

Waste Avoidance and Resource Recovery (e-waste) Regulations 2023

Consultation submissions summary and response



Department of Water and Environmental Regulation 8 Davidson Terrace Joondalup Western Australia 6027

Telephone +61 8 6364 7000 Facsimile +61 8 6364 7001

National Relay Service 13 36 77

wa.gov.au/dwer

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Acknowledgement

We acknowledge the Traditional Owners, the Whadjuk people of the Noongar Nation of the land upon which we live and work and pay our respects to their Elders past and present. We recognise the practice of intergenerational care for Country and its relevance to our work bringing it to life on Whadjuk Noongar Boodja. We seek to listen, learn and genuinely engage and build strong partnerships. We aim to provide sustainable opportunities for Aboriginal people within our workforce and through our business.

Country is a term used by Aboriginal people to describe the lands, waterways and seas to which they are intrinsically linked. The wellbeing, law, place, custom, language, spiritual belief, cultural practice, material sustenance, family and identity are all interwoven as one. Working with the community, we move forward with a shared commitment to protect and conserve Country for our future generations.

¹ The Department of Water and Environmental Regulation's head office, Prime House, is located in Joondalup, on Whadjuk Noongar Boodja. The above Acknowledgement of Country was endorsed by the department's Aboriginal Water and Environmental Advisory Group.

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Contents

1.	Purpose	4
2.	An e-waste ban in Western Australia	4
3.	Regulations to underpin the ban	4
4.	Consultation themes and responses	5
	4.1 Updates to the Regulations	5
	Recordkeeping and reporting	5
	Exemptions	5
	Categories and items in Schedule 1	6
	Definitions and details	6
	4.2. Other themes mentioned and response	7
	Product stewardship, national harmonisation, broader e-waste management (avoing reuse)	
	Transition period and compliance	7
	Communications and education	7
	Funding outside of infrastructure grants	7
5 .	Submissions and process	8
6.	Further questions about the ban?	8
Αp	pendix 1 – Submissions and response overview	9

1. Purpose

This paper presents information on the e-waste to landfill ban and the Department of Water and Environmental Regulation's (the department) responses to the summary of comments and submissions received on the consultation draft of the Waste Avoidance and Resource Recovery (E-waste) Regulations 2023 (draft Regulations).

2. An e-waste ban in Western Australia

Banning e-waste to landfill is an opportunity for Western Australia to better align our e-waste management with the objectives in the *Waste Avoidance and Resource*Recovery Strategy 2030, by managing our waste more responsibly and recovering more value and materials from our waste.

The Cook Government recognised this opportunity and made an election commitment to ban e-waste to landfill by 2024.

The State Government is delivering the implementation of the ban and funding of \$14 million has been allocated to support a practical and effective implementation approach under three key areas:

- 1. Making of new Regulations that focus on business, industry and e-waste management to give effect to the ban.
- 2. Providing \$10.1 million of infrastructure grants funding to support projects for e-waste collection and recycling in Western Australia.
- 3. Community education/marketing campaigns to encourage the community to participate in the ban; and targeted communications to support industry and business with the information required to ensure a smooth transition.

3. Regulations to underpin the ban

Building on a public consultation carried out in January 2023,² the development of the draft Regulations progressed and included input and advice from the E-waste Technical Advisory Group as well as the department's internal governance group.

The final Regulations are scheduled to commence on 1 July 2024 will see Western Australia align with other jurisdictions like Victoria and South Australia in implementing a regulatory ban of e-waste from disposal to landfill.

The initial phase of items in the ban's scope under Schedule 1 includes items covered under national product stewardship schemes or with material recovery pathways available as an alternative to landfill (e.g, televisions, computers, batteries, mobile phones).

Future phases of bans are likely to include more e-waste items once material recovery pathways are established. For example, future bans may be brought into effect after the Australian Government has committed to develop a regulatory scheme to reduce waste from small electrical products and solar photovoltaic systems.³

² https://consult.dwer.wa.gov.au/waste-policy/ban-on-e-waste-disposal-to-landfill-in-western-aus/

³ https://www.dcceew.gov.au/environment/protection/waste/product-stewardship/ministers-priority-list#photovoltaic-systems-electrical-and-electronic-products

4. Consultation themes and responses

4.1. Updates to the Regulations

Following consultation and with further development of the Regulations through the drafting process, consideration and update of provisions was carried out in several key themes and areas.

