Managing E-Waste in Victoria

AIIA supports an in principle e-waste landfill ban provided appropriate support mechanisms are in place

AIIA appreciates the opportunity to comment on this important issue.

The Australian Information Industry Association (AIIA) is the peak national body representing Australia's information, communications and technology (ICT) industry.   Since establishing 35 years ago, the AIIA has pursued activities aimed to stimulate and grow the ICT industry, to create a favourable business environment for our members and to contribute to the economic imperatives of our nation. Our goal is to "create a world class information, communications and technology industry delivering productivity, innovation and leadership for Australia".

While we support the broad concept of an e-waste landfill ban, we consider there are a number of issues to get right in order to achieve the scheme's objectives, while avoiding market distortions witnessed in similar schemes. We outline these issues below and provide recommendations on how government might address them.

Current recycling infrastructure must be able to meet increased demand especially around difficult waste streams such as CRT, lamps and bio-waste

- A ban on e-waste in landfills means e-waste will be diverted elsewhere - to recycling under best-case scenario or illegal dumping and inappropriate storage under worst-case scenarios.

- Presuming best-case scenario - it is important to understand the projected levels of e-waste to be recycled and ensure that current recycling infrastructure will be sufficient to meet increased demand.

    o AIIA notes that the discussion paper does not provide detail on current levels of e-waste in Victorian landfills nor projections on the recycling levels expected once the ban comes into place. This information is critical to gauge likely impacts on the recycling sector and determining whether further capacity will be required.

    o AIIA strongly recommends this information be made available for industry consultation before a final decision is made.

Funding for local governments to recycle e-waste above NTCRS targets

- Industry must provide 50 per cent of television and computer recycling under the National Television and Computer Recycling Scheme (NTCRS).

- With only 50 per cent of available e-waste accounted for under the NTCRS and the ban applying to e-waste that is not currently covered by the scheme, it will be necessary to identify responsibility and funding for the additional waste.

- Clear strategies and allocation of responsibility on how to manage any over supply of recycling material must be developed upfront to avoid the boom/bust cycle in the recycling sector, which was highlighted as a significant problem in the NTCRS operational review earlier this year.

- An option for funding considerations might be to expand the NTCRS to full scope – that is, to include any product with a plug and battery as part of the recycling scheme. This will mean economies of scale for industry to recycle more cost effectively and a benefit to Government as more items are being recycled.

o   As the NTCRS takes a shared responsibility approach, careful consideration will need to be given to industry targets and clear understanding that local/state governments must also fund recycling outside of the scheme should overflows occur.

Mandatory minimum standards to ensure proper recycling and resource recovery

- AIIA strongly supports minimum standards for recycling and resource recovery.

- Our members' experience in auditing e-waste recyclers is that within the industry there is generally poor understanding of the hazards in recycling e-waste and of the recyclers' health and safety and environmental obligations.

    o   In implementing this Scheme the state health and safety and environmental regulators should be engaged in the process to conduct education programs for collectors and recyclers followed by enforcement campaigns. The leaded glass stockpile in NSW that was eventually funded by the NSW taxpayers was a direct result of people not understanding or not complying with local regulations. If you have not done so already it would be useful to consult with NSW EPA on this subject.

- To ensure effective implementation, training and information sessions are required to support both recyclers and auditors.

    o   AIIA is prepared to assist by providing content for the training but we believe that it should be centrally coordinated by Government.

    o   Government might also consider funding the development of an e-learning package that will educate stakeholders including collection locations, recyclers, industry and auditors about the hazards of e-waste, the legal requirements, traceability expectations and the controls that should be in place to meet the standards.

Education of the public

- Any e-waste landfill ban must be well publicised and a full education campaign will be needed to ensure its effectiveness and compliance.

    o   A recently released EU study found that only a third of Europe's e-waste goes where it should. This is a multifactor and complex problem, however ensuring that consumers and businesses are aware of their obligations and disposal locations is the first and one of the most important steps for successful implementation.

Enforcement and evaluation including criteria for success

- Enforcement and evaluation of any program is important for good governance.

- An important consideration for enforcement is control of illegal dumping, the transport of waste interstate or overseas and the movement of banned waste into a less preferable (by some measure such as the waste hierarchy) form of treatment.

- An important consideration for evaluation is looking at re-direction flows that might have resulted from the ban and its impact on overall effectiveness of the ban.

    o   AIIA strongly recommends Government develop clear criteria for success supported by agreed milestones and metrics to monitor progress and report outcomes.