

DISCUSSION PAPER

BRIDGING THE GAP

DESIGNING EXTENDED PRODUCER RESPONSIBILITY FRAMEWORKS TO ACCOMMODATE AND ADVANCE WASTE PICKERS IN THE GLOBAL SOUTH



The importance of integrating the informal sector in EPR frameworks (plastics)

An estimated 20 million¹ waste pickers around the world, working in streets and dumpsites, play a crucial role in addressing the global challenges of plastic pollution, climate change, and poverty. Their efforts are essential to maintaining basic sanitation and upholding the human right to a clean environment for communities. Waste pickers and other informal sector workers manage approximately 60 per cent² of the world's plastic waste collected for recycling, making significant contributions to the circular economy. This highlights the indispensable role of the informal recycling sector (IRS) in promoting circularity, especially in the Global South, making waste pickers key stakeholders in Extended Producer Responsibility (EPR) systems³⁴.

EPR systems can present both risks and opportunities for the IRS, as they may shift economic benefits to producers and other actors, and introduce competition for materials. However, in places where waste pickers are organised, EPR can be a positive disruption that has the potential to finance new or existing waste picker activities. Additionally, in areas where the IRS is not organised, there is potential for materials to be commercialized informally. If this happens, it could lead to an increase in their value or make commercialization more accessible.

Despite their critical contributions, many approaches to integrating the IRS into formal waste management systems disregard the existing knowledge and systems that waste pickers have established. Policymakers and regulators, with limited insight into on-ground challenges, implement EPR regulations and guidelines without thorough consultation with waste pickers. Often, profit-driven private entities displace waste pickers, erasing their role in the process (IAWP, 2023). Framing the integration of waste pickers as an act of charity is particularly problematic, as it portrays them as passive recipients of aid rather than as knowledgeable workers contributing to economic, social, and environmental progress. This narrative diminishes their power and status as workers, while missing the opportunity to ensure a more equitable distribution of resources and profits within the materials management sector.

As plastic pollution gains attention, several countries have adopted EPR principles to address certain types of plastic packaging and waste. National frameworks in countries like the Philippines, Malaysia, South Africa, Brazil, Colombia, Chile, and Uruguay recognize the role of the IRS. However, in many places, existing EPR regulations either overlook IRS workers or risk displacing them from the value chain, threatening their livelihoods. In some cases, EPR systems have made it more difficult for waste pickers to participate, leaving them in informal, unstable roles within the system (IAWP, 2023; WEIGO, 2022). Some common challenges include lack of data availability on

the recycling landscape, restricted access to waste (Tunisia's ECO-LEF system⁵), complicated or excessive registration requirements (Chile, Ecuador), increased competition, and creation of new markets.

Across cities, grassroots recyclers have built functioning value chains for recyclables, generating income for themselves, materials for other markets, and diverting waste from landfills. EPR systems that are built on collaborative and participatory partnerships between municipalities, the private sector, waste pickers, and their organisations can enable a just transition towards reducing plastic pollution (Brazil, India's Swachh-ITC⁶).

As the international community negotiates a legally binding instrument to end plastic pollution, it is essential to understand how EPR can be designed and implemented to reduce plastic pollution, increase recovery rates, and improve working conditions in the IRS. A robust EPR system values the wisdom, local knowledge, and networks of the informal sector and recognizes waste pickers as legitimate partners. An inclusive EPR system respects traditional knowledge, innovation, and skills while creating opportunities to sustain and enhance existing systems, uphold dignity, and institutionalize decent work conditions and pathways for advancement for historically marginalized actors.



Enabling Strategies for inclusive EPR

(i) Supporting organising the IRS for inclusion in EPR systems

- A thorough and systematic research and mapping process, including an enumeration of informal waste pickers, could 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 throughout the planning and implementation of the EPR system.
- National and sub-national laws and policies could mandate the inclusion of the informal sector as a stakeholder in waste management systems.
- Periodic studies could be conducted to assess equity and opportunity distribution and inform changes to the system.

(ii) Policy recommendations for formalizing the role of the informal sector (without requiring formalization as a condition for participation) in EPR.

- Integration, recognition, and acknowledgment of the work of the IRS, as partners/service providers, and their contributions to materials management⁷ are the crucial first steps in the EPR policy frameworks.

