



E-Stewardship Team

Department of Climate Change, Energy, the Environment and Water

via email: [estewardship@dcceew.gov.au](mailto:estewardship@dcceew.gov.au)

15 August 2023

To whom it may concern

In respect of the discussion paper *Wired for Change: Regulation for small electrical products and solar photovoltaic systems*, the consultation for which closed on 23 July 2023, please note that the Submission made by the Australia and New Zealand Recycling Platform reflects the views of the Australian Information Industry Association (the AIIA) and the Product Stewardship Working Group thereof.

The AIIA submitted responses to each of the Issues Paper that the Department published through its direct industry consultation.

If you have any questions about the views of the AIIA, please contact Rachel Bailes, Head of Policy, via [rachel@aiia.com.au](mailto:rachel@aiia.com.au) or 0406628060.

Best regards

Rachel Bailes  
Head of Policy  
Australian Information Industry Association

# ANZRP Response to Questions on the Proposal to regulate e-products

Your answers to the following questions will help us develop a fit-for-purpose regulatory product stewardship scheme.

There are 44 questions. You can use this document to submit an organisation-wide response with input from multiple people. When you have completed this document register your details at the [Have Your Say consultation page](#) and upload your submission by Sunday 23 July 2023.

## Introduction

1. I am a(n): **[Check up to 3 boxes below]**

☐ Consumer

☐ Recycler

☐ Manufacturer or distributor

☐ Industry body

☐ Retailer

☐ Academic

☒ Recycling scheme

☐ Commercial power generator

☐ Installer

☐ Other **[Explain in the text box below]**

2. How concerned are you about solar PV system waste? **[Check 1 box below]**

☒ Very concerned

☐ Concerned

☐ Neutral

☐ Unconcerned

☐ Very unconcerned

3. How concerned are you about waste from electrical and electronic equipment?

[Check 1 box below]

☒ Very Concerned

☐ Concerned

☐ Neutral

☐ Unconcerned

☐ Very unconcerned

4. Do you think government intervention (such as regulation) is needed for Australia to better manage small electrical products waste?

[Select **Yes**, **No** or **Maybe** from the **Choose an item** drop down below]

yes

[Type a response in the text box below if you answered **Yes** or **Maybe** at question 4]

ANZRP has been an approved co-regulatory arrangement under the NTCRS for 12 years. During this time, we have experienced the benefits of regulation in better managing TV, computer and printer waste such as:

- Avoidance of landfill disposal of e-waste which can contain hazardous materials.
- Increased recycling of valuable materials including precious metals and critical materials which avoided greenhouse gas emissions, energy and water usage and particulate matter emissions.
- Improved the transparency of e-waste flows and their hazardous materials.
- Prevented free-riders to create a more level playing field.
- Created domestic jobs in the e-waste recycling sector.

ANZRP supports the expansion of the NTCRS to include SEEE. This is a critical next step in creating a circular economy and further reducing e-waste associated with the consumption of electrical and electronic equipment in Australia.

Growing the program and broadening expectations for liable parties and community, creates a clear message, that with the consumption of goods comes a responsibility to plan for the management of e-waste in an environmentally responsible way.

The benefits of NTCRS expansion to SEEE include:

- Increased landfill diversion and increased recycling of e-waste.
- Setting and enforcing one standard for responsible collection, transport, and recycling of e-waste via a nationally consistent approach.

- Including more in scope products will raise awareness amongst community and encourage greater consumer consciousness, expectation, and participation from production to end of product life.
- Improved management and transparency of hazardous materials in SEEE.
- Prevent free-riders and create a level playing field.
- Achieve economies of scale to reduce costs.
- Create domestic jobs in the domestic recycling sector and provide certainty for investment in the industry.

However, the fundamental success of regulation is enforcement to ensure a level playing field. Any regulation must have a clearly defined and achievable enforcement framework that includes all scheme participants.

5. Do you think government intervention (such as regulation) is needed for Australia to better manage solar photovoltaic system waste?

