

EPR Perspectives and experiences from India

Ravi Agarwal
Director - Toxics Link
www.toxicslink.org

Extended Producer Responsibility

New paradigm



- EPR is not CSR – it is part of sustainable business practice
- EPR is a fundamental shift from end of life- to pollution prevention – next generation
- EPR is basically a product policy (impacts of products are pre-determined)
- EPR formalizes waste sector by setting up financial cost standards and environmental standards

Key Ideas



- Product design shift
- Environmentally Sound Management of waste
- Financial responsibility
- Physical responsibility
- Information responsibility

Key determinants for EPR success

- Target setting – (India - only in new EEEE)
- Clear demarcation of Responsibility – (India - in some rules)
- Monitoring and Auditing – (India -not adequate)
- Financial management – (India - not put into practice)
- Consumer Acceptability – (yes, but not tested)
- Producer Acceptability –(India- reluctance)

India situation – EPR present in :-

- Lead Acid Batteries – since 2000
- Plastic waste rules – since 2011
- E waste rules (mostly B2B) inclusion of ROHS – 2011
- Florescent mercury based lighting – 2016
- MSW rules for some packaging and sanitary pads - 2016

Status



- **Plastic** : 8.5 million tons per annum (consumption), 6 million tons per annum is waste generation. No of authorised recyclers - 3500. Around 70% of plastic waste recycled in the informal sector
- **Lead Acid battery**. 161.7 billion INR in 2012. 4.43 million tons of waste generation. Authorised recyclers – Around 450. -In Delhi NCR 70 unorganised lead acid smelters, employing approx 840 workers.
- **Electronics industry** – around \$100 billion, Consumer electronics industry \$9.7 billion in 2014, set to hit \$20.6 bn by 2020. E-waste generation- 1.8 million tons . 138 authorized recyclers in India. 95 percent of the e-waste is being handled by the informal sector
- **Florescent Tubes** : 879 million pieces of mercury florescent light sold – appx.

Reasons for failure

Overall integrity of concept not fully implemented as yet

Recycling seen as isolated from chain of collection

Informal sector recycling and collection is rampant. Highly hazardous and unsafe - between 90 and 100%)

In E waste:

- Toxics Link carried out 2 studies to assess EPR performance in Electronic Brands.

Time to Reboot I - 2014

Time to Reboot II - 2015

18 out of the 51 brands or the Producers feature in the red band, suggesting minimal or no effort towards E-waste management.

7 brands have scored zero.

Only 3 brands in the green category

Informal sector - imperatives

Success of formal EPR inversely depends on size of informal sector (low base cost/ multiple collection points/ fees incentives not clear)

Several places and possibilities to integrate. Collection plus disposal activities for example

Informal sector can be collectivized or privately employed or as a combination of both.

Experiences from Switch Asia Project - Kolkata

- Formalisation is a long and tedious process more feasible for large traders - does not benefit the workers or small units owners.
- Difficult for informal recyclers to compete
- Integration has worked much better in the solid waste domain.

Suggestions

- South Africa/ Brazil/ Ghana/ Egypt/ Philippines/ Botswana amongst others have various documented experiences – there could be others

Peer to peer learning network can be formed.

Dedicated team looking at EPR implementation



