

EXTENDED PRODUCER RESPONSIBILITY

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About Toxics Link

- Not for profit organisation in India registered in 1998
- Working on issues of waste and chemicals for more than two decades
- Our campaigns hazardous, bio medical, municipal & e- waste management, Lead in paints, Mercury, Chemical in products, EDCs

TL on E-waste

- First to raise the issue in 2003 through its report 'Scrapping the Hi-Tech Myth'
- Sustained campaign over the years
- Research on volumes, environmental concerns, business opportunities, informal sector integration etc.
- Engaging all stakeholders
- Pushed for a separate regulatory framework
- PIL and Rating report to improve compliance
- Active in **suggesting sustainable solutions for E-waste management** in the country.
- Media engagement to create pressure
- Awareness campaigns for general public, especially schools

Waste and EPR



- Increasing waste quantities
- Need for improved waste management and resource efficiency
- Pollution control to sustainability
- Shift from linear to circular, close material loop

Extended Producer Responsibility

A principle for policy making:

- Extending the responsibility of producers over the entire life cycle of the products they manufacture in order to get environmental improvements of the whole life cycle and in particular the end-of-life treatment.(Thomas)

Used for products like EEE, ELV, Packaging, Batteries, Carpet etc

Key Objective

The **one who can change** should be given responsibility = **producers**

- EPR, based on the “polluter pays” principle, entails making manufacturers responsible for the entire lifecycle of the products and packaging they produce.
- Internalize the environmental costs of products into their price.
- Shift the economic burden of managing products that have reached the end of their useful life from local government and taxpayers to product producers and consumers.

Paradigm Shift

- Engage producers
- Use knowledge of producers to develop new systems
- Bring in resources (financial)
- Create incentives to make design changes
- Create opportunities for efficient recycling system

Legal Inclusions

Mandatory, voluntary

EPR-based EU Directives

- ❑ **Implementation of the Directive on Packaging and Packaging Waste (1994 revised in 2004)**
- ❑ **Directive on End-of-life Vehicles (2000)**
- ❑ **Directives on Electrical and Electronic Equipment (WEEE & RoHS) (2003)**
- ❑ **Directive on Batteries and Accumulators (2006)**

India

- ❑ **Battery Management and Handling Rules, 2001**
- ❑ **E-waste Rules, 2011 and 2016**
- ❑ **Some components in Plastic Waste and Solid waste Rules, 2016**
- ❑ **Mercury containing lamps**

Impacts

- Companies like Dell brought in Modularity — The majority of components are easily removable, with standardized parts. This makes it easier to reuse or recycle them. For easy disassembly — reduced the number of screws in products. Minimal glues and adhesives — replaced with snap fits & other more methods that don't hamper recycling.
- Packaging Changes in Germany -Toothpaste tubes are found on store shelves with no cardboard packaging.
- Sharp and Mitsubishi launched the Kansai Recycle Systems facility in Osaka to recycle household appliances.
- Sony recycles its televisions at 15 recycling plants across Japan.

EPR in e-waste in India

- Rules notified in 2011, came into force in 2012
- Under EPR, Producers given responsibility to manage end-of-life arising from their sales
- Set up take back mechanism
- Take financial responsibility
- Ensure safe recycling and disposal
- Phase out hazardous materials under RoHS