[Select **Yes**, **No** or **Maybe** from the **Choose an item** drop down below]

Choose an item.

[Type a response in the text box below if you answered **Yes** or **Maybe** at question 5]

6. Do you think there is sufficient information available to consumers on how their choices can reduce e-waste and how to safely manage e-waste?

[Select **Yes**, **No** or **Maybe** from the **Choose an item** drop down below]

no

[Answer question 7 below if you selected **No** at question 6]

7. What additional information do you think should be made available to consumers?

[Check any or all the boxes below]

- ☒ Information on the difference my purchase and disposal choice can have on human health and the environment.
- ☒ Accessible information on how I can easily dispose of my unwanted e-waste.
- ☒ Easily understood information on the impacts if my e-waste goes to landfill.
- ☒ Information on the rules relevant to me in my state/territory and what I should do to comply with these rules.

☒ Other. Type a response in the text box below to explain.

We believe further promotion and awareness to consumers is essential to the viability of the program. It is also not just a question of sufficiency, but of consistency of messaging that needs to be addressed. Targeted information and/or marketing campaigns must be consistent with key messages coming from one peak body/organisation such as the Federal Government or the Scheme Administrator.

The investment being made by industry to ensure the production and sale of products is supported by a stringent program to reduce e-waste, should be known by the community. The success of the model relies on members of the public participating through member organisations supporting the idea of a circular economy. For example, the Officeworks BringITBack recycling program is a nationally consistent program which is now familiar and accessed by customers who understand the value of responsible disposal. However, many individual local councils around Australia provide and promote an e-waste recycling service which vary from council to council (e.g. product accepted, how e-waste is collected, service providers, messaging) and community understanding and take-up is variable.

Informing the public on the benefits of purchasing quality products is also essential to increasing consciousness in purchasing decisions. Consumers are after a reliable and independent source of such information, which can be provided by the proposed Scheme Administrator.

Choosing brands that last longer and can be efficiently repaired is far more economical than opting for fast, cheaper products. Awareness campaigns will benefit the broader recycling agenda.

8. Select one or more of the following objectives you think the scheme should focus on.

☒ [Check any or all the boxes below]

- ☒ Reduce waste to landfill.
- ☒ Increase the recovery of reusable materials.
- ☒ Provide convenient access to e-stewardship services across Australia.
- ☒ Support Australia's transition to a more circular economy.
- ☒ Foster shared responsibility across the lifecycle of covered products.

9. What objectives should be included or excluded? Type your response in the text box below.

A decision on areas of focus should be based on what has not worked well under the NTCRS.

The key objective that is not mentioned in the discussion paper is the need to improve compliance by co-regulators and recyclers. Non-compliant recycling practices – covering safety, environmental and commercial issues – are rampant in the NTCRS due to an insufficient enforcement of the scheme Rules by the Government and the Rules not covering requirements of recyclers. The primary objective of this scheme review should be to address this issue. We are very pleased to see the creation of a Scheme Administrator in the proposed scheme model who should have the ability and responsibility to set standards, approve scheme participants and monitor compliance. However, the discussion paper does not go into much detail on how the Scheme Administrator will report instances of non-compliance to the Government and what the Government will do to rectify non-compliance and penalise scheme participants who do not comply. Without enforcement, non-compliance will continue which will result in standards not being met, perverse environmental outcomes and potential harm to workers and the public.

While all the other points are also important, achieving high levels of recycling and recovery of materials and providing convenient access to the community will have the biggest environmental impact.

Clearly articulating the roles and responsibilities of all stakeholders to ensure clarity is also important to ensure success of the scheme - these include consumers, government (all levels), manufacturers, retailers and service providers.

## Scheme administration

10. Explain any concerns about the scheme model proposed in the discussion paper?

Type your response in the text box below. Text box could not display all text.

