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Dear Mr Merrick

**Re: Draft Queensland E-Products Action Plan 2023–2033**

Thank you for the opportunity to provide feedback on the *Draft Queensland E-Products Action Plan 2023–2033*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,000 members from over 500 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and NGOs.

Meeting the 2030 target of 80% resource recovery poses a significant challenge for Queensland given the consistently low resource recovery rate across all streams. Queensland will need to recover an additional two (2) million tonnes over the next seven (7) years to meet this target. In the absence of significant investment in resource recovery infrastructure beyond municipal waste, and emphasis on market development for secondary raw materials, including a strong emphasis on procurement of recycled materials by government, it is unclear how Queensland's resource recovery targets and the linked economic (jobs) and environmental (carbon mitigation) benefits can be achieved, nor Queensland's desire to achieve a circular economy.

WMRR recognises the significant research that has gone into the report and commends the department for taking a proactive approach towards addressing the challenges posed by electronic waste. WMRR believes that the plan will lend itself to continuing to educate and change the behaviour of Queenslanders. The plan's focus on circular economy principles, behavioural change and education (linked to consumption and disposal), product repairability and stewardship schemes do not appear to have been articulated as strongly in the later actions section of the plan. Although the actions listed are achievable WMRR would encourage Queensland to move up the waste management hierarchy (the current focus on repair is not sufficient) to promote avoidance and reduction behavioural change, as well as addressing design issues (durability, material selection, design for disaggregation, ease of repair and recyclability).

WMRR's feedback on the plan and actions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

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Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan

**Chief Executive Officer**

Waste Management and Resource Recovery Association of Australia

**Submission**

<p><b>Reduce and repair</b> <i>Extending the life of e-products: Assisting consumers repair and reuse more e-products</i></p> <ol style="list-style-type: none"> <li>1. Identify and address gaps in community access to reuse, repair and e-products sharing in regional, rural and remote areas, including the need for government funding and investment. (1,2)</li> <li>2. Mobile repair service to travel to regional Queensland with focus on rural and remote areas. (1,2)</li> <li>3. Training—Up-skilling and re-skilling. Training specifically on repair of appliances, ICT and consumers electronics. (1,2)</li> <li>4. Training—continuing education for existing electrical and electronic trades to build capabilities in repair specific knowledge and skill. (1,2)</li> <li>5. Government cash rebates/contributions/subsidies to support the repair of e-products. (1,2)</li> <li>6. Co-investment and grants to support the development of a manual/ guide for ‘Setting Up a Repair Café’ in partnership with LGAQ. (1,2)</li> <li>7. Government grants to seed fund the creation/ implementation of a repair café in every Queensland region with support from LGAQ. (1,2)</li> <li>8. Establish a Reuse and Repair Research Centre in collaboration with universities and relevant industry bodies. (1,2)</li> <li>9. Queensland Government should closely monitor and support the implementation of relevant recommendations from the Productivity Commission Inquiry on the Right to Repair, e.g. repairability star rating. (1,2)</li> <li>10. Comprehensive singular source of consumer and business-friendly waste avoidance and waste reduction information on where, how and why to reuse, repair and recycle e-products as well as information on sharing, leasing and ‘buying better’.</li> </ol>	<p>Education and behavioural change campaigns to-date have struggled to raise the need to consider consumption habits and take responsibility for the waste material we create (whether as an individual, government, company, facility, etc., and think beyond the collection and disposal costs), including where discarded materials and products end up once discarded. This plan provides Queensland with the perfect opportunity to develop these campaigns and address this behaviour.</p> <p>While WMRR applauds the repair pathways map we would encourage the department to map the life-cycle pathway (including the financial cost of full life cycle) of e-products against the entire waste management hierarchy not just from repair. This will enable Queensland to develop actions that are not solely focused on end-of-life management and disposal. The current narrow focus of the repair pathway in the plan assumes that all consumers will consider repair and does not address the costs or behaviours that lead consumers to consider this or other options such as avoidance and/ or share/hire.</p> <p>WMRR cautions Queensland’s assumption that repair is always more efficient noting that the cost of repairs for some e-products are higher than buying new items and refurbished items may not meet consumer expectations. The absence of considering a hiring/ lease model also fails to consider the new industries that can be developed when looking at products as a service.</p> <p>WMRR cautions the department stating that the circular economy principle ‘designing out waste and pollution’ is being addressed through these actions, WMRR would say that the actions are not sufficient to meet this standard, given that the onus is on consumer behaviour influencing</p>
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	<p>producers rather than producers being held responsible/ accountable for design decisions, life cycle costs (and infrastructure), alternative ownership pathways, etc.</p>
<p><b>Consumer empowerment</b>  <i>More responsible consumption and use</i></p> <p>11. Education to inform, engage and activate consumers to choose well and make it last. Partner with existing product stewardship schemes and programs e.g. NTCRS co-regs, Mobile Muster, B-Cycle, C4PA. (1,2,3)</p> <p>12. Equip e-products retailers with educational materials to buy better, choose well and make it last. (1,2,3)</p> <p>13. Partner with key channels and stakeholders to support education for consumers to buy better, choose well and make it last, e.g. LGAs, LGAQ, NTCRS coregs, MobileMuster, B-Cycle, C4PA, National Retail Association, Australian Retailers Association, ACOR, WMRR. (1,2,3)</p> <p>14. Develop incentives/rewards for consumers to buy better, choose well and make it last. For example, vouchers, rebates, product subsidies, etc. on relevant e-products for set time periods. (1,2,3)</p>	<p>WMRR would encourage the department to further investigate e-product consumer behaviour and business models (eg unnecessary product upgrades based on trend) and focus on developing actions to mitigate or respond to these such as education campaigns promoting rethinking, re-use and avoidance. By focusing actions on ‘choosing well’ the plan has the risk of supporting over consumption behaviours (in the absence of considering different business models), and therefore runs the risk of creating a supply of repaired products/ recycled material with no consumer demand if the desires of consumers are not understood and addressed.</p> <p>Education for retailers will have limited effect if manufacturers are not held responsible for the products they design and supply to market, similarly nor will changing consumer behaviour through government incentives. As the plan notes the only way to truly affect design will be through mandated Extended Producer Responsibility (EPR) schemes. These schemes are not only logical and have been proven globally and locally to be successful, they provide moral, legal, and financial imperatives for product manufacturers to take responsibility for the products they create throughout the product’s lifecycle. This policy approach has the potential to drive a paradigm shift in the creation of products at first instance, with greater thought and emphasis given to material selection and product design to minimise the costs associated with total lifecycle management.</p> <p>There is limited obligation on e-waste producers in Australia to truly fund and manage end-of-life, including the creation of markets for these materials at end of life. The existing actions rely heavily on local councils and charities to take responsibility for these items to avoid them being landfilled with limited regulatory or financial assistance. This is simply transferring risk</p>

