

SUBMISSION TO E-WASTE LANDFILL BAN PUBLIC CONSULTATION

GIPPSLAND LOCAL GOVERNMENT WASTE FORUM

The Gippsland Local Government Waste Forum (the Gippsland Forum) is pleased to provide a response to the Victorian Government's public consultation in relation to Victoria's E-Waste Landfill Ban. This response has been facilitated by the Gippsland Waste and Resource Recovery Group (GWRRG) as the secretariat of the Forum, in collaboration with the Bass Coast, Baw Baw, East Gippsland, South Gippsland and Wellington Shire Councils and the Latrobe City Council.

The Gippsland Forum supports the intention of the proposed ban to bring about improved environmental performance of waste management services in Victoria. However, as the representative group of local government waste and resource recovery, there are a number of concerns that remain which are outlined below.

Financial impact on collectors

One of the key concerns for councils in Gippsland is the anticipated, and at this time indefinite, financial cost to local government resulting from the proposed ban including increased administration, education, transport, reprocessing, potential illegal dumping or stockpiling and infrastructure upgrade costs not funded through the current state government funding allocation. Furthermore, it is expected that the responsibility for sorting and clearing e-waste stockpiles and associated costs will ultimately fall on the local government site operators.

While the state government plans to invest \$16.5 million in infrastructure development and education, this funding does not include transport costs, or the true cost of infrastructure development required to meet the storage and management requirements at sites not deemed to be fitting the reasonable access criteria. In Gippsland the annual transport costs (incl. of capital, operational and labour costs) across all councils are estimated at approx. \$80,000. The recovery costs (reprocessing) are estimated at \$560,000 per annum.

The proposed ban timing fails to allow adequate time for councils to plan for and implement infrastructure upgrades and changed behavioural patterns for their respective communities, or to develop operational budgets to accommodate these changed circumstances.

The councils' budgeting process for the 2018-19 financial year has commenced and these factors cannot be accurately forecast as it is still not clear what the preferred operational approach for e-waste management will be and the expected service delivery model.

Furthermore, many councils have little understanding of the volumes of e-waste that they may receive after the ban is introduced. The ability for councils to accurately forecast into budgets the flow on effect of the new requirements for infrastructure upgrades, transport and processing costs is therefore limited.

In implementing the 'polluter pays principle', the Gippsland Forum encourages the State Government to continue to advocate for continued product stewardship programs for this material stream to ensure that the manufacturers take responsibility for the cost of recycling and disposal of their goods at the conclusion of their useful life.

Adequate local government infrastructure

Under the proposed ban, all sites collecting and storing e-waste will be required to comply with the Australian and New Zealand Standard, 'AS/NZS 5377:2013 *Collection, storage, transport and treatment of end-of-life electrical and electronic equipment*'. This requirement is already posed on sites operating under the National TV and Computer Recycling Scheme¹ and is therefore a current compliance issue. The assessment in Gippsland indicates that this standard is not being adhered to by those currently operating under the National Scheme. Inappropriate or inadequate storage of e-waste may result in the environmental damage such as the toxic substances² in electrical components and circuit board leaching into the environment.

The GWRRG's recent review of all material/resource recovery facilities in Gippsland identified that most Gippsland sites will require upgrading to achieve AS/NZS 5377:2013 compliance under the ban. Arrangements commonly seen at Gippsland transfer stations such as e-waste stored on the ground or on pallets on the ground in an uncovered area, or in a large skip bin located off the elevated waste sawtooth are not sufficient to meet the standard and to protect e-waste from damage or breakage.

The Gippsland Forum is concerned about the short timelines to enact the ban, including establishing the appropriate infrastructure and meeting compliance requirements in time to commence the ban on 1 July 2018. This is further compounded by the funding for infrastructure upgrades not being expected until March 2018.

The Gippsland Forum proposes that a minimum 12-month transition period be introduced to support the implementation of the full e-waste ban.

The presented options are modelled on 'reasonable access' which has been applied to collection systems such as the National TV and Computer Recycling Scheme and Victoria's Household Chemicals Collection Program. The application of 'reasonable access' can be complex for many regional, rural and remote areas due to distribution of population centres and relatively infrequent use of service. The feedback from councils in Gippsland regarding this approach is mixed. This emphasises the continued inequity experienced by some councils in implementing state and national programs to collect particular waste materials in regional Victoria.

