

How Your Recycling Company Can Deal With Electronic Waste?

Posted on October 17, 2019

Background

The original article presents a proposal for establishing a service to collect and manage used electrical and electronic equipment in West Africa, with particular attention to Nigeria. The central environmental concern is legitimate: discarded electronics can contain valuable metals as well as lead, mercury, brominated flame retardants, batteries, refrigerants, and other substances that create risks when devices are burned, broken, dumped, or chemically processed without safeguards. Informal recycling can provide income and recover useful materials, but uncontrolled dismantling and open burning can expose workers and nearby communities to toxic dust, smoke, contaminated soil, and polluted water.

A modern feasibility analysis must also correct the original assumption that Europe can simply ship obsolete equipment to a Nigerian recycling business. International movement of hazardous and other wastes is regulated under the Basel Convention, and amendments that entered into force on January 1, 2025 expanded controls for electrical and electronic waste. (Basel Convention Secretariat, 2025) Shipments classified as waste require the consent and documentation required by applicable international and national law. Used equipment genuinely intended for direct reuse may be treated differently under relevant rules, but exporters must not disguise nonfunctional waste as reusable products. Therefore, the proposed company should prioritize lawful domestic collection and verified reuse, and any cross-border material should be accepted only after classification, consent, contract, testing, and regulatory review.

Problem Definition

Electrical and electronic products have short and changing life cycles. Consumers replace phones, computers, televisions, appliances, batteries, and office equipment because of failure, software change, fashion, repair cost, or new features. Businesses also retire large volumes during technology refreshes. When formal take-back systems are weak, discarded products move through informal collectors, repair markets, dumps, scrap yards, or ordinary waste streams. Reuse can extend product life and reduce resource demand, but equipment that cannot be repaired eventually requires safe material recovery and disposal.

The challenge is to create a system that captures value without transferring environmental and health costs to workers and communities. This requires collection networks, repair and testing capability,

controlled dismantling, downstream recyclers, data security, worker protection, environmental monitoring, and transparent records.

Proposed Business Model

The proposed enterprise would operate as a licensed collection, reuse, refurbishment, dismantling, and materials-management company. It would accept equipment from households, businesses, government agencies, schools, retailers, repair shops, and producer take-back programs. Products would first be weighed, recorded, and triaged.

Functional devices could be cleaned, tested, repaired, and resold with documented condition and warranty. Reusable components could be harvested for repair markets. Non-repairable equipment would be dismantled into controlled material streams such as circuit boards, ferrous metals, aluminum, copper, plastics, cables, batteries, lamps, and glass. Hazardous fractions would be stored securely and sent only to qualified downstream facilities.

Domestic Collection

Domestic sourcing should be the core of the operation because it reduces legal complexity and directly addresses waste generated in the country. Collection agreements can be established with companies replacing computers, telecommunications providers, retailers, universities, banks, government agencies, and municipal programs.

Household collection requires convenient points and clear incentives. Drop-off centers, scheduled collection events, retailer return programs, and payment for selected devices can increase participation. Public communication should explain which items are accepted and should warn people not to discard batteries or electronics in ordinary waste where alternatives exist.

Cross-Border Movement

The original proposal suggests purchasing or receiving obsolete electronics from Europe. This is the highest legal and ethical risk. The Basel Convention controls transboundary movement of hazardous waste, and the e-waste amendments brought all electrical and electronic waste under prior-informed-consent procedures among parties. The European Union also applies its own waste-shipment rules.

The company should not accept a shipment merely because an exporter labels it “used electronics.” Contracts should require testing records, product lists, condition, intended use, classification, origin, and proof of lawful authorization. Regulators in exporting, importing, and transit countries may need to approve the movement. Containers should be inspected before acceptance, and illegal shipments should be handled according to government direction rather than quietly processed.

Reuse Versus Waste

Reuse can provide affordable equipment and extend product life, but it becomes problematic when broken or obsolete products are exported under the appearance of reuse. A genuine reuse operation should test equipment before shipment, package it to prevent damage, provide documentation, and have a realistic market and remaining useful life.

Equipment requiring major repair may already be waste under applicable law. The company should maintain written criteria defining tested working equipment, repairable domestic equipment, parts harvesting, and recycling streams. These criteria should be reviewed by environmental and customs authorities.

