

21 July 2023

Kate Lynch
Division Head, Circular Economy
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

Via email: estewardship@dceew.gov.au

Dear Ms Lynch

Regulation for small electrical products and solar photovoltaic systems

The Australian Local Government Association (ALGA) welcomes the opportunity to make a submission to the Department of Climate Change, Energy, the Environment and Water regarding the proposed development of a regulatory product stewardship scheme for small electrical and electronic equipment and solar photovoltaic (PV) systems.

ALGA is the national voice of local government in Australia, representing 537 councils across the country. In structure, ALGA is a federation of State and Territory Local Government Associations. This submission should be read in conjunction with any separate submissions received from State and Territory Associations as well as individual councils.

Recovery rates for small electrical and electronic equipment (SEEE) are low at 8%, with PV systems even lower at 6%. Managing end-of-life outcomes for SEEE and PV waste costs councils and communities millions of dollars per year while manufacturers largely pay nothing. ALGA supports intervention to make industry responsible for end-of-life recycling of their products.

ALGA's recommendations to support an effective product stewardship scheme include:

- Mechanisms to ensure regular, clear reporting by the Scheme Administrator, to assist liable parties, collectors, recyclers and local governments to ensure the scheme is operating effectively, determine if types of electronic waste outside the scheme should be included and verify remote communities are, in fact, able to participate in the scheme.
- A clear and accessible process for adding additional products to the scheme is required. This would support circular economy outcomes and reduce liabilities on collection points.
- Safeguards to ensure that the Scheme Coordinator and Network Operator take all eligible materials. Under other schemes, councils have been forced to manage the disposal of materials when collection has not occurred due to transport distance, limited accepted products or targets having already been met.

- Complementary planning processes need to ensure that there is sufficient recycling infrastructure and end markets for materials collected through the Scheme. This would prevent stockpiling of potentially hazardous materials.
- Prescribed fees payable by liable parties need to reflect the true cost of collection and processing of e-products for the whole of Australia including regional and remote Australia. All contingencies should be accounted for, including collection site management including litter, traffic management etc, secure storage containers (for remote areas where the container may be unattended), and transport of containers (both to and from).
- The Scheme or complementary measures will also need to address PV waste from the commissioning phase of large-scale solar installation. The transport and installation of PV panels may result in a large redundancy of panels due to damage.
- Education of suppliers and consumers on end-of-life management of products will be key to the success of the Scheme.

ALGA is very supportive of the proposed regulatory approach to product stewardship for small electrical and electronic equipment and solar photovoltaics. This proposal potentially addresses a [number of concerns](#) local government has with the existing National Television and Computer Recycling Scheme. We look forward to further consultation as the Scheme develops.

Should you require any further information in relation to the matters raised in this submission, please contact Denise Anderson on 02 6122 9400 or denisea@alga.asn.au.

Yours sincerely,



Cr Linda Scott
ALGA President