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Department of Environment, Land, Water and Planning  
PO Box 500  
EAST MELBOURNE VIC 8002

To whom it may concern,

### **Proposed E-Waste Landfill Ban Submission**

Golden Plains Shire Council is supportive of the e-waste landfill ban in principle as Victoria works towards recovering valuable resources and diverting waste from landfill. Council has some concerns about the implementation and ongoing management of the proposed e-waste landfill ban, which we would like to be addressed when moving forward with the ban.

*Costs to provide collection services:* There are concerns about Council's long-term ongoing operational costs of providing services to the community to be able divert e-waste from landfill. The costs to provide such a service include but are not limited to infrastructure, transport, processing, wages, education campaign and management of dumped materials in response to the ban. The transport and processing costs will not be covered by the proposed funding, therefore it will be shifted to Councils and regional Councils face significant transport costs due to longer travel distances.

*Infrastructure requirements:* Council also has concerns that the initial State Government funding to deliver an infrastructure program to ensure collection sites are compliant may not be sufficient. The infrastructure requirements may be significant in order for sites to comply with the standard and in some cases there may be space and access restraints to enable separation of e-waste. There is uncertainty about how to store e-waste, given each processor has specific requirements for delivery to their site. The variation in the extent of e-waste items and how they will be separated, stored and then processed accordingly is unclear.

*Community access to collection services:* The distance people will be required to travel in regional areas in order to access a collection service will be a major barrier in their participation. The current program is primarily focused on Resource Recovery Centres/Transfer Stations, however there has been minimal focus on alternative collection points. Consideration needs to be given to other collection sites in order to reduce distances people would be required to travel in regional municipalities. Suggestions of locations include retailers, shopping centres, schools, community groups and mobile collections.

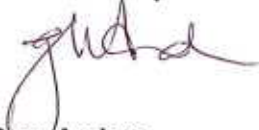
*Compliance:* Further clarity around compliance is required as there has not been clear direction on where responsibility for compliance of the ban will lie. It would be unreasonable for Councils to be required to ensure compliance in their municipal kerbside collection bins. Furthermore, no information has been provided on whether penalties will be issued for non-compliance.

*Education:* Council has concerns that the State Government funding to deliver an education program may not be sufficient. The education campaign must be well communicated to regional areas as they have the greatest barriers, such as distance, to access an e-waste collection service. The expansion of e-waste to include items other than computers and televisions will need to be conveyed to the community. Council cannot be left with the burden of funding and delivering the education program, as regional Councils are already under resourced in waste education.

*Market:* Council lacks confidence in the sustainability of the end market for e-waste materials once processed. The market is influenced by a number of factors, such as supply/demand, market value, commodity prices, costs and regulations. There needs to be research and investment into these factors to ensure long term viability of the recycling process. The influx of large volumes of materials when the ban commences may not be able to be adequately managed by reprocessors, leading to stockpiling and turning away product. Regional Councils with small volumes of materials need certainty around their volumes being accepted by reprocessors.

Council hopes that our concerns are adequately addressed prior to the implementation of the e-waste ban.

Yours sincerely



**Greg Anders**  
**Director Assets and Amenity**