

24 January 2018

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

Dear Sir/Madam

Managing e-waste in Victoria – MRI E-cycle Solutions submission

MRI E-cycle Solutions welcomes the opportunity to share its views about managing e-waste in Victoria.

This submission seeks to highlight some of the key issues affecting how e-waste is collected, transported, stored and recycled in Victoria. We also plan to submit a more specific response to the proposed regulatory measures by 1 February 2018.

MRI E-cycle Solutions is supportive of the e-waste landfill ban as currently proposed by the Victorian Government and we endorse the definition of e-waste which we note includes batteries.

We believe that if the ban is adequately resourced, promoted, monitored and enforced, it will:

- divert more e-waste from landfill;
- maximise resource recovery;
- ensure responsible recycling;
- grow employment opportunities; and
- support positive social outcomes including greater involvement of social enterprises

As a long-standing and highly-experienced e-waste and battery recycler and approved co-regulatory arrangement that operates under the National Television and Computer Recycling (NTCRS), we believe that effective education and awareness is essential to making the landfill ban understandable, viable, durable and successful.

We trust that the following points will assist the Waste and Resource Recovery Team to further refine and adjust the policy package.

- **Product scope**
We support the comprehensive definition of the proposed product scope. This will reduce confusion in the community in terms of what is prohibited. It will also directly improve the economies of scale due to the likely scale of volume that will result.

However, there needs to be much more clarity about batteries in the definition. Specifically, it needs to be definitive that the ban applies to standalone batteries irrespective of their chemistry (i.e. do not need to be part of a product).

Banning all electrical and electronic products with a plug or battery will help to directly and indirectly support the required industry development and associated investment in new and/or expanded e-waste collection and recycling services and facilities. This includes local processing for batteries and circuit boards in a safe, ethical and environmentally sound manner.

- **Collection and storage infrastructure**

From our experience gained in operating a co-regulatory arrangement (Dropzone by MRI) under the NTCRS, and servicing a national battery recycling program, it is evident that the current collection infrastructure available (i.e. collection units and trucks) is not designed to adequately handle e-waste and batteries safely, prevent breakage, or optimise resource recovery.

There is a clear need to invest resources to develop a series of standardised collection units specifically for e-waste and batteries. This will result in numerous safety and environmental benefits as well as potential cost savings in collection, transport and recycling.

Specifically, the units need to be able to prevent damage to the product, keep the product dry, can be easily moved on-site and transported, meet the differing needs of metropolitan and regional collection sites as well as recyclers needs in terms of sorting, handling and storing.

Likewise, many existing NTCRS collection points in Victoria do not meet the AS/NZS 5377 standard in terms of being on a hard stand and keeping e-waste weather-proof. Providing resources to upgrade these non-conforming collection sites to meet these requirements is essential from a health and safety perspective, as well as a resource recovery and environmental protection perspective.

The collection infrastructure work undertaken by the NSW Government to establish Community Recycling Centres across the state has gone a long way to improve sites to conform to AS/NZ 53377. There are many learnings from this program that the Victorian government should draw on in terms of design, costs and implementation.

Additional infrastructure that will be required to improve the safe handling of e-waste includes forklifts, collection unit lifting devices, conveyors and sorting equipment.

E-waste and batteries are very different to bottles, cans, garden and food waste. If the Victorian Government wishes to optimise resource recovery and maximise reuse then the collection approach must protect the integrity of the end-of-life electrical and electronic products, including those using batteries.

The requirements for safe handling also needs to be considered in the form of training and education of staff at collection / aggregation points around health and safety issues including:

PLEASE NOTE: Many types of battery are deemed to be prescribed waste, with transport and storage methods controlled by the various state EPAs. Dangerous goods transport may therefore be required. Please contact us for advice regarding storage methods or the supply of compliant drums/bins

- non-compaction of product for transport,
- correct aggregation and storage of batteries to minimise possibility of short circuit.
- correct collection and storage of lamps to avoid breakage, and that transport and storage issues impact not only operators but also downstream operators.

- **Community access / collection network**

We support the work that Sustainability Victoria has been doing in assessing the current collection networks. However, we would have welcomed the opportunity for MRI E-cycle Solutions to share with the consultants, considerable data and information about our public collection network 'Drop Zone' which includes both local council and retail collection points.

We consider it vital that the Victorian Government work in close collaboration with all NTCRS Co-Regulatory Arrangements in designing an efficient and accessible free collection network. By bringing the four arrangements together to work collaboratively with Government there is a real opportunity to leverage industry and government funds, and prevent unnecessary duplication or inferior service outcomes, particularly in regional Victoria.

We cannot emphasize enough our desire to work collaboratively with the other NTCRS Co-Regulatory Arrangements and the Victorian Government in sharing the costs to improve the collection network. There is an obvious opportunity to design and create innovative collection models that are more efficient than the traditional waste and resource recovery methods.

It would be disappointing to see the Victorian Government invest in a collection network that does not integrate and work collaboratively with the NTCRS collection network to improve access and efficiencies.

