

by Jim Puckett

Recycling: no excuse for global environmental injustice

Shocking revelations by the Basel Action Network (BAN) brought the world's attention to the environmental injustice of shipping hazardous electronic waste from North America to developing countries for processing under horrendous conditions. Jim Puckett draws on his experiences with BAN to discuss the principles of environmental justice embodied in the Basel Convention and the issues associated with exporting hazardous waste to developing countries for recycling.



Last year, the Basel Action Network (BAN), together with the Silicon Valley Toxics Coalition (SVTC), published the report *Exporting Harm: The High-Tech Trashing of Asia*. The report startled the world and stunned a complacent industry when it revealed for the first time that about 80% of the electronic wastes collected in North America for 'recycling' actually find their way, via container ships, to dangerous extraction and dumping operations in Asia.

Through the report and a subsequent film of the same name, the world was presented with a nightmarish vision of where a lifestyle of excessive consumption and unregulated industry can lead us. We were taken to the places where our favourite high-tech equipment goes to die and saw for the first time the Chinese, Indian and Pakistani labourers earning US\$1.50 per day that serve as its undertakers. We saw a new and ugly underbelly of the cyber-age revolution, as its marvels lay juxtaposed in the horrific matrix of global inequity. We saw the toxic effluent of the affluent broken down with medieval technologies and little regard to the real but, as yet, uncalculated

environmental and occupational costs. This unwrapping of the high-tech and recycling industries' 'dirty little secret' was met with shock and dismay from manufacturers, consumers, recyclers and regulators alike.

Similarly, a few years earlier, the *Baltimore Sun* (1997), the *Atlantic Monthly* (2000), the BBC, the International Labour Organization, Greenpeace and others had brought the horrors of the global ship recycling industry to the eyes of a disbelieving public. This industry had, by the 1990s, all but completely migrated from rich, industrialized countries to countries such as Bangladesh, India, China and Pakistan where labour is worth less per pound than the scrap steel that is cut away each day by hand with torches, saws and chisels, from rusting hulks full of asbestos, wiring impregnated with polychlorinated biphenyls (PCBs) and toxic paints. The images revealed an 'industry' that harnesses humans like mules and kills them as easily from asbestos exposure, accidental crushing and gas explosions.

It is estimated that 25% of the approximately 40,000 workers employed in but one Indian ship-breaking region are likely to contract cancer from asbestos exposure alone.

These exposés have, once and for all, established that simply leaning hard on the term 'recycling' will not guarantee environmentally benign outcomes. This is particularly true in developing countries and where



Ship-breaking in Alang, India, where the considerable hand removal of asbestos and open burning of wastes creates severe occupational and environmental hazards.

Copyright: Greenpeace



Inhabitants of this recyclers' village near Guiyu, China, make their living sorting wires by day and burning them on open fires by night. The wires come from electronic waste imported from North America, Europe and Japan. Open burning releases harmful emissions of dioxins, heavy metals and polycyclic aromatic hydrocarbons (PAHs). Copyright: BAN

hazardous wastes are concerned. While some people may be unhappy that recycling's good name has been sullied, it is healthy and prudent for the world to realize that recycling, like any industry, can be dangerous and polluting if those in charge are willing to export real environmental and health costs to unsuspecting environments and populations.

A recycling horror show ignored?

Although governments and manufacturers have been shaken by these revelations, they have not yet awoken fully to the need to close the curtains on this ugly form of international trade. It is a perverse form of commerce that victimizes the poorest communities while providing a counter-productive subsidy that allows manufacturers to care less about the end-of-life impact of their products. As we shall see, with manufacturers and industry dragging their feet, it may be up to leaders in the recycling industry to heed the wakeup call and begin to demand far more than 'business as usual'.

Perhaps the most alarming trend is that the same electronics manufacturing and shipping industries, together with most governments, who have never bothered to follow and assess their products' end-of-life voyage to Asia, are now engaged in yet another phase of head-in-sand denial. The conclusions they have drawn from the recycling nightmare in Asia is that as long as we set up more technologically advanced facilities in developing countries, then the identified problems will be magically washed away and a free trade in hazardous waste can and should continue.