Recordkeeping and reporting

Submissions referred to the recordkeeping requirements of the regulations:

- E-waste records and reporting should be by weight (not "amount") to be consistent with other reporting requirements.
 - Amendment to provisions to reflect 'weight' of e-waste for recordkeeping have been made.
- Recordkeeping requirements were detailed in parts, needed to avoid double counting, should align with existing reporting and should consider total over financial year.
 - The recordkeeping requirements have been simplified and aligned with existing reporting periods. Further operational and policy advice will be provided in coming months regarding obligations and methodology to implement these provisions.
- Information sessions heard queries on whether public entities are subject to the regulations as part of 'significant' entities (and business entities), and a submission called for local governments to be exempt from reporting in the Regulations.
 - While recordkeeping is mandatory, the reporting for public and business entities is on request (not mandatory). Further operational and policy advice will be provided in coming months regarding these provisions, noting it is being scoped as part of the existing Waste Data Online system used for reporting requirements under the WARR Regulations.
 - The Regulations have been updated to define significant entities to include public (local and state government) and business entities. Reporting timeframes align with WARR Regulations requirements where possible.

Exemptions

- There was a request to define circumstances for exemptions (e.g. flood, cyclone etc).
 - The Regulations have been updated to specify event or circumstances (previously 'extraordinary') where it was a result of an even or circumstance, or where the regulated e-waste was in a remote location.
- A timeline on decision-making for exemption was requested.
 - o It is not intended to include a timeframe for decision-making in the regulations.

Categories and items in Schedule 1

Submissions called for:

- Vapes / e-cigarettes to be included in the list of items for banning.
 - The department is working with the Commonwealth Government on estewardship measures and a nationally consistent and concerted response to vaping practice and implements in the community.
 - Therefore, vapes have not been drafted into the list of items under Schedule 1 of the Regulations.
- Medical devices under 50cm x 50cm x 50cm to be considered.
 - Consultation with the State's health department found smaller medical devices could be considered for future phases of the ban, due to further work on defining recovery pathways being required, and the potential high risk of adverse outcomes to hospitals and medical sector if smaller equipment was included in the Schedule 1 at this time.
 - Therefore, small medical devices have not been drafted into the list of items under Schedule 1 of the Regulations.
- Clarification / refining the types of batteries included.
 - The department has heard concerns from industry on the issue of battery fires in the waste management industry. The regulations will continue to have all batteries listed on Schedule 1 as regulated e-waste.

Definitions and details

- · Add: Waste:
 - Waste is defined in the WARR Act and was not added to the Regulations.
- Add: dedicated e-waste aggregation point (at landfill site), data security, signage, sanitation certificates (medical):
 - These additions are considered operational matters for e-waste service providers and landfills to manage and have not been added to the Regulations at this time.
- The storage time of less than 12 months may be problematic:
 - The department will monitor the outcomes of the ban and amendments can be made as necessary, however, changes to the storage time have not been updated in the Regulations at this time.

4.2. Other themes mentioned and responses

Product stewardship, national harmonisation, broader e-waste management (avoid, reuse)

- National harmonisation is one of the guiding principles of the ban. The department is committed to continued national alignment, including under the National Waste Action Plan – Action item 3.9⁴ Develop a common approach to restrict the disposal of priority products and materials in landfill, starting with lithium-ion batteries, materials collected for the purpose of recycling, and e-waste.
- The department is working with the Australian Government on e-stewardship, future regulatory scheme planning work and management of vapes in the community.

Transition period and compliance

Defining a transition period is underway. Similar regulatory implementations like the plan for plastics saw an education-focused approach to compliance in the first 12 months after commencement. The ban will likely follow this approach, to support industry and business with a smooth transition. Action may be taken by the department where warranted when an environmental or human health risk has been identified.

