# Managing E-Waste in Victoria

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# Managing E-Waste in Victoria

The Department of Environment, Land, Water and Planning (DELWP) has released a public [discussion paper](http://www.delwp.vic.gov.au/__data/assets/pdf_file/0005/313673/E-waste-ban-discussion-paper_online_R.pdf) to invite feedback on possible approaches and issues with implementing the Victorian Government’s election commitment to ban e-waste from landfill.

The Technical Advisory Reference Group (TARG) has prepared the following responses to questions within the discussion paper. TARG is a group established to advise, assist and inform the Metropolitan Local Government Waste Forum (the ‘Forum’). The Forum is administered by the Metropolitan Waste and Resource Recovery Group. TARG is the advisory reference group required to be established under the Metropolitan Local Government Waste Forum Operating Guidelines.

TARG is an officer group and as such the views expressed in this submission do not reflect those of the Metropolitan Waste and Resource and Recovery Group, and if individual councils submit their own responses these should be considered the definitive responses from those councils.

The Technical Advisory Reference Group supports diversion of waste from landfill. An e-waste landfill ban will have a number of significant implications for councils, particularly rural and regional councils where transport costs are high and service providers are much less accessible. Also, there are significant implications for those councils that do not have a resource recovery centre or transfer station within its municipality to offer ongoing and regular services to its communities.

# 2.1 What is E-Waste?

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

Response:

The definition of e-waste overall is clear, and aligns with the European model. The inclusion of all appliances that use a power source will mean less confusion for the community and a broader flow of recoverable materials. This definition also appears to be broader than the original ‘end of life’ definition used in the NTVCRS, implying that reuse options will be explored for e-waste items with final disposal being the last available and least favoured option. If this is not the intention, it is recommended that this pathway be considered as optimal to ensure the best diversion and recovery rates are achieved.

## 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?

Response:

The categories in Figure 2 are still relatively broad and exclude a lot of common items. This may be due to the proposed main categories being indicative at this stage rather than definitive.

The benefits of more specific categories would include greater certainty for industry, for local governments, and for the community.

Common items should be specified to give clear instructions to the community, allow for collection service infrastructure design and planning, and give industry certainty about the range of items to be managed. Some of the more common items that do not appear in Figure 2 include:

* Kettles
* Heaters
* Freezers
* Landline phone
* Mobile devices (tablets/PDAs etc)
* Hair straighteners
* Vacuum cleaners
* Clocks
* Electric shavers
* Electric knives
* Video cameras and cameras
* Power cords/power boards
* Video recorders, DVD players, BluRay, personal video recorders (PVRs)
* Table and floor lamps
* Electrical or battery rechargers
* Power tools
* Lawn edger

One idea to simplify the scheme for consumers (the community), could be to categorise them in a similar way to the ‘Get It Right on Bin Night’, which shows consumers what to recycle from each area of the house. For example, e-waste could be put into categories that reflect where in the home they are used, such as:

Laundry (specific list would include washers, dryers, irons)

Kitchen (specific list including white goods, appliances)

Living room (specific list including TV, remotes, DVD player, gaming systems etc.)

Bathroom …(hair dryers, straighteners, toothbrushes, shavers etc.)

Garden…..and so on

It would be advisable to assess the successes and learnings from Get It Right on Bin Night categorisation methodology.

Or, another approach could be divide categories up into how we use them, for example:

Personal care (toothbrushes, shavers etc.)

Computing

Entertainment

Leisure

Gardening

Travel

Etc.

As suggested above, using learnings from other e-waste and broader schemes in Australia and Europe would be of value. This would enable continuous improvement by building on existing successful methods and excluding those that have not been successful. The model of categorisation used should be developed to compliment the methods of collection that are going to be used, to gain maximum efficiency in sorting, and minimise confusion. Consultation with consumers should also be carried out to ascertain the most effective engagement and education methods.

# 2.2 E-Waste in Australia

Although there are no questions from this section, some comments are offered:

* The lack of information on end of life and other types of e-waste suggests gathering quality data on this will be essential for managing e-waste;
* It is progressive to see non-end of life e-waste discussed
* Acknowledging built-in obsolescence is progressive
* The discussion around product design indicated that the design of electronic products needs to be overhauled, with more focus on easy to repair and recover items. However, it is not clear if this will be included in the scope of the e-waste landfill ban work or if this will fall within the wider producer responsibility work of State government.

## 3 What are we already doing to manage e-waste?

Again there are no questions in this section to answer, but a comment offered is that it will be imperative to learn from the NTVCRS and the feedback that has already been provided on that scheme. There were a number of failings of the scheme and these have been addressed by stakeholders as part of the NTVCRS review in 2015.

