



24 January 2018

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

To whom it may concern

### **Managing e-waste in Victoria – Telstra submission**

Telstra welcomes the opportunity to make a submission on the Government's proposed approach to managing e-waste.

Telstra takes its environmental management responsibilities very seriously and has a long history of developing, funding and implementing comprehensive electronic reuse, recycling and e-waste disposal programs. For example, we are a founding member and ongoing supporter of MobileMuster. However, we believe more can be done and are constantly reviewing and enhancing our electronic reuse, recycling and disposal programs while also providing e-waste management advice and services to our customers.

All of Telstra's e-waste activities are guided by a comprehensive strategy underpinned by sound product stewardship principles and we currently recycle over 4,000 tonnes of e-waste per annum as a result of these activities. We also work closely with our suppliers and vendors to identify electronics stewardship improvements throughout the entire product lifecycle. In addition, we have initiated a suite of voluntary activities to maximise resource efficiency that increasingly reflect a circular thinking approach to managing the lifecycle of technology hardware, including an internal electronics reuse and recycling strategy.

### **Telstra's Electronic Reuse and Recycling Strategy**

Telstra's Electronics Reuse and Recycling Strategy (Strategy), *Unlocking hidden value*, articulates the importance of applying integrated and collaborative approaches to realise business and community value through increased electronics recovery, reuse and recycling. We would encourage the Government to review our Strategy in the hope it may inform your efforts to manage e-waste more effectively. A copy of our Strategy is available at <https://www.telstra.com.au/content/dam/tcom/about-us/community-environment/pdf-b/Telstra-ERR-Strategy.pdf>.

### **Proposed e-waste landfill ban**

Telstra submits the following perspectives on the Government's draft policy to ban e-waste from landfill to help inform the final policy approach and implementation.

#### *Identifying and understanding barriers*

During the development of our Strategy, we identified four key barriers that must be overcome for improved electronics stewardship to occur, including:

1. **Cost, privacy and data security**  
Perceived cost of collection and recycling, and concerns regarding loss of data security and privacy.
2. **Awareness and education**  
Not knowing how to securely and responsibly reuse or recycle e-waste.
3. **Convenience**  
People's ability and willingness to find a local e-waste collection and recycling service.
4. **Attitudes and behaviour**  
People's desire to hold onto electronic equipment for spares, reuse, donation or other purposes.



To address these barriers our Strategy includes four streams of activity:

**1. Product recovery, reuse and recycling**

The key enabler involves offering employees and customers easy, convenient and rewarding collection options to reuse or recycle retired electronics. This directly contributes to increasing the recovery rates of retired electronics through convenient product collection opportunities.

**2. Responsible end-of-life management**

Establishing a panel of prequalified e-waste recycling vendors has been vital to supporting a streamlined procurement process and bolstering our ability to responsibly and securely reuse and recycle Telstra's retired electronics.

**3. Outreach and education**

Telstra seeks to be a trusted and influential voice on e-waste management amongst its employees, customers and the broader community. Awareness and education campaigns are needed to demonstrate how to securely and responsibly manage retired electronics as well as change behavior and they are an essential component of our Strategy. They also build trust, knowledge and confidence among customers and the public more broadly.

**4. Simplification and reporting**

Ensuring transparency and accountability through effective reporting is an ongoing activity under our Strategy. Detailed waste data in Telstra's annual Sustainability Report helps build knowledge and awareness among our people, customers, government and regulators, researchers, NGOs and the broader public.

*Additional comments and observations*

**1. Education and awareness is a cornerstone**

The awareness and education campaign being developed by Sustainability Victoria will play a critical role in informing, engaging and mobilising the public and business. Telstra commends this work and highlights the need for alignment and consistent content with other related e-waste education initiatives being administered by MobileMuster, co-regulatory arrangements operating under the National Television and Computer Recycling Scheme, Planet Ark and other stakeholders delivering waste and recycling related education programs.

**2. Broad definition of e-waste is appropriate**

Telstra supports the Government's broad definition of e-waste i.e. waste electrical or electronics equipment, or anything with a power cord or battery at the end of its useful life. A comprehensive definition helps to reduce confusion among consumers and business while maximising the resource recovery potential of how e-waste is managed. An emerging class of electronic equipment that has not been explicitly cited in the proposed package is technology associated with the Internet of Things. For example, Ericsson's 2016 Mobility report forecasts 28 billion internet connected devices by 2020 ([goo.gl/upaz3H](http://goo.gl/upaz3H)). This growing category of equipment and devices is broader than conventional and consumer electronics and deserves targeted attention.

**3. Effective application and auditing to AS/NZS 5377**

Telstra recommends that the application of AS/NZS 5377 be explicitly referenced in the proposed package of measures – regulatory and non-regulatory. Standards play a fundamental role in helping to improve the operational performance of e-waste management and are directly relevant to several aspects of banning e-waste from landfill. Telstra has adopted AS/NZS 5377 as an essential requirement in its procurement process and our prequalified e-waste management vendor panel.



#### 4. The relevance of the waste hierarchy to effective e-waste management

E-waste management can benefit from effective waste avoidance and reuse approaches. The need to extend the life of products, components and materials, directly and indirectly contributes towards achieving a circular economy. While the proposed policy package deals with 'recycling', there is also an opportunity to look at the economic and environmental value of reuse. The opportunity to provide guidance to consumers and businesses on how to repair and reuse electrical and electronic products should not be underestimated, and should be built into the proposed e-waste education and awareness campaign. Telstra has identified opportunities associated with electronics reuse and is developing innovative services that extend the lifespan of a product as a prerequisite to recycling e-waste at end-of-life.

#### 5. The importance of national alignment and harmonisation

The proposed package should ensure a high level of harmonisation and alignment with related e-waste policies, regulations and programs in other jurisdictions. Many stakeholders, including Telstra, operate on a national basis and the need to ensure uniform compliance contributes to improved environmental outcomes and economic efficiencies. There is much to learn (positive and negative) from other jurisdictions and how they have managed e-waste, both operationally and from a policy and regulatory perspective.

#### 6. Addressing privacy and data security

Telstra's research and Strategy clearly identifies privacy and data security as a major barrier to increased rates of collection, reuse and recycling. Our Strategy notes the rapid evolution of technology containing more personal information and therefore the need to ensure strong data security measures for all players and service providers along the collection, storage, reuse and recycling chain. The proposed non-regulatory measures, and especially the e-waste education and awareness campaign should include practical, user-friendly guidance on how to safely and securely manage data and hardware to protect personal and sensitive data.

### Summary

Telstra's Electronics Reuse and Recycling Strategy underscores the importance of creating unique opportunities to adopt more resource-efficient approaches to managing e-waste. A carefully developed e-waste landfill ban has the potential to support such an approach if effectively implemented. Most importantly we want to *unlock hidden value* through higher levels of electronics reuse and recycling. We encourage the Government to review our Strategy, and incorporate relevant aspects into the e-waste policy package.

Telstra thanks the Government for the opportunity to provide a submission on the development of such an important policy and community initiative and would welcome the chance to discuss any aspect in further detail. To arrange a further discussion, please contact Telstra's sustainability team at [sustainability@team.telstra.com](mailto:sustainability@team.telstra.com).

Yours sincerely

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