E-waste Framework

Missing the pieces?
Why the search?

- Hardly any change on the ground
- Most Producers still not complying with EPR
- Hordes of licenses issued to Recyclers
- Material still flowing to unorganised sector
- Illegal recycling continues unabashed!
- Most consumers still unaware of this tech monster called ‘e-waste’
Missing the point?

- Who is allowed to sell in the country? Everybody?? Then why EPR?

- Who is suppose to collect the waste? Producer/ Collector/Dismantler/ Recycler? Too many players?

- Who is to monitor? Nobody? Then why the Rules?

- Penalty
  Is it scary enough?
Application and Definition

- MSME left out. Should they be (Producers/Recyclers)?

- Producers- Does it cover everyone...online seller

- Recycling/reprocessing/Refurbishment- not defined
Extending or Limiting - EPR?

- Does not mention any mean to identify the producers who are selling in India
- Setting up collection centres - Does not specify how many, where?
- Take back systems - What does that mean?
- Talks about Financing – but does not clarify
- Information to consumers - too broad
- Which is concerned SPCB?
Collection and Processing

- Multiple collectors - where is EPR then?
- What specifications - can anybody apply?
- No area jurisdiction defined
- No defined mechanism to spot leakages
Dismantling and Recycling

- No specifications in the Rules/ Guidelines- SPCBs have no guidance on who to give or who to refuse

- No specifications to check downstream flow of waste

- Are BFR plastic/CRT glass to be treated in specific manner- not mentioned

- Can they refurbish and resell?
RoHS - the waiting game

- No guidelines even after May 2014 – the time when it was supposed to come into action
- Rules do not mention who will be checking RoHS compliance
- Exemptions - not in line with the Rules
- Does not mention Customs as a stakeholder who will be responsible
Missing Pieces?

Standards

Accountability

Awareness

Monitoring

Transparency