The existing schemes for mobile phones, cartridges and batteries offer insight into infrastructure provision and consumer use that should be taken into account when developing the broader e-waste scheme.

The gap in data about e-waste that is recycled via informal channels needs addressing; programs such as Bright Sparks should be consulted to ascertain if they can help fill that gap.

# What are the problems with e-waste?

## Q3: What specific issues do you believe we need to address by banning e-waste from landfill?

Response:

International and national examples show that the planning for and implementation of landfill bans needs to include:

* analysis of environmental and financial outcomes and technologies
* local involvement and implementation
* clear responsibilities and cooperation between government levels
* juridical and financial instruments
* transparency and clear communication to the public
* clarity in establishing timelines for compliance

(Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>).

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

Response:

The current and future impacts of e-waste on the environment have been well addressed in section 4 of the discussion paper.

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

Response:

The potential impacts from recovery of e-waste may include:

* increased awareness by consumers of the costs and environmental effects of discarding e-waste (a positive)
* increased resource recovery (positive)
* local government may need to fund additional services (negative)
* reduced waste to landfill (positive)
* increased producer responsibility (positive)

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

Response:

Yes, the barriers to recovery of e-waste include lack of infrastructure, poor understanding of the issues by the community, lack of legislative drivers, and lack of producer responsibility, as well as the other viability issues examined in section 4 of the discussion paper.

## 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?

Response:

The stability of markets needs to be considered before implementing a ban. This is particularly important where there are substantive transport distances and also vulnerabilities in price fluctuations of components (Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>). The reliance on manual labour to dismantle products also means an exposure to occupational health and safety risks and high costs. Research, development and investment either privately or a public-private arrangement into technologies that reduce these costs and risks is essential.

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

No response is provided for this question.

## Q 9: Do you think e-waste and its components are undervalued in Australia?

Response:

Although this question may better be answered by industry, the current lack of recovery, dumping of e-waste and barriers to recycling implies that this is an issue.

# 5 What can we achieve by banning e-waste?

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

Response:

The examples cited in the discussion paper suggest that the specified outcomes are achievable.

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

Response:

The commitment should include integration with producer responsibility progress and engage industry on how they would prefer to assist with managing their waste products – would they prefer a point of sale levy, to fund recovery infrastructure, or assist by requesting design is improved to allow for easier repair, resource recovery and recycling? Currently the ownership transfers to the consumer and Government at the point of purchase – the producers appear to be able to profit from sales without obligation to assist in resolving issues created by the products they have profited from selling. A more equitable approach would be to engage them in this scheme to support better and more effective outcomes.

# 6 Designing the approach to e-waste in Victoria

## Q12: What criteria do you think will be useful to help us determine how the different types of e-waste are managed in Victoria?

No response is provided for this question.

## Q13: Do you think some regions will require more time to prepare for a landfill ban than others?

Response:

Yes – particularly rural/regional municipalities which have less well developed infrastructure and different transportation needs, and councils in metro and regional areas that do not have a transfer station or any resource recovery facilities. This is where engagement with industry will become key, as they will be the natural go-to providers of collection points for e-waste.

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

Response:

Mature successful market alternatives and processing technologies will need to be available for a ban of e-waste to landfill to be implemented. Also for a ban to physically work at full strength, a landfill pre-sort would beneficial to exclude the e-waste collected from bin or skip based collection systems. Ideally landfills would have arrangements with the mature market alternatives to redirect the e-waste at minimal cost and ideally penalties would not apply.

If penalties do apply a fair process to manage the penalties that may apply to communities who have disposed of e-waste in this way will need to be established. It would be very difficult for councils or the waste industry providing private waste services to businesses to prevent e-waste from entering the bin or skip based collection system. It would be anticipated that if a landfill pre-sort was implemented that financial penalties may apply back to a council or the waste industry and therefore ultimately to the community or business.

If e-waste is to be collected via bins, appropriate infrastructure needs establishing with significant education before it can be understood and utilised by the public. This would likely consist of a mixture of RRC’s, transfer stations, council depot and industry collection points.

## 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?

Response:

A phased approach will be required to ensure that alternatives are well in place before implementation especially if there are any penalties. Also a monitoring and reporting program will also need to be in place and functioning well. If a ban is implemented products that have more mature alternatives that are already supported through other waste management approaches should be implemented first such television and computers, batteries, lighting and mobile phones. Consideration should also be made to the main sources of e-waste and the likelihood of capturing or preventing e-waste from landfill. For example, e-waste from larger businesses and industry should be targeted first who may produce larger quantities and in bulk before from smaller business or households who produce smaller quantities and are harder to source separate from kerbside bin collections or private skip or mobile bin services. International research suggests a minimum of two years is required to notify and implement a landfill ban (Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>).

