



Technical & Environmental Services
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TO WHOM IT MAY CONCERN
Waste & Resource Efficiency Team
Sustainability Policy
Department of Environment, Land, Water and Planning
Level 1, 8 Nicholson Street,
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**Victorian Government, Managing E-Waste in Victoria,
Proposed Policy Package**

Toxfree Australia is a fully integrated waste management and industrial services company operating across Australia, with expertise and experience across diverse sectors. Toxfree has a proven track record in the provision of high quality, client driven waste services focusing on a cost-effective service delivery that exceeds legislative and regulatory requirements.

ToxFree operates a major e-waste recycling facility in Dandenong, Victoria. Our operation has a capacity to process over 15,000 tonnes/annum of e-waste utilising innovative mechanical separation technologies. Toxfree exclusively uses state of the art BluBox technology to recycle next generation e-waste, such as flat panel displays, smart phones, tablets and laptops which contain mercury. The technology can also process a wider variety of domestic e-waste for example, toasters and hair dryers.

On behalf of ToxFree Australia's, TES E-cycle please find our comments regarding the Proposed Policy Package with respect to Victorian Government ban of e-waste to landfill.

1. Proposed Package Options

The impact analysis prepared by the Victorian Government includes multiple models to implement the landfill ban. As a recycler where process viability is dependent on volume, Option 1a would be the most beneficial as it would capture a significant portion of e-waste that would be going to landfill. However, to strike a balance between costs vs impact, we recommend Option 1c as the most practicable approach at least during the initial years.

In regards, to next steps if Option 1c is selected as the model, it is vital that the Victorian Government engages with stakeholders responsible for collecting/receiving bulk e-waste such as councils and transfer stations on the likely cost for implementation. This also includes strategies to minimise the costs for example:

- Maximise recycling of e-waste covered under the NTCRS;
- Segregating high metal materials such as white goods and recycling through scrap metal recyclers to offset processing costs of low resource recovery e-waste; and
- Minimising logistics costs for out-of-scope NTCRS material by compacting as long as it does not contravene EPA regulations.

The cost impact is a major concern raised by our collection partners and needs to be addressed in the early stages so that the e-waste ban can be appropriately planned and budgeted.

2. Draft Waste Management Policy (E-waste) 2018

It is positive to see the Victorian Government has drafted a policy for the management of e-waste in Victoria. Understanding it is a draft we recommend the following amendments may provide improvements that will benefit the delivery of the policy.

In the current form, the policy does not provide a mechanism to validate e-waste service providers responsible for reprocessing and re-use of e-waste are compliant to requirements outlined in 6, 7 and 8. Furthermore the current requirements do not address existing common bad practices which could lead to harmful outcomes to both the environment and personnel. Such bad practices include illegally exporting e-waste, poor risk managed recycling processes and storage of e-waste in an exposed environment.

For e-waste service providers reprocessing and re-use greater than 3 cubic metres per consignment the following should be considered:

- EPA audits/health checks; and
- Certification to AS/NZS 5377:2013 by an JAS/ANZ approved organisation

As a minimum for e-waste service providers reprocessing and re-use, clause 7 should also extend to the following sections in AS/NZS 5377:2013:

- 1.6.3 Risk assessment and management;
- 1.6.4 Emergency response;
- 1.6.5 Training;
- 2.4.2 Storage facilities; and
- Section 3 Recovery for Re-Use from End-Of-Life Electrical and Electronic equipment*.

** To prevent the practice of end of life e-waste being exported falsely under the premise of 're-use' and potentially ending up in a landfill or dumped overseas.*

In our experience, the majority of Victorian recyclers follow AS/NZS 5377:2013 practices and by including the requirements as part of the policy it will only lift the remaining recyclers to an acceptable standard which ultimately benefits the Victorian community by promoting best practice recycling and further investment into state of the art recycling technologies.

As mentioned in previous submissions, careful consideration should be given to how the e-waste can be collected and consolidated from the public to comply with the policy. It is well known that human behaviour dictates that compliance is strongly driven by ease of access which will ultimately influence the policies success.



Finally, ToxFree offers our full cooperation to the Victorian Government for implementing the landfill ban. Should there be any further consultation required please do not hesitate to contact Toxfree.

Yours Sincerely,

Karvan Jayaweera
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ToxFree Australia