

# FOR THE RESPECT OF SHE (Safety, Health & Environment) NEED TO DEAL RIGOROUSLY WITH HE (Hazardous Elements)



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committed by the human beings the nature keeps applying its own recycling technologies like earth quakes, tsunamis, glacier melting, global warming etc. to maintain itself to the extent possible but at an unimaginable costs & damage to the lives on this planet. For the sake of our convenience, we call these tools of recycling of the Nature as “Natural Calamities”.

It is trendy to talk about Environment & Climate Change and incidentally every single person has a brilliant idea to rectify the mistake made by the other and the same set of people keep making an emotional statement, “we need to take care of the nature & natural resources since we have borrowed the same from our children.” Such big statements have become part of our day to day lives along with theoretical, non-implementable, ineffective & impractical ideas.

**A**s we keep growing; our shadow grows in proportion. We can't get rid of our own shadow but have to deal with it consciously & responsibly to avoid any harm to self & others. It is equally true that farther we move away from the sun (nature), our shadow enlarges further. Knowingly or un-knowingly, we have come far away from the nature and still talking only or blaming each other rather than taking

corrective steps. Very surprisingly, we also know for sure, that our survival is possible with Cleaner & Greener environment only otherwise we may extinct but still we need legal system (or “Dandamental” approach) to remind us that life does not exist without breathing clean air, drinking clean water and eating non-poisonous food.

Irrespective of the mistakes being

The word “Green” is also being abused in several ways like walls painted with green colour, installation of artificial green coloured plants etc. Some people also feel proud by planting a few “Natural” trees but spend disproportionate number of papers (made from trees) on its publicity. There are thousands of ideas available with millions of people even then, we could not move ahead an inch to resolve the

problems associated with the climate change, waste disposal, natural resource replenishment, equilibrium balancing to avoid natural calamities and these are the reason why nature is showing its different colours across Globe.

At the same time, there are some persons, who really spend their time, money, efforts and work to bring impactful change. These unsung heroes do not make noise but keep adding value to the lives of all of us.

### Electronic equipment is life and e-waste is a shadow:

Increasing consumption of electronics coupled with buying power, rapid change in technology, development of smart cities, automation & digitisation, cashless transaction, need of speed etc. put together leads to faster replacement of EEE and corresponding quantum of WEEE. Although, the ROHS Directives may have contributed in reducing Hazardous Elements (HE) contained in the new EEE, including mercury, cadmium, lead, chromium and other ozone-depleting substances but these will be found in the WEEE for many more years to come. Hazardous elements in EEE are a major concern while recycling WEEE and if not done properly e-waste is not only harmful to the environment but will also result in the loss of valuable resources.

### How HE in WEEE impacting lives:

As we all know, more than 95% of e-waste is collected and dismantled in unscientific manner in our country and to curb this, Central Government notified E-waste Management Rules, which became effective since 1st Oct,

2017. These Rules are based on the globally accepted Extended Producers Responsibility (EPR) concept along with targets for the Producers to collect back certain % of the quantum of EEE placed in the market from end user and get them recycled at the authorised recycling facilities.

The above targets start from 10% to reach to 70% in certain number of years. **The Rules are silent about who is responsible for the collection & treatment of the balance quantity over & above the target levels which is as high as 90% in the beginning and 30%, when 70% target is even achieved(!). It is also unclear, who will be held responsible for the remaining quantity beyond stipulated targets, if found in the unorganised market!**



As per an estimate more than 500,000 people are associated with the e-waste collection to dismantling activities across India and time & again it has been recognised that they are the most effective medium of door to door collection but not beyond that. There are several reasons to suggest restriction on their role, which includes:

a. Informal waste workers spend almost 40% of their earnings only on medical expenses

- b. Generally, their life span is less than 60 years
- c. In case, if the person lives beyond that age, he or she may be mostly bed ridden and in true sense becomes a liability for the next generation
- d. Children hardly go for any formal education
- e. Ladies are the worst sufferers in the family without a social life

Until & unless, the informal sector does not stop their rudimentary style of dealing with the shadow (e-waste) of electronic equipment, they will continue to harm themselves along with the neighbourhood.

