**E-waste Discussion Paper Submission- Corangamite Shire**

**Background to Corangamite Shire**

Corangamite Shire is a large rural shire located in Victoria’s south west approximately 180km from Melbourne. Corangamite Shire has a population of 15,996 and covers an area of 4,407 square kilometers.

Council operates the Corangamite Regional Landfill at Naroghid and six small transfer stations located at Naroghid, Simpson, Timboon, Port Campbell, Derrinallum and Skipton. The Landfill receives around 34,000 tonnes of waste per year, servicing Corangamite residents, Colac Otway Shire, Warrnambool City Shire, Moyne Shire and private contractor. The transfer stations receive a total of 1770 tonnes per year.

In partnership with the neighboring councils in the former South West Waste Reduction Group, Council has been recycling e-waste at transfer stations since 2009. These collection services are currently contracted to Western District Employment Access (WDEA). As part of a social enterprise program to provide disability employment opportunities, WDEA collect e-waste from each of the site and dismantle it at their Warrnambool and Hamilton facilities. Last year 38 tonnes of e-waste was recovered from Council’s transfer stations.

Previously Council charged a small fee to cover the cost of e-waste recycling. With the introduction of the National Television and Computer Recycling Scheme, Council was able to remove fees for all e-waste recycling. Two years ago, south west councils ceased participation under in the scheme as none of the co-regulatory service providers were able to collect from the region due to the low quotas. This has meant that Council is now subsidising the current e-waste recycling program. To ensure the long-term continuation of this program, Council will need to find alternative cost models, particularly in the context of increased financial pressures owing to the local government rates capping.

### What is e-waste?

**Q 1: Is the proposed definition of e-waste clear to you?**

A: The proposed definition provides a clear description of e-waste that can be easily understood by the community.

**Q 2: Are the proposed categories of e-waste clear to you? If not, can you suggest any specific changes to the existing categories, or another method of categorisation?**

A: The proposed e-waste categories are relatively clear, although there needs to be clarification as whether hot water services are included in the e-waste definition.

### What are the problems with e-waste?

**Q 3: What specific issues do you believe we need to address by banning e-waste from landfill?**

A: There are a number of issues that will need to be addressed if e-waste is banned from landfill:

* Limited number e-waste recycling processors, particularly in rural Victoria;
* Ensuring accessible and convenient e-waste recycling services to all residents;
* Community expectations that there should be no end-of-life cost to recycling;
* Community education about the e-waste landfill ban and recycling alternatives;
* Lack of infrastructure to collect and store e-waste, particularly in rural Victoria;
* Illegal dumping of waste;
* Inappropriate disposal of e-waste such as disposal in domestic waste, street bins and loads to transfer stations;
* Compliance and enforcement of the e-waste landfill ban;
* Improving existing collection, storage and processing infrastructure to meet best practice standards;
* High cost of recycling and low value of materials recovered;
* Higher e-waste recycling costs in rural areas due to transport distances and lower volumes;
* New and emerging e-waste products where recovery markets are not yet available;
* Capital and ongoing costs of e-waste recycling collection programs- who pays; and
* Ensuring scalability of e-waste recycling solutions.

**Q 5: What do you see as potential impacts (both positive and negative) from recovering e-waste?**

A: Positive impacts include improved management of hazardous materials, reduced need for virgin materials, increased landfill airspace and lifespan and creating potential employment opportunities, particularly for social enterprises. Recovering e-waste also reinforces recycling education messages with the community, building on the kerbside recycling message.

Negative impacts include cost to community as recycling e-waste is currently more expensive than landfilling. This cost impact will be higher for rural communities where the landfill gate fees are generally lower and the cost of recovery will be higher due to high transport costs and lower recovered volumes.

Other negative impacts include illegal dumping and inappropriate disposal of e-waste especially if there is a ban on landfilling e-waste and a fee to recycle these items. Council has experienced similar issues with the introduction of ban on mattresses at the Corangamite Regional Landfill.

Many e-waste items are small and inconspicuous. This means that they can be easily dumped on roadsides/reserves and disposed into kerbside bins, street litter bins and transfer station loads. Small e-waste items are also hard to identify and remove from the landfill tip face. This will make regulating the e-waste landfill ban difficult and there may be significant costs to the community associated with illegal dumping and inappropriate disposal of e-waste.

**Q 6: Do you believe there are particular reasons for not recovering e-waste?**

A: Consideration should be given to excluding the recovery of low value e-waste items from the landfill ban. Items such as hairdryers contain little valuable recoverable materials and the value of this recovered material is outweighed by the cost of recycling. Council’s experience is that e-waste recyclers are currently landfilling these items rather recycling due to their low recoverable value.

