

India's Comments on the Draft Guidance to Assist Parties in Developing Efficient Strategies for Achieving the Prevention and Minimization of the Generation of Hazardous and Other Wastes and their Disposal:

- i. Objectives of the waste prevention strategies as mentioned in the Annex to the decision OEWG- 10/3, providing an outline of the guidance document, are not explicitly illustrated in the draft guidance document. Moreover, the review of the guidance document suggests no correlation between the objectives outlined and the content of the guidance document.
- ii. The guidance document lists out the categories of strategies referring to informational, promotional and regulatory strategies. However, the reference to technological strategies which form the basis of any work on Environmentally Sound Management (ESM) of hazardous and other waste which are essential to prevention and minimization of the generation of hazardous and other waste and their disposal, are completely amiss. There is a need for inclusion and elaboration of technological strategies in the guidance document for Parties to develop efficient strategies for achieving the prevention and minimization of the generation of hazardous and other wastes and their disposal, in particular, for developing parties and parties with economies in transition.
- iii. Various terms including, eco-design, green purchasing strategies, pay-as-you-throw schemes, need to be defined or elaborated upon to bring clarity in the document.
- iv. Section 1.3 provides for role of government with respect to prevention and minimization of hazardous and other waste in the form of policies, legislative and regulatory frameworks, infrastructure and institutions. It must be acknowledged that all such policies are impacted by available technologies for prevention and minimization of waste. Though, there is a reference of development of guidance tools for installations, in line with best available techniques (BAT) on waste prevention and minimization. It would have been useful if some of such BAT with respect to major sectors could have been made part of this guidance document.
- v. The planning strategies for achieving waste prevention and minimization at section 2 of the draft guidance document shall be given stakeholder wise i.e. government, business and industry,

household, as different strategies will be applicable for each stakeholder. The content lacks clarity in this regard.

- vi. The examples listed for indicators of waste prevention and minimization are limited to three waste streams only, which are similar in nature. There should be a reference of waste prevention and minimization indicators for industrial waste and e-waste. Similar section on available technological options along with examples on specific waste streams especially industrial waste and e-waste was expected as part of the guidance document.
- vii. The draft guidance on development of efficient strategies for achieving prevention and minimization of hazardous and other waste fails to take into account availability of appropriate technology options. The guidance document needs to impress upon the technological strategies with respect to best available techniques (BAT) and best environmental practices for prevention and minimization of hazardous and other wastes.

In summary, the structural framework of the document lacks clarity without leaving any scope of drawing inference. With respect to the content there is a lack of continuity between one para with the ensuing para of the document. The document fails at providing any scope of guidance for developing countries and countries with economies with transition. The document needs to be reviewed extensively in order to remove ambiguities and thus ensuring its usefulness for Parties especially developing countries, countries with economy in transition and Small Island developing states. The revised document should be shared again with the parties before considering for adoption so that the final version of the guidance document becomes an ideal document for all the parties for developing efficient strategies for achieving the prevention and minimization of the generation of hazardous and other wastes and their disposal.