Extended Producer Responsibility

A hope for the mounting Electronic waste

Kopal Dixit
Introduction

• According to Global E-waste monitor report: 44.7 mt of E-waste was generated in 2016, globally.

• India contributed around 2 mt of E-waste in 2016, only second highest after China in Asia and 5th highest globally.

• Separate Rules for E-waste recycling/reprocessing called *E-waste (Management and Handling) Rules, 2011*. Extended Producer Responsibility was introduced as a key principle in handling E-waste.
Time to Reboot (2014)

- The performances of 50 top electrical and electronic brands were tested against various criteria.
- The study clearly indicated that EPR was still primarily on paper and was not put in action.

Time to Reboot II (2015)

- It based on re-evaluation of the efforts of producers on issues related to E-waste.
- Though improved efforts were noticed many gaps were identified in the implementation.

Rating (2014)

<table>
<thead>
<tr>
<th>Rating</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Poor</td>
<td>17</td>
</tr>
<tr>
<td>Below Average</td>
<td>15</td>
</tr>
<tr>
<td>Average</td>
<td>11</td>
</tr>
<tr>
<td>Good</td>
<td>7</td>
</tr>
</tbody>
</table>

Rating (2015)

<table>
<thead>
<tr>
<th>Rating</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Poor</td>
<td>18</td>
</tr>
<tr>
<td>Below Average</td>
<td>15</td>
</tr>
<tr>
<td>Average</td>
<td>15</td>
</tr>
<tr>
<td>Good</td>
<td>3</td>
</tr>
</tbody>
</table>
EPR in E-waste Rules, 2016

- Online Sellers
- CFL Bulbs manufacturers

- Take Back Policy
- RoHS Compliance
- Collection Targets
- Authorized Recycler
- Authorization
- Information in Product Booklet
- Awareness

EPR
Time To Reboot - III

Idea
Objectives

• To evaluate the performance of Producers with respect to the implementation of E-waste (Management) rules, 2016, especially Extended Producer Responsibility (EPR).

• To assess the accessibility of information/ services for a consumer with regards to the take back system.
Methodology

• The criterion for Time to Reboot III was revised according to 2016 rules and amendment, 2018.

• This evaluation includes lighting companies (CFL Bulbs) as they have been counted in as stakeholders.

• After collecting information comprehensively from various sources, the companies were given a score, according to each criterion which were then tabulated.
The companies were then divided into 4 categories:

- Companies with score between 0 – 49 – Poor Rating
- Companies with score between 50 – 99 – Below Average Rating
- Companies with score between 100 – 149 – Average Rating
- Companies with score between 150 – 200 – Good Rating

Further analysis was done according to these score and rating.*

*The new rating has been devised by Toxics Link and is based on their understanding of the current requirements of E-waste (management) Rules, 2016 and E-Waste (Management) Amendment Rules, 2018.
## Brands Included

54 Brands have been included in Time to Reboot III

<table>
<thead>
<tr>
<th>Acer</th>
<th>Apple</th>
<th>Asus</th>
<th>Bajaj Electricals</th>
<th>Beetel</th>
<th>Binatone</th>
<th>Blue Star</th>
<th>Bosch</th>
<th>Canon</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carrier</td>
<td>Daikin</td>
<td>Dell</td>
<td>Epson</td>
<td>Eveready</td>
<td>Godrej</td>
<td>Haier</td>
<td>Havells</td>
<td>Hitachi</td>
</tr>
<tr>
<td>HP</td>
<td>HP India</td>
<td>HTC</td>
<td>Huawei</td>
<td>iBall</td>
<td>IFB</td>
<td>Intex</td>
<td>Karbonn</td>
<td>Kyocera</td>
</tr>
<tr>
<td>Enterprise</td>
<td>Lenovo</td>
<td>LG</td>
<td>Micromax</td>
<td>Mitsubishi Electric</td>
<td>Motorola</td>
<td>O General</td>
<td>One plus</td>
<td>Onida</td>
</tr>
<tr>
<td>Oppo</td>
<td>Oreva</td>
<td>Osram (LED-VANCE)</td>
<td>Panasonic</td>
<td>Philips Lighting (Signify)</td>
<td>Ricoh</td>
<td>Samsung</td>
<td>Sony</td>
<td>Surya</td>
</tr>
<tr>
<td>Toshiba</td>
<td>Videocon</td>
<td>Vivo</td>
<td>Voltas</td>
<td>Vu</td>
<td>Whirlpool</td>
<td>Wipro</td>
<td>Xerox</td>
<td>Xiaomi</td>
</tr>
</tbody>
</table>
## Criterion

