

## **Victorian Government e-waste landfill ban Stakeholder submission by the Australian Refrigeration Council**

The Australian Refrigeration Council (ARC) welcomes the Victorian Government's approach to managing e-waste, and supports the proposed ban from landfill and investment of \$16.5 million in measures to ensure this policy is effective.

Our concern and interest lie with ensuring materials recovery (refrigerant) from end-of-life e-waste (refrigerators and air conditioners) is performed legally and safely, as required by Australian laws and regulations. Materials recovery from e-waste is a key piece of the Government's environmental policy package.

### **About ARC and the issues**

The ARC administers a national, mandatory licensing and compliance scheme for the handling, trade and recovery of refrigerants that are ozone depleting substances (ODS) and synthetic greenhouse gases (SGG) on behalf of the Department of the Environment and Energy.

These refrigerants are used in approx. 90% of refrigerators and air conditioners (RAC). If released into the atmosphere, ODS and SGG refrigerants can damage the ozone layer and contribute to global warming. It is also illegal to discharge ODS and SGG refrigerant.

At the end of their working life, up to 80% of RAC systems still contain refrigerant. A 2015 Deloitte report commissioned by the Department of the Environment suggested that only 30-40% of refrigerant is recovered from end-of-life domestic refrigerators and freezers before they are sent to recycling/landfill. This, coupled with air conditioners, equates to over 200 tonnes of refrigerant illegally dumped and potentially discharged into the atmosphere each year.

To ensure refrigerant isn't released from end-of-life RAC systems during kerbside pick-up and recycling/disposal, refrigerant recovery should be performed. Only ARC licensed technicians and authorised businesses are legally able to perform these services. To further encourage recovery, a rebate is paid (currently \$3 per kilogram) for the deposit of the refrigerant (based on weight) by Refrigeration Reclaim Australia (RRA).

### **What's at risk?**

Refrigerators and air conditioners are categorised as 'e-waste – large appliances'. As the 'Managing e-waste in Victoria - Policy Impact Assessment' states, "the most significant category of e-waste generated in 2015, in terms of volume, was the large appliance category. This includes refrigerators and air conditioners."

With the ban on e-waste at landfill starting from July 2018, there is a need to ensure that the new and existing pathways refrigerators and air conditioners will now take, include individuals and businesses with the capacity to legally recover and store regulated refrigerants. Without these processes in place, the risk of refrigerant being discharged into the atmosphere is significant. This will impact on Australia's contribution to its obligations as a signatory to the Montreal Protocol on Substances that Deplete the Ozone Layer. In addition, under the *Ozone Protection and Synthetic Greenhouse Gas Management Act (1989)*, penalties of up to \$63,000 for individuals and \$315,000 for corporations can apply for discharging refrigerant.

## **ARC comments on proposed regulatory and non-regulatory measures**

### Regulatory measures

Waste Management Policy (E-waste) 2018:

*7. Requirements for e-waste service providers* – There should be a reference highlighting that e-waste service providers must have the appropriate (legal) licensing and qualifications to perform the services they are required to perform, to compliantly and safely 'maximise the recovery of output materials from e-waste' (Section 6, (3), (b)).

Specific to refrigerant recovery, if e-waste service providers are recovering refrigerant from refrigerators or air conditioners, they will need the appropriate licence and authorisation from the Australian Refrigeration Council to legally perform these services.

### Non-regulatory measures

E-waste infrastructure support program:

For all existing and new facilities that will be responsible for pick-up, transport, storage and handling of e-waste (refrigerators and air conditioners), there will need to be individuals and businesses appropriately licensed and authorised with the ARC available to ensure the legal and compliant handling of regulated gasses during recovery from these systems.

E-waste education and awareness campaign:

Because refrigerant emissions from end-of-life refrigerators and air conditioners is a risk from kerbside collection, to delivery at a transfer station, there is a need to educate all stakeholders in this chain on the risks and correct handling and recovery of refrigerants.

## **How ARC can assist the Victorian Government**

As a national regulator for the handling and trade of refrigerants, ARC works collaboratively with all states and territories to ensure national and state regulations that cross into the management of refrigerants (safety, consumer protection, environment) are complied with. This includes conducting compliance and education/awareness activities.

ARC would welcome the opportunity to assist the Department of Environment, Land, Water and Planning and Sustainability Victoria in ensuring the e-waste landfill ban and associated policy initiatives are implemented successfully.

Please visit [www.arctick.org](http://www.arctick.org) to read more about the ARC and feel free to contact ARC CEO Glenn Evans if you have any further questions about the submission:

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