	<p>and cost and will not create the systems changed required to be successful in designing and managing these products through their life cycle.</p>
<p><b>Procurement</b> <i>Extending the life of e-products—drive greater durability, repairability, reuse and refurbishment through business and government procurement</i></p> <p>15. Incorporate specific product stewardship and circular economy requirements for all government procurement across all departments, agencies and authorities. This should include elements such as attention to repairability, durability and recyclability, referencing specific services, features and support programs. (1,2)</p> <p>16. Attention to sustainable materials including recycled and recyclable content, renewable materials, elimination of unsafe chemicals and hazardous substances, and materials with low embodied energy and carbon emissions. (1,3)</p> <p>17. Product warranties that directly contribute to extending product life and avoiding premature product disposal or upgrades service arrangements and attention to take-back services and programs that cover reuse, repair, upgrading and/or recycling and diversion from landfill. (1,2)</p> <p>18. Fund and provide expert technical advice to a relevant industry/ business body such as the Chamber of Commerce and Industry Queensland to develop an E-products Sustainability procurement program that includes a ‘How to manual for SMEs’, as well as outreach and training for businesses on how to procure low and no-waste e-products. (1,2,3)</p> <p>19. Conduct a review to establish which government departments, agencies and authorities are high volume consumers of e-products and ensure these are supported as a priority for sustainable e-product procurement reforms. (1,2,3)</p> <p>20. Information and guidance about TCO Certified and EPEAT programs to support government and private sector procurement. (1,2,3)</p>	<p>WMRR advocates for procurement targets that incorporate circular economy principles into everything not just e-product procurement, across all levels of government and business. A model procurement policy should be developed for Queensland that can be adopted across government and business, that includes these principles for e-waste and goes beyond to require genuine assessment of true lifecycle costs (including repair, replacement, upgrade, warranty period, and end of life costs, as well as carbon impact). Further the true cost should not be minimised using charities or NGOs as a proposed pathway for repair/ reuse- these services must be provided with fair and equal payment for their valuable services.</p> <p>Targets should be set for Action 16, specifically for designing out hazardous materials and the use of recycled materials to create local demand for these materials. Education and engagement programs will be needed to support the adoption of targets and new procurement measures.</p> <p>WMRR assumes that this will be a whole of government policy that will provide the ability for the Queensland government to update consumer law to place greater obligations on producers to extend and support product lifespan, noting that there is already an obligation to repair, replace and refund for major fault, that is not well understood by the community. A number of European jurisdictions have placed positive regulatory obligations on producers to align warranty period with lifespan of the goods.</p> <p>WMRR supports addressing gaps in e-waste collection points across the state, by ensuring that genuine EOR schemes are developed with state coverage and are properly funded by generators. For this reason, we need to move away from voluntary and co-regulatory schemes that are not</p>

