

Managing e-waste in Victoria – starting the conversation

Submission coversheet

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- By email to: wastepolicy@delwp.vic.gov.au
- By post to: Waste and Resource Recovery team
Department of Environment, Land, Water & Planning
PO Box 500
Melbourne VIC 8002

Fields marked with an asterisk (*) are mandatory.

Contact Details

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Q 1: Is the proposed definition of e-waste clear to you?

This paper's definition of e-waste is clear and in line with the definition and categorisation as used internationally.

However the definition (and focus of this paper) is out of alignment with the federal definition implemented via the NTCRS.

Whilst it is true that the Product Stewardship ACT shares this broader definition, the NTCRS – as the first mechanism to enact the legislation – has a much defined focus.

Any proposal looking at the introduction of a ban of “e-waste” to landfill must consider the parallel schemes that assist in the diversion of waste.

Q 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?

Currently there are no state wide schemes for the collection or diversion of ‘other’ e-waste items and only ad-hoc collection occurs supported by the scrap metal market.

Good data exists on the generation, collection and historical recycling of e-waste from specific product categories. This data was available with the clear and coordinated assistance from industry organisations like the AIIA and from programs such as BYTEBACK.

This data formed a very solid foundation for the development of the NTCRS

Very little data exists on the ‘other’ product categories proposed in this paper and the breadth, variety and lack of catchment makes this even more difficult.

Baselines will be difficult to establish and success (or failure) of the proposal will be difficult to measure.

Q 3: What specific issues do you believe we need to address by banning e-waste from landfill?

A broader question would be what the proposal SEEKS to address and what was the rationale for the initial proposal?

Other mechanisms – such as the development of a supported e-waste collection program could provide the same desired outcomes without requiring an e-waste ban

WASTE STREAMS

Due to the nature and breadth of the defined e-waste categories, the potential benefits and issues that can be addressed are exponentially broad.

A clear path forward would be the staged introduction of bans of specific streams based on the potential health and environmental impacts.

CRT glass is a massive percentage of the current waste stream and is a volumetric and costly stream to recycle. We are fortunate in Victoria to have the leading CRT recycler in the country (PGM in Dandenong) but the ONLY option for bona fide recycling of CRT glass remains in SA – (NYRSTAR). A ban on CRT glass into landfill is a logical and proportionately significant step forward – but only with supportive investment to increase processing capacity.

Other e-waste streams that could potentially come under a blanket ban – pose minimal risk to health and environment, no greater than many other C&D, C&I streams. Focus on these items would be disproportionate, difficult to measure and with negligible benefit.

MECHANICS OF COLLECTION, DIVERSION, PROCESSING

Victoria does have an established and evolving recycling sector however further capital expenditure is still required.

Transfer station, collection point and other drop off infrastructure would need to be developed and there is no surety that existing networks work well enough to deal with a greater breadth of product.

FUNDING

Who pays for the scheme?

State government funding is unsustainable

Return on commodity does not cover the cost of collection or processing and falls well short of dealing with cost negative items (batteries, CRT glass)

The NTCRS called to progressively alleviate the community of the costs and impact of e-waste and to transfer this cost and administration of recycling to the manufacturers and importers of this equipment (the 'liable' parties). This mechanism has taken years to develop and only came about by the cohesion, drive and investment of industry groups like the AIIA.

(Independent producer responsibility – recycling conducted 'in-house' by the IT industry also accounts for over 45% of the reported volume under the NTCRS – I am not aware of any IPR recycling from the broader e-waste sector)

The NTCRS also built upon successful precursor programs like BYTEBACK and mobile muster, no pilot programs exist for broader product codes..

No such industry group or cohesion exists across other product streams.

The issue of the 'free rider' will be a difficult one to control.

CIRCUMVENTION

One of the best strategies to deal with managing any proposal such as this is to examine in great truth and openness – how the laws can be flouted.

Does a ban create other issues elsewhere?

What is the profile of stockpiling in states with bans (like SA), what is the prevalence of transboundary movement of e-waste?

What is the proposed recovery rate – what is the definition of recycling and waste % of landfill fraction is acceptable?

HOW SUCCESS WOULD BE MEASURED

The NTCRS draws upon evolved and detailed data from many years of industry recycling and pilot programs.

The waste profile detailed under the proposal has not been measured to date in sufficient detail to define a successful growth profile.