Communications and education

- Community education mechanisms that focus on waste avoidance behaviour, repair and reuse culture will be delivered under the existing WasteSorted and GREAT Sorts behaviour change initiatives to complement the regulations.
- Communication planning and delivery to waste industries and other e-waste service providers is underway. Further work to develop and deliver appropriate communications towards commencement of the ban on 1 July 2024 will be carried out in coming months and will involve consultation with local governments.
- Supplementary communications to stakeholders may involve more detailed information on e-waste management facets, like data sanitisation and certificates on sanitisation for medical devices.

Funding outside of infrastructure grants

The department is investigating options to help offset costs in the implementation of the ban not covered under scheme arrangements. Further details on any other funding or additional support grants will be provided as appropriate.

7

⁴ National Waste Policy Action Plan Annexure 2022 (dcceew.gov.au)

5. Submissions and process

The draft Regulations were released for comment for eight weeks from 26 September to 22 November 2023. An information paper was provided for guidance, as well as a template for structuring responses.

Submissions are redacted and provided on the department's consultation page.5

<u>Appendix 1</u> provides the department's response to the 14 non-confidential submissions received from:

Australian Council of Recycling, Total Green Recycling, Scipher	National Environmental Law Association
Australian Industry Group	Perth Airport
Australian Retailers Association	R Oostryck
Charitable Recyclers Australia (WA)	Shire of Carnamah
City of Greater Geraldton	Waste Management and Resource Recovery Association Australia
Department of Finance	Western Australian Local Government Association
H Vangiessen	Western Metropolitan Regional Council

6. Further questions about the ban?

Queries and clarifications required on the implementation of the ban can be sent by email (preferred) to ewaste@dwer.wa.gov.au.

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⁵ https://consult.dwer.wa.gov.au/waste-policy/draft-regulations-for-e-waste-ban/

Appendix 1 – Submissions and response overview

Stakeholder	Summary	Response
Australian Council of Recycling (jointly signed with Total Green Recycling and Scipher)	 Existing product stewardship schemes for e-waste (including the National Television and Computer Recycling Scheme or NTCRS) have inefficiencies and do not cover all costs of recycling e-waste. Loose and embedded batteries are a notable issue in the waste industry in terms of hazards, including fires. Vapes waste require management. 	 The department: is investigating options to help offset costs in the implementation of the ban not covered under scheme arrangements. has heard concerns about the battery fires seen in the industry. commits to the delivery of community education mechanisms that focus on waste avoidance behaviour, repair and reuse culture to be delivered under the existing WasteSorted and GREAT Sorts behaviour change initiatives. is aware local government and industry communications ensure the community understands correct disposal options and locations, and how this information is provided to the community. is working with the Australian Government on e-stewardship and management of vapes in the community.
	 A definition is required for 'waste'. E-waste service providers will need to be made aware of the Regulations (including scrap metal merchants). Charitable recyclers will be impacted by the Regulations. 	 Waste is defined in the Waste Avoidance and Resource Recovery Act 2007. Communication planning and delivery to waste industries and other e-waste service providers is underway. Further work to develop and deliver appropriate communications towards commencement of the ban on 1 July 2024 will be carried out in coming months. Charitable Recycling Australia's 'Charitable Donation Bins: Voluntary Code of Practice'⁶ recommends charity donation bins are clearly labelled with a list of items that can be donated. Hence, regulated e-waste items placed in donation bins that are not included on that labelling are likely unintended capture and considered an exception to the Regulations.
	 Include 'dedicated e-waste aggregation point' for clarity where regulated e-waste is sent to or left at a landfill site. Storage time less than 12 months may not be feasible logistically and it may take more than 12 months to aggregate enough items to facilitate collection in a cost-effective manner. Recordkeeping and reporting should be amended to e-waste as measured by weight. Data security is not mentioned. Timeframes for reporting should align with significant businesses and e-waste service providers. Medical devices need to have clause about sanitisation certificate prior to disposal. 	 Defining dedicated e-waste aggregation points is an operational matter for the landfill facility operators/e-waste service providers. The Regulations have capacity for an e-waste service provider to prove reasonable steps were taken to avoid storing for longer than 12 months. The department will monitor via compliance program activities and can amend times prescribed in the Regulations in line with operational feasibility. Amendment to provisions to reflect 'weight' of e-waste for recordkeeping have been made. Data storage and signage requirements are operational e-waste service provider responsibilities. The management of regulated e-waste responsibility is provided for in Regulation 9. Supplementary communications to stakeholders may involve more detailed information on e-waste management facets, like data sanitisation and certificates on sanitisation for medical devices. Reporting timeframes have been aligned to existing mechanisms.

