



TIME TO REBOOT II



Toxics Link
for a toxics-free world

About Toxics Link:

Toxics Link emerged from a need to establish a mechanism for disseminating credible information about toxics in India, and for raising the level of the debate on these issues. The goal was to develop an information exchange and support organisation that would use research and advocacy in strengthening campaigns against toxics pollution, help push industries towards cleaner production and link groups working on toxics and waste issues.

Toxics Link has unique experience in the areas of hazardous, medical and municipal wastes, as well as in specific issues such as the international waste trade and the emerging issues of pesticides and POP's. It has implemented various best practices models based on pilot projects in some of these areas. It is responding to demands upon it to share the experiences of these projects, upscale some of them and to apply past experience to larger and more significant campaigns.



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ACKNOWLEDGEMENTS

Time to Reboot was released last year and received good response from all around. Officers from Regulatory Agencies, Industry, Civil society organisations and experts welcomed the idea, prompting us to plan the next edition. Feedback, both positive and negative, also helped us in redefining the criteria and we would like to take this opportunity to thank all of them.

We would like to thank Mr. Ravi Agarwal, Director, Toxics Link for his continued guidance and encouragement. We would like to thank Mr. Satish Sinha, Associate Director, Toxics Link who guided us through the entire research process and helped us in shaping the report. Our special thanks to Vinod Babu, CPCB, who shared his input on our revised criteria.

Our sincere thanks are also to all team members of Toxics Link for their valuable inputs and suggestions.

FOREWORD

Environmental governance in India has been a matter of concern and public debate; many attribute this to weak regulatory structures and the health of institutions responsible for implementation and compliance. While serious attempts are being made to create progressive rules, the efficacies of these have not been very encouraging, owing mainly to weak governance. The ensuing result is all round deterioration in environmental standards. Though it is imperative to improve the governance, it is also critical for independent organizations and agencies to come forward and contribute towards improving environmental compliance.

The e-waste Rules were notified in 2011, incorporating two key elements of EPR and ROHS, with an intent to address the environment and human health concerns arising due to improper e-waste handling practices. The Rule, which came into effect from 2012, places relatively greater responsibility on the producers, ushering in new paradigm and thereby bringing in newer challenges in implementation and compliance.

'Time to Reboot II', as the title suggests, is in continuation to our first report last year which rated the top Producers of EEE in the country on their performance on EPR, and is a sustained effort towards improving compliance to the Rules. The findings of this report indicate that the Producers are still shying away from their responsibility and there is a need to address many gaps and improve overall compliance. The report is quite well timed as the findings can be a good input into the "Swachh Bharat" campaign on waste management launched by Government of India.

We hope that this effort of Toxics Link will be able to push the Producers and contribute towards improving environmental governance.

Satish Sinha

Associate Director

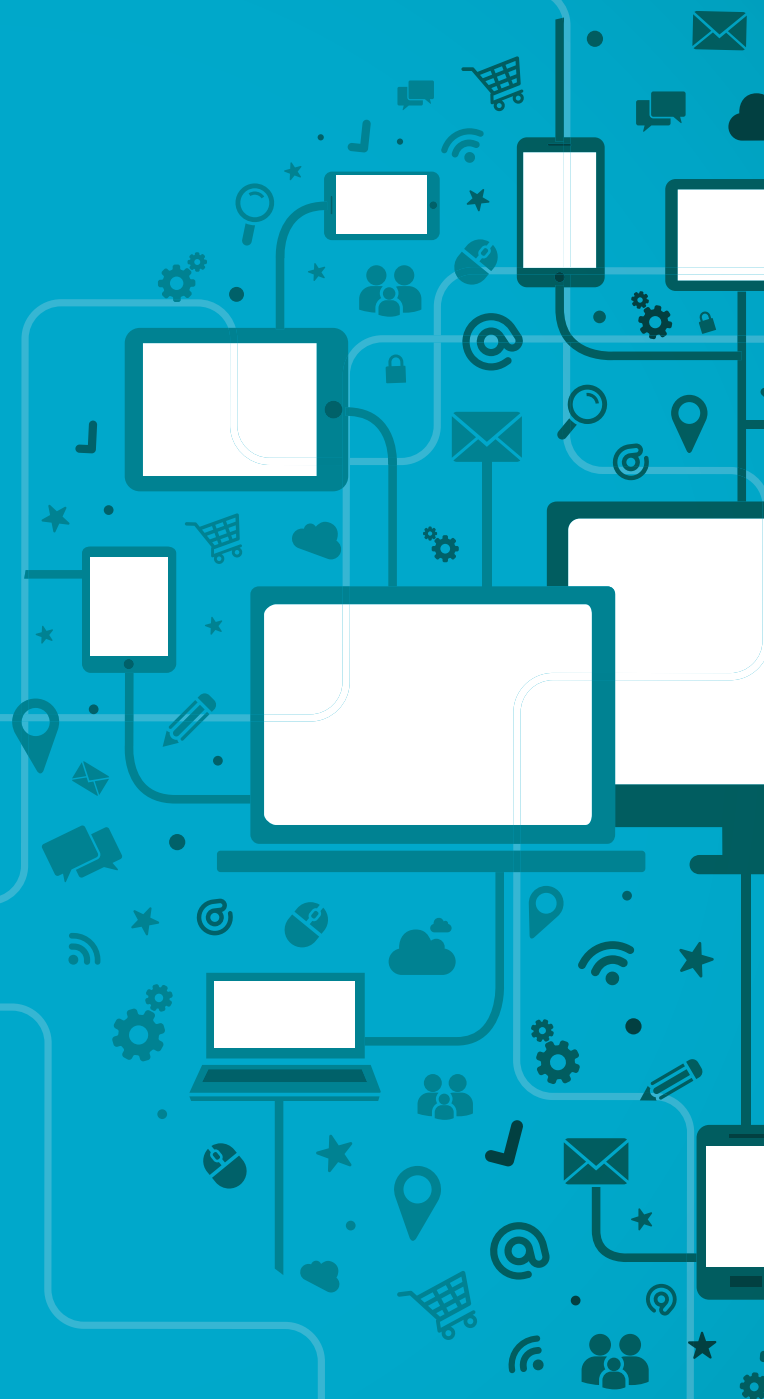
Toxics Link

BACKGROUND

Electronic waste (e-waste) is one of the fastest growing waste streams worldwide with over 50 million tons produced annually. It is a complex waste stream as it contains both scarce and valuable components and materials worth recovering, and toxic components and materials that pose a danger to environment and public health. E-waste therefore needs to be recycled in an environmentally sound manner that maximizes material recovery and minimizes environmental damage and health risks.



INDIA
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E-WASTE
ANNUALLY



However in India, the fifth biggest producer of e-waste in the world with close to 1.7 million tons of e-waste generated annually, a large percentage of e-waste is recycled in the informal sector without any control measures in place. This not only results in loss of valuable resources but also raises environmental and health concerns. To mitigate the risk and reduce environmental pollution, the E-waste (Management and Handling) Rules were notified in 2011 by the Ministry of Environment and Forests, & CC Government of India. These rules came into effect from May 2012 and put the main responsibility for ensuring environmentally sound management of e-waste on producers or the Brands¹ which place these electronic goods in the market. Extended Producers Responsibility, which has been the corner stone of E-waste regulation across the globe, was the key tenet here as well.

‘TIME TO REBOOT’, THE STUDY RELEASED LAST YEAR LOOKED AT THE PERFORMANCES OF 50 TOP ELECTRICAL AND ELECTRONIC BRANDS OR PRODUCERS... WITH 17 OUT OF THE 50 BRANDS COMPLETELY VIOLATING THE E-WASTE RULES AND ANOTHER 15 BRANDS TAKING VERY LITTLE ACTION

Two years after the Rules being in force, in June 2014, Toxics Link sensed that the Rules were not being implemented properly and decided to assess the effectiveness of these Rules. ‘Time to Reboot’, the study released last year looked at the performances of 50 top electrical and electronic brands or Producers (defined in the Rules) and also at the measures taken by SPCBs to ensure that the Rules were being followed. The findings were disheartening, with 17 out of the 50 brands completely violating the E-waste Rules and another 15 brands taking very little action. Only 7 Producers/Brands had put in place good systems to fulfill their responsibility, with another 11 brands taking fair measures. The Pollution Control Boards, that are the implementing authorities, fared even worse, with most PCBs having failed to initiate any steps on this.

