

The National Television and Computer Scheme – Operational Review

ANZRP's response

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1. Submission

ANZRP appreciates the opportunity to respond to the Operational Review of the NTCRS.

The review has facilitated healthy discussion on the performance of the Scheme, including factors influencing outcomes and underlying assumptions.

It has also already created positive outcomes, with many local governments being increasingly open to working collaboratively with Co-regulatory Arrangements (CAs). There is a growing understanding of the needs and issues between all stakeholders.

The debate around the standard and workplace health and safety has:

- confirmed the critical role State and Federal regulators play in regulating and overseeing safe work places and sound environmental outcomes.
- highlighted the issues relating to responsible recycling such as the management of downstream vendors, appropriate processing for commodities and the challenges around available markets.

ANZRP appreciates the responsive approach the Government has already taken to issues raised and its willingness to resolve those issues. We fully support the review of the Scheme and are a willing participant in any ongoing consultation to resolve matters raised to achieve satisfactory outcomes for all stakeholders. ANZRP looks forward to participating in the full Scheme review in 2016.

About ANZRP

Australia and New Zealand Recycling Platform Limited (ANZRP) is the pre-eminent approved Co-regulatory Arrangement (CA) operating under the National Television and Computer Recycling Scheme (NTCRS), and fully funded by leading consumer electronics companies with iconic global brands.

We were established with the strong support of the AIIA ESIG members, and adopted the model of European Recycling Platform (ERP), a widely successful not for profit industry scheme. Our vision, from the outset, has been to create a community which collects, processes and recycles electronic waste (e-waste) for responsible environmental outcomes.

ANZRP has been well known to Government since its early work with the AIIA Environmental Special Interest Group, representing major IT brands; and with PSA, representing major TV brands. These groups worked with Government to play an integral role in the development of Product Stewardship and the NTCRS in Australia, including the establishment of the Interim Industry Standard (IIS) for the collection, transportation, storage and recycling of e-waste – a foundation document for safe environmental outcomes, supported by training for participating recyclers.

With a working group made up of Canon, Apple and HP, and an Interim Board from Canon, Toshiba, Lenovo and Panasonic, ANZRP set course in 2011 to deliver on the industry model and set the best practice benchmark. Some four years later our



company, still run by a Board of industry representatives, continues to deliver the outcomes of the NTCRS in an environmentally sustainable manner, decisively consolidating our credentials as the leading CA. Our TechCollect program is now a firmly established and highly regarded player in the Australian e-waste recycling business.

ANZRP's combination of industry expertise, not-for-profit status, governance structure, and policies and procedures ensures that it deals with regulatory matters in the most appropriate manner, carefully managing risks and compliance and meeting all statutory obligations. Our recyclers must meet the highest environmental and WHS standards, and are independently audited to ensure compliance.

ANZRP maintains accurate records of the administration and operation of its activities, keeping the Regulator informed and providing annually audited, detailed reports on the operation of the CA during each financial year.

In line with its goals for a long-term and sustainable Scheme, ANZRP has partnered with the same recyclers and many of the same collection partners from its beginnings to manage the process of collection, logistics and recycling. We also have extensive knowledge and experience through our members of individual producer responsibility programs and initiatives such as Byteback, dating from 2006.

Membership of ANZRP is open to all liable parties including computer, printer and television manufacturers, brands and importers. ANZRP currently has almost 50 liable parties in its membership.



2. The Product Stewardship Act and the NTCRS

Background

The Product Stewardship Act and the resulting NTCRS came about through industry lobbying of government to implement a sustainable scheme that created a level playing field for all parties. The Scheme has enjoyed strong and sound support from liable parties. Prior to implementation there was consultation of all stakeholders and the current structure of the Act and the NTCRS regulations reflects that consultation.