## 6.3 Principles to guide the 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?

Response:

The scheme should consider equity of service provision and account for the propensity of consumers to travel to access recovery services for e-waste. The simpler and more accessible the scheme is for residents/consumers/the community, the more likely it is to be successful.

# 6.4 Choosing the right tolls

## Q17: 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

Response:

As previously mentioned international and national examples show that the planning for and implementation of landfill bans needs to include:

* analysis of environmental and financial outcomes and technologies
* local involvement and implementation
* clear responsibilities and cooperation between government levels
* juridical and financial instruments
* transparency and clear communication to the public
* clarity in establishing timelines for compliance

(Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>).

Issues that need to be addressed if banning e-waste from landfill include the success of alternative or potentially coexisting initiatives, the importance of having other alternatives in place at least two years prior to a ban, compliance and enforcement processes and funding support.

There are other initiatives that the Victorian Government should acknowledge in the research into a ban of electronic waste to landfill, including the environmental (including waste diversion, greenhouse emissions and water consumption), social and financial outcomes. These include the following:

* National Television and Computer Recycling Scheme (NTVCRS) mentioned in the discussion paper and some previous responses, with reference to television and computers, and learnings that can be applied to the broader scheme, for example, it is worth noting that local government suffered specific impacts from the NTVCRS which in 2014/15 have included unbudgeted expenditure to dispose of e-waste collected from the community. Once the community expectation was set up that TVs and computers were able to be collected and recycled via local government (as a result of the NTVCRS), it was impossible to retract that service or reframe that expectation, and local government was left to fund the shortfall by paying for e-waste to be recycled that was above the low targets set by the NTVCRS. For example, Moreland Council spent almost $25,000 of unbudgeted ratepayer’s funds to manage the e-waste collected through the hard waste collection that was not accepted by the co-regulatory arrangements. This is a key learning from the NTVCRS and should be taken in to account when developing the new scheme. With the move towards a rate-capped environment, local government will be less able that ever to find unbudgeted funds to manage such matters
* Sustainability Victoria’s Household Chemical Collection program which accepts batteries and lighting from permanent sites
* the not-for-profit Mobile Muster mobile phone recycling program that is voluntarily funded by mobile phone industry groups
* councils services such as e-waste collection events, services provided at council owned landfills, resource recovery and transfer stations, the collection of e-waste through hard waste collection services and the collection and recycling of illegally dumped e-waste, and new e-waste recovery and repair programs such as Bright Sparks (led by Moreland Council)
* the South Australian model and its effectiveness including the environmental, social and financial outcomes on all stakeholders including local government
* the ACT Government’s ban on computers and televisions from being landfilled. An ACT Auditor General report states that “it is not known what proportion of all household and small business e-waste generated in the ACT is recycled. Data from two recent audits of landfill waste suggests that at least 100 and possibly up to 400 tonnes of all types of e-waste a year still goes to landfill, even after the introduction of both bans. Prior to the introduction of the television waste ban, the ACT Government estimated that around 200 tonnes of televisions alone were disposed of in landfill in the ACT each year” (Source: <http://www.audit.act.gov.au/auditreports/reports2012/Report%20No.%205%20Management%20of%20Recycling%20Estates%20and%20E-waste.pdf>)

The Victorian Government should also consider the *Product Stewardship Act 2011* (the Act) including plans for the Australian Government to list further electronic items to be considered for some form of accreditation or regulation under the Act or research already completed for products considered. End-of-life air conditioners and refrigerators with small gas charges were also under consideration. A cost benefit analysis in 2014 of introducing a product stewardship scheme for these products did not show a net benefit to society and the Australian Government will not pursue further work at this time (source: <http://www.environment.gov.au/protection/national-waste-policy/product-stewardship/projects>). End-of-life batteries less than 5kg in weight are one of these items under consideration (source: <http://www.environment.gov.au/protection/national-waste-policy/product-stewardship/legislation/product-list-2015-16>). Consideration of the Australian Government’s plans will ensure that alternatives are in place before a ban is implemented but also minimise double handling in terms of governing systems, schemes or regulation.

Landfill bans are never the only instrument of waste management. It is important if a ban is implemented that there is an understanding of where waste will be diverted by the bans and the development of programs or regulations to ensure that waste will be diverted into the preferred alternative treatments (Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>).

In terms of infrastructure, as previously mentioned for a ban to work at full strength, a landfill pre-sort would beneficial to exclude the e-waste collected from bin or skip based collection systems. Ideally landfills would have arrangements with the mature market alternatives to redirect the e-waste at minimal cost and ideally penalties would not apply to communities or businesses. Infrastructure investment either privately or a public-private arrangement would be needed for this to occur.