Facility Selection

The processing site should not be selected only on cheap land. It requires suitable industrial zoning, road access, reliable power, drainage, fire protection, secure boundaries, and distance from sensitive receptors such as homes, schools, wells, and flood-prone areas. An environmental and social assessment should evaluate air, water, noise, traffic, fire, and hazardous-material risks.

Floor surfaces in receiving and dismantling areas should be impermeable and easy to clean. Roofed storage should protect electronics and hazardous fractions from rain. Separate zones are needed for batteries, lamps, refrigerant-containing equipment, data-bearing devices, repair, dismantling, and finished materials.

Worker Health and Safety

Workers may be exposed to cuts, heavy lifting, electricity, fire, dust, lead, mercury, battery chemicals, refrigerants, and sharp glass. The hierarchy of controls should guide prevention. Dangerous processes should be eliminated or enclosed before relying only on personal protective equipment.

Mechanical ventilation, local extraction, guarded tools, lifting aids, safe workstations, handwashing, changing facilities, spill kits, first aid, and fire systems are necessary. Workers need training in hazard communication, battery handling, electrical isolation, chemical exposure, and emergency response. Respiratory protection should be used only within a properly managed program when engineering controls cannot reduce exposure sufficiently.

Prohibited Practices

Open burning of wires and plastic should be prohibited. Heating circuit boards over uncontrolled fires, acid leaching without engineered containment, breaking mercury lamps, and dumping residues on soil should also be prohibited.

These methods may recover valuable metals cheaply but transfer the cost to worker health and the environment. The company's competitive advantage should come from efficient formal processing and verified downstream markets rather than replicating informal hazards behind a fence.

Battery Management

Lithium-ion, lead-acid, nickel-metal hydride, and other batteries require separate handling. Damaged lithium batteries can enter thermal runaway and cause difficult fires. Terminals should be protected against short circuits, and storage should follow fire-code and manufacturer guidance.

Lead-acid batteries should be kept upright in contained areas and sent to licensed recyclers. Workers should not manually break batteries without engineered processes. Battery records should identify weight, chemistry where known, storage date, and destination.

Mercury and Lamps

Fluorescent lamps, some displays, switches, and older equipment may contain mercury. Intact lamps should be removed carefully and stored in closed containers that prevent breakage. Broken lamps require controlled cleanup and ventilation.

Mercury-containing waste should be transferred to approved treatment or disposal facilities. Ordinary vacuum cleaners or sweeping can spread contamination and should not be used for a mercury spill unless specifically designed for the purpose.

Refrigerants

Refrigerators and air-conditioning equipment may contain refrigerants and compressor oils. Refrigerants should be recovered with appropriate equipment rather than vented. Certain refrigerants have high global-warming potential or are controlled because of ozone depletion.

Technicians should be trained and certified as required by national rules. Recovered gas should be reclaimed, recycled, or destroyed through approved pathways.

Data Security

Computers, phones, storage devices, printers, and networking equipment may contain personal, financial, government, or corporate data. Businesses will not participate in formal take-back if they fear data leakage.

The company should provide documented data destruction using recognized standards. Devices can be securely erased when they will be reused or physically destroyed when reuse is not appropriate. Chain-of-custody records should identify serial numbers and destruction status. Staff handling sensitive assets need access controls and confidentiality agreements.

Environmental Controls

The facility should prevent releases to soil, water, and air. Stormwater should be kept separate from process contamination. Dust-generating operations require capture and filtration. Wastewater should not be discharged without characterization and treatment.

Environmental monitoring may include dust, lead, soil, wastewater, noise, and other parameters according to the permit and risk assessment. Results should be documented and shared with regulators.

Fire Prevention

E-waste facilities contain combustible plastics and batteries. Fire can release toxic smoke and contaminated runoff. Storage piles should be limited and separated, ignition sources controlled, and fire detection and suppression designed for the materials present.

Emergency planning should involve the local fire service. Site maps should identify battery areas, hazardous materials, water supplies, shutoffs, and evacuation routes. Firewater containment should be considered so that extinguishing water does not carry contaminants into drains and rivers.

Downstream Vendors

The company will not be able to recover every material itself. Circuit boards, batteries, lamps, precious-metal concentrates, and hazardous residues may require specialized treatment.

Downstream vendors should be audited for licenses, environmental controls, worker safety, and final destinations. Selling material to an intermediary without knowing where it goes can reproduce the same environmental problem. Contracts should prohibit unauthorized re-export or dumping.

