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Recommendations for Updating the OECD Guidance Manual on EPR  
from Japanese Experts (Draft)

The following points shall be included in the updated guidance manual. These are based on insights of Japanese experts who have plenty of experiences on EPR policies in Asia as well as Japan.

1. To state clearly that in developing countries, all stakeholders and systems presumed in developed countries do not necessarily exist. Even they exist, their power or efficacy to a product system are insufficient and do not match those in developed countries. For instance,
  - Manufacturer,
  - Proper recycler,
  - Municipal solid waste management system, and
  - Business organization.
2. In such a country, an EPR policy needs to be developed one by one. The updated guidance manual shall explain the phases of EPR policy development that many developed countries did not experience. In the context of emerging economies/start-up phase of EPR application, the guidance may consider phase-in approach to adjust EPR application to the level of national economic development, capacity for environmental policy enforcement, and market structure for products and recyclables. EPR implementation should progressively go from a basic focus on improved waste management to finally achieving design for the environment.
3. To state clearly that an EPR policy cannot be designed appropriately by considering producers' roles and responsibility only. Producers have an influential power on product design but do not necessarily have largest power in every activity relating to a product system. Other stakeholders such as municipalities, retailers, and consumers, more or less, can contribute to a better, environmentally friendly product. Consumer responsibility and role includes, for instance, cooperation with an EPR system in source sorting and green purchasing respectively before and after the use of a product.
4. Information provision and informative producer responsibility plays a key role, in this sense.

5. Importance of stakeholders' engagement from policy design stage to ensure stakeholder's ownership in EPR scheme at implementation stage cannot be emphasized too much in this sense in the guidance manual. Stakeholder involvement takes time in some cases.
6. To state that aims of an EPR policy shall be clarified and shared with relevant stakeholders. Extending producer's responsibility is not an ultimate goal. An EPR policy for downstream improvement and that for upstream improvement are not identical. A country does not have any manufacturers nor enough market volume has to put importance on downstream improvement, leaving out upstream improvement (technology development of product design) to other countries.
7. Allocation of responsibilities does not always result in successful implementation of an EPR policy. Both allocation of responsibilities and giving incentives to stakeholders are designed into an EPR policy carefully so as to achieve a goal of concerned.
8. New market innovations that can weaken EPR systems occur outside an EPR policy. Market observation is necessary.
9. EPR policies can lead to many product-level innovations (DfE) and technology innovations (such as separation, recycling, and proper treatment), but not many to system-level innovations. EPR is one of guiding principles to achieve sustainable material management.
10. International producers should prefer common systems, such as a registration system of producers, in order to reduce their administrative burdens. The long-term perspective is to be considered by international society.

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