



FOR A BETTER WORLD

Level 11, 2 Southbank Boulevard, Southbank VIC 3006
Phone +61 3 9247 4777 Facsimile +61 3 9247 4747
Visy Industries Australia Pty Ltd ABN 74 004 337 615

www.visy.com.au

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Waste and Resource Efficiency Team
Sustainability Policy
Department of Environment, Land, Water and Planning
Level 1, 8 Nicholson Street
East Melbourne VIC 3002

To whom it may concern

RE: MANAGING E-WASTE IN VICTORIA

Visy welcomes the opportunity to comment on the Victorian Government's discussion paper, *Managing e-waste in Victoria*.

About Visy

Since starting out in Melbourne in 1948 as a manufacturer of corrugated cardboard boxes, Visy has since grown to become one of the world's leading packaging, paper and recycling companies. Today, the Visy Group employs over 5,500 staff and operates in over 120 sites across Australia, New Zealand, Thailand and Vietnam.

The Visy Group's recycling division, Visy Recycling, is one of Victoria and Australia's largest recyclers. Visy Recycling has five recycling plants across Victoria including two material recovery facilities, a glass recycling operation and two transfer stations. The materials principally recovered by Visy Recycling's operations include paper, cardboard, plastics, cans, glass and metals.

Managing e-waste in Victoria

In relation to the implementation of a landfill ban on e-waste, we believe it is imperative that the matters set out below are addressed in the government's strategy and relevant legislation to ensure the success of the new scheme and to ensure the viability of other streams of recycling (e.g. residential kerbside collection) are not compromised.

1. Collection and recovery of e-waste should continue within a dedicated recycling stream and be kept separate from existing streams such as kerbside recycling. Existing recycling streams and associated infrastructure such as MRFs which process recyclables collected kerbside are not designed and built for separating e-waste. As such, if e-waste were to be incorrectly placed in a residential kerbside recycling bin, not only would the e-waste not be separated by a MRF, it would be automatically diverted to landfill. Based on our experience in operating recycling streams, constant community education activities and communications will be required to ensure the community understands how to properly dispose of e-waste.

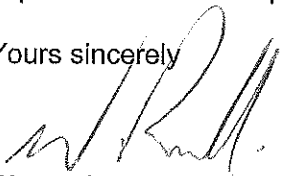
2. Low levels of e-waste in non-e-waste recycling streams such as kerbside recycling collection vehicles and MRFs should be exempt to ensure other recyclers do not inadvertently fall foul of the law. Consider a computer mouse that is put in a kerbside recycling bin and ends up in a MRF – such an item of e-waste would not be recovered by the MRF and would therefore be ejected to general waste and sent to landfill.
3. There should be a legal prohibition on disposing of e-waste to non-e-waste/recycling streams such as kerbside general waste and recycling bins. A likely response to a ban on landfilling e-waste will be an increase in general dumping of e-waste but specifically in kerbside waste and recycling bins. A legal prohibition on such dumping will be an important tool in attempting to prevent such behaviour.
4. In the event that there is an increase to the current landfill levy to make recycling more competitive to landfilling, such an increase should be made concurrently with reforms to the levy arrangements to provide for exemptions or remission of waste levies for genuine recycling, reprocessing and remanufacturing operations. The landfill levy is designed as an economic measure to drive improved environmental outcomes, however, at present its operation has the effect of limiting investment, jobs and further improvement of *bona fide* fully circular recycling businesses. Specifically, it has a considerable impact on the viability of MRF investments and continued investment in resource recovery and remanufacturing in Victoria. Accordingly, exemptions or remission of waste levies for genuine recyclers should be considered and implemented.

While Visy is always supportive of new recycling initiatives, we consider that it is important to highlight the risk of e-waste dumping in existing recycling streams as a result of the landfill ban. Amongst other things, the establishment of an accessible and viable e-waste recycling industry with proper community education will be key to avoiding compromising existing recycling activities and to the success of the government's policy.

We are grateful for the opportunity to provide the above initial feedback in relation to the Victorian Government's discussion paper on managing e-waste.

Visy looks forward to providing further input as the government moves forward with the implementation of this policy.

Yours sincerely



Wayne Russell

General Manager, National Operations (Visy Recycling)

Telephone +61 3 9247 4777

Mobile +61 418 473 506

Email wayne.russell@visy.com.au