

switch



EPR

EXTENDED PRODUCER RESPONSIBILITY

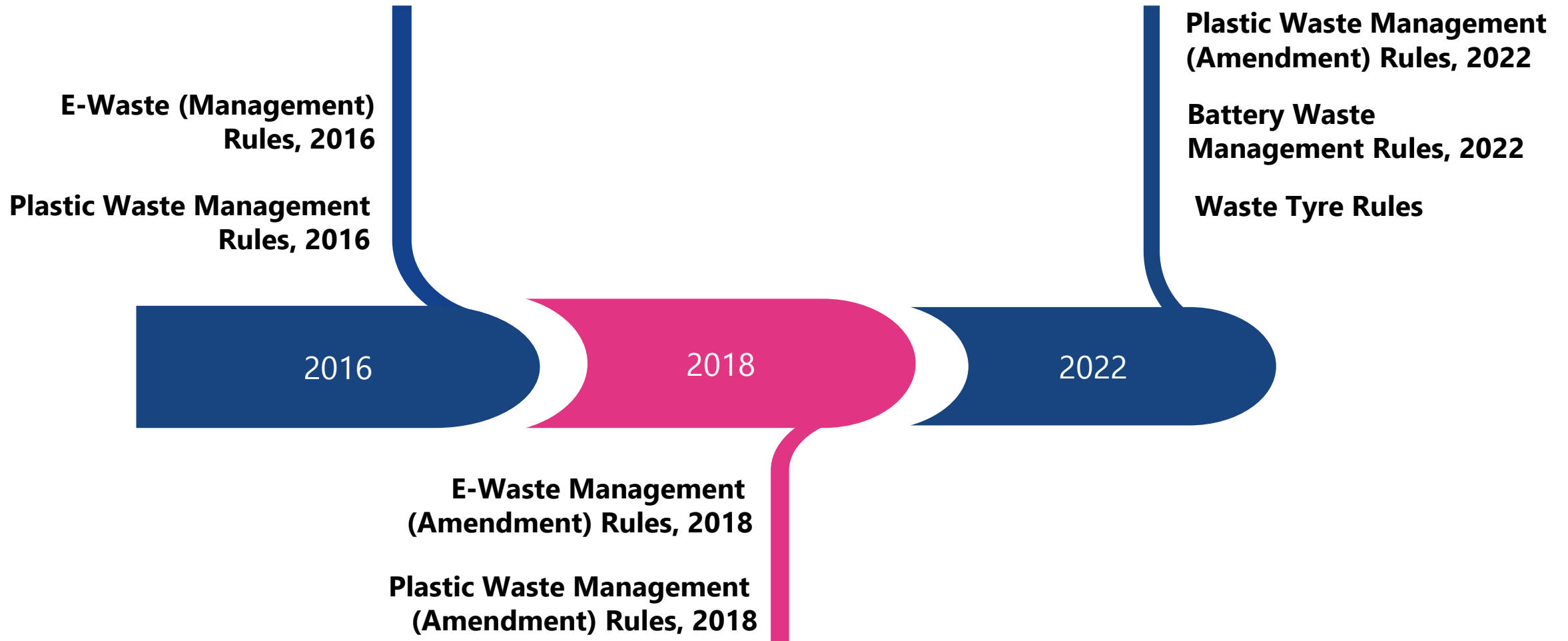
19 OCTOBER 2022

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