Submission coversheet

Complete this submission coversheet and attach to your own feedback document. Send both documents using one of the following methods:

* + - * By email to: [wastepolicy@delwp.vic.gov.au](mailto:wastepolicy@delwp.vic.gov.au)
      * By post to: Waste and Resource Recovery team

Department of Environment, Land, Water & Planning

PO Box 500

Melbourne VIC 8002

Fields marked with an asterisk (\*) are mandatory.

Contact Details

|  |  |
| --- | --- |
| **Title\*** (please specify one of the following) | Mr  Mrs  Ms  Miss  Dr  Other \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| **Full Name \*** | Kerrie Tomkins |
| **Postcode\*** | 3331 |
| **Telephone** | **035220 7111** |
| **Email Address** | Kerrie.tomkins@gplains.vic.gov.au |
| **I am making this submission on behalf of \*** (please specify one of the following)  Individual  Non-government organisation / community organisation  Business  Local Government  Other government entity  Other:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  **Name of organisation (if applicable):** \_\_\_\_\_\_\_Golden Plains Shire Council | |

Privacy Options

**Please select an option\***

This submission is being made by an **organisation** and I understand that it will be published, including the name of the organisation

I am making this submission as an **individual**. I request my submission be published anonymously with my postcode but with no other details.

Copyright and Third Party Information

|  |
| --- |
| Please note your submission will be treated in accordance with the Privacy Collection Notice on Page 3. You should not include any other personal information in your submission, such as email and phone details, unless that information can be made publicly available.  I have read the Privacy Collection Notice (refer page 3) **\*** |
| I am entitled to deal with the intellectual property rights (including copyright) of all material (both mine and any third party's) in my comments and have obtained the necessary consent(s) from any and all third parties owning the copyright for such dealings.  I agree**\*** |
| Where personal information about other people (including photos) is included in my comments, I have notified them of the contents of the Privacy Collection Notice on Page 3 and obtained their consent to their personal information being disclosed to DELWP and published on the internet.  I agree**\*** |

Confidential Submissions

If you have a genuine and pressing need for confidentiality and wish to make a submission please email [wastepolicy@delwp.vic.gov.au](mailto:wastepolicy@delwp.vic.gov.au) or call DELWP general enquiries on 136 186. Your request for confidentiality will then be assessed. Confidential submissions will not be published, quoted or summarised.

Privacy Collection Notice

The Department of Environment, Land, Water and Planning (DELWP) is committed to protecting personal information provided by you in accordance with the principles of the Victorian privacy laws. For more information read DELWP's Information Privacy Policy at [www.delwp.vic.gov.au/privacy](http://www.delwp.vic.gov.au/privacy).

The personal information in your submission is collected by DELWP to administer the public consultation process only. Your contact details may be used by DELWP or its contracted service providers under confidentiality agreements to survey you about your experience with DELWP.

Your submission has been collected by DELWP for the purpose of developing approaches to banning e-waste from landfill. Approaches will then be analysed (including an assessment of regulatory impact) to determine and implement a preferred approach.

All submissions are public documents and may be accessed by any member of the public unless you request, and your comments are given, confidential status. DELWP may do the following with your submission (your personal information will not be included):

* Publish a copy of your submission on the DELWP website or other Victorian Government website.[[1]](#footnote-1)
* Quote directly from your feedback in the DELWP response to feedback and subsequent regulatory impact assessment.
* Make available to other Victorian Government agencies.

**If you are making comment as an organisation,** then your comments may be published, including the name of your organisation.

**If you are making comments as an individual,** then your comments may be published, including your postcode but with no other details.

You have the right to access and correct your personal information. Requests for access should be sent to the Manager Privacy, P.O. Box 500 East Melbourne 3002 or contact by phone on 03 9637 8697.

# E-waste landfill ban – overview and request for feedback

Questions for councils:

* Do you support the State’s proposed definition of e-waste? If not, why not? What definition would you support?

The definition is satisfactory– as long as it is consistent with international with national definitions.

* Are the e-waste categories (in diagram above) clear to you?

The categories are clear and concise

## Existing e-waste programs

Question for councils:

* What has been your experience of existing e-waste recycling programs – what has worked well and what hasn’t worked well?