### Huge investment in Smart Solution but no assurance of e-waste by the Law:

The above facts are not exclusively known to the writer. Fortunately, 9 out of 10 stakeholders know this but one who invests in the appropriate solution gets discouraged because the Rules do not assure required quantity of e-waste for recycling to sustain investment, in spite of uninterrupted generation of WEEE. **Over & above, hundreds of dismantlers & re-furbishers have become part of the organised supply chain of e-waste, while their solution and infrastructure still remain a big question mark.**

Therefore, as of now, no impactful change has been noted between the regulated and unregulated scenarios except a few thousand tons of e-waste have been collected and processed by the formal entities, who are equipped with necessary technologies and infrastructure to handle such complicated material in an appropriate manner.

If we seriously analyse the reasons for such a poor success, we will find the following:

1. Huge Capital Investment in a recycling facility to meet the environmental norms v/s negligible investment as a formal or informal dismantling set up, makes formal recycling business unviable.
2. Revenue expenses of a Recycler as compared to the family driven business of a Kabadi are not at all comparable and hence it is not possible for a formal stakeholder to compete.
3. Number of EEE Producers & Bulk Consumers, considers WEEE as one of the revenue sources rather than responsibility towards a cleaner environment.
4. Lack of Reverse Logistic Network, drives the small generators to the present informal market.
5. As of now, there are hundreds of authorised dismantlers & recyclers in the country with a total annual installed capacity of 500,000 MTPA, this present capacity is far beyond the Targets laid down in the Rules, discourages serious investors.
6. All the above factors enhance cut throat competition amongst formal recyclers & dismantlers, further makes some of the heavily invested & environment friendly facilities unviable.

There is no short cut for fully compliant environment friendly solution until all the stakeholder do not start playing their respective roles effectively and soonest:

1. Policy Makers & Regulator: Stricter Implementation of the Law, Financial Incentive, Control on informal activities
2. EEE Producers: Provide Collection Centre & Reverse Logistic Network

or pay appropriate fee for actual collection & proper recycling

3. Bulk Consumers: should chose to hand over or sale to organised facilities
4. PROs: must coordinate between various stakeholders, regularly audit different facilities & service providers and keep track on target achievements with the Producers for an update to the Regulator.
5. Recyclers: must deploy environment friendly technologies and effectively deal with Hazardous Elements (HE) as per the Rules.

Dismantlers, Re-furbishers & Collectors must get linked with the Recycler(s) and movement of e-waste must be verified with documentary evidences by the third-party auditing team.



#### For the respect of SHE:

To implement leakage proof & environment friendly system in place, we need to integrate informal e-waste collectors with the formal recyclers. In

this direction and to achieve the desired result, **we need to implement Rule 12 of the E-waste Management Rules, 2016, under this provision, Skill Development for the workers associated with the Dismantling & Recycling of E-waste Activities has been made mandatory and the State Governments need to facilitate such centres with its support.**

It may not be out of place to mention that to provide above service, Ecoreco Enviro Education Pvt Ltd (a subsidiary of Eco Recycling Ltd and a funded partner of NSDC) has developed various courses and started Training Centre in the best interest of the informal workers and new aspirants, who considers e-waste recycling as an opportunity to serve the environment & also build career.

**Last but an equally important submission is that we should restrict awareness / education / training campaigns only to the extent of individuals / organisations responsible for handling of such climate related issues and not that the entire population of the country be burdened with the awareness of one more problem. If we restrict as suggested, we may save billions of dollars spent on awareness of the 1.3 billion public of the country and the same money we can deploy on developing infrastructure for disposal of Hazardous Elements (HE).**

**Let's work together to develop "E-waste Mukta Bharat; Swachh Bharat".**

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