29/10/15

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

Re: E-Waste Submission

1. Definition of e-waste
Brimbank agrees that the provided definition of e-waste is clear, unambiguous and encompassing of those materials concerned.

2. Are the proposed categories of e-waste clear to you? If not, can you suggest any specific changes to the existing categories, or another method of categorisation?
The categories of e-waste are clear and well-defined. No specific changes are suggested.

3. What specific issues do you believe we need to address by banning e-waste from landfill?
The specific issues that need to be addressed include:

- Increasing volumes of e-waste being sent to landfill and the general sentiment of disposability of e-waste;
- To address the environmental and human health concerns of e-waste in landfills including soil and groundwater contamination;
- To address issues around resource depletion of those goods sent to landfill that are lost forever.

4. What do you see are current and future impacts of e-waste on the environment or human health? Can you provide examples?
Brimbank agrees with those current and future impacts identified in the discussion paper. They include contamination issues associated with landfills; greenhouse gas emissions associated with the production of electronic equipment; and resource depletion associated with e-waste goods sent to landfill.

5. What do you see as potential impacts (both positive and negative) from recovering e-waste?
The potential positive and negative impacts include:

Positive:

- reduced waste being sent to landfill and associated environmental and health impacts;
- reduced resource depletion and opportunity for resource recovery;
- reinforced messaging about the need to recycle and reduced sentiment of disposability of e-waste.

Negative:

- limited capacity (drop off centres) to manage the increased amount of banned material;
- increased dumped rubbish as a result of restricting the disposal of e-waste at landfill;
- limited focus on lifecycle responsibility of products. Need to increase the responsibility for those that are involved in producing, selling, using the products, the emphasis still on those collecting the discarded products being responsible for the disposal/processing costs;
- recycled e-waste volumes to date have been irregular and uncertain, which has a ripple effect on investment in the industry.

6. Do you believe there are particular reasons for not recovering e-waste?
The reasons for not recovering e-waste include the significant costs to Council and resourcing requirements of operating an e-waste recovery centre. At a manufacturing level, there is concern that recovered e-waste is more expensive to use than raw materials, and as such there is limited demand for recovered waste.

7. Do you believe there are other issues with the e-waste recycling market, or with specific stages of the e-waste recycling market?
As identified by the Discussion paper, there are concerns with instability in the broader e-waste industry, with unstable volumes of e-waste resulting in an absence of investment in e-waste recycling and a need for new processing technologies to be realised.

8. Are you aware of other barriers to achieving a sustainable e-waste recycling market?
As discussed above there still needs to be a greater commitment with those involved in producing, selling and using the products. The emphasis is still on those collecting the discarded products being responsible for the disposal/processing costs**.**

9. Do you think e-waste and its components are undervalued in Australia?
Brimbank does believe that e-waste and its components are undervalued as an economic resource and undervalued in terms of their environmental impact once disposed. This situation, however, is due to those concerns mentioned prior: that the cost of e-waste recycling is significant and that the cost of reusing reclaimed e-waste can be more than raw materials.

10. Do you believe that banning e-waste from landfill will achieve these outcomes?
Banning e-waste from landfill will achieve a number of positive environmental, social and economic outcomes. Broader community awareness on e-waste and its impacts will benefit, especially if a broader education and awareness program is delivered by the State Government to compliment this initiative. Banning e-waste will also provide needed certainty to the recycling industry, with reliable e-waste volumes likely to drive down recovery costs and investment in better recycling technologies.

11. Are there other outcomes you believe the commitment should, or is likely to, achieve?
This initiative will likely compliment broader programs aimed at raising environmental awareness on the impacts of goods sent to landfill and the need to reduce, reuse and recycle.