It is imperative that learnings from the current NTCRS model are incorporated into the new model. Over the last 12 years, ANZRP has operated a successful e-waste resource recovery scheme under the NTCRS. The evidence of success should form part of decision making in the new model. These lessons are a result of historical investment and assures stakeholders of the program's ongoing viability by building on this strong foundation.

ANZRP believes the proposed modification to include a Scheme Administrator and to have convenience/access targets is a positive step forward. However, there are some changes to the model that are not supported.

### Scheme Administrator

The Scheme Administrator should have responsibility for scheme governance, compliance monitoring and education and awareness to ensure a nationally

consistent approach and messaging, raise the standard of compliance and to reduce overheads.

However, the establishment of a Scheme Administrator will incur significant costs. The government spent close to \$1M in consulting fees to establish the NTCRS. ANZRP members also invested substantial sums to set up ANZRP (as would have other co-regulators). The discussion paper suggest that all costs are to be borne by the Liable Parties. We suggest that the Government needs to fund the establishment of the scheme to maximise participation by the Liable Parties. The alternative is to leverage the existing NTCRS scheme to reduce setup costs and time for the resource recovery function. This leaves the Scheme Admin to focus on setting up scheme governance, compliance and education.

### Convenience/Access Targets

Convenience/access targets and well-defined requirements to achieve them will also provide greater access to and therefore uptake by the community including in regional and remote areas. It will also result in an even playing field by co-regulators/Network Operators as some co-regulators under the NTCRS have only 5-10% of their collected volume through reasonable access sites (and the rest if via cheap, unregulated recycler sourced ('ad hoc') volume).

### A critical relationship - Liable Parties and Network Operators

We see the connection between Liable Parties and the Network Operator (who manages collection and recycling service providers) as critical to the success of the scheme. The disconnection of Liable Parties from collection and recycling service providers removes choice, competition, and brand agency- the choice to select a higher quality/environmental outcome in a cost-effective manner is removed. Management of e-waste and recycling programs is not fully evolved and innovation is needed to continuously test and improve methods and potentially create capability to further reduce e-waste. Competition is critical to this evolution as well as the ability to reduce costs over time.

Leading IT companies have already invested heavily in improving e-products to improve recyclability and establishing high quality recycling programs. Being 'lumped-in' with all SEEE OEMs (many of whom have taken no action in this area) and paying the same fees means that these leading companies will be subsidising those who have now become liable under the expanded program.

In the proposed model Liable Party fees are set by the Scheme Administrator yet there is no mention of the basis of this price setting in the consultation paper. As NTCRS in scope e-waste is generally cheaper to recycle than the broader category of SEEE there will need to be a recognition of this. We propose that differential pricing based on product categories is used by the Scheme Administrator as a key design principle.

In the proposed model the Scheme Administrator will be appointed by, and work for, the Government with performance measured on achievement of access, collection and recovery targets and compliance. Fees will be set by the Scheme Administrator to minimise their financial risk/exposure whilst ensuring these targets are met. It also means that Liable Parties will have no say or influence over how their products are managed at end of life and how their fees are being used to implement outcomes. This appears to create an effective monopoly that removes brand agency in developing and improving their product stewardship ambitions.

Standards are likely to be delivered to the lowest agreed level as there is no competitive tension to deliver above and beyond minimum requirements.

It is noted that Liable Parties are able to achieve some choice through either selection of approved 'additional' services (at a cost) from Network Operators, or via participation in an accredited, voluntary scheme. There is limited detail provided on these options in the discussion paper yet we see there are some major problems with this approach, namely:

- Procurement of 'additional' services by Liable Parties means they will still pay the full base cost to the Scheme Administrator, plus more. This will even further increase costs from those under the current NTCRS model. It is not clear if via this process a Liable Party can choose to have a Network Operator meet their full liability, or just provide some additional services. If the Network Operator is to service the full liability (our preference) then the fee setting and commercial relationship should be directly between the Network Operator and the Liable Party (with a service fee paid to the Scheme Administrator for whole of scheme governance, compliance monitoring and education and awareness).
- The assessment/approval process by the Scheme Administrator of 'additional' services will create more administrative costs (to be passed on to Liable Parties) and will substantially slow down/stifle innovation. From ANZRP's experience the Liable Party-co-regulator relationship is dynamic and constantly evolving to serve the Liable Party's needs. This should not be slowed down and limited by a third party approval process.
- The option to support separate 'voluntary' programs runs contrary to the overall aim of creating a nationally consistent, efficient, and effective approach to product stewardship. The effective management/governance of such voluntary programs, to ensure they meet the overarching scheme requirements, will take substantial time, skills, experience and resources to be done effectively. These voluntary programs will effectively be regulated if they are required to meet the same standards of the scheme – yet the process will be far more complex and costly due to the wide range of approaches pursued by the different voluntary programs.

Given the above, we recommend that one change is made to the proposed model – that the relationship between the Liable Party and Scheme Administrator is removed

and instead the relationship is between the Liable Party and Network Operators (i.e., the Liable Party joins and pays fees to the Network Operator).

### Geographic allocation

The proposed geographic allocation model is designed to address problems experienced in some remote and regional locations to secure a cost-effective collection service. It should be noted that the vast majority of e-waste is collected in metro locations where there is an abundance of competition and thus ample service available. An allocation model is not required in these areas.

The process of allocation of geographic areas is not clear in the discussion paper, the details of which will have major implications on the whole program. Our questions/concerns are:

- Under the NTCRS the vast majority of e-waste is collected directly by recyclers and is not controlled by NTCRS co-regulators (or regulated by the Government). This volume is then sold to co-regulators as 'ad-hoc' volume which co-regulators use to meet their recycling target. How does the Government propose to allocate an area to one Network Operator if there is already an established collection network (with existing commercial arrangements) already in place?
- How will the Scheme Administrator ensure that Network Operators don't 'cherry pick' profitable materials in their allocated area and avoid/minimise collecting less profitable materials?
- If a Network Operator is allocated a region, and assuming they are given an access/convenience target rather than a tonnage target, how will the Scheme Administrator manage the variable level of material collected? This will create significant risk on fee setting and funding availability which the Scheme Administrator is likely to address through inflated liable party fees to ensure they have sufficient cash flow.
- Any accredited voluntary program will have to compete for collections against Network Operators who have been allocated geographic areas. This will create duplication and inefficiency, and potentially increase costs as collection sites may demand rebates due to the competitive situation.

We suggest the solution to these issues is to continue the current competitive model in high volume areas where reasonable access is readily provided by competing Network operators.

Remote and rural areas where access is an issue will be tendered out to recognise the commercial reality of providing a service to these locations.

### Reuse

The proposed reuse collection requirements are potentially onerous and not cost-effective. Only limited information has been provided in the discussion paper so our comments are based on potential issues. Our key concern is that the obligation (and thus costs) of collecting/handling items for reuse fall upon the Network Operator. Based on our research only a small percentage of NTCRS items collected are suitable for repair or reuse (a larger percentage work, yet only a fraction of this has any commercial value).

Major changes will be required to current collection methodologies under the NTCRS to ensure any items that could be reused/repared are not damaged during the collection process. It should be noted that in the IT space there is significant ITAD (IT asset disposal) activities underway that divert reusable/repairable items away from the recycling stream. Where additional work is required by the Network Operator this will need to be paid for appropriately by the Scheme Administrator. Even then, as such costs will then be passed on to Liable Parties in their fees, the cost-effectiveness of such actions will also need to be carefully assessed.

11. What do you think are the key benefits from the scheme model proposed in the discussion paper? **Type your response in the text box below.**

There are clear benefits in the revised scheme model proposed in the discussion paper. The opportunity to rigorously monitor compliance of all scheme participants against high standards set and administered by the Scheme Administrator, will improve quality and environmental outcomes. The Scheme Administrator being able to approve recyclers who operate under the scheme is a great improvement as currently under the NTCRS there are no rules or requirements of recyclers leading to poor compliance levels.

