

**Multi-Stakeholder Policy Dialogue:
Addressing E-Waste Challenges and Opportunities
Through Public-Private Sector Cooperation**

**Position Paper:
The Views of E-Waste Recyclers in the Caribbean**

There is mounting international concern over the large quantities of used and end-of-life electrical equipment that is accumulating in countries around the globe. In developing countries, the rate of increase of the volumes of e-waste that are building up is cause for concern owing to their potential public health and environmental impacts.

In the Caribbean, there are challenges to the environmentally sound management of e-waste given the limited land space of the small island developing states (SIDS) as well as the limited landfill capacity. There is a need for the development of a sustainable e-waste management system in order to address existing environmental problems, but more so to take advantage of the opportunities of e-waste as a resource.

In light of the upcoming Multi-stakeholder Policy Dialogue in Osaka, Japan, on the topic “Addressing e-waste challenges and opportunities through public-private sector cooperation”, a meeting of Caribbean recyclers was held in order to better understand the needs of those involved in the industry. The objective of the meeting was to gather opinions on the needs of recyclers in the Caribbean in terms of an enabling policy framework to make it worthwhile for the private sector to invest in ‘green’ recycling operations.

The key points arising out of the discussion include the following:

Parties consenting to be served by the Centre:

Antigua & Barbuda Commonwealth of the Bahamas Barbados Belize The Republic of Cuba The Commonwealth of Dominica The Dominican Republic
The Republic of Guyana Jamaica The Republic of Trinidad and Tobago The Federation of Saint Kitts and Nevis Saint Lucia Saint Vincent and the Grenadines

Local definition of the term 'e-waste'

In much of the Caribbean, there is no formal definition of the term 'e-waste'. As such, there are difficulties posed with regard to what exactly can be classified as e-waste. In addition, there is a lack of statistical data to support what goods could be termed as 'electrical' or 'electronic' in nature. Participants called for a formal definition which would greatly assist in the categorisation of goods and therefore their end-of-life management.

Legislation, Regulation & Enforcement

Caribbean recyclers lamented the lack of appropriate legislation and supporting regulation for e-waste recycling. Currently in Trinidad and Tobago, there is a draft National Integrated Solid Waste/Resource Management Policy aimed at integrating both a policy and regulatory framework which shall provide a national focus for the industry. The policy is undergoing public consultation and is awaiting further approval. Similar policies and legislation exist in Guyana, Jamaica and Barbados but the other islands and territories in the Caribbean lack those formal regulations. It should be noted that even in the countries where environmental legislation is present, there are no specific pieces of local legislation that address e-waste and hazardous waste and thus a "bridging of the gap" exercise is required to bring local legislation in line with international legislation and the Basel Convention to facilitate an enabling environment for life-cycle e-waste management.

In addition to legislation, an efficient system of enforcement of the law was identified as being crucial in e-waste management. It was identified, however, that the substantial policing requirements necessary for the issuing of penalties and fines would place great strains upon the already limited resources available in these countries.

The option of voluntary compliance as a mechanism to encourage public co-operation in the collection of e-waste was considered. However, recyclers stated that government assistance would still be required for such a scheme to be successful.

Economic and non-economic incentives

In order to support the growth of the recycling industry in the region, which all stakeholders agreed was still in its infancy, the stakeholders requested the granting of tax incentives and the subsidising of costs associated with e-waste recycling in order to encourage growth in the industry. Another suggestion made was for the granting of 'green levies' and rebates to companies / organisations for the return of electrical equipment to distributors and/or manufacturers for appropriate disposal.

Participants expressed the degree of difficulty in accessing funding from private sector banking, as well as government sources, for recycling projects, challenges in obtaining permits and shipping problems. All of which they suggested could be made easier or more accessible.

It was noted that there is a lack of will by households / persons to pay to have their e-waste appropriately disposed of, whereas there is a more favourable reaction by members of the business community to paying for the proper disposal of electrical and electronic equipment.

Dialogue with other key stakeholders

The importance of the role of other stakeholders was highlighted. A specific example was given of the situation in Trinidad and Tobago where since 2010; the Ministry of Education has been awarding approximately 20,000 laptops every year to students writing the Secondary Entrance Assessment Exam (transition exam from elementary school to junior high school). Given the large volume of laptops, it was highlighted that the situation would be ideal for the negotiation of a 'take-back' policy with the supplier of these laptops as the average life of a laptop is 3-4 years.

In addition, the distributors of electrical and electronic goods were identified as another key group that should be engaged. The recyclers pointed out that the volume of e-waste generated in the individual countries negated the feasibility of dealing directly with the manufacturers of computing and electrical goods. It was suggested that it would be more feasible to deal with the distributors of the computing and electrical goods. However, it was suggested that there was a possibility of dealing with manufacturers, if the effort was done at a regional level.

Municipal collection of e-waste

Participants proposed the expansion of the role of the municipal system of waste collection to also include the collection of e-waste. This 'piggy-backing' on the municipal garbage collection system shall serve as a means of reducing the cost of collection as well as ensure a steady supply of resources for e-waste recyclers. In Trinidad and Tobago, previous efforts at e-waste segregation were unsuccessful due to a lack of motivation and limited project sustainability due to finite funds. It was highlighted that the costs associated with collection and processing act as a deterrent to distributors. Added to which, the lengthy process in attaining rebates from manufacturers is another demotivating factor to the re-take of end-of-life electrical and electronic equipment.

Regularisation of the e-waste recyclers

In the region, the e-waste recycling sub-sector is quite small involving only a few players. In light of this, there was a call for the protection of local companies against the infiltration of large foreign companies so as to maintain a sustainable local industry. Added to this was a desire for the regularisation of the industry to entail the registration and licencing of e-waste recyclers in order to maintain a certain standard/level. Furthermore, there was a call for the development of a formal network of distributors for their proper involvement in e-waste management. This is so that the use of the authorised dealers' network could serve as a potential source to effectively implement a 'take-back' policy.

Proposed solutions

Arising out of the discussions with the recyclers in the Caribbean, it can be summarised that:

- 1) A formalised mechanism is needed from Caribbean governments in order to encourage private sector involvement in the recycling industry. A way in which this can be achieved is by the formation of a formal committee comprising of members of both the private and public sectors to collaborate on issues affecting the e-waste recycling sector to assist in the development of an effective e-waste management system.
- 2) Support is also needed in the form of a guaranteed supply of e-waste to recyclers otherwise the private sector would be reluctant to make investment in plant and equipment to do more than just collect and ship overseas.
- 3) Given the developing e-waste situation, sole reliance upon the government is not feasible, but in order to attract the private sector a series of incentives should be offered, as well as the enacting of appropriate legislation which supports e-waste recycling and the facilitating of the process in reference to shipping and permits.
- 4) There is need for a plan of action which clearly details the initiatives to be undertaken which will aid in the effective implementation of e-waste management strategies. Additionally, in order to attain effective e-waste management, there should be involvement at the level of manufacturers (as a region) in order to benefit from economies of scale and distributors (at a national level) in the efforts to take back end-of-life equipment. Further assistance can be granted to recyclers through the identification or formation of alliances with nearby e-waste processing centres such as the plant located in El Salvador as a guaranteed point of sale for e-waste components.

- 5) In the long term, it is hoped that 'green' technologies would be applied to the production of electrical and electronic equipment which would then decrease the volumes of hazardous materials found in such equipment. Above all, categorization of electrical and electronic equipment would be crucial in the e-waste recycling process.