

NUALIGHT – Declaration of WEEE Obligations

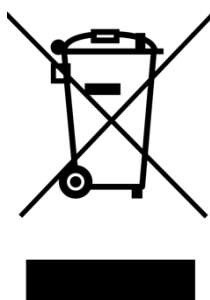
(Written Methodology Statement)

Nov-2023

Waste Electrical and Electronic Equipment recycling (WEEE) is one of the fastest growing waste streams in the developed world. Until recently, a lot of WEEE would have simply been disposed of in landfill. Improved regulation of the collection, recycling and disposal of WEEE has been law at European level (WEEE Directive) and brought into Irish law (WEEE Regulations) since 2005. Irish WEEE Regulation SI 149/2014 were published in March 2014, to implement changes that were introduced in Europe in the second WEEE Directive.

The Environmental directives of the European Community and the UK, are an attempt to reduce pollution and the waste of world resources. Three directives currently regulate the way electrical and electronic goods are designed, manufactured and disposed of at the end of their useful life. These are "Eco-design", "RoHS" and "WEEE". Eco-design deals with the reduction in energy consumption, RoHS deals with the removal of hazardous substances, and WEEE deals with the disposal of waste.

The WEE directive places obligations upon users and producers to handle their electronic and electrical waste more carefully. The legal requirements are very different between B2C (Business to Consumer) and B2B (Business to Business) routes to market. For B2C, businesses are required to join or operate a "take back" scheme. For B2B, businesses can make their own arrangements as appropriate. NUALIGHT only supply B2B. In order to regulate manufacturers and control their methods for compliance with legislation all businesses must have joined a Compliance Scheme by 15th March 2007. NUALIGHT has joined both The Producer Register Ltd (Ireland) and the European Recycling Platform Ltd (UK). As this scheme must be financed, the costs can be re-charged to the customer, as permitted under the law.



All NUALIGHT luminaires carry the Wheelie Bin logo indicating that it should be disposed and recycled in an acceptable manner. NUALIGHT products are long life and highly recyclable. NUALIGHT do not manufacture LAMPS. It should also be noted NUALIGHT product could be re-classified 'out of scope' by our onward B2B customers. In consultation with ORGALIME guidelines, we note our products are typically installed as a component into 'equipment that does not fall within the scope of WEEE' and/or as part of 'outside of scope - fixed Installations' requiring specialist installation and commissioning as defined in the WEE directive. Our products are also specifically designed for Refrigerated Display Lighting applications.

In order to limit the costs and risks which are passed onto our business customers we have decided not to charge a "WEEE Levy" at the time of purchase of the luminaires. To expect our customers to pay at the time the luminaires are purchased perhaps as much as 10-15 years ahead of disposal, in our opinion, is neither fair nor practical. Our method, embraces section 19 of the statute law – the alternative arrangement. It allows two choices for our customers in the future when the luminaires eventually become waste:

1. The customer can choose to appropriately dispose of the waste, via their chosen contractor for example, and may actually recover some cost in later years as commodities become more valuable.
2. The customer can choose to contact NUALIGHT to arrange for unwanted luminaires to be collected. We will then arrange for our "Compliance Scheme Operator" to take back the waste. We do however reserve the right to charge at that time as we did not invoice at the time the luminaires were purchased. It will also be your responsibility to pay for the cost of transportation to the recycler.



We are committed to the environment and we are working hard to make our luminaires last even longer and use even less energy. It is our belief that we are currently market leading in this area. We would like to gather information about the amount of WEEE collected and recycled by our customers. We kindly request that when you dispose of WEEE you fill in a log which will keep some basic information for our records and will also be useful for Government analysis required by the legislation. It is very easy to do and will not take many minutes.

NUALIGHT is not responsible for 'lamps' which are the responsibility of the lamp manufacturer when the lamps become WEEE. Please contact the lamp brand manufacturer at the appropriate time for further information.

NUALIGHT, if acting on instruction from our customer, also reserves the right to charge customers for WEEE waste collection and recycling, where the waste has resulted due to installation or electrical works on behalf of the customer.

This document replaces our previous WEEE declaration, and has immediate effect.

A handwritten signature in black ink, appearing to read 'Andrew Cronin', written over a horizontal line.

Andrew Cronin
CEO