

MINISTRY OF ECONOMIC GROWTH AND JOB CREATION

**SECOND PRIVATE SECTOR CONSULTATION
ON
THE NATIONAL POLICY
FOR ENVIRONMENTALLY SOUND MANAGEMENT
OF HAZARDOUS WASTES
(GREEN PAPER)**

April 4, 2019

Ministry of Economic Growth and Job Creation (Conference Room)

Rapporteur's Report
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ACRONYMS

EHU	Environmental Health Unit
ESM	Environmentally Sound Management
JCA	Jamaica Customs Agency
MEGJC	Ministry of Economic Growth and Job Creation
MICAF	Ministry of Industry, Commerce, Agriculture and Fisheries
MOH	Ministry of Health
MSET	Ministry of Science, Energy and Technology
MTM	Ministry of Transport and Mining
NEPA	National Environment and Planning Agency
NRCA	Natural Resources Conservation Authority
NSWMA	National Solid Waste Management Authority
ODPEM	Office of Disaster Preparedness and Emergency Management
ODS	Ozone Depleting Substances
PCA	Pesticides Control Authority
SAICM	Strategic Approach to International Chemicals Management
SRD	Standards and Regulations Division

BACKGROUND NOTE

The second consultation with the public sector on the National Policy for Environmentally Sound Management of Hazardous Wastes (Green Paper) was held on 4 April 2019. It was the third in a series of consultations to ensure that all views are shared and accommodated in the Policy where relevant.

Hazardous wastes are dangerous to health and the environment and this Policy covers the Environmentally Sound Management (ESM) of this type of waste. It should be noted that the Policy adopts the definition of the Environmentally Sound Management (ESM) of Hazardous Wastes as defined under the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal which is, “taking all practicable steps to ensure that hazardous wastes and other wastes are managed in a manner which will protect human health and the environment against the adverse effects which may result from such wastes.” Following on this, hazardous waste is considered as any substance which by reason of its chemical activity, toxicity, explosivity, corrosivity or other characteristics, causes or is likely to cause, danger to health or the environment, whether of itself or on contact with other waste.

The Policy is in keeping with Jamaica’s National Development Plan-Vision 2030 Jamaica, in particular Goal 4: “Jamaica has a healthy natural environment”. Under this goal, Jamaica focuses on the effective management of the country’s natural resources to ensure the continued provision of essential environmental services. It also focuses on the design of environmental policies that internalize the cost of pollution and environmental damage into the production costs of all economic activities. It also acknowledges the fundamental right of Jamaicans in keeping with the Charter of Fundamental Rights and Freedoms (Constitutional Amendment) Act 2011, specifically Section 13 (3) (I) “the right to enjoy a healthy and productive environment free from the threat of injury or damage from environmental abuse and degradation of the ecological heritage”. In recognition of this right, the goal of this Policy is for the environmentally sound management of hazardous wastes in Jamaica in keeping with international and regional best practices, to ensure the protection of human health and the environment.

The strategic component of the Policy outlines actions to be undertaken and, where possible, the timeframe for their implementation by various stakeholders to ensure that the policy goal and objectives are realized.

The directives stated in the Policy are in accordance with Jamaica’s obligations under key multilateral environmental agreements and arrangements related to the management of chemicals and hazardous wastes including: the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal; the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade; the Stockholm Convention on Persistent Organic Pollutants (POPs); the Minamata Convention on Mercury; and the Strategic Approach to International Chemicals Management (SAICM).¹

The consultation was attended by key private sector stakeholders including: Total Jamaica limited, Campari Group, Initial Trading, Spirits Pool Association, EPAMS Jamaica, Environmental and Engineering Managers Limited, GB Energy Texaco, Future Energy Source Company Limited, National Rums of Jamaica

¹ Taken from the Executive Summary of the National Policy for Environmentally Sound Management of Hazardous Wastes.

