

E-Waste Landfill Ban – SKM Submission

1 About SKM Recycling

This submission has been prepared by SKM Recycling (**SKM**). SKM welcomes the opportunity to make this submission in relation to the Victorian Government's proposed approach to managing electrical and electronic waste (**e-waste**) in Victoria.

SKM is a wholly Australian-owned recycling company, operating resource recovery facilities across Victoria as well as in South Australia, New South Wales and Tasmania. SKM has been successfully operating in the resource recovery industry for more than two decades and is proud of the contribution it has made to innovations in recycling and improved environmental outcomes.

SKM provides recycling services to local councils, government departments, and other commercial/industrial businesses. SKM buys under contract and sorts recycled (commingled) materials that are placed into kerbside recycling bins, which are on-sold for reprocessing as feedstock into a new and diverse variety of products.

SKM's clients include manufacturing facilities such as paper and cardboard mills, glass and plastics manufacturers. SKM's purpose-built Material Recovery Facilities (MRFs) enable SKM to produce the highest product quality specification levels of recyclable materials.

By diverting recyclables from landfill, SKM performs an essential public function, assisting government and businesses to meet their environmental targets.

However, recycling bins are commonly seeing the inclusion of e-waste in them, and although SKM is the recipient of e-waste, it does not have the specific infrastructure to recycle or process e-waste.

As an industry-leader in recyclable processing, SKM shares the Victorian Government's interest in upgrading Victoria's e-waste collection network to ensure that e-waste can be managed and recycled appropriately. We have prepared this submission to provide SKM's views on how e-waste is affecting recyclers, such as ourselves, and to provide our suggestions for diverting e-waste from landfills, based on our experience in the industry. In that respect, we set out SKM's submissions in response to the Victorian Government's proposed e-waste policy package below.

2 Response to the Government's policy package

2.1 **Separate collection stream for e-waste**

At present, without a separate waste collection stream for e-waste, a significant amount of e-waste is incorrectly placed in kerbside recycling bins.

Materials Recovery Facilities (**MRF's**) configured to process kerbside recycling materials cannot process e-waste, and recyclers must therefore remove e-waste from the kerbside feedstock and seek to on-sell to e-waste recyclers where feasible or divert it to landfill, along with other surplus materials which cannot be recycled. As the Victorian Government has identified, and SKM agrees, this is not an optimal outcome.

While SKM welcomes the proposal for a ban on e-waste to landfill, SKM is concerned that, without appropriate controls and the creation of a new and separate e-waste collection stream, a ban may have unintended flow-on effects in terms of the quantum of e-waste placed in kerbside recycling bins. As a consequence, this would in turn have negative impacts on the recycling industry. In particular:

- (a) Increased levels of e-waste in kerbside feedstock would reduce the efficiency of the recycling process by requiring additional sorting and removal of e-waste, and by increasing the cost-burden on commingled recyclers to dispose of any e-waste removed from the kerbside feedstock.
- (b) Without the proper identification of e-waste recyclers, who should be made to comply with certain performance standards, it is difficult to determine who is an appropriate e-waste recycler to divert e-waste to for recycling, repurposing or processing. Until clarity around this matter is in place in the public's mind, the responsibility and cost burden of e-waste rests with business like SKM as facilities like ours are inevitably the place that e-waste finds its way to.
- (c) E-waste contains volatile and sometimes hazardous contents; with increased quantities of e-waste in kerbside recycling feedstock an increased risk of an auto-ignition fire during the collection and recycling process occurs. Batteries in particular are a prime potential source of fires in the loads within collection vehicles, which can impact MRF's if loads are delivered without any fire issue being detected or dealt with prior to unloading at the MRF.

Further, SKM recognises that there is a potential value in e-waste being recycled and/or repurposed, and such potential is not realised when e-waste is sent to landfill.

For the above reasons, SKM's view is that e-waste should be collected as a separate waste stream from residents at kerbside collection. This system infrastructure requires both the support of the State Government and local Government and should be implemented along with an education campaign and hardware collection vessel (such as a tub) by local Councils in line with other collection streams. The processing, recycling, disposal contracts from the e-waste stream should be considered to appropriately set suitable protocols, standards and controls for this collection process to ensure that the system runs with the greatest efficiency.

SKM is supportive of the Victorian Government's interest in potentially investing in measures to collect e-waste as a separate waste stream, including kerbside collection, permanent drop-off points and mobile/temporary collection events. SKM submits that, of the above measures, kerbside collection should be favoured, given the greater likelihood of compliance.

2.2 Draft Waste Management Policy (E-waste) 2018

SKM has reviewed the *Draft Waste Management Policy (E-waste) 2018 (Draft Policy)*. SKM is concerned that, as currently drafted, the Draft Policy would place an undue regulatory burden on non-e-waste recycling operators, such as SKM.

In particular, the current drafting of the definition of 'e-waste service provider' could potentially capture recyclers such as SKM, who do not seek e-waste material (and in fact expressly exclude e-waste from specifications as to what is allowable in a kerbside recycling bin), and are not set up for the purpose of accepting e-waste for collection, storage etc. Rather, SKM only accept e-waste by default as a result of the improper placement of e-waste in kerbside recycling bins.

The record-keeping and other obligations placed on e-waste service providers under clause 7 of the Draft Policy are onerous, and would place an undue cost burden and limit the efficient operation of non-e-waste recycling plants.



Accordingly, SKM submits that non-e-waste recycling facilities should be specifically excluded from the definition of 'e-waste service provider' in clause 5 of the Draft Policy. SKM welcomes further consultation on resolving this issue, if this is of assistance.

2.3 E-waste education and awareness

SKM is similarly supportive of the Government's commitment to e-waste education and awareness. In our view this is essential and should follow from the same education campaigns for kerbside recycling.

Within the educational programs that SKM conducts in partnership with Councils, the correct handling of e-waste (and other items not to be placed in the kerbside recycling bin) is discussed and addressed. In tandem with regulatory measures, SKM believes this is integral in encouraging recycling, and preventing e-waste ending up in landfill, and instead at an appropriately qualified e-waste recycling facility.

We understand the Government intends to develop initiatives which educate people about what constitutes e-waste, why it should be kept from landfill, where to recycle it and what the legal obligations are under any new regulations. SKM is in full support of this initiative.

In support, SKM proposes that some key messaging themes should include:

- educating on fire hazards borne from disposal of e-waste items in the recycling bin when collected (e.g. batteries, general waste etc.);
- the value of recycling/the idea that each waste stream should be separated;
- de-bunk myths around what actually happens to recycled products once collected; and
- educating households about what should and shouldn't go in the kerbside recycling bin (what is/isn't e-waste).

SKM supports the appropriate management of e-waste and welcomes the opportunity to discuss anything our submission.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Terry Van Iersel', is written over a light blue horizontal line.

Terry Van Iersel
Manager Sales & Commodity Trading

