

# Ewaste to landfill ban legislation response

Cardinia Shire Council  
January 2018

Officers from Cardinia Shire Council attended a workshop on the 15 November 2017 hosted by MWRRG which included some feedback provided to SV and EPA. I would refer to the outcomes of this meeting, attached.

I would also direct support to the response developed by MAV, which Cardinia Shire Council are supportive and in line with, attached.

We support the principal of collecting and recycling ewaste, rather than sending to landfill. We do, however see a number of issues that arise within the proposal, which mainly stems from not providing adequate time to implement a well thought out program. Council make the following comments:

- The proposed time frame for delivery is inadequate for an effective program, and roll out of infrastructure.
- The suggested first step is to commence the “ban” by a ban of product stewardship scheme products to landfill first ie TV computers, mobile, batteries. The results of the infrastructure assessment should be received and then plan a 2-3 year implementation of the rest with time to roll out the full scheme.
- More needs to be done/planned to advocate retailers as a collection point to ensure a social responsibility front, prior to the ban. This is a huge gap in the proposed roll out, and its omission puts the responsibility mainly to Councils.
- When there is a lack of infrastructure, the community will contact their local Council, which will be a strain on current resources and difficult when there may not be adequate responses/services.
- There is significant practicality issues of the legislation around ewaste being transported properly. Cardinia Shire currently collect ewaste via a compactor truck which is sent to landfill. This system will not be satisfactory under the new proposal. There will need to be a separate different model truck sent out to collect maybe one or two small items, which is not cost effective and will result in more carbon emissions. Cardinia is the second largest municipality (geographical area) in Metro Melbourne and some areas are remote.
- We have a large proportion of families. Collection of small ewaste items (flashing toys or electric toothbrushes) will be a problem, and produce low quality and value recyclable material. Using current collection systems (hard waste collection), it will be difficult to capture these items. This is why the collection points at retailers is crucial, however the state government has overlooked these options. More time needs to be provided to deliver these options.
- There will be a lot of extra “ewaste” produced through the hard waste service. Has studies been done into this?
- What will be the implications to second hand shops/op shops? It could be expected they will no longer wish to take anything battery operated or electrically charged due to the liability, which will potentially result in more waste for Councils to deal with.
- More investment needs to occur by the State Government in this program, to support the start up and running costs for Councils in the early years, until contracts are bedded in and markets are established, and assumingly costs come down.
- There is insufficient funding for a wide reaching education campaign - \$1.5 M will not be enough for the type of campaign required to make it really effective. Councils can put an article in its magazine and on facebook, but this will not be sufficient when research shows the community do not know what ewaste is. This must be reviewed.

- There needs to be contingency for market failures including planning for low value material stockpiling, and ability to apply for exemptions should this occur.
- There appears to be limited support for Councils that do not have a transfer station to establish systems within privately run transfer stations and other sites, and retailers. Cardinia does not have a transfer station, but collection systems need to be established.
- Due to the tight timeframes, Council needs to plan for and budget for this ban now, even before the final legislation or infrastructure assessment is announced . Our current collection contractors are not sure of the full implications, including financial as the “final legislation has not been announced”. We anticipate increased potential costs as:
  - Increased volumes/tonnages collected in our blanket hard waste services resulting in extra collection and processing costs
  - Considerable increased costs to our dumped rubbish service, with a new truck type being required by our contractor, and additional runs to collect ewaste from localities. We will also be expecting extra dumped rubbish due to the high cost low convenience alternatives likely to be available. We will not be able to plan ahead on this due to the timeframes, and will rely on variations to our contract, which will be costly.
  - Exploration on how to address the small electrical item issue. Our current blanket hard waste will not be ideal if a resident wishes to place out 1 X electric toothbrush or soft flashing toy. We will need to look at other options for drop off points, as we are not confident there will be cheap convenient options for our community.
  - Education costs – our hard waste flyer will likely need to be expanded with more explanation of the ewaste service.
  - The costs are predicted to be \$175000 for 2018/19

We understand that the EPA have advised they are unlikely to be going to the compliance phase straight after implementation, especially if infrastructure is not yet in place. We believe that proceeding to a ban without the services or infrastructure in place undermines the whole program. A good proportion of our community will want to comply straight away, and will be making Cardinia Shire accountable. If infrastructure or services are not in place, they will be looking to someone to assist them to do the right thing, and it will their local Council. They will also be seeking a convenient and cost effective option for recycling, preferably free.

We urge this proposal be reconsidered to commit to a 2-3 year implementation period. The results of the infrastructure assessment should be received and then planning commenced for a 2-3 year roll out the full scheme, considering the points made in this submission.