Limited; and public sector partners – Ministry of Health (MOH), National Solid Waste Management Authority (NSWMA), National Environment Planning Agency (NEPA), and the National Commission on Science and Technology (MSET).

WELCOME

Ms. Joanne Felix, Director, Environment and Risk Management Branch, MEGJC

Ms. Joanne Felix welcomed the members of the private sector that attended the second private sector consultation on the National Policy for Environmentally Sound Management of Hazardous Wastes (Green Paper). Ms. Felix apologized on behalf of Ms. Gillian Guthrie, Senior Director, Environment and Risk Management Branch, Ministry of Economic Growth and Job Creation (MEGJC), who was unavoidably delayed.

POLICY OVERVIEW

Ms. Felix provided an overview of the Policy. She noted that the current Policy document, which had been submitted and reviewed by Cabinet, did not include medical waste. This was due to the fact that a separate document was being prepared to address medical waste by the Ministry of Health (MOH). However, the Cabinet requested that the documents be combined as a significant portion of medical waste was categorized as hazardous waste. She explained that the Policy document that had been distributed to participants did not include the section on medical waste but the presentation included minor changes that had been discussed in previous consultations including those related to medical waste.

National Instruments

Ms. Felix described the key national instruments that support the hazardous waste Policy – The Charter of Fundamental Rights and Freedom; the Vision 2030 (Jamaica’s National Development Plan) Goal 4 of which speaks to a healthy natural environment; and policies directly related to hazardous waste management including:

- Energy Policy (2009-2030)
- Revised Motor Vehicle Policy (2014)
- Medical Waste Management Policy (draft)
- National Policy on Environmental Management Systems (draft)
- Emissions Policy Framework (draft).

She reiterated that aspects of the Medical Waste Management Policy would be included in the current Policy being discussed.

International Instruments

In terms of regional and international instruments, Jamaica was a party to several – the most important being the Basel Convention which addressed the transportation of waste across national boundaries, particularly from developed to less developed countries; the Stockholm Convention addressed Persistent Organic Pollutants (POPs); the Minamata Convention on Mercury – ratified by Jamaica in 2017 – addressed the protection of the environment from emissions and uses of mercury; the Rotterdam Convention on Hazardous Chemicals and Pesticides in International Trade; and the Strategic Approach to International Chemicals Management (SAICM).

Ms. Felix noted that a small amendment had been made to the definition of hazardous wastes in the Ministry's presentation to encompass infectious medical waste – "Hazardous waste includes infectious medical waste and waste which exhibits the following characteristics – explosive, flammable, corrosive, toxic and eco-toxic." She pointed to the previous definition which appeared on page 9 of the Policy document.

She provided examples of hazardous wastes including: paints (with lead), pesticides and medical waste (including human tissue) among many others listed in table 1 on page 12 of the draft Policy.

The Policy goal was "the Environmentally Sound Management of hazardous waste in Jamaica in keeping with international and regional best practices to ensure protection of human health and the environment." Ms. Felix explained the definition of environmentally sound management as, "taking all practicable steps to ensure that hazardous wastes and other wastes are managed in a manner which will protect human health and the environment against the adverse effects which may result from such wastes." The definition had been adopted from the Basel Convention.

SWOT Analysis

Ms. Felix identified the strengths Jamaica exhibited in relation to hazardous waste management, such as, some key legislation already in place as well as the benefits provided by the international agreements to which the country was party in relation to access to well-researched best practices and financial assistance. Jamaica already had some treatment facilities. Weaknesses included the inability of the current decentralized framework to address hazardous waste and the absence of disposal sites to treat hazardous waste in an environmentally-sound manner. Opportunities include, public private partnerships and opportunities for waste energy research. Threats include, the amount of capacity building required and a lack of public awareness of the health implications of exposure to hazardous waste.