12. What criteria do you think will be useful to help us determine how the different types of e-waste are managed in Victoria?
The Federal Government has legislation already in place. This includes the Product Stewardship Act 2011, Product Stewardship (Televisions and Computers) Regulations 2011 which came into effect on 8 November 2011 and support a co-regulatory recycling scheme for televisions, computers, printers and computer products. The legislation and scheme have already progressed how different types of e-waste are managed across the nation and in Victoria. It would be beneficial to build upon the existing structure than reinvent another system and confuse and potentially destabilise something that is still trying to establish itself in the market place.

13. Do you think some regions will require more time to prepare for a landfill ban than others?
Yes. A needs analysis and viability assessment will need to be undertaken to determine the number of processing/disposal centres already in place and the number that would be required to receive the products the ban will create. Capacity issues and costs will need to be fully determined. There may be opportunities to provide funding through the generated through the landfill levy (currently at $400 million in reserve) to establish new and upgrade existing centres to manage the increased volumes that will be generated through the ban.

14. What changes, if any, will need to occur in your region before e-waste can be banned from landfill and managed appropriately?
Providing adequate number of facilities to process the products and structures/funding to sustain the market. Currently the number of facilities to receive and process the products in limited and the funding available to sustain the market is insufficient. Council's that have previously signed up to agreements with processing companies supported by the

Federal Government co-regulatory recycling scheme for televisions, computers, printers and computer products and now being subject to increasing costs by the companies due to decreasing commitment by manufactures to support the voluntary initiative. Compulsory commitment will need to be in effect for manufacturers to take full responsibility to reinforce and sustain the market.

15. Do you think banning e-waste from landfill in Victoria will need to take a phased approach? If so, what do you think should be key considerations in determining how the phasing occurs?
Yes, please refer to Q13.

16. Do you believe there are other principles that must be considered in the development of Victoria's approach to ban e-waste from landfill?
In a broad sense the principle of intergenerational equity should apply, to ensure future generations benefit from this initiative by having access to the same opportunities (and resources) that previous generations have. Also refer to response to Q13, 14 & 15.

17. What other tools do you think the government should consider when designing Victoria's approach to banning e-waste from landfill?

- Concerted and holistic state-wide education campaign to support the change;
- Appropriate processing and disposal facilities to implement the change;
- Defined responsibilities to those involved in producing, selling, using and disposing of products.

18. How do you think community could be supported to ensure e-waste continues to be recovered and recycled?
Community support can be provided via:

- free drop-offs
- ease of access to recycle centres
- information/education on what can be recycled.

19. What unintended consequences do you think the landfill ban could cause? Please provide as much detail as possible and refer to any research or case studies that might help to support your feedback.
The main unintended consequences are as follows:

- An increase in the amount of dumped rubbish that will be generated due to a lack of and conveniently located disposal facilities for the community;
- Cost shifting to local government If a separate kerbside collection is introduced as opposed to a drop off facility;
- An increase in Council rates to account for the processing of the banned products, which will be another complication for local government with the introduction 'rate capping' by the State.

20. How do you think the design of the approach to banning e-waste could be designed to mitigate these unintended consequences?

Produce a fully informed strategic plan outline the staged implementation, for the collection, collection, receipt and processing of the material. The plan should include the reinforcement of legislation to clearly define responsibilities for all the costs. Legislation should focus on a life cycle approach for the products clearly define the responsibilities of producers, retailers and purchasers of the products.

21. Are you aware of any policy developments or reviews, both interstate and nationally, that may be useful in the design and implementation of the e-waste commitment?

The Product Stewardship Act 2011 (the Act) came into effect on 8 August 2011 and fulfils a key Australian Government commitment under the National Waste Policy. The Act seeks to address the environmental, health and safety impacts of products. The implementation of the Act will help reduce hazardous substances in products and in waste, avoid and reduce waste, and increase recycling and resource recovery. The Act provides a framework for mandatory, co-regulatory and voluntary product stewardship.

The Product Stewardship (Televisions and Computers) Regulations 2011 (the Regulations) came into effect on 8 November 2011 and support a co-regulatory recycling scheme for televisions, computers, printers and computer products.