This 'business as usual' justification is increasingly being trotted out, costumed in greenish terminology such as 'environmentally sound management', 'due diligence' or 'through certification regimes'. Indeed, many have gone so far as to offer various technologies for dealing with toxic

wastes, together with the wastes, in an export 'package deal' cloaked as 'capacity building'. These new catch phrases – like the word 'recycling' – can belie inherently unjust and environmentally unsound exploitation of weaker economies.

The Basel Convention: a landmark for environmental justice

Before the world veers wildly away from its better judgement as embodied in the purpose and obligations set out in the United Nations' Basel Convention and plunges further down a discredited course toward toxic colonialism, it is worth delving deeper into the ramifications of toxic waste trade for recycling. We need to explore why efforts to utilize weaker economies to handle environmental problems will always be unjust and at cross-purposes with true environmental and economic sustainability.

The first international toxic waste trade scandals that took place in the late 1980s and early 1990s spawned the *Basel Convention on the Control of the Transboundary Movements of Hazardous Wastes and their Disposal*. Soon after this, waste traders began to use the environmentally friendly word 'recycling' to justify the export of hazardous wastes from rich to poorer countries. Virtually all the hazardous waste trade proposed today (be it industrial or post-consumer waste) is exported for 'recycling'. Closer scrutiny of the export schemes and flows reveals that, due to their sham or dirty processes, the recycling operations may in fact be little more than dumping by another name.

It was for this reason, which was already apparent in the early 1990s, that the Basel Convention decided in 1994 to ban *all* exports of hazardous wastes for final disposal *and* for recycling from developed to developing countries. This consensus decision has been hailed as a landmark for international environmental justice.

In 1995, the Parties to the Basel Convention elevated the ban decision to a proposed amendment of the Convention, which is now in the process of gathering the necessary 62 ratifications before it can become new text in the treaty. It is important to note that all 15 Member States of the European Union (EU) have already implemented the ban in their legislation.

Hazardous waste recycling: a polluting enterprise anywhere

The Parties to the Convention specifically included recycling destinations in the total ban because export of hazardous waste for recycling from developed to developing countries involves significant transferred risk and contradicts the fundamental purposes and obligations of the Convention. These obligations include the call for all countries to try to achieve national self-sufficiency in hazardous waste management to an extent that makes it possible to minimize the generation of hazardous wastes at the source.

What the Parties realized (but which is still not recognized nearly enough) is that, unlike the recycling of non-hazardous wastes such as paper, rags and scrap non-toxic metals, *hazardous* waste recycling is inevitably a

polluting enterprise even in the best of circumstances. While most of these residues may be captured via costly and maintenance-intensive end-of-pipe engineering, they in turn must then be disposed of as hazardous wastes.

Hazardous waste recycling has proved to be an expensive environmental nightmare, even in rich developed countries. For example, 11% of US Superfund priority contaminated sites designated for mandated clean-up were caused by recycling operations. And it is a problem that continues to develop. For example, existing secondary metals smelters in North America are some of the most notorious and significant point-source polluters of both heavy metals and persistent organic pollutants. It is largely due to the expense and difficulty of operating such facilities cleanly that no new smelters are planned in that continent and the secondary smelting industry is instead migrating to developing countries.

'Even in state-of-the-art facilities, hazardous waste recycling involves exposing workers to danger and/or produces toxic residues or emissions'

Furthermore, many toxic problems created by recycling operations continue to be ignored by regulators. Among these concerns are the highly toxic dioxins, furans, beryllium and mercury created and/or released by

secondary metal smelters, cutting torches and open burning. Similarly, secondary plastics melting operations are likely to create harmful hydrocarbon emissions or possibly mobilize additives in plastics such as heavy metals, phthalates, isocyanates and brominated flame retardants.