Hazardous Medical Waste

She highlighted some of the issues related to hazardous medical waste (infectious waste). According to the Ministry of Health, 20 per cent of the medical waste generated annually (1,600 tons) was categorized as infectious medical waste. This was waste generated during the various stages of health care and which contained pathogens which were capable of producing infectious diseases. Jamaica currently has the capability of treating 1,000 tons of waste. She reported that there was one steam generator located at the Kingston Public Hospital and four incinerators located across the island with limited functional

capacity. Some of the issues related to hazardous waste disposal were reported as inadequate labeling, and storage and handling at all stages of the life cycle. The lack of separation and labeling contributed to the inability to definitively quantify the volume of hazardous waste. She added that the carriers currently transporting medical waste were not specifically designed for that task.

Objectives and Strategies

Ms. Felix noted that some changes had been made to the objectives in the presentation. Objective 1 had been considered too broad so a strategy had been added under objective 1 and a new objective added, (Objective 4) with accompanying strategies.

The updated **objective 1** read – “to establish comprehensive legislative and infrastructural frameworks for the environmentally sound management of hazardous and other wastes.”

Strategy 1.A. To encourage the ESM of hazardous wastes through the strengthening of the regulatory frameworks.

Strategy 1.B. To facilitate the treatment and disposal of hazardous wastes in an ESM through the upgrade and institution of infrastructural works.

Strategy 1.C. To increase compliance and enforcement measures to ensure conformity with applicable legal requirements.

Objective 2. To improve information sharing, education and awareness raising at all levels of society to support and facilitate active participation in the decision-making processes.

Strategy 2.A. To minimize the generation of hazardous wastes and risk of exposure to human and environmental health

Objective 3. To promote sustainable financing mechanisms for hazardous wastes management

Strategy 3.A. To encourage joint ventures and partnerships between and among the public and private sectors and public interest groups in financing national hazardous wastes management initiatives.

Objective 4. To develop a comprehensive national data system on hazardous wastes to inform decision-making at all levels.

Strategy 4.A. To establish a repository (data and information on types and quantities) of hazardous wastes within the island.

She then shared the following table (page 7) which outlines the proposed objectives, actions and timelines for the Policy.

Institutional Framework

The decision was made that the MEGJC, with NEPA as the technical agency, would take the lead on the preparation of the document and would report to the Cabinet. A technical working group would comprise the Ministry of Health (MOH) Environment and Health Unit (EHU), Pesticide Control Authority (PCA),

Standards and Regulations Division, EHU laboratory; National Environmental Planning Agency (NEPA), representing MEGJC; National Solid Waste Management Authority (NSWMA and the Office of Disaster Preparedness and Emergency Management (ODPEM) representing the Ministry of Local Government; and representatives from the private sector, civil society and academia. Supporting agencies include the Ministry of Finance and the Public Service, Ministry of Transport and Mining, Jamaica Defence Force (JDF) and the Jamaica Constabulary Force (JCF) from the Ministry of National Security, Jamaica Customs Agency, the Maritime Authority, Fire Brigade, Bureau of Standards of Jamaica and the National Compliance and Regulatory Authority.

In summary, the Policy is in keeping with Jamaica' National Development Plan (Vision 2030 Jamaica) and acknowledges the fundamental rights of Jamaicans as articulated in the Charter of Fundamental Rights and Freedoms Act, 2011 i.e. the right to a healthy and productive environment. It will be reviewed every five years to ensure that it reflects the local situation and amendments recommended as necessary.

DISCUSSION

Ms. Gillian Guthrie arrived shortly after Ms. Felix initiated the consultation and led the discussion on the draft Policy. She said that the work on the Policy had been taking too long and that she hoped that this recent push would result in a finalized Policy. She observed that hazardous waste was not a subject that most Jamaicans considered. Talk of solid waste really was talk of garbage. It was not understood that even within households there was the generation of some hazardous waste which included pesticides, leftover paint, batteries, and electrical equipment and so on.

