

Position on Extended Producer Responsibility (EPR)

Global Alliance of Waste Pickers

OCTOBER 2021

INTRODUCTION

DECLARATION

BASIC PRINCIPLES

- A. Research and identification of stakeholders
- B. Involvement and direct participation
- C. Improved packaging and management

POSITION

- 1. Mandatory and government-led
- 2. Mandate integration
- 3. Full payment and risk protection
- 4. Transparency, Oversight and Adaptation
- 5. Clear communication and training on
EPR systems
- 6. Principles of partnership and due credit

CONTRIBUTORS

INTRODUCTION

This position paper on EPR is conceptualised as a dynamic, evolving document that waste picker organisations can use to advocate for and negotiate their rightful spaces and entitlements within EPR policies and practices. It has been developed over a 3 year period that began in 2018, when organized waste pickers around the world resolved to develop a collective position in the face of increasing national interest and commitments towards developing EPR policies and proposals.

The Global Alliance of Waste Pickers and WIEGO jointly established a working group to arrive at a holistic understanding and develop a nuanced response to the impact of EPR policies on waste pickers and their organizations. This iterative process involved virtual exchanges between waste pickers and technical supporters, literature review, including review of recommendations for EPR made by waste picker organisations at national and regional levels, and the development of nine case studies on the impact of EPR on waste pickers. **Workers' education materials were designed and used to facilitate discussions with over 260 waste pickers through 21 local, regional and global workshops. The workshops enabled a baseline understanding of EPR and helped solicit and distill specific, nuanced recommendations.** This culminated in a collective position on EPR that was shared with national and local waste picker organizations and modified based on their comments. The 3 basic principles and 6 position statements were organized in a hierarchy, and articulated against the backdrop of a declaration statement that was collectively articulated by members of the Global Alliance of Waste Pickers advisory committee.

DECLARATION

We, the waste pickers from across the world, assert that Extended Producers Responsibility initiatives, policies and regulations (EPR) should acknowledge our historical and ongoing contribution to waste management and recycling. EPR should recognize that waste recovery generates a large number of livelihoods, and contributes to the incomes of millions of individuals. Our survival and that of our families, is therefore inextricably linked with waste. Despite being responsible for keeping our cities clean, and indispensable for efficient and high recycling rates since the dawn of the industrial revolution, we remain invisible. We pick and collect materials discarded by society, and add value to them by segregating, sorting, aggregating and selling them, thereby promoting both resource recovery and conservation and transforming recyclables for use in manufacturing whilst generating livelihoods. It is due to us, that our cities, coasts and environment are clean. Waste picker organizations demand that governments across the world recognize these significant contributions and stop the systemic repression of our work and lives, ultimately jeopardizing recycling rates and the mitigation of climate change and marine plastic pollution.

We represent over twenty million waste pickers, 8 million of whom are organized under the aegis of the Global Alliance of Waste Pickers (Global Rec). In the past two decades, our strength has grown exponentially. This declaration and the demands articulated here, are testimony to the phenomenal growth in our strength and numbers over the past two decades. While waste picker leaders, organizers, technical experts, policy advisors, and academicians from all over the world were involved in its preparation, waste pickers and waste picker organizations from the five continents represented by the Global Alliance of Waste Pickers (Asia, Africa, Latin America, Europe and North America) are signatories to this declaration.

DECLARATION

We call upon manufacturers and producers of goods including plastic, governments at the local, regional and national level, intergovernmental organizations and multilateral agencies, and civil society, to unequivocally recognize that no EPR system can be just, effective or socially inclusive without the participation of waste pickers and their organizations. EPR that excludes waste pickers, is an unjust, and unfair appropriation of waste pickers knowledge and innovation—an abuse of our rights that will push us to the fringes and dispossess us of our material and intellectual wealth and property, and our basic sustenance. Further, it will disrupt vibrant recyclable material supply chains and create disorder and discontent across the recycling industry. Evidence shows that EPR works better when waste pickers, as valued and recognized actors, are involved as partners in its design and implementation. Further, material recovery processes instituted by waste picker organizations are socially, economically and environmentally sustainable. Our participation in EPR as legitimate actors, partners and protagonists, under conditions of dignity and recognition, is therefore crucial.

