**Managing e-waste in Victoria – discussion paper**

Submission in response to the discussion paper

From Glen Eira City Council

*This submission has been prepared by Council officers to reflect Council’s current approach and experience.*

# What is e-waste

**Q1 Is the proposed definition of e-waste clear to you?**

Yes

**Q2 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?**

Yes they are clear. Please note that Council currently treats some types of ewaste differently from others because of handling issues and other requirements. These types are:

* Council collects appliances with refrigerants (refrigerators; air conditioners) on a separate vehicle and degassed to remove refrigerants as part of the federal government requirements relating to ozone depleting substances.
* Although Council does not currently collect fluorescent lamps and CFLs itself, it has investigated doing so, and noted that the handling issues for these are different for other types of ewaste because of risk of airborne pollutants if crushed during handling.
* Large e-waste (larger than printers and microwaves). Are currently separated from hard rubbish collections.

# What are the problems with e-waste

**Q4 What do you see are current and future impacts of e-waste on the environment or human health? Can you provide examples?**

Council does not anticipate direct impacts for the Glen Eira Community as Council is about to close the last landfill that it manages and its responsibilities in regards to this will not be affected. There are also no open landfills in the City area.

Indirectly, unnecessary use of resources and pollution may contribute to collective long term risks that may impact the Glen Eira Community.

If additional ewaste recycling was to be done, new collection methods would need risks to be considered in line with health and safety obligations.

**Q5 What do you see as potential impacts (both positive and negative) from recovering e-waste**

The garbage that Council collects on behalf of the community currently goes to landfills that are highly engineered, monitored and managed where the risk of these materials escaping to the environment is fairly low. Whether or not some ewaste continues to be disposed to these landfill sites is not expected to result in significantly different risk at these sites, nor a reduction in required management practice at these sites once closed.

For Council, recovering large e-waste is already Council’s practice. Large ewaste (including TVs, Computers, larger appliances to the size of printer and microwaves) from the Glen Eira community is already separated from hard rubbish and dumped rubbish collection and recycled. 251 tonnes was recycled in 2014-15.

There would be some additional costs if Council was required to establish collections for smaller ewaste items (eg, batteries and CFLs). An annual waste audit of garbage bins emptied by Council for the Glen Eira Community found that around 0.85% (by weight) of garbage disposed was electrical waste in the last three years. This is around 250 tonnes per year.

# What are the outcomes government wants to achieve?

* **Increase community awareness**
* **Increase recovery of e-waste**
* **Provide certainty for industry**
* **Create more jobs**
* **Improve recycling technology**

**Q10 Do you believe that banning e-waste from landfill will achieve these outcomes?**

There is not enough information about how a ban would be implemented to assess how effective it would be at increasing the recovery of e-waste in Glen Eira City, or at achieving the other outcomes. More information is needed about how it would be implemented and any other policy tools to be introduced to support it.

If a ban was implemented in isolation, it is not clear which party would bear the cost burden of establishing any new collection channels or for enforcement activities. To achieve certainty for industry and local government, these questions would need to be resolved.

A ban is not expected to increase recovery of large ewaste items in Glen Eira, as this is already recycled. Depending on how a ban is implemented, there are small ewaste items that are currently disposed of by households into the garbage stream.

In Council’s experience, community awareness has not been essential for increasing the recovery of large e-waste. Council’s experience with recycling of large ewaste has found that when separation of ewaste was done after collection from the resident, significantly more ewaste was collected. Council’s drop off days were some of the best attended in the state, however they still collected only about a third of what Council now recycles through its standard hard rubbish and dumped rubbish service.

* Council ran three or four ewaste collection days each year for residents to drop off e-waste from 2010-11 to 2014-15.
* In 2014-15 Council instead started sorting all hard rubbish and dumped rubbish collected for TVs, computers, appliances and medium sized ewaste (printers; microwaves).

*E-waste recycled (tonnes) (extract from Glen Eira City Council Annual Report)*

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| 2010-11 | 2011-12 | 2012-13 | 2014-15 | 2014-15 |
| 110 | 85 | 70 | 67 | 251 |

When Council ran ewaste recycling days, the cost of recycling of ewaste was around five times the cost of disposing of that waste to landfill (not including changes in collection costs).