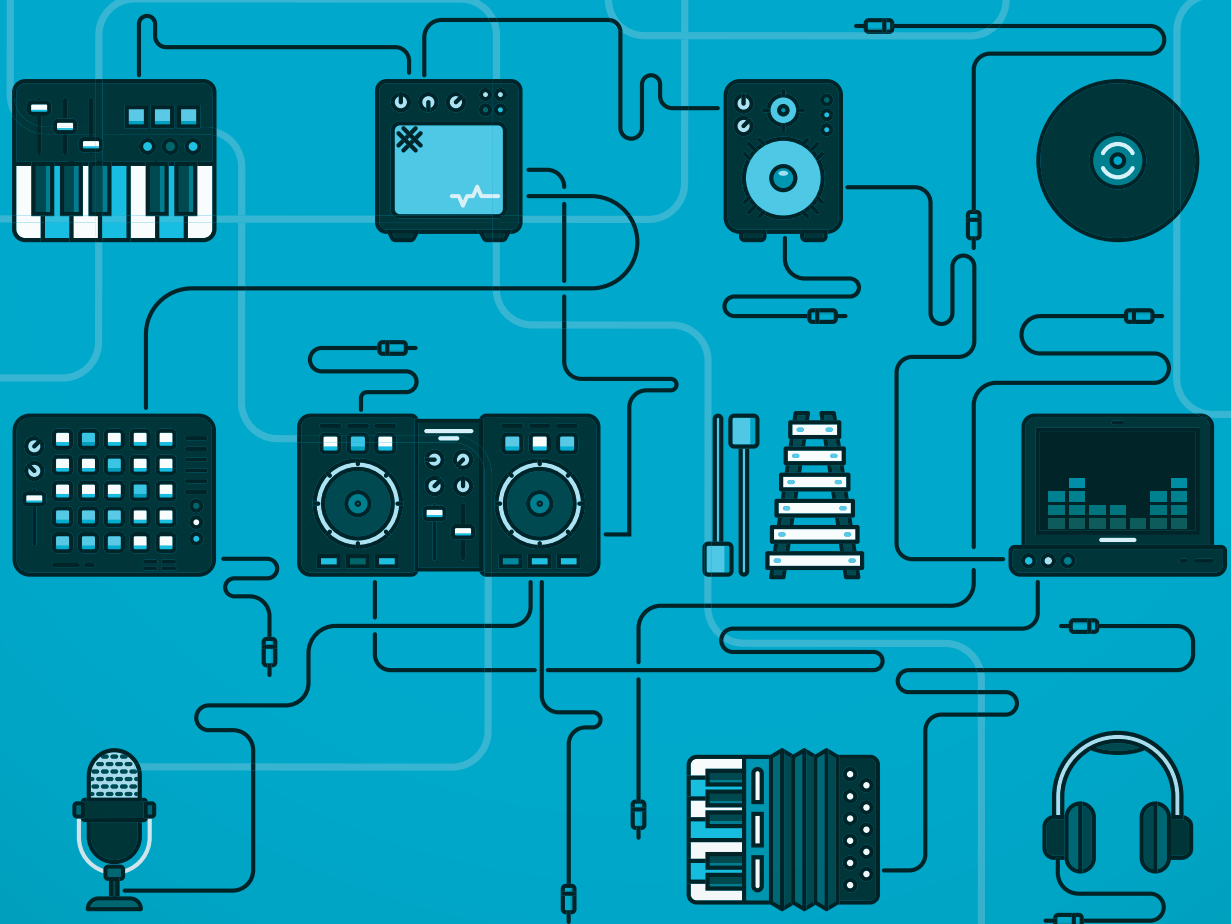
The report and the rating system was very well received and not only generated a lot of discussion on the effectiveness of the Rules, but triggered some changes on the ground. Post the release of report, probably prompted by it, many Producers put in place takeback systems in the country and some SPCBs took measures for implementation and monitoring.

Though the gaps might have narrowed in the last one year, we can still see that the Producers not fulfilling their roles on e-waste management, with many shying away from even setting up takeback or collection mechanism. Though the Producers, under the E-waste Rules, 2011 have been mandated for ‘creating awareness through publications, advertisements, posters or by any other means of communication and information booklets accompanying the equipment’, there has been little effort to do so. Hence, we felt that there is a need to assess the efforts of the producers and also appreciate some of the good work being done by them. Time to Reboot II looks at the performance of the Producers on issues related to E-waste, also brings to fore some of the ongoing gaps in implementation.

Since the Rules are under revision, the State Pollution Control Boards have been left out of this year’s report.

¹ Producers and Brands terms have been used in the report interchangeably. They indicate the Producers defined under the E-waste Rules, 2011.

RATING THE BRANDS






The last year rating system on the Brands was primarily designed to check the E-waste take back consumer friendliness². It was mainly based on Company Policy on E-waste in India (based on website information) and the response (based on interaction with helplines and customer care). This year the rating system has been enhanced³ and also includes other criteria like compliance on Reduction in the use of hazardous Substances (RoHS), functionality of the collection points, awareness initiatives etc. The requisite information was sourced from-




- Producers Website
- Direct information from Brands
- Call to customer care
- Visit-collection centre

Criteria – Total of 200 points





1. Sufficiency of information on Website (A maximum of 10 points) (based on website)

- | | | |
|----|---|--|
| 0 |  | No information |
| 5 |  | Information on Takeback/call centre number |
| 10 |  | Information on Takeback and Collection centers |





2. Ease of accessibility to information (A maximum of 10 points) (based on website)

- | | | |
|----|---|-------------------|
| 0 |  | More than 3 links |
| 5 |  | 1 to 3 links |
| 10 |  | Homepage |

3. Information provided in the booklet (A maximum of 20 points)

- | | | |
|---|---|----------------------------------|
| 5 |  | Information on RoHS |
| 5 |  | Information on E-waste |
| 5 |  | Information on collection system |
| 5 |  | Symbol |

**UNDER THE
E-WASTE
RULES, 2011**
PRODUCERS HAVE
BEEN MANDATED
FOR 'CREATING
AWARENESS
THROUGH
PUBLICATIONS,
ADVERTISEMENTS,
POSTERS OR BY
ANY OTHER MEANS
OF COMMUNICATION



	Companies with points between 150 and 200: Green (Good Performance)
	Companies with points between 100 and 149: Blue (Fair Performance)
	Companies with points between 50 and 99: Yellow (Not so good Performance)
	Companies with points between 0 and 49: Red (Bad Performance)



² The rating was evolved by Toxics Link and was based on their perception of consumer needs and understanding.

³ The new rating system has been devised by Toxics Link and is based on their understanding of the current requirements on E-waste management.






4. Takeback system (A maximum of 15 points)

0  No takeback
15  Take back system in place

5. Products RoHS Compliant (A maximum of 15 points)

0  No
15  Yes

6. Collection centres in all states/UTs (A maximum of 20 points)

0  No
5  More than 10 states
10  More than 15 states
15  More than 20 states
20  All states




7. Authorization from CPCB or SPCBs (A maximum of 5 points)

0  No
5  Yes




8. Submitted Annual returns under E-waste Rules, 2011 for the year 2014-15 (A maximum of 5 points)

0  No
5  Yes




9. Number of collection Points (A maximum of 15 points)

5  1-49 points
10  50-100 points
15  >100 points



10. Awareness campaigns conducted (A maximum of 15 points)

5  In Print Media
5  In Television or video ads
5  Through social media



11. Amount of space allocated for e-waste recycling in Product Advertisements (A maximum of 15 points)

5  5%
10  10%
15  More than 15%

12. Any other initiative taken (A maximum of 10 points)

- 5  Direct engagement with consumers
- 5  Engagement with informal sector

13. Information with Customer Care or the helpline provided (A maximum of 10 points)

- 0  No Information
- 10  Information provided

14. Take back centre operational (A maximum of 20 points)

- 0  No
- 20  Yes

15. Tied up with an authorised recycler for environmentally sound recycling and disposal of e-waste collected through Take back programme (A maximum of 15 points)

- 0  No
- 15  Yes

1. SUFFICIENCY OF INFORMATION ON WEBSITE

Websites of all the Producers/ Brands included in the study were accessed in a particular time period for information related to E-waste, Rules, takeback system, help lines and collection center details. This was primarily to understand if there was sufficient information for consumers to understand about E-waste and to return their end of life products.

