



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

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Office of
International and
Tribal Affairs

Dr. Irasema Coronado
JPAC Chair
Commission for Environmental Cooperation
393, rue St-Jacques ouest, bureau 200
Montreal, Quebec
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Dear Dr. Coronado:

On behalf of the Council, the Alternate Representatives thank the Joint Public Advisory Committee (JPAC) for its Advice to Council 11-03 on Managing E-waste in North America. JPAC's comments are valuable to Council and very timely as we endeavor to improve the understanding of the transboundary movements of used electronics throughout North America, and the role we can play as a region to stem the tide of the sheer number of used electronics being discarded worldwide. We are cognizant and appreciative of the personal and individual hard work and time committed to this activity, and your thoughtful advice is always well considered. Through our collaborative work under the CEC we will build on the various e-waste actions already being carried out domestically in each of the three countries.

Use a broader definition of e-waste: You note correctly that e-waste takes many forms beyond the "computers and monitors" identified as the focus of the Sound Management of Electronic Wastes in North America project (Project 15) in the 2011-2012 Operational Plan and urge that we expand the scope of the project to include a much wider and more inclusive definition of e-waste. We agree that the overall amount of used electronics being discarded and exported to other countries includes much more than computers and monitors and to a great extent we have embraced the wider definition. However, our goal with Project 15 is to get us started on the road to understanding the problem as it exists today across North America and is not intended to provide a definition or in any way minimize the scale of what needs to be undertaken. As was clear from the excellent presentations in the public forum held in Montreal, little hard data exists on the exports and imports of used electronics and e-waste, and at this first step is to help us estimate the extent of the problem so that we can focus our efforts in the areas of greatest need. The project is laying the foundation for understanding the trade flows and will give us the information to make better decisions, including in how to even define the problem.

Include the global players: You also note that while the Sound Management of Electronic Wastes in North America project focuses on small and medium size enterprises, there are many other actors that are much larger and are bigger players in the creation of this major international waste issue. You urge the Parties to expand the scope of the project to include the larger, more global players. While we feel it is important to focus on the small- and medium-sized recyclers and refurbishers in order to make best use of CEC resources, we also agree that the larger companies have valuable experiences to share and we hope to include them whenever possible to take advantage of their expertise.

Bring the Public onboard: JPAC is exactly on point regarding the importance of communicating and sharing information with the public of the need to improve the management of electronics across their lifecycle, including in the trade of used electronics and their exports to developing countries. We know that manufacturers are moving toward greener design of electronics with the environment in mind, from reducing toxic substances in products to more efficient, lighter and smaller packaging. Nevertheless, we recognize we still have a responsibility to ensure that all of our countries' e-waste is handled safely and responsibly throughout the lifecycle, wherever the ultimate destination may be. Therefore, we will continue to promote better, "greener" electronics without losing sight of the need to protect human health and the environment from the potentially harmful effects associated with the improper handling and disposal of these products.

Support international agreements on e-waste: You advise Canada, Mexico and the US to endorse the principles of the Ban Amendment to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. As you know, the US has not ratified the Basel Convention but is committed to pursuing ratification. Although Canada and Mexico have ratified the Basel Convention, none of the CEC Parties have ratified the Ban Amendment. However, the Council appreciates the need to reduce the burden on developing countries as they seek to manage e-waste in a manner which protects human health and the environment. CEC countries will continue to pursue these objectives both within the Basel context and in bilateral and regional efforts.

Address e-waste in procurement policies and other incentives: You advise further that the NAAEC partners focus on procurement policies support business recycling efforts through training, tax incentives and other governance that leads to more effective environmental protection related to e-waste. While these issues are important to discuss and share information across countries, procurement policies and incentives are being addressed at the national level.

Adopt a trilateral collaborative approach to the problem: Council agrees that working through the CEC, the three Parties can better understand and manage the electronic waste problem in North America. JPAC can also be assured that Council supports and will continue to advocate for further safe and protective recycling efforts and to encourage improvement in best management practices to minimize the negative impacts of e-waste across the globe.

This fall promises to be a very busy one for the Council and the Party experts. We are excited about the close working relationships we have established among our three governments at all levels, and are convinced that this spirit of collaboration will serve our shared environment well. We will continue to carefully consider your recommendations, and look forward to continued solid and constructive advice from the JPAC as we continue to improve the environmental stewardship in North America.

Sincerely,

A handwritten signature in cursive script that reads "Michelle DePass".

Michelle DePass
Assistant Administrator