A 'techno fix' is no cure for toxic trade

Even in rich, industrialized countries where the level of technology is high and the infrastructure and resources exist to monitor and maintain these high standards, it is still not possible to prevent pollution and toxic residues from hazardous waste recycling. How then, can we justify the export of the same wastes to developing countries, where the possibility of mitigating the impacts is far less likely?

Indeed, hazardous waste recycling in developing countries is a much more dangerous prospect. But because the technologies witnessed in their computer scrapping villages and the ship-breaking beaches are clearly substandard, and this leads some to the false conclusion that the issues concerning toxic trade with developing nations are strictly technical in nature.

It is vital to realize, however, that the dangers of utilizing weaker economies stem from far more than mere questions of adequate technical capacity, but involve a whole spectrum of factors that we in developed countries might take for granted. Social, financial and infrastructure factors are at least as important as technical criteria in protecting people and environment. These factors include adequate legislation and resources, and the labour and political will to

enforce such legislation, including monitoring and inspecting operations.

Infrastructure is necessary to provide emergency response, adequate roads and services to ensure safe transport and adequate medical facilities to monitor and protect worker and community health. It involves the public and workforce having sufficient democratic capability to be aware of the risks they face and then to redress environmental and occupational concerns and to be able, if necessary, to protest against hazardous working or living conditions without fear of retribution. It involves the capability to legally seek justice and compensation when health and environment is impaired. It is extremely naive to expect most of these factors to exist in the developing world – even when the will exists, the requisite resources do not. Thus it is a fact of life in our world of uneven playing fields, that cheap (as in labour) is in fact dirty (as in polluting) where toxic waste is concerned.

The 'environmentally sound management (ESM)' technofix might at first sound good. But if taken to its logical conclusion, there is a strong likelihood that, if we let them, virtually all polluting industries – especially those that are labour-intensive such as manual recycling – it will be driven by market forces toward developing countries. This is due to the fact that wages are about a tenth cheaper in developing countries and environmental, human health and individual protection is, for various reasons, many magnitudes less.

There is no such thing as 100% recycling and, even with state-of-the-art technologies, the wastes in question are

hazardous. Thus, the inevitable contamination, risks and residues will be transferred, with developing countries becoming rife with toxic waste landfills, hazardous waste incinerators and hazardous waste treatment facilities, and their accompanying occupational disease and degraded environments. All this pollution and harm would, in effect, be traded from rich to poor in clear violation of the principle of environmental justice that states that no peoples should be disproportionately burdened with environmental harm simply because of their economic, racial or other status.

In this scenario, which is already beginning to play out, the ESM 'just-give-them-technology' solution serves as a convenient excuse for the rich developed countries to effectively wash their hands while wringing out industrial dirt on the poor. It means that the poorest regions of the world, by virtue of brute economics alone, would become the toxic waste colonies of the rest. Is this the kind of world that recyclers want to create? One should hope not but this is what we are hearing already in response to scandalous exposure to dirty offshore recycling.

The toxic trade apologists

In the case of electronic waste (e-waste), we have begun to hear it argued that strict export controls and a policy of national self-sufficiency in hazardous waste management (as called for by the global community in the Basel Convention) are not necessary. It would be better just to give the Chinese the proper technology then we can

continue exporting the pollution en masse. The US Government, for example, currently claims that export is part of its waste management strategy for the US tidal wave of electronic waste. The US Environmental Protection Agency's electronic waste expert, Robert Tonetti, claims that what is really needed is a minimum global standard of technological criteria. Likewise, the International Association of Electronic Recyclers refuses to take a stand in support of a ban on the export of hazardous electronic wastes to developing countries. Waste Management Incorporated, the world's largest waste management conglomerate, which is muscling into the lucrative e-waste management business with subsidiaries such as Recycle America Alliance, refuses to halt its waste exports to developing countries while trying to present the greenest of public images.



