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Secretariat of the Basel, Rotterdam and Stockholm Conventions  
International Environment House 11-13 chemin des Anémones  
CH 1219 Chatelaine  
Geneva, Switzerland

**Subject: Comments of Palestine on the Technical guidelines on the trans-boundary movement of electrical and electronic waste and used electrical and electronic equipment**

Dear Mr. Shafii,

Dear Ms. Valle-Klann.

With reference to your letter dated 2 Mar 2016, as it is requested in decision BC-12/5” invites parties and others to provide comments on the issues mentioned in paragraph 5 above to the Secretariat five months before the tenth meeting of the Open-ended Working Group for consideration at that meeting”

We are pleased to submit our comments on the paragraph 5 of Decision BC-12/5 on the technical guidelines on trans-boundary movements of electrical and electronic waste and used electrical and electronic equipment.

Our comments are divided into two sections; General comments and specific comments as follow.

**I. General comments:**

The proposed provision should take into consideration the case of State of Palestine which is under occupation. Being under occupation means not to be able of controlling its borders and associated problems will be faced during the trans-boundary movements of electrical and electronic waste and used electrical and electronic equipment.

More over, there is a need to compel parties not to export those electrical and electronic waste and used electrical and electronic equipment to developing

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countries and countries that do not have full control on borders or that do not have the principle infrastructure to deal with these materials correctly.

II. **Specific comments:**

- a) Residual lifetime and age of used E-equipment.

We agree with you that residual lifetime of used E-equipments should be counted from the first day of manufacturing.

- b) Management of hazardous wastes from failure analysis, repair and refurbishment.

It is recommended to obligate the suppliers of the used E-equipments that contain hazardous wastes to return these E-equipments back to the country of origin and provide a grantee to deal with them in principle of ESM, or to be treated and disposed in certified E-waste treatment facility.

- c) On obsolete technologies as cathode ray tubes.

It is well known that the cathode ray tubes technology is completely disappeared from the developed countries. in the meanwhile, large quantities of E-equipments containing cathode ray tubes are currently being used in the poor and developing countries. So we highly recommend adopting a plan or program for helping these countries to quit using of such equipments and to dispose them in a way that meets the principle of environmentally sound management.

Yours sincerely,

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