

Electronics Recycler's Pledge of True Stewardship

An initiative of the
Silicon Valley Toxics Coalition and Basel Action Network and
The Computer Take-Back Campaign
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The release of the report "Exporting Harm" in February by the Basel Action Network (BAN) and the Silicon Valley Toxics Coalition (SVTC) highlighted the fact that a majority of electronic waste including hazardous components collected by recyclers is actually exported to developing countries. There the recycling or direct dumping of the material results in a serious and immoral export of pollution to those countries. Environmental protections in developing countries are usually poor, but regardless of the levels of protections, the export of pollution to countries due to their economic status is contrary to principles of environmental justice and moreover serves as a disincentive for manufacturers to prevent hazards and wastes upstream through product design. That is, rather than internalizing real environmental costs, manufacturers have been externalizing these costs to Asians and their environment.

"Exporting Harm" added to the existent knowledge about the negative impacts of putting E-waste into solid waste management systems --landfills and incinerators - yet another way of externalizing costs - this time to be absorbed by local governments, taxpayers and communities in degraded health, contaminated water and air.

Further, yet another means of externalizing real costs for e-waste has been the use of taxpayer subsidized prison labor. BAN and SVTC share the concern of many recyclers that prisons are likely to unfairly compete with private sector recycling and thus deter the vitally needed development of a private sector infrastructure for domestic waste recycling. Further it provides a form of corporate subsidy to manufacturers for downstream pollution management, thus providing a disincentive for more appropriate upstream pollution management. For these reasons, BAN, and SVTC also seek assurances that prison labor will not be seen as any kind of solution to our hazardous E-waste crisis.

Finally, it is important that recyclers in their own operations and those of other downstream recycling and recovery operations utilize and guarantee the best industry practices in environmentally sound management.

We believe that it is necessary to separate the leaders from the leaders in the recycling industry. We believe that recyclers would be wise to move swiftly to address these serious concerns, so that consumers can be offered adequate assurances that the "right" thing will really be done with their E-waste. What is needed immediately is a list of recycling companies that will uphold a pledge of *true stewardship* for the materials they process. In this way their names and addresses can be posted on prominent websites and in brochures and consumers can then be directed to them. BAN/SVTC will publicize and maintain a posting on their websites that will list those companies that sign and continue to uphold the following pledge.

Electronics Recycler's Pledge of True Stewardship

We, the undersigned recycling company, agree to uphold the following as a pledge of true stewardship of electronic wastes:

- I. We will not allow any hazardous E-waste* we handle to be sent to solid waste (non-hazardous waste) landfills or incinerators for disposal or energy recovery, either directly or through intermediaries.
- II. Consistent with decisions of the international Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, we will not allow the export of hazardous E-waste we handle to be exported from developed to developing countries** either directly or through intermediaries.
- III. We will not allow any E-waste we handle to be sent to prisons for recycling either directly or through intermediaries.
- IV. We assure that we have a certified, or otherwise comprehensive and comparable "Environmental management system" in place and our operation meets best practices.
- V. We commit to ensuring that the entire recycling chain, including downstream intermediaries and recovery operations such as smelters, are meeting all applicable environmental and health regulations. Every effort will be made to only make use of those facilities (e.g. smelters), which provide the most efficient and least polluting recovery services available globally.
- VI. We agree to provide visible tracking of hazardous E-Waste throughout the product recycling chain. The tracking information should show the final disposition of all hazardous waste materials. If there is a concern about trade secrets, an independent auditor acceptable to parties concerned can be used to verify compliance with this pledge.
- VII. We agree to provide adequate assurance (will not provide bonds – cost prohibited per Small Business) to cover environmental and other costs of the closure of our facility, and additionally to provide liability insurance for accidents and incidents involving wastes under our control and ownership. Additionally we will ensure due diligence throughout the product chain.
- VIII. We agree to support Extended Producer Responsibility (EPR) programs and/or legislation in order to develop viable financing mechanisms for end-of-life that provides that all legitimate electronic recycling companies have a stake in the process.
- IX. We further agree to support design for environment and toxics use reduction programs and/or legislation for electronic products.

* Following the basic definitions of the Basel Convention, "hazardous electronic waste" will for the purposes of this pledge include circuit boards, CRTs as well as computers, monitors, peripherals, and other electronics containing circuit boards *and/or* CRTs. It will also include mercury and PCB containing components, lamps and devices. The definition of "hazardous electronic waste" will not include non-hazardous wastes such as copper unless it is contaminated with a Basel hazardous waste such as lead, cadmium, PCBs, mercury etc. The definition of "hazardous electronic waste" includes non-working materials exported for repair unless assurances exist that hazardous components (such as CRTs or circuit boards) will not be disposed of in the importing country as a result. The definition of "hazardous electronic waste" does not include working equipment and parts that are certified as working, that are not intended for disposal or recycling, but for re-use and resale.

** Following the definitions of the Basel Convention and its Basel Ban Amendment, developing countries are any country not belonging to the European Union, the Organization of Economic Cooperation and Development (DECO) or Liechtenstein. For a complete list of OECO countries see http://www.ban.org/country_status/country_status.html and find countries shaded in gray.

Signed  _____

Title President

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Date 3/12/03

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