



FM WEEE Compliance Guide

What every Facilities Management team needs to know about WEEE disposal in 2026





FM WEEE Compliance Guide



Time to Read

10 minutes. Everything you need to make a confident, informed decision about your WEEE disposal.

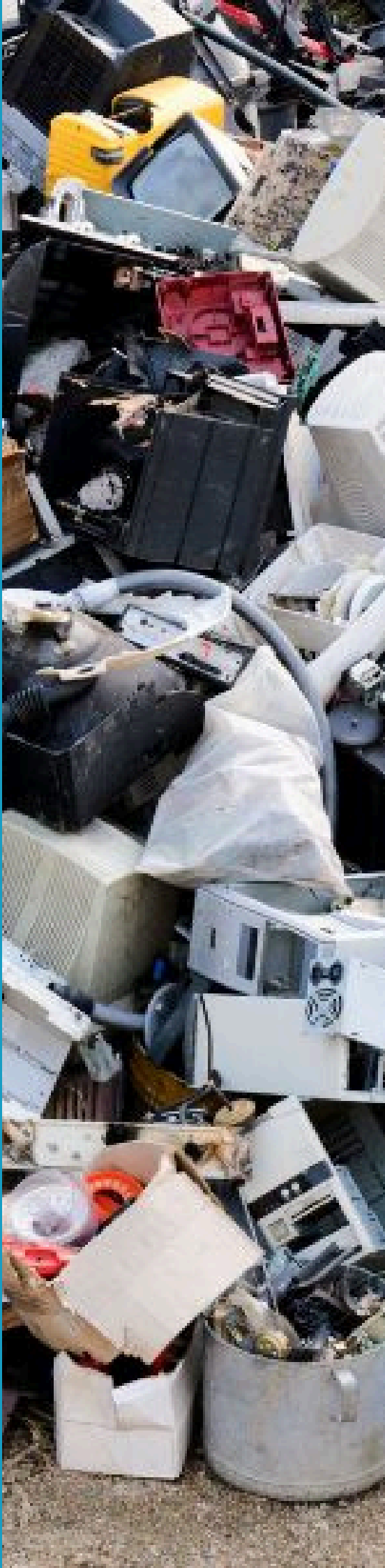
01. WHO THIS IS FOR

FM managers, Sustainability leads, and Operations Directors responsible for waste compliance across multi-site estates.

02. WHAT IT COVERS

Your legal obligations, a compliance checklist, and how to evaluate a recycling partner.





01

What is WEEE?

WEEE stands for Waste Electrical and Electronic Equipment. It covers everything from laptops, monitors, and servers to printers, kitchen appliances, and lighting. For Facilities Management teams, WEEE is one of the most commonly mishandled waste streams - not out of negligence, but because the rules are often misunderstood.

Under the WEEE Regulations 2013 (as amended), any business that produces, handles, or arranges the disposal of electrical waste has legal obligations. As an FM team, you sit at the centre of this: you manage the buildings, coordinate contractors, arrange collections, and are often the named party on waste transfer documentation.

Key Point

Legal responsibility for WEEE doesn't sit with your contractors or your broker. It sits with your organisation. If the chain of custody is broken, your business is exposed - not theirs.

What counts as WEEE?

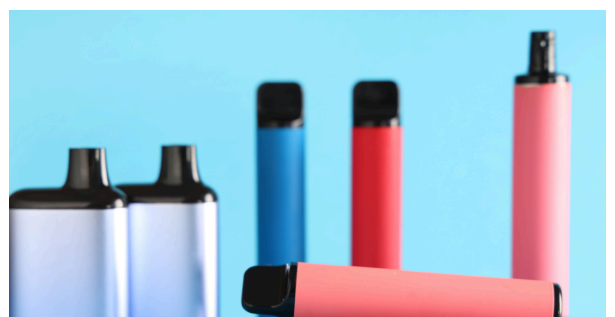
If it has a plug, a battery, or a circuit board, it is almost certainly WEEE. Common items FM teams handle include:

- IT equipment: laptops, desktops, monitors, servers, tablets, keyboards, mice
- Communications: phones, handsets, routers, telecoms equipment
- Lighting: fluorescent tubes, LED panels, emergency lighting units
- Appliances: fridges, microwaves, kettles, air conditioning units
- Office equipment: printers, scanners, projectors, shredders
- Vapes and e-cigarettes: now classified as WEEE - an increasingly significant volume for many sites



DID YOU KNOW?

Vape disposal is one of the fastest-growing WEEE challenges for FM teams. A single vape contains a lithium battery and electronic components - both regulated. Bin disposal is illegal. Many FM teams don't yet have a compliant solution in place.



Your Legal Obligations in 2026

✓ Use an authorised waste carrier

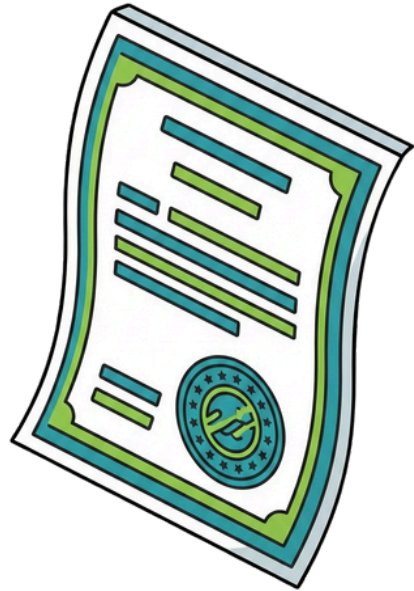
You must only use a registered waste carrier approved by the Environment Agency. Using an unregistered broker or carrier - even unknowingly - is a criminal offence.