It is clearly acknowledged in the review report that the Scheme has met/exceeded its required outcomes and liable parties have met their obligation in joining and funding e-waste recycling through CAs. The NTCRS performance against outcomes is strong:

- 110% of volume
- 1,171 Reasonable Access services
- 99.8% liable party compliance
- only 25 reported environment/WHS incidences

The three years of scheme operation have raised some concerns amongst the various stakeholders:

- stockpiling of CRT glass has been occurring, which increases environmental risk
- some local governments were not able to leverage the benefits of the Scheme
- some recyclers and social enterprises have been challenged in relation to the contracting and procurement practices of some CAs
- early industry warnings relating to potential operational issues of implementing the NTCRS without a standard or Material Recovery Target (MRT) have come to fruition. The Industry concern was so strong that it developed an Interim Industry Standard for this purpose and encouraged government to adopt that interim standard until an Australia New Zealand standard could be developed. However without this being mandated, many of the anticipated operational issues have occurred
- mechanisms for the maintenance of current product data and tariff codes and the actual level of waste arising have not been put in place to ensure equity for liable parties

We suggest that any reforms to the Scheme focus on these operational issues rather than increasing the recycling target at the expense of liable parties. ANZRP believes that focusing on an increase of targets would negatively impact the current support the Scheme currently has with industry and will jeopardise the potential for product stewardship schemes for other products in future.



Objects of the Product Stewardship Act

“Product Stewardship Act 2011. The Act came into effect on 8 August 2011 and provides the framework to effectively manage the environmental, health and safety impacts of products, including those impacts associated with the disposal of products.”

It is important to keep the objects in mind together with the required outcomes of the NTCRS so that focus is not lost on ancillary matters in and around the Scheme. The Scheme was not developed to create jobs or to regulate the recycling industry albeit these may be positive outcomes over time.

Why this review, why now?

This review largely arose following concerns with stockpiles of CRT glass and issues raised by local government, some recyclers and social enterprises regarding the contracting and procurement practices of some CAs.

The approval of five CAs to compete for the liability of ~130 liable parties created a divide around cost and a debate about standards. Responsible recycling in Australia is costly due to a number of factors including the high cost of labour, the low volume of e-waste recycling undertaken, the maturity of the market (low investment in infrastructure) and the availability of appropriate downstream processing of products for final disposition. E-waste recycling recovers resources that are sold on a global commodity market and are part of a global economy.

Understanding why recovery of resources is important for our finite resources and the environment, and why standards and workplace health and safety are critical to the safety of people who process these products, has led to some misunderstanding that price alone is the appropriate determinant for recycling. The potential outcome of price-based recycling, particularly when price is set by the buyer rather than the seller of the service, is that corners are cut to deliver on the price offered. In the case of the NTCRS it was manifested in contracts priced below cost, so that recycling was not completed (glass mountains); and/or businesses could not cover their operating costs and either renegotiated/diversified or failed. This is an untenable practice. From an outcome perspective it would be good to know if the product i.e. the glass mountains was reported as recycled under NTCRS despite having to be cleaned up by EPA NSW.

ANZRP believes that over-collection of volume was based on unknown capacity and an intention to secure volume for sale to other CAs which did not eventuate. NTCRS funding is finite to the Kg, and when a CA's member liability is met the funding is effectively exhausted; unless there is a strategy to manage both volume and cost, contracts will need to be reduced/managed to volume. To date this has not been well managed by some CAs. ANZRP has evolved a strategy that ensures its collection and recycling runs throughout the year, this provides consistency for collection partners, logistics providers, recyclers and liable parties. Given the requirements to meet Reasonable Access and the number of collections it is impossible for any CA to exactly meet the liability of the member base without a level of over-collection.

If cost(profit) is allowed to be the core driver then NTCRS outcomes, the community and the environment will suffer as cost based recycling it is not sustainable or in anyone's best interest. Worse still, it fails to provide appropriate support to allow the industry to consolidate and invest, thereby creating the opportunity to improve and deliver to best practice.



The brunt of these issues is likely to be passed on to liable parties through this review proposing to implement an increased recycling target to be funded by liable parties; businesses have suffered, in several cases terminally.

The largely price-based approach of some CAs and the liable parties who they represent will continue to drive a race to the bottom, at least until standards and MRT are implemented and enforced. At that point we should start to see a level playing field and real competition which will drive innovation, investment and efficiencies, thereby reducing costs (as has been seen in overseas markets). This is required for product stewardship to flourish in Australia and for Australia to meet international benchmarks.