Export of Hazardous Waste

She pointed out that the country did not have the infrastructure to handle hazardous waste adequately. She informed the group that some companies exported hazardous waste. For example, the bauxite/alumina sector exported PCBS (Polychlorinated biphenyls). Jamaica Public Service also exported some hazardous waste. Producers of lead acid batteries did some exports and there was some export, also, of asbestos. She noted that there was an asbestos cell at Riverton. However, the vast majority of hazardous waste was being stockpiled with permission from NEPA, or being discarded. The Policy was intended to set guidelines. Ms. Guthrie highlighted the transboundary movement of hazardous waste under the Natural Resources Conservation Authority (NRCA) Act that allows for the movement of hazardous waste. The NRCA Act also provided for the licensing for storage of hazardous waste.

Policy Consultations

She noted that the MEGJC had initiated public consultations on the Policy the previous month – with the public and private sectors. The current meeting was the second consultation that was being held with the private sector and the next session would target the public in general. She was aware that when the public became involved there would be several issues arising and the government criticized. The MEGJC was seeking the buy-in of the private sector and looked forward to their commitment to the implementation of the Policy once it had been approved.

Policy Discussion

Ms. Guthrie then opened the floor for general comments. She said that recommendations from this meeting would be shared in ensuing consultations.

Garfield Green from EPAMS Group, felt that the five-year timeline seemed too long. He noted also that the Policy seemed to be focusing on companies and it needed to be targeted more at the community/individual level. He said a lot of harm was being done to the environment through ignorance e.g. burning of garbage. He recommended strategies for policing communities perhaps through environmental wardens. He stated that, generally, companies tried to comply.

Ms. Guthrie responded that while the action plan spanned five years, different aspects would be completed within different time periods. The bigger items, such as the establishment of a hazardous waste cell at Riverton would require more time and greater investment. Legislation and regulations also required time for completion. She informed the group that four of the six legislations in the plan had already been drafted. The regulations dealing with electronic waste was far advanced and the NSWMA would be conducting consultations with the private sector in relation to the take back of end-of-life electrical products.

She emphasized that the aim of the Policy was to call the attention of companies and individuals their responsibilities in relation to hazardous waste. She pointed to item (S) on page 35 – “Encourage consumers to advocate for and purchase green products in order to minimize hazardous waste generation.” She also pointed to items (t) and (u), which were targeted at the public.

***Ianthe Smith**, Environmental and Engineering Managers, asked if reuse and recycling was covered under the Policy.*

Ms. Guthrie said that hazardous waste can be recycled, reused and refurbished. She explained that much of the waste exported through the transboundary movement was actually sent for recycling and not disposal. Examples included, end-of-life phones which, because of their constituents were classified as hazardous waste but would be reused or recycled abroad.

***Lisa Atkinson**, Total Jamaica, recommended that the GHS (globally harmonized system) was a useful tool in classifying hazardous waste.*

Ms. Guthrie noted that GHS was generally used in classifying chemicals.

***Dave Grant**, GB Energy Texaco, observed that the language used on page 35 Section (m) was too mild. He suggested that in order to change behaviour and mindset, some things needed to be mandated. He added that the government and the private sector needed to differentiate waste and put facilities in place for the collection of different types of waste. The separation of waste should be mandated.*

Phillip Morgan of the NSWMA noted that the entity was starting the formulation of regulations regarding waste separation at source.

Ms. Guthrie informed the meeting of a programme that the NSWMA had introduced for the collection of e-waste – computers, printers all for free – in selected communities. It was on the basis of that programme that the regulations were being formulated.

***Ianthe Smith**, Environmental and Engineering Managers, recommended that for effective communication, messages had to be shared through the appropriate media. It was necessary to use media that people were connected to, such as social media. She also pointed to page 33 item 1c – “Encourage the establishment of privately owned and operated hazardous waste treatment facilities and/ or disposal sites.” This was a very broad statement and she also wished to know if there were any incentives being considered for acquisition of equipment for example.*

Ms. Guthrie responded that in terms of awareness raising, when meetings were convened particularly for the private sector the take up was less than desired, but every effort would be made to improve.