<p>21. Develop and implement a market development program for e-products with a focus on recovered materials from e-waste and especially plastics. (2,3)</p> <p>22. Identify and address gaps in community access to e-waste collection points in regional, rural and remote areas, including the need for government funding and investment. (2)</p>	<p>properly funded and result in reduced end of life coverage for products outside of metropolitan regions that have no difficulty being sold/ delivered at the same cost in these areas. Government needs to consider how logistics can be utilised to reflect not only distribution of these products at start of life to these areas but also collection at end of life (reverse logistics).</p>
<p><b>Infrastructure and transport</b> <i>Optimise resource recovery—collection, handling, processing</i></p> <p>23. Regionally-based transport and logistics coordinators in local government to optimise the collection, transport and recycling of e-waste in regional, rural and remote areas. (2)</p> <p>24. Establish e-products triage systems at aggregation sites to assess e-products with a view to optimising reuse, repair, and recycling outcomes, including options for preliminary processing and pre-treatment facilities in regional, rural and remote areas. (2)</p> <p>25. Increase recycling capacity. (2)</p> <p>26. Co-fund and invest in technologies to process e-waste plastics recycling in Queensland. (2)</p>	<p>As mentioned in the point above, government needs to ensure that schemes are fully funded and utilise reverse logistics to ensure appropriate regional and rural coverage. Whilst this may also need to utilise existing local government infrastructure (eg tip shops and transfer stations) to assist with cost mitigation, it should not result in the transfer of cost and/ or risk to local government, rather it should be on a fee for service model to ensure that the system is economically sustainable and viable. There is a terrific add on that could occur with these locations if done well with men’s sheds, repair cafes, etc, however this must only be ancillary to a properly funded robust model that maximises the life cycle of such products.</p> <p>WMRR cautions increasing recycling capacity in the absence of an EPR system for e-waste, as this will result in insufficient closed loop demand for recycled materials or products. This creation of recycling infrastructure (irrespective of location) must be viewed as part of a holistic system and not simply moving products to the next step in the chain and creating further stockpiles.</p> <p>Returning to the design piece e-products need to be seen as a valuable resource, this will support consumer behaviour to collect these items and for manufactures to utilise recovered materials. As already stated, Queensland can lead by example through setting targets and procurement amendments.</p>

**Policy and regulatory reforms**

*Stop recyclable e-products ending up in landfill—which e-products and when*

27. State planning approvals for utility PV to require fully funded end-of-life solutions including setting durability, reuse, material recovery and landfill diversion targets. (2)

28. Review and revise relevant Queensland laws to remove barriers to increased level of repair while ensuring product safety is maintained. (2)

29. Queensland Government closely monitor and support implementation of relevant recommendations from the Productivity Commission Inquiry on the Right to Repair, e.g. repairability star rating. (2)

30. Mandatory national product stewardship scheme for PVs. (1,2)

31. Expand the NTCRS to include large household appliances, temperature exchange equipment, other small equipment. (2)

32. National regulation of Mobile Muster and expand scope to include modems and routers, digital set-top boxes, landline phones, wearables and smart home devices. (2)

33. Mandatory national product stewardship scheme for lighting equipment. (2)

34. Ban the disposal of electrical and electronic equipment including PVs from landfill where industry-funded product stewardship schemes are in place and available. (2)

35. Establish cross agency/department working group to ensure adoption of relevant actions across all relevant areas of the Queensland Government. (1,2,3)

WMRR recognises that Queensland has adopted the Federal Government’s categories for e-products and supports nationally aligned and funded product stewardship schemes. Victoria, SA and most recently WA are each working to address issues with e-waste and WMRR encourages Queensland to work with the federal and other state governments on harmonised schemes and avoid the mess and confusion that has been created nationally with states taking their own distinct approach to single use plastics for example.

Successful landfill bans require supply chain intervention and genuine alternatives for disposal. Before proposing a landfill ban, Queensland must ensure there is an integrated WARR system that has the processes, infrastructure, and pathways to collect and recycle/reprocess banned materials, and importantly, the end markets to consume recycled materials. Simply imposing a landfill ban without established comprehensive and effective product stewardship schemes and end markets will have the unintended consequence of stockpiling these materials that have no home, and worse lead to illegal dumping.

WMRR would also query the definition of “recyclable e-products”, when there is very little market demand or infrastructure for these products at present, as evidenced by solar panels. We must go beyond technically recyclable to actually recyclable at scale in Australia with clear evidence of being able to get the products to both the recovery facility and the market where there is demand for the resultant product and materials.

Queensland should consider mandating minimum design requirements for recycled material content in products and recyclability and disassembly in order that valuable materials in these devices can be recovered and re-used at lesser cost- which can be supported by eco-modulation of EPR fees within schemes.