The centralisation of compliance, governance and education will improve efficiency and consistency. Additionally, it will reduce duplication of effort and associated overheads.

The proposed model has the potential to lift standards of compliance by having an approval process to collect and recycle managed centrally by the Scheme Administrator. However, there is significant detail required to be determined on how compliance will be enforced should be addressed as a priority.

Other benefits include:

- Better access to collections across Australia in locations that are currently under-serviced.
- National coordination of education and awareness.
- IPR scheme inclusion.

- Expanded collection volume (and thus reduction in waste to landfill) which will drive investment in recycling facilities.
- Reduced free riders by creating a level playing field.

12. Is there a different scheme model you believe would be more effective?

[Select **Yes** or **No** from the **Choose an item** drop down below]

yes

If you answered **Yes** at question 12, type your response in the text box below to describe the model and its benefits.

The scheme structure needs to improve compliance whilst also maintaining competition at the right level. The proposed Scheme Administrator role is well placed to deliver on compliance improvements but is not well-placed to support appropriate competition and continual improvement.

We recommend a model that is a small, yet significant, variation to the one proposed by incorporating the following:

- 1 Liabe Parties are free to choose a Network Operator and pay fees directly to them to meet their liability requirements. The Network Operator pays a fixed (unit based) fee to the Scheme Administrator for compliance, governance, marketing, education and associated activities.

Healthy competition maintained at the right level, can only happen at the point when Network Operators compete for business. As with the current co-regulatory arrangement, Liabe Parties become a member/client of the Network Operator and pay fees to the Network Operator directly. The Network Operator will have varying points of difference including service experience, innovation, sustainability initiatives, security, governance, and pricing incentives.

Integral to the success of this approach is the role of the Scheme Administrator. Network Operators pay the Scheme Administrator a fixed fee as agreed. The Scheme Administrator governs and sets standards across the sector. This role ensures standards are high and incorporates compliance monitoring, reporting, education and awareness. Most importantly it creates a level playing field.

- 2 Problematic locations to provide collection services to are allocated via a tender process. Costs are borne by the Scheme Administrator and passed onto the Network Operators (assuming Network operators have a direct relationship with liable parties) via unit fee thus equitably sharing the higher costs of serving these locations. Targets are adjusted accordingly.

The concept of geographical area allocation for collection sites needs to be adjusted to only apply to areas that are currently not receiving an appropriate service. This would include many of the regional and remote locations, and potentially some states such as WA and TAS, where collection and recycling costs are substantially higher than the other metro areas.

Convenience targets should be used in allocated areas where collections services are deemed insufficient. Such targets would not be required in metro areas where there is already ample competition and services available.

## Liabe parties' responsibilities

13. Do you agree that only first importers and producers should be liable parties?

[Select **Yes** or **No** from the **Choose an item** drop down below]

yes

[Answer question 14 below if you answered **No** at question 13]

[Answer question 15 below if you answered **Yes** at question 13]

14. What other participants in the supply chain should be considered liable parties, and why?

Type your response in the text box below.

15. The Scheme administrator is responsible for setting fees paid in advance by liable parties. If any, describe what role government should have in setting fees?

Type your response in the text box below.

Government (and the Scheme Administrator) should not set fees. This should be done by the Network Operators (who can adjust their fees year on year in line with changes to costs for logistics and recycling and changes to commodity prices). This is the most cost effective method and will avoid build-up of reserves. Network Operators should have requirements to transparently report their fee/pricing models.

The role of Government in setting fees is to ensure transparent reporting of fees to ensure they are providing value for money.

16. How could eco-modulated fees be incorporated into the proposed scheme?

Type your response in the text box below.

Eco-modulation has proven to be difficult to incorporate into product stewardship schemes overseas. The administrative overhead to assess products is likely to exceed the quantum of discount that could be viably offered through the scheme.