⁶ https://www.charitablerecycling.org.au/wp-content/uploads/2020/08/Charitable-Donation-Bins_Voluntary-Code-of-Practice-2020-1.pdf (2020)

Stakeholder	Summary	Response
Australian Industry Group (Ai Group®)	 Request to clarify if significant businesses, such as retailers participating in product takeback as part of product stewardship or initiatives, would be classed as e-waste service providers. Concerns have been raised over the timeline for businesses to implement collection, storage and record-keeping under the Regulations in line with AS5377, and compliance with the standard will require time to train staff sufficiently and establish recordkeeping procedures. 	 The department confirms that a business or undertaking involving collection or receipt of regulated e-waste for storage, management, aggregation, treatment, processing, sorting, recycling, transfer or disposal are e-waste service providers. It is likely retailers as described would be captured under the Regulations. The department has considered provisions for significant entities, including simplifying recordkeeping requirements, and is currently developing communications to ensure clarity for significant entities. The department is also considering timelines and requirements of businesses to implement the Regulations, including if transition periods are required.
Australian Retailers Association	 National harmonisation needs to remain objective, particularly as some retailers classified as e-waste service providers operate across multiple jurisdictions. Detailed recordkeeping and storage requirements of larger business requires more time for training. A 12-month transition period is recommended, with encouragement rather than compliance during this time. Query if retailers involved in product stewardship programs are captured by the definition of 'e-waste service providers' with the additional obligations for these providers. Regulations should consider challenges on businesses, such as limited recycling partners, data security and reporting. 	 department is committed to continued national alignment, including under the National Waste Action Plan – Action item 3.97 Develop a common approach to restrict the disposal of priority products and materials in landfill, starting with lithium ion batteries, materials collected for the purpose of recycling, and e-waste. Retailers providing e-waste service provider activities will be captured and have the responsibilities under Part 3 – Division 1 under the Regulations. Recordkeeping requirements of larger business have been updated in the Regulations.
Charitable Recyclers Australia City of Greater Geraldton	 Funding has been provided for infrastructure, however, there are other costs associated with repair and reuse, including labour costs. Efficient extended producer responsibility schemes that better offset costs would see e-waste recycling costs reduced. Charities may see an increase in unsaleable e-waste items to be managed because of the ban. Charities are a key stakeholder to provide an unmet demand of quality goods for reuse and after repair, including bulky household goods. Request clarification on a number of operational matters. Request clarification on some parts of the regulations, for example, more information on "reasonable stope" magning. 	 The department acknowledges the work of Charitable Recyclers and notes that providing infrastructure grants is one e-waste management support measure required in the implementation of the ban. The department is working with the Australian Government on the e-stewardship initiatives and actions. The department is committed to continuing to work with charities and monitoring for situations where it is not economically or operationally feasible for charities to recycle e-waste they inadvertently collect. The department is responding to the City of Geraldton's queries directly and is developing a set of frequently asked questions to address queries raised during consultation and information sessions.
Department of Finance	more information on "reasonable steps" meaning. Significant business definition requires further refinements.	 A frequently asked questions list is in development and will likely assist. It will be published on the WA Government <u>E-waste ban to landfill page</u>. The department has made updates to the definitions for clarity, particularly significant entities.

⁷ National Waste Policy Action Plan Annexure 2022 (dcceew.gov.au)

