability and recyclability of the products they buy, the Government should also look at improving consumer information and transparency in the second-hand market, which could offer more assurance and give confidence to consumers.

There is also an important role for manufacturers, who by actively marketing and promoting refurbished products to consumers, alongside competitive pricing, could seek to make them equally as desirable as a new device.

Work towards improving systems of collection of WEEE for repair and reuse

It is important for the Government to consider that as devices become smarter and more complex, they are also becoming more complex to repair. For example, the increasing use of software within smart washing machines and other products will require third party repairers to acquire new technical knowledge in order to undertake repairs. This is why it is important for manufacturers to be transparent with information so that repairers are able to undertake these repairs.

³⁵ WRAP, [Switched on to value: Powering business change](#), 2017 cited by Ellen MacArthur Foundation, [Circular Consumer Electronics: An Initial Exploration](#), 2018

³⁶ Zero Waste Scotland, [Procuring for: Repair, Re-use and Remanufacturing](#), 2016

³⁷ Ellen MacArthur Foundation, [Towards the Circular Economy](#), 2013. "Ricoh, provider of managed document services, production printing, office solutions and IT services, is another Fortune 500 company, active in 180 countries. It developed 'GreenLine' as part of its Total Green Office Solutions programme, which aims to minimise the environmental impact of products at its customers' sites. Copiers and printers returning from their leasing programme are inspected, dismantled, and go through an extensive renewal process - including key components replacement and software update - before re-entering the market under the GreenLine label with the same warranty scheme that is applied to new devices."

It will also be important for the Government and industry to assess whether there are enough repairers with the right technical skills to be able to meet the desired increased demand for repairs.

Policies aimed at increasing collections of consumer and business WEEE

As the Government will be aware, the UK has consistently missed its annual WEEE collection targets in recent years³⁸, which suggests that despite efforts to ensure WEEE is collected, consumers are still not sufficiently informed or motivated to recycle. This was borne out in a 2019 survey of UK adults, which found that 51% of UK households have at least one unused electronic device at home. Of these, only 18% said they intended to recycle the item(s), whereas 69% intended to store them as a spare³⁹.

More than one in three of the people with unused devices at home cited data and security concerns as a key reason why they don't recycle old devices⁴⁰, which shows that tackling these concerns will be important if consumers are to feel confident that their data is secure when engaging in circular economy models.

Furthermore, as the Government identifies, there is a lack of consumer awareness about what to do with unwanted electronics, and this is reflected by the further 29% of people who reported not knowing where to go to recycle old tech. Significantly, 59% also said that knowing that some elements in mobile devices contained toxic and rare elements would make them more likely to recycle⁴¹. As such, the Government should also explore the role of product-level targets, consumer information and incentives in encouraging increased rates of recycling of WEEE.

As part of this, the Government should explore mandating requirements to display information about take-back services and how consumers can reuse and recycle electrical and electronic equipment on the energy label. This would need to be subject to consumer testing to ensure the additional information does not cause confusion to consumers.

It is important to note that there is currently an issue of transparency with take-back schemes, as these schemes are often positioned as a retailer benefit even though they are required by the WEEE directive, and this could be misleading for consumers. Retailers therefore need to be more transparent with consumers about their legal obligations. This is something the Government should consider when exploring such a consumer information scheme.

Chapter 10: Packaging, Plastics and Single-use Items

³⁸ Resource, [WEEE Collection Rates Fall as UK Misses Annual Targets](#), March 2021

³⁹ Royal Society of Chemistry, [Elements in Danger](#), January 2019. Research carried out by Ipsos MORI on behalf of the Royal Society of Chemistry.

⁴⁰ Royal Society of Chemistry, [Elements in Danger](#), January 2019. Research carried out by Ipsos MORI on behalf of the Royal Society of Chemistry.

⁴¹ Royal Society of Chemistry, [Elements in Danger](#), January 2019. Research carried out by Ipsos MORI on behalf of the Royal Society of Chemistry.

Question 18: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

We **neither agree nor disagree** that the measures described are likely to achieve the overall aim set out at the beginning of this chapter. Importantly, we believe that the barriers to correct recycling, where items are currently able to be recycled but in many cases aren't, should also be addressed.