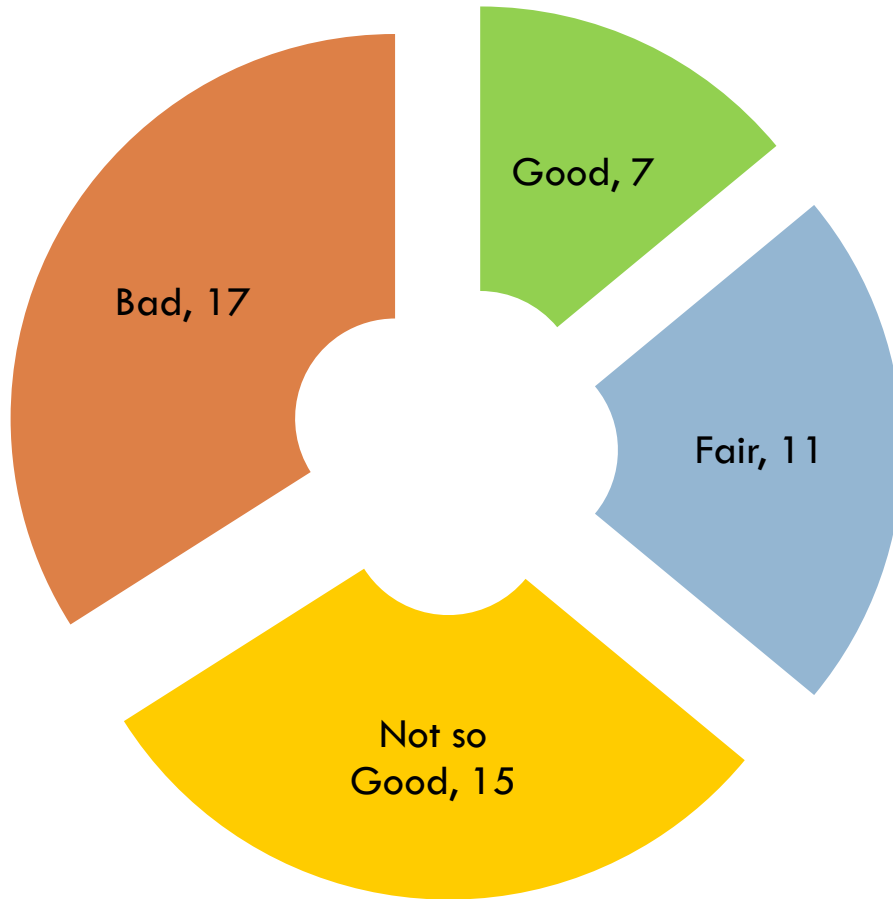
Criteria for EPR rating

- ❑ Sufficiency of information on website/booklets
- ❑ Ease of accessibility to information
- ❑ Take back system
- ❑ Products ROH compliant
- ❑ Collection centers in States/Union Territories
- ❑ Authorization from CPCBs or SPCBs
- ❑ Awareness campaign
- ❑ Annual returns submitted under E-Waste Rules, 2011 for the year 2014-15

Contd...

- Space allocated for E-Waste recycling in product advertisements
- Any other initiative by producers
- Information with customer care or helpline provided
- Take back centre operational
- Authorized recycling units for environmentally sound recycling and disposal of E-Waste

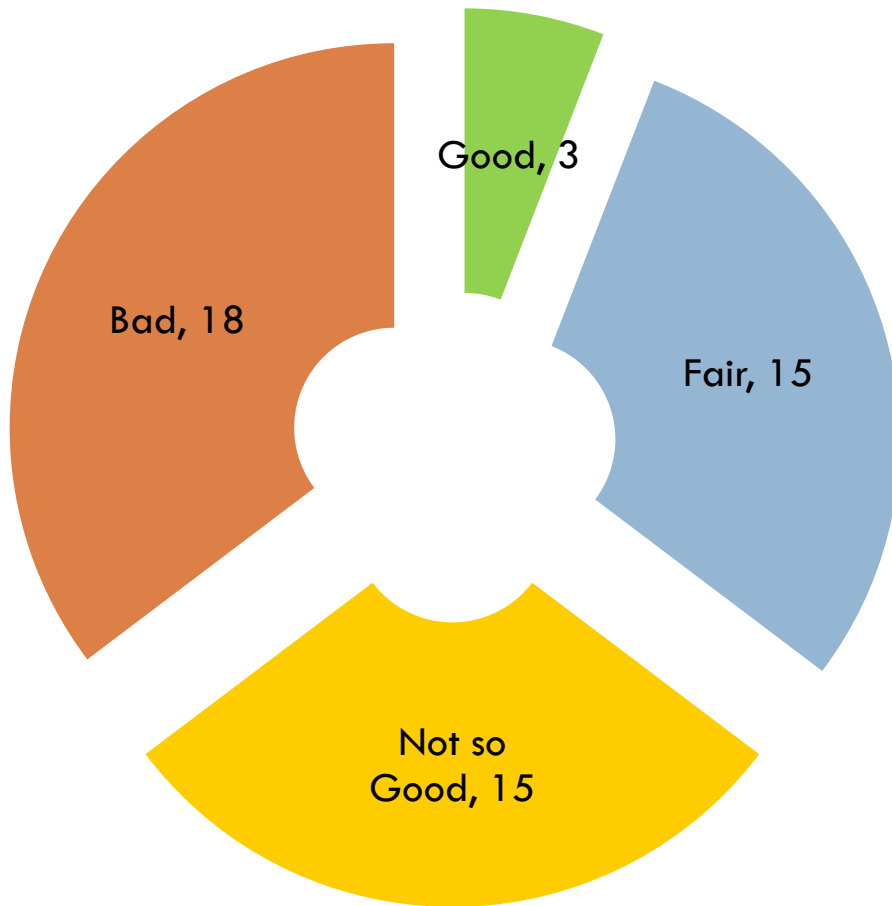
Two years after the rules...2014



- 16 brands with no take back
- 31 with no physical collection points
- No information with helplines of 72% brands

Did it change.....?

How did the Brands fair in 2015



- 15 brands with no take back
- almost 30 with no physical collection points
- No information with helplines of 78% brands
- 17 brands not RoHS compliant

Failure Imminent?

- ❑ Overall integrity of concept not implemented
- ❑ Regulatory framework
- ❑ Accountability for Producers
- ❑ Absence of defined financial mechanism
- ❑ Lack of serious penal clauses
- ❑ No incentives for Compliance
- ❑ Free riders
- ❑ Informal sector

Possible Drivers



- Measuring EPR- Separate team for monitoring
- Level playing field
- Incentives for takeback and green design
- Financial Instruments