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Dear Ms Gilbey

AUSTRALIAN MOBILE TELECOMMUNICATIONS ASSOCIATION (AMTA) RESPONSE TO THE CONSULTATION REGULATORY IMPACT STATEMENT (CRIS) FOR TV'S AND COMPUTERS

AMTA's preferred model from the CRIS is **Option 8 – Mandatory Import Licence Requirement.**

This option will maximize industry participation and environmental outcomes while minimising government regulation and intervention, providing a sound foundation for an effective national e-waste product stewardship scheme.

AMTA considers that options 4 – Commonwealth Based EPR and Option 6 – Commonwealth Excise Levy would deliver similar outcomes.

AMTA also recommends that the applicability of these options be considered for other e-waste streams including mobile phones.

Key Outcomes Sought by AMTA include

- Commonwealth not State Based Regulation
- Broad Protection from Free Riders
- Industry not Government Managed & Funded Schemes
- Industry Specific not Single/Combined PROs
- Industry Developed and Government Endorsed Targets
- Recycling Free to Consumers at point of disposal
- National, Systematic and Regular Collection of e-Waste

BACKGROUND TO MOBILEMUSTER

AMTA is responding to the CRIS to share its learning's in running an electronic product stewardship scheme for the past 10 years, ensure that any regulations put in place are suitable for other electronics, and also to highlight our vision for the future management of e-waste nationally in Australia.

MobileMuster is the official mobile phone industry recycling program and has been in operation since late 1998. It is the only national product stewardship scheme for electronic products in Australia.

MobileMuster is a world leading industry product stewardship scheme that is funded and managed by the majority of handset manufacturers and all network service providers.

The key features of the MobileMuster program are

- Industry funds all elements of the program
- Accepts all brands of mobile phones and accessories
- Free to consumers at the point of disposal
- Nationwide collection network which is easily accessible
- Variety of collection methods (i.e. retail, kerbside, reply paid mailing satchel)

MobileMuster's key achievements over the past 3 years are

- Increased collection rate of estimated discarded phones to 36%
- Increased awareness of mobile phone recycling from 46% to 79%
- Reduced the incidence of people throwing out their old mobile from 9% to 2%
- Increased collection rate of net imports from 3% to 8%

Key learning's from MobileMuster in managing a leading e-waste product stewardship scheme include:

- Major driver for participation is educating consumers that (a) they can recycle, (b) why they should recycle and (c) how to recycle
- E-waste is not a top of mind issue, as consumer deal with their e-waste only once or twice a year not weekly or monthly
- Most people recycle via kerbside - retailers play an important role in educating consumers about recycling and collecting mobile phones, however dropping off at retailers is counter intuitive to current waste and recycling behaviors'

- Collection points and methods need to be accessible, convenient, simple, free and obvious
- Marketing aimed at increased awareness and 'how to' is an important component of any successful recycling program
- Using existing waste and recycling methods (e.g. transfer stations and kerbside) are cost effective, convenient, effective and simple

ASSESSMENT OF THE CRIS

Key Outcomes Sought by AMTA

The key outcomes sought by AMTA include

- Commonwealth not State Based Regulation
- Broad Protection from Free Riders
- Industry not Government Managed & Funded Schemes
- Industry Specific not Single/Combined PROs
- Industry Developed and Government Endorsed Targets
- Recycling Free to Consumers at point of disposal
- National Systematic, and Regular Collection of e-Waste

Commonwealth not State Based Regulation

- Regulation at the Commonwealth rather than State level is preferable as it avoids the potential for differential regulation by States and related complexities and costs.

Broad Protection from Free Riders

- Maximum industry participation is critical to establishing national e-waste product stewardship schemes. Regulation to prevent Free Riders will ensure Industry managed schemes are sustainable and will deliver optimal environment outcomes.

Industry not Government Managed & Funded Schemes

- Product stewardship schemes are best managed by the respective Industry groups, as this will ensure greater ownership and commitment, better integration into operations, innovative product design and more effective recycling services. Industry managed schemes will also be more responsive to new products, technologies and consumer behaviour.

Industry Specific not Single/Combined PROs

- Product stewardship schemes need to be tailored to the respective industries, given the differences in material types, recycling costs and processes. Industry specific schemes are also best placed to manage their own funding requirements and processes. In the longer term there may be a logical merging of the schemes however this process is best driven by the market as the industries evolve and converge.

Industry Developed and Government Endorsed Targets

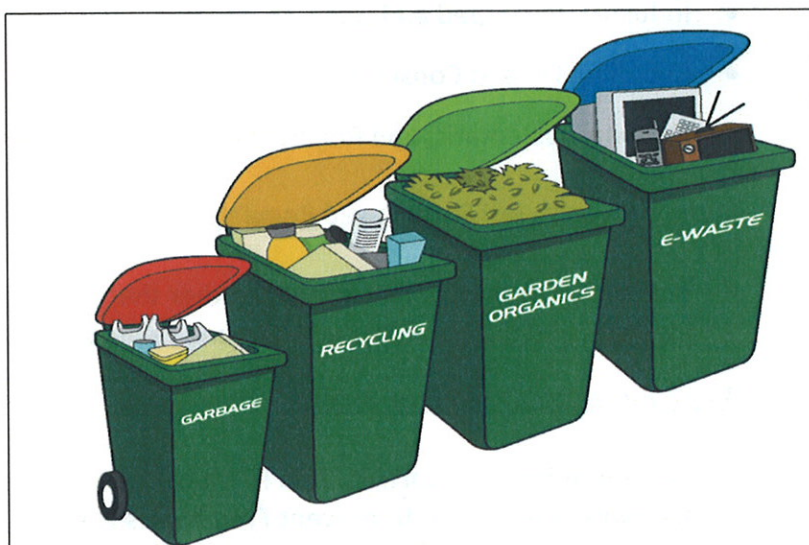
- Product stewardship schemes should develop their own targets for recycling collections and recovery rates, and these targets should be reviewed and endorsed by Government. Capacity to review and revise targets annually is essential given the rapid development of new technology, products and materials

Recycling Free to Consumers at point of disposal

- Our experience indicates that to maximise consumer participation it is essential that recycling remains free to consumers at the point of disposal. The costs of recycling must therefore be built into the product pricing at purchase, or otherwise absorbed by the industry group

National, Systematic and Regular Collection of e-Waste

- Regardless of the structure of a Product Stewardship or other Scheme, in order to maximise collections of the product – the recycling method must be easy and accessible for consumers.
- AMTA recommends the Government give strong consideration to the development of a national systematic, regular collection of e-waste that is easy for consumers to access.



- Our recommendation is for the creation of a 'National e-Waste Kerbside' program that uses existing waste collection infrastructure and processes leading to a range of desirable outcomes including increased innovation in recycling processes, lower costs and improved environmental outcomes.

Conclusion & Recommendation

AMTA's preferred model option from the CRIS is **Option 8 – Mandatory Import Licence Requirement.**

This option will maximize industry participation and environmental outcomes while minimising government regulation and intervention providing a sound foundation for an effective national e-waste product stewardship scheme.

AMTA also recommends that the applicability of these options be considered for other e-waste streams including mobile phones.

AMTA would welcome the opportunity to work with Commonwealth and State Governments and the TV and Computer Industries to establish a sustainable national e-waste product stewardship scheme for future generations.

AMTA would also welcome the opportunity to meet with Commonwealth representatives to discuss this submission further. Should you require any further information or have any questions please contact Rose Read, Recycling Manager, rose.read@amta.org.au or 02 8920 3555.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Mason', with a stylized flourish above the name.

Chris Mason
Chairman, Recycling Committee

