

28 October 2015



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Department of Environment, Land, Water and Planning
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To Whom it May Concern,

SUBMISSION ON THE E-WASTE DISCUSSION PAPER

On behalf of the City of Melbourne, thank you for the opportunity to comment on the discussion paper, on managing e-waste in Victoria. Our submission is attached, including the cover sheet as requested.

If you require further information about our submission please contact Melanie Oke, Waste Management Coordinator on 03 9658 9951.

Yours sincerely

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Customer reference

CoM reference 9490670

Managing e-waste in Victoria – starting the conversation

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
- By post to: Waste and Resource Recovery team
Department of Environment, Land, Water & Planning
PO Box 500
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Fields marked with an asterisk (*) are mandatory.

Contact Details

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I am making this submission on behalf of * (please specify one of the following) Individual <input type="checkbox"/> Non-government organisation / community organisation <input type="checkbox"/> Business <input type="checkbox"/> Local Government <input checked="" type="checkbox"/> Other government entity <input type="checkbox"/> Other: _____ Name of organisation (if applicable): _____ City of Melbourne _____	

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- Quote directly from your feedback in the DELWP response to feedback and subsequent regulatory impact assessment.
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City of Melbourne submission on the e-waste discussion paper

Responses to the questions posed in the discussion paper are included below.

What is e-waste?

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

The proposed definition of e-waste is clear but the reference 'without the intention of re-use' should be removed. The inclusion of this caveat suggests that if the owner discarded an item with the intention of re-use then it isn't 'e-waste' and therefore could be sent to landfill. This may result in unintended consequences, e.g. items that are 'donated' to charity stores but which cannot be re-sold could then be sent to landfill.

The proposed definition doesn't seem to include light globes/tubes from fixed lighting (e.g. within a building), but these are included in the categories. If light globes are to be included within the ban the definition may need to be changed to clarify this.

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?

There are two elements that need to be better defined within the categories:

- a) size - 'large appliances' includes items as small as microwaves (able to be lifted by a single person) and as large as refrigerators and washing machines. Similarly, 'electrical and electronic tools' ranges in size from small (drills) to large (lawn mowers). The size of an item will to some extent dictate the collection method that can be used, so some type of 'sub-categorisation' may be needed to communicate to the general public about what they should do with a particular type of item.
- b) hazard / risk - this may also dictate the collection system that can be used. For example, small appliances may be able to be included in kerbside recycling collections but compact fluorescent light globes would not be able to as they would break and become a hazard.

The categories should be understandable to the general public and should assist in communicating the landfill ban and alternative disposal methods to them. The national computer and television recycling scheme has established an artificial distinction between TV and computer e-waste and other e-waste. The community want to be able to recycle all types of items.

The following items are not explicitly included in the categories in the discussion paper and should be included somewhere:

- halogen lights
- loose batteries
- battery packs or chargers
- DVDs, compact discs, tapes/cassettes.

- cameras
- stereo equipment
- tablet devices

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?

No comment

Q 4: What do you see are current and future impacts of e-waste on the environment or human health? Can you provide examples?

There may be environmental or health impacts created by the e-waste ban if collection systems are not designed and implemented correctly. Health and safety of the general public and of contractors and staff that are collecting or transporting the e-waste items must be considered.

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

No comment

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

Currently, the barriers to e-waste recovery within the City of Melbourne include:

- lack of collection systems for most e-waste items
- difficulty for residents to access collection systems where they do exist - e.g. low car ownership rates for residents within high-rise buildings means it is difficult for them to access drop-off locations in neighbouring municipalities
- community awareness/ knowledge of available collection systems
- relative ease for residents to dispose of items to landfill rather than seek out a recycling option
- cost of collecting e-waste as a specific waste stream, e.g. e-waste items collected in the hard waste collection are collected in a rear-load compactor vehicle; only whitegoods and mattresses are collected separately for recycling.
- cost of recycling/processing vs. disposal to landfill.

These barriers need to be addressed as part of the development of the landfill ban.

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?

As a local government it can be difficult to obtain information on the e-waste recycling market, particularly on what happens to items/materials once they are past the initial deconstruction stage.

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

No comment

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

The initial purchase price of an electrical or electronic product may influence the disposal behaviour once the item is no longer needed. Some categories of e-waste have very cheap products available (such as small household appliances). These cheap items may be readily disposed of to landfill once they are old or worn. On the other hand, expensive items are valued by the individual and kept beyond their useful life. For example, a smart phone which has been replaced by the user when a new model is released may be stored for many years as the owner is unwilling to part with an item that cost them a substantial amount of money.

