



WASTE INDUSTRY ALLIANCE
Victoria

SUBMISSION

1 November 2015

TO: Waste and Resource Efficiency Team
Department of Environment, Land, Water and Planning
PO Box 500
East Melbourne VIC 3002

RE: Managing e-waste in Victoria, Starting the Conversation

Delivery via email to: wastepolicy@delwp.vic.gov.au

The Waste Industry Alliance Victoria (WIA) welcomes the opportunity to provide a submission to the Department of Environment, Land, Water and Planning to inform the design of an approach to banning e-waste from landfill in Victoria.

INTRODUCTION

The WIA represents five of the largest waste management companies in Victoria – Hanson Landfill Services, KS Environmental, SUEZ, Transpacific Industries and Veolia Environmental Services.

These companies are diverse businesses that work across the complete waste and resource recovery sector with interests in waste collection and transport; transfer stations and waste separation operations; waste recovery, reuse and composting facilities; landfill and disposal sites; and waste to energy projects.

The core purpose of the WIA is to advocate the benefits to the economy and the community of a high performing waste industry to the State Government of Victoria through:

- promoting increased private sector investment in the waste and resource recovery industry
- appropriate and consistent regulation and enforcement
- support for increased growth and jobs in the waste and resource recovery industry
- collaboration on improved environmental and community outcomes associated with the waste and resource recovery industry; and
- a commitment to best practice.

SUBMISSION

The WIA offers the following comments relevant to the Discussion Paper *Managing e-waste in Victoria, Starting the conversation* (Discussion Paper).

What is e-waste?

- WIA concurs with the definition of 'e-waste' proposed for Victoria as described in the Discussion Paper¹. However, unless the definition is well promoted to the community and their understanding of the term enhanced, the word 'e-waste' can be misleading. Anecdotal evidence suggests most people consider e-waste to be electronic equipment such as mobile

¹ Department of Environment, Land, Water and Planning, (August 2015) *Managing e-waste in Victoria, Starting the conversation*, p4

phones and computers. Other electrical or battery operated equipment, some with a higher harm risk than electronic equipment, are generally excluded from this definition.

- Category examples will need to be fully explored and listed to support correct sorting of waste, identification of correct recycling process and collection or disposal location.

What are we already doing to manage e-waste?

- E-waste collection and disposal is currently managed primarily by the waste and resource recovery industry. This circumstance should be acknowledged and considered by all sectors - government, industry and the community. Consequently, consultation with the waste and resource recovery industry is essential.
- Landfill operators manage receipt and disposal of e-waste under current EPA Victoria and State Government legislation ensuring the correct disposal and treatment.
- Items placed by the community in the 250 litre local council recycling bin are sorted and disposed of at appropriate facilities by contracted licensed recycling operators. This service is considered 'free' by the community.
- Hard waste collection services, offered by local government and supported by the recycling industry, often carry restrictions on volume, item size and health risk or hazard. This service is also considered by the community as a 'free' service.
- Recycling drop off centres accept waste in categories currently prescribed by EPA Victoria and State Government legislation. This service generally attracts a fee and requires community members to dispose of their waste in appropriate bins.
- Recycling services, paid for by the company, are offered by some businesses to consumers. For example, the National Television and Computer Recycling Scheme was established in 2011 to provide Australian householders and small business with access to industry-funded collection and recycling services for televisions and computers². Again, the community's perception is that this service is offered for 'free'.

What are the problems with e-waste?

- The impact of hazardous materials contained within electronic products disposed to landfill and recycling centres is a greater risk to workers than to the community generally. Regulations to manage all categories of e-waste, supported by an audit process, will be required to allow staff to confidently handle waste and recovered resources.
- As technology rapidly evolves, the life-span of products decreases and the cost declines. A more demanding market is also driving expeditious response to pressure electronic designers and manufacturers for improved, faster technology. Managing the needs for the disposal and treatment of this dynamic market will require the development of proactive relationships between government, manufacturers and the waste and resource recovery industry.
- Consideration needs to be given to the management and correct disposal of older e-waste in non-BEPM landfills.
- E-waste currently represents 1% of the total waste and resource recovery industry volumes and, in most cases, disposal of the materials does not present a high risk to the community.

² www.environment.gov.au/protection/national-waste-policy/television-and-computer-recycling-scheme, sourced 20.10.15

Consequently, there has been little influence to change the current process for the disposal of e-waste.