Q 4: What do you see are current and future impacts of e-waste on the environment or human health?

Can you provide examples?

No response

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

Negative impacts of introduction of a scheme to collect e-waste in Victoria could be the dismantling of previously successful programs – even at a local level.

Unfortunately the comparison is made to the introduction of the NTCRS where successful pilot programs established under initiatives like BYTEBACK, were effectively dismantled with the offer of ‘free’ recycling by some CRA’s.

A positive impact should be the development of collection infrastructure and education that is infinitely applicable to a variety of waste streams in the future.

Q 6: Do you believe there are particular reasons for not recovering e-waste?

Based on the described categories proposed for this initiative, the commodity yield and return from each product is not sufficient to cover the recycling cost – let alone infrastructure or collection.

External funding and financial support would be required on an ongoing basis to support this initiative.

Earlier point regarding funding mechanisms remains one of the largest impediments to recovering e-waste as proposed.

Q 7: Do you believe there are other issues with the e-waste recycling market, or with specific stages of the e-waste recycling market?

Reduction in e-waste going to landfill may occur – but any proposed ban on e-waste will require a concurrent initiative to police unsavoury and illegal practices that prevail in Victoria (and other states in Australia)
Exports of non-functional e-waste, illegal dumping, storage, stockpiling, illegal landfilling, unsafe extraction methods, transboundary movement of e-waste and components are all avenues which unchecked would simply undermine the proposal.

Systemic departmental oversight must be developed and funded appropriately to support the proposal.

Q 8: Are you aware of other barriers to achieving a sustainable e-waste recycling market?

The initial years of the NTCRS saw an aggressive and short-sighted approach by many parties operating under the scheme that effectively dismantled many successful and ongoing programs for the management of e-waste.

The rush to provide ‘free’ services undercut systems that had a co-contribution from both industry and local government.

As a result many Councils and other State & local agencies ‘washed their hands’ of e-waste – as an industry and federal issue. The attitude and approach of local government is inconsistent and often confused.

This damage needs to be undone and local government once again educated as to their role and responsibility.

Transport remains a constant barrier – regional development is required

State capacity for the treatment of hazardous materials
Declining commodity pricing
Funding mechanism and process requires a shared responsibility

Q 9: Do you think e-waste and its components are undervalued in Australia?

The question regarding value in Australia is irrelevant.
E-Waste, the commodity derived from demanufacture and the prices manufacturers are prepared to contribute at the end of a products life are all subject to international influence.

Commodities are all traded internationally, regardless of the level of local 'value-adding'. Prices for steel, plastic and other metals are directly (and immediately) influenced by the situation in Asia.
Recent trade deals signed with several Asian partners further underlines this level of influence.
Any previous information regarding the viability of recycling some product categories may now be out of date
Metals prices have fallen to less than 50% of the value 18 months ago
Plastic has been cut by nearly 65% - and may see further decline as world oil prices are lowered.

Sadly in Australia currently, the market price set on recycling has been determined by the co-regulatory arrangements under the NTCRS.
The recycling fee paid by CRA's (under the NTCRS) is arbitrary and based on competition – NOT on the cost of recycling.

The structure of the NTCRS compels a competitive market and this is one of the determinant factors in a successful recycling scheme – margins fluctuate wildly and pricing can be arbitrary and at worst subsidised unsustainably to secure a contract.

Scrutiny of price, standardisation of pricing across all states and transparency of costs is critical in establishing a sustainable program.

Q 10: Do you believe that banning e-waste from landfill will achieve these outcomes?

An e-waste ban will increase COMMUNITY AWARENESS of the issue however the level of mistrust and confusion created under the NTCRS is something that would need to be overcome.

Education and awareness should still build upon the fundamental of resource efficiency and preservation of the waste hierarchy and raise a consistent simple and clear message about what to do and how to do it.

Education amongst the Council and local government sector is paramount – with many local governments still confused about the NTCRS.

RESOURCE RECOVERY is often cited as a fundamental driver for these programs – however the actualities of 'yield' obtained in material streams paint a very different picture.
On material recovery alone – the hypothesis does not stack up.

INFRASTRUCTURE must be grown to deal with increased and diverse variety of e-waste feedstock. The equation is circular with the increase volume stimulating development and the development requiring greater volumes for viability. Any proposal that directs a greater instream of product will benefit the recycling industry.