We argue that waste picker participation and partnership will imply fair remuneration for work, as well as allied costs. We seek transparency, public recognition of our work and a tripartite forum, and direct engagement between producers, waste-pickers (and other actors in the informal recycling sector), and governments. We also demand that producers phase out non-recyclables and invest in recyclable and reusable material in their production and packaging process. These fundamental principles lay the foundation for just, sound, inclusive and environmentally robust EPR, enabling a just transition for waste pickers, and the millions of workers who sustain the world's industries.

A woman wearing a dark headscarf, a dark jacket over a purple sweater, and blue trousers is sitting on a large, worn, light-colored sack. She is smiling and looking towards the camera. The background shows a recycling yard with many similar sacks, some covered with black plastic. A metal fence with multiple strands of barbed wire is visible behind the sacks. The sky is overcast.

BASIC PRINCIPLES

- A. RESEARCH AND IDENTIFICATION OF STAKEHOLDERS
- B. INVOLVEMENT AND DIRECT PARTICIPATION
- C. IMPROVED PACKAGING AND MANAGEMENT

A

RESEARCH AND IDENTIFICATION OF STAKEHOLDERS

- A.1** A thorough and systematic research and mapping process, including an enumeration of informal waste pickers, should be conducted prior to the establishment of an EPR system to ensure that all existing actors in the waste handling system are identified and included through the planning and implementation of the EPR system. Periodic studies should be conducted to assess equity and opportunity distribution and inform changes to the system.

B

INVOLVEMENT AND DIRECT PARTICIPATION

- B.1** Involvement and direct participation of waste pickers in the formulation of the EPR public policy. It is imperative that EPR systems should be developed in collaboration with the existing and potentially impacted partners and stakeholders: waste picker organizations, scrap dealers, aggregators, recyclers and other relevant actors in the informal supply chain, along with producers and government authorities. The design of EPR systems should be an open and public process. **Waste pickers and their organizations should engage as equal partners in negotiations with government and producers to determine fees and work out implementation processes.**

BASIC PRINCIPLES



IMPROVED PACKAGING AND MANAGEMENT

Through Eco-modulation and other incentives, EPR should incentivize, fund and establish goals for:

- C.1** Complete and segregated waste collection servicing all residents, including those in informal settlements.
- C.2** Minimization of packaging (and phasing out of non-recyclable and bio-based plastics that contaminate recyclable feedstock).
- C.3** Design services for reuse and repair that engage impacted waste workers.
- C.4** Mechanical recycling targets and uniform and minimum recycled content mandates.
- C.5** The phase-out of materials containing or emitting hazardous substances which may harm the health of waste pickers or recyclers; and mandated testing of new technologies and materials to ensure their safety.
- C.6** Domestic processing of materials.
- C.7** Prioritisation of the management of non-recyclable or hard-to-recycle materials over recyclable materials with pre-existing robust, economically viable markets.
- C.8** Prevent, prohibit and eliminate climate-intensive technologies like incineration and pyrolysis/chemical recycling.
- C.9** Clear, truthful labeling of materials to ensure safe handling and processing by recyclers
- C.10** New opportunities for waste pickers and other marginalized waste sector stakeholders through shifts in materials management.



RAMNAGAR (SWACHH, 2018)

POSITION

1. MANDATORY AND GOVERNMENT-LED
2. MANDATE INTEGRATION
3. FULL PAYMENT AND RISK PROTECTION
4. TRANSPARENCY, OVERSIGHT AND ADAPTATION
5. CLEAR COMMUNICATION AND TRAINING ON EPR SYSTEMS
6. PRINCIPLES OF PARTNERSHIP AND DUE CREDIT

1

MANDATORY AND GOVERNMENT-LED

- 1.1** **EPR regulations must be** regulated, implemented, monitored, and enforced by government bodies. Governments should recover costs towards socially inclusive municipal recycling and waste management programs from producers*. The role of government bodies should be clearly defined to avoid confusion about responsibilities. EPR should be mandatory and cover the full costs of waste management, with clear, gradual and measurable targets and consistent enforcement. Where voluntary, EPR should engage the government in some form of tripartite arrangement. **Waste picker integration provisions should not be relegated to the charity or grant-making wing of government or producer organisations but structurally funded as part of the EPR system.**

* **Waste management with social inclusion means** fairly remunerating and improving infrastructure and administrative support for waste pickers and other informal waste workers that are already organized, as well as funding pathways for unaffiliated informal waste workers to improve their work through access to infrastructure and occupational safety as well as the formation of cooperatives and other types of organizations.