Inherent risks in a new scheme

There are many uncertainties in the NTCRS, and these uncertainties affect a CA's ability to plan and conduct its business and consequently affect the suppliers of CAs:

- Data upon which the Scheme is based and liability is calculated must be tested for validity
- Implementation coinciding with the analogue to digital switch created a "blip" that could not be calculated
- No endorsed standard or MRT requirement allowed poor processing which damaged the recycling industry's reputation
- Low community awareness of the Scheme
- Forecast waste arising is based on modelling and assumptions around consumer behaviour and economic activity; it is difficult to forecast in rapidly changing areas such as technology where we are rapidly moving to services and the virtual world over hardware. Products change rapidly and the Scheme needs to keep pace to maintain equity
- Liability is based on imports which vary by liable party (importer/manufacturer) annually
- Liable parties move CAs, changing the ability to contract
- Timing issues with advice of liability: CAs can be in the dark on the volume they have to recycle well into the 2nd quarter of the financial year, making business planning and contracting difficult. Once-contracted liable parties may move arrangements, changing the recycling volume for the CA
- Consumer willingness to drop product for recycling is unmeasured and uncertain
- Local government's conundrum of gate fee or funded recycling and how to contract for a free service
- News of the scheme drove an increase in new recycling businesses, many investing without secure contracts or certainty about end markets for resulting commodities, let alone an understanding of the recycling industry and its inherent risks
- Commodity markets and downstream solutions continue to be a challenge
- When does waste arise?
- Regulatory enforcement or lack thereof
- CAs' core business growth being the reason for applying to be a CA
- The requirements for Reasonable Access being enforced: i.e. is it seriously viable to offer a post back service and meet Reasonable Access?
- State and Territory Governments can act in concert with or against the Scheme with policy settings
- There are limited controls that can be applied to the waste dropped by consumers



which may vary dramatically month on month, region by region and with little rhyme or reason as to the product mix between TVs and computers, which have different recycling costs

It is all about risk management and strategy to overcome or contain the risks. CAs are challenged in providing any certainty to sub-contractors and may need to flex and change as they react to market conditions/changes affecting their businesses. Despite the consultation pre-Scheme and best endeavours since, we have not created a level playing field.

3. Review's findings and recommendations

The review makes three findings and ten recommendations and seeks comments from stakeholders on those findings and recommendations. ANZRP's response to each of these is detailed below:

Finding A - Addressing the shortfall in funded recycling

There are three sources of funded recycling, the NTCRS; State and Territory Governments through local government; and business, not just the NTCRS. ANZRP believe that there is not a shortfall in funded recycling but unwillingness by local government and some business to fund recycling outside of the NTCRS, since its implementation.

NTCRS – funded by liable parties – undertook to fund an increasing percentage of the waste arising in a shared responsibility with State and Territory Governments as committed to by COAG. There was an assumption that LGAs were managing (presumed recycling as opposed to landfilling) e-waste prior to the Scheme and that this management should continue. Waste has become a resource for LGAs where many wastes can be sold or turned into some form of saleable product or derives revenue from gate fees/rates to cover the cost of treatment/processing; LGAs are seeking to best manage e-waste in a similar manner.

As not all CAs work with LGAs there will not be a CA contract for every LGA or even every regional operating group of councils. This is an opportunity for local government to work with CAs to derive the greatest benefit for the communities from the Scheme.

In the case of Business/Government, while much of this product is managed by finance/leasing or asset management companies, a number of large businesses have contracts with remarketers or recyclers where they pay for a data cleanse and refurbishment program and are compensated part of the costs recovered from the remarketing. ANZRP has concerns that some of this product may be being double counted by being directed to the reuse market but also reported as recycled. Presumably the business concerned not being aware they are supporting the NTCRS which could be a positive for that business and its sustainability. Certainly product that cannot be reused would be recycled and should be reported as recycled either inside or outside the NTCRS.

We suggest that a key priority for the Scheme is to confirm the level of recycling that occurs outside the NTCRS as we believe that the State and Territory Governments, though local government should increase their efforts in providing funded recycling services outside the scheme. We also suggest that business are recycling product, which may or may not be recognised through the Scheme.

