

Extended producer responsibility (EPR)

Issues and concerns

Extended producer responsibility (EPR) policies seek to improve the environmental and social performance of products by holding producers and brand owners accountable for the entire lifecycle of their products. According to [an academic definition](#), EPR is: a policy principle to promote total life cycle environmental improvements of product systems by extending the responsibilities of the manufacturer of the product to various parts of the entire life cycle of the product, and especially to the take-back, recycling and final disposal of the product.

While EPR refers to a number of economic and administrative policy instruments and upstream approaches, the most effective forms of EPR address the entire lifecycle impacts of plastic, and provide that all products on the market are reusable or recyclable. Such mechanisms are:

- Establishing strong and measurable requirements for producers to phase out single-use products and packaging, especially sachets;
- Redesigning non-reusable or recyclable products and putting systems in place for reuse;
- Avoiding use of toxic additives and multi-materials, and other barriers to safe and efficient recycling;
- Providing financial support for public alternative delivery systems; as an example, [eco-modulated fees](#) consisting of incentives and penalties for product and packaging design can serve as an effective policy tool for plastic reduction.

Despite success cases witnessed in applying EPR to discarded batteries or medicine, the actual potential of EPR policies have yet to be proven when it comes to plastic waste management. Particularly, [EPR has a troubling track record for materials that already had a recycling system in place such as printing, paper, and packaging materials](#), in which fast-moving consumer goods companies exclusively operated an EPR program through stewardship agencies under their control. Corporate control of EPR programs restrain community members from engaging in relevant decision-making processes, and outcompete local recycling systems, particularly impacting informal workers. Therefore, it is critical to design EPR programs based on existing municipal waste management systems, recognize the preexistence of waste pickers in places where they work, and establish structures for public oversight in order to ensure accountability and transparency.

Considerations for social justice should be a crucial element of EPR policies and programs; health, safety, and proper representation of workers in both formal and informal waste sectors contribute greatly to the effectiveness, accountability, and inclusiveness of the EPR program.

Recommendations

The global plastics treaty must embed well-designed EPR policies in it, guiding producers to:

- **Prioritize upstream solutions;** phase out single-use materials and redesign products and packaging for reduction and reuse.
- **Assume financial responsibility for all costs associated with material recovery,** including collection, transport and processing costs, public communication and education, independent auditing and oversight, and administrative costs.
- **Ensure public oversight on compliance, enforcement, transparent reporting,** as well as governance structures developed through a public decision-making process.
- **Build on existing municipal waste management systems.** EPR is not a one-size-fits all system, therefore it is key to ensure local players engagement in designing the best format for their context, particularly those who have been engaged in plastic recycling, such as waste pickers and community-recycling organizations.
- **Include waste pickers in the design and implementation of the policies.** Recognize the historical and current role played by waste pickers by including them as co-designer of the policies, prioritizing their inclusion and setting enforceable mandates and targets for integration.
- **Ensure open and participatory planning and implementation processes** for public input and fair representation of local organizations and small-scale businesses.

Pitfalls to avoid

- Misusing EPR to justify continued production of single-use plastic
- Focusing only on downstream measures
- Incentivizing false solutions (e.g. cement kilns, incinerators, plastic bricks, roads, etc.)
- Corporate-dominated EPR programs that could take over local recycling systems, halt public input, and reduce transparency
- Setting high barrier entry points to waste pickers or creating parallel systems

Further reading

- Break Free From Plastic. 2018. "Real Corporate Courage and Leadership is Needed to Reverse the Plastic Pollution Crisis". <https://www.breakfreefromplastic.org/wp-content/uploads/2018/10/Final-BFFP-Manifesto.pdf>
- Global Alliance of Waste Pickers. 2021. "The Global Alliance of Waste Pickers Position on EPR." <https://epr.globalrec.org/position-on-epr>
- Sanz, Víctor Mitjans, Elena Diez Rica, Eva Fernández, Palacios Adrià, Medina Alsina, Noelia Vázquez, Mouriz. 2015. Redesigning Producer Responsibility: A new EPR is needed for a circular economy. Zero Waste Europe. <https://zerowasteurope.eu/library/redesigning-producer-responsibility-a-new-epr-is-needed-for-a-circular-economy>
- Environmental Law Alliance Worldwide. "Plastic Law". <https://www.elaw.org/plastic>