Updating the 2009 National Waste Policy: Less waste, more resources

AIIA response

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Comments

The AIIA appreciates the opportunity to comment on this important issue.

The ICT industry fully supports sustainable e-waste management. In Australia the industry has worked closely and effectively with government on Product Stewardship, Greenhouse and Energy Minimum Standards, Packaging and many other initiatives.

The AIIA supports the government's review of the 2009 National Waste Policy and the five principles as focus areas. We do however have concerns by several strategies and proposed time frames.

Overall, from industry's experience with pervious schemes, the updated National Waste Policy (the policy) won't be able to be all things to all people. If the government proposes to go ahead with board targets it is critical that they articulate how it will be relevant to, and, how it will apply to, individual industries.

Members are also concerned that the policy seems overly focused on packaging with the presumption that it will achieve the goal of a circular economy without clearly articulating how the proposed strategies will go about doing this.

Our specific concerns and recommendations are outlined below.

Principle	*Strategy or Issue*	*Comments*
Principle 1: Avoid waste	Strategy 2 – Design	More detail is needed on how the implementation is to work. Importantly, the strategy needs to be consistent with international standards on design for the environment. OEMs in Australia are by and large part of the global market and already have design standards in place.
	Strategy 3 – Knowledge sharing, education and behaviour change	A thorough and relevant baseline needs to be established, then the waste avoidance principle should allow for industries to tailor approach and indeed high waste production industries should be prioritised. Government should also play a key role in educating consumers.
Principle 2: Improve resource recover	A national target of an 80 per cent average recovery rate from all resource recovery streams, following the waste hierarchy, by 2030	The measurement method for this target is critical. Based on industry experience with the NCTRS 80 percent seems very ambitious and likely unrealistic. In comparison Europe has set a target of 65 percent. Providing data on resource recovery to its end stage is very difficult. For ICT, most

		recyclers aren't able to measure beyond the first tier downstream. It is critical that Government actively work to remove barriers and streamline processes to encourage re-use and refurbishment at a global and local level. This also applies to materials that can be more effectively recycled in other countries where technologies are superior to those existing in Australia.
	Strategy 4 – Product stewardship	We generally support industry wide product stewardship. However product stewardship initiatives should be looked at by industry not product type and we strongly encourage establishing product stewardship organisations that can service a whole industry sector. For example in ICT, members currently have to join a number of schemes to meet compliance requirements including for the NTCRS, packaging and batteries. Targets, processes and costs are all different. In addition this strategy needs to be supported by legislation which eliminates potential free loaders.
Principle 3: Increase use of recycled material and build demand and markers for recycled products	A national target of 30 percent average recycled content across all goods and infrastructure procurement by 2030	Members are concerned that this is a huge endeavour in its practical implementation without an equally clear and beneficial trade off. The onus of the data collection and reporting will fall on industry. This is difficult to do and will require changes every time a product is updated. We propose it is much better to focus effort on developing a market for recycled material. Growing the recycling sector will more directly support the goal of moving to a circular economy than a government procurement target.

		If government procurement were to require the 30% average, how would this be measured? For example targeting 30% recycled content in packaging is reasonably achievable, but 30% recycled in sectors such as IT, automotive, etc is much harder to deliver and measure.
	Strategy 9 – Sustainable procurement by business and consumers	We do not support standardised national labelling unless it is consistent with international standards. For ICT, minimum standards and labelling requirements are often weaker than international requirements. Therefore, an Australian specific labelling requirement will only add additional cost to consumers without the corresponding benefit of stronger standards.
Principle 4: better manage material flows to benefit human health, the environment and the economy	Strategy 10 – Plastics and packaging	The first timeframe of 2019 is very soon and will depend on what is included under problematic and unnecessary single-use plastic. For example phasing out polystyrene would not be achievable. In practice, the majority of companies in the ICT sector in Australia are International Brands with packaging manufactured overseas with an average lead time for changes to packaging of several years.
Principle 5: improve information to support innovation, guide investment and enable informed consumer decisions	Strategy 13 – Data and reporting	Data driven policy is important. Government should explore technology solutions for tracking. We question if real time data is needed or whether sample and extrapolation is sufficient - similar to how the ABS uses their data.
	Strategy 14 – Market development and research	The proposed timeframes are ambitious and appear unachievable especially the milestone to analyse barriers and opportunities in markets for goods containing recycled content by 2018.

We reiterate the issue of data collection downstream and the option to explore technology solutions.

There are currently a few clear barriers preventing progress to circular economy in e-waste:

- High investment cost: it is expensive to set up high tech recycling infrastructure, with a heavy up-front cost for companies to fund

- Rapidly changing device technology: As technology changes so rapidly, the recycling technology must be agile and adaptable to keep up

- Shrinking form factors: as technology gets smaller, there is less material than previous generations of computing

- Low-value materials: With secondary reuse markets receiving the high value items, recyclers receive low value or low-quality materials, limiting resale costs

Excessive reporting may create barriers to industry developing and adopting innovative practices in this space.

We recommend the focus be on assisting industry to re-use or repurpose old material back into the supply chain.

Equally important is strong government support to develop markets for products using recycled materials.