***Ianthe Smith** recommended working through technical committees with membership of the private sector.*

Ms. Guthrie in responding to the point on incentives shared that the Development Bank of Jamaica (DBJ) had a portfolio of loans available to the private sector for climate actions and environmental considerations. She added that financing was available to the private sector through the Green Climate Fund. She advised that climate action might include renewable energy, waste management etc.

It was observed that a part of the problem with the take up from DBJ was that their loans were managed by the commercial banks but the banks didn't share the information with borrowers and that there should be direct access to the DBJ.

Ms. Guthrie recommended that the private sector should share these concerns with the Minister who has responsibility for the DBJ – the Prime Minister who had divested the responsibility to Minister Vaz. She promised to raise the issue with the DBJ.

She reiterated that the government wanted to focus on the regulation of the hazardous waste sector and hoped the private sector would take up the operation of the sector. She highlighted medical waste as an opportunity for the private sector to establish facilities to respond to the need.

Stephen Salmon asked if there were any other grants available outside of the DBJ.

Ms. Guthrie advised about a Pilot Project for Climate Resilience, a multi-million dollar, multi-year grant facility that was being implemented through the Jamaica National Bank. The Project, targeted at MSMEs, was related to water conservation and water efficiency. The City of Kingston Credit Union (COK) also had a grants programme – a DBJ product – and she would also make further checks with the DBJ.

Neil Glasgow, *National Rums*, questioned whether, page 36 C and B were addressing the same point. He noted that item B which embodied the polluter pays principle refers to applying charges based on loading by individuals or institutions. He asked whether the basic formulae used for these calculations had been discussed with stakeholders.

Ms. Guthrie emphasized that nothing could go to Cabinet without consultation with all stakeholders. She stated that when the regulations on waste water and sludge were being developed there had been several consultations. The government did not foist things on the public. It was mandated that any submissions to Cabinet had to have evidence of consultation with key stakeholders and the public. Submissions had to include the when and who of consultations.

She noted that the Waste Water and Sludge Regulations were crafted to take note of improvement in quantity and quality of sludge and fines decreased accordingly.

Patricia Lewin, *National Commission on Science and Technology (NCST)*, said she wanted more specific identification of stakeholders that generated hazardous waste, the volume of waste resulting from their activity and the strategies/mechanisms employed in the handling and disposal of waste. She observed that, generally, Jamaica lacked a culture of innovation. She acknowledged that government did not want to coerce actions through taxation. There was need to explore how to introduce an integrated approach to hazardous waste. The Policy is more focused on disposal rather than reduction.

Dave Grant advised that Germany collected computer waste as if they were mining gold and had a very meticulous process of recycling of parts.

Lisa Atkinson noted that this approach was ingrained through the educational system. She shared that Jamaica Environment Trust (JET), in association with NEPA and other entities, had implemented a Schools Environment Programme that was very wide and addressed areas such as energy, water, waste, and one could see a shift in the culture. It was amazing what they had been creating.

Ms. Guthrie shared that the responsibility of the government was to create an enabling environment for private sector to innovate. She hoped that when NSWMA implemented the new E-Waste Regulation under which suppliers had to take back end-of-life electrical product it would result in the development of a secondary industry. Jamaica should not simply be collecting and shipping waste.

Ilanthe Smith pointed to the huge data gap in Jamaica and observed that the private sector needed data in order to plan. She added that regulations generally focused on strictures and confinement rather than the encouragement of innovation.

Dave Grant asked how the private sector could engage academia.

Ms. Guthrie said the government had a relationship with both the University of the West Indies (UWI) and the University of Technology (UTech). They convened an annual meeting to present priorities which would guide the research programmes of the institutions. She recommended that the private sector engage academia directly. The government would be happy to broker such a relationship.

