

Our Reference: D9645317



*South Gippsland
Shire Council*

Come for the beauty, Stay for the lifestyle

14 December 2017

Department of Environment, Land, Water & Planning
PO Box 500
East Melbourne VIC 8002

Dear Sir or Madam,

Proposed E-Waste Landfill Ban

I am writing on behalf of the South Gippsland Shire Council to provide feedback on the proposed e-waste landfill ban.

- We support a landfill ban on e-waste containing hazardous materials such as TVs and computers.
- We do not support a ban that encompasses everything that has had a cord or battery due to substantially increase costs to residents for what we believe would provide limited environmental benefit.
- We do not support Option 1b which provides for "medium access". While this option may well be the best option for metropolitan areas, the level of access that this option provides for in rural areas is grossly inadequate. The current rationale for sites is based on population size. This should be changed to geographic location based on reasonable travel distances for users of the sites. In the case of South Gippsland Shire, if sites were allocated according to Option 1b we would have several sites relatively close together and three quarters of the Shire with no appropriately accessible collection points. Our Council has already determined the suitable level of access for their residents and has provided resource recovery centres accordingly. To reduce this accessibility further would increase illegal dumping (causing even further cost increases to council) and reduce the amount of material diverted from landfill for recycling.
- Mobile collections are not an option for our Council. They would require significant costs to either purchase collection equipment ourselves or to contract out the service. Also, the limited access on set days makes a mobile collection less likely to attract customers compared to a resource recovery centre that has regular hours.

- While we support the ideal to operate all collection sites in accordance with the Australian Standard AS5377:2013, this needs to be implemented in a staged manner, supported by grant funding. The cost to make all collection sites compliant will be significant, on top of the increased cost incurred for transporting and recycling additional e-waste material much of which has limited value.
- We note that apart from cost and access issues with the proposed ban, implementing a ban on all e-waste will be problematic especially for small appliances. Regardless of the amount of education and promotion that the State Government undertakes, many people will prefer convenience over doing the right thing with small e-waste items and appliances. Many residents will dispose of small e-waste items through household waste bins rather than travelling to a resource recovery centre and paying a disposal fee. This behaviour will be incredibly hard to stop, even harder to police and will technically put councils in breach of the ban.

While the intention of the ban is good, we believe there are significant issues associated with pursuing the preferred Option 1b. Councils are not in a position to absorb considerable cost increases under the current rate capping situation.

If you wish to discuss any aspects of this submission please feel free to contact me on 5662 9814 or at peter.roberts@southgippsland.vic.gov.au

Yours faithfully



Peter Roberts
WASTE MANAGEMENT SUPERVISOR