2. EASE OF ACCESSIBILITY TO INFORMATION

Along with adequacy, it is important where this information is placed in the websites. In many instances, the information is so buried inside the website that consumers find it extremely difficult to access it unless she/he is looking for this particular information. With little awareness on e-waste, it seems unlikely that consumers would be seeking this specific information on the website. Hence, placing the information in an often visited or visible space is important.

3. INFORMATION PROVIDED IN THE BOOKLET

Most EEE when they are sold come with information booklets. E-waste Rules, 2011 also mentions that Producers may use this to create awareness among consumers. We asked the Producers as well as looked at their online booklets for whether they had included information related to E-waste in these booklets given to consumers.

4. TAKEBACK SYSTEM

Setting of takeback systems is one of the key responsibilities entrusted to Producers under the Rules. Producers can do this individually or collectively. It remains as one of the basic criteria under EPR. Websites of the brands were primary source for this information.

5. PRODUCTS ROHS COMPLIANT

Phasing out of toxic material is key to ensuring that e-waste manufactured and sold is less hazardous and is mandated under the Rules. This criterion has been added in this year's rating system as Reduction in the use of Hazardous Substances in the manufacture of EEE came into effect from May 2014, two years from the Rules coming into force. Websites, information booklets and direct responses from brands were source for this.

6. COLLECTION CENTRES IN ALL STATES/UTS

EEEs are sold across India and have penetrated every state in the country. The widespread usage would also mean scattered e-waste generation. It has been observed that in India the e-waste collection infrastructure is concentrated around the larger cities. Also, though some states, which have high e-waste generation, have multiple collection points, in other states the consumers have no way to discard their end of life equipments. This criterion looked at whether the Producers had set up infrastructure for consumers across India, covering all states. Information was gathered through direct responses as well as the websites.

7. AUTHORIZATION FROM CPCB OR SPCBS

It is mandatory for Producers to seek authorization from the concerned State Pollution Control Board or Pollution Control Committee. Many have also sought it from Central Pollution Control Board because of their Pan India presence and operations. The Producers were asked for this information and were awarded points for being granted authorization, also in case they had applied for authorization but had not received it as yet.

8. SUBMITTED ANNUAL RETURNS UNDER E-WASTE RULES, 2011 FOR THE YEAR 2014-15

This is mandated under the Rules. Since many Producers had not filed return for this particular financial year till the date of response, their earlier returns were taken into account. The Producers were directly contacted for this information.

9. NUMBER OF COLLECTION POINTS

Even in European countries where e-waste awareness is quite high among consumers, convenience of collection or drop off points has remained a big challenge. In a large country like India, where millions of consumers are spread across the country, it is important to have adequate collection infrastructure to facilitate returns. Hence, number of such points where e-waste is collected by Producers or their representatives becomes crucial. The website was the primary source of information for this.

10. AWARENESS CAMPAIGNS CONDUCTED

Producers of EEE have been assigned the responsibility of creating awareness through different means. This criterion looked at whether they had made any efforts towards that. Since it was difficult to get this information from websites, the brands were contacted directly for this information and included use of social media, print, visual mediums etc.

11. AMOUNT OF SPACE ALLOCATED FOR E-WASTE RECYCLING IN PRODUCT ADVERTISEMENTS

Most EEE Producers spend millions on advertising their products. But unfortunately E-waste finds little space in that. Since ads are direct and effective mediums to reach out to consumers, this could probably be an effective way of educating the consumers on e-waste. This criterion was based on this and the producers were contacted directly for this criterion.

12. ANY OTHER INITIATIVE TAKEN

Apart from awareness through various mediums, it was important to understand if the Producers were taking any initiative to improve the eco system. Their direct engagement with consumers or with informal sector was rewarded through points in this criterion. Again, Producers were asked to share the details with us.

13. INFORMATION WITH CUSTOMER CARE OR THE HELPLINE PROVIDED

Most Producers have provided helpline numbers for e-waste on their websites. The numbers were contacted as consumers to understand the clarity and depth of information available with the executives.

14. TAKE BACK CENTRE OPERATIONAL

In our last year's rating survey, it was discovered that though many Producers had mentioned about their collection infrastructure, on ground these were non-existent. In a large number of cases these collection points were not accepting e-waste, nor had – any information related to it. This year, collection points (operated by Producers or third party) of all brands (those who had listed their collection points either on their website or through response to our questionnaire) were visited to understand if these points were operational.

15. TIED UP WITH AN AUTHORISED RECYCLER FOR ENVIRONMENTALLY SOUND RECYCLING AND DISPOSAL OF E-WASTE COLLECTED THROUGH TAKE BACK PROGRAMME

Producers have to ensure that e-waste collected by them is channelized to authorized e-waste recyclers. The websites of the brands were accessed to see whether this was in place.

BRANDS INCLUDED

Last year 50 Brands/Producers were included. Though most of these companies still remain the top sellers of the Electronics products defined under the E-waste Rules, there have been few changes. This year 51 brands were evaluated on the basis of the decided criteria. A mix of Indian and multinational Brands selling Electrical and Electronic Equipments (covered under Schedule 1 of E-waste Rules, 2011) were covered in this study. Due to certain limitations, local brands (regional or city) could not be included in the study.

The information was collected through various means. The Brand websites were accessed, the help lines or customer care numbers provided by the companies on their website were contacted and the collection centres were visited. In addition to these, the Brands/Producers were contacted through email and letters with a questionnaire. The associations of Information Technology equipments, consumer electronics and telecom equipments were also contacted. Answers of the Brands which responded to our questionnaire were included. The brands which did respond scored zero on the particular criteria which were based on their inputs.

LIST OF COMPANIES INCLUDED IN THE STUDY (IN ALPHABETIC ORDER):

Acer	Daikin	Huawei India	Micromax India	Sony India
Apple (India)	Dell	iBall	Microsoft India	Spice
Asus	Electrolux	IBM India	Motorola	Toshiba
Ben Q India	Epson India	Intex Technologies	Olive	Videocon
Blackberry	Godrej	Karbonn	Onida	Voltas
Bluestar	Haier	Lava	Panasonic India	Whirlpool India
BPL Group	HCL	Lemon	Philips	Xerox India
Canon India	Hitachi	Lenovo	Samsung	Xiaomi
Carrier	Hewlet Packard India	LG	Sansui India	Xolo
Celkon	HTC	Maxx	Sharp India	Zen

PRODUCERS-RESPONSIBILITY EXTENDED?

