



Mildura Rural City Council

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MILDURA RURAL CITY COUNCIL FEEDBACK ON THE PROPOSED E-WASTE POLICY PACKAGE

Mildura Rural City Council is supportive of any initiative that will divert waste from landfill particularly those items which contain hazardous materials that have the potential to adversely impact the environment and human health. Council does however have some serious concerns with the lack of detail on how this package will be delivered and the financial impact on our community in far north western regional Victoria.

The Statewide Waste and Resource Recovery Plan (SWRRP) rates e-waste diversion as a low priority and indicates that the cost and transporting of collected e-waste materials may not be viable in rural and regional areas which could result in stockpiling. The SWRRP also indicates that industry should be supported to develop the capacity to improve the separation and sorting process. Again from a regional perspective this does not appear to be addressed as part of this policy package.

There are important aspects of this legislation which Council has considered under the following sub headings.

Education

There appears to be a very limited understanding in the community around the definition of e-waste. There has been no education, information or collateral available to communities about the definition of e-waste and how this impacts the way people manage waste. There is a concern that the responsibility for communicating this ban invariably fall back on Local Government which again is an additional cost to regional communities. It is noted that the Andrew's government has allocated \$1.5m towards a three year program for education however to be effective this needs to be underway well before the ban is in place and funding for this needs to be recurring indefinitely.

Given the short lead time heading up to the ban on July 1 2018 this is no opportunity to commence any awareness or education programs before the ban which will result in poor outcomes. It is noted that a very brief consultation sessions for our Council were held in Ouyen on Monday 27 November which has indicated that information will be provided to Local Government but again the short timeframes are concerning. With this in mind Council strongly believes that the Government delay the commencement date of 1 July 2018 to allow a

comprehensive education and information program to be planned and delivered.

Enforcement

Council is making the assumption that the change in regulatory measures will result in an amendment to existing landfill licence conditions. The information package is somewhat silent on the application of this licence condition and the level of enforcement that will follow this decision. Whilst Council had no deliberate intent to breach any regulatory or policy position, there are many factors out of the direct control of Council which will result in e-waste being deposited into Landfill.

Most notably, problems will include anything from the kerbside general refuse bins where it is inevitable that banned items will be deposited in landfill. From our experience the EPA, as the regulatory body who will be responsible for the enforcement of this ban, will issue improvement notices asking Council to demonstrate what it is doing to ensure that no e-waste ends up in landfill. It is an inherently impossible condition to meet to the full extent of the definition and proposed ban. It is also unclear what process is in place for when e-waste is 'rejected' by recyclers or unable to be recovered. If this product is banned from landfill what options are available to landfills and Council? Council's requests that the Government respond to provide clarity on the specific wording for landfill licence conditions and to detail the level of enforcement that will be applied to licence holders.

Cost to community

This proposed policy change will have a direct increase in cost to our community. Our community's capacity to pay is already under pressure, the introduction of an additional cost burden should be funded by industry through well organised stewardship schemes not residents. There have been no attempts or efforts made in terms of product stewardship to fund this change. It has been communicated at DELWP workshops that the average cost for this ban will be in the vicinity of \$2 per household in Victoria.

It is very convenient to generalise this cost across the state however it is patently obvious that regional Victoria will be disproportionately affected as distance to markets is always a problem.

It is noted that Option 1c is preferred which is a comprehensive landfill ban with a medium access to collection where benefits are expected to exceed costs. This may be the case in metropolitan Melbourne however this grossly disenfranchises regional residents. The analysis clearly shows that the distribution of costs will fall on Councils and ratepayers. As the benefits in this analysis are predominantly in the market value of the recovered material, which

has proven to be a volatile commodity, how can the ongoing viability of this scheme be guaranteed?

Industry and markets for this type of material do not exist in regional Victoria which can triple the cost of recycling e-waste items due to transport and accessibility costs. Environmental justice promotes the fair treatment of everyone irrespective of where they live through the development, implementation, and enforcement of environmental laws, regulations, and policies. Unfortunately the impact or support regional Victoria has not been considered or offered. Again Council recommends that the Government delay the implementation of the ban until a product stewardship scheme is introduced and to allow Waste Management Groups to undertake market assessment and collaborative procurement exercise prior to implementing the ban

E-Waste Infrastructure Support Program

Provision of funding for access and storage points through the Victorian waste network unfortunately does little to address the cost, transport and accessibility to market for regional and remote Councils. This scheme also appears to be contradictory to intent of the policy change and recent taskforce inspections on waste stockpiles. It appears that the funding of \$15m, destined to be shared amongst the 79 Councils, will be for sheds for the mass storage of potentially volatile and dangerous goods.

If Councils such as Mildura are unable to obtain a reliable collection service, which has been our experience with televisions and tyres, there is potential for increased fire risk at all landfill sites. Additionally there is little possibility of Councils being able to procure and build any infrastructure at proposed collection sites prior to the ban due to the procurement process and the EPA works approval process. It also places an additional building on existing landfill sites which increases gas monitoring costs for licenced premises. Building more infrastructure is not the priority, establishing contracts and regional markets is required to ensure the product is able to get to market. Council requests that the Government make the results of the market assessment public, delay the commencement of the until facilities are properly assessed and constructed and delay the commencement of the ban until contracts are able to be established to enable Council to budget for the change.

Council Budgets

As there are no information in regards to the costs associated with this change Councils are simply unable to correctly estimate budgets for the 2018/19 and future financial years. This includes accurately estimating fees and charges for landfill gate prices. Budgets are currently being established in line with deadlines for rate capping submission deadlines. There will be no early indication or evidence available to ensure that ratepayers are not unfairly

charged. Again Council recommends that the ban be delayed until contracts are able to be established to enable Council to budget for the

Illegal Dumping

There will inevitably be a flow on effect of other aspects such as illegal dumping. Currently there are no programs in place to tackle this ever increasing problem. Again ratepayers will wear the cost of expensive investigations and clean ups. Council recommends that a feasibility study be undertaken to assess the viability to reintroduce the Litter Prevention Officer program, funded by EPA levy payments as a permanent initiative.

Data and Reporting

The reporting requirements in the policy are incredibly onerous and detailed. This will invariably result in additional cost and customer service timeframes. Again it is unclear whether or not the licence conditions will reflect this change and how the data should be supplied either through the EPA portal or via the various Waste Management Groups. Council requests that the reporting expectations be made clear and significantly simplified.

Overall whilst the goal of reducing waste to landfill is one that all levels of government support the solution needs to be clear and equitable across all of Victoria. . It is very concerning that such a significant change has been proposed prior to any public examination of the implications of such a ban. There have been no education programs, no market development and no consideration given to parts of Victoria who will be most affected by this change. Council is of the strong belief that this ban should not commence on July 1 2018 as there are no clear mechanisms in place to ensure it is affordable and effective

Yours sincerely

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MANAGER PARKS & WASTE SERVICES