



for a toxics-free future

**Intervention on Agenda item 3.b.i.g:
Consideration of whether to update the technical guidelines for the
environmentally sound management of waste lead-acid batteries**

By International Pollutants Elimination Network (IPEN), AGENDA for Environment and Responsible Development, Centre de Recherche et d'Éducation pour le Développement (CREPD), Centre for Environment Justice and Development (CEJAD), and Toxics Link

We would like to note that the Basel Convention's current *Technical Guidelines for the Environmentally Sound Management of Waste Lead-Acid Batteries* were adopted in 2002 and published in 2003. Since that time, concerns about human health and environmental consequences related to the unsound management of used lead-acid batteries (ULABs) has been growing, especially under conditions that prevail in many low- and middle-income countries. Relevant information has also been evolving, including the medical understanding of the human health effects of lead exposure.

For these and other reasons, it would be appropriate for the OEWG to decide to formally review its existing *Technical Guidelines*, and to update them, as appropriate.

Background

1. UNEA 3 (in 2017) adopted decision (3/9) that invited the Basel Convention COP to consider revising the Technical Guidelines for the Environmentally Sound Management of Waste Lead-acid Batteries. The decision additionally encouraged member States to implement the environmentally sound management of waste lead-acid batteries, and it referenced the need for capacity building aimed at establishing national regulatory frameworks and programmes to address the recycling of waste lead acid batteries and to better track and trace their shipments.

2. The Basel Convention COP 14 (in 2019) responded to this invitation by requesting the OEWG, during its 2020-2021 biennium, give consideration to whether these technical guidelines need to be updated.

3. Growing international attention is being given to concerns about significant and pervasive lead poisoning that result from unsound ULAB recycling, especially under the conditions that prevail in many low- and middle-income countries. This includes occupational lead exposure, and it also includes lead poisoning in both children and adults living near ULAB recycling operations.

A recent World Health Organization Document¹ begins from the premise that ULAB recycling is an important public health concern because the ULAB recycling industry is

¹ *Recycling used lead-acid batteries: health considerations*, ISBN 978-92-4-151285-5, © World Health Organization, 2017 <https://www.who.int/ipcs/publications/ulab/en/>

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associated with high levels of occupational exposure and environmental lead emissions. The document states: “*there is no known safe level of exposure to lead, and the health impacts of lead exposure are significant.*”

4. The current Basel Technical Guidelines give a possibly different evaluation of the health effects of lead exposure. The Guidelines state that the normal range of blood lead levels in adults is between 10µg/dl and 40µg/dl. They additionally state that evidence of harmful effects in adults is rarely seen at blood concentrations below 80µg/dl. The *Guidelines* also appear to reflect out-of-date medical opinion about the effects of lead exposure in children, stating: “As yet, there is no unequivocal evidence showing whether continued low level but excessive lead intake has any effect on the mental state of the child.”

The sections of the *Guidelines* relating to health effects would benefit from a review and a possible update by medical experts to reflect newer findings that exposure to lead significantly harms human health at lower levels of exposure than was previously thought.

5. Total volumes of ULAB wastes and ULAB recycling have been rising rapidly in low- and middle-income countries. And the current international attention now being given to concerns about unsound ULAB recycling relate mainly to the conditions that prevail in many of these countries. The *Guidelines*, however, do not appear to give much attention to conditions and specific problems that commonly arise in countries with developing economies. An updated version of the *Guidelines* might give greater attention to this.

6. The UNEA 3 decision that invited the Basel Convention COP to consider revising the Technical Guidelines includes a reference to the importance of establishing national “*regulatory frameworks and programmes*” to address the recycling of waste lead acid batteries and to better track and trace their shipments. The current *Guidelines*, however, make only passing reference to regulatory frameworks, a topic area that is explicitly addressed in some other Basel Technical Guidelines (for example, the Basel Convention *Technical Guidelines on Mercury Wastes* contains a section on *Legislative and Regulatory Frameworks* and another section on *Awareness and Participation*).

7. Some ULAB recycling practices – especially practices in low- and middle-income countries – have evolved since the time the current *Guidelines* were prepared and adopted. A review and possible update may better align the *Guidelines* with current practices and current needs.

IPEN

Box 7256, 402 35 Gothenburg, Sweden | Phone: +46 31 799 5900 | email: ipen@ipen.org; SaraBrosche@ipen.org

www.ipen.org