Please note that we have also responded separately to the Government consultation on Extended Producer Responsibility for Packaging (attached).

Which? supports the Government's intention to encourage a shift away from hard to recycle and single-use products. Currently, there is a significant amount of grocery packaging that is difficult for consumers to recycle due to the items not being recyclable in household collections. In 2018, we investigated 27 items from each of the 10 major supermarkets, and we found that up to 29% by weight was not recyclable in household collections, with no practical need for this type of packaging in some instances⁴². In 2020, we researched the packaging of 89 popular branded groceries, and found that only a third had packaging that was fully recyclable in household collections⁴³.

As well as taking action to encourage a shift away from hard to recycle products, the Government should also address the barriers to correct recycling where items could be recycled but often aren't. Which? surveyed 2,155 members of the general public in May 2018, and found that while most did want to reduce the amount of plastic waste they create, it wasn't always easy or clear how to do so. In some cases, recycling facilities existed, but people didn't know about them. For example, only 46% knew that plastic bags could be recycled at supermarket collection points up and down the country⁴⁴.

Incorrect or nonexistent labelling on packaging is currently a significant problem preventing consumers from recycling correctly. For example, Which? research has found that incorrect labels are commonplace in supermarkets - our investigation revealed that 42% of the packaging we analysed was labelled either incorrectly or not at all. Iceland, for example, had only correctly labelled 38% of the packaging, but we found mistakes in how products had been labelled in all eleven of the major supermarkets we investigated⁴⁵.

It is also important to address the current confusion consumers feel towards the various recycling and recyclability symbols, which can act as a barrier to correct recycling. A Which? survey in 2018 found that only 32% of respondents correctly understood the PET symbol⁴⁶. For items labelled with the Mobius Loop, only 9% said they would check their local recycling rules before sorting packaging with this symbol, whereas 45% said they would put these items straight into mixed recycling, despite items with this symbol not necessarily being accepted in all recycling schemes.

⁴² Which?, How to use less plastic and help save the planet, print, August 2018

⁴³ Which?, Big brands exposed on packaging, print, October 2020

⁴⁴ Which?, How to use less plastic and help save the planet, print, August 2018

⁴⁵ Which?, What are supermarkets doing to wrap up the plastics problem?, print, July 2019

⁴⁶ Which? "Not yet recycled": The challenges of plastic recycling', print, August 2019

For the 'Check locally' On-Pack Recycling Label (which is now being phased out), while 42% of people said that they'd check local recycling if they saw this symbol, 19% said they would put these items in with their mixed recycling without checking local recycling rules. We also found that consumers were confused by the Green Dot symbol, with 41% saying they would put packaging that displays this symbol straight into mixed recycling, whereas the symbol doesn't necessarily mean that the packaging is recyclable at all, and a significant 32% answered "don't know"⁴⁷.

The Government should implement a single mandatory recycling labelling scheme, so that consumers know what can and can't be recycled, and how. The Government should also explore how to improve consumer awareness of the recycling facilities which are available.

Chapter 11: Food

Question 19: Do you agree or disagree that the measures described are likely to achieve the overall aim set out at the beginning of this chapter?

We **neither agree nor disagree** that the measures described are likely to achieve the overall aim set out at the beginning of this chapter.

Which? welcomes the Government's commitment to take action to tackle food waste and the initiatives that are proposed in the consultation document. We agree that progress has been made, but an ambitious approach is still needed to influence business behaviour, as well as to support consumers to reduce the amount of food they waste, while also ensuring food safety.

A recent Which? survey found that while consumers are largely unaware of the extent to which their food choices can negatively impact the environment, a fifth of respondents identified food waste as one of the biggest negative impacts. Interestingly, we also found that the COVID-19 pandemic has meant that 37% of those surveyed feel that reducing food waste is now a bigger priority for them. This suggests that there could be a significant opportunity to engage consumers in the need to act on food waste in the current moment, provided that they are supported by businesses and by the government⁴⁸.

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⁴⁷ Which? "'Not yet recycled': The challenges of plastic recycling', print, August 2019

⁴⁸ Which? survey, 30 April - 2 May 2021, sample size 3619, data weighted to be representative of each developed UK nation by population age, gender and social grade (age 18+), and then reweighted by region.



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