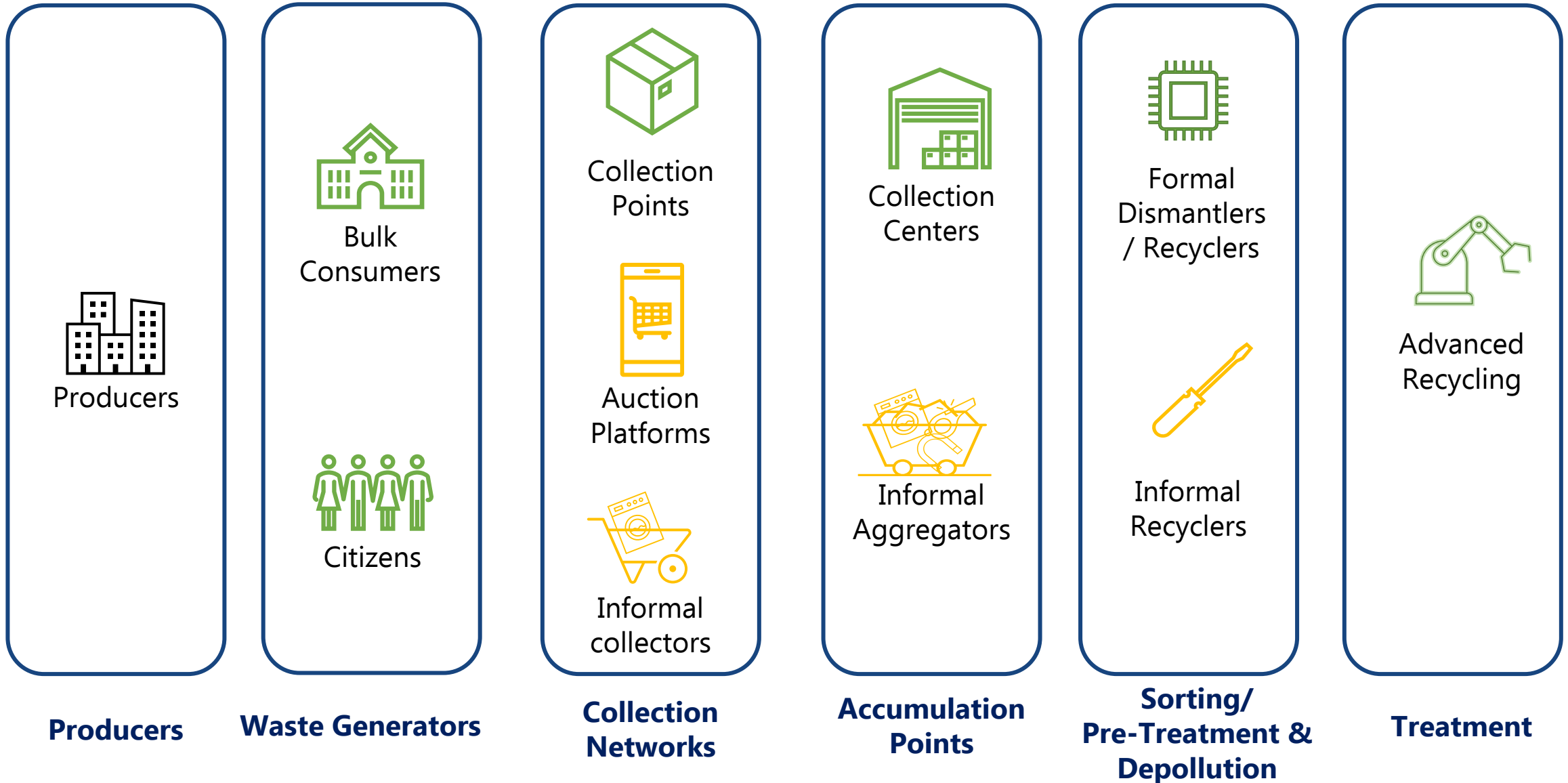
**Rethinking Extended
Producer Responsibility
from the Perspective of
Circular Economy**