For large ewaste items, Council has found it more efficient (least cost overall) to sort waste after collection through an existing collection channel – specifically it now sorts hard rubbish after collection and it has found this to be lower cost per tonne than running drop off days (as well as more effective).

Council doesn’t have a good understanding of how business disposes of ewaste and therefore it is difficult to comments on the impacts of the ban on business. This needs to be explored by the Victorian government.

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

There is not enough information about how the ban would be implemented to assess if additional costs would fall to Glen Eira City Council. Any costs would either require an increase in costs for the community (through rates and charges), or reduction in other services.

# Designing the approach - timing

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

Please refer to Q5 and Q14.

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

Glen Eira City Council already separates and recycles a range of ewaste from the hard and dumped rubbish it collects from the community.

It is small ewaste items (such as batteries) that would need new collection or recycling options to be established if recycling was required. Until the details of how a ban would be implemented and any associated policy tools are known, it is not possible to assess if this cost would be born by Council or not and therefore what the impact would be.

Council is not aware of current options that are known to achieve widespread better disposal of smaller ewaste items (batteries, cords, toasters). Council’s experience with larger ewaste is that there is a significant proportion of ewaste that drop off sties will never collect. Officers experience with consumer behaviour suggest that the likely most effective options will be if post-consumer sorting is possible – for example a pre-sort facility at a landfill, or separation from mixed recyclables at a MRF.

**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?**

There is not currently enough information about how a ban might be implemented to assess the impacts on Council and to understand if councils would be required to establish and fund new collection services or enforcement activities. If so, a phased approach would allow Council to understand and respond to any new obligations in a planned and efficient way. Victoria is introducing rate capping from the 2016-17 year, which means that to increase services, councils may need state approval in advance – the lead time generally needed to introduce change without being significantly disruptive to core activities is around two years.

Council does not support cost shifting from state to local governments, which could be the outcome of a ban, depending on the details.

# Designing the approach – principles to guide design

**Q16 Do you believe there are other principles that must be considered in the development of Victoria’s approach to ban e-waste from landfill?**

Council does not have a specific position on this.

Generally Council does not support shifting of costs onto local government from industry or state government.

Council is also required under the local government act to consider Best Value in delivering community services. In the experience of Council officers when planning waste management collection and disposal services, the collection costs and disposal costs need to be considered together to assess the lowest overall cost to the community. The various effectiveness of collection channels (considering demonstrated community behaviour) and costs born by more than one party, also needs to be considered. It is not necessarily true that the lowest disposal costs + the lowest cost collection costs = the lowest overall costs.

# Designing the approach – choosing the right tools

**Q 17 What other tools do you think we will need to consider when desiging 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**
* **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**

Infrastructure

The availability of processing infrastructure is the key determiner of the types of collection systems Glen Eira City Council has the option of establishing (for example, if a materials recycling facility was able to accept batteries, then batteries could be put in the recycling bin, but if not, the only option to help the community recycle is to separate them from garbage after collection, or start a dedicated recycling stream).

Collection methods and consumer behaviour

Council’s experience with larger ewaste collection is that there is a significant proportion of ewaste that drop off sites will never collect. Council’s drop off days were some of the best attended in the state, however, they still collected only about a third of what Council now recycles through its standard hard rubbish and dumped rubbish service.

* Council ran three or four ewaste collection days each year for residents to drop off e-waste from 2010-11 to 2014-15.
* In 2014-15 Council instead started sorting all hard rubbish and dumped rubbish collected for TVs, computers, appliances and medium sized ewaste (printers; microwaves).

*E-waste recycled (tonnes) (extract from Glen Eira City Council Annual Report)*

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Also, in Glen Eira’s experience, even with a community that generally recycles well through its three bin system, there is some degree of incorrect sorting at household level. In Glen Eira around 20% of the garbage disposed to garbage bins in 2014-15 was recyclable and was incorrectly disposed.

To comply with federal requirements for management of refrigerants, some e-waste must be separated in any case for degassing – considering this existing requirement the extra step of recycling these materials has incurred no additional collections cost.