Stakeholder	Summary	Response
	 Term 'treated' is not defined. Recordkeeping provisions and consider 'weight'. Significant businesses may not have capacity to record weight per annum. Medical devices under 50cm x 50cm x 50cm exclusion in Schedule. 	providers carrying out the recycling/treatment of e-waste.
	Vapes are not included in Schedule.	 Amendment to provisions to reflect 'weight' of e-waste for recordkeeping have been made.
	Could some small appliances be included in Schedule (e.g. toasters, kettles, sandwich makers etc.)	 The department notes business may need to confirm with their waste service provision department and providers if e-waste records are already captured, and how it might be required of providers to ensure recordkeeping compliance.
		 Smaller medical devices (WEEE directive-aligned sizes) are considered more suitable to include in the future ban phases. This is due to information on recovery pathways needing more definition; the many items in this category; possible low value, high recycling cost; and potential high risk of adverse outcomes to hospitals and hospital staff if captured in the initial ban.
		 Small household items will be considered for future ban scopes, including alignment with Australian Government action on Small Electrical and Electronic Equipment (SEEE). Broader waste education and community and business education⁹ work will continue to encourage Western Australians to take carriable e-waste items to their correct drop-off points for reuse, repair and recovery.
H Vangiessen	 Vapes requested to be included in the Household Hazardous Waste (HHW) Program. 	 The HHW program is administered by the Western Australian Local Government Association (WALGA) on behalf of the Waste Authority. All Australian Health Ministers have agreed to implement a nationally consistent
		and concerted response to vaping practice and implements.
		 The first stage of Australia's new vaping reforms commenced on 1 January 2024, including the Australian Government implementing a ban on the importation of disposable single use vapes.
National Environmental Law Association (NELA)		The department notes there are other measures underway to support policy waste management in Western Australia. This includes the current review Western Australia's Waste Avoidance and Resource Recovery Strategy 20
		and finalising the State Waste Infrastructure Plan. National collaboration with counterpart state governments is ongoing from government officer working group level, through to Environment Ministers' meetings.
	 Penalty threshold was mentioned and recommended to be increased. NELA called for a tiered penalty system. 	 Updates have been applied to the Regulations to clarify exemptions.
	NELA called for the general prohibition of disposal of e-waste to landfill by a person.	 The maximum penalty allowed for under the WARR Act is already reflected in the Regulations and is not able to be increased in these Regulations. The compliance program, including offence tiers, is in development.
	 Incentives to limit flow of e-waste into waste streams through reuse, recycling and reduction (outside of the Regulations) were suggested. 	Community education and communications activities to those not captured under the Regulations focus on encouragement, which is the State
	 The time when material becomes 'waste' is highlighted in regard to the storage time limit imposed in the Regulations for significant business and e-waste service providers. 	Government's preferred approach to implementing the e-waste to landfill ban.

⁸ Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE)

⁹ Take to drop-off points | WasteSorted

Stakeholder	Summary	Response
		Defining waste, or when a material becomes waste, is held under <i>Waste Avoidance and Resource Recovery Act 2007</i> and applies to the regulations.
Perth Airport	 Operational challenges where large business has various tenants operating in the one area may provide a challenge with compliance under the Regulations, particularly with any reporting required. E-waste service providers may charge higher rates due to the detailed recordkeeping requirements under Regulation 11. Reporting required of large business is logistically challenging and may be too resource intensive for employees if detailed categorisation information is required as written in Regulation 13. Streamlined reporting (i.e. total e-waste and description of types) is recommended for feasibility. Double counting of e-waste with tenants and contractors also needs consideration. Compliance for different business models and flexibility with regulatory operations is called for. 	 The department will provide communications and guidance for business and will address queries on reporting and recordkeeping requirements. The recordkeeping requirements in Regulation 11 have been aligned to other jurisdictional data recordkeeping methodologies for e-waste. They also apply to only a subset of total e-waste service providers. ¹⁰ The facilities that are operating waste industry services in Western Australia may already carry out mandatory annual reporting of waste data and other compliance reporting to the department. The department is developing e-waste Waste Data Online collection mechanisms with existing measures to ensure the annual reporting has minimal impost to operations. The department has provided a detailed schedule as called for by industry. Large business is to keep records. They may need to provide these records on request, using the six broad category groupings, a quantity (weight) per category and provide details of where it was transferred to. Communications and guidance will be provided to large business. Compliance programs, education and communications planning is ongoing. The department will be continuing to engage with business along the way to provide the required resources and information.
Ryan Oostryck	 Small to medium business should be included to make the Regulations effective and should also extend to households in time. Vapes requested to be included in Schedule 1 of regulated e-waste. Development of material recovery pathways for vapes is required. 	 The department notes the comments and will monitor the outcomes and review the entities and responsibilities of the ban, based on performance and evaluation. Aligned with the cost benefit analysis measures to ensure a practical approach and limit risk of adverse outcomes, the recovery of significant amounts of e-waste is the focus of the ban. In terms of vapes, all Australian Health Ministers have agreed to implement a nationally consistent and concerted response to vaping practice and implements. The first stage of Australia's new vaping reforms commenced on 1 January 2024, including the Australian Government implementing a ban on the importation of disposable single use vapes.
Shire of Carnamah	 Exemptions on flood or cyclones are required. Effective product stewardship is required to support all the costs of e-waste recycling. 	 Exemption provisions, regarding extraordinary circumstances, have been updated. The department continues to investigate options to help offset costs in the implementation of the ban not covered under scheme arrangements.
Waste Management and Resource Recovery Association Australia (WMRR)	WMRR calls for broader action on e-waste management, including increasing responsibility for producers and importers as measures outside of the Regulations.	The department is drafting supplementary information to provide alongside the Regulations to provide clarity to designated entities and their responsibilities under the Regulations.

