



25 January 2017

Waste and Resource Recovery Team
Department of Environment, Land, Water and Planning
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Ask for: Kaylene Johnson
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Dear Waste and Resource Recovery Team,

Proposed policy package to ban electronic waste (e-waste) in Victoria

Hobsons Bay City Council welcomes the opportunity to provide a submission to the proposed policy package to manage electronic waste (e-waste) in Victoria.

The concerns raised by the Municipal Association of Victoria (MAV) in its submission are supported. This submission highlights key issues regarding the impact of the e-waste ban on Council services and the Hobsons Bay community.

If you would like to discuss this submission further, please contact Kaylene Johnson, Coordinator Environmental Management on 9932 1107 or email kjohnson@hobsonsbay.vic.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Eddy', written over a horizontal line.

Chris Eddy
Chief Executive Officer



Submission on proposed policy package to ban electronic waste in Victoria

Hobsons Bay City Council collects e-waste through its annual recycling events and hard waste collections. These services began in 2012 and 2014 respectively through partnerships with approved arrangements of the National Television and Computer Recycling Scheme. Council does not own or operate a waste and resource recovery facility or transfer station.

This submission highlights concerns with the assessment of regulatory interventions, the timeframes for implementation and support for product stewardship schemes. It also raises concerns of the financial impact of the electronic waste (e-waste) ban on Council's services and the Hobsons Bay community and the insufficient funding of the Victorian Government towards behavioural change. The concerns and issues raised by the Municipal Association of Victoria (MAV) in its submission are also supported.

Regulatory interventions considered

There is concern whether the Policy Impact Assessment (PIA) has considered a critical analysis of all possible regulatory interventions before proposing the preferred intervention being an e-waste ban from landfill.

The PIA has provided some reasoning but it largely lacked a detailed, quantifiable and triple bottom line analysis before recommending a significant strategic intervention that could impact the waste management industry in Victoria for many years to come. The regulatory intervention proposed seems pre-conceived and, as acknowledged in the PIA, is an end-of-the-line solution that does not place obligations on those involved in the upstream production of e-waste.

Therefore a fully-fledged objective analysis, comparing all possible regulatory intentions must be considered. The only criterion for selection of the intervention or group of interventions must be its merit to achieve the policy objective set.

In terms of when a regulatory requirements takes effect it would be best if this is postponed to July 2019 or later so that facilities are upgraded to new standards and reporting requirements are in place to meet regulatory obligations.

Product stewardship schemes

The Victorian Government should continue to advocate to expand existing product stewardship programs, particularly the National Television and Computer Recycling Scheme (the National Scheme), to place more responsibility for recycling end-of-life electrical goods on producers or importers. Product stewardship schemes ensure that the costs of recycling e-waste are predominantly borne by those who import, produce, sell and purchase the electronic goods, instead of councils.



The Commonwealth Government has the power to regulate companies under the *Product Stewardship Act 2011*, however it would be beneficial if the Victorian Government explored whether any elements of a product stewardship approach can be progressed by the state independently.

Impact of e-waste ban on Council

As stated earlier, an e-waste ban from landfill is an end-of-the-line solution that does not place obligations on those involved in the upstream production of e-waste. An e-waste ban from landfill places disproportionate responsibility on a landfill operator to prevent e-waste from ending up in landfill and for councils to prevent it from entering the collection systems. One of the areas of concern is the concealed disposal of small electronic goods, (which have various types of batteries) through kerbside garbage bins and the potential for them to become a fire hazard. It is unclear from the PIA what complementary mechanisms would be established to prevent or capture small electronic goods discarded through kerbside garbage bins.

One of the non-regulatory interventions proposed to increase diversion of e-waste from landfill is by ensuring transfer stations in Victoria are better prepared to accept e-waste and to store it safely until it is moved off-site. The PIA also states that transfer stations are not yet equipped to manage e-waste safely and therefore can limit collection potential. This may lead to dumping of e-waste and may create local environment, human health and occupational risks. It is unclear for councils that do not have transfer stations, such as Hobsons Bay, of the impact of the e-waste ban. However it is likely that there will be an increase in illegal dumping in our municipality and therefore increased costs of removing this waste.

The e-waste infrastructure support program will assist councils to upgrade their transfer stations. However, this support is not available for councils who do not have transfer stations. A network assessment is being undertaken by the Victorian Government but it is unclear when this will be completed and when recommendations for fit for purpose solutions would be available. Support for 'private sites' or event based recycling activities, where a service gap exists in coverage and access has not been assured and therefore should be considered.

Proposed service to collect e-waste

Of key concern is the ongoing collection costs that are left to the responsibility of those managing e-waste and in most cases this would be councils. The PIA shows that the collection, transport, sorting and disposal costs per tonne for conducting e-waste recycling events (ie \$179 per tonne) would be more than the residential e-waste drop off service (ie \$168 per tonne). This is yet another financial increase that councils are expected to cover. It is also unclear whether the e-waste infrastructure fund would be available to upgrade mobile collection event sites.

The model to collect e-waste through the Household Chemical Collection program, which is administered by Sustainability Victoria in partnership with local councils, is supported. As noted in the PIA a 'One-stop shop' collection is likely to be less costly



both for people disposing e-waste and for the overall administration of the system. An e-waste collection through the Detox your Home mobile collection events would provide equity and access to councils and communities that do not have a transfer station and those councils who are left out from permanent drop off sites through the National Scheme.

Waste Management Policy (E-waste) 2018

Clause 7.1 of the draft new *Waste Management Policy (E-waste) 2018* is somewhat ambiguous. It is understood that the intention is to avoid storage of e-waste for the purpose of disposal, however it is unclear how this would be assessed and enforced.

There is concern about the impact of reporting requirements mandated for e-waste service providers (Clause 7). It is not clear whether hard waste collection contractors would be considered as an e-waste service provider. Although for Council the quantity collected from each hard waste collection is less than three cubic metres, cumulatively Council's hard waste collection contractor collects greater than three cubic metres in a day or week. Therefore some improved clarity in this area would be beneficial. If hard waste collectors are considered e-waste collectors, councils should be allowed time to review their contracts which may result in contract variations and increased costs.

Also of concern is the expected influx of hard waste collections as a result of the e-waste ban and the financial impact this will have on Council, particularly in a rate capped environment. Consideration to financially supporting these increases would be welcomed.

Supporting tools to manage e-waste

The Victorian Government is urged to provide tools to support councils in managing e-waste collections. This would include standard contract specification templates for e-waste and hard waste collection services, communication materials, data collection and reporting templates and a tool kit specifically for managing illegal dumping of e-waste.

Education campaign

As acknowledged in the PIA, an effective and ongoing communication and education campaign is essential to the overall success of the new interventions planned, particularly the e-waste ban. The campaign will need to focus on achieving behavioural change among Victorians to 'do the right thing' in disposing and recycling e-waste. Ineffective and inadequate communication and education campaigns could lead to a significant increase in illegal dumping and leakage of e-waste through kerbside bins.

The funding allocated by the Victorian Government is not sufficient to make significant behavioural change needed when introducing such an important change in waste disposal. It is unfair to leave the education component of a Victorian Government policy initiative to councils who are already burdened by collecting illegally dumped e-waste and managing their finances in a rate capped environment. Therefore Victorian Government funding and leadership in educating Victorians is required.