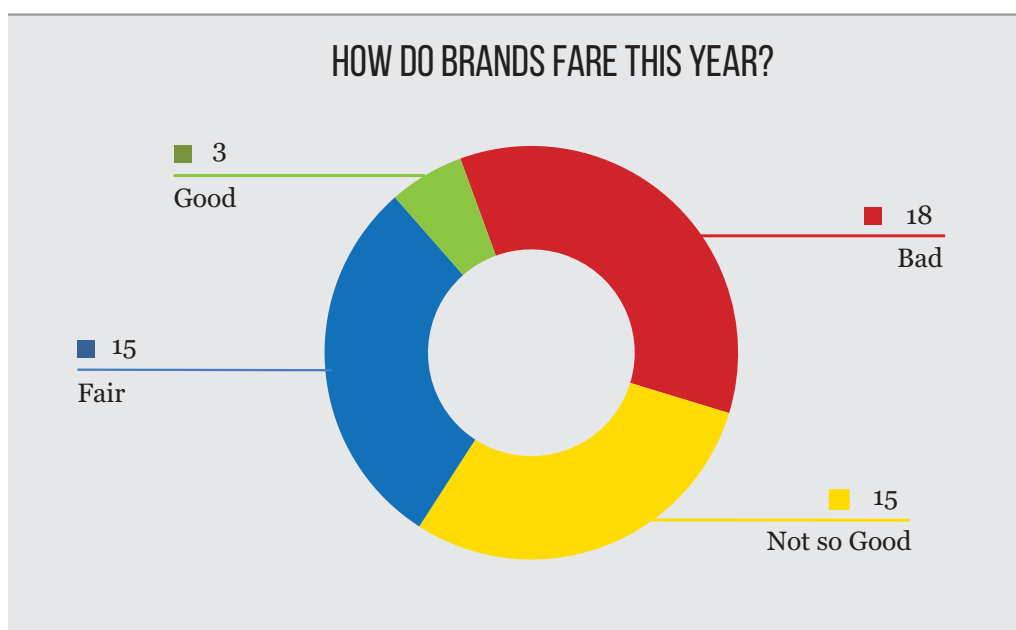
Extended producer's responsibility (EPR) is main feature of the E-waste (Management and Handling) Rules, 2011, wherein the producer of electrical and electronic equipment has been given the responsibility of managing such equipment after its 'end of life', thus the producer is responsible for their products once the consumer discards them. Under this EPR, producer is also entrusted with the responsibility to finance and organize a system to meet the costs involved in complying with EPR. The brand websites were accessed (between May 2015 and June 2015). Information was collected through, including information on their help lines and collection points. Subsequently, calls were made to customer care (numbers provided on the website) seeking information on E-waste disposal. Collection centre of all the brands were visited once (in Delhi or Kolkata) between July 2015 and August 2015. Emails and letters were sent to all Brands in May 2015 with a questionnaire seeking their response.

The information collected through various means was compiled and the Brands were given points on its basis. Based on their total scores, the brands were placed in green, blue, yellow and red categories.

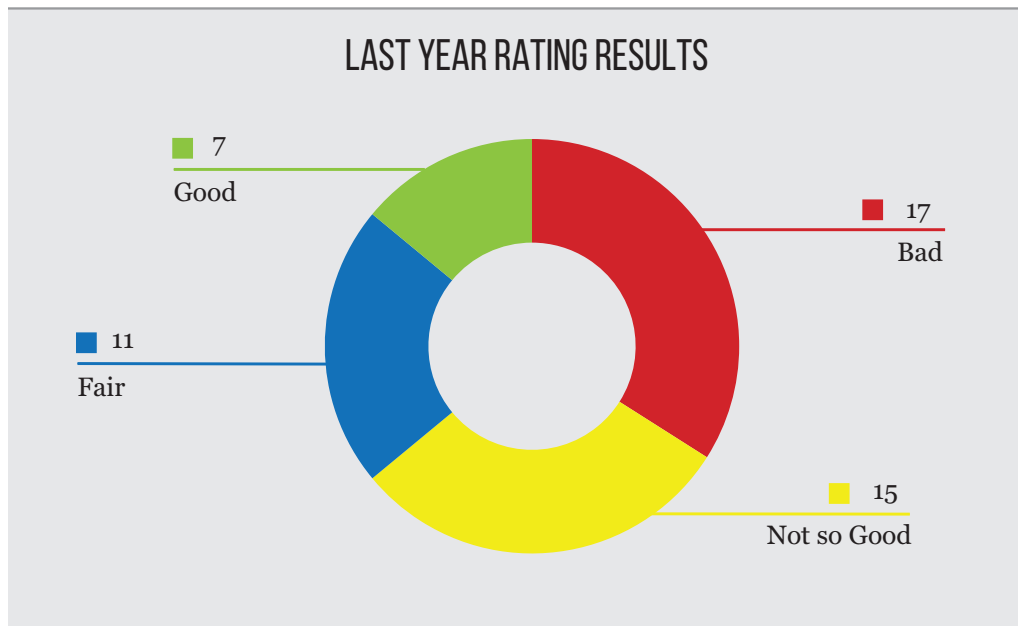
A look at the graph below makes it amply clear that the overall situation still remains quite disappointing. A large number of Producers (brands) have taken little or no action towards fulfilling their responsibility under the Rules even after three years of regulatory framework. 18 out of the 51 brands or the Producers feature in the red band, suggesting minimal or no effort towards E-waste management. The number is almost unchanged from last year. The only redeeming factor is that, except one, all other brands featuring in the red last time had scored zero, whereas this time only 7 brands have scored Zero. It is indeed surprising to see that there is no action by 7 leading brands in the country even after three years of the rules being in place.



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Another 15 top brands have done minimal and feature in the yellow band, which is same as in the last year's rating results. Though most of the brands in this



Band has take back policy, their ground infrastructure and their effort on consumer awareness seemed inadequate. Some of the leading international or multinational brands selling EEE in India have featured in this category of rating. The increase of brands in the blue band gives us some positive about good efforts, though a sharp drop in the green band is disappointing.

Brands	Sufficiency of information	Ease of Accessibility	Information in booklet	Take Back System	Products RoHS Compliant	Collection centers - all India	Authorization	Annual Returns	Collection points	Awareness campaigns	space allocated in Ads	other initiatives	customer care/ helpline provided	Take back center operational	Tie-up with authorized recyclers	Total Score
Daikin	5	5	20	15	0	0	0	0	0	0	0	0	0	0	0	45
Bluestar	5	5	0	15	0	0	0	0	0	0	0	0	0	0	15	40
Haier	5	10	10	0	15	0	0	0	0	0	0	0	0	0	0	40
Asus	5	5	10	0	15	0	0	0	0	0	0	0	0	0	0	35
Hitachi	5	5	0	15	0	0	0	0	0	0	0	0	10	0	0	35
Onida	0	0	20	0	15	0	0	0	0	0	0	0	0	0	0	35
Electrolux	0	0	0	0	15	0	0	0	0	0	0	0	10	0	0	25
HTC	5	5	0	0	15	0	0	0	0	0	0	0	0	0	0	25
Blackberry	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	15
Sharp	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	15
Spice	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	15
BPL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Celkon	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Lemon	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Maxx	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Olive	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Xiaomi	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Zen	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The eighteen brands which are in the red category and have fared worst in our rating system are listed above. It is shocking to note that 15 of these companies have not mentioned on their websites about any take back mechanism and 11 of them provide no information on RoHS compliance. Only 6 brands, out of these 18, have put information on e-waste on their website, but no information was on this platform related to

their collection centre. Only 5 Brands on this list had information in their booklet for consumers. Interestingly a large number of cell phone companies feature in this category, which was also the case last year.

None of these brands responded to our questionnaire.

Brands	Sufficiency of information	Ease of Accessibility	Information in booklet	Take Back System	Products RoHS Compliant	Collection centers - all India	Authorization	Annual Returns	Collection points	Awareness campaigns	space allocated in Ads	other initiatives	customer care/helpline provided	Take back center operational	Tie-up with authorized recyclers	Total Score
Benq	5	5	0	15	15	20	0	0	0	0	0	0	0	20	15	95
Motorola	10	0	15	15	15	0	0	0	5	0	0	0	0	20	15	95
Acer	10	0	0	15	15	15	0	0	0	0	0	0	0	20	15	90
Panasonic	10	0	10	15	15	15	0	0	10	0	0	0	0	0	15	90
LG	5	5	15	15	15	0	0	0	0	0	0	0	10	0	15	80
Toshiba	10	5	10	15	15	0	0	0	5	0	0	0	0	20	0	80
HCL	10	5	0	15	15	10	0	0	5	0	0	0	0	0	15	75
Whirlpool	5	5	10	15	15	0	0	0	0	0	0	0	10	0	15	75
Xolo	5	10	10	15	0	0	0	0	0	0	0	0	0	20	15	75
Apple	5	0	10	15	15	0	0	0	0	0	0	0	0	0	15	60
Epson	5	5	0	15	15	0	0	0	0	0	0	0	0	0	15	55
Huawei	10	5	20	15	0	0	0	0	5	0	0	0	0	0	0	55
Sony	10	0	0	15	15	10	0	0	5	0	0	0	0	0	0	55
Xerox	5	5	15	15	15	0	0	0	0	0	0	0	0	0	0	55
Philips	5	5	10	15	15	0	0	0	0	0	0	0	0	0	0	50

The good part about the 15 brands featuring in yellow category is that all of them have take back system, but the shortcoming is in their operations. Except for LG and Whirlpool, our calls to customer care numbers or help lines of Producers elicited poor response as the executives were unable to answer simple queries on e-waste. Except two companies, who did not have information on RoHS, all companies in the yellow band are RoHS compliant.