What are the outcomes government wants to achieve?

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

The outcomes that are achieved will depend on the collection and recycling systems that are established. The outcomes of the South Australian landfill ban may provide a valuable learning experience. More information on the implementation and outcomes achieved should be provided.

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

No comment

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?

The difficulty of collecting, transporting and recycling should be considered as a criteria determining how the different types of e-waste are managed.

Designing the approach- timing

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

No comment

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

There are a number of changes that will need to occur in metropolitan Melbourne in preparation for a landfill ban:

- establishing a funding scheme to cover the additional cost of collection and recycling
- establishing convenient collection systems that are as easy for the user/customer as disposing of the item to landfill
- community education on what items are to be banned and how they can access the new collection systems.

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 phased approach may be beneficial in that it would allow collection systems and recycling capacity to be established gradually but it will make it more difficult to communicate the ban to the general public - a blanket ban may be simpler to explain.

If a staged approach is to be taken it should consider the ability to use existing collection infrastructure (e.g. small appliances / items such as mobile phones could be included within the kerbside recycling system if support is provided to MRF operators to enable them to sort this new waste stream) as well as the market viability and local recycling capacity.

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?

The principle of 'polluter pays' or in this instance, 'producer pays'/extended producer responsibility should be included as one of the principles to guide the design of the landfill ban. The cost should not have to be borne by local government, particularly given the pressures being placed on the sector by rate capping.

Another principle that should be considered is 'easy as the alternative' - that is, it must be as easy to recycle the e-waste items as it is to send them to landfill.

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?

Residents, SMEs and large commercial enterprises need to have easy access to collection systems for banned e-waste items. For the City of Melbourne and many other municipalities it will not be adequate to rely on residents taking their items to a transfer station. Other collection systems need to be used. Some options that could potentially be used are as follows.

- MRFs could be upgraded to sort small e-waste items, allowing existing kerbside collections to be used
- major retailers/supermarket chains could establish drop-off points
- public drop-boxes similar to charity drop-off bins may be used

- specialised e-waste bins could be installed within each high rise apartment building
- hard waste collections could use an extra truck to collect e-waste for recycling.
- in some councils it may be practical to use existing recycling bins for larger e-waste items on specified dates throughout the year (such as the 'day after collection' model used by Moonee Valley City Council's Renew program).

Many of these collection options would require funding support for their establishment and on-going implementation.

Data and reporting systems will be needed to track progress, establish the success of the ban and provide feedback to the general public.

A state-wide campaign will be needed to educate the public about the ban. This campaign should draw on the success of previous large-scale regulatory changes such as the introduction of mandatory bicycle helmet use.

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

No comment

Designing the approach – other considerations

Q 19: What unintended consequences do you think the landfill ban could cause?

The landfill ban may result in an increase of contamination within household recycling streams if the appropriate collection systems are not put in place and communicated appropriately to users.

The ban may also result in increased cost for local governments if there is no funding model to support the ban.

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

The design of the approach must include detailed consultation with local government to ensure the collection systems will work, a funding model to support implementation and a state-wide community education and behaviour change program.

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?

Local governments may be able to provide information on the success of different types of e-waste collection systems.

The City of Melbourne has provided an annual e-waste drop-off collection day for the past 5 years. Data on the number of attendees, post code and amount of material can be provided if this would be of use. We are currently establishing a trial of e-waste collections from 10

high-rise apartment buildings. One or more 240L or 660L bins will be placed in the waste/recycling areas of each building and will be advertised to residents through existing building communication channels (e.g. building Facebook pages), posters in common areas and a letter-box drop. The results of the trial can be provided in early 2016.

The City of Yarra has recently established a number of communal e-waste drop boxes similar to charity bins. It would be interesting to see the results and costs of this initiative.

Other comments

Adequate support and funding must be provided to all local governments for the establishment and on-going provision of collection systems. Further consultation with local government on the logistics of establishing and maintaining an e-waste collection system is needed before a regulatory impact statement is prepared on any given option.

In developing the approaches to banning e-waste from landfill it will be important to establish how this will be monitored and enforced, who would be penalised if e-waste is disposed of to landfill and what the penalty would be.

E-waste from the commercial and industrial sector may be difficult to identify in scope and scale and to establish collection systems for. Clarification is needed to identify who will be responsible for developing and implementing collection systems for commercial e-waste, particularly for small-to-medium enterprises.