



IPEN Intervention on Item 5(C) EPI – Hazardous Substances in Electrical and Electronic Products

16 December, 2014

Thank you Mr. President.

I am Imogen Ingram from ISACI and I am making general comments on behalf of IPEN and its more than 600 member organizations.

This is one area where we can say we have a framework that encompasses upstream or design activities; midstream activities which cover manufacturing and distribution; and downstream activities that deal primarily with waste. Good recommendations came out from the 2011 Vienna workshop on e-waste, and these should be adopted and operationalized.

The product range covered is not merely computers but a wide range of household products. The OEWG2 information documents include a paper prepared by ITU which indicates that even in such a well-ordered infrastructure as exists in Belgium, up to 30% of e-waste disposal is not accounted for.

We believe that even in the short time period of 2015-2020, it is feasible to undertake risk-reduction activities to advance progress, which would particularly assist developing countries. Useful documents in this regard are OEWG2 INF2 and INF14. INF14 sets out suggested best practices, many of which can be implemented immediately. These include:

1. Re-design of products to reduce and eliminate the use of chemicals of concern and hazardous substances in their production by substituting safer alternative chemicals;
2. Quality assurance of business supply chains by tracking and labelling which discloses the presence of hazardous chemicals in the manufacturing, use and end-of-life stages of electrical and electronic products;
3. Green purchasing strategies and procurement policies undertaken by businesses and governments;



a toxics-free future

4. Extended producer responsibility policies of businesses and Governments such as takeback of discarded products. In keeping with the Rio Principles of “Polluter Pays” and “Precautionary Principle”, it is important to for global manufacturers to develop uniform global schemes to cover **all** recipients of their products and to avoid “free riders” among manufacturers.

We suggest the addition of other risk-reduction actions, such as:

-Inclusion of public interest groups in **all** the global workshops on hazardous substances related to e-products. E-waste is recognized as a rapidly-increasing stream in developing countries where secondhand and end-of-life products are transported into developing countries under the description of items for repair. It is notable that the definition of e-waste was vigorously debated at the Basel OWG9 in Sept. 2014, as many participants wished to avoid this.

-Labelling and the definition of waste are important when considering use of recycled materials in household items such as carpet underlay and furniture. We note a gap in that OEWG2.INF14 does not consider brominated flame retardants (BFRs).

-Public right-to-know about chemicals in all stages of the lifecycle of electronics should be promoted in future work. E-waste is often spoken of as a resource, leaving the impression that proponents are not aware of the hazardous substances contained within it that require proper disposal in order to avoid harm by inappropriate disposal.

To conclude, we reiterate that a good outcome from this meeting would be to include recommendations for some implementable activities that during the period 2015 to 2020 would assist in minimizing the impacts of e-products on human health, especially vulnerable populations, and the environment.

IPEN looks forward to making more detailed interventions at any discussions in contact groups.

Thank you Mr. President.