Brands	Sufficiency of information	Ease of Accessibility	Information in booklet	Take Back System	Products RoHS Compliant	Collection centers - all India	Authorization	Annual Returns	Collection points	Awareness	space allocated in Ads	other initiatives	customer care/ helpline provided	Take back center operational	Tie-up with authorized recyclers	Total Score
Samsung	10	0	20	15	15	15	5	5	15	10	5	0	10	0	15	140
Voltas	5	10	10	15	15	15	5	5	5	10	5	5	0	20	15	140
Intex	10	10	15	15	15	15	0	0	15	0	0	0	0	20	15	130
Carrier	5	5	20	15	15	20	0	0	0	0	0	0	10	20	15	125
Godrej	10	5	10	15	15	15	0	0	5	0	0	0	10	20	15	120
HP	10	5	20	15	15	15	5	0	10	5	0	5	0	0	15	120
Dell	10	5	15	15	15	5	5	5	5	0	0	0	0	20	15	115
Lava	5	10	10	15	15	20	0	0	0	0	0	0	0	20	15	110
Videocon	10	10	10	15	0	15	0	0	5	0	0	0	10	20	15	110
Canon	10	5	20	15	15	10	0	0	15	0	0	0	0	0	15	105
IBM	10	0	10	15	15	0	5	5	5	5	0	0	0	20	15	105
Sansui	10	5	10	15	0	15	0	0	5	0	0	0	10	20	15	105
Iball	10	10	0	15	0	15	0	0	15	0	0	0	0	20	15	100
Karbonn	5	5	5	15	15	20	0	0	0	0	0	0	0	20	15	100
Micromax	5	10	15	15	0	20	0	0	0	0	0	0	0	20	15	100

The Blue category has a mix of Indian and international brands. The good part has been about few brands like Karbonn, Micromax India, Iball and Carrier who had featured in our red category last time (with all of them scoring zero), making the jump to blue category. All Producers featuring in this 'Fair' performance category have takeback system and have tied up with authorized recyclers. Most of them are also RoHS compliant (based on information provided by them or available on their website) and

have information related to e-waste on their product booklet. On information available with the customer care or helpline, there was mixed status; executives of only 5 out the 15 brands in this category could respond to simple queries on e-waste. Except for 3 brands, the collection points of the brands were though operational and were receiving e-waste.

Brands	Sufficiency of information	Ease of Accessibility	Information in booklet	Take Back System	Products RoHS Compliant	Collection centers - all India	Authorization	Annual Returns	Collection points	Awareness	space allocated in Ads	other initiatives	customer care/ helpline provided	Take back center operational	Tie-up with authorized recyclers	Total Score
Ricoh	5	5	20	15	15	20	5	5	15	15	10	5	10	0	15	160
Microsoft	10	0	15	15	15	20	5	0	15	15	0	10	0	20	15	155
Lenovo	10	5	20	15	15	10	5	0	15	10	0	0	10	20	15	150

Disappointingly, only 3 brands feature in our green category this year, namely Ricoh, Lenovo and Microsoft. Among these, Lenovo and Microsoft (earlier as Nokia) were also in our green band last year. Ricoh, the topper in our current rating system, was not included in our rating last year. All the three Producers have take back system and have more than 100 collection points in the country. All of these brands have RoHS

compliant products in the market and have detailed information in their product booklet. The brands have also organized awareness campaigns, with Ricoh also allocating space to e-waste issue in their advertisements.



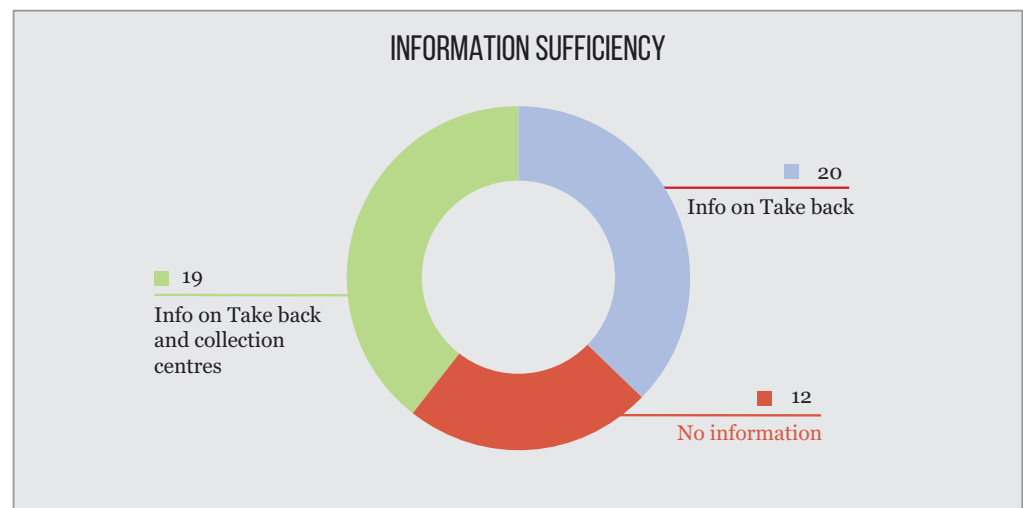
CURRENT SCENARIO



Let us look at how the brands overall have performed on the criteria that have been included in the rating system.

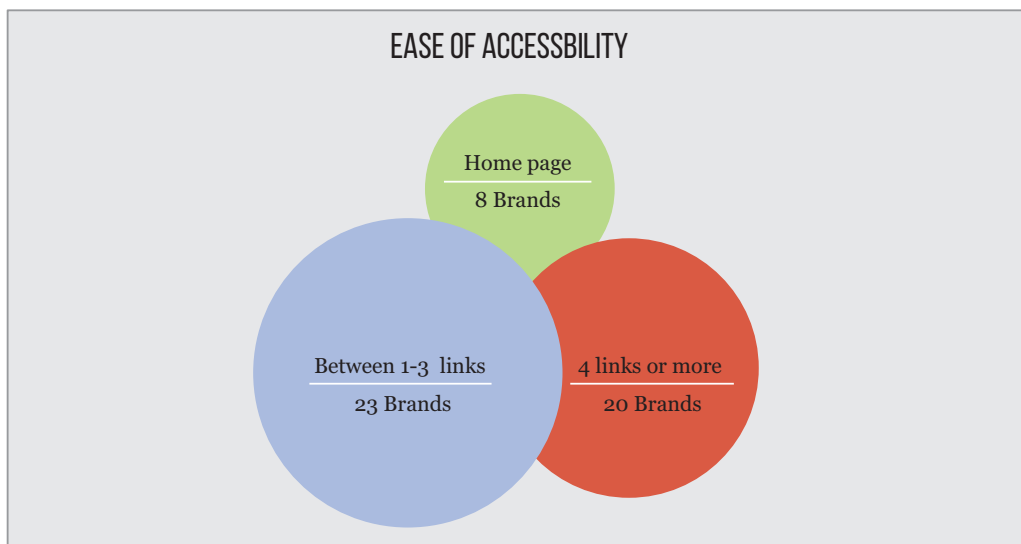
WEBSITE ACCESSIBILITY AND INFORMATION SUFFICIENCY

Producers, under the e-waste rules, have the responsibility of providing information to their consumers. Though website information is not specified in the Rules, it does remain an important interface between the Brands and their consumers. The first two criteria in the rating system looked at whether there was sufficient information related to e-waste on the Brand website and also whether this information was placed in a way that the consumers would notice it or access it comfortably. A large number of brands included, 39 out of the 51, had information on e-waste on their website, which is an improvement from the last time. Only 12 of them had no mention of e-waste or the rules or any takeback system. But among the 39, only 19 had detailed information regarding takeback and collection points etc.



