

Scientific and Technical Advisory Panel

The Scientific and Technical Advisory Panel, administered by UNEP, advises the Global Environment Facility
(Version 5)

STAP Scientific and Technical screening of the Project Identification Form (PIF)

Date of screening: February 14, 2014

Screeener: Christine Wellington-Moore

Panel member validation by: Hindrik Bouwman
Consultant(s):

I. PIF Information *(Copied from the PIF)*

FULL SIZE PROJECT GEF TRUST FUND

GEF PROJECT ID: 5554

PROJECT DURATION : 5

COUNTRIES : Regional (Argentina, Bolivia, Chile, Costa Rica, Ecuador, Guatemala, Honduras, Nicaragua, Panama, Peru, El Salvador, Uruguay, Venezuela)

PROJECT TITLE: Strengthening of National Initiatives and Enhancement of Regional Cooperation for the Environmentally Sound Management of POPs in Waste of Electronic or Electrical Equipment (WEEE) in Latin-American Countries

GEF AGENCIES: UNIDO

OTHER EXECUTING PARTNERS: Ministries of Environment, Health, Science and Technology, Industries, Foreign Affairs, etc. Private companies (IT, dismantlers, recyclers, waste handlers), RELAC (the regional LAC e-waste network). Other national / international Organizations, Regional Centers for the Basel and Stockholm Conventions in LAC.

GEF FOCAL AREA: POPs

II. STAP Advisory Response *(see table below for explanation)*

Based on this PIF screening, STAP's advisory response to the GEF Secretariat and GEF Agency(ies):
Minor revision required

III. Further guidance from STAP

The project objective is stated as: "To strengthen national initiatives and enhance regional cooperation for the environmentally sound management of POPs in Waste of Electronic or Electrical Equipment (WEEE) in Latin American Countries."

This PIF seeks to explore the environmental problems, root causes and barriers to positive action, as relates to e-waste in the Latin American region, and to develop components that speak to: (i) strengthening national e-waste management initiatives; (ii) strengthening national capacities on waste dismantling and recycling facilities/infrastructure; and (iii) Enhancement of regional cooperation on e-waste management. It explores the various stages of readiness across the project countries to address the problem, and in more than one place in the PIF, mentions the validity of pursuing the extended producer responsibility (EPR) as a policy tool for the countries. EPR uses financial incentives to encourage manufacturers to design environmentally friendly products by holding producers responsible for the costs of managing their products at end of life, and attempts to relieve local governments of the costs of managing certain products by requiring manufacturers internalize the cost of recycling within the product price. EPR is based upon the principle that because producers (usually brand owners) have the greatest control over product design and marketing, then these same companies have the greatest ability and responsibility to reduce toxicity and waste. (see for example, <http://www.ilsr.org/the-concepts-of-extended-producer-responsibility-and-product-stewardship/> and http://content.sierraclub.org/grassrootsnetwork/sites/content.sierraclub.org/activistnetwork/files/teams/documents/PPI-PSI-CPSC_PS-EPR-Principles_FINALwEndorsers_25.Jan_.2013.pdf).

On a related example pertaining to marine plastics, see also STAP advice on EPR in "Impacts of Marine Debris on Biodiversity" - Section 2.2 (www.stapgef.org/publications) - published in collaboration with the Secretariat of the Convention on Biological Diversity.

The project seeks to build on previous related GEF initiatives, and proposes to employ south-south cooperative action to help bring countries up to a common level of capacity.

STAP's comments:

a) Although the PIF mentions support for the extended producer responsibility policy approach, and reaching out to manufacturers during PIF development, there are no component activities that directly involve producers in the project. However, Table 3 of the PIF states that producers are considered seemingly only as "additional" or secondary stakeholders. This seems counter intuitive if extended producer responsibility is to be promoted. There should be specific activities engaging producers to help solve the problem. As it stands, it comes across as an "end-of-pipe" type of solution, with no potential to discuss redesign, recycling and material restrictions as a joint approach to the problem of hazardous e-waste. There remains therefore very limited potential for waste minimisation if the producers do not have a clear role in adjusting the WEEE life cycle. That said: EPR requires a well-designed regulatory framework to be effectively implemented. Therefore, there should be a fundamental reflection as to whether or not EPR can be an effective component of this project.

b) Following on from the first point, there is also a question of unintended consequences, particularly as relates to the energy (and other) inputs to recycling, which reinforce the need for manufacturer involvement in such projects, ensuring there is appropriate analysis of trade offs. For example: to make an item easier to recycle, the manufacturer can purposely compromise the bond between components of the electronic item, to lower the energy required to pull apart, and recycle the various components of the item. However, this can shorten the life span of the item, meaning that the consumer has to replace the item more frequently; but this ultimately increases the quantity of waste being generated, even eating into any energy gains achieved through the ease of dismantlement of the equipment.. So a balance has to be struck with the manufacturer between sturdiness and life span of any product, and the volume of waste generated and the amount of energy required (and GHGs generated) to dispose of and recycle the waste. And so it would be good to see consideration of such trade-offs as well in the project.

c) There is some assessment of the e-waste policies and capacities of the project countries, but it is not clear the standard against which they were measured. Given that for EPR implementation is dependent about the right legislative and regulatory structures being put in place, it might be worth it to do a benchmarking against those constructs that have been successfully supporting EPR eg. regional WEEE legislation such as the recast EU directive on WEEE (see <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:197:0038:0071:EN:PDF>), as well as other legislative frameworks built on more experience in EPR (eg EU WEEE - http://ec.europa.eu/environment/waste/weee/index_en.htm; EU RoHS “ 2011/65/EC - http://ec.europa.eu/environment/waste/rohs_eee/; China WEEE - <http://lup.lub.lu.se/lur/download?func=downloadFile&recordId=2202304&fileId=2202306>). Note also, that "producer" is legally defined in many jurisdictions as either the original equipment manufacturer (OEM) or importer. A re-examination of the identification of the producers in the LAC region, therefore, and their willingness to cooperate, will help to determine ability to support EPR.

d) Is there room to consider batteries within this initiative?

Mexico, in particular, has been very progressive in developing recycling and safe disposal practices for batteries in partnership with US counterparts and in collaboration with the Commission for Environmental Cooperation.

<i>STAP advisory response</i>	<i>Brief explanation of advisory response and action proposed</i>
1. Consent	<p>STAP acknowledges that on scientific or technical grounds the concept has merit. However, STAP may state its views on the concept emphasizing any issues where the project could be improved.</p> <p>Follow up: The GEF Agency is invited to approach STAP for advice during the development of the project prior to submission of the final document for CEO endorsement.</p>
2. Minor revision required.	<p>STAP has identified specific scientific or technical challenges, omissions or opportunities that should be addressed by the project proponents during project development.</p> <p>Follow up: One or more options are open to STAP and the GEF Agency:</p> <p>(i) GEF Agency should discuss the issues with STAP to clarify them and possible solutions.</p> <p>(ii) In its request for CEO endorsement, the GEF Agency will report on actions taken in response to STAP's recommended actions.</p>

3. Major revision required	STAP has identified significant scientific or technical challenges or omissions in the PIF and recommends significant improvements to project design. Follow-up: (i) The Agency should request that the project undergo a STAP review prior to CEO endorsement, at a point in time when the particular scientific or technical issue is sufficiently developed to be reviewed, or as agreed between the Agency and STAP. (ii) In its request for CEO endorsement, the Agency will report on actions taken in response to STAP concerns.
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