

Managing e-waste in Victoria – starting the conversation:

Transpacific Industries Submission

Transpacific Industries Pty Ltd (TPI) is Australia's leading waste management solutions provider offering a network of Transfer Stations and Landfills to public and commercial customers. Within Victoria, TPI owns and operates 3 active landfills and 4 transfer stations plus greens processing facilities.

As transfer station owners, we rely on the public to source separate their recyclable materials such as eWaste (currently TV's, Computers), cardboard, batteries, metals etc. All remaining wastes are tipped into a push pit for direct transfer to our landfills. Presently the recovered wastes are placed in rented skip bins and freighted to nominated downstream suppliers. In implementing an eWaste ban, it would be expected that the eWaste would continue to be placed into one receptacle and the full load of mixed eWaste categories freighted to one company; no additional separation by category. In communicating a ban on eWaste to the public, an increase in the volumes will be received into our transfer stations. Currently it is a cost to TPI to rent the skip bins, freight to our nominated recycler and pay a per tonne fee to recycle this waste. The increase in volume once a ban is implemented will considerably increase TPI's handling costs. Will funding be provided to all collectors of eWaste if a ban is implemented?

With regards to operating and owning Landfills across Victoria, clearly defined guidelines, protocols and procedures must be implemented if introducing an eWaste ban. In particular, we would expect to know what the process is to handle eWaste if it was received in mixed loads by commercial customers, what assurances that no penalties are incurred by landfill owners and how any eWaste received into a landfill is to be handled and at whose cost?

Whilst the current recycling processes for eWaste still requires considerable manual disassembly and does not produce clean / pure streams of recovered materials, challenges may be faced with backyard recyclers setting up and stockpiles occurring. Alternative technologies will need consideration and government funding.

TPI will support the Victorian Government in an eWaste landfill ban however clarification on the above points is essential.

Following is our response to the questions posed in the Managing eWaste in Victoria, document.

What is eWaste?

1. Is the proposed definition of eWaste clear to you?

Yes the eWaste definition is clear however it has increased considerably since the NTCS was introduced with the understanding of eWaste to be TV's, Computers and peripherals. The definition is very broad.

2. Are the proposed categories of eWaste clear to you?

The categories are clear however again, very broad. If including all products with batteries, there is a potential for the volumes requiring recycling to be very significant. Under this definition, a simply vanity mirror which contains two batteries will be classified as eWaste. Most Victorians would not assume this is eWaste.

eWaste across the proposed categories will become a 'mixed waste stream' when collected at Transfer Stations and public collection points. This will not allow for accurate volume recovery rates by category/products. No collector will double handle and separate out the categories for auditing or recycling data.

What are the problems with eWaste?

3. What specific issues do you believe we need to address by banning eWaste from landfill?

Many eWaste recyclers use manual disassembly to recycle the current types of eWaste accepted into their facilities. These recyclers are also geared to take TVs and Computers not all other equipment with power cords and batteries. The broad definition of eWaste will considerably increase the volumes into these recyclers many of which may not have the capacity nor equipment designed to handle the new categories. If a ban is enforced, the ability for the current recyclers to accept such a large influx of volume may be overwhelming. Furthermore a number of smaller practices may pop up who cannot handle the volumes of eWaste; this may lead to stockpiling and/or illegal dumping.

If eWaste was to be disposed via landfill through a mixed load of general waste, who is responsible for the waste stream? Will the receiver (landfill) be penalised for eWaste delivered in loads? Landfill owners are unable to check contents in loads of waste until tipped onto the active landfill face; what precautions and/or procedures are the landfill owners expected to take to manage this?

4. What do you see are current and future impacts of eWaste on the environment or human health? Can you provide examples?

There is real potential for illegal dumping and stockpiling to occur from smaller inexperienced recyclers if not regulated closely. The raw components if not recycled to a pure/clean stream that will generate revenue may end up being stockpiled, dumped or sent to landfill. The impact to the environment if not regulated properly has the potential to become another tyre issue with stockpiles stored in warehouses or paddocks across Victoria.

5. What do you see as potential impact (both positive and negative) from recovering eWaste?

Recovering eWaste has a number of Positive impacts such as:

- Diversion of resources from landfill
- Reuse of raw materials

Recovering eWaste has a number of Negative impacts such as:

- Stockpiling
- Inefficient processes – not capable of handling all eWaste streams and ensuring clean raw product
- Unstable / unreliable end market
- Recyclers not capable of handling increased volumes and categories
- Backyard recyclers may set up primitive processes leading to illegal dumping
- Implications for landfill owners receiving eWaste in mixed loads:
- Who is going to "police" eWaste not being accepted into Landfill?
- What would a Landfill Owner do if eWaste is received in a mixed load of general waste?
 - who is responsible – the operator, the customer delivering?
 - what would be the process if eWaste is received? Quarantine, removal, at who's cost?
 - What liabilities does a Landfill Owner hold if eWaste is received at their site?