Pranshu Singhal, Founder – Karo Sambhav

EPR in India



Waste Value Chain



Enable Population-scale Collection Systems

Develop New Infra + Leverage Existing Public/Private Infra

Needs

Knowledge + understanding of waste
Funding for scale

Must Enable

Ease of participation
Trust in system

Collection Sources



Households



Retailers



Service Centres



Bulk
Consumers



Aggregators



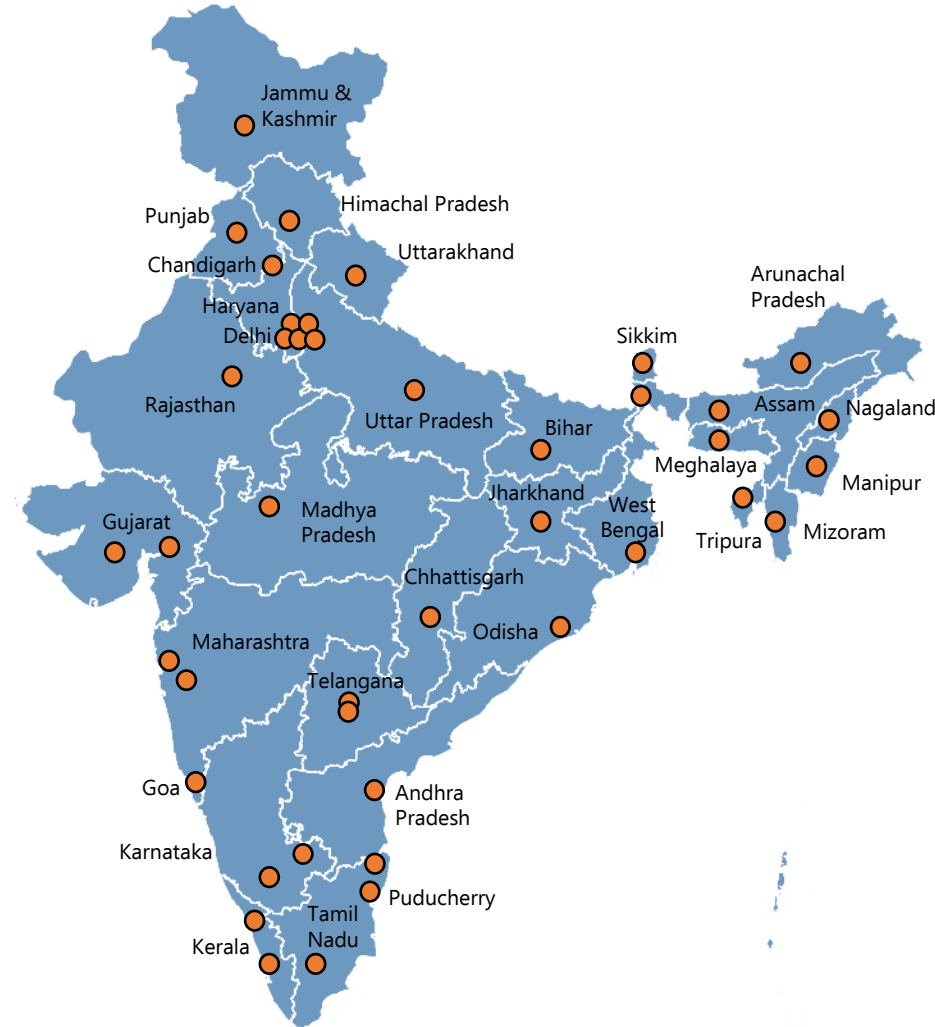
Waste
Pickers

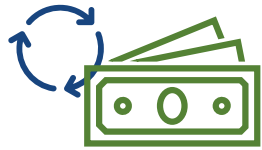


Urban Local
Bodies



Landfills





No benchmark on **Cost of Compliance** for producers

Leads to 'Race to the bottom' (lowest cost + poorest quality of collection)



Little **enforcement/analysis** of documents submitted

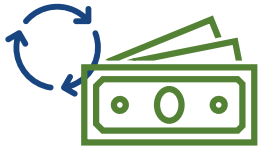
Leads to lack of level playing field, poor funding for infra (collection, recycling,...)



Absence of **digital monitoring systems** for the full value chain



Availability of **Responsible Recycling** Infrastructure



Ensure Optimal & Sustainable Finance

- Identifying the setting a cost of compliance benchmark
- Transparency in funds being spent by producers



Enabling Policies

- Create deterrence towards poor compliance by sharing data
- Build enforcement and monitoring capacities
- Create digital platforms for data collection



Involve All Actors across Value Chain

- Clear allocation of roles
- Ensure social upliftment



Enable Scalable Recycling Technology



Conduct 'Should-Cost Analysis' for all waste categories

- Procurement Costs of waste
- Logistics Costs
- Recycling Costs/Returns
- Administrative Costs



Stop => Race to the Bottom

- Waste compliance charges are hitting rock bottom
- Leading to collection on paper

Ensure a Level Playing Field

Create a level playing field for responsible Producers and PROs



Create **systems for building capacity**

- Support with Checklists, Questionnaires



Increase **enforcement across the value chain**

- Cover all types of Producers (and not just very few large producers)
- Audit PROs
- Monitor Recyclers/Dismantlers



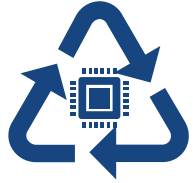
Go **beyond documentation**

- Document submission must not be considered 'Compliance'



Include **experts**

- Involve Technology/Management Institutes for regular monitoring



Set-up a National '**Circular Economy Competence Centre**' with deep expertise



Creating **audit checklists** to thoroughly assess work of

- Producers
- PROs
- Dismantlers
- Recyclers



Digitise all data and create **dashboards for decision making**

Launch WEEE Forum's **REP-tool equivalent** - harmonised reporting, analysing submitted datasets

Make **recycling and recovery data** submitted by recyclers public

- Create National inventory of secondary materials

Enable Higher Recycling/Recovery



Standardize and document **depollution and recycling practices**



Have **recovery targets** for critical/hazardous materials post collection



Submission of all data **on secondary materials**



Catalyze technology for recycling of multiple types of materials

- Critical raw materials
- Materials for which recycling solution is not available (fr-plastics, capacitors, screens, cartridges, alkaline batteries, MLP)



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