- **AS/NZS 5377**

The application of the e-waste standard AS/NZS 5377 as part of the policy package is essential and provides an independent and auditable system for helping to ensure environmentally sound collection, storage, handling and recycling of e-waste.

AS/NZS 5377 is cited in the Commonwealth Regulations for Television and Computers and we welcome that it is directly referenced in the regulatory and non-regulatory measures to ensure harmonisation and uniformity, especially in relation to collection, aggregation, transport and processing of e-waste.

Many local councils in Victoria acting as collection sites under the NTCRS do not currently meet the requirements of AS/NZS 5377, which highlights an obvious area of support that could be provided by the Victorian Government.

- **Awareness and education**

The importance of effective awareness raising, and education cannot be over stated.

The public's current understanding of where, how and what e-waste and batteries can be recycled is limited and generally very poor.

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MRI E-cycle Solutions supports the current work being undertaken by Sustainability Victoria and encourages Sustainability Victoria to work closely with the NTCRS Co-Regulatory Arrangements, MobileMuster, ABRI, ALDI, IKEA and other existing collection programs funded by industry through product stewardship organisations or individually, in developing consistent messaging.

Engaging and informative education campaigns targeting householders, schools, small business, private companies and public institutions, are essential and should be developed and implemented on an ongoing basis to ensure that the message gets through and is widely adopted.

- **Coordinating with existing schemes and programs**

The proposed landfill ban will benefit from coordinating with existing schemes and ensuring a high degree of uniformity and consistency in language, definitions and general messaging.

The proposed ban, and its wider public promotion should complement and not conflict with, or create confusion with existing stewardship programs such as the NTCRS, MobileMuster, Fluorocycle and Cartridges 4 Planet Ark.

There is a real opportunity to for the Victorian Government to facilitate the coordination of efforts, pooling of resources to deliver a strong, clear message to the public.

We encourage Sustainability Victoria to work closely with other existing programs to ensure high levels of coordination and collaboration on e-waste management in Victoria.

The final package of interventions, policies and campaigns associated with the e-waste landfill ban should also ensure a very high degree of harmonisation, alignment and collaboration with existing national Product Stewardship schemes such as the NTCRS.

- **Industry support and funding**

Ongoing financial and technical support from the Victoria Government will be vital in making the proposed landfill ban a success. This requires targeted funding and grants to assist both councils and recyclers to improve and expand infrastructure and processing technologies where relevant.

As the ban is not a 'stewardship' or PRO oriented initiative, it must contribute to industry and council development activities through increased funding, be it for standardised receptacles, improved council collection sites, signage at aggregation points, more advances sorting and processing technologies, and research focused on problematic e-waste materials currently not being recycled including PV panels and related energy storage solutions.

- **Product Stewardship for Non NTCRS electronics and batteries**

An e-waste landfill ban in Victoria will result in several key categories of e-waste and batteries not being covered by industry-funded stewardship schemes.

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To ensure the long-term success of the e-waste land fill ban we encourage the Victorian Government to push for the expansion of the NTCRS scope through the current Commonwealth Review of the Product Stewardship Act to include other electronics and batteries.

It is important that electronic and battery manufacturers and retailers contribute to the recovery of the products that they manufacture, import and sell. Such contributions remove some of the burden placed on local government in the implementation of the scheme.

We also encourage the Victorian Government to play a greater role in supporting the establishment of national collection and recycling scheme for handheld batteries as per the official Product List under the Product Stewardship Act.

This would require Victoria to work much more closely with the Battery Industry Working Group and the Queensland Department of Environment and Science (as the lead jurisdiction working on battery stewardship). Especially in supporting implementation of regulations that prevent free riding.

We look forward to seeing the policy package finalised and would welcome the opportunity to further discussed any of the issues outlined in our submission.

Yours sincerely



Rose Read
Chief Executive Officer
MRI PSO



Will LeMessurier
Managing Director
MRI E-cycle Solutions

About MRI E-cycle Solutions

With over 25 years' experience, Australian owned MRI E-cycle Solutions is a pioneer in delivering safe, secure, ethical and environmentally sound electronic and battery recycling solutions Australia wide. From re-marketing IT assets and secure data destruction through to best practice e-waste and battery recycling and product stewardship services, we have it covered. With recycling facilities located in four capital cities and more than 220+ FREE public Drop Zone collection sites around Australia we provide a national service to businesses and the community. We also partner with several disability enterprises. We are ISO 14001, AS/NZS 5377 and EPA accredited.

www.mri.com.au

About Dropzone

MRI PSO is an industry funded and Federal Government approved service under the National Television and Computer Recycling Scheme, that ensures all products collected are recycled to

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the Australia Standard AS/NZ 5377 and that over 90% of materials are recovered in an environmentally sound, safe and secure manner.

Through our public nationwide collection network **Dropzone** we make it easier for Australians to correctly dispose of their e-waste thereby reducing their environmental footprint.

www.dropzone.org.au

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