

6 February 2015

Stewardship Regulator Section  
Department of the Environment  
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Canberra ACT 2601

**Email:** e-waste @environment.gov.au

To Whom It May Concern,

The Australian Council of Recycling (ACOR) is pleased to make this submission on the Operational Review of the National Television and Computer Recycling Scheme (the Review).

ACOR is the peak national industry representative of Australia's resource recovery and recycling industry. It represents the resource recovery and recycling industry in advancing its contribution to a profitable circular economy.

The ACOR submission seeks to make a positive contribution and to raise a number of matters in relation to the National Television and Computer Recycling Scheme (NTCRS).

The regulatory amendments in response to the issues of the e- waste management should be workable, fiscally responsible, not undermine the recycling industry as well as social and disability enterprises involved in the e- waste recycling sector.

ACOR acknowledges the *Product Stewardship Act 2011* and the NTCRS are important components of the National Waste Policy and provides the context for improved levels of e-waste recycling, however there are issues more broadly associated with e- waste management, particularly the instability in the e- waste recycling sector.

### **Reset target trajectory**

Currently, e- waste recyclers face significant fluctuations in the supply of feedstock with some CRAs ceasing to collect e- waste once their targets are achieved. Local councils also experience services being withdrawn due to the 'easily achieved' recycling target. As a result, e- waste is either stockpiled, containerised and exported (to third world countries with children seeking to recover metals in unsafe conditions) or disposed to landfill.

ACOR welcomes the Government increasing the recycling target setting to partly address the issue of feedstock fluctuation and commercial and policy failure. ACOR suggests to the Government to increase the recycling target to 56% in 2015- 16. The trajectory then increases by four per cent per year to meet the 80% target by 2026- 27. ACOR believes the rapid

increase in recycling targets can reduce the fluctuations in feedstock supply and also reduce the risk of stockpiling.

### **Increasing the level of support to state and local governments and introducing State and Territory collection targets**

Following the abolition of COAG some state governments have not lived up to their previous commitments. The Department should provide support to state, territory and local governments to manage e- waste outside the NTCRS, particularly during the roll- out towards the 80 per cent recycling target. As the demand of e- waste recycling significantly exceeds the availability of funded recycling, it is impossible to purely rely on local government efforts to meet the substantial shortfall in funded recycling. It is suggested that increasing local and state governments support to ensure local councils, particularly those located in remote areas have access to the scheme. This can be addressed by revising the Reasonable Access requirements and ensure local councils are not overlooked by the CRAs on the basis of the 'high transport cost' involving in servicing regional and remotes areas.

ACOR also suggests introducing collection targets for each State and Territory. The current single target is ineffective to ensure e- waste collection service is allocated equitably in each State and Territory. For instance, there are many communities in Western Australia and Queensland excluded from the scheme due to the remoteness. If collection targets can be allocated to each State and Territory, CRAs will be more pro- active to secure higher volumes on a more equitable basis nationwide.

### **Contract arrangement between CRAs and recyclers**

ACOR remains of the view that the NTCRS should provide the recycling industry with a greater certainty and visibility into the long- term supply of e- waste feedstock. Effectively, it can be achieved through strengthening the collaboration between Co- regulatory arrangements (CRAs) and recyclers to ensure a stable and sustainable supply and demand of feedstock.

ACOR supports the Review, which suggests increased visibility into predicted supply volumes that allow recycling businesses to plan accordingly. ACOR believes that the Department are able to provide a more accurate forecasting of waste arising after the scheme has been implemented for two years. As the predicted supply volume fluctuates every year due to factors, such as import declarations made by liable parties, consumer disposal behaviour and the fulfilment of recycling targets by CRAs. To ensure a greater accuracy of the predicted supply volume, it is essential for the Department to increase enforcement in flaw claims that made by liable parties and amend the Regulations to establish a settlement date to import declarations during each target year.

ACOR also advises the Department to introduce pricing minimum guidelines to protect e- waste recyclers, especially those social and disability enterprises. One of the issues identified in the current NTCRS is the price war created by the CRAs that have created an unstable recycling level whereby longevity cannot be maintained. Under the current competitive

market model of the NTCRS, some CRAs offer a low price to liable parties to collect their TVs and computers. As a result, recyclers are being forced to accept the collected TVs and computers at rates of \$15- \$450 per tonne which makes the recycling business unprofitable.

Without violating the competitive market model for the NTCRS, ACOR suggests CRAs can use the predicted supply volume to determine the minimum length of the contract.

ACOR recognises the desire of the Government to fix the current flaws of the scheme. As such, ACOR encourages the Government to ensure that the administrative arrangements of the scheme are able to protect and facilitate e- waste recyclers and local councils.

Again, ACOR welcomes the opportunity to contribute to the review of the scheme and stand ready to further assist the Government following the outcomes of the review.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Grant Musgrove', written in a cursive style.

*Grant Musgrove*

**Chief Executive Officer**