



7 November 2019

Product Stewardship Act Review Team
Stewardship and Waste Section – Environment Protection Division
Department of the Environment and Energy
GPO BOX 787
Canberra ACT 2601

Dear Sir / Madam,

Product Stewardship Act Review: Draft Report – AIIA Submission

Thank you for the opportunity to provide feedback on the draft report for the Product Stewardship Act Review.

About the AIIA – Environment Special Interest Group

The AIIA is Australia's peak representative body and advocacy group for those in the digital ecosystem. We are a not-for-profit organisation to benefit members, and AIIA membership fees are tax deductible. Since 1978, the AIIA has pursued activities to stimulate and grow the digital ecosystem, to create a favourable business environment for our members and to contribute to Australia's economic prosperity.

We do this by delivering outstanding member value by:

- providing a strong voice of influence
- building a sense of community through events and education
- enabling a network for collaboration and inspiration; and
- developing compelling content and relevant and interesting information.

We represent technology organisations of all shapes and sizes all around Australia, including:

- Global corporations such as Apple, Adobe, Avade, Dell EMC, Deloitte, Gartner, Google, IBM, Infosys, Intel, Lenovo, Microsoft and Oracle
- Multinational companies including Optus and Telstra
- National organisations including Data#3, ASG and Technology One; and
- a large number of small and medium businesses, start-ups, universities and digital incubators

Some 92% of AIIA members are small and medium Australian businesses and 8% of AIIA members are large Australian companies and multinational corporations

The members of the AIIA Environment Special Interest Group (SIG) represent major technology brands in both the domestic and international markets, and have been actively involved in responding to issues relating to product stewardship and sustainability over an extensive period of time.

AIIA Response:

A number of AIIA member organisations were actively involved on the development of the *Product Stewardship Act 2011* and the National Television and Computer Recycling Scheme, and notes that these frameworks have been instrumental in reducing the impact that both products and substances products can contain have on the environment throughout their lifecycle.

The AIIA supports the recommendations arising from the review. However, in affirming our support, we would like to express our concerns over the extensive period of time it may take to implement these. The AIIA recommends that the Department develop a list of immediate actions that can be undertaken to address current issues within the scheme. In particular:

- Resolve the regional collections issue by dividing responsibilities evenly between Product Stewardship Organisations
- Provide compliance oversight with the objectives of the scheme, especially in the areas of material sourcing, downstream activities and PSO governance
- Initiate a consultation process on the design of the proposed clearinghouse scheme
- Promote higher outcomes, such as reuse and upcycling

In noting the intent of the Department of Environment and Energy for the ICT industry to assume greater responsibility for product stewardship as part of a revised scheme, the AIIA supports the proposal on establishing an Australian clearinghouse system to address key issues in product stewardship. This system would centralise and standardise product stewardship in Australia, and provide an important source of information for local industry on reuse and recycling. The development of such a system would first need to be subject to broad industry consultation and review comparable systems introduced within other jurisdictions. A number of ICT companies have introduced refurbishment and reuse activities within their own organisations, and would be well-positioned to assist in designing a system that is appropriate for the Australian ICT sector. The AIIA Environment SIG would also be keen to take an active role in the design and development of an Australian clearinghouse framework.

Our initial recommendations on the function of the proposed clearinghouse framework include:

- governance and oversight for Product Stewardship Organisations (PSO), including a competent authority-based body
- communication and awareness on product stewardship and e-waste management
- regulatory oversight and coordinated responses for any non-compliant entities
- generate 'best practice' guidelines on e-waste management
- development of an allocation model to ensure equitable distribution of collection services in remote and regional Australia
- establishing tracking databases for recycling and e-waste in Australia

Priority should be given to ensuring compliance with the objectives of the scheme, in particular in the areas of material sourcing, downstream activities, and meaningful action to combat against non-

compliance. In making these recommendations, the AIIA Environment SIG states that any measures introduced to address product stewardship criteria should be consistent with International requirements, standards and best practice guidance.

The AIIA Environment SIG recommends the Department extends the current scope of the Waste Electrical and Electronic Equipment Directive (WEEE) to be closer to the European Union model. This will provide a more comprehensive approach to reuse and recycling, and will have a central role in any clearinghouse scheme.

In making this submission, the AIIA Environment SIG also recommends that an incentive scheme be developed on reuse activities for liable parties in Australia. In terms of the waste hierarchy, the scope of the current scheme reduces landfill in favour of recycling; there is now an opportunity to refocus our efforts on the higher-level goal of reuse. Efforts to extend product lifecycles should be encouraged, and introducing a system that provides liable parties with regulatory and / or financial support for reuse activities should be considered in tandem to reviews of Product Stewardship. Reuse increases societal wellbeing by keeping equipment in circulation longer in an affordable manner, which in turn provides employment opportunities, as well as delaying materials' entry into the waste stream.

In reference to the projected recycling target included in the draft report (pg.30), the AIIA Environment SIG notes the collection of export data for used ICT products has been difficult to compile due to much of this activity being undertaken by parties who operate outside the Product Stewardship Scheme and cannot be accounted for against liable imports. In order to rectify this issue, it will be necessary for the Government to enact broader reforms to extend the scope of the scheme to capture industry outliers. In the absence of such a restructuring it will be difficult to meet the proposed annual recovery targets of 80% by 2026-27.

The AIIA Environment SIG affirms its ongoing support for the Product Stewardship Scheme and would welcome further opportunities to engage with the Department of Environment and Energy in any activities relating to its regulatory framework.

Yours Sincerely,

A handwritten signature in cursive script that reads "J. Leslie".

Janet Leslie
Chair – Environment SIG
Australian Information Industry Association