The TECHNOLOGY developments already evident – such as Blu-Box – illustrate the commitment of industry to respond to challenges.

Technology should be viewed as a solution to specific activities or waste issues, as a place will always remain for manual processing – even in part.

Investment should be encouraged – and resourced with the assistance of SV.

Manual process remains the lowest level of capex and the greatest level of employment.

Manual dismantling also achieves a higher return on commodity due to the preservation of components and materials.

A Balanced approach between technology and employment is required.

Transport and distance remains the greatest determining factor to recycling costs.

Development of regional capacity – even for part processing can greatly assist in addressing these costs.

Q 11: Are there other outcomes you believe the commitment should, or is likely to, achieved?

If the proposal sought to highlight the creation and sustainability of employment – especially in regional areas, the outcome would be more tangible and more readily measured.

Q 12: What criteria do you think will be useful to help us determine how the different types of e-waste are managed in Victoria?

- Location of maker
- Consumer profile
- Span of lifecycle
- Current disposition at end of life
- Capacity to 'capture' product
- Value at purchase
- Ease of demanufacture
- Value in commodity

Scrutiny of product lifecycle and value at 'end-of' life will assist in identifying the potential entrants into the waste stream and map the growth or decline of these product categories.

CRT televisions for example – represent a sizeable portion of the current e-waste profile but are declining rapidly. Infrastructure focussed on dealing with this product alone must have a very short pay-back period or be adaptable to other materials.

Logical examination of potential 'catchment points' for e-waste types – transfer stations are the 'end-of pipe', what options exist currently to intercept product types prior to the traditional disposal route.

Current export practice and value of e-waste – BASEL controls have a clear focus on hazardous waste – many of the proposed product codes would not be captured under BASEL restrictions. If a e-waste type retains a value – there may be legitimate export markets available that could be 'boosted' to assist in drawing on this waste stream.

Q 13: Do you think some regions will require more time to prepare for a landfill ban than others?

Victorian State Government has progressively supported and invested in the conversion of most metro 'landfills' to a transfer station model – this serves the diversion capacity of the sector and compliments any move toward a ban on specific products from landfill.

Regional capacity has a great part to play in the capture collection and processing of e-waste at point of source. Elimination of transport costs goes a long way to financially support an e-waste program

This localised solution provides regional employment, stimulates local economies

and can provide a valuable 'value-add' to the program.

Q 14: What changes, if any, will need to occur in your region before e-waste can be banned from landfill and managed appropriately?

Council awareness and engagement and increase local capacity with infrastructure support.

Regional landfill sites should be the primary focus and in this light a great deal of the attention should be placed on developing and supporting a regional capacity to handle e-waste in an alternate manner.

Q 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, product type, capacity to capture, capacity to recycle and existing infrastructure will be major factors.

"big ticket" items may be easier to target – for volume, visibility and measurable impact

Q 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?

Joint development projects should be sought and a clearly defined and accessible route s for equitable funding must be re-established.

Q 17: What other tools do you think the government should consider when designing Victoria's approach to banning e-waste from landfill? Be as specific as you can and consider details such as:

- Types of infrastructure that might be required
- Types of existing technologies available, both in Australia and overseas
- Opportunities for invention and development of new technologies
- Investment required
- Time required to implement
- Guidance that industry might need or want
- Information that community might need or want
- Level of government support and intervention
- ...and any other details that might be useful

Q 18: How do you think community could be supported to ensure e-waste continues to be recovered and recycled?

Unfortunately, one of the pitfalls of a co-regulated system such as the NTCRS is the lack of ownership of the information and message disseminated to the public. The success of any State based approach requires consistent clear communication. A peak body or organisation would be best placed to prepare and provide this information either directly – or for use by the various stakeholders.

Q 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.

Stockpiling, retention of product and illegal trade or disposal channels are all likely negative consequences of a landfill ban. Victoria has much to learn from a true assessment of the situation in SA.

Transboundary movement of e-waste is likely to occur – under many guises, where the problem can be ‘shifted’ – either into or out of the state.

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

Establish a schedule of products to be targeted and a timeframe for the introduction of each product.

Ensure education is consistent clear and thorough.

Stimulate a ‘pull through’ for the products, - a success here should negate the requirement for a ban.

Police the loopholes and devices by which unscrupulous ‘recyclers’ deal with e-waste.

Q 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?

No comment provided.

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