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Policy Paper

Alternatives for Financing Waste: Implications for Ghana's Growing Electronic and Electrical Equipment Waste

8 ABSTRACT

The waste of electrical and electronic equipment pose an environmental and human health 9 10 challenge for some developing countries, including Ghana. Despite such challenges, it 11 contributes to job creation and income generation if properly collected and processed. This 12 type of waste may contain precious minerals including gold and mercury. However, the processing of such waste is dominated by the informal sector. Due to the availability of 13 14 finance, they resort to unhealthy such as burning and crushing as a means of processing this 15 waste, thereby, exposing themselves and the environment to poisonous metals and 16 substances. To curtail the problems created by this waste, the government proposed the 17 establishment of fund to enable the country secure the needed capital to deal with this waste 18 problems. The paper uses documentary review to assess the proposed government approach 19 to funding of this waste. It proposes an alternative model of financing of this waste. It 20 recommends, among other things, the need to promote this sector as a business venture and 21 encourage the participation of private, public, foreign and domestic investment. The said 22 investment is expected to promote the acquisition of the needed technology.

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24 KEYWORDS: Financing, Electrical, Electronic Waste, Ghana

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26 **1.0 INTRODUCTION**

Ghana launched the National ICT Policy in 2003 with the goal of engineering an ICT-led socio-economic development process with the potential to transform Ghana into a middle income, information-rich, knowledge-based and technology-driven economy and society [1]. The focus of the policy was to promote the deployment of ICT in all areas and sectors of the economy, including the production and distribution of goods and services as well as the modernization of agriculture, health and governance. Among the critical areas targeted for the deployment of ICT also included education and health care delivery. As a key success factor,

taxes on ICT equipment for health and education purposes were reduced or removed. These included mobile phones [2][3]. All these culminated into an influx of ICT gadgets and equipment being imported into the country, especially computers for educational or health purposes. A large volume of these came through donation to schools and charity homes. Apart from computers, another electrical equipment that comes in as gifts is hospital equipment, including used X-ray machines, diagnostic machines, and ICT scanners among others.

41 A 2011 report, on Ghana Electronic Waste (e-waste) Country Assessment showed Ghana 42 imported 215,000 tons of electrical electronic equipment (EEE) with 64,500 (30%) being 43 new. As [4] and [5] submit, about 70% of this electrical and electronic equipment imported 44 into the country are used products. Furthermore, 97,825 (65%) of the used ones come into the 45 country in good working condition. Another 37,625 (25%) can only function after repairing 46 or refurbishing them. An estimated 15,050 (10%) come into the country are broken and 47 unsalvageable. Whether these EEE come into the country used or brand new, what matters is 48 how their end-of-life is managed. This is because, waste of electronic and electrical 49 equipment (WEEE) if improperly handled have negative health and environmental 50 implications for the society. WEEE is found to be a valuable resource if properly managed. 51 However, the current situation of WEEE in Ghana is more of a menace than a blessing. 52 Several studies have documented the negative health, environmental, social and economic 53 impact of electronic waste, especially in the cities where landfills are located.

These studies had originated from known areas of EEE problems including Ghana [6] and in India [7]. Furthermore, [8] and [9] conducted research on the same subject in China. Findings from such studies indicate significant display of toxic elements in the blood stream, serum, scalp hair, human milk and urine of people working or living in places of massive e-waste. Waste management is a major issue in major cities in developing countries, especially in Sub-Saharan African countries including Ghana.

60 Meanwhile, there are few companies, limited technologies available for the collection, sorting 61 and processing of e-waste in the country. This comes against the backdrop of limited 62 investment into e-waste management, despite the increased in the generation of such waste. 63 According to [10], about 30% of the EEE imported in 2009 did not function and therefore 64 were waste. The resultant effect is about forty thousand (40,000) tonnes of waste. This view 65 is supported by [11], who put the total EEE in the same at 215,000 tons, with 70% being used 66 products. With the coming in of the ICT policy and the penetration of ICT in Ghana, the 67 volume of e-waste continues to increase in the country. However, there are few formal e-

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68 waste management companies in the country to handle the huge e-waste generated. For the 69 few companies that operate in the sector, their main activity is the collection and dumping of 70 the waste at designated landfill sites. The sector is highly dominated by informal sector, 71 mainly small and medium enterprises (SMEs). These businesses are involved in the 72 collection and processing of e-waste in the cities and towns. However, their methods of 73 processing have been crude. For instance, burn e-waste to extract copper wires contained in 74 this equipment. Appendix 1 and 2 show an informal e-waste processing activity at 75 Agbogloshie in Ghana as contained in the e-waste country assessment report on Ghana, 76 published in 2011 under SBC e-Waste Africa Project.

78 Such approach to dismantling WEEE leads to loss of important and valuable elements 79 (especially gold and mercury) contained in this equipment. If properly managed, WEEE has 80 the potential to create jobs, generate income and improve the livelihood of those engaged in 81 such businesses. A paper published in the Seattle Journal of Environmental Law, in 2015, 82 revealed that 10 to 13,000 metric tons of WEEE is processed in per year in only Accra. This 83 contributes about US\$105 million to US\$268 million into Ghana's economy. Furthermore, 84 the processing of WEEE using these crude methods sustains between 121,800 and 201,600 85 people in Ghana. What this means is that with the right investment and efficient recycling facilities, the country could earn more, create more jobs and improve the standard of living 86 87 for those engaged in the business. The paper analysis the suggested mode of financing WEEE 88 as contained in the E-Waste Act of Ghana and proposes other alternative modes of financing 89 e-waste in Ghana. The rest of the paper is divided into FIVE parts. Part two looks at the 90 theoretical framework and the existing financing models. The third part looks at looks at the 91 research method. The framework for financing WEEE is in Part four. Part five looks at 92 conclusion and recommendation.

93 2.0 THEORETICAL FRAMEWORK

94 It established in previous studies [12] e-waste is a major problem because it causes 95 environmental damage and a severe human health concerns if not properly handled. This is 96 because it often contains high amounts of toxic and environmentally sensitive materials and 97 thus, hazardous to humans and the environment, if improperly disposed or recycled [12]. 98 This, notwithstanding, e-waste is found to provide huge business opportunity due to the rich 99 minerals it may often contain. This view is expressed in the waste-to-resource (WTR) 100 ideology. The WTR is supported by the wealth creation and profit maximisation theories of 101 the firm. High profit margins may lead to growth and survival of the firm. Firms create

wealth through innovation and invention of new products. The WTR to creating value occursthrough refurbishment, recycling, reclaiming or re-use.

104 Furthermore, production theory suggest that the production is complete when it reaches the 105 final consumer. This WTR philosophy extends the production ideology, making producers 106 the final consumers through their extended responsibilities towards the environment. By extended producer responsibility (EPR), producers are made accountable for complete life 107 108 cycle of the product from the source of raw material, through to processing, distribution as 109 well as the disposal after the product's useful life. This include strategies such as take back reuse, reduce, recycling and recovering approaches [13] [14]. [15], emphasised on post-110 111 consumption phase of the product's life cycle as they talk about EPR. Previous studies have 112 emphasised on the competitive advantage gained by firms due to better design impact of EPR 113 [16]. From purely corporate social responsibility (CSR) perspective, [17] opined that EPR is 114 an indication of corporate stewardship and good citizenship.

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However, despite the major concerns, e-waste is a potential source of income if the valuablematerials contained in them are properly recovered.

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Due to the complicated nature of e-waste and the harm it may cause to those involved in the e-waste business, it is necessary to use the right technologies in its processing. However, this comes with the relevant cost. According to [12], in some instances, the benefits for collection and recycling of e-waste might be less than the revenues generated from the recovered materials if the right technology is not used. This calls for adequate investment into the sector.

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125 From the stakeholder theory perspective, financing the sector should be the responsibility of all 126 the actors within the value chain; i.e. producers, distributors and consumers, with the government 127 and international community acting as the interveners. The theory is of the view that there are 128 various groups in society that have interest in the activities of business, and hence has the ability 129 to influence how a firm conducts its activities. It opines that the power and influence of the actors 130 significantly influence corporate practices. Analysing the critical role of these groups in society, 131 [18] based on this theory identifies several interest groups in a firm's activities including 132 suppliers, shareholders, civil society organisations, the media, consumers, competitors as well 133 as state and its agencies.

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135 Similar to other industries, interest groups in the electronic and electrical equipment industry 136 has the power to influence how corporate bodies in sector conduct business. It has therefore, 137 been argued that any finance initiative should revolve around the actors in the sector [19]. 138 Therefore, the understanding of the financing of electronic waste must be looked at within the 139 context of these interest groups. In the view of [12], there are three main stakeholders who 140 could bear financial responsibility for end-of-life management of any kind of waste including 141 entire society, waste holders and producers. The ensuring sections discusses some traditional 142 finance models that have been suggested for Ghana

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2.1 EXISTING FINANCING MODELS

145 Existing studies [20] and [12] on e-waste financing has concentrated on manufacturers 146 through the extended producer responsibility (EPR). What is missing is whether suppliers of 147 electronic inputs for the producers of EEE fall within the category of producers. [12] outlines 148 three proposed and existing financing schemes for some countries. The first model is 149 consumer e-waste financing (CEF) approach. This is the model in California and Japan. In 150 California, consumers pay for the management of e-waste upon purchase of new electronic 151 and electrical appliance. In the case of Japan, consumers pay for disposing the electronic 152 equipment. This strategy as [21] suggests, provides an up-front finance for the management 153 of e-waste. However, it may lead to illegal dumping by consumers who want to avoid the 154 payment of fees.

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156 The second is the *producer e-waste financing* (PEF). The countries using this approach (also 157 known as extended producer responsibility) include South Africa, Kenya, India and Europe. 158 In South Africa, the plan is to get producers pay into a fund to be disbursed to producer 159 responsibility organization. Kenya proposes a model where, producers pay for the net 160 treatment costs directly to recyclers.

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162 The European model deviates slightly from other practices of EPR. The European model as 163 deduced from the work by [21], focuses on getting producers to invest more in product design 164 and re-manufacturing as well as financing the establishment of new industry in the collection, 165 dismantling and processing of e-waste. The next approach is the shared e-waste financing 166 (SEF) model. The SEF as proposed for Ethiopia is a combination of EPR with electricity bill 167 (or municipal solid waste fee) increase. Meanwhile, the method is described as a fair allocation of financial responsibilities among two different stakeholders – manufacturers and
society.

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171 The issues with the existing models is that they appear to be mitigating measures than to raise 172 funding to take advantage of the opportunity the sector presents. E-waste is touted a valuable 173 income stream [22]. A report by the [23] estimated Americans dump phones containing over 174 US\$60 million in gold/silver every year. According to the report, for every 1 million cell phones that are recycled, 35,274 lbs of copper, 772 lbs of silver, 75lbs of gold and 33lbs of 175 176 palladium can be recovered. Although there is no consensus on the annual total value of 177 global e-waste trade, findings from various empirical studies show the sector is profitable if 178 properly exploit. For instance, [24] estimated the intrinsic material value of global e-waste to 179 be 48 billion euros in 2014. According [25], in 2009, the e-waste trade (primarily the black 180 market) was estimated to be US\$11 billion. The study concludes the industry remains 181 profitable based on its current exploitation of developing nations. Furthermore, [26] submits 182 that individual European companies involved in the e-waste black market make more than $\notin 2$ 183 million per year. As indicated earlier, WEEE contributes to between US\$105 million to 184 US\$268 million into Ghana's economy despite the crude technology used in its processing.

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186 Furthermore, it is estimates that 600 forty feet super containers of WEEE are shipped to 187 Accra, Ghana on a monthly basis [27] [28]. In less than two years, majority of this WEEE 188 finds, their way into landfill sites, rivers and gutters since the people and the small businesses 189 involved in the e-waste trade has not the expertise, finance to acquire the needed technology 190 to process the waste into resource. Given the volume of WEEE that is generated annually in 191 Ghana, the question is if the above options for financing is adequate. It has been suggested 192 that with the right technology and investment, it could contribute significantly to the 193 economy. The paper provides some financing options for the processing of e-waste into 194 resource or other useful products.

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196 2.2 GHANA'S PROPOSED E-WASTE FINANCING MODEL

Ghana's E-Waste law that was passed in 2016 largely makes producers responsible for the management of waste in the country. This is similar to legislations in South Africa and Kenya, where there is extensive producer responsibility in the payment for the cost of managing e-waste. Under the new E-Waste Law of Ghana, it required of manufacturers and importers of electronics, excluding state agencies, to register with the Environmental

Protection Agency and to pay levies that would go into a fund for the collection, treatment, recovery and environmentally-sound disposal of electronic waste [29]. Similar to some existing models like the Educational Trust Fund, Ghana Road Fund, National Health Insurance Scheme, the question is how such a fund must be managed. Should an institution from the public or the private sector be responsible for managing such a fund or the private sector?

208 In this model, financial responsibility is allocated to producers but the organizational role 209 remains with the government. However, whether this works depends on the location of the 210 producers. The sector is largely dominated by the informal sector, operating unregistered 211 businesses. According to [30] 40 to 60 per cent of domestically generated e-waste is recycled, 212 out of which 95 per cent is done informally. Meanwhile, [31] maintain that replacing the 213 informal sector with a formal one is impractical. Therefore, any legislation and financial 214 strategy should aim at the informal sector. This is another challenge for the proposed 215 financing model for the sector.

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217 The next point is how to tackle the issue of donation of electronics and electrical equipment, 218 especially computers that are given as gifts to institutions and schools. The question is who 219 pays for the taxes to be imposed on such EEE as being proposed by the new WEEE law. How 220 can these donating institutions ensure the functionality of these equipment before giving them 221 out? The country, like any other developing nation, depends on donations. There is evidence 222 that e-waste is send to Africa and Ghana in the name of donation [32] [29]. The volumes of e-223 waste in Ghana continues to increase. Two reasons account for this. First is the rapid growth 224 in global volumes of e-waste generated. In 2014, 41 million tonnes of e-waste estimated at 225 GB£34m were discarded world-wide [33] [34]. However, only 6million tonnes out of the 226 huge volumes of e-waste was recycled. The greater percentage of the unprocessed e-waste 227 eventually find their way to Africa and Ghana. [29] reports that 20 to 50 million tons of e-waste 228 are generated in the world annually and a great amount of that ends up in developing countries 229 including Ghana and Nigeria. Second reason accounting for the increase in e-waste is the 230 positive impact of the National ICT introduced in Ghana in 2012. The aim of the programme 231 was to increase the use and penetration of ICT in both social and economic activities in the 232 country. This had led to increase usage of ICT in education and governance. Ghana now 233 generates a substantial e-waste domestically. So the question is how the proposed financing 234 model sustains the management of the ever-increasing e-waste in the country.

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Furthermore, it is difficult to control or manage the situation where importers pass on the additional cost (by way of levies or taxes on EEE imports) to consumers. The idea of levying dealers of EEE as a way to raise funding for the proposed e-waste fund is the possible price pressure on consumers. Economic theory argues that producers would shift the effect of tax on prices to consumers, especially where the product is one of a necessity product [35] [36]. The effect, if not carefully, analysed would be to discourage the patronage and use of EEE. This certainly would negatively impact on the ICT4U programme of the country.

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Further question that needs to be answered is whether revenues generated from levying dealers of EEE is adequate for dealing with the e-waste menace now and for the future. A recent survey by the UNOPS showed that between 2010 and 2014, 15,481,721 metric tons of new EEE were imported into the country. A total of 595,328 tons of old EEE were imported during the same period [37].

The current approach to funding e-waste suggests e-waste is still considered as just waste and not resources. However, as discussed earlier, WEEE has the potential of generating wealth and jobs for a country if given the necessary attention and investment. It is on this note that we proposed more sustainable model for financing e-waste in Ghana.

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254 **3.0 RESEARCH APPROACH**

The paper adopts documentary content analysis [38] approach to research. This is found to be rigorous for the exploration of important but difficult-to-study issues of interest [39]. The approach of the paper is to make replicable and valid inferences by interpreting textual material. Primary data was used and sourced mainly from printed publications including books, magazines, newspapers, websites, public records, media reports, private papers, strategies, and policies, action plans by public bodies or organisations.

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262 The research approach involved analytic reading and review of relevant written materials. 263 Then, the relevant portions that were in line with the study objective were then extracted. 264 There were three stages in the approach to this analysis. First is *preparation*. This is the stage 265 where the materials required for the analysis was identified and collected. This involved 266 identifying the possible source of the necessary data. This is followed by material review and 267 sorting. In this stage, the documents collected were studied in details and categorised with 268 reference to the study objectives. The final stage was the deductions and thematic write-up 269 stage. In this stage, deductions were made from a detailed study of the documents collected,

making inferences and drawing conclusions based on the views, opinions and findings from
previous studies. Results from the analysis were presented thematically; proposing a
financing alternative for the management of e-waste in Ghana.

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274 4.0 THE PROPOSED FINANCING MODELS

There is evidence to support the view that the state cannot solely on a national fund to support waste management in the country [40]. Private Sector Participation (PPP) can help mobilize resources, reduce risks, contribute to economies of scale and enhance service delivery [41] [42]. However, a PPP model would operate better if there is national framework for e-waste would incorporate a business sense or describe returns on investment for private investors in the sector. The paper, therefore, proposes the following models for financing e-waste in Ghana including the state or the national fund:

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283 4.1.1 Domestic/FDI in waste Processing

284 The sector requires the inflow of investment like any other sectors of the economy. 285 Investments can come from both domestic and foreign direct investment. There are currently 286 no statistics on the total investment required for the management of the current electronic 287 waste in Ghana. But the statistics on the import of EEE into the country [37] suggest more 288 funding is required in dealing with the end-of-life of these electronics and electrical devices. 289 Furthermore, WEEE provides business opportunity with good returns. A 2015 United 290 Nations report, cited in [21] projected the global WEEE production to 50 million metric tons 291 by 2018, from the approximated 41.8 million metric tons in 2014. Global e-waste recovery 292 market holds enormous revenue potential and is expected to reach \$21 billion by 2020, 293 growing from \$6.9 billion in 2009. [43], [24] found the revenue generated from the e-waste 294 management market is expected to grow from \$9.15 billion in 2011 to \$20.25 billion in 295 2016at a compound annual growth rate of 17.22% from 2011 to 2016. The implication is that 296 the sector provides business opportunity for investors.

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298 4.1.2 Public Private Partnership

Public private partnership has been used to finance numerous and similar projects in Ghana.
According to [44], PPP introduce private sector resources and/or expertise in order to help
provide and deliver public sector assets and services. These include the Ghana Community
Services Network Ltd (GCNet), solid and urban waste management [45] [46], urban and

small-town water provision [47]. Public private partnership would help pool funds and skillsfrom the two sectors for the funding of the e-waste activities.

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306 4.1.3 Private Private Partnership

307 This takes the form of joint ventures, mergers and strategic alliance. Due to the huge 308 investment required to finance e-waste business, it requires the pooling of resources. Private-309 private partnership and strategic alliance is not common practice in Ghana and Africa. 310 However, if properly explored, it would raise the needed capital for the establishment of e-311 waste business. In Ghana, mergers as a mode of raising capital has been found in the banking 312 sector, especially from the period between 2009 and 2014, when the Bank of Ghana increased 313 the minimum capital requirement from GHS60M to GHS120M. There is the need for the 314 small and medium sized waste management firms currently operating in the sector to go into 315 strategic alliance and joint ventures to enable them raise the needed capital for the taking 316 advantage of the opportunities in the sector. Beside two private local companies going into 317 alliance, domestic waste management companies can also go into alliance with foreign 318 private companies with the technology to process WEEE in the country.

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320 4.1.4 Public Public partnership

321 Public-public partnership mode of financing could be in the form of grants and donation (i.e. 322 technology or capital) to deal with WEEE in the country. The state receives numerous grants 323 and donations for undertaking numerous projects including poverty reduction, malaria 324 prevention and reducing HIV/AIDS prevalence. Such grants could be extended to e-waste 325 sector to enable the state raise the needed funding for the management of such harmful waste. 326 For instance, the German Federal Ministry for Economic Cooperation and Development 327 (BMZ), has partnered and sponsored similar projects in Ghana including Sustainable 328 Economic Development in Ghana as well as projects such as sustainable access to modern 329 energy services. There is even multiple project funding for Ghana by GIZ and the 330 Netherlands Directorate General for International Cooperation (DGIS) and the Danish 331 International Development Agency (DANIDA).

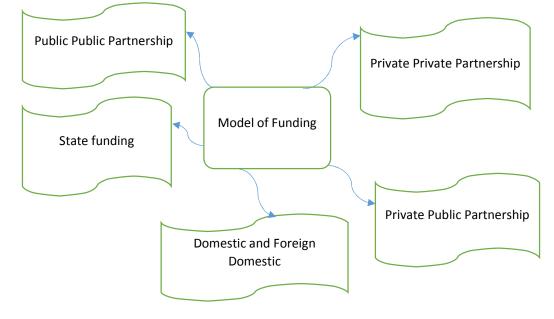
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333 4.1.5 State Funding of E-waste Projects

The business of electronic waste is largely dominated by the informal sector. As indicated earlier, government funded e-waste project would help create jobs and at the same time

336 reduce the negative environmental impact of e-waste. As a means of funding, government 337 can raise the needed capital by taxing second-hand EEE imported into the country. The state can issue bonds to finance e-waste. Funds from taxes on EEE and from issuing securities can 338 339 be used to set up a waste management fund. This fund should be made accessible for 340 MSMEs to enable them acquire the needed capital required for operating a business in the 341 sector. This deviates from some existing models from other countries that use strategies such 342 as consumer levying for buying EEE or dumping it. The aim of public or state funding has 343 been purely on non-profit making motive.

344 Figure 1: Alternative Source of Funding E-waste in Ghana



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349 5.0 CONCLUSIONS AND POLICY RECOMMENDATION

The waste from electronic and electrical equipment creates both problems and opportunities for individuals (investors), corporate bodies and the state. The problem of e-waste is not only created by the influx of WEEE from the developed countries, but e-waste is also generated domestically. This is contrary to the existing view that the WEEE problem is created by waste from developed countries.

Electronic waste is a resource than just a waste. However, the current approach to managing

e-waste is short of business sense that enables the sector to attract the needed investment.

357 The sector is the source of job creation and income generation for most people in the informal

- 358 sector. However, there is little by way of technological adoption due to limited investment in
- the sector.

The current WEEE funding strategy is more of raising money to mitigate the environmental and health hazards that comes with WEEE.

The current and the proposed approach to funding e-waste have the tendency to impact negatively on the national ICT4U policy. The policy aims at improving the adoption and usage of ICT in the country.

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365 5.1 Policy recommendation

366 Develop a national framework for supporting the establishment of eco-innovative MSMES in

the e-waste sector. Such framework should identify the sources of financing such businesses,

368 and these financing sources should include private, public or both sources. Both domestic and

- foreign sources of funding would be critical in financing e-waste activities in the country.
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The strategy of imposing taxes on EEE to raise funds for e-waste activities would have a negative impact on the ICT4U policy of the country. The alternative source of funding other than taxation would help in the attachment of the national ICT programme goals. Meanwhile, in imposing taxes on the e-waste business, policymakers should be conscious of the attitude of the informal sector towards the payment of taxes. There is the tendency for the operators of these small businesses to go 'undercover' if they feel threatened by the effect of taxes on their businesses.

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There is the need to promote e-waste as a business venture and encourage the participation of larger businesses. Such larger businesses are likely to put more investment into such activities and acquire more or higher technology.

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E-waste business operators can mobilize more resources and introduce superior technology to managing WEEE to help them expand their businesses to enable them employ more people.

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One of the key success factors for improved e-waste business, is the willingness of consumers and their associations to patronise and pay more for environmentally friendly products. Furthermore, middlemen/distributors and companies must through their CSR activities extend their responsibility to distribution, consumption and disposal.

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