The problem was more acute on the accessibility. Only 6 brands had information on either the homepage or had provided direct link on the homepage itself, making it easier or noticeable for the consumers. In most cases, the information was available on pages which would not be accessed easily, unless the consumers were looking for specific information on e-waste, which is unlikely as there has been hardly any effort to create awareness.

20 brands have placed e-waste information in pages that needed 4 or more clicks to access, practically making it very difficult for consumers to come across this while surfing the website.

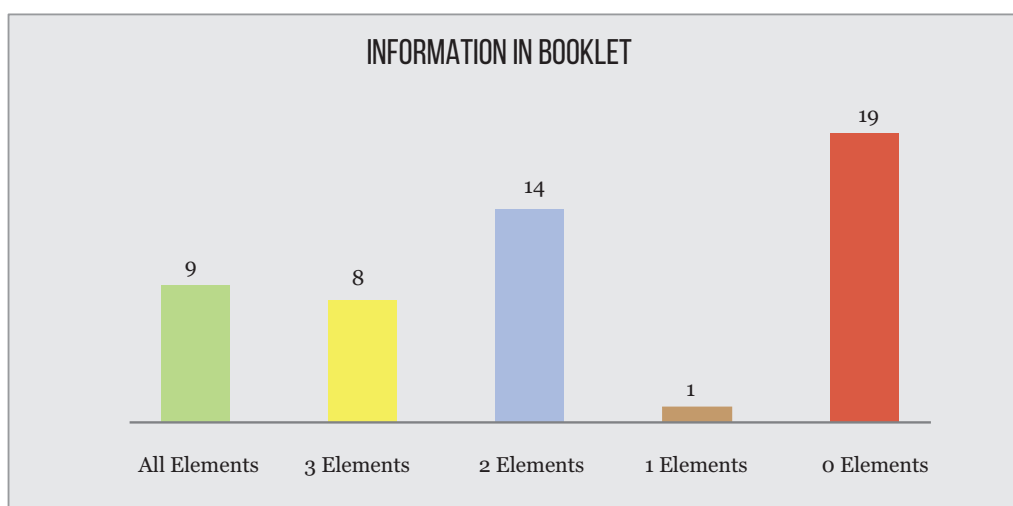


BOOKLET

When we buy a new electronic gadget, we also get a booklet or manual along with it. This manual could be another source of information for consumers about e-waste. The booklets of all brands were accessed to check whether they provided details. The elements that we looked for-

- E-Waste
- RoHS
- Collection points
- Symbol

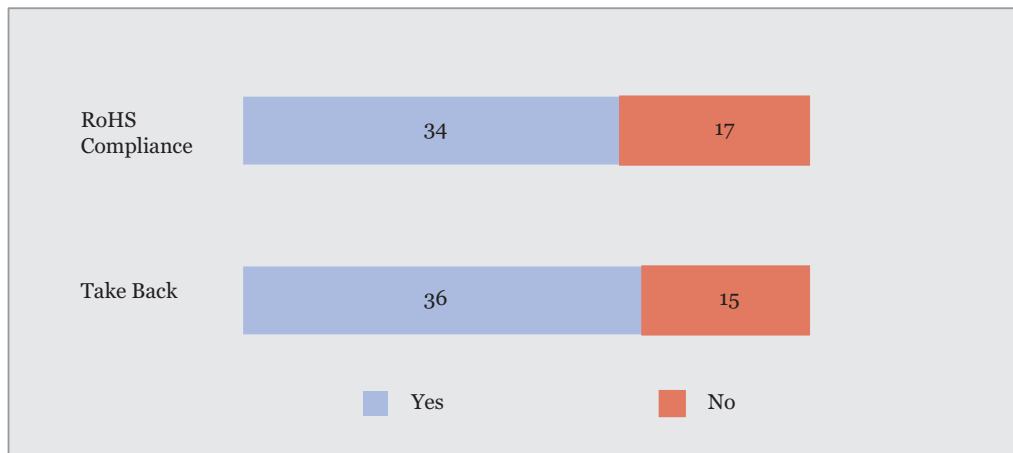
Only booklet of 8 brands had all the elements and shockingly booklets of 19 brands had not even one element.



TAKE BACK SYSTEM AND ROHS COMPLIANCE

Even after 3 years of the E-waste Rules, 15 Producers have not indicated on their website about having any take back system. Take back system which is the backbone of e-waste EPR system has been mandated under the Rules.

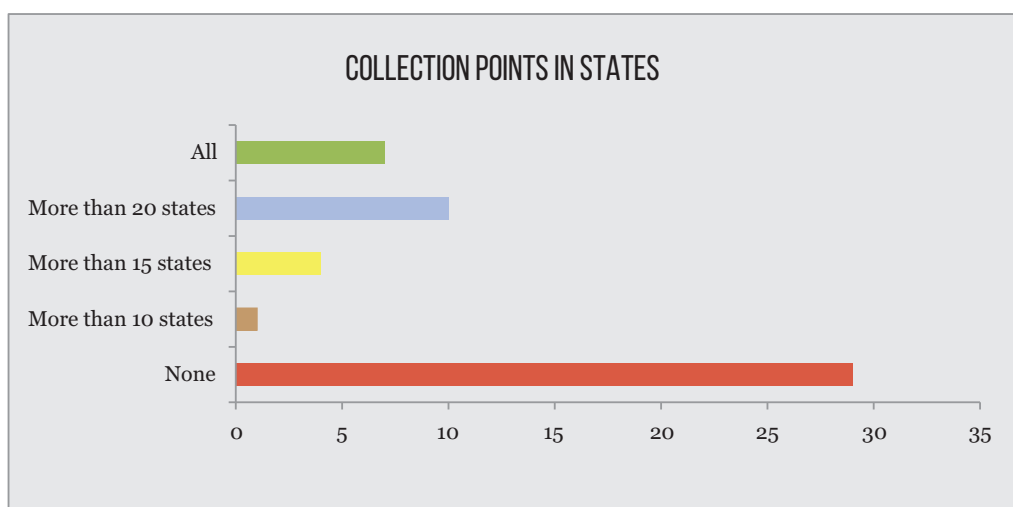
RoHS compliance which became mandatory from 2014 has also been neglected by many Producers. 17 out of the total 51 included in the study do not mention that their products have reduced the use of Lead, mercury, cadmium, Hexavalent Chromium, PBB and PBDE in their products.

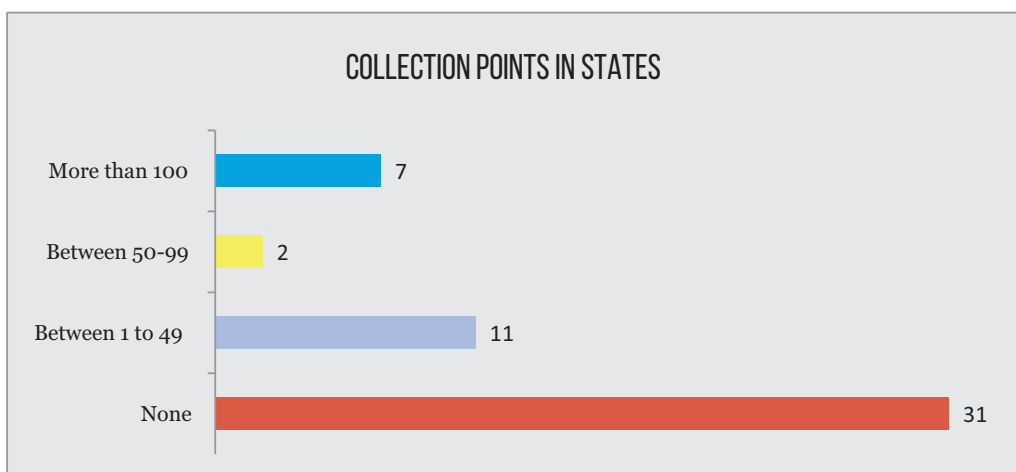


COLLECTION CENTRES

Though most of the Producers have set up take back systems, number of collection points and lack of collection infrastructure across the country is a big concern. Only 7 Producers indicated (through their website or response to our questionnaire) about a Pan India collection system. 29 Producers did not specify any. Unfortunately, this indicates that consumers have little choice or information regarding where to dispose off their e-waste.

