

BARWON SOUTH WEST LOCAL GOVERNMENT WASTE FORUM

C/- PO Box 82, Belmont, Vic., 3216

Waste and Resource Recovery Team
Department of Environment, Land, Water and Planning
PO Box 500
Melbourne VIC 8002

17 January 2018

To whom it may concern,

Re: Proposed E-Waste Landfill Ban Submission

The Barwon South West Local Government Waste Forum (Forum) wishes to provide a submission to the Victorian Government, regarding the proposed approach to managing electrical and electronic waste or 'e-waste' in Victoria.

The Forum represents nine local governments from across the Barwon South West Region including:

- Borough of Queenscliffe
- City of Greater Geelong
- Colac Otway Shire Council
- Corangamite Shire Council
- Glenelg Shore Council
- Moyne Shire Council
- Southern Grampians Shire Council
- Surf Coast Shire Council
- Warrnambool City Council

As councils are key stakeholders in the proposed e-waste landfill ban, we all appreciate the opportunity to make this submission, on the preferred policy information. All councils are supportive of the e-waste landfill ban in principle as it is the intention of the region to recover more valuable resources and divert waste from landfill; albeit ensuring that there is no impact on the environment and human health.

At the Waste Forum on 10 November 2017, it was agreed to develop a submission on behalf of the Local Government Waste Forum, outlining the many concerns of the proposed E-waste landfill ban in the region.

The Forum, on behalf of the Councils, utilising a regional outlook, wish to present the following issues and concerns that are likely to have an impact on regional and rural municipalities.

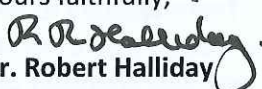
- **Policy and cost:** There is concern about the long-term ongoing operational cost implications to councils, of providing services that comply with the new requirements, for example: education, receipt, storage, handling, etc. Another issue is the costs associated with diverting e-waste from landfill to reprocessors, for example transport and processing will not be covered by current funding allocated to e-waste support measures, thus shifted to councils. Regional/rural councils face significant transport costs to forward e-waste to reprocessing facilities. Councils will be required to fund the long-term infrastructure replacement costs (20+ years). There may be a risk to councils for e-waste ending up as illegal dumping, and as such further costs may be required to manage this increased unwanted activity. There appears to be no discernible benefit in an increasingly constrained economic environment, where local government is expected to maintain service delivery. Landfill operators face apprehension of future ban enforcement and resultant obligations under BPEM guidelines and it is hoped that this is clarified in due course.

- **Infrastructure:** The initial capital funding investment by State Government to deliver an infrastructure program that aims to provide enough adequately-equipped and compliant collection sites, may not be sufficient. In rural and regional areas, the infrastructure requirements may be considerable, therefore to comply with the standards -all existing facilities may need to be upgraded, rather than just a major network. Some councils have indicated that if funding is not allocated (as minor sites have not yet been assessed) they may consider to not provide or reduce e-waste collection services, in rural areas. Many existing sites are constrained due to many reasons, and the capacity of the site to cater for increased activities may be limited. Many councils are unsure as to how e-waste may be separated and stored once received, along with the variation of e-waste items received. Some councils in the region operate landfills, hence will have to administer additional requirements to ensure compliance with the e-waste landfill ban.
- **Education:** The education campaign must be well communicated to regional and rural areas as they have the greatest barriers, such as distance to get to an e-waste collection point. There may be too much reliance on councils for education, which many councils do not have the appropriate resources to deliver accordingly. It is not yet evident how the community will be convinced/encouraged to go to an e-waste disposal point, especially for small items on an occasional frequency. The expanded definition of e-waste, beyond the general current collection of computing equipment and televisions, means that there will need to be a comprehensive education program for the entire community.
- **Social enterprise:** Regional social enterprises/not-for-profit organisations must be supported, as their e-waste collection and reprocessing operations minimise the costs for many council areas.
- **Access:** Convenient access to an e-waste collection service is one of the biggest barriers to effective behaviour change, therefore all existing facilities should be upgraded accordingly. The level of access in rural areas where the barriers are greater, should be equal to or greater than that of metropolitan Melbourne.

The collection of e-waste is currently focussed on council resource recovery centres/transfer stations. Given the location of many of these facilities in rural and regional communities, it is likely that a sizeable portion of the community may not be able to access these e-waste collection points with ease. There appears to be little consideration for any other alternatives at this point, therefore, a suggestion from the Forum is to ensure an equitable cost structure and access level across the state. Also suggested by the Forum is that e-waste disposal by the community should be at no cost, and the State government should pay for transport of e-waste to the reprocessing facility, and consider administering regional / local community e-waste collection events. The Forum also advocates for a broader product stewardship scheme, that covers all e-waste, not just TVs and computers.

The Forum hopes that the issues and concerns expressed in this submission are considered accordingly, and that a fair and accessible e-waste landfill ban and associated policy are effectively implemented.

If you have any queries regarding our submission, please do not hesitate to contact me on Mobile: 0427 573 672.

Yours faithfully,


Cr. Robert Halliday

Chair

BSW Local Government Waste Forum