It should also be noted that Australia is a very small market and product design decisions are made at a global scale with more attention given to much larger market. Other methods such as consumer education are better suited to encourage better product design.

17. Financial reserves will accumulate from the fees collected from liable parties for solar photovoltaic (PV) systems because there may be decades between when the products are placed on market and when they become waste. If any, describe what role government should take in managing these funds.

Type your response in the text box below.

These funds can be unlocked to help develop circular economy initiatives with government guaranteeing the availability of sufficient funds based on forecasts of recycling volume in any given year. On shore processing facilities and downstream industry creation could be supported.

## Scope

18. Are there any small electrical and electronic equipment products you believe should not be covered under the scheme?

[Select **Yes** or **No** from the **Choose an item** drop down below]

yes

[Answer question 19 below if you answered **Yes** at question 18]

19. Which products and why? Type your response in the text box below.

Equipment that is high risk to handle and process from an health, safety and environment (HSE) perspective should be excluded.

While this looks to be the intent the issue remains, this will result in consumer confusion as to what the scheme covers. The exclusion of any small electrical and electronic equipment products requires clear communication at point of collection.

20. Are there small electrical and electronic equipment products that you would like to see added to the list of included products in the discussion paper?

[Select **Yes** or **No** from the **Choose an item** drop down below]

no

[Answer question 21 below if you answered **Yes** at question 20]

21. Which products and why? **Type your response in the text box below.**

22. Can you suggest a better method than Harmonised System (Import) codes for defining in-scope products? **Type your response in the text box below.**

We support the continued use of standardised Harmonised System (HS) Codes to define in-scope products. However, we encourage the development of a strategy to clearly communicate the rationale for which are included, for the purposes of evaluation.

23. Should the scheme cover all parts of a solar PV system?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

Please explain. **Type your response in the text box below.**

24. Are there any products, or specific solar PV products, that should not be covered?

**Type your response in the text box below to explain which products and why?**

Battery Storage systems can be handled by the existing battery stewardship scheme.

25. What do you think are the pros and cons of including, within the scheme, large format energy storage batteries which are attached to solar PV systems?

**Type your response in the text box below.**

Pro's are that all the equipment is covered by one scheme

Con's are the different handling and processing requirements between panes and energy storage. A streamlined panel collection system is needed, this could include inverters but batteries are much heavier and have safety issues associated with handling, storage and processing that PV panels do not.

26. It is proposed the scheme will cover batteries that are embedded in small electrical and electronic equipment but not loose batteries (e.g. AAA batteries). Do you have any concerns regarding the scheme approach to waste containing embedded batteries?

[Select **Yes** or **No** from the **Choose an item** drop down below]

yes

[Type your response in the text box below if you answered **Yes** at question 26.]

Embedded batteries are an important consideration within the e- stewardship discussion, not only for their use of non-renewable resources, but also for the associated safety and fire risks.

An important HSE consideration is handling safety, to mitigate the risk of fire hazard. This should be addressed through ensuring approved collection sites and recyclers have appropriate HSE systems and required regulatory approvals in place.

## Targets and obligations

27. Do you believe that the set of targets and obligations detailed in the discussion paper are appropriate for a product stewardship scheme which covers small electrical and electronic equipment?

[Select **Yes** or **No** from the **Choose an item** drop down below]

no

[Answer question 28 below if you answered **No** to question 27]

28. What changes would you suggest to the proposed targets and obligations?

[Type your response in the text box below.]

We propose convenience be used as the principal driver for collection to provide equitable access to e-waste stewardship services.

A convenience-based model including a Scheme Administrator (with clearing house functionality for locations that are expensive/difficult to provide collection services to) would allow the Government and all stakeholders to build on the strengths of the NTCRS rather than implementing a new model from scratch. This approach reduces risk for all stakeholders, accelerates the timeline to implementation, reduces implementation costs and will deliver better policy and service outcomes.