2

MANDATE INTEGRATION

- 2.1** EPR should recognize the essential role of waste pickers and should maintain and expand existing infrastructure and integrate existing actors from informal waste value chains.
- 2.2** EPR should maintain or establish safe and legal entry points for all waste pickers, to collect and market materials, while also supporting low-barrier pathways to organization and more formal and decent labor conditions.
- 2.3** EPR should include enforceable mandates and targets for the integration of waste pickers and their organizations in EPR systems and on all decision-making bodies and processes.
- 2.4** EPR should facilitate the contracting of waste picker organizations, giving priority to independently-managed organizations, especially Membership-based Organizations with democratic processes that maximize employment and equitable financial distribution of profits.
- 2.5** EPR should establish mechanisms to facilitate registration for waste picker organizations, aggregators, reprocessors and others at the base of the recycling pyramid to register as system and service providers.

3

FULL PAYMENT AND RISK PROTECTION

It is producers, not vulnerable actors within the waste handling chain, who should be responsible for the economic risk of weak or failed end markets for materials. To achieve this:

- 3.1** EPR should develop and institutionalise long term projects and systems that fund full costs of systems operations including collection, transportation, sorting, processing, infrastructure, innovation, and end of life management for all materials.
- 3.2** The remuneration towards implementing organizations should include payment for all services provided, including environmental costs, as well as the costs for any training, organization, infrastructure needs, access to clean water /sanitation, innovation, administration, legal advice, visibility and outreach, compliance with labour and social protection laws, and disaster response resources for service providers.
- 3.3** All workers in the system should have access to social and labour protections which are rights-based and universal in scope, governed and delivered through the state, and financed through contribution from EPR.

3

POSITION

FULL PAYMENT AND RISK PROTECTION

- 3.4** EPR for packaging, clothing/footwear, bulky waste and any other waste that ends up as litter should cover the full cost of litter collection and management and not rely on voluntary or underpaid labor. Litter collection should be designated as an essential service, and should be carried out in all places where litter accumulates.
- 3.5** EPR should include price floor mechanisms (minimum fair price) and increases based on the inflation index to shield waste pickers and their organizations from the volatility of material pricing. These price floors should be accessible to anyone selling materials, not just contracted parties.

4

TRANSPARENCY, OVERSIGHT AND ADAPTATION

- 4.1** EPR structure should incorporate a public governance committee or forum composed of interested parties that includes informal workers and other marginalized waste actors.
- 4.2** Annual independent audits should be conducted and include a full financial and socio-economic review of any management body within an EPR system; the audit should include itemized income versus expenditure, and a demographically disaggregated accounting of the employment realities (wages, benefits, contract status) of all workers in the materials' domestic supply chains. Management bodies should also report comprehensively on disaggregated material generation, collection, and sale and recycling rates. Management bodies should also be required to report the names and demographics of who sits on leadership teams and oversight bodies. All data should be made publicly available.
- 4.3** Annual public review of the system should be mandatory
- 4.4** There should be clear and accessible grievance and dispute resolution mechanisms.
- 4.5** There should be regular public audits of the integration of waste pickers and other actors in the informal waste supply chain into EPR.

5

CLEAR COMMUNICATION AND TRAINING ON EPR SYSTEMS

- 5.1** EPR should finance training and inclusive engagement so that all impacted stakeholders can plan, implement and innovate within a system. The EPR model shall be described in detail but in plain language in visual, publicly-accessible documents. All actors should receive training on EPR prior to and during the design and implementation of a system, and upon any major shift in material composition in the market.

6

PRINCIPLES OF PARTNERSHIP AND DUE CREDIT

- 6.1** Principles of partnership and credit must be developed collectively and adhered to between key stakeholders, including waste picker organizations, scrap dealers and other traders, producers, government and other actors. Waste picker organizations should be made aware of and given the chance to influence or develop, and approve or disapprove of official communications and publicity related to an EPR system that involves them. EPR systems developed in collaboration with waste picker organizations should include the organization's logo in communications about the system, and should acknowledge the role of waste pickers in designing the system.