Child of electronic waste labourer from Hunan province perched on pile of non-recyclable, imported waste dumped on the side of the road in Guiyu. Much of this imported e-waste is dumped along roadways and rivers, or burned openly. Photo: BAN

We have seen a similar response from the US and Dutch governments, the International Maritime Organization (IMO) and the global shipping industry with respect to the ship-breaking nightmare on Asian shores. Just give the Indians or the Chinese some technical assistance and investment, runs the argument, and we can go ahead and export all of the toxic ships that we want. The US Maritime Administration (MARAD) has re-opened the closed book on exporting its asbestos and PCB-laden obsolete US naval vessels and is actively exploring the feasibility of using Chinese ship-breaking yards for the disposal of these 'toxic' ships. MARAD's Shaun Ireland stated at a recent conference that the US may need to provide some technical assistance to get the Chinese yards to an appropriate standard in order to begin the exports. At the bequest of the shipping industry, the IMO is frantically trying to draft a guideline that will contradict the Basel Convention's call for decontamination of ships prior to export. Their aim is to carry on 'business as usual' before the Basel Convention can explore thoroughly the legal implications of the toxic trade in obsolete ships. The Dutch Government is doing everything it can to help its huge shipping interest, P & O Nedlloyd, to pursue ship-breaking ventures in China – presumably justified by 'technological capacity building'.

Not only is such toxic trade an affront to environmental justice as it victimizes the poor with toxic, unsustainable jobs, the export 'solution' works in contradiction to the 'polluter pays principle' or the principle of 'waste prevention'. It allows very real environmental costs to be externalized by those responsible for creating them – the electronics and shipping industries in our two examples. In effect, whenever a government allows externalization of costs (in this case via export), it creates an unfair subsidy for industry to continue to create

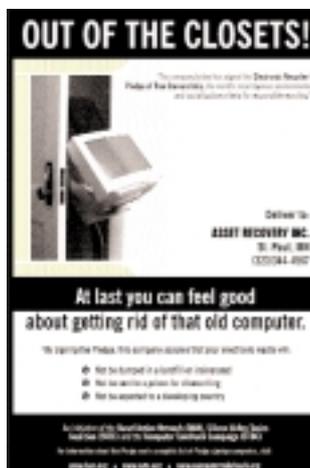
polluting products and wastes. This pollution subsidy then stifles the innovation desperately needed worldwide to implement preventative solutions upstream through green design that avoids pollution in the first instance.

Enough of this distorted economic system that subsidizes pollution and not solutions – free trade is for 'goods' not hazardous waste!

Dumping disguised as charity

It is often argued that toxic trade is beneficial to recipient countries. We have heard claims that hazardous waste exports for recycling are justified by the reported need of developing countries to obtain cheap sources of certain raw materials, such as lead, which might be obtained from imported hazardous waste sources such as lead-acid car batteries, or steel from the breaking of ships laden with asbestos. It is thus vital to bear in mind all the reasons why such sources are cheaper than obtaining already processed lead or steel.

Besides the labour costs, dirty scrap recycling is less expensive in developing countries because of the expensive operations required in developed countries to control pollution and risk at great expense. The cost differential is largely a factor of externalizing environmental and health costs to developing countries, where such requirements are not as rigorous. Furthermore, such mass importation of cheap and toxic sources of lead or steel from rich and wasteful developed countries often leads to disincentives to perpetuate serious collection and recycling of domestic materials such as lead from batteries in the importing country.



Advertising campaign promoting the Electronic Recycler's Pledge of True Stewardship. Copyright: BAN

In fact, despite the short-term economic gains that can be made from importing toxic wastes rather than pre-processed material streams, developing countries have repeatedly rejected this option in favour of long-term economic and ecological sustainability. In every instance in the Basel Convention when developing countries had the opportunity to 'vote' against waste trade, they have done so decisively. Even in the instance of ships for scrap, developing countries already heavily engaged in the ship-breaking trade were the vital voice that called for the decontamination of ships prior to export in the Basel Convention Guidelines on Ship Dismantling. In fact, many developing countries have enacted their own import bans (such as China's ban on electronic waste imports). It is clear that, while developing countries want raw materials, they are not happy to accept toxic waste as part of the bargain.

