

RE - BANNING E-WASTE FROM LANDFILL IN VICTORIA

The [National Waste and Recycling Industry Council \(NWRIC\)](#) welcome the opportunity to comment on the implementation of bans on e-waste to landfill in Victoria.

The NWRIC ('the Council') is the only organisation representing small and large waste and recycling businesses Australia wide. Our members hold the majority of the private market capital invested into waste and recycling assets in Australia. The Council advocates for better environmental standards, fairer markets and better planning for waste management and recycling infrastructure.

Supporting this submission is the [Australian Landfill Owners Association \(ALOA\)](#). Landfill is an essential service in Australia and ALOA advocates for high quality landfill management and the protection of public health.

The NWRIC support e-waste from landfill bans

In October 2017 - the NWRIC membership debated the introduction of bans on e-waste to landfill in Victoria, and agreed to support this approach. Further, the Council calls on all State Governments to harmonise the definition of e-waste and secondly introduce robust waste diversion policies to direct all e-waste to resource recovery, including expansion of Commonwealth Product Stewardship Schemes.

As the Council wants to ensure the Victorian bans are a success, it requests the following points in regard to their implementation be further investigated.

1. Preventing cross border transport of e-waste out of Victoria

The Council expects that bans on e-waste to landfill will increase the cost of e-waste disposal in Victoria. In this case, there will be an incentive to transport e-waste out of the State to avoid the bans. As a result the Council would like to see policies in place to minimise this 'leakage' of e-waste into regional NSW or South Australia.

2. Effective enforcement of standards

As previously put forward by NWRIC member Sims Metals Management - the presence of sub-standard and illegal operators remains a large barrier to the establishment of high quality e-waste recovery infrastructure in Victoria. Therefore, the Council submits that any new ban be accompanied by renewed enforcement across **all** facilities.

This enforcement should include regular auditing, to ensure operations are complying with [Australian Standard AS5573:2013](#) for e-waste processing.

The NWRIC has previously called for all waste processors (regardless of size) to be licensed. With the banning of e-waste to landfill it will be important to ensure this approach includes e-waste processors.

3. Expedient licensing and permits for e-waste processors

We expect that bans on e-waste to landfill will spur investment into new e-waste processing infrastructure and services. To assist with this welcome development, we encourage State regulators to expedite planning reviews to ensure that new e-waste recovery infrastructure is adequately provided across the states.

4. Discharge of the 'duty of care' for landfill operators and owners

The purpose of landfill is to protect public health. Accepting loads at landfills ensures that waste is not dumped into the environment or causes a public health concern.

Therefore, where landfill operators have taken reasonable steps to ensure that identifiable loads of e-waste are rejected, the Council believes that landfill operators should not be penalised for e-waste which inadvertently ends up buried on their site.

Further, landfill operators should not be penalised if small amounts of e-waste in mixed waste is later identified in the landfill.

For further information, contact us.

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