We do not support a scheme collection target for SEEE or NTCRS. This is because collection targets have the following issues:

- In the early years of the NTCRS, there was a significant issue when one co-regulatory arrangement met its collection target in the middle of the scheme year and then suddenly turned its collection network off and stopped picking up collected in-scope product from council collection sites. This meant councils were left with stockpiles of e-waste which they had to manage and pay for to get responsibly recycled (an unbudgeted expense).
- Currently under the NTCRS, co-regulatory arrangements use 'ad hoc' volume to meet their collection/recycling target. This is where they pay recyclers for certificates of destruction for recycling e-waste that they have collected themselves through their own collection channels/B2B customers (i.e., not through sites/networks managed by co-regulatory arrangements). This means that co-regulatory arrangements are purchasing certificates (and recyclers are trading them without any oversight by the scheme regulator); most do not do any due diligence to determine that the tonnage on the certificates is 'true', e.g.:
  - Tonnage has not been double counted (i.e., a recycler sells the same certificate to multiple co-regulatory arrangements)
  - Tonnage is correct/accurate (e.g. has been weighed and recorded correctly, has not been 'made up')
  - Tonnage is for in scope product (not out of scope product)
  - Tonnage has not undergone pre-processing at a facility not certified to AS/NZS 5377
  - Recycling was performed in accordance with AS/NZS 5377 and relevant health, safety and environment regulations.
- Placed on market collection targets require regular updating of scaling factors (to account for waste product exported for reuse or waste product that does not result in the purchase of new product) and converted weights (factors to convert units of product imported to tonnes of product imported) for them to be accurate and stay in step with light weighting of products.
- Initially the NTCRS had separate targets for TVs and computers/printers. However, it was found to be too difficult to achieve across each category. The result is that to achieve weight targets the OEMs of light products like computers and printers are subsidising the OEMs of heavy products like TVs which are generally more expensive to collect and recycle.

29. Do you think the set of targets and obligations detailed in the discussion paper are appropriate for a product stewardship scheme which covers solar PV?

**[Select Yes or No from the Choose an item drop down below]**

Choose an item.

[Answer question 30 below if you answered **No** at question 29]

30. What changes would you suggest to the proposed targets and obligations?

[Type your response in the text box below.]

## Transitional arrangements for legacy waste from large-scale PV systems

31. Do you agree it is appropriate that owners be responsible for covering the cost of managing all legacy waste from large-scale commercial solar PV systems (100kW and above?)

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

[Answer question 32 below if you answered **No** at question 31]

32. What alternative do you suggest? [Type your response in the text box below.]

33. Do you think it is appropriate to impose a mandatory requirement on owners of large-scale solar PV systems (over 100kW), built before the scheme commenced, to provide information about how they are managing waste?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

[Answer question 34 below if you answered **Yes** at question 33]

34. What information should owners of large-scale solar PV systems, built before the scheme commenced, be required to provide to the Scheme Administrator?

[Check any or all boxes below]

- ☐ Serial Numbers of deinstalled solar panels, inverters, and batteries.
- ☐ Information on the organisation/s that are responsible for the decommissioning of these systems.
- ☐ Information on the organisations that are recycling the waste from these systems.

- ☐ Information on reuse or export of products.
- ☐ Information on the disposal of these systems in landfill.
- ☐ Other. **Type your response in the text box below.**

**[Answer question 35 below if you answered **No** at question 33]**

35. Explain why not. **Type your response in the text box below.**

## Scheme arrangements for solar PV

36. The paper suggests less than 100 kW capacity as the definition of small-scale solar PV systems eligible for free services (where they were installed prior to the scheme commencing).

What definition do you suggest from the list below? **[Check 1 box below]**

- ☐ 0-15 kW (predominantly households)
- ☐ 0-50kW (mostly households and small business)
- ☐ Agree with the less than 100kW proposed (households and businesses)

37. How can the Scheme make collecting and transporting waste from PV systems convenient, efficient and cost-effective for electricians and PV system installers?