Another corollary to the 'waste as welfare' argument is the belief by some that banning exports of toxic waste takes food out of the mouths of poor Asians who would otherwise be without life-sustaining jobs. This view once again begs the question of whether or not there are other, far more sustainable, ethical and economically viable choices than the choice between poverty and poison. Most emphatically, there are! Even if we were to look at the issue from a strictly economic viewpoint, it is extremely unlikely that a waste importing country or population will reap a net economic benefit when all costs are internalized and truly accounted for. Such costs include the costs of remediation of environmental damage, proper healthcare and loss of productivity for those affected by occupational disease stemming from the waste processing. On the contrary, the costs of mitigating toxic contamination (once incurred) are astronomical.

But the sheer profundity of the ethical questions involved makes the economist's view – however valid – appear callous. First, we must ask: is it ever right to trade economic development for impairment of environmental and human health? The logical extension of this painfully cynical view, which values the lives of the poor as being worth less than those of the rich, is that we would hire the poor to scrub out the inside of nuclear reactor chambers, or perhaps to disarm landmines or serve as guinea pigs for medical experimentation. If we are indeed concerned with the welfare of the world's poorest people, we would not expect them to swim upstream through our toxic waste to earn the right to join the elite, developed group of nations. Instead, we would promote clean, sustainable job programmes rather than trying to disguise our dumping as some form of charity.

Export as good for the environment?

Besides arguments that claim that toxic waste is good for developing countries, we have heard arguments that attempt to make the case for toxic trade as good for the global environment. Export for recycling has been justified by comparing it head-to-head with the environmental damage from mining. However, the notion that the worst recycling is better than the best mining practices, even if true, begs the logic of comparing one environmental evil to

another, with an assumption that our choices are limited to two bad options. First, there is the alternate choice of not exporting the material to the cheapest location for recycling but managing the waste in the country where it is generated and can serve as an 'in-house' incentive to prevent its environmental impact. Secondly, it is important to realize that ultimately, in order to avoid destructive mining and recycling, we as a society need to first minimize and phase out our use of all toxic minerals and metals such as asbestos, cadmium, lead and mercury. The assumption that we should, and will continue to extract and use toxic substances, and to introduce and re-introduce them into the biosphere, is a misguided and dangerous one. When one recycles a hazard, one is left with a hazard – and are we not all trying to eliminate hazards? Let's move to substitute toxic materials with non-toxic alternatives and, for those minerals and metals that are non-hazardous, we must design easily recyclable products. For these, recycling is certainly preferable to mining or primary extraction.

'When one recycles a hazard, one is left with a hazard – and are we not all trying to eliminate hazards?'

Finally, with respect to electronic waste we have sometimes heard arguments that, because electronics are increasingly manufactured in Asia, then exporting these post-consumer waste materials back to Asia makes some kind of sense – as in closing the materials loop. We have even heard justifications of waste export to Asia as a twist on the 'takeback' producer responsibility argument. This argument is seemingly compelling to those wishing to justify waste exports at all costs, but the professed logic falls apart quickly when viewed from the perspective of environmental justice. The fact that cheap labour is exploited by a transnational electronics manufacturer to produce a product cannot justify exploitation of that same low-wage labour population for its end-of-life disposal, particularly if that exploitation involves hazardous substances. It is callous and cruel to expect the peoples of developing countries to bear the burden of the two most polluting segments of a product's life cycle – particularly when the benefits of most high-tech products are enjoyed in rich developed countries during the more benign phase of its life-cycle use. To achieve the built-in incentives of product stewardship's cost internalizations that work to stimulate greener design and, at the same time, to minimize trade in hazardous waste, 'takeback' should occur in the country of consumption – and where the product becomes a waste.

Recyclers join environmentalists to close cheap and dirty waste options

And now the good news. Some promising developments are starting to promise a patch of blue sky amid the gloom. A growing number of recyclers and waste management officials at the local level are beginning to take a stand

against these economically distorting cost externalizations, which are robbing legitimate recyclers of their shares in the recycling market, and preventing the proper build-up of infrastructure in developed countries to manage their own hazardous wastes safely.

