

**UNEP/CHW/OEWG.14/INF/9**

25 June 2024.

**Comment Technical guidelines on the environmentally sound  
management of waste lead-acid batteries**

Madam Co-chair, I on behalf of Environment and Social Development (ESDO) a participating organization of IPEN would like to comment on this technical guideline.

Madam Co-chair, this guideline does not solely focus on the environmentally sound management of waste lead-acid batteries. It also pertains to occupational safety and hazard reduction. Unfortunately, the draft does not adequately address this issue. Environmental health, including lead pollution, is not sufficiently reflected in this draft. Informal recycling, such as the use of lead acid battery-ULAB, is not addressed. Information about lead acid batteries is crucial for this technical guideline.

Technical and financial mechanisms are crucial for implementing the guideline, so it is imperative to address the issues related to technical assistance and financial mechanisms for all developing countries.

I thank you madam Co-chair.

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