- o EPR systems could be developed in collaboration with the existing and potentially impacted partners and stakeholders— waste picker organisations, scrap dealers, aggregators, recyclers, and other relevant actors in the formal/informal supply chain, along with producers and government authorities.
- The IRS and waste picker organisations could be made aware of and be given the chance to influence, develop, and approve official communications and publicity related to the EPR policy/frameworks/guidelines.
- EPR regulations⁸ could clearly outline how the IRS should be included in the implementation process, including the responsibilities of different actors⁹. This can be based on a systematic research and mapping process including an enumeration of the IRS.
- The regulatory framework could enable a just transition to the formal economy, ensuring equal opportunities for workers and entrepreneurs.
 - o Key measures include:
 - the provision of occupational identity cards,
 - streamlined registration with reduced fees,
 - opportunities for participation in tenders and bids,
 - safeguarding of existing service contracts, and
 - the inclusion of informal workers within EPR systems.
- It is imperative to implement robust resource efficiency policies that address the life cycle of plastics.
- o This approach not only supports environmental sustainability but also holds significant potential for creating jobs in recycling sectors, thereby delivering social, economic, and environmental benefits.
- The policy could include explicit measures to protect and strengthen existing informal waste livelihoods and economies by investing in public infrastructure and capacity building, aimed at improving working conditions and boosting resource recovery.
- Regular public or social audits can be conducted to assess the integration of IRS/waste pickers into EPR systems.



(iii) Capacity-building initiatives: training, access to protective equipment, and financial support.

- Capacity-building programs for waste pickers on EPR can be inclusive, participatory, and tailored to their specific needs and contexts, ensuring collaboration between government agencies, NGOs, and waste picker organisations.
- Key training areas include
 - o leadership,
 - o organisation-building,
 - o collective bargaining,
 - o solid waste management,
 - o occupational health and safety,
 - o policy compliance, and
 - o digital tools¹⁰ for traceability and reporting.
- Capacity-building efforts could be designed and implemented in collaboration with IRS workers and their organisations to address local needs.
- For financial sustainability¹¹, tripartite agreements between local governments (oversight, financial, technical and assets-related support), private sector and the IRS cooperative/waste picker organisations are suggested, with effective compliance and monitoring mechanisms including annual audits to verify compliance with regulatory requirements and the obligations set out in the EPR scheme.

(iv) Fair remuneration, living income, social and labour protection and sustainable livelihoods

- To ensure inclusion and protection of IRS within the system, waste pickers and relevant actors can receive universal, rights-based social and labour protections, financed through contributions like EPR and product taxes.
- Financial, material, and organisational transparency are essential for improving data collection and enabling inclusive, circular materials management systems.
- Waste picker organisations and those not formally employed can receive fair compensation for their work¹². Fair remuneration could cover all operational costs, including collection, transportation, sorting, processing, infrastructure, legal fees, data management, and training, ensuring a sustainable and equitable system.
- A robust pension system to be integrated into the social

protection framework, ensuring financial security for informal workers, including waste pickers.

- Universal, free access to high-quality healthcare could be provided to all informal workers, with a focus on improving public hospitals to ensure readily accessible services.

(v) Metrics for success

- Transparency of data, recycling rates, mapping participatory approaches and stakeholder involvement are crucial to understand the impact of new and existing EPR systems over time.
- A combination of government mandates (mandatory segregation policy, landfill bans, taxable waste discard at landfills, national inclusion of IRS in municipal waste management systems), industry/market-driven solutions (such as polymer tax, deposit-return policy, refill/reuse systems), and product design, need to work collaboratively to establish successful waste reduction and increase recycling policies.
- In the long term, it is crucial to monitor the on-ground impact of EPR on reducing plastic waste and to assess how factors such as
 - o regulations,
 - o packaging design,
 - o informal sector integration and readiness of opportunities to IRS,
 - o occupational safety,
 - o consumer behaviour, and
 - o market structure

influence the success of EPR programs.

- Principles of partnership and due credit must be developed collectively and adhered to between key stakeholders, including waste picker organisations, scrap dealers and other traders, producers, government, and other actors.

