



Summary of NGO Comments on the Kobe 3R Action Plan of the G8 by Basel Action Network Citizens Against Chemicals Pollution

Bali, June 26, 2008

Introduction

The Kobe 3R Action Plan of the G8 (Action Plan) is significant in the sense that it explains the importance of advancing national 3Rs policies and programs in each country and calls for the cooperation of the international community to tackle the worldwide waste problems. It is also worth noting that it points out the relation between the 3Rs and climate change.

The Action Plan, however, is evidently not an environmental initiative, but an economic initiative, founded on the global free market mechanisms, aiming to liberalize trade in remanufactured goods. The Action Plan excessively talks about improvement of resource productivity and enhancement of job markets in developing countries through the 3Rs-related activities and through the promotion of a sound international resource circulation.

The Action Plan completely ignores the current global waste situation – the environment and human health in developing countries are increasingly and disproportionately impacted by hazardous wastes exported from developed to developing countries under the name of recycling. Further, the Action Plan seriously fails to give appropriate consideration to critical steps needed to solve the problems caused by toxicity of certain products, materials, and wastes.

Concerns

Some of the key concerns over the Action Plan are as follows:

- G8 and other developed countries continue to fail in making a clear commitment to invest their resources in preventing hazardous waste from being exported to developing countries in order to ensure the rights for all human beings to live and work in a safe, healthy environment. Particularly, several G8 member countries such as Japan, Canada, Australia, and New Zealand have not ratified the total ban on export of hazardous waste from developed to developing countries for disposal and for recycling (the Basel Ban Amendment);
- Such terms as “materials” “waste” “re-usable and recyclable resources” and “remanufactured goods” are used without making a clear distinction between hazardous waste and non-hazardous materials, whereby the Action Plan promotes the production, market and trade of remanufactured goods, including hazardous wastes. Without this clear distinction a possible conflict with the Basel Convention obligations, decisions and principles can occur;

- The Action Plan fails to recognize and address the responsibility of developed countries to cut hazardous waste generation at source and to achieve national self-sufficiency in hazardous waste management, as required by the Basel Convention;
- No concrete targets and measures are proposed to implement the first R, Reduction, in developed countries, in spite of the goal to “give high priority to waste reduction” stated in the section *Goal 1*. The Action Plan dismisses the fact that the G8 has the greater role to play in waste reduction. For example, the Action Plan does not provide examples of how the G8 countries are planning to bring about a much-awaited change in production processes that utilize toxic inputs, the over-consumptive lifestyles of communities, particularly in developing nations;
- Potentially environmental polluting technologies such as energy recovery and thermal waste treatment or incineration are promoted in the Action Plan. Considering that waste incineration emits greenhouse gas, again the Action Plan fails to touch on the more critical approach needed to address the global waste crisis, such as reduction of waste at source and alternatives to incineration.
- The promotion of recycling industries without regard to social conditions in a given country under the term “Global Zero Waste Society” reduces the aim of sustainable development to a question of technology. Sustainable development is hinged on a sensitive balance among social, economic, and environmental rights. Disregarding one right over the other provides a wrong picture of what real sustainable development ought to be.

Recommendation to the G8:

The Kobe 3R Action Plan is strongly urged to recognize that worsening environmental pollution and health risks associated with the improper management of waste in developing countries are attributable to the increasing amount of toxic and other wastes exported from developed to developing countries. In this regard we, members of civil society call:

1. For the ***G8 member countries*** that have not ratified the Basel Ban Amendment to immediately ***ratify the Amendment***. The G8 countries have a great responsibility to institutionalize the principle of environmental justice by banning economically motivated hazardous waste dumping.
2. ***Institute genuine efforts at waste reduction***, for instance by establishing toxic waste generation caps among G8 member countries, to finally halt the decade's long increase in toxic waste generation.
3. ***Recognize and impose responsibility on manufacturers, consumers, and G8 waste exporting countries***. A 4th R – responsibility is needed, among manufacturers and producers for them to eliminate toxins from their products and production process; among consumers to look at their ecological footprint and change their consumption patterns; and among G8 governments to take a strong leadership role in tackling these issues by fulfilling their international law obligations and to stop efforts in undermining them.
4. ***Uphold the Basel Convention and its decisions***. The insidious use of trade agreements to push toxic trade only serves push the Basel Convention into the margins by undermining it through, among others, redefining wastes as goods, materials, and products; prohibiting countries from instituting trade bans; and obligating countries to protect all forms of investments including those that could very well bring toxic wastes and technologies.

- End -