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Date: 19 October 2015

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**RE: Managing E-Waste in Victoria - Starting the Converstaion Feedback**

The City of Ballarat welcomes the opportunity to provide feedback on the management of e-waste and consideration in planning for the diversion of e-waste from landfill. Upon reviewing the Managing E-Waste in Victoria – Starting the Conversation document, the City of Ballarat would like the following comments to be included as part of the review process.

1. The City of Ballarat support the banning of e-waste from landfill and a means to reduce hazardous materials from entering the environment and increase the recovery of valuable resources. Currently, there is limited understanding within the general public about disposal and recycling of e-waste, with much of the smaller items of e-waste ending up in landfill. Banning e-waste from landfills will be more challenging than the banning of other streams, such as mattresses and tyres, as many of the components are much smaller and will not be visible to landfill operators when they are dumped in larger loads. Any plan to divert more e-waste from landfill will need to be accompanied with a broad education and awareness campaign and the expansion for drop off locations in regional and rural area.
2. Barriers for recycling of e-waste that would need to be overcome in order for the ban to become effective include an understanding of what can be recycled, appropriate drop off locations, cost of disposal and trust that any personal data will be destroyed. It is these barriers that see e-waste currently being dumped in public reserves and stored in homes.
3. There is still limited understanding about e-waste recycling, including what can be recycled, where it can be dropped off and what happens to it in the recycling process. The City of Ballarat, over recent years, have found that the most effective waste education messaging has been through local media, namely local newspapers, radio and Council media. These have been the most effective method for advertising “Detox Your Home” and “Fire Safety – Free Green Waste Disposal Week”. Other effective methods include presentations to community based groups, such as Probus and disability careers support groups. With e-waste, due to the complex nature of all the categories of waste, a phase out approach could lead to confusion in the community, and a blanket ban from a set date would be an easier message to communicate.
4. A lack of suitable drop off locations in regional and rural areas can be a barrier to e-waste recycling. For the most part, there are collection facilities at Council run transfer stations, but the quality and security of these facilities is variable and is not always available to residents. A code of practice for the collection and disposal of e-waste would assist in bringing current arrangements into alignment and allow for a level playing field in the market. Drop off locations could be expanded to include community based facilities in more remote communities. Cost of disposal, where there are gaps in the National Scheme, creates a barrier to this type of collection. As there is wider understanding of the need to separate e-waste, the National Stewardship Scheme has been reaching its quotas before the end of the financial year. This has resulted in backlogs of e-waste, particularly in regional and rural areas where the costs of transport are higher.
5. With the introduction of such a ban, and the sudden generation of increased volumes of potentially valuable resources, particularly those that attract a disposal gate fee, there is a possibility that disposal operators could come onto the market, collect a gate fee, remove the valuable components of the waste and dispose of the remaining waste by landfilling or dumping. A code of practice could also help to ensure that the e-waste is being recycled in a suitable manner and assure the community that the waste is being appropriately disposed of and there data is completely destroyed.
6. An expanded e-waste recycling industry has the potential to benefit employment in rural and regional Victoria. Disability employment support organisations already operating in regional Victoria would have the opportunity to expand if volumes of e-waste were to increase at a reliable rate over the coming years. One barrier to effective processing of televisions in Victoria is a lack of ability to process the CRTs, which has led to potentially dangerous stockpiling. A ban on e-waste to landfills would see an increase in CRTs needing to be processed. Development and support of technology that could safely process these components would not only assist in the disposal of e-waste, but also make Victoria a national leader in this space, with potential to export this to other States in the future. However, this would require significant investment from the State Government to ensure viability.

If further information is required, please contact me at the details on this letter.

Yours sincerely

Lauren Burch

Strategic Waste Officer