- While all levels of government recognise the growing need for the correct management of e-waste disposal and resource recovery, WIA believes that, to date, there has been a lack of industry consultation relevant to the development of appropriate processes.
- The lack of community awareness and understanding of the term 'e-waste', e-waste categories and options available for disposal of e-waste is a major impediment to successfully managing this waste.
- WIA believes there are a range of negative impacts that need to be considered in the development of an e-waste strategy. These include:
 - Increased costs to industry, the community and local government to collect, dispose and recover resources from e-waste
 - Overcoming community perceptions that collection and disposal of e-waste is currently a free service and will now be subject to cost
 - The potential for an increase in littering and illegal dumping
 - The potential for stockpiling
 - The potential for development of 'informal' recycling operators
 - Unstable commodity prices have the potential to severely impact a recycling operator
 - Flooded market causing commodity prices to decline and current businesses to be impacted
 - Potential of increase in illegal exports
 - Potential for fee / levy avoidance with interstate transport of e-waste for disposal at lower cost
 - The unintended consequence of landfill operators being held accountable and penalised at the end of the supply chain
 - EPA Victoria currently lacks the expertise and resources to enforce compliance.WIA is keen to discuss with government as to how these impacts can be positively managed.

What can we achieve by banning e-waste?

- WIA believes that, if planned strategically, a range of positive outcomes banning e-waste to landfill are achievable. These include:
 - Increased community awareness of waste and resource recovery options and practices; and increased participation in programs
 - Increased resource recovery
 - Removal of hazardous wastes from landfill
 - Improved resource recovery technology
 - Potential for industry investment
 - Potential for increased jobs
 - Potential for improved export markets

Designing the approach

- WIA considers it essential that, in the development of an e-waste strategy, the waste and resource recovery industry is consulted to provide State Government with greater understanding of the availability of current and future sites and facilities; potential for updating infrastructure and processes to meet requirements and future investment strategies.
- Establishing e-waste criteria will require:
 - Clear explanations of the categories and examples of items within each category
 - The definition of 'e-waste' needs to be clearly communicated to ensure understanding of categories and items

- Consultation with the waste and resource recovery industry to clearly understand what is recoverable, what can be reused, what processes are currently available and what infrastructure is required to meet projected needs
 - Identification of supply chain and end-markets to be included as an element of the overall planning strategy
 - The ability to be proactive and to forecast need for e-waste collection and disposal, for example, the introduction of Light Emitting Diode (LED) globes several years ago directs the current requirement to receive these items as e-waste.
- Implementation and ongoing management of an e-waste strategy will require the development of legislative regulations and compliance enforcement. WIA does not believe EPA Victoria is currently capable or resourced to manage the requirements of a strategic e-waste plan.
 - Unintended consequences of banning e-waste to landfill need to be considered. For example, fining licensed landfill operators for the involuntary disposal of e-waste.
 - WIA agrees a well-timed implementation of a landfill ban is crucial. As indicated in the Discussion Paper, certain aspects of the development phase are going to require careful consideration and planning. These include:
 - Assessment and identification of current licensed facilities
 - Assessment and identification of technology and processes to service e-waste resource recovery requirements
 - Integration of strategy with *Statewide Resource and Recovery Infrastructure Plan*
 - Identification and fostering of end-markets
 - Development of commodity pricing framework to offer security to industry investors
 - Well-resourced education strategy, including training, development of communication materials and information sessions
 - WIA supports a phased implementation of both categories and regions. A strategic implementation plan requires the consideration of available infrastructure, processes and industry capability. Consideration should also be given to phasing potential harm or risk, with high risk items included in the first phase of any regional implementation plan.
 - To successfully implement the e-waste strategy, WIA believes a broad well-resourced education strategy is required to provide greater understanding of why the landfill ban is necessary, outlining the environment, health and future harm risks. This will need to be supported by comprehensive information campaigns clearly explaining the e-waste definition, the categories and category item examples. Without the support of the community, the ability to successfully implement the strategy will be impacted.
 - Successful implementation and ongoing management of an e-waste strategy based on a ban to landfill will require substantial industry investment. In light of the potential negative impacts outlined above (page 3), including rapidly evolving technology market, fluctuating commodity prices and lack of assured end markets, the State Government will need to consider security for industry investment in facilities, processes, technology and resources to meet the needs of the e-waste strategic plan.

WIA looks forward to working with the State Government to achieve these recommendations.

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