

1 November 2015

Waste and Resource Efficiency Team
Sustainability Policy
Department of Environment, Land, Water and Planning
Level 1, 8 Nicholson Street
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By email to: wastepolicy@delwp.vic.gov.au

Dear Sir/Madam

Managing e-waste in Victoria: Infoactiv submission

In summary, Infoactiv offers in-principle support for the concept of banning e-waste from landfill subject to its implementation being aligned with, and supported by other measures, tools and funding to ensure higher levels of electronics sustainability.

The Victorian Government is to be commended on this initiative. It must also accelerate its action on achieving a Circular Economy, and the 'ban' can fulfil one aspect of such activity.

The discussion paper - *Managing e-waste in Victoria – starting the conversation*, (herein the Discussion Paper), is a useful starting point to initiate and test ideas and proposals. Infoactiv commends the Victorian Government for promoting an inclusive approach available to all interested parties, including consumers of electrical and electronic products.

The structure and style of the paper makes it informative and educational, while also presenting a diverse range of questions and propositions for consideration.

The potential benefits outlined in the paper are diverse and compelling. From improved management of hazardous substances and increased resource recovery, through to new employment opportunities, and cleantech investment.

Critical considerations

Above all, the 'ban' must be considered and developed within a context that reflects how Victoria can contribute to, and achieve a Circular Economy. Without the focus on step-change system redesign, closed loops, design for environment and circular solutions, a simplistic landfill ban will remain an inferior solution to yesterday's waste avoidance and resource recovery imperatives.

The potential benefits of an e-waste landfill ban for Victoria are significant, but relevant parties, especially local councils and landfill managers, must directly inform its design and implementation.

It is vital that councils and landfill operators are not burdened by any prohibition that leaves them responsible as reluctant enforcers and implementers of a ban.

Regardless of the specific measures, the Victorian Government must adequately fund the design and implementation of a 'ban' to ensure its effective ongoing operation. To do otherwise, is to offer a hollow election promise without the necessary government resourcing.

Most importantly, clarity of purpose must underpin the process. A clear and unequivocal objective must drive the proposal in order to effectively engage relevant stakeholders and the community in general. While this will be informed and socialised through the consultation process, the need for The Hon Lisa Neville MP - Environment Minister, to 'sell' a compelling vision (and outcome) is vital if we are to see measurable benefits resulting from a ban.

As is generally accepted, electronics are a resource that should be collected, reused, repaired or recycled in larger volumes than is currently taking place. That obsolete televisions and computers continue to flood into landfills nationwide is a slight on Australia's resource recovery credentials.

The National Television and Computer Recycling Scheme (NCRS), now makes a solid contribution towards diverting e-waste from landfill, as do well developed programs such as MobileMuster and Cartridges 4 Planet Ark. Nonetheless, the electronics stewardship toolbox in Australia remains 'thin' and piecemeal. We can all do much more to improve and enhance the current range of e-waste management options. This includes manufacturers, brands, and all levels of government, waste management providers and consumers.

The rise of powerful and ubiquitous retail chains also needs much greater scrutiny. The presence of free-riding retailers who generally seem to think they are exempt from any meaningful electronics take-back effort in Australia does not help the rising level of e-waste worldwide. Simply placing collection bins in-store, funded by manufacturers and brands, is a superficial gesture by the majority of retailers. It is also a finely crafted piece of window-dressing that shines a light on PR-oriented CSR programs.

Key issues to consider as part of this process:

- clarity of purpose and intent to ensure clear environmental, social and economic benefits; and how a ban can help achieve a Circular Economy
- adequate financial resourcing by the Victorian Government, and the private sector where relevant
- ensuring that local councils benefit from a ban as opposed to being a reluctant enforcer or financial underwriter
- effective alignment and harmonisation with related instruments, programs and schemes, not excluding MobileMuster, NCRS, Cartridges 4 Planet Ark, Fluorocycle and various battery-related pilot initiatives.
- how a ban can trigger positive investment by government and industry, and help shape a more comprehensive solution to better managing unwanted electronics in Victoria and nationally
- establishing product scope (with clear justification) and defining types of e-waste to be banned and whether an incremental approach is desirable
- the critical importance of effective information and education to support the ban
- the specifics of how a ban will be monitored and enforced, and by who; including attention to its resourcing

Objectives and outcomes: short term and practical as well as strategic and long term

Infoactiv believes that a singular, short term practical solution to better managing e-waste in Victoria, is to fund the collection and recycling of television and computer waste that is not covered under the NCRS targets i.e. the gap or volume over and above the annual enforceable target. This would provide an immediate solution to many councils currently not supported by the NCRS, as well as stem the current flow of television and computer waste currently flooding into landfill.

In general, a landfill ban should cover the entire spectrum of e-waste as outlined in the Discussion paper in Figure 2. This should be phased and commence with televisions and computers, and then closely followed by television peripherals (i.e. DVD and VCR players, set-top boxes and hifi equipment), lighting equipment, large and small appliances, and all forms of batteries – both single use, rechargeable, noting that the majority of ULAB do not currently end up in landfill.

At a more strategic level, the Victorian Government should consider the comprehensive work being undertaken by WRAP in the UK on the issue of repair and reuse for electrical and electronic equipment. The environmental benefits of deferring the disposal of e-waste via reuse and extended product life are well accepted and should be an element in any Victorian Government program to minimise the quantity of e-waste going to landfill.

As mentioned earlier, the need to more directly involve retailers is also essential. Their participation must go beyond the provision of collection receptacles and demonstrate a stronger stewardship approach.

Retailers (like manufacturers), are significant commercial beneficiaries from the consumption of electronics, and their contribution to increasing reuse and recycling rates needs to be much higher and proportionate to the significant annual revenues they enjoy. Infoactiv would strongly recommend that specific programs be designed and implemented which focus on the retailer sector and e-waste, not unlike the progressive underway by Best-Buy in the USA.

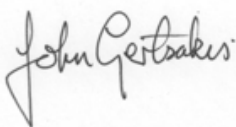
In summary, Infoactiv offers in-principle support for the concept of banning e-waste from landfill, subject to its implementation being aligned with other measures, tools and funding to ensure higher levels of electronics sustainability.

In particular, the Victorian Government must ensure adequate financial resourcing of the 'ban' or associated measures, and it must ensure that local councils do not become a reluctant enforcer or financial underwriter of prohibiting e-waste from landfills in Victoria.

The sharper the focus on e-waste prevention, the more significant the likely outcome across the product life cycle, and especially when electronics reach end-of-life. It is well known, that up to 70% of a product's environmental impact is determined at the design stage, and this provides a major point of intervention for industry and governments wishing to maximise waste avoidance and resource recovery opportunities. Simply focusing on 'waste' and recycling, would reflect a 1990s view of product sustainability, which increasingly fails to meet consumer and community expectations.

Please feel free to contact me directly on T (03) 8892 3929 if you have any questions or require additional information about the issues raised in this submission.

Yours sincerely



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