Most exciting was the action taken by an alliance of US and Canadian electronics recyclers early this year. In a series of six simultaneous press conferences, the recyclers made the surprising announcement that they were going to voluntarily uphold social and environmental waste management criteria developed by BAN, SVTC and the Computer TakeBack Campaign (CTBC). The recyclers pledged to impose a standard of diligence on themselves far in excess of legal mandates, and would accept the likely increase in business costs compared with their competitors. The *Electronic Recycler's Pledge of True Stewardship* assures consumers that their old computer will not be dumped in landfills, exported offshore or be processed using prison labour.

This move was based on a conviction by environmentalists and recyclers alike, that, despite the refusal of government and industry to deal proactively with the burgeoning electronic waste crisis, a market does exist and is driven by customers who want to do the 'right' thing rather than simply the cheapest thing.

The *Electronic Recycler's Pledge of True Stewardship* was crafted by BAN and SVTC after many months of consultation with electronic waste recyclers. It calls for, among other things, a full closure of the cheap and dirty outlets for electronic wastes that are the today's commonest destinations – export, landfills and prisons. So far the pledge has only 18 signatories, but the intention was not to reward the status quo, but to find an elite group of concerned businesses willing to change it. By first distinguishing the industry leaders from the laggards and then by directing those consumers (including institutions, government agencies and original equipment manufacturers) who are willing to pay a little more to do the right thing to our 'E-Stewards' we can, using market forces in lieu of adequate legislation, work to create a growing market for responsible recycling. For a full text of the pledge and a list of the companies that have signed up to it, visit www.ban.org or www.svtc.org.

Similarly, domestic ship-scrapping interests are increasingly siding with environmentalists in their call to prevent the cheap and dirty option of exporting toxic ships to the Asian beaches. Recently, informal alliances between BAN, Greenpeace, ship dismantlers and trade unionists in the US and Europe have started to blossom to counter the brute economics that MARAD seems set on exploiting as they prepare their ships for export to countries such as China.

Conflict of interest: true recyclers and waste brokers

The alliances now being forged between recyclers and environmentalists are especially exciting to those of us who have worked for many years against toxic trade. In the past we have been strangely at odds with recycling associations

that, while claiming to represent recyclers, also fought to keep the doors to toxic waste exports open.

However, we now realize that many of these so-called recyclers could more accurately be described, based on what they actually do, as global waste brokers or distributors rather than actual waste processors. Such companies make their primary living finding the world's most profitable destinations for wastes rather than actually recycling it, and thus it is not surprising that they would oppose toxic trade.

Unfortunately, too many of the aforementioned 'waste distributors' enjoying (and exploiting) the positive greening effect of the word 'recycling' have joined the ranks of national and international recycler associations and now represent a significant part of their membership. These waste trading interests have found undue representation within organizations such as the Bureau of International Recycling (BIR), The Institute of Scrap Recycling Industries (ISRI) the United States and International Chambers of Commerce and the International Alliance of Electronics Recyclers (IAER). As a result, these organizations have unwisely frittered their members' money lobbying for deregulation, particularly with regards to the definition of wastes to be regulated and restrictions on the uncontrolled transfer of waste from rich to weaker economies as is now being sought by the Basel Convention and the EU Waste Shipment Regulation.

The mistake made in this regard derives from the fact that true recyclers, which these organizations should be solely representing, have always gained far more profit from regulation than they are ever apt to lose. This is because waste management, without government intervention to force cost internalizations, more often than not is likely to prove unprofitable as a resource extraction business alone. That is, many waste streams are not inherently valuable enough to extract profit unless the very valuable service of preventing pollution, as can only be secured through regulation, is factored into the equation.

