Indo-German Environment Partnership

Gaps in Implementation of the Rules

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Underlining Objectives of the Rules

- Reduce unauthorized and illegal disposal of WEEE
- Provide consumers with a producer take-back scheme for end-of-life products
- Establish collection facilities and collection systems of WEEE
- Improve product design and reduce hazardous substances
- Provide mechanism for the establishment and financing of systems for WEEE management
E-waste Management and Handling Rules- Major Stakeholders

- Regulators: Developing regulations, standards, monitoring, consent and authorization, inspection, compliance assurance, self regulation and penal provisions;

- Producers: Set up Take back mechanism (individual or combined), awareness, financial and physical responsibility for channelization of waste

- Consumers- Bulk and Individual: Channelization, maintain record

- Recyclers (Formal and Informal): compliance under the E-waste Rules, Collection, segregation, dismantling and treatment, residue disposal
Regulators – State and Central level

Capacities gaps on implementation

- Implementation
  - Inventory – National, State level; Protocol/ Guidance
  - National registry of producers
  - Registration of producers - State vs. City vs. Port of Entry
  - Awareness generation – stakeholder analysis
  - Market based instruments
  - Amendments to curb non-compliance
  - Linkages with ULBs for orphan products
  - 3Rs
Regulators – State and Central level

Capacities gaps on compliance and monitoring

- **Compliance**
  - Take Back Mechanism of producers
  - RoHS – Roadmap?
  - Awareness generation
  - Free Riders?
  - Informal – Formal

- **Monitoring**
  - Building evidences for non-compliance
  - Annual reports of recyclers, bulk consumers and producers
  - Penal provisions for violations – Section 15, EP Act
  - Quality assurance of data processing, analysis and publishing information
Producers

- Willingness and Ownership towards Responsibility:
  - Achieve certain targets through Self regulation/ voluntary
  - Commitments for Pan India Take Back
  - Reverse logistics for Individual and Bulk Consumers?
  - 3Rs
- EPR: financial and physical responsibility and commitments
  - Market based instruments – ARF, DRS etc.
  - Buy back mechanisms with dealers, suppliers etc.
  - Collection points/ centres
  - Interim Audits of the tie-ups with recyclers & downstream vendors
- Transport and logistics
- Products with negative salvage value
Producers

- Awareness
  - Publish information
  - Advertisements?
- Ecological standards
  - EPR as an enabler towards resource recovery
- Monitor, Inform and report
  - Information disclosure on collection centres?
  - Monitoring and reporting
  - Downstream vendors of recyclers
Consumers- Individual Consumers

- Most crucial actor
- Consumers especially youth are aware that e-waste disposal require special care as it is hazardous to environment and health
- Have to collect and deposit e-waste separately
- Only price, brand name, specifications and quality as parameters towards purchase
- Revive traditional take back system with responsible behavior
Consumers- Bulk Consumers

Awareness

- Roles and responsibilities to be clarified
- Buy back policies
- Auction procedure
- Inventory of products – life, quality, maintenance etc.

Operational Issues

- E-waste management policy is absent in many public/ private organizations
- Information reporting
- Voluntary initiatives
- Understanding of the designated staff
- Technical evaluation of recyclers
Recyclers- Formal and Informal

- Integration of the informal sector in the formal collection channels - "formalization"
- Collection centres – linkage to dismantlers and recyclers
- Dismantlers – audits of downstream vendors
- Recyclers - resource recovery potential
- Book keeping, monitoring and reporting
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