



CITY OF MELBOURNE

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Dear Angela

E-WASTE – PROPOSED POLICY PACKAGE SUBMISSION

Thank you for the opportunity to comment on the Proposed Policy Package for managing e-waste in Victoria (“the Policy”).

City of Melbourne’s Waste and Resource Recovery Plan 2015-18 (“the plan”) is our action plan for waste management. The objectives of the plan are to increase resource recovery, reduce waste to landfill and improve local amenity. There are ten initiatives in the plan including one that relates specifically to electronic and hard waste. The plan notes two priorities for e-waste: to reduce the amount being generated and to offer more recovery systems for unwanted items.

The Policy focusses on the management of e-waste at end of life which is a linear rather circular or ‘closed loop’ approach and provides a solution that is low on the waste hierarchy. Given e-waste will continue to grow as a waste stream– recycling cannot be the only solution. A greater focus is needed on innovation by producers to build longer lasting products that are repairable, have replaceable parts and are sourced from materials with lower carbon footprints. Existing product stewardship schemes need to be expanded or new schemes adopted to ensure that e-waste management in Victoria is not limited to recycling and end of life solutions.

Support is needed for local government to implement the Policy. Information regarding what makes a secure and user-friendly e-waste drop off station would be beneficial to ensure the systems used are compliant. Funding should be made available to enhance security and accessibility of e-waste drop-off points at locations such as the City of Melbourne’s community hubs and libraries rather than being limited to transfer station improvements. Educational materials including text and short videos suitable for use on social media should be provided for use as required.

Local government should not be the only provider of e-waste drop-off locations. Drop off hubs in large retailers (e.g. Bunnings / JB Hi Fi) would be convenient for the general public and should be explored by the Victorian Government.

A number of elements of the Draft Waste Management Policy (e-waste) need further clarification, as follows:

1. The definition of ‘e-waste service provider’ as ‘any person who conducts a business or undertaking that accepts e-waste...’ is very broad. City of Melbourne currently provides e-waste collection bins to high-rise apartment buildings on request. We would consider our waste contractor as the ‘e-waste service provider’. It would not be practical for each high-rise building manager to be considered an ‘e-waste service provider’ but the current wording of the Policy could be interpreted this way.
2. The definition of ‘specified e-waste’ does not include household products such as toasters or vacuum cleaners. The process for recording data on loads of mixed e-waste that includes both ‘specified e-waste’ and other types of e-waste needs to be clarified.
3. Transparency regarding whose responsibility is it to collect and report e-waste data is required. For example, if e-waste is collected in bins at a high-rise apartment building, then stored in bulk in a bulk bin temporarily by the waste contractor before being taken to a

reprocessing facility it is impractical and onerous for each party to record the e-waste volumes and may lead to errors and double-counting.

4. There is an emphasis on recording specified e-waste loads greater than 3m³, but it is unclear as to why this is significant. Multiple smaller loads may cumulatively surpass 3m³.

A checklist or template in the final Policy to guide the data collection and reporting processes would be invaluable.

City of Melbourne is currently drafting a Waste and Resource Recovery Strategy 2030 and an accompanying four-year action plan. The strategy and plan will outline our vision and set targets for waste reduction and resource recovery. The strategy will consider e-waste management in further detail. For more information please contact Melanie Oke, Waste Management Coordinator, on 03 9658 9951 or melanie.oke@melbourne.vic.gov.au.

Yours sincerely



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