



9 November 2015

Water and Resource Efficiency Team  
Sustainability Policy  
Department of Environment, Land, Water and Planning  
Level 1, 8 Nicholson Street  
**East Melbourne VIC 3002**

**Managing e-waste in Victoria – submission from AREMA**

The Air-Conditioning and Refrigeration Equipment Manufacturers Association of Australia (AREMA) represents 30 companies that make and import air conditioning and refrigeration equipment in Australia. We are the leading industry association covering this sector.

AREMA would like to thank the Victorian Government for the opportunity to respond to its discussion paper on banning e-waste. Please accept our apologies for our late submission.

We believe it is imperative that there is effective engagement prior to the development of any policy or legislative response. Additionally, we would strongly encourage the Victorian Government to undertake this process by collecting data, and ensuring that industry is involved both in that process and in the analysis that follows.

We would point out that the Federal Government recently considered establishing a product stewardship scheme on domestic refrigerators and air conditioners.<sup>1</sup> The collection of data and analysis for that exercise demonstrated the problems caused by refrigeration and air conditioning equipment were significantly overstated and that the establishment of a product stewardship scheme was significantly cost ineffective. If Victoria chose to act alone, the costs would likely be much higher for a reduced benefit.

This outcome stems from the fact that this equipment retains significant value in relation to the metals and other valuable components in used equipment. The material is already recovered in the vast majority of cases.<sup>2</sup> Quite simply, the market works reasonably efficiently in recovering these resources – there is a reason most tips do not have significant numbers of air conditioners. Figure 4 in your document is not an accurate depiction of what happens to this e-waste.

---

<sup>1</sup> AREMA would recommend to the Victorian Government that it needs to be more specific than simply referring to air conditioners as these range from 20 kilograms to 200 or more tonnes.

<sup>2</sup> AREMA would also point out that most refrigerant gases used in air conditioners and in older refrigerators are caught within the activities of Refrigerant Reclaim Australia.



It is true that the remaining elements – shredder flock – does enter landfill. But this is close to a nil value product and does not represent significant resource wastage. Additionally, it is not clear what alternative there would be for shredder flock. Surely it would be inappropriate to create a product stewardship scheme when the valuable components had already been removed?

Thank you for your opportunity to provide comments. If you would like more information from AREMA please contact Dr Greg Picker our policy advisor (0403 741 715 or [gregpicker@me.com](mailto:gregpicker@me.com)).

A handwritten signature in black ink, appearing to read 'Mark Padwick', with a stylized flourish at the end.

**Mark Padwick**  
President, AREMA