**Type your response in the text box below.**

38. What are the minimum requirements that should be set for a collection site to accept PV systems? **Type your response in the text box below.**

39. Should requirements differ between types of hosts? (For example, for those hosted by local government and those hosted by PV distributors). **Type your response in the text box below.**

40. How could the Scheme provide incentives for recyclers to recover more valuable material over time and ensure safe management of hazardous material from solar PV systems?

Type your response in the text box below.

41. The Scheme could allow liable parties, that have imported or produced solar PV systems and components, other options to manage their liability. This could apply when components are used in a large-scale solar project, such as solar farms. These options involve either the liable party or the owner of the large-scale project providing a decommissioning plan and bond, which would allow the financial liability to be met over a longer time frame.

Do you think this approach is appropriate?

Select **Yes**, **No** or **Not sure** from the **Choose an item** drop down below

Choose an item.

Answer question 42 below if you answered **Yes** or **Not Sure** at question 41

Answer question 43 below if you answered **No** at question 41

42. If the owner chooses other options to manage their liability the liable party could be exempt from paying upfront fees to the Scheme Administrator for some components. Which of the following requirements should apply for the Scheme Administrator to provide an exemption?

Check any or all the boxes below

- ☐ The products or components where an exemption is being sought, must solely be used in a large-scale solar PV system project, such as a solar farm.
- ☐ A decommissioning plan that details how the system will be decommissioned, in-scope products will be recycled, and residual and hazardous waste will be managed must be provided to the Scheme Administrator.
- ☐ A plan of how requirements of the scheme that would otherwise apply would be met. For example, obligations under the scheme.
- ☐ A plan on how the commitments of the decommissioning plan will be transferred if the system is sold before decommissioning.
- ☐ The owner provides an appropriate bond, surety or guarantee for the commitments made in the decommissioning plan.
- ☐ ☐ Other (please specify)

43. Explain why not. Type your response in the text box below.

44. Are there any other comments you would like to make in response to the paper?

Type your response in the text box below.

We acknowledge there is much detail yet to be defined. However, there are key elements and detail that must be reviewed to ensure the best scheme structure is created.

We suggest a clear statement of issues from the current NTCRS and solutions proposed, would make the benefits more readily understood and potentially accepted. This would also assist with transparency in scheme design.

Liability Party/member investment over the last 12 years in the NTCRS and more particularly in ANZRP has been significant. Over \$130 million has been invested by ANZRP members to establish and deliver a world-class e-stewardship service involving a national collection network, compliant recycling, downstream traceability, transparent pricing, reporting and investment in recycling.

Our members' commitment to do more than the minimum NTCRS requirements marks them out as leaders in the sector. Their actions reflect their commitment to sustainability and development of a circular economy. It also demonstrates that they consider the NTCRS to be a true extended producer responsibility program and not just a regulatory requirement or 'government tax'. Key benefits that ANZRP and its members provide include:

- Raising the standards of e-waste recyclers by requiring approved recyclers to undergo an independent audit focusing on AS/NZS 5377 conformance, HSE legal compliance, HSE risk management and modern slavery/fair work conditions and working with them to implement corrective action plans.
- Implementing a national collection network which includes and supports regional and remote Australia.
- Assessing the HSE practices across our collection network and helping them to improve performance such as requiring them to store e-waste on hardstand and under cover, assisting them to complete e-waste handling risk assessments and to meet our packing and loading requirements consistent with Heavy Vehicle National Law (HVNL) chain of responsibility requirements. Using over 40 logistics providers to move e-waste across the country and assessing their HSE practices including meeting HVNL chain of responsibility requirements.
- Investing over \$3 million in the recycling industry via the mobile e-waste factory and the plastics extrusion project.
- Conducting a life cycle assessment annually which demonstrates that the TechCollect program has collected and recycled over 240,000 tonnes of e-waste which is equivalent to preventing over 330,000 tonnes of CO<sub>2</sub>e emissions from entering the atmosphere.

<END>