 Without a market driver, recovery of the low value items will be difficult and costly. These items are generally small and non-hazardous so there may be minimal benefit diverting these items from landfill.

**Q 7: Do you believe there are other issues with the e-waste recycling market, or with specific stages of the e-waste recycling market?**

A: The proposed ban on e-waste to landfill may push more materials into the recycled metal market, especially if there are user fees associated with e-waste recycling. While this may be a better alternative to landfilling, other components such as plastics are not recovered. It is also likely that hazardous materials found within e-waste items may not handled and disposed of correctly if dealt with as scrap metal.

 There is also some uncertainty as to whether there are markets available for all the e-waste materials and if existing e-waste recycling processors are able to process all e-waste items included in the definition.

**Q 8: Are you aware of other barriers to achieving a sustainable e-waste recycling market?**

A: In rural areas, transport distances will be the biggest barrier to achieving a sustainable e-waste recycling market. Transport distances to processing facilities combined with low volumes will drive up the costs of recovering e-waste in rural areas. State Government must ensure that rural areas are not financially disadvantaged by the introduction of a ban on e-waste to landfill.

### What are the outcomes government wants to achieve?

**Q 10: Do you believe that banning e-waste from landfill will achieve these outcomes?**

A: Banning e-waste from landfill will not achieve these outcomes if done in isolation. A multi-faceted approach is needed to achieve these outcomes and to create sustainable pull markets for e-waste recycling, incorporating regulation, coordinated programs, infrastructure and investment.

 An essential component of this holistic approach should be the establishment of a Victorian e-waste recycling program. Council considers the key requirements of this program to be as follows:

*Cost*

 To be a success, there must be no capital or ongoing operating costs to local government (as e-waste collectors) and no fees for users at the point of disposal. In Council’s experience, most residents expect that that there should be no cost for recycling at the point of disposal. This is driven by a perception that there is a financial return from recycling. Local government do not have the resources to subsidise a collection program, particularly with the introduction of rates capping. A product stewardship program where the recycling costs are incorporated into the product purchase price will be the best model for this program.

 Any product stewardship program should cover all costs associated with collection, transport and processing of e-waste. This is particularly important for rural areas where the recovery costs will be higher due to transport distances and low volumes. The DrumMuster program is a good model for an e-waste recovery program with councils reimbursed for all inspection, collection infrastructure, transport and processing costs. Conversely, the National Television and Computer Recycling Scheme has failed to cover all costs in rural areas. Television and computer recycling providers charge high fees for the collection and transport of e-waste from rural areas, which must be covered by either the council or recovered from the waste user. The cost of infrastructure was also not covered under this scheme.

*Quotas*

Any quotas on e-waste recycling needs to be set high enough to account for the existing volumes of e-waste within the community.

 Quotas under the National Television and Computer Recycling Scheme were set too low and did not account for the high volume of televisions and computers already in the community. Many providers reached their quotas before the end of financial year and stopped servicing a number of the e-waste collection sites. This left collection sites with large stockpiles of televisions and computers. Rural collection sites were worst affected, as the low volumes and transport costs make these sites the least attractive for providers to service.

 *Accessibility & Convenience*

Having convenient and accessible collection recycling options will also be critical if e-waste is to be banned from landfill. In Council’s experience, rural residents are not willing to travel more than 20km to recycling collection points. Collection of e-waste at transfer stations provides the best option for convenient and accessible e-waste services.

Regionally based drop off point do not work in rural communities, as evidenced through the Detox Your Home permanent facilities. In Corangamite Shire, residents generally need to travel 40-80km to access a permanent Detox Your Home facility. Due to the travel distance, very few Corangamite residents are using these facilities and paint, light globes and batteries continue to be disposed of landfill or in stormwater systems.

*Infrastructure*

Investment is needed to develop new collection and processing infrastructure and upgrade existing infrastructure to meet current best practice. For example, Corangamite Shire currently provides e-waste recycling at six transfer stations across the Shire. Only one of these sites has power, water and the ability to store e-waste undercover. State Government support and investment would be needed to upgrade these to best practice standard.

E-waste recovery programs must ensure that existing processors are supported through investment in improved infrastructure. This is particularly for those processors that provide social enterprise outcomes.

 *Education/Promotion*

 There needs to be consistent statewide education and promotion of the e-waste landfill ban and e-waste recycling programs. State Government should take the lead role in coordinating this campaign, with local government to run local campaigns using the state resources. This could be similar to the Get it Right on Bin Night Campaign.