Patricia Lewin, NCST, suggested that private sector could engage institutions directly or through the Ministry of Science and Technology or the National Commission of Science and Technology. She noted that the Scientific Research Council (SRC) hosted conferences and GraceKennedy had a conference the previous year on their innovative process. The NCSU also hosted biennial competitions which were very useful. There were resources available for partnerships and innovation. If the country was serious about an integrated approach and life cycle approach it would be necessary to be able to use the appropriate technology track from port to end of life.

Ms. Guthrie said the government was trying to tighten up on data tracking. She said that ASYCUDA, the platform used by Jamaica Customs Agency, allowed the sharing of information with several regulatory agencies – NEPA, Standards and Regulations Division, and others. The agencies were trying to share information, but the next step would be sharing with stakeholders outside the public sector. She noted that some regulatory agencies were already sharing data. For example, NEPA’s website shows application process. Approved activity was also on the website.

Lisa Atkinson recommended that companies which engaged in annual environmental reporting, this could be collated and shared.

Ms. Guthrie explained that originally there was no objective relating to data collation and sharing and this was added.

It was suggested that insufficient attention had been given to collation of data and outside of the regulatory system no data was reported as there was no enforcement of record management. It was recommended that action had to be mandated.

Ms. Guthrie shared that datasets were collected by NEPA that were not made public. NEPA did not publicize information on the performance of individual companies. She added that the Statistical Institute

of Jamaica produced an annual environmental report. That information was collated from data collected by NEPA and other agencies and so not comprehensive but was a start.

Policy Goal	There were no issues identified with the overall policy goal
Objective 1 (Action E) Strategies?	<p>There were no issues with Objective 1</p> <p>Ms. Felix had indicated that radioactive waste would not be covered under the policy. The question was raised as to why not?</p> <p>Ms. Guthrie advised that the Hazardous Substances Regulatory Authority had already been created by Cabinet to deal with that category of waste.</p> <p>There were no issues with strategies for objective 1.</p>
Objective 2	<p>Ms. Guthrie shared that one of the concerns at previous consultations was that the focus was on what the government would do. It was agreed that expectations of other sectors should be as clearly outlined as for government.</p> <p>It was recommended to finesse objective 2 for clarity. It seemed as if the strategy was the objective and the objective was the strategy.</p> <p>The recommendation was made to move the point regarding minimizing waste to objective 1</p>
Objective 3	No difficulties were identified.
Objective 4	Make accessible to public. The development of a clearing house for sharing information to be included.
A closer look was taken at page 37 in relation to the roles and responsibilities of the private sector.	<p><i>The question arose regarding financing for business opportunities.</i></p> <p>Ms. Guthrie reminded the meeting of the DBJ loan packages and the Pilot Project for Climate Resilience discussed earlier. Also, there was an incubator programme that was accessible through the DBJ. The challenge was to get the information to the relevant people.</p> <p><i>It was suggested that institutions be encouraged to implement better waste management systems. It was also suggested that the wording of the role of academia was too general for a policy.</i></p> <p>Ms. Guthrie noted that she was veering away from being too prescriptive in fear of not capturing everything.</p> <p><i>The wording needed to be more precise and in areas the word “encourage” should be eliminated.</i></p> <p><i>It was observed that EMS was a subset of corporate social responsibility (CSR).</i></p> <p>Ms. Guthrie shared that another policy being worked on was the Environmental Management System (EMS) which was at the white paper stage awaiting final approval from Cabinet. That Policy addressed the observation of the tenets of EMS by the private sector which would, in turn, speak to how private sector would deal with surrounding communities.</p>