Material Recovery

Economic value comes from copper, aluminum, steel, circuit boards, reusable components, and some plastics. Precious metals may be concentrated in boards, but extraction requires specialized metallurgical processes. The company should compare the economics and environmental controls of internal processing with sale to qualified refiners.

Recovered materials must meet buyer specifications for purity and contamination. Good sorting increases value and reduces rejection. Market prices are volatile, so the business should not depend on one commodity.

Repair and Refurbishment

Reuse can create more value and employment than immediate shredding when products have remaining life. Refurbishment requires diagnostic tools, spare parts, software licensing, quality testing, cleaning, and warranty procedures.

Products should be sold honestly with clear condition and battery health where relevant. Unsafe devices should not be returned to market. Recall databases and electrical-safety tests should be integrated into quality control.

Extended Producer Responsibility

Extended producer responsibility shifts part of end-of-life management from municipalities and informal collectors to producers and importers. Nigeria's e-waste framework has used EPR concepts, and formal recyclers can participate as service providers.

Producer-financed collection can stabilize revenue beyond commodity prices. Contracts should specify collection targets, reporting, public awareness, and verified treatment. Fees should not encourage recyclers to misreport weights.

Relationship With the Informal Sector

Informal collectors possess valuable knowledge and established collection networks. Simply banning them can remove livelihoods and drive activity underground. A formal company can register collectors, provide training, purchase materials at transparent prices, and create safer jobs.

Partnership should not legitimize hazardous processing. Burning, unsafe dismantling, and child labor must not be included in the supply chain. Social programs and skills training can support transition.

Child Labor

Children should not work in hazardous e-waste dismantling or processing. Exposure to lead and other toxic substances is particularly harmful to developing nervous systems.

Supplier and collector agreements should prohibit child labor in hazardous activities, and audits should verify compliance. Community programs can support school attendance and adult livelihood alternatives.

Community Engagement

Nearby communities should be consulted before the facility opens and during operation. They may have concerns about traffic, odor, smoke, jobs, land, water, and property values.

A grievance mechanism should allow complaints without retaliation and should document responses. Environmental data and emergency plans should be communicated in understandable forms.

Community engagement is not merely a public-relations exercise; local knowledge can identify risks overlooked by engineers.

Collection Logistics

Transport routes should minimize breakage and prevent loss. Vehicles need appropriate containers, load securement, and documentation. Hazardous fractions may be subject to additional transport rules.

Route optimization can reduce fuel and cost. Collection schedules should match storage capacity so that large volumes do not accumulate faster than the facility can process them.

Inventory and Traceability

Every incoming load should be weighed and classified. Business and government clients may need asset-level records. The system should record source, category, weight, disposition, and downstream destination.

Mass-balance reporting compares incoming and outgoing material. Large unexplained losses may indicate theft, misclassification, or emissions. Digital records support compliance and customer trust.

Permits and Regulatory Compliance

The company should obtain environmental, business, customs, waste, building, fire, labor, and other approvals required by Nigerian law. Import permits must be separated from domestic recycling permits.

Compliance obligations should be mapped before capital investment. A permit register should identify responsible staff, reporting dates, limits, and renewal requirements. Regulatory consultation can prevent designing a facility that cannot legally operate.

Basel Convention Compliance

The Basel Convention requires control over transboundary hazardous and other wastes. Beginning in 2025, amendments expanded control of e-waste, including prior informed consent among parties.

The exporter, importer, and relevant authorities must understand classification and documentation. The company should retain movement documents and confirmation of disposal or recovery. Any shipment suspected of illegal traffic should be reported and isolated.

Financial Model

Revenue may come from collection fees, producer contracts, data destruction, refurbishment, component sales, metals, plastics, and service contracts. Commodity revenue alone is risky because prices fluctuate.

Costs include land, construction, labor, energy, transport, equipment, environmental controls, permits, insurance, testing, personal protection, downstream treatment, and compliance. The original estimate of \$250,000 should not be accepted without a detailed engineering design and current quotations.

Capital Equipment

Equipment may include scales, forklifts, workbenches, hand tools, cable processors, balers, shredders, separators, ventilation, data destruction equipment, battery storage, refrigerant recovery tools, and fire systems.

