

ELECTRONICS CITY INDUSTRIES ASSOCIATION

**CODE OF CONDUCT FOR E-WASTE
MANAGEMENT**

Preamble

The Electronics City is home of over 150 companies including several of the biggest electronic product brands, all large consumers of ICT with a total of approx. 60,000 staff. ELCIA is the umbrella organization representing all the companies operating in Electronics City. Realizing the need to institute proper procedures for e-waste management, ELCIA will establish a system to assist industries to manage their e-waste efficiently.

Policy

ELCIA is committed to establishing a robust system for e-waste management.

To achieve this ELCIA:

- Is committed to demonstration, sharing and adoption of best practices
- Will work towards prevention of pollution
- Will adhere to all applicable legislations or guidelines
- Will enable Safe disposal of e-waste by implementing a Clean e-Waste Channel
- And will work with all stakeholders towards Continual Improvement of the e-waste management system

Code of Conduct

ELCIA has now embarked upon setting up a Code of Conduct for all the companies under its fold for e-waste management. The code acts as a guideline for all companies who wish to find solutions for proper management and disposal of e-waste and also to fulfill their commitment to environmental protection. The various elements of the code are detailed below:

1. Membership

All member companies of ELCIA automatically become a member of this charter. The members should abide by the terms and conditions of the code of conduct.

2. Clean e-Waste Channel

A 'Clean e-Waste Channel' is

- 1) a convenient collection and disposal system for large and small consumers to return all their e-waste safely
- 2) a voluntary system for modern and concerned producers to care about their product beyond its useful life

ELCIA will make available convenient collection point/s and / or will enable setting up a convenient collection system through authorized personnel and agencies to undertake e-waste recycling.

ELCIA will also promote donation of computers or other equipment in good working condition to the needy educational institutions.

As a step further ELCIA will also enable return of the donated equipment after their period of usefulness and ensure that the authorized recycling process is followed.

3. Infrastructure

ELCIA will create the local infrastructure and facilitate collection, disposal and transportation of the e-waste generated. ELCIA has to ensure that the recycler complies with all applicable

legislations and ELCIA's best-practice standards. The onus is on the members to ensure that a proper level of inventorization is existent and initial segregation of different categories of waste is followed in their companies before the same is disposed.

The members are also responsible to ensure that they have complied with all applicable legislations/regulatory requirements which includes consents for manufacture, generation of electronic / electrical equipment or materials which when obsolete become e-waste and also ensure that custom bonding issues if any needs to be sorted out before the waste is disposed. ELCIA will collaborate with stakeholders to simplify the process of de-bonding to the extent possible thus enabling effective and timely disposal of e-waste.

4. Recycling / Disposal

It should be ensured that used equipment or parts need to be recycled or professionally disposed. To the extent possible members should explore possibilities of reuse of equipment.

ELCIA will provide a list of all potential recyclers based on recommendations from agencies like e-Waste Agency (EWA) or other sources considering the following aspects:

- Valid approvals for the vendor who recycles e-waste from the State and Central Pollution Control Boards which includes consents for Water, Air and Hazardous Waste
- Other statutory requirements like Insurance, Provident Fund etc.,
- Efficiency of the existing safety procedures

ELCIA will conduct / engage third parties to conduct site inspections of the recycling facilities in addition to the mandated requirements before the list is finalized.

5. Finance

ELCIA will work out modalities to get financial support from members for the recycling.

ELCIA will pre-finance the e-waste management in addition to support from members.

ELCIA will negotiate with the authorized vendors and will fix up the requisite fee for recycling e-waste. The applicable rate list will be circulated to all members to ensure that there is no disparity. The same will be reviewed on an Annual basis by ELCIA and modifications if any documented and circulated to all members.

The members should not focus on profitability through disposal of e-waste.

Members will help ELCIA to secure the financing of the Clean e-Waste Channel.

6. Monitoring & Control

The process of e-waste management and the recycling vendors will be directly monitored by ELCIA or subjected to third party audits regularly to ensure implementation of better controls. In case deemed necessary inputs will be provided by ELCIA / third party auditors to enhance system efficiency.

In addition to inventorization by individual companies, ELCIA will maintain a database to track donations, verify mass flows, and to allocate costs. This will be possible only if accurate data is provided by the companies to ELCIA.

7. Other initiatives by ELCIA

- ELCIA will publish guidelines on best practices.
- Awareness Building sessions and training will be held from time to time.
- Be up to date on legislation and educate members on the applicability of the laws

8. Disclaimer

It is the responsibility of individual companies to ensure that all applicable legislations are adhered to. ELCIA will not be responsible for non-adherence of the companies to any regulation. ELCIA is a facilitator and is not directly involved in the policies of the companies.