✓ Obtain a Waste Transfer Note

Every collection must be accompanied by a signed Waste Transfer Note. You must keep these for a minimum of two years and produce them on request. Note: this applies to non-hazardous waste - see below for hazardous.

✓ Obtain a Hazardous Waste Consignment Note where applicable

Items containing hazardous materials (batteries, CRT screens, fluorescent tubes) require a Hazardous Waste Consignment Note - not a standard WTN. Both you and the carrier must retain copies for a minimum of three years.



Penalty Note

Failure to comply with WEEE regulations can result in unlimited fines, criminal prosecution, and reputational damage. The Environment Agency conducts unannounced audits, and inadequate documentation is the most common compliance failure.

Your Legal Obligations in 2026

✓ **Ensure equipment reaches an authorised treatment facility (AATF)**

Your WEEE must be processed at an Environment Agency-approved facility. You should receive a certificate of destruction or recycling certificate as evidence.

✓ **Data-bearing devices: additional duty of care**

Laptops, phones, and servers containing data must be processed in line with UK GDPR. Proof of data destruction is a legal and regulatory requirement - not optional.

✓ **Keep records for audit**

In the event of an Environment Agency inspection or internal audit, you must be able to demonstrate a clear and unbroken chain of custody for all WEEE removed from your sites.

✓ **Prepare for Digital Waste Tracking (Oct 2026)**

DEFRA is introducing a mandatory digital waste tracking system in October 2026 that will replace paper-based Waste Transfer Notes. Businesses should begin reviewing their documentation processes now to ensure a smooth transition.



Not Sure?

If you have gaps in the list above, a free WEEE audit from GAP Group NE will give you a clear picture of your current position and exactly what needs to change. No cost, no commitment - just a straight answer.

Your WEEE Compliance Checklist

Documentation	✓
We have a current signed contract with a registered waste carrier for WEEE collection	
We obtain and retain a Waste Transfer Note for every WEEE collection	
We obtain Hazardous Waste Consignment Notes for applicable items (batteries, fluorescent tubes, CRTs)	
We have AATF recycling certificates for all WEEE processed in the last 12 months	
All documentation is held centrally and accessible within 24 hours if requested	
Data & IT Equipment	✓
We have a documented process for data-bearing devices before collection	
We receive a certificate of data destruction for every collection of data-bearing equipment	
Our data destruction process is consistent across all sites, not left to individual site managers	
Our data destruction approach meets UK GDPR requirements and can be evidenced	
Multi-Site Consistency	✓
The same approved carrier is used across all sites - not a mix of local contractors	
Site managers know not to dispose of WEEE via general waste or skip hire	
We have a process for ad-hoc collections when volumes spike between scheduled pickups	
Our sustainability or ESG report can accurately reflect WEEE tonnage diverted from landfill	
Vapes & Emerging Items	✓
We have a compliant collection solution in place for vapes and e-cigarettes	
Batteries are collected separately and routed to the correct waste stream	

How to Evaluate a WEEE Partner



Not all WEEE providers are equal. When assessing a recycling partner - whether you are switching from a broker or reviewing an existing arrangement - these are the questions that matter:

Are you an AATF?	They must be an Approved Authorised Treatment Facility registered with the Environment Agency. Ask for their AATF number and verify it at gov.uk .
Do you issue AATF certificates?	Every load processed should result in a certificate you can retain for audit purposes. If they cannot provide these, they are not compliant.
Who actually processes our WEEE?	If the answer is 'our partner' or 'our approved network' without specifics, you are talking to a broker. Push for the name and registration of the actual processing facility.
Can you handle all our sites under one agreement?	A national or regional FM estate needs a partner who can coordinate multi-site collections centrally, not one who handles each site separately.
How do you handle data destruction?	They should have a documented, auditable process for data-bearing devices and issue certificates per collection - not per batch or per quarter.
What reporting do you provide?	You should receive tonnage reports, recycling rate data, and certificate copies in a format that supports your ESG reporting.
What is your response time for ad-hoc collections?	For FM teams managing active sites, you need to know that an unplanned collection can be arranged quickly when needed.

GAP Group NE meets all of the above criteria. We are a licensed AATF processing facility and we are happy to answer any of these questions in detail.



Get a Clear Picture of Your WEEE Compliance

A free WEEE audit from GAP Group NE takes 20 minutes and gives you a complete view of your current compliance position - what's working, what isn't, and what needs to change. No obligation. Just a straight answer.

[Book your free WEEE Audit](#)

About GAP Group



GAP Group is a licensed Approved Authorised Treatment Facility (AATF) providing nationwide WEEE collection, licensed treatment, and complete compliance documentation for FM teams, retailers, and businesses across the UK. We own the entire process - containers supplied, collections managed using our own haulage fleet, treatment carried out at our licensed facilities, and certificates issued for every asset.

Our services cover the full range of FM waste streams: mixed WEEE, IT equipment and data destruction, batteries, lamps and lighting, vapes, white goods, and fridges. We also handle property clearances and site decommissions, and where equipment is still functional our refurbishment division diverts it to reuse before recycling.

We work with FM teams and national retailers managing multi-site estates of all sizes. Every client gets a named account manager, consistent documentation across all sites, and ESG reporting data that supports sustainability reporting.

Contact Us



gapgroupuk.com



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