



AMTA submission in response to the

Exposure Draft of the Product Stewardship (Television and Computer) Regulations

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SUMMARY

The Australian Mobile Telecommunications Association (AMTA) generally supports the Exposure Draft Regulation and considers that it has many of the key elements required for a well managed and industry-led product stewardship scheme for the recycling of televisions (TVs) and computers.

Within the context of the Product Stewardship Act, the draft regulation provides the right incentives for manufacturers, brands, importers and suppliers to design, fund and implement a national collection, recycling and community education program for end-of-life TVs and computers.

However, in light of the rapid evolution and convergence of electronic products and the dynamic nature of the electronics market the regulation needs to include a mechanism that ensures the regular review of the list of products (as defined by the tariff codes) within each class of products. The review should be at least every 12 months and should also consider aftermarket TV and Computer consumables (i.e. batteries and printer cartridges).

Since the inception of MobileMuster in 1999, we have received hundreds of questions from concerned Australians about how, and where, they can recycle TVs, computers, cameras, home phones, mp3 players, DVD players, VCRs as well as batteries, home electrical appliances, electronic toys and tools.

The proposed regulation only addresses TV's and computers. While this will help meet growing community demand, significantly increase the volume of e-waste recycled and reduce e-waste disposal to landfill, there is still a real need for government to work with industry in ensuring electronic products other than mobile phones, TVs and computers are also covered by voluntary or co-regulatory schemes.

There are a many environmental, economic and social benefits that could be realised by the community, local government and industry in encouraging product stewardship schemes for other electronic and electrical equipment (including batteries) not presently covered by existing schemes like MobileMuster and Cartridges4Planet Ark.

To ensure these schemes are effective MobileMuster supports the creation of an integrated e-waste collection service for the community that is free, accessible and has wider product coverage than mobile phones, TVs and computers.

As a first step in realising the benefits of adopting an integrated and coordinated approach to e-waste collection, MobileMuster will work closely with the TV and computer schemes to streamline collections and raise community awareness and participation.

Specific comments in response to individual clauses within the exposure draft regulation are provided below.

AMTA's Response to Specific Clauses within the Exposure Draft Regulation

Application (1.04)

No capacity to review the tariff codes specified within each class of products. Given the rapid evolution and convergence of electronic products (e.g. tablets, wireless devices in computers) there needs to be some mechanism to enable the regular review of the tariff codes within a class of products, at least annually and to include after market consumables.

Outcomes (3.1)

From MobileMuster's experience, arrangements should be able to achieve national coverage within the required timeframe. MobileMuster currently has more than 4,500 public drop off locations nationwide, a free post service, as well as more than 3,000 businesses, schools, government agencies collecting and recycling mobiles for their staff, students and clients.

MobileMuster currently reports annually on collection/recycling and material recovery rates – with the former audited independently. The decision to have the material recovery target in place by 1 July 2014 is consistent with MobileMuster's plans to have its material recovery rates independently auditable within the next 12 months.

Collection Services (3.2)

MobileMuster considers that a diversity of collection options is critical to the success of any recycling scheme as illustrated above. MobileMuster introduced a post back service in January 2008 for recycling mobiles. Collections from this channel now make up over 25%. Posting products back for recycling is certainly a viable and user-friendly option as it enables wide-spread accessibility to the population regardless of their specific geographic location. However, from MobileMuster's experience, it is a much more expensive method to collect products, around four times, so needs to be applied where appropriate taking into consideration product size and the substances within the product.

Access (3.3)

The AMTA agrees with the proposed access requirements.

Recycling (3.04 & 3.05)

The AMTA supports the method to calculate the recycling targets and how recycling targets can be met.

Material Recovery from Recycling (3.06)

The AMTA supports this target.

Matters to be dealt with by co-regulatory arrangements (4)

The AMTA supports the list of matters that must be dealt with by co-regulatory arrangements.

Record keeping, information giving and reporting (5)

The AMTA considers the requirements for record keeping, information giving and reporting are appropriate and are consistent with internal reporting arrangements for MobileMuster to determine targets.

The AMTA does question the need or value to provide reporting down to a state and territory level, given the national focus of the regulation.

Audit report (5.3.2)

It is noted that an audit report of the financial statements is required setting out the revenue and expenditure of the co-regulatory arrangement. This does not seem to be consistent with the matters to be included in annual report (5.13).

The AMTA questions the need for a financial statement in the annual report.

About AMTA

The Australian Mobile Telecommunications Association (AMTA) is the peak industry body representing Australia's mobile telecommunications industry. AMTA members include mobile Carriage Service Providers (CSPs), handset manufacturers, retail outlets, network equipment suppliers and other suppliers to the industry. *AMTA's vision is to promote an environmentally, socially and economically responsible, successful and sustainable mobile telecommunications industry in Australia.*

AMTA members represent an innovative industry with annual revenue of more than \$12 billion, more than 20,000 employees and a direct economic impact of \$5.8 billion a year. The mobile telecommunications industry has an even bigger indirect or spill-over effect on the broader economy of \$6.4 billion because mobile telecommunications products and services make firms more productive.

MobileMuster is the mobile phone industry's official recycling program and is managed by AMTA on behalf of its members. This recycling program has been in operation since 1999 and was relaunched under the MobileMuster brand in 2005.

AMTA supports the principles of sustainability and product stewardship and its members are committed to continually reducing the environmental impact of telecommunications products throughout their life cycle from design, manufacture, handling to use and disposal by:

- improving the efficiency of resource use in products
- increasing resource recovery
- minimising the generation of waste (including hazardous substances)
- improving the management of post-consumer waste and
- reducing the risks to human health from poor management of products.

As all handsets are manufactured overseas, AMTA encourages handset manufacturers locally to promote product stewardship throughout their overseas parent.

AMTA is committed to ensuring consumers are informed about what they can do to reduce the environmental burden of mobile phone products by:

- encouraging people to extend the useful life of their mobile phone by repairing it at any handset manufacturer certified service centre, and
- promoting its mobile phone recycling program MobileMuster

Although AMTA is focused on promoting the recycling of mobile phones through its member funded program, MobileMuster, AMTA also recognises that refurbishment and reselling of used mobile phones is a legitimate global commercial activity that can extend the useful life of mobile phones, improving access to communications and providing social and economic benefits.

AMTA considers that refurbishment and reselling is only appropriate when it is conducted in a manner consistent with the *UNEP Basel Convention Guideline on the Refurbishment of Used Mobile Phones*. That is the repair and reconditioning of used mobile phones is done in an environmentally sound manner that will protect human health and where the mobile phones re-entering the market comply with applicable original equipment manufacturer technical performance standards and regulatory requirements.