Shredding should not be purchased simply because it appears modern. Manual disassembly may recover higher-value components and require less capital at moderate volume. Equipment selection should follow the material flow and safety analysis.

Staffing

The original staffing plan of ten to twenty people may be appropriate for a small pilot but cannot be assumed for a large facility. Roles may include management, environmental health and safety, technicians, repair specialists, dismantlers, logistics, sales, finance, security, and compliance.

Wages, training, health monitoring, and career pathways should be included in the budget. Formal recycling should create safer work than informal alternatives.

Insurance and Liability

The company may need property, general liability, environmental impairment, cyber, vehicle, worker injury, and professional coverage. Requirements depend on local markets and contracts.

Insurance does not replace controls. Insurers may require fire prevention, security, and documented environmental management before issuing coverage.

Quality Management

Procedures should define receiving, testing, dismantling, data destruction, storage, shipment, incident response, and recordkeeping. Internal audits verify whether the procedure is followed.

International management standards such as ISO 14001 for environment and ISO 45001 for occupational health and safety can provide structure, though certification should not be treated as proof that every operation is safe.

Performance Indicators

Useful measures include total collected, percentage reused, material recovery rate, hazardous fractions safely managed, injury rate, training completion, data-destruction errors, environmental incidents, customer complaints, and downstream verification.

High recycling volume should not be the only goal. A company can process more material while creating more harm. Safety and traceability should receive equal attention.

Market Development

Customers for refurbished devices may include schools, small businesses, households, and repair markets. Material buyers include foundries, refiners, plastics processors, and specialized recyclers.

Market research should verify demand, quality specifications, price history, and payment terms. Export of recovered materials may also require waste or product classification under international rules.

Public Education

Collection programs need public understanding. Campaigns can explain the environmental value of formal recycling, how personal data is protected, and where devices can be returned.

Messages should discourage open burning and unsafe home dismantling. Incentives such as discounts or small payments can be combined with education.

Pilot Phase

The safest route is a staged pilot using domestic business and institutional e-waste. The company can test collection, data destruction, repair, dismantling, downstream sales, and environmental controls at manageable volume.

Cross-border sourcing should be considered only after legal competence and regulatory relationships are established. A business should prove it can manage local material responsibly before expanding into complex international movements.

Risk Register

Major risks include illegal imports, commodity-price decline, fire, toxic exposure, data breach, theft, equipment failure, regulatory change, poor downstream treatment, and community opposition. Each risk should have controls, an owner, and monitoring.

Scenario planning should test what happens if imported material is refused, a battery fire closes the site, or the primary metals buyer stops purchasing. Financial reserves and alternate vendors improve resilience.

Implementation Timeline

The first phase should include regulatory consultation, market study, site assessment, engineering design, environmental review, and financing. The next phase covers construction, recruitment, equipment, vendor qualification, and training.

Commissioning should test processes at low volume before full operation. Environmental and safety performance should be reviewed before accepting more material.

Conclusion

A formal electronics-recovery business can reduce environmental harm and create employment if it prioritizes domestic collection, genuine reuse, controlled dismantling, worker safety, traceability, and verified downstream treatment. The original proposal correctly recognizes the value present in discarded electronics, but an operation based on importing “obsolete” European devices without strict legal review could reproduce the e-waste dumping problem it intends to solve.

Since 2025, Basel Convention controls on e-waste make transboundary classification, prior informed consent, and documentation especially important. The company should begin with a Nigerian collection and refurbishment network, integrate informal collectors safely, prohibit burning and child labor, protect data, and build a licensed facility with impermeable floors, ventilation, fire control, and secure hazardous storage. (U.S. Environmental Protection Agency, 2025) Profit should follow verified environmental performance rather than depend on exporting risk from one community to another.

References

Basel Convention Secretariat. *E-waste Amendments*, effective 1 January 2025.

Basel Convention Secretariat. *Technical Guidelines on Transboundary Movements of Electrical and Electronic Waste and Used Electrical and Electronic Equipment*.

Nigeria National Environmental Standards and Regulations Enforcement Agency. *National Environmental (Electrical/Electronic Sector) Regulations*.

International Labour Organization. *Decent Work in the Management of Electrical and Electronic Waste*.

World Health Organization. *Children and Digital Dumpsites: E-waste Exposure and Child Health*.

U.S. Environmental Protection Agency. *Sustainable Management of Electronics*.