Before a ban is implemented there will need to be consideration of the stability of the markets for the end products or components. This is particularly important where there is some distance to markets such as for rural or regional communities or councils or there are price fluctuation vulnerabilities (Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>).

In terms of compliance and enforcement in Europe and North America compliance effectively rested with landfill operators and requires attention to how sites are audited for compliance. To enforce a ban there must be a way to identify the banned e-waste and who will be responsible for enforcing the ban (Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>). Preventing the transport of e-waste out of Victoria will also need to be enforced.

As previously mentioned international research suggests a minimum of two years is required to notify and implement a landfill ban (Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>).

A monitoring and evaluation framework is also important to measure the success of a ban. Waste diversion from landfill bans as they are applied in Australia is very difficult to quantify. The waste targeted by landfill bans makes up a small fraction of overall waste disposal (Source: <https://www.environment.gov.au/protection/national-waste-policy/publications/landfill-ban-investigation-final-report>). When setting up monitoring and evaluation frameworks, it will be important to consult with industry, local government and the other key stakeholders about what useful data can be collected, and to establish clear criteria from the start to avoid differences in interpretation of which data is collected and how. This would increase the quality of the data obtained and ensure correct conclusions can be drawn.

In ACT’s experience it is not known what proportion of all household and small business e-waste generated in the ACT is recycled. Data from two recent audits of landfill waste suggests that at least 100 and possibly up to 400 tonnes of all types of e-waste a year still goes to landfill, even after the introduction of both bans. Prior to the introduction of the television waste ban, the ACT Government estimated that around 200 tonnes of televisions alone were disposed of in landfill in the ACT each year. No precise data is available in the ACT for the growth specifically of the television and computer elements of the e-waste stream, as ACT waste audits do not consistently distinguish between computers and other office equipment, or between televisions and other medium-sized house electrical goods. The ACT Auditor General recommended that the ACT develop and implement a long-term e-waste monitoring and evaluation framework to determine and report on the environmental, social and financial effects of e-waste projects (Source: <http://www.audit.act.gov.au/auditreports/reports2012/Report%20No.%205%20Management%20of%20Recycling%20Estates%20and%20E-waste.pdf>)

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

Response:

It will be essential to provide education resources to the community to understand the costs, health and environmental effects, and engage with the scheme. It may also be necessary to provide legislative drivers including fines for incorrectly disposing of e-waste. Also, some incentives may be provided such as a deposit at point of sale which is returned when the item is presented for recovery or recycling. However it should be noted that local government would not be able to provide this alone, given the move towards the rate-capped environment and the already challenging education needs they resource to cover broader recycling. Given that most Waste and Litter Strategies last for a period of at least 4 years, if e-waste education programs and recovery projects are going to be included, it would be necessary to allow time for the cycling of these strategies to the subsequent strategies to occur. Those councils with strategies in place or expiring in the next 2 years would be unlikely to be able to include e-waste as a major aspect; this will not be fully possible until the details of the landfill ban are known, and even then the lag time could be 3 or 4 years for councils who adopt a new 4-year strategy immediately before the landfill ban takes place. Therefore to support the community, local government will need to remain involved to be able to forward plan for the ban, thus reducing the lag time for being able to support the community via commitments made in Waste and Litter Strategies.

As discussed earlier, it is essential that any scheme is well understood, engaging, has a range of positive and negative incentives, and be as easy as possible for consumers to access.

## 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.

Response:

Illegal dumping is likely to increase. In ACT where a ban on computers and television was implemented in 2005 and 2010 respectively, the bans where combined with a service fee payable by users to recycle these items at resource recovery centres. It was found that a small but significant volume of computer and television e-waste was dumped illegally in parks and on nature strips. A much larger volume of e-waste has been left at the many charity bins in the ACT for collection, little of which on inspection has been re-useable or re-saleable. Where e-waste was dumped at charity bins or shops the fees were waived. In ACT from May 2010 to April 2012, the contract costs for recycling both televisions and computers reached an estimated $1.41 million. Fee income over the same period reached $833,000. The shortfall of $582,000 is significant, but to some extent explained by the tonnage of computer and television e-waste where fees were waived or unable to be collected (Source: <http://www.audit.act.gov.au/auditreports/reports2012/Report%20No.%205%20Management%20of%20Recycling%20Estates%20and%20E-waste.pdf>).

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

Further consultation with local government is needed to be able to effectively answer this question.

# **7 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?

No response is provided for this question, some examples have already been cited in the discussion paper and some previous responses.

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