

INC5.2 Observer Statement - BVRio

BVRio has three recommendations for the INC delegation on Extended Producer Responsibility (EPR) and three recommendations on Waste Collectors.

Our recommendations are inspired by; our work helping to shape EPR regulations with eight governments in Asia, Africa and Latin America, 12 years work with waste pickers in Brazil, Southern Africa and Asia, the creation of the Circular Action Hub, the world's largest directory of local waste solutions delivering social impact, and the development of our KOLEKT App which has over 10,000 active waste pickers that trade daily with buyers of recyclables and with recyclers.

Our three recommendations relating to EPR regulations are that:

1. EPR Fees need to cover waste infrastructure investments. Today most EPR Fees focus on waste collection alone, when most countries have insufficient equipment and plants.
2. EPR regulations should require traceability with collectors and direct payments to collectors. Currently most EPR fees are paid to recyclers, with almost no fees paid out to waste collectors.
3. Current EPR Regulations need to be simplified, doing away with a multitude of PROs that are difficult to monitor and hold accountable.

Our three recommendations relating to waste collectors or waste pickers are that:

1. Waste pickers should be a priority and an integral part of the UN Treaty and EPR legislation. Without informal collectors there is no recycling industry;
2. Waste pickers should have VAT and tax charges waived, because they cannot offset tax charges like normal companies can;
3. Several governments want to make digital registration of waste pickers mandatory, asking questions about their ethnicity. This is dangerous, discriminatory and is irrelevant to their ability to collect recyclable waste.

So on behalf of the 20 million waste collectors that collect 60% of global recyclable plastics, please include the world's largest waste workforce in the Treaty text.

Thank you for the opportunity to contribute.

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