### Designing the approach- establishing e-waste criteria

**Q 12: What criteria do you think will be useful to help us determine how the different types of e-waste are managed in Victoria?**

A: These criteria also need to consider the cost of recovery for the different e-waste types. For examples, some types of e-waste may be more costly to dismantle or transport.

### Designing the approach- timing

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

A: Rural areas will require more time to prepare for the landfill ban as there is not the existing infrastructure and resources in place to collect, store and transport larger volumes of e-waste for recovery.

**Q 14: What changes, if any, will need to occur in your region before e-waste can be banned from landfill and managed appropriately?**

A: While there is an existing e-waste recycling program in the region, this would need to be improved before e-waste could be banned from landfill as follows:

* Development of statewide e-waste recycling program based on a product stewardship model where there is no cost to council and no fees for disposal.
* Upgrade of existing collection facilities to meet best practice.
* Upgrade of existing processing facilities to meet best practice and ensure that all categories of e-waste can be recovered.
* Education and promotion of the upcoming e-waste landfill ban and recycling program.

**Q 15: Do you think banning e-waste from landfill in Victoria will need to take a phased approach? If so, what do you think should be key considerations in determining how the phasing occurs?**

A: There should a statewide e-waste recycling program in place for at least five years before a ban on e-waste to landfill is introduced. This will allow the program to be fully operational and cost recoverable before the ban is introduced.

Rural areas should be transitioned to the ban first with support from State Government to address the transport and volume challenges of establishing sustainable e-waste markets in rural areas.

### Designing the approach - principles to guide the design

**Q 16: Do you believe there are other principles that must be considered in the development of Victoria’s approach to ban e-waste from landfill?**

A: Other principles include cost to local government and cost to the community. Local government does not have the resources to subsidise e-waste recycling programs.

### Designing the approach - choosing the right tools

**Q 17: What other tools do you think the government should consider when designing Victoria’s approach to banning e-waste from landfill? Be as specific as you can and consider details such as:**

* **Types of infrastructure that might be required**
* **Types of existing technologies available, both in Australia and overseas**
* **Opportunities for invention and development of new technologies**
* **Investment required**
* **Time required to implement**
* **Guidance that industry might need or want**
* **Information that community might need or want**
* **Level of government support and intervention**
* **…and any other details that might be useful**

A: Tools that will need to be considered include:

* Statewide product stewardship program for e-waste;
* Subsidies for rural areas to deal with high transport costs and to ensure that rural communities are not cost-disadvantaged;
* Education campaign including consistent statewide branding, television and radio advertising, media releases, website content, and access to logos, messaging and branding for local campaigns;
* Investment into collection infrastructure such as facilities to store e-waste undercover;
* Regulation banning e-waste to landfill, excluding small, non-hazardous items;
* Financial support to assist local government to regulate the landfill e-waste ban (such as bin audits);
* Investment in processing facilities to meet best practice, such as mechanical dismantling, particularly for small rural sites where markets are less able to drive investment.

Council does not support amending landfill licenses to prohibit the acceptance of e-waste. There is a high potential for e-waste to be inappropriately disposed particularly in kerbside bins due to the small size of these items. Landfill operators are at high risk of being non-compliant on their license due to inappropriate disposal, however they little ability to regulate inappropriate disposal.

**Q 18: How do you think community could be supported to ensure e-waste continues to be recovered and recycled?**

A:

* No cost to community at point of disposal;
* Local collection points that are accessible and convenient;
* Collection facilities that meet best practice standards; and
* Education about what is e-waste, why it is important to recycle and how to recycle.

### Designing the approach – other considerations

**Q 19: What unintended consequences do you think the landfill ban could cause? Please provide as much detail as possible and refer to any research or case studies that might help to support your feedback.**

A: The e-waste ban also needs to consider who pays for degassing or air conditioners, freezers and fridges. Where the waste user needs to pay for degassing, illegal degassing is more likely. The cost of degassing outweighs the scrap metal value of the item. Degassing of a fridge generally costs around $20 per item. The scrap metal value of this item in a rural area is currently around $2.60 to $4.40. Councils do not have the resources to subsidize degassing of these items.

**Q 20: How do you think the design of the approach to banning e-waste could be designed to mitigate these unintended consequences?**

A: As part of a product stewardship program, there should be subsidies for degassing to ensure it is completed by qualified de-gassers.

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

**Q 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 e-waste commitment?**

A: Any e-waste recovery program needs to consider emerging technology trends and policies to predict and prepare for future e-waste volumes and products. This approach needs to be proactive in responding to future e-waste recycling needs. The National Television and Computer Recycling Scheme failed to do this, commencing in 2012, two years after the Digital Television Switchover commenced.