	<p>Dave Grant cited the actions of foreign companies which had the responsibility of ensuring that they left communities in their original status or improved, hence CSR in protecting the environment. He gave the example of lead company which had contaminated the soil and proper due diligence was not observed in ensuring this information was placed on the title and some years later a basic school was built on the property causing harm to children.</p> <p>Ms. Guthrie noted that the recommendation would be for a minimum standard to be observed in such cases. She asked NEPA whether companies that closed were required to rehabilitate the affected site.</p> <p>Bethune Morgan of NEPA said a closure plan had to be implemented to remediate and restore area.</p> <p>Ms. Guthrie noted that while a system was already in place to restore sites, there were some legacy (contaminated sites) for which the government had to take responsibility. Private sector needed to be aware of the closure plan.</p> <p>On pages 12-13 listed policy instruments.</p>
Page 49	<p>Ms. Guthrie pointed to the list on page 49. She would replace this list with a URL to NEPA’s website to accommodate sharing of updates. She asked if NEPA’s website had a list of approved permits for the transportation of hazardous waste or could the public get access to approved permits.</p> <p>Bethune Morgan, NEPA, said there was a list of approved permits on the website.</p> <p>Dave Grant enquired whether there was a list of companies who had facilities to treat contaminated sites.</p> <p>Calvin Barham, Initial Traders, said his company was awaiting approval.</p> <p>Bethune Morgan said while she knew of a company with that capability it did not do so commercially but just for internal purposes. There were several companies which had applied for permits for themselves. She added that a company could apply for a permit to deal with specific external sites. She raised the question of non-regulated entities such as garages that had tyres piled up, as well as, contamination from oil.</p> <p>She noted also that private hospitals, medical centres and doctors’ offices were not required to record anything, records only exist from services provided to them by NEPA. She suggested that perhaps the E-waste regulation may facilitate some records based on what is deposited at central sites.</p> <p>Phillip Morgan, NSWMA, stated that under the new regulations these entities would be required to report information on type and volume of waste.</p> <p>Ianthe Smith asked about the mechanism for reporting. If there was no mechanism for reporting entities might cook up numbers.</p>

	<p>Phillip Morgan shared that the law will mandate entities who sell electrical products to take back end-of-life products. All such businesses had to be registered in order to dispose of them at the collection centres which must record everything collected. In addition there would be licensed consolidators who also had to report on all items collected detailing how they were treated and broken down for export.</p> <p>He noted that another regulation would be dealing with all waste disposal facilities – recycling, composting, general garbage disposal – the regional bodies across the island also have to report to NSWMA of all waste collected including categories and how they have treated the waste.</p> <p>Dave Grant observed that many small garages were not licensed, their storage arrangements were inadequate and the soil contaminated. He recommended the government institute a licensing system which would require them to pay a small fee.</p> <p>Ms. Guthrie agreed that a system needed to be established to capture these smaller facilities because they were generating hazardous waste (collectively this represented a large volume of hazardous waste) and there was no knowledge of how they were treating/handling their waste material. Stored or discarded?</p>
	<p>Ianthe Smith said it was important to ensure that there were no overlapping or conflicting policies resulting in confusion regarding the agency with responsibility for certain activities.</p> <p>Ms. Guthrie explained that was precisely the reasoning behind the public sector consultancy as different agencies were working on different policies and would thus reduce this eventuality.</p>
	<p>Kwesi Gordon questioned what methods would be utilized to encourage/mandate entities to adjust their resources/processes to comply with the reduction of hazardous waste.</p> <p>Ms. Guthrie pointed to the actions on page 34 related to the minimization of hazardous waste</p> <p>It was agreed that standards must be able to ensure that where reasonable and appropriate the changes are to be made. He added that it was hoped that the sensitization programme will be effective in bringing all stakeholders on board.</p>

Ms. Guthrie closed the session by thanking all participants for their attendance and participation. She thanked the MEGJC’s partners in the effort: Phillip Morgan of NSWMA; Bethune Morgan from NEPA; Navrine Hylton from MOH; Joanne Felix from MEGJC and Patricia Lewin of the NCST. She noted that these were officers who would be able to assist if there were any further questions. She hoped that the private sector was now on board. She provided her email address for the comments on the Policy to be sent – Gillian.guthrie@megjc.gov.jm. With a coy to joanne.felix@megjc.gov.jm.