

Submission on the Discussion Paper “Managing e-waste in Victoria: Starting the Conversation”

BY

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The Wealth from Waste Cluster is a partner-funded research collaboration (2013-2016) between CSIRO and the University of Queensland, UTS, Monash, Yale, and Swinburne Universities that aims to identify viable options for recycling metals in Australia (see www.wealthfromwaste.net). This submission is authored by Wealth from Waste Cluster researchers at Monash University and the University of Queensland. This submission represents the views of the authors as researchers in the field of e-waste recycling on the content of the Discussion Paper “Managing e-waste in Victoria: Starting the Conversation”.

We welcome the Discussion Paper “Managing e-waste in Victoria: Starting the Conversation”. We believe that, if designed and managed well, an e-waste ban from landfills in Victoria could be an important step forward to achieving a responsible and more efficient collection and recycling system for the end-of-life products (EoL) in Australia to meet society’s expectations for a greener and more circular economy.

Based on discussions with some of the scheme participants and a wide range of other stakeholders during the first eighteen months of our project, we firmly believe that implementation of a landfill ban needs to be carefully considered and planned to ensure that both short-term and long-term adverse impacts are minimized or avoided. Further, we are firmly of the view that optimal management of the e-waste problem requires a far more holistic and comprehensive set of measures, in addition to a landfill ban. There is rapidly developing track record of innovative regulatory measures addressing e-waste in Europe and the United States. Victoria should aspire to move directly to best practice, rather introduce an incremental process.

We suggest the following five areas for particular consideration below:

1. The necessary infrastructure and accompanying education campaigns needs to be implemented and established in advance of the ban.

Placing an e-waste ban on landfills will oblige individuals, organisations and businesses to find appropriate alternative ways to dispose of their e-waste. Consequently, investment is required to set up the necessary infrastructure and organisational capacity prior to the ban. This may include increasing the number of collection and drop-off points, ensuring that e-waste recycling businesses and social enterprises have the capacity and space to handle and process increased volumes, and establishing effective strategies and approaches to divert e-waste that may end up at transfer stations and landfills. This will ensure that the logistics of e-waste recycling are well-organized, efficient and operational at the time the ban is implemented.

A widespread marketing and education campaign will be needed to notify the public of the changes and inform them of the alternative disposal options available to them. This will help pre-empt and alleviate any confusion and frustration, and minimize e-waste disposed of through general waste routes. Particular attention may be required for small household appliances, tools and toys (e.g. electric toys, electric toothbrushes, etc.) which are usually the categories with the smallest collection rates. Any campaign will need to be a planned and coordinated effort between a range of stakeholders, including the Victorian Government, Local Government Authorities (LGAs), e-waste

recycling businesses, social enterprises involved in e-waste recycling, and retail outlets serving as collection points. Disseminating information clearly and consistently in advance of the landfill ban will ensure that the transition is as smooth as possible.

Both of these considerations are particularly important for communities which currently have relatively less convenient access to e-waste recycling collection points (e.g. in rural LGAs), as more planning and groundwork is required to ensure they are not disadvantaged.

2. A landfill ban may increase in incidence of Illegal dumping, which negatively impacts charity organisations, social enterprises and local councils disproportionately

A lack of convenient access to e-waste collections systems may increase the likelihood of illegal dumping. This was evident with the introduction of the landfill levy, after which an increased incidence of illegal dumping was observed, particularly around local councils and social enterprise and charity retail outlets. Consequently, these organisations will be burdened with the costs of finding appropriate means of disposing the dumped goods.

This issue can be partially addressed by ensuring that the necessary collections systems infrastructure is in place and that the public is well-formed, so that individuals have readily accessible convenient ways to dispose of e-waste in environmentally and social responsible ways.

3. A landfill ban will increase opportunities and expand the e-waste recycling industry, but may also lead to more competition and conflict between the diverse actors involved in this space.

Introducing an e-waste ban on landfills will lead to increased volumes and opportunities for the e-waste recycling industry, and will likely expand the existing landscape of businesses and organisations active in this space. These actors range from large-scale commercial businesses to not-for-profit social enterprises focussed on providing employment opportunities. We wish to flag that the growth in e-waste recycling that will be galvanized by the introduction of a landfill ban will lead to increased competitive tension between these different types of organisations that vary in scope, size, capacity, motivations and value contributions. This was observed with the introduction of the National Television and Computer Recycling Scheme (NCRS), established under the *Product Stewardship Act 2011*, during which supply volatility and resulting competitive tension negatively impacted several businesses and social enterprise organizations involved in e-waste recycling. It is important to remain cognizant of this potential conflict, and that a broader suite of benefits – economic, environmental and social – is considered in valuing the stimulated growth of the e-waste recycling industry.

4. Legislative acknowledgment of product reuse opportunities and routes.

The reuse of end-of-life products is in many cases a preferred option for minimizing the environmental impacts over product life cycle, if compared with immediate recycling. A significant part of the reuse sector is still informal, and an additional investigation may be required to assess whether the regulatory intervention may contribute to a wider, safer and more responsible way of product reuse, as well as improve its accountability both domestically and internationally.

5. A more rigorous State-based legislative framework to support best practice in recycling.

The Discussion Paper at p 14 seeks suggestions about the principles that should be considered in developing an e-waste approach. We suggest that extended producer responsibility, user pays, and polluter pays should be paramount considerations. It seems surprising to us that the Commonwealth Government has taken the lead in this field through the NCRS, an industry based collection arrangement which has cut across a wide range of pre-existing arrangements operated by the local government, social enterprises and private sector under broader State and Territory laws. Whilst there is a strong case for uniformity in this field we believe that the State of Victoria should take the

initiative to establish a far more holistic and comprehensive set of measures, in addition to a landfill ban (and landfill levies). The NCTRS is at best a partial scheme, being limited to certain types of e-waste and specified recycling targets, and largely driven by industry players. There needs to be a much more comprehensive State-based legislative framework to satisfy the needs of all stakeholders, and in particular to ensure (i) that e-waste is not illegally dumped and (ii) that all e-waste unsuitable for re-use is authentically recycled, in an environmentally responsible manner. A more comprehensive Victorian scheme would require an appropriate funding model to achieve these goals, and several relevant precedents from overseas can be considered (e.g. the Californian Advance Recovery Fee which requires financial contributions from consumers, and the New York scheme which imposes collection recycling costs upon manufacturers).

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