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To "wastepolicy@delwp.vic.gov.au"
<wastepolicy@delwp.vic.gov.au>

cc

bcc

Subject Managing E Waste in Victoria -
Submission

Dear DELWP and EPA policy makers

Thank you for the opportunity to submit our thoughts and support for Managing E Waste in Victoria and trust our comments and voice will be heard. While our company CMA Ecocycle is a processor and recycler of E Waste, Batteries, etc and are fully supportive of the "Starting the Conversation" - in regards to these waste we see Mercury Lighting Waste as something very different and something we can't wait till 2017 to address.

Our drive is to keep Mercury out of our landfills and our water ways and it is such a simple task which has become very complicated and confusing. There is no need or justification for this and it is such an easy fix to such a dangerous and poisonous waste – second behind Arsenic. Many 14001 companies as part of their charter recycle this Mercury bearing lighting waste but out of the 50 to 60 Million – 10,000 to 12,000 tonnes each year of this waste 95% ends up in landfill. That's an amazing amount of waste we allow, knowing to go to landfill without doing anything about it. EPA Victoria tell us that crushed Mercury Bearing Lighting Waste is a PIW (prescribed industrial waste) but this very same item and product if not crushed is ok and approved (indeed they tell you it legally can go to landfill) to go to waste and does not need to be recycled. So crushed it is a PIW but un-crushed it is ok to go to landfill. DOES THAT MAKE SENSE TO ANYONE ?

What is the first thing that happens to it when you throw a Fluorescent tube in a rubbish bin?, What is the first thing that happens when it is tipped into a waste truck? What is the first thing that happens when it is tipped out at a landfill site?. And what is the first thing that happens when a dozer runs over it at a landfill site? THEY GET CRUSHED. So as soon as you throw it into a waste bin to go to landfill it is crushed and is then a PIW, and therefor so is the whole of the bin it is in.

The whole theory is so flawed and who ever came up with this suggestion or idea just has not had the ability to take in or understand what actually or practically happens. Many senior staff at EPA are very frustrated by this but nothing has changed and it is making our industry impossible to manage and very confusing to clients, industry and the public. Recently over 100 tonne of lighting waste went to landfill in Victoria from a major waste company that had companies pay for recycling – they did it because they could. 100 tonne!

It could all be so easily fixed by just having a ban to landfill on all Lighting Waste and this will stop the confusion but more importantly stop Mercury heading into our environment. The lighting council support it, they promote it with a body they run called "Fluorocycle" but EPA Victoria say – no just dump them at the landfill. It can't wait till 2017 – we have to do something now. It is Mercury – not E Waste.

E Waste needs to be controlled and I agree the time lines you have set out for this work but not for Mercury bearing wastes.

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