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Waste and Resource Efficiency team
Sustainability Policy
Department of Environment, Land, Water and Planning
Level 1, 8 Nicholson Street
East Melbourne VIC 3002
wastepolicy@delwp.vic.gov.au

Dear Sir or Madam

VICTORIAN GOVERNMENT PROPOSAL TO BAN E-WASTE FROM LANDFILL

Australia and New Zealand Recycling Platform Limited (ANZRP) welcomes the opportunity to provide input to the Victorian Government's discussion paper, "Managing e-waste in Victoria – starting the conversation". ANZRP is very supportive of sound waste policy that drives community and environmental benefit and the efficient management of resources.

About ANZRP

ANZRP is the pre-eminent approved Co-regulatory Arrangement (CA) operating under the National Television and Computer Recycling Scheme (NTCRS), and fully funded by leading consumer electronics companies with iconic global brands.

Our vision, from the outset, has been to create a community which collects, processes and recycles electronic waste (e-waste) for responsible environmental outcomes.

ANZRP has been well known to Government since its early work with the AIA Environmental Special Interest Group, representing major IT brands; and with PSA, representing major TV brands. These groups worked with Government to play an integral role in the development of Product Stewardship and the NTCRS in Australia, including the creation of the Interim Industry Standard (IIS) for the collection, transportation, storage and recycling of e-waste – a foundation document for safe environmental outcomes. ANZRP then offered training for recyclers on the standard.

ANZRP set course in 2011 to deliver on the industry model and set the best practice benchmark. Some four years later our company, still run by a Board of industry representatives, continues to deliver the outcomes of the NTCRS in an environmentally sustainable manner, decisively consolidating our credentials as the leading CA. Our TechCollect program is now a firmly established and highly regarded player in the Australian e-waste recycling market.

Response to discussion paper

Further to our participation in the round table discussion held on 12 October we wish to outline some key factors based on our experience in the NTCRS for consideration:

Any proposal must be fully costed and funded and take account of capacity and capability considering alternatives; merely placing a ban on landfill does not solve the issue of the waste. While a waste levy system is in place in Victoria the full cost of landfills is not reflected

in the levy which means landfill is often the cheapest means of dealing with waste whereas at full cost recycling is likely to be a cheaper option. Charging the full cost of landfilling is a key part of encouraging better waste outcomes and should be considered in the review. Indeed banning e-waste to landfill without a clear funded solution will only drive up costs for local government by increasing illegal dumping.

There is a fundamental difference between e-waste and other waste streams as through recycling at least 90% of the resources within the products can be fully recovered and made available as a resource input for manufacture of new products which begs the question, is it a waste at all? The waste sector has been entrepreneurial in devising ways to turn waste into resources and is diverting product from landfill and achieving good environmental outcomes. Local government through fiscal constraints and the need to derive the best value for its constituents is often forced to choose the least-cost option and is, in some cases, landfilling e-waste rather than contributing to or covering the cost of recycling, this is a tragic waste of resource and a failure of economics.

We encourage the investment in accurate data to size and cost the impact of the proposal, this is key to reliable modelling and to sharing responsibility. Transparency is required across the industry so the full extent of e-waste can be determined and then monitored.

We are seeing unprecedented change in technology through miniaturisation, convergence and cloud technologies – the Internet of things. This is having a significant impact on the type, weight and volume of e-waste. Under the NTCRS we have seen a year-on-year decline in volume of e-waste available for collection. This can be attributed to the completion of the analogue to digital switch, and the value in the technology product which makes it readily saleable and reusable. In this regard business technology is often leased and at end of lease returned to be refurbished and is then released for a further period usually in a developing country; this means this product is not available for collection. Our estimates are that about 50% of the IT product (laptops, tablets and computers) imported into Australia are exported for legitimate reuse.

Australians are great recyclers, however we have a largely uneducated community when it comes to recycling electronic waste. The community holds the majority of the e-waste and as such is key to any program success; funds must be allocated for education and awareness building in the community and business, this should extend to responsible consumerism so end of life product decisions are made for old equipment when purchasing new/replacement equipment and questions asked of manufacturers/retailers about take-back and recycling options – this ensures those manufacturers doing the right thing are supported and sends clear messages to those that are not. Training the collection network on safe handling and to ensuring the recycling industry is operating to safe standards is another part of the ongoing education that is required. The role of enforcement by state government authorities cannot be underplayed, monitoring and enforcing workplace health and safety and responsible recycling will assist in eliminating the rogue recyclers.

Shared responsibility – we all have a responsibility for the products we consume, responsibility begins at the design phase and passes through all stages until the product is fully consumed and ready for recycling. This is the circular economy at work, an environmentally sound way that facilitates maximise resource use and minimise waste.

Responsible parties include manufacturers, logistics companies, retailers and distributors, governments, businesses, the community and the reuse/refurbishment and recycling sectors locally and overseas as much of the product recovered is shipped off-shore for final processing to recover the maximum level of resources – these off-shore facilities need to be

report fully on the recovery. Retailers need to play a role in both creating awareness of end-of-life recycling and in the collection and transportation of end-of-life product for recycling, they are a key player in successful overseas schemes.

Global experience shows when all parties work together effectively is when the best results are achieved, systems and networks take time to be established and improved, the NTCRS has learned many valuable lessons as has ZeroWaste SA in implementing arrangements, this learning will benefit Victoria.

Responsible e-waste recycling is costly; further as a very large country with a relatively small population, collection is costly. For a vibrant recycling industry there needs to be economies of scale that would drive investment in recycling technology and infrastructure which would in turn create more jobs and value in the Australian economy. We acknowledge and appreciate the grant funding support for recycling infrastructure investment by Sustainability Victoria. We suggest the product scope for e-waste needs to be more than TVs, computers and peripherals and printers. Certainly it is critical that whatever approach the Victorian government takes it must align and be consistent with the existing product stewardship programs and approach. We also believe that any new scheme begin with standards in place to ensure safe workplaces and sound environmental outcomes.

For e-waste collection to be efficient there needs to be standardisation and consolidation. The Australian standard requires that e-waste is placed on a hard stand and kept undercover, this is not available at many Victorian councils. The government would be well placed to support funding such amenities to ensure safe and environmentally sound storage and collection of e-waste. A consistent "collection unit" would allow for efficient logistics and greater utilisation of logistics which means a lower carbon footprint and better outcomes for all.

Whatever the motive for proposal to ban e-waste from landfill and regardless of the definition of e-waste that is adopted, it is clear that we, as stewards, of our planet must do everything we can to preserve the finite resources we have and ensure we do the least damage to the environment so that future generations may benefit from these resources and be sustainable. Resource recovery from e-waste is not only more efficient than mining virgin material it is in most instances many times more cost-effective and has a lesser environmental impact to say nothing for the impact it may have if treated poorly at end of life.

ANZRP looks forward to contributing to the process in the hope it delivers mutually beneficial outcomes for all stakeholders and ensures the long term sustainability of product stewardship in Australia.

Yours faithfully



Carmel Dollisson
CEO