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AOCG Memo No. 520-2021

## MEMORANDUM

**FOR :** ALL COLLECTION DISTRICTS/ SUB-PORTS  
ALL CHIEFS, EXPORT DIVISION OR EQUIVALENT UNIT  
ALL OTHERS CONCERNED

**FROM :** ATTY. EDWARD JAMES A. DY BUCO  
Deputy Commissioner, AOCG

**SUBJECT :** EXPORT OF LEAD-ACID BATTERIES NOT ALLOWED  
AND PROHIBITED

**DATE :** September 20, 2021

Forwarding the hereto attached letter-reply to Ms. Melody Ann Go, Kenkim's Recycling Junkshop dated August 31, 2021 from the Environmental Management Bureau, Department of Environment and Natural Resources (EMB-DENR) relative to the inquiry on the requirements and procedures to export Used Lead-Acid Batteries (ULABs) to India.

The EMB-DENR in the aforesaid letter, informs that ULABs are classified as hazardous wastes, with waste number D406, under Table 2.1 of DENR Administrative Order (DAO) No. 2013-22: *Revised Procedures and Standards for the Management of Hazardous Wastes (Revising DAO 2004-36)*. Likewise, it is one of the controlled wastes under the Basel Convention (BC) on the Transboundary Movement of Hazardous Wastes, to which the Philippines is a party and therefore is bound to abide by its obligations thereto.

The said Convention explicitly states that controlled wastes may only be exported for treatment or recycling in the absence of appropriate local technology/recycling facility. However, that is not true in the case of ULABs in the country.

Further, the Philippines does not have a viable commercial source of primary lead to supply its demand. Hence, the export of ULAB's is not allowed and prohibited but shall instead be sent to an EMB-DENR-registered Treatment, Storage, and disposal (TSD) facility for treatment/recycling and disposal.

For information and guidance.

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**ENVIRONMENTAL MANAGEMENT BUREAU**  
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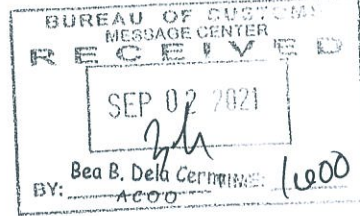
AOCG Memo No. 520-2021

August 31, 2021

**MS. MELODY ANN GO**  
**KENKIM'S RECYCLING JUNKSHOP**  
Special Block, San Antonio St.,  
Agdao, Davao City 8000  
E-mail: [melodydy7788@gmail.com](mailto:melodydy7788@gmail.com)



BOC-09-24287



Subject: **EXPORT OF USED LEAD-ACID BATTERIES IS NOT ALLOWED AND PROHIBITED**

Dear Ms. Go:

This has reference to your letter dated 17 August 2021 with IIS Transaction No. CO-2021 - 030036 inquiring on the requirements and procedures to export Used Lead-Acid Batteries (ULABs) to India.

Please be informed that ULABs are classified as hazardous wastes, with waste number D406, under Table 2.1 of DENR Administrative Order (DAO) No. 2013-22: *Revised Procedures and Standards for the Management of Hazardous Wastes (Revising DAO 2004-36)*. Likewise, it is one of the controlled wastes under the Basel Convention (BC) on the Transboundary Movement of Hazardous Wastes, to which the Philippines is a party and therefore is bound to abide by its obligations to the BC. The said Convention explicitly states that controlled wastes may only be exported for treatment OR recycling in the absence of appropriate local technology/recycling facility that is not true in the case of ULABs in the country. Moreover, the Philippines does not have a viable commercial source of primary lead to supply its demand. Hence, the export of ULABs is not allowed and prohibited. Instead, you are required to send the said waste to DENR-EMB-registered Treatment, Storage, and Disposal (TSD) facility for treatment/recycling and disposal.

Should you wish to view the list of DENR-EMB registered TSD facilities for D406, you may visit our website at [emb.gov.ph](http://emb.gov.ph) (Environmental Statistics – Hazardous Waste Management Data)

We hope we have addressed your concern.

Very truly yours,

**ENGR. WILLIAM P. CUÑADO**  
Director

cc: **The Commissioner**  
Bureau of Customs  
Port Area, Manila