(D) References and Further Reading

1. IAWP's Vision for a Just Transition for Waste Pickers under the UN Plastics Treaty, 2023, <https://globalrec.org/document/just-transition-waste-pickers-un-plastics-treaty/>
2. A Seat at the Table: The Role of the Informal Recycling Sector in Plastic Pollution Reduction, and Recommended Policy Changes, 2022, <https://www.grida.no/publications/863>
3. IKHAPP Policy Brief Series, 2024, Fair and inclusive Extended Producer Responsibility (EPR) in the Global South, https://gridarendal-website-live.s3.amazonaws.com/production/documents/:s_document/1096/original/IKHAPP-2024-Fair-and-inclusive-EPR-in-the-global-south.pdf?1713865241
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6. Reducing Waste Towards a Just Transition, International Labour Organization– ILO Office for Türkiye, 2023, <https://www.ilo.org/publications/reducing-waste-towards-just-transition-work-labour-and-value-informal>
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8. Case studies on EPR: <https://epr.globalrec.org/case-studies/>
9. EPR and Waste Pickers, 2022, <https://www.wiego.org/publications/extended-producer-responsibility-epr-and-waste-pickers>

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Endnotes

1 International Labour Organization (ILO) (2018) Women and Men in the Informal Economy: A Statistical Picture, 3rd Edn. Geneva: International Labour Organization – ILO, <https://www.ilo.org/publications/women-and-men-informal-economy-statistical-picture-third-edition>

2 https://www.systemiq.earth/wp-content/uploads/2020/07/BreakingThePlasticWave_MainReport.pdf

3 <https://ikhapp.org/wp-content/uploads/2024/04/IKHAPP-2024-Fair-and-inclusive-EPR-in-the-global-south.pdf>

4 Extended Producer Responsibility (EPR) has gained popularity as a policy or voluntary practice that seeks to reduce waste in the environment by holding producers (companies) financially, and sometimes also operationally, responsible for recovering their products and packaging for recycling or disposal. The rationale is that EPR systems can incentivize companies to improve the packaging and products they generate (WEIGO, 2022).

5 ECO-LEF system is a public system for the recovery and recycling of packaging waste, delivered in partnership with local authorities. It barred informal workers from collection and storage points, forcing them to sell to intermediaries for lower prices than they would have otherwise received (WIEGO, 2022)

6 Brazil's Reverse Logistics system and Pune, India's SWaCH-ITC voluntary system for multilayer packaging, often rely on existing systems in which organized waste pickers have already been integrated to some degree into formal service provision. In both cases, waste pickers are contracted for doorstep materials collection, which is paid for through municipal contracts and residential user fees rather than by producers. This generates considerable savings for producers, who don't have to cover the costs of collection and other related expenses (WEIGO, 2022).

7 In places like Argentina, Colombia, India, South Africa, and the US, waste pickers have advanced from informal street and dumpsite picking into the management of buyback centers, waste collection, and material processing systems set up by the municipal authorities (IAWP, 2023).

8 In Chile, the regulatory EPR framework for packaging (2021) states that waste pickers must be registered (RETC or PRTR) and certified (National System of Certification of Labour Competencies established in Law No. 20 267) to participate in waste management and outlines that PROs must make waste collection and recovery contracts available to waste pickers. The PRO's Inclusion Plan (Article 13) indicates mechanisms and tools for training, financing, and formalising informal workers with a view to enabling the full integration of waste pickers (IKHAPP, 2024).

9 Countries, such as South Africa, Serbia, Brazil, Tunisia and the Philippines have strengthened waste picker integration as an essential component of legal recycling systems and effective waste management. These countries have been working on and leading the way to equitably include and value the expertise of waste pickers. Key examples are Brazil and South Africa, which have begun to formally integrate waste pickers into the recycling value chain, providing them with fair wages and more decent working conditions (ILO, 2023).

10 The Brazilian Recycling Atlas is a virtual tool that compiles data from waste picker associations and other actors, offering insights into their working landscape while providing information and infographics to enhance their understanding of the recycling value chain and advocate for improved conditions. <https://atlasbrasileirodareciclagem.ancat.org.br/sobre>

11 SWaCH Pune, a waste pickers' cooperative, collaborates with ITC Limited and the Pune Municipal Corporation in an EPR initiative to create market value for difficult-to-recycle materials. The program has collected over 1,000 metric tonnes of MLP waste, diverting it from landfills and reducing over 1,030 tonnes of CO2 emissions. Over 1,000 waste pickers have been integrated into the initiative, earning an additional INR 4 (USD 0.054) per kg of MLP, adding an average of Rs. 600 (USD 8.08) to their monthly income.

12 South Africa's EPR Regulation, and Bogota, Colombia's waste picker registration system both include direct transfer digital payment schemes for waste pickers per kilo of material taken to designated points – providing protection against material market fluctuations, and recognizing waste pickers for the service they provide, regardless of whether or not they are working formally or within an organization.

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