If anyone doubts this, just imagine how much money

Press conference held in the warehouse of Seattle-based, RE-PC, to announce the launch of the Electronic Recycler's Pledge of True Stewardship. Copyright: BAN



recyclers and waste managers would make if it were still legal to burn wastes openly or throw them into the forest, fields, rivers and oceans. It is only those so-called recyclers that seek to exploit the world's last remaining cost-externalizing dumping grounds – the avenues leading to developing countries, local solid waste landfills, prison labour, etc. – that stand to lose from regulation.

For example, many legitimate and responsible recyclers that have invested in expensive technologies operate close to the margins and are thus in desperate need of high volumes of waste in order to survive. They are losing significant profits due to the flood of waste that moves inexorably offshore to disastrous recycling operations, or else utilizes taxpayer-subsidized prison labour or municipal landfills.

Unlike Europe where regulation is now in place to forbid the dumping of electronic waste into landfills (the WEEE Directive) and where there is a ban – albeit badly enforced – on the export of such wastes to developing countries (the Waste Shipment Regulation), North America is currently experiencing waste management anarchy. For example, in both Canada and in the US it is legal in most instances to simply dump hazardous electronic wastes directly into MSW landfills. And, for different reasons, both countries refuse to control the export of hazardous electronic wastes or – with few exceptions – hazardous ships.

Because of this 'anything goes' policy, true recyclers suffer. United Recycling Industries in Chicago is one such company and, for this reason, has been vocal in pressing the US Environmental Protection Agency (EPA) to ratify the Basel Convention and the Basel Ban Amendment to make export illegal or at least severely restricted. According to its Vice-President, Ms Lauren Roman, the company has invested

millions in expensive, state-of-the-art electronics recycling equipment only to find its market disappearing via export, prisons and landfilling. 'Proper recycling must be considered an essential service to society to help prevent the contamination of our environment', says Roman. 'As such, regulation promoting true, clean, recycling instead of dumping options is appropriate, just as regulation promoting clean air and water is appropriate. Recyclers that oppose enactment and enforcement of regulations that are designed to better the environment only shoot themselves in the foot.'

In North America, it was this lack of governmental responsibility and legislation that made true recyclers seek to differentiate themselves from those using the low road by signing up to the Pledge of True Stewardship. Under the banner of 'No Export, No Dumping, No Prisons', the growing list of pledging companies have drawn a clear line between the true recyclers and the global waste distributors – between the 'doers' and the 'dumpers'.

It is time for more and more bold recyclers to so distinguish themselves, as it is clear that the export of toxic wastes to poorer economies for recycling is an unacceptable transfer of pollution to those least able to afford it. It can only be justified by brute, short-sighted economics and not from a moral, environmental, or even a long-term economic standpoint. Such trade leaves desperate workers in developing countries with a choice between poverty and poison – a choice nobody should have to make. By allowing this all-too-convenient escape valve for cost externalizations that should appropriately be internalized by rich consumptive societies and by manufacturers, innovation to solve our toxic waste problems through upstream 'green' design and cleaner production is stifled. Such 'dumping' taking place under the name of 'recycling' not only hurts true recyclers, but hurts all of us.

We must all do our part to re-affirm the principle of environmental justice and the Basel Convention's global obligations to achieve national self-sufficiency in waste management through waste prevention and minimization. Once and for all, it is time for environmentalists, governments and the private sector to unite in a resolve to pull the plug on the horror show that is the toxic waste trade, rather than finding yet more excuses for perpetuating it.

■ **JIM PUCKETT** is Co-ordinator of the Basel Action Network (BAN) in Washington, DC, USA.
Fax: +1 206 652 5750
e-mail: jpuckett@ban.org
web: www.ban.org

Notes

The Basel Action Network (BAN) is a global watchdog organization made up of many member groups from around the world. It seeks to promote sustainable waste management practices and global environmental justice. For more information about BAN and its work, visit: www.ban.org.

Immigrant child from Hunan province eating an apple sitting on top of an ash pile created by the open burning of wires from imported computers and electronic waste near Guiyu, China. This ash is expected to be contaminated by dioxins, furans, heavy metals and PAHs. Photo: BAN