Convenient alternative collection infrastructure

It is identified that the existing transfer station network is not conveniently located for disposing of small, one off electronic items. There is an opportunity to develop alternative disposal options or more prominent locations. Shopping centres and other locations of high and frequent visitation provide suitable alternatives for communities to dispose of these items, similar to the charity clothing bin model.

This option provides an opportunity to activate investment from industry to provide a service and / or develop an innovative approach to collecting, sorting and reprocessing this material. This aligns with the Victorian Market Development Strategy for Recovered Resources, the Gippsland Waste and Resource Recovery Implementation Plan (specifically driving innovative services and infrastructure provision – 'stimulate the introduction of innovative waste and resource recovery services and infrastructure by driving collaboration between local government, the waste industry and community to meet the diverse needs of Gippsland') and the Latrobe Valley Economic Growth Zone.

There is also an opportunity to utilise an active and engaged social enterprise sector, which has the capability and workforce to support a new service in regional Victoria.

The proposed one-off nature of mobile or 'event' style collections may also be a convenient way to provide more remote community members with opportunities to appropriately dispose of e-waste.

The Gippsland Forum propose that options other than the reliance on local government transfer stations be considered when implementing the e-waste ban.

¹ Since July 2016, the Australian Government has required co-regulatory arrangements to only contract recycling service providers that are certified AS/NZS 5377:2013.

² These may include lead, chromium, beryllium, cadmium, mercury, copper and brominated flame retardants.

Education

Development and implementation of an effective and engaging state-wide education program in the lead up to the ban and on an ongoing basis is the responsibility of the Victorian government. It is of high importance that the Victorian Government fund and administer the education campaign to empower local government to spread the message in their communities and minimise the financial burden on collectors/local government. Concerns remain regarding the potential requirement for councils to allocate resources and fund printing and distribution of education materials of this state-initiated program.

The Forum encourages a cooperative approach with the Victorian government to the development and distribution of clear and consistent messages involving e-waste ban working with its Education and Engagement sub-committee to engage local Gippsland communities.

Enforcing the Ban

The ban is proposed to have a wide remit, with everything with a cable or battery³ to be classified as e-waste. Therefore, it is likely that additional e-waste to be collected and segregated under the ban will include small and medium sized items such as toasters, hair dryers, toys and other small appliances.

There are concerns that the depositing of small and medium sized items to landfill will be difficult to monitor and enforce. It is highly likely that small items will be disposed of in kerbside garbage bins and enter landfills as part of an aggregated mass of waste from households and businesses. It is also difficult for a landfill operator to identify such materials once deposited on the landfill face, and prohibitively time consuming and risky for operators to be manually collecting small e-waste items in this environment.

Therefore, the Forum encourages greater dialogue to clarify the measures to be taken by EPA to enforce breaches of the ban to assist local government to develop an appropriate internal monitoring regime.

Reprocessors and end markets

There does not appear to be any reference to the increased aggregation of additional material volume on end markets and reprocessors or whether the financial considerations are still accurate once this is considered.

A major concern is whether the recycling and reprocessing industry has the capacity to meet the demands of this new product influx and accept certain products that have low to no value. There are also concerns regarding market failure and the potential resulting in stockpiling of materials. Any possible stockpiling may challenge business models based on a gate fee and allow private arrangements to undercut legitimate operators that properly process these materials in accordance with appropriate standards. Issues of this nature have been apparent and possibly still exist following the ban of tyres from landfill in Victoria

The Forum recommend that the state government develop indicators to monitor market health and identify issues that may negatively impact recycling of these goods to promote a proactive response to any potential failures or unintended outcomes of the ban.

Thank you for the opportunity to provide this submission. If you have any questions regarding this submission, please contact Matthew Peake, Executive Officer, Gippsland Waste and Resource Recovery Group acting as the secretariat for the Gippsland Local Government Waste Forum on 5633 3336.

Yours sincerely,



RICHARD ELLIS

Acting Chair - Gippsland Local Government Waste Forum

³ Official definition: "any end-of-life 'equipment which is dependent on electrical currents or electromagnetic fields in order to work properly."