



Comments

Managing Telecom e-Waste **Q19/20 of the TRAI consultation paper on Green Telecom**

1. There have been commendable, CSR oriented initiatives by leading telecom/handset manufacturers on the collection of disposed, old handsets in the country. Specific reference is made to Nokia in their green planet initiative.
2. However, the actual ownership for green technology initiatives/disposal is far from ingrained in the system and this thought paper submits that initiative will have to be taken to address:
 - a. Design
 - i. By building and using ROHS compliant EEE products for use in the program
 - ii. By using energy systems that are meeting compliance norms defined by BEE regulatory and harmonised with the best world wide practises
 - iii. Handset mobile chargers to be standardised on a common interface and to a 5 star rating Energy Star/proposed BEE rating
 - iv. SAR standard compliant handsets
 - b. Usage
 - i. By leveraging energy efficient practises in executing the telecom services
 - c. Disposal
 - i. Move beyond individual producer responsibility (IPR) initiatives (example NOKIA) to a collective producer responsibility model
 - ii. Each of the participating vendor to pay an advance recycling fee and the system to define a contention free process for addressing orphans.



- iii. Full collection grid, collection marketing program, people deployment and information system for compliance to be created under a separate PRO (MAIT implementation guidelines for India WEEE legislations will set the stage).