¹⁰ E-waste service providers may hold a licence under the Environmental Protection Act Part V Division 3, for storing, treating or processing e-waste. <u>Licences and works approvals for prescribed premises | Western Australian Government (www.wa.gov.au)</u>

Stakeholder	Summary	Response
	 Clarity on intersection of designated entities and how requirements must be met is noted, including with recycling (materials and residual waste) and quantities for recordkeeping and reporting. Clarity with compliance and enforcement of the provisions was requested. Clarity for extraordinary circumstances is called for, as is a timeframe for the approval of exemptions requests. Education and communications must be presented in a clear and simple way for the list of regulated items in the Schedule. It should also provide details of the collection pathways. Batteries are a particularly important e-waste item to ensure communications are clear (e.g. embedded vs removeable) and consider B-Cycle messaging and avoiding contamination. 	 Amendment to provisions to reflect 'weight' of e-waste for recordkeeping have been made. The compliance program, including offence tiers, is in development. Exemptions have been updated. Timeframes for exemption decisions are not applied in these Regulations currently, which is consistent with other waste-related legislation. This includes the regulations for the plan for plastics and container deposit scheme. The department is committed to working with local governments and industry on communications regarding correct disposal options and locations, and how this information is provided to the broader community.
WALGA	 WALGA states the implementation of the landfill ban will have significant financial implications for local governments and the communities they service: Effective product stewardship is required as currently it does not cover all costs associated with e-waste recycling or all the items listed under the ban schedule. Regional local governments experience higher costs due to transport distances and limited economies of scale. Clarification required for: roles and responsibilities of local governments in terms of collecting and managing e-waste which landfills would be captured in the Regulations under the definition of licensed landfills provisions of source separation, including mixed waste. Timeline on decision-making for the exemption decision is not specified in the Regulations. E-waste recycling messaging requires active engagement with development and delivery. 	 The department is working with the Australian Government on e-stewardship development, including future regulatory scheme planning work. Exemptions to the Regulations now consider regional feasibility. Infrastructure grants have been provided to assist in costs associated with e-waste collection and management for stakeholders. Supplementary information will be provided to stakeholders (including local governments and licensed landfills) through direct communications (e.g. email contact) and via public information (e.g. FAQs). This will ensure parties are aware of their responsibilities under the ban, particularly where there is crossover between designated entities. Reporting requirements has been simplified and the department will continue to use existing mechanisms for reporting requirements. Timeframes for exemption decisions are not applied in these Regulations at this juncture, which is consistent with other waste-related legislation. This includes the regulations for the plan for plastics and container deposit scheme. Community education and communications activities will continue to include active engagement with local governments.
Western Metropolitan Regional Council (WMRC)	 WMRC notes concerns for financial implications in the absence of effective product stewardship schemes. Communicating items under the ban will be challenging. Clarification is required for provisions (e.g. reasonable steps with separation) was noted, and simplification of recordkeeping is required. 	 The department: is working with the Australian Government on e-stewardship development, including future regulatory scheme planning work. is committed to working with local governments and industry on communications regarding regulated e-waste items, correct disposal options and locations, and how this is provided to the broader community. has simplified reporting requirements and using existing mechanisms for reporting requirements.