6. Do you believe there are particular reasons for not recovering eWaste?

Landfill is much cheaper than recycling and with the instability of the end markets, regulating a ban will be difficult

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7. Do you believe there are other issues with the eWaste recycling market, or with specific stages of the eWaste recycling market?

Recovery rates and reuse of raw components are some of the main issues. The collection and transportation especially in remote/regional areas also has high costs associated.

8. Are you aware of other barriers to achieving a sustainable eWaste recycling market?

eWaste may continue to be received in mixed loads of general waste at landfills especially now that the categories have been redefined and broadened. MRFs and other comingled waste recyclers will potentially begin to receive eWaste as consumers place their used irons, kettles and small electrical goods into their kerbside bins. Consideration to these types of recyclers and landfill owners on how to handle eWaste received needs to be given.

9. Do you think eWaste and its components are undervalued in Australia?

Yes, there has not been a big enough demand to date for recycled glass, plastics and other components.

What are the outcomes the Government want to achieve?

10. Do you believe that banning eWaste from landfill will achieve these outcomes?

The 5 outcomes identified in the document have the possibility to achieve the desired outcome in particular; 'increase community awareness' and 'create more jobs' however the other outcomes will either take a considerable time to achieve or simply may not meet the aims of Government.

'Increase recovery of eWaste' and 'Improve recycling technology' are two significant challenges and opportunities. The Government will need to make provisions for grants and funding to assist with new investment.

11. Are there other outcomes you believe the commitment should, or is likely to, achieve?

A recycling standard must be introduced and governed across the industry. This will allow for an even playing field for all eWaste recyclers. The current recycling industry is still in its infancy having only had small volumes/feedstocks operate on manual processes. Many of these recyclers will not have the funding to invest automated or improved technologies; this may take years.

Designing the approach – establishing eWaste criteria

12. What criteria do you think will be useful to help us determine how the different types of eWaste are managed in Victoria?

- Recovery rates
- Volumes (%) diverted from landfill
- Uptake of consumers/public using drop off/collection points
- Date from Transfer Stations, MRF's, Public collection points and Recyclers

Designing the approach - timing

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

Most probably

14. What changes, if any, will need to occur in your region before eWastes can be banned from landfill and managed properly?

Clear direction by Government needs to be provided on the direction for Landfill Owners if eWaste continues to be received at landfill. In particular, responses to the following questions is required:

- Who is going to “police” eWaste not being accepted into Landfill?
- What would a Landfill Owner do if eWaste is received in a mixed load of general waste?
 - who is responsible – the operator, the customer delivering?
 - what would be the process if eWaste is received? Quarantine, removal, at who’s cost?
- What liabilities does a Landfill Owner hold if eWaste is received at their site?

15. Do you think banning eWaste from landfill in Victoria will need to take a phased approach?

Yes, a phased approach should be considered

Designing the approach – principles to guide the design

16. Do you believe there are other principles that must be considered in the development of Victoria’s approach to ban eWaste from landfill?

As per the response in question 14, consideration must be given to Landfill Owners and how they are to deal with any eWaste delivered into a site. Who is responsible for the eWaste, what are the procedures and protocols if eWaste is identified in mixed loads, at whose cost would the eWaste need to be removed, who will be penalised for eWaste deliveries/acceptance at landfill?

Designing the approach – choosing the right tools

17. What other tools do you think the Government should consider when designing Victoria’s approach to banning eWaste from landfill?

Consideration to investment and opportunities for new technologies will be required, this may take time thus diversion rates will also need to be stepped over time.

Recycling and recovery standards must be developed, implemented and regulated by Government.

Funding for technologies, collections, education to local communities on what can be accepted.

18. How do you think community could be supported to ensure eWaste continues to be recovered and recycled?

Education programs, flyers, mail drops, media articles outlining what eWaste is, how the public can assist in diverting from landfill.

If volumes are to be expedited from landfill, then allow for free drop off into Transfer Stations or collection points but a financial subsidy must be provided to the collectors.

Designing the approach – other considerations

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19. What unintended consequences do you think the landfill ban could cause?

- Undue penalties or costs on Landfill owners – if eWaste was received into landfill and the eWaste needed to be removed, quarantined etc
- Increased costs at Transfer Stations / Collection points if source separation is required, if an increase in volume is received requiring addition bin rental, freight etc and no funding is offered
- Potential for stockpiling
- Increase in backyard recyclers with primitive recycling processes

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

- Clearly defined standards; communicated to all recyclers, collectors and landfill owners
- Regulated recycling processes

What other state and national work do we need to consider?

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 eWaste commitment

Reviewing and adopting the learnings from the South Australian eWaste ban should be considered