We strongly support a shared approach to e-waste recycling in Australia. The NTCRS is only one of several mechanisms to manage e-waste. Industry, governments and consumers all have responsibility to support e-waste management. The key options canvassed in this paper



place additional regulatory and cost burden on the liable parties, despite the fact that to date liable parties through CAs have more than met their obligations as agreed when the scheme was implemented.

Findings B & C - Underpinning sustainable recycling capacity

It is important that e-waste recyclers continue to monitor industry trends and undertake due diligence in relation to all investment and business decisions. Current trends indicate increasing consolidation of the e-waste recycling industry, which is likely to continue over time.

ANZRP fully supports this finding and is concerned by the low of barriers to entry and due diligence undertaken by new entrants in the recent past.

State and territory governments may have options for supporting social and disability e-waste recyclers to remain viable or to support their transition into other business areas, and ensure that these businesses are informed about applicable assistance programmes.

Recommendation 1 – Communication of scheme activities

It is clear that most CAs, particularly those measured by profit, do not participate in advertising or building an awareness around the Scheme or their specific program.

ANZRP's TechCollect program is the most publicly recognised of all CA programs. ANZRP has established education and awareness programs through its TechCollect program. This is done with support from collection partners, local radio and print media, the Internet and social media.

ANZRP sponsors Planet Ark's recyclingnearyou website (which is the source of NTCRS collection locations and a useful resource for all recycling information) and other sustainability initiatives; participates in industry forums and conferences; and undertakes research to improve the scheme. This makes ANZRP's TechCollect program the most prominent and actively promoted CA program. It is clear that most CAs, particularly those driven by a price imperative, are not building awareness around their program.

The Federal Government communication package should:

- communicate to stakeholders about why they should recycle. IPSOS research into consumer behavior (conducted by AIIA and supported by ANZRP) highlighted that a lack of understanding of the reasons for recycling resulted in the hoarding or incorrect disposal of products
- consider the role of local government as they have direct contact with their communities and are a significant provider of waste education. Working with local government to develop this communication would be advantageous for all
- develop an educational program for schools that can be deployed across Australia. Our work with schools and some of our partner program such as MobileMuster prove that children are the key to changing household behaviour

Further the AIIA IPSOS research (co-funded by ANZRP) into consumer behavior demonstrates a low level of awareness of the Scheme which is one of the issues around communication. Ensuring consumers understand the reason why we should recycle rather than hoard products are why we need a communication strategy that addresses this issue.



Recommendation 2 – Performance of the scheme

ANZRP supports a regulatory amendment to include the requirement to comply with AS5377.

With compliance, it is not what you say, but what you do that matters. ANZRP's approach to standards has been to engage the services of a specialist environmental certifier to independently assess ANZRP's recyclers. ANZRP is committed to this approach and has an ongoing audit program with its recyclers.

We believe there is also strong support by the recycling industry for the implementation of a standard. Recyclers are required to meet numerous standards (e.g. licencing requirements, workplace health and safety). Most recyclers are already certified to ISO14001 or AS NZS 4801 as it is a requirement of doing business and makes them more attractive to potential markets. Adding AS5377 certification should further improve their value propositions.

We also refer you to AIIA's response in relation to this matter.

ANZRP fully endorses the concerns with regard to certifying bodies being comprehensively trained and auditors being specialists in the area. Without confidence in the certification and auditing process, certification to AS/NZS 5377 provides no value and does not mitigate risks to the environment or community. When applying the standard we must ensure that all subcontractors that work for recyclers comply, rather than only the core recycler. There is greater environmental and community risk further away from the core recyclers which must be monitored.

Recommendation 3 – Addressing the shortfall in funded recycling

ANZRP does not support increasing the Scheme target.

See the response to finding A. Noting there are three sources of funded recycling, shared responsibility needs to be developed alongside a mechanism by which all recycling undertaken in Australia is measured and reported.

Increasing the Scheme target will not solve the issues raised in the operational review. Rather it may cause financial distress for some