CONTRIBUTORS

A man wearing a blue cap, a black t-shirt, and khaki pants stands in the center of the frame. He is surrounded by a massive pile of large, colorful bags (orange, green, blue, and yellow) filled with sorted waste. The background shows a clear blue sky and some distant trees. The ground is dirt and littered with small pieces of trash.

This position paper was developed after an inclusive, iterative, participatory process spanning 3 years, that engaged waste pickers and their organisations from around the world.

25 Waste picker organizations that contributed to the articulation of the position on EPR:

- Organizations of the Alliance of Indian Wastepickers (AIW), including intensive inputs by SWaCH/KKPKP, SMS, and Hasiru Dala), India
- African Reclaimers Organization (ARO), South Africa
- South Africa Waste Pickers Association (SAWPA), South Africa
- Kibera Waste Pickers, Kenya
- Kwa Muhia Environmental Group (KMEG), Kenya
- Kpone Waste Pickers Association, Ghana
- National Union of Scrap and Wastepickers of Nigeria (NUSWON), Nigeria
- Movimento Nacional dos Catadores de Materiais Recicláveis (MNCR), Brazil
- Ground Score Association, USA
- Sure We Can, USA
- Bangladesh Waste Pickers Union, Bangladesh
- Federación Argentina de Cartoneros, Carreros y Recicladores (FACCyR), Argentina
- Asociación Nacional de Recicladores de Chile (ANARCH), Chile
- Asociación Nacional de Recicladores de Colombia (ANR), Colombia
- Binnars Project, Canada
- Bokk Diom, Senegal
- Amelior, France
- Ikatan Pemulung Indonesia (IPI), Indonesia
- Association des Récupératrices du Mali (AREMA), Mali
- Association des Récupératrices de Burkina Faso, Burkina Faso
- Rete ONU, Italy
- Unión de Clasificadores de Residuos Urbanos Sólidos (UCRUS), Uruguay
- Red Nacional de Recicladores del Ecuador (RENAREC), Ecuador
- La Red Latinoamericana y del Caribe de Recicladores (REDLACRE), Latin America

**36 Representatives
of the EPR Working
Group of Globalrec
(in alphabetical order)
who contributed to
the position:**

- Alejandro Valiente (FACCyR)
- Alex Cardoso (MNCR)
- Brianne De Man (Binnerns' Project)
- Carolina Palacio (FACCyR)
- Cecilia Allen (GAIA)
- Dr. Christine Hegel (Sure We Can)
- Dr. Federico Parra (WIEGO/ARB)
- Dr. Jacqueline Rutkowski (Institute SUSTENTAR / ORIS)
- Dr. Owusu Boampong (WIEGO/Kpone Waste Pickers Association)
- Dr. Sonia Dias (WIEGO)
- Elly Ogola (Kibera Waste Pickers)
- Friday Oku (NUSWON)
- Harshad Barde (KKPKP/SWaCH)
- Jackie Flores (FACCyR)
- Johnson Doe (Kpone Waste Pickers Association)
- Juan Collado (FACCyR)
- Jyoti Mhapsekar (SMS)
- Kabir Arora (AIW)
- Karim Saagbul (WIEGO/Kpone Waste Pickers Association)
- Krishna (Hasiru Dala)
- Lakshmi Narayan (SWaCH/KKPKP)
- Lubna Anantakrishnan (KKPKP/SWaCH)
- Lucia Fernandez (WIEGO)
- Luiz Henrique Silva (MNCR)
- Nalini Shekar (Hasiru Dala)
- Neli Medeiros (MNCR-Gender and Waste project)
- Pinky Chandran (Hasiru Dala)
- Roberto Laureano (MNCR)
- Sergio Sanchez (FACCyR)
- Severino Jr. (REDLACRE)
- Soledad Mella (REDLACRE / ANARCH)
- Sunita Patil (SMS)
- Sushila Sable (SMS)
- Suzanne Caflisch
- Taylor Cass Talbott (WIEGO/Ground Score Association)
- Vidya Naiknavare (SWaCH/KKPKP)

ABOUT GLOBALREC

The Global Alliance of Waste Pickers (Globalrec) is a networking process supported by WIEGO, among thousands of waste picker organizations with groups in more than 28 countries covering mainly Latin America, Asia and Africa. Through the Global Alliance of Waste Pickers, waste pickers have taken the world stage at international climate change conferences and events to highlight the need for global policies that help, not hinder, their work.



SUPPORTED BY