Product stewardship

The product stewardship arrangements for TVs and computers have worked reasonably well for Glen Eira City Council as it was able to secure free recycling via the Scheme for some of its drop off days. Council officers are aware that this is not the case for all local governments. Another benefit of the introduction of the product stewardship legislation has been that more recycling points are available for the community, often run by retailers.

Barriers

Glen Eira City Council provides waste services its community, but faces a number of barriers that it does not have the tools to overcome, but which state government may be able to address:

|  |  |
| --- | --- |
| **Barriers** | **State government policy options that may overcome barriers for Glen Eira City Council** |
| Limited control over incorrect sorting by households | Support industry to establish post-consumer sorting of ewaste – from either the garbage streams or mixed recyclables stream |
| Interested in recycling more, but may be subject to cost considerations and rate capping,  | Rebates for increased recycling of materials that cost more to recycle than to send to garbage.Support funding of better waste infrastructure such as pre-sort facilities at landfill |

**Q18 How do you think community could be supported to ensure e-waste continues to be recovered and recycled.**

Councils experience with larger items has been that post-consumer sorting was far more effective at diverting a large proportion of ewaste than options which require drop off or special effort. This approach has not needed community awareness in order to successfully increase recycling.

Council’s experience is that education programs are needed to support correct use of waste collection, but that they have a significantly limited ability to overcome other barriers such as the inconvenience. As a result, Council has focused most of recent activities on improving the convenience and effectiveness of recycling collection systems:

* it has made organic waste collection bins a standard part of its wastes service to overcome barriers including lack of access to organic bins, financial barriers and difficulties for tenants in ordering bins via their landlords. This has increased green waste recycling significantly.
* it has moved to post-consumer sorting of hard rubbish as a direct result of its experience with drop off days which showed that they would only ever achieve recycling of part of the ewaste stream.

Small ewaste is currently put in garbage bins contrary to the information and advice provided to residents and this can already be regarded as improper use of garbage bins. Council officers would not expect a ban to change this in isolation, however other policy tools might. Current product stewardship arrangements have been reasonably effective at increasing the recycling rate for TVs and computers and have allowed Glen Eira to work with industry to set up new ways of recycling large ewaste. They have also resulted in an increase in other channels available to the community. Deposit schemes have been shown to work fairly well for containers in some situations.

# 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.**

Until there are practical, convenient and funded alternatives to disposing of ewaste to landfill, a ban would be unreasonable and unrealistic.

A ban could present significant practical difficulties in regards to enforcement for community waste. For example, if a household disposes of batteries into a wheelie bin incorrectly, would the landfill be required to reject a truck load of garbage? If this were the outcome it would leave Council is a very difficult position: there are no garbage sorting facilities currently available for Council that could remove batteries and the one lever Council has to change household behaviour (education) has very limited effectiveness (for example, even though the Glen Eira community are generally good recyclers and despite regular and ongoing recycling education, around 20% of the garbage disposed by the community, should have gone into the mixed recycling bin).

**Q20 How do you think the design of the approach to banning e-waste could be designed to mitigate these unintended consequences?**

Illegal dumping and inappropriate storage

Council collects around 8000 instances of dumped household goods a year from around the City which include ewaste. Council currently recycles this ewaste and does not expect a ban to increase the burden on Council. Council removes this dumped rubbish because of the importance to the community to having safe and clean streets, and because it is usually not possible to meet the requirements for collecting evidence that could allow enforcement tools to be used. This leaves Council with very few management options for reducing illegal dumping, however it attempts to do this by having a free and convenient hard rubbish service as an alternative. Its hard rubbish service collects around 24000 bookings each year.

Informal recycling operations

Council checks a range of approvals and accreditations during its procurement processes. It would expect to seek evidence of approvals for recycling operators if there was a requirement for particular accreditation or approvals.

Exporting to countries with lower standards of environmental practices

Glen Eira City Council’s procurement policy states “Council will use its best endeavours to support sustainability through its purchasing activity, monitor

and report on Council activities and programs that have an impact on or contribute to the environment, including general procurement.”

In the recycling sector, it is difficult to monitor and track performance of subcontractors. The state government may be able to overcome some of these difficulties through accreditation or monitoring programs.