<table>
<thead>
<tr>
<th>Authorization from CPCB</th>
<th>Take back policy</th>
<th>RoHS compliance of the product</th>
<th>Submitted annual returns</th>
</tr>
</thead>
<tbody>
<tr>
<td>E-waste collection target achieved</td>
<td>Information with customer care</td>
<td>Take back center operational</td>
<td>Tie up with authorized recycler</td>
</tr>
<tr>
<td>Sufficient information on the brand’s website</td>
<td>Information provided on the product booklet</td>
<td>Collection centers/pick up in states/UTs</td>
<td>Ease of Access to information on Public Domain</td>
</tr>
<tr>
<td>Awareness Campaigns conducted</td>
<td>Any other initiative taken</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Criterion where companies were marked only according to consumer perspective*
Source of Information

• Producer’s website

• Collection Centers

• Helpline Number

• Producer Questionnaire

• Pollution Control Websites
Response from Producers

Number of companies that responded to our questionnaire

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>46</td>
</tr>
</tbody>
</table>

Source: [www.greenhumour.com](http://www.greenhumour.com)
Time to Reboot III – Reality
New Rules, but old practices?

Rating (2014)

- Poor: 17
- Below Average: 15
- Average: 11
- Good: 7

Rating (2015)

- Poor: 18
- Below Average: 15
- Average: 15
- Good: 3

Rating (2018)

- Poor: 5
- Below Average: 29
- Average: 13
- Good: 7
Backbone of E-waste management - Takeback

Take back system

5 No
49 Yes
Ground Reality of Takeback

Collection Centre Operational

- 18 No
- 8 Yes

Collection Centres in States

- None: 18
- More than 10 states: 9
- More than 20 states: 9
- All: 18
Reaching out to Consumers

Information Sufficiency

- 31 Brands with Information on Take Back and Collection Centre
- 15 Brands with Information on Take Back
- 8 Brands with No Information

Ease of Access to Information

- 31 Brands with Easily Accessible Information
- 15 Brands with Accessible but with difficulty
- 8 Brands with Information Unavailable

Information Available with Helpline

- 32 Brands with Full Information
- 21 Brands with Partial Information
- 1 Brand with No Information

Number of Brands
Producers- Creating Ecosystem?
Lighting companies need to show some spark!

<table>
<thead>
<tr>
<th>Lighting companies*</th>
<th>Total Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eveready</td>
<td>0</td>
</tr>
<tr>
<td>Havells</td>
<td>0</td>
</tr>
<tr>
<td>Oreva</td>
<td>0</td>
</tr>
<tr>
<td>Osram (LEDVANCE)</td>
<td>25</td>
</tr>
<tr>
<td>Bajaj Electricals LtD</td>
<td>50</td>
</tr>
<tr>
<td>Wipro</td>
<td>60</td>
</tr>
<tr>
<td>Philips Lighting (Signify)</td>
<td>65</td>
</tr>
<tr>
<td>Surya</td>
<td>85</td>
</tr>
</tbody>
</table>

*None of these companies responded to our questionnaire*
Concerns

• Seven years since the 2011 Rules- unfortunately we are discussing whether the Producers have a take back system.

• How are producers with no take back system still selling goods?

• Free Riders

• Producers submitting plans on paper- but not being translated on ground

• Weak regulatory compliance and lack of enforcement

• Orphan Products
Recommendations

• Better enforcement of Rules and additional powers to the regulatory bodies

• Third party audits or compliance checks

• Action against non-compliant Producers

• Carrot and stick policy

• Educating and Enabling Producers

• Negative value of E-waste