The national product stewardship scheme for televisions and computers and computer peripherals has created significant issues for local government:

1. Storing of and management of materials at transfer stations until collection could be organised was an issue as not all transfer stations have an undercover storage area and managing the materials is a cost to council – staff have to be trained in the correct procedures and OH&S issues regarding the storage and handling of the materials.
2. The quota system applied to the national scheme resulted in a raft of issues for both local government and the social enterprises involved in the scheme – large stockpiles of CRT’s posed a potential hazard due to only company processing the item and they then increase their gate fee which was not covered under the arrangements with the organisations running the scheme.
3. Community expectations/perceptions – all e-waste should be free to drop off at the transfer station makes it difficult to manage as there is a cost to local government.
4. Mobile Muster; Phonecycle and “They’re Calling You are phone recycling programs that work very well, because all of these programs make it easy for the community to recycle their phones by providing collection and pick up on request at no charge to local government.
5. Battery Back has worked well in getting the community to recycle, however it is at a significant cost to local government to have the batteries collected, transported and then processed at ToxFree. Batteries can pose a significant problem if placed in the kerbside waste bin and end up in landfill – we have had a number of incidents where lithium batteries have caused fires in the landfill cell.
6. The recycling of Fluorescent Tubes is an issue for local government, the cost of purchasing the boxes, transport and processing of the materials at ToxFree is costly, as Golden Plains Shire does not have a Detox Facility our residents are required to travel to either Geelong or Ballarat facilities. A program where the collection point is at the point of purchase would work better and this should be the case for all e-waste. If you are purchasing an electronic product you bring your old one in to replace it.

## Viability of Victoria’s e-waste recycling industry

## E-waste criteria

The paper notes that the State is aiming to establish a set of criteria that will be applied to the various e-waste types to help determine the approach that best meets the needs of the Victorian environment, industry and the community. Criteria might include (but are not limited to):

* current or future market value of specific components of e-waste
* level of known risk to the environment and human health
* trends already observed overseas
* availability of existing processing technology
* actual or projected volumes

Question for councils:

* Do you agree with these criteria? What other criteria would you recommend be included?

Projected or actual volumes should not be a criteria, research has shown that householders store a minimum of four (4) items of e-waste, often in the hope that someone else may be able to use it. This makes it difficult to estimate volumes, also the quota system applied to the TV and Computer scheme demonstrated that the community stores these items as the program reached the set volumes very quickly.

Suggest that the following criteria is included:

a) The availability of accredited processors for the materials – *the technology maybe available, but with a facility to process the material it is at risk of being either stockpiled at the transfer station indefinitely or sent overseas.*

b) Distance need to travel to market – *the transportation of materials is a significant cost –* *for example CRT’s need to be transported to Sydney for processing.*

## Principles to guide the design of the ban

Question for councils:

* Do you agree with these principles? Are there other principles you think should be adhered to?

The principles to guide the ban should include:

1. Liaise and support local government to ensure adequate and appropriate infrastructure, collection and transport systems are established.

There is a significant concern that local government will bear the cost burden of stockpiled materials at their Transfer Stations that have little or no market value and costly to transport and process.

Question for councils:

* What other unintended consequences do you think the landfill ban could bring? How might the risk of these unintended consequences be minimised?

1. Community expectations - *they can recycle all their e-waste. Local government is seen by the community as the first place to call when they wish to dispose of this material*.
2. Illegal dumping – *an ongoing issue for a range of materials which council has to pay to clean up.*

Suppliers of electrical goods (point of sale) should be engaged and required to offer a service to “recycle” to customers as part of the “sales package” so the cost can be incorporated into the price rather than council charging a fee at the transfer station – this would reduce the risk of illegal dumping.

## Choosing the right tools

The paper acknowledges that the successful implementation of a landfill ban cannot be achieved through regulation alone; there will be a need for a range of tools, both regulatory and non-regulatory. The table below sets out a sample of the types of tools that may be used to form an approach to banning e-waste from landfill:



Question for councils:

* What particular tools do you think will be important to achieve a successful ban?

All of the above tools are appropriate, however, the expectation of the community that they can recycle all their e-waste requires management especially if there is no market or processor for the product locally.

## Other considerations

1. For transparency and accountability, the contents of your submission may be published on a Victorian Government website which is accessible worldwide. Any person may view your comments. Your comments may remain on external servers, even once your comments are removed from the original website it was published on. [↑](#footnote-ref-1)