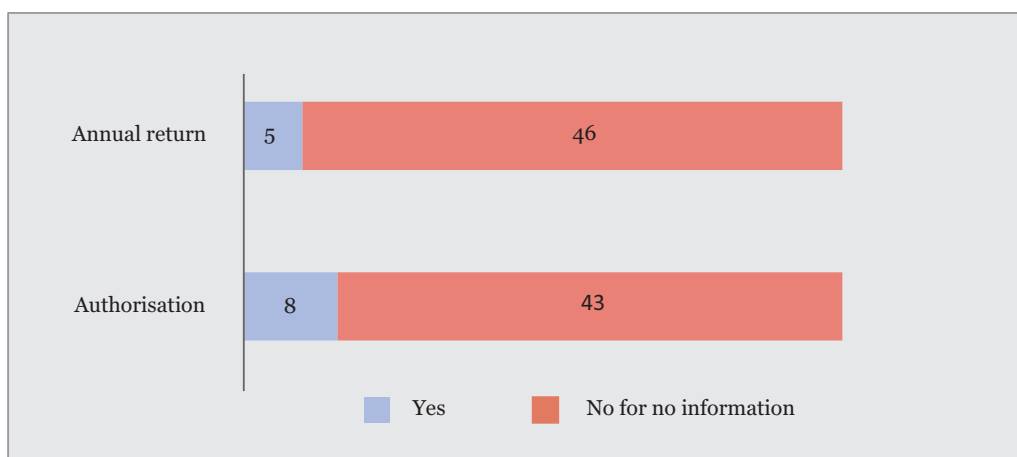
With more than a billion population, we also need a large number of collection points. The Producers were rated on basis of this criterion as well and disappointingly, most brands had limited infrastructure. This is certainly crucial as without convenience and easy access, it is difficult to get consumers to return their e-waste.





AUTHORIZATION AND ANNUAL RETURNS

Authorisation and Annual returns are two mandatory requirements to be fulfilled by Producers under the e-waste Rules. The Producers were directly asked regarding this as there is no such information available on Brand websites. Only few brands scored in these categories, as we had limited response from the brands.



AWARENESS CAMPAIGNS AND OTHER INITIATIVES

Since the response to our questionnaire from EEE Brands was limited, most brands failed to score in these rating parameters.

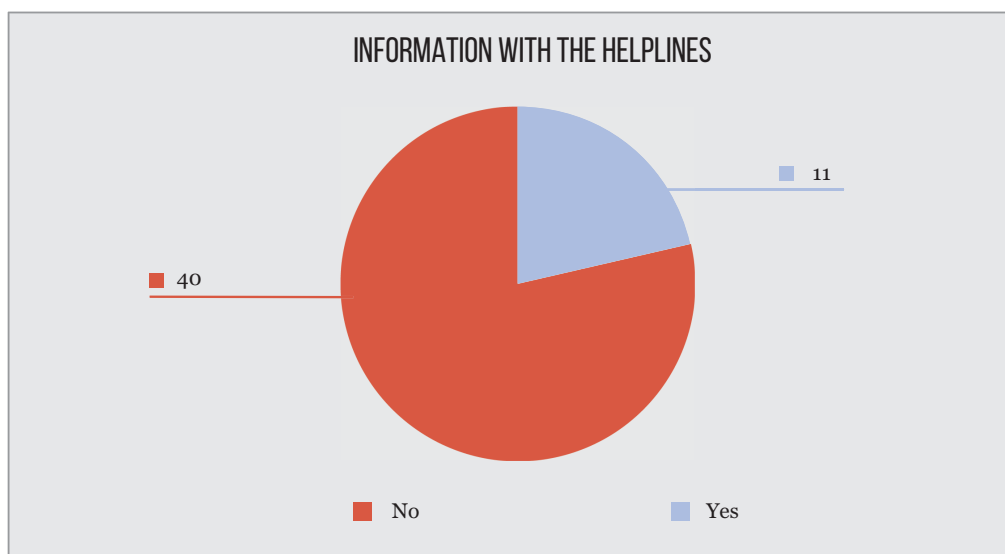
Just 7 brands had initiated some awareness campaigns in print or television (including videos) or social media platforms, with only Ricoh and Microsoft using all the three platforms. Samsung, Voltas and Lenovo used two platforms. HP and IBM have used one medium till now.

Most companies had also failed to allocate space for e-waste in their products advertisements. Only Samsung, Ricoh and Voltas allocated between 5-10% of space for this crucial issue.

The Brands had also not done much direct engagement with consumers or with informal sector. Only 4 brands namely Ricoh, Microsoft, HP and Voltas scored in this category for their work.

CUSTOMER CARE

Though most brands provided customer care numbers or help lines for consumers on the websites or product booklets, it was important to know whether these actually provided any help to the consumers. Unfortunately the answer is no, as most of these help lines could not even provide basic information related to e-waste disposal. Only help lines of 11 brands provided us with information, a staggering 40 brands did not have personals who knew about e-waste or could help with disposal of old products.



TAKE BACK CENTRE OPERATIONAL

In our last rating, we found that most take back or collection points were not operational. But this time take back centres of 19 out of the 51 brands were operational. It is still shocking to see that the collection points of large number of Brands are not functioning and are only on paper.

TIED UP WITH RECYCLER

29 or more than 50% of the Brands have tied up with authorized recyclers for their e-waste disposal.

CONCLUSION

The Global E-Waste Monitor 2014, compiled by UN think tank the United Nations University (UNU), indicated last year that India is the fifth-largest e-waste producer in the world, churning out 1.7 million tonnes of this toxic waste every year. This waste is set to grow substantially in the coming years, as the altered consumption patterns and design for obsolescence take precedence. Though this growth is inevitable, the question is whether the country has the required infrastructure and systems to deal with this, in order to minimize the negative environmental and social impacts.

The Ministry of Environment and Forests and Climate Change recognized the alarming increase and effect of improper electronics waste recycling and framed The E - Waste (Management and Handling) Rules, 2011 under the Environment Protection, Act 1986. The Rules, which were set to change the e-waste landscape in the country, have been a non-starter as a large number of Producers, the key stakeholder who had the onus to set up systems in the country, still are reluctant to take on their responsibilities. Producers were to reduce the use of hazardous substances in their products; the Rules had imposed restrictions on the Producers right at the design stage. On the other end, by introducing the concept of 'extended producer responsibility', it had tried to ensure that once the product has reached the end of its life, the Producers need to step in and be responsible for its recycling or disposal.

The study looked at these two important tasks and how have these been put into action after the Rules came into force in 2012. Unfortunately the situation is disappointing, as in a country where we have hundreds of EEE Producers, even all the top 50 Producers have not complied with the law. The efforts to reach out to consumers or make the takeback effective have been minimal, making the systems set up by most Producers only notional.

7 prominent EEE brands scoring zero in our rating system, after three years of regulatory framework, is clearly indicative of the state of things in managing this toxic waste stream.

The study this year overtly points out that though there has been some improvement from last year as more Producers have announced take-back systems, it is not enough as most of these are not operational on ground. The help-lines of 78% of the brands were not able to answer queries on e-waste, reiterating the fact that most brands have only set up these to fulfill the laws and not really fulfill their responsibilities-making the whole exercise futile.

Only 3 Producers have made it to our green band, a sharp decline from 7 last year. Probably an indication that the good work of Producers need better incentive and recognition for them to continue that in the same steam. But at this point, these brands need to be applauded as they have continued their good efforts and are making good efforts towards sustainable e-waste management. The blue band category also gives us reasons to be happy as many of these brands had featured in our red or yellow category last year and have made good progress from then. It is though shocking to see many top companies featuring in our yellow bands- many of them with international experience and knowledge of setting up such systems in other countries.

The dismal state of EPR implementation not only points out towards the lack of effort from the Producers, but also indicates that there is a need to strengthen the regulatory framework and implementation. The Rules, though with all good intent, have not been very effective and probably need stronger incentives and disincentives for Producers to act in accordance with the Rules. In the last three years of the framework, no action has been taken against any Producers (except certain notices issued), though the violations are quite apparent. Though the study gathered information from various sources, low response from the Producers to our questionnaire also indicated that the Producers are not taking e-waste management seriously.

The failure of EPR in e-waste management makes it amply clear that feasible and concrete steps need to be taken to ensure that the Producers play their assigned roles and fulfill the responsibilities put on them.

RECOMMENDATIONS

National Registry- Among the top 50 Producers included in the rating, still there are companies which have not initiated any work on e-waste. It is probably difficult to guess that smaller or lesser known Producers may fare even worse. A national registry would ensure that all producers are registered with a single body and hence minimize free riders.

State Specific collection plans- Our study clearly points out that even for the Producers who have set up e-waste takeback systems, their collection infrastructure is limited and concentrated to few large cities or select states. Since electronics gadgets have penetrated almost all corners of the country, e-waste generation is also widespread. It is therefore essential that the collection infrastructure is extensive and reaches out to almost all corners of India. During the course of our study, we saw that many states, especially in the north-east part of the country, have no collection points. A state specific plan from Producers will ensure that there are collection points in each state.

Awareness- The Producers were, under the Rules, made responsible for creating awareness through various methods and means, but the study reveals that there has been little effort on that. Probably it is important to create few compulsory mandates, for example, certain amount of space in print ads or mandatory information to be carried in the booklets/manuals etc. Awareness will remain critical to ensure that consumers participate in the process.

Mandatory collection targets- Though the study did not look at the amount of e-waste collected by individual Producers, it is evident, looking at the efforts, that the quantities collected annually would be quite small. A mandatory target given to the companies would make it obligatory for them to set up good system and also create incentives for the consumers to participate.

Incentive and disincentives- The findings noticeably reveals that there are three kinds of Producers – Some who have made good efforts, some who have initiated work and the rest who have yet to start work. Unfortunately, the current framework is not differentiating between them and neither rewarding those who are doing good work nor penalizing those who have done nothing or are blatantly violating the laws. There is a need to create some sort of a scheme which will encourage Producers to comply and go beyond it.

ANNEXURE 1:

Questionnaire sent to Producers

Kindly provide the following information:

1. Do you have authorization from SPCB/CPCB under the E-waste Rules 2011?
☐ Yes ☐ No
2. Have you set up a takeback system for e-waste collection as mandated under the E-waste Rules 2011?
☐ Yes ☐ No
3. Do you have collection points/centres in all states/UTs? Provide details of number of collection points/centres in each state/UT.
4. Provide the quantity of e-waste collected in the year 2014-15?
5. Have you submitted Annual returns under E-waste Rules, 2011 for the year 2014-15 (if yes, please attach a copy of the same)
☐ Yes ☐ No
6. Are all your products put in the Indian market RoHS compliant under the E-waste Rules 2011?
☐ Yes ☐ No
7. Does your product booklet have information on e-waste and RoHS? Provide copy of the relevant page of any one product.
☐ Yes ☐ No
8. Kindly provide details of awareness initiatives taken by you in 2014-15?
9. Have you done awareness through
TV ads ☐ Yes ☐ No
Print ☐ Yes ☐ No
Social media ☐ Yes ☐ No
(If yes kindly share the link or copy of the same)
10. Amount of space allocated for e-waste recycling in Product Advertisements
☐ 5% ☐ 10% ☐ 15%
11. Share any other initiatives taken up by you during 2014-15? For Example, Workshops, direct engagement with informal sector/communities.
12. Have you tied up with an authorised recycler for environmentally sound recycling and disposal of e-waste collected through Take back programme
☐ Yes ☐ No
13. Do you have a verification process for identifying/selecting recyclers
☐ Yes ☐ No
14. Have you created any incentive for consumers to return e-waste? If yes please share the details.
☐ Yes ☐ No

ANNEXURE 2

1	Acer	http://www2.acer.co.in/ewaste/Index.htm
2	Apple	https://www.apple.com/in/recycling/
3	Asus	http://csr.asus.com/english/index.aspx#53
4	Benq	http://www.benq.co.in/about/E-waste%20Management/
5	Blackberry	http://us.blackberry.com/recycle.html for US Prog. no info available for India
6	Blue Star	https://www.bluestarindia.com/knowledge-centre/e-waste-management.asp
7	BPL	N A
8	Canon	http://www.canon.co.in/personal/web/company/qehs/recycling
9	Carrier	http://carriermediaindia.com/e-waste.aspx
10	Celkon	N A
11	Daikin	http://www.daikinindia.com/about-daikin/e-waste
12	Dell	http://www.dell.com/learn/in/en/incorp1/dell-environment-recycling
13	Electrolux	NA
14	Epson	http://www.epson.co.in/epson_india/explore_epson/environment/epson_weee_directive/epson_weee_directive.page
15	Godrej	http://www.godrejappliances.com/green-think/take_back_policy.html
16	Haier	http://www.haier.com/in/public/public_footer/201403/t20140330_213199.shtml
17	HCL	http://delweb.hclinfinet.com/e-waste-management-initiative.htm
18	Hitachi	http://www.hitachi-hli.com/about-us/HHLI-E-Waste-Management-Initiative/
19	HP	http://www8.hp.com/us/en/hp-information/environment/product-recycling.html#.VX67cfmqpHw
20	HTC	http://www.htc.com/in/about/corporate-responsibility/
21	Huawei	http://www.huaweidevice.co.in/?q=e-waste-collection
22	iBall	http://www.iball.co.in/e-waste
23	IBM	http://www.ibm.com/ibm/recycle/in/
24	Intex	http://www.intex.in/EWasteManagement/Index
25	Karbons	http://karbonsmobiles.com/support/e-waste-management.html
26	Lava	http://www.lavamobiles.com/EntityDetail/PressReleases/LAVA%20Mobiles_Green_Initiative.pdf
27	Lemon	NA
28	Lenovo	http://www.lenovo.com/social_responsibility/in/en/sustainability/ptb_india.html
29	LG	http://www.lg.com/in/recycling
30	Maxx	NA

31	Micromax	http://www.micromaxinfo.com/e-waste-management.aspx
32	Microsoft	http://www.microsoft.com/en-in/mobile/support/recycling/
33	Motorola	http://www.motorola.com/us/Environment/Recycling/recycling-india.html
34	Olive	NA
35	Onida	NA
36	Panasonic	http://www.panasonic.com/in/corporate/sustainability/panasonic-india-i-recycle-program.html#.VX_J6_mqpHw
37	Philips	http://www.india.philips.com/about/sustainability/recycling/index.page
38	Ricoh	https://ricoh.co.in/about/environment/take-back-program.aspx
39	Samsung	http://www.samsung.com/in/samsungrecycle/
40	Sansui	http://www.sansui-india.com/environmental-activities
41	Sharp	NA
42	Sony	http://www.sony.co.in/article/503906/section/environment
43	Spice	NA
44	Toshiba	https://www.toshiba-india.com/enviroment.html
45	Videocon	https://videoconworld.com/e-waste-recycling
46	Voltas	http://www.voltasac.com/E-Waste%20Guidelines.pdf
47	Whirlpool	http://www.whirlpoolindia.com/recycle
48	Xerox	http://www.xerox.com/downloads/usa/en/e/Environment.pdf
49	Xiaomi	NA
50	Xolo	http://www.xolo.in/Green_Initiative
51	Zen	NA



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