

NEMA Position Statement on End-Of-Life Management of Electrical Products

October 2018

NEMA products constitute the very foundation of the worldwide infrastructure that underlies the generation, transmission, distribution, control, and end-use of electricity. They provide power safely, efficiently, and reliably for every aspect of human endeavor.

For decades, NEMA companies have been at the forefront of environmentally conscious design of electrical products and systems. They have steadily reduced the use of hazardous materials where possible without compromising safety and performance standards. NEMA also supports proper management of spent products at end-of-life and members in some sectors have been active participants in collection, recovery, and recycling activities.

In general, however, NEMA believes that decisions about end-of-life management of electrical products¹ should reflect an unbiased assessment of viable options, guided by scientific evidence and careful consideration of costs and benefits. This process may or may not conclude that collection and recycling is the optimal approach.

When recycling is the chosen option, NEMA believes that effective, cost-efficient systems can be achieved only if all parties involved in the supply, distribution, and consumption or use of the product are engaged in the process. Each stakeholder – manufacturers, distributors, retailers, consumers, and all levels of government – has a particular role and function to play and none should bear the sole responsibility for collection and recycling programs.

NEMA supports end-of-life management solutions that are consistent with the following principles:

- **Shared Responsibility and Risk:** All stakeholders should be engaged in the end-of-life management of electrical products. Financial and administrative responsibility, risk, and enforcement should not fall singularly on one group of stakeholders
- **Rational and Attainable Program Goals** – Goals should be realistic and linked to the outcomes of various stakeholder roles and responsibilities and reflect the unique characteristics of products and markets
- **Cost Efficiency:** Systems should be designed to be as cost efficient and inexpensive to consumers as possible
- **Accessibility:** End-of-life management systems must be accessible to consumers. Accessibility encompasses convenience, awareness, and minimal cost

¹ “Electrical products” are defined here as excluding medical devices and systems designed principally for use in clinical and other medical settings, and to include only medical devices principally marketed for sale or resale to consumers for personal use.

- **Environmental Benefit Commensurate with Cost** - The costs of actively managing a product at the end-of-life versus treating it as solid waste must be commensurate with the environmental benefits associated with preventing its disposal
- **Public Good** – All consumers benefit from a cleaner environment—in cases where costs cannot be allocated in a reasonably economic manner, government should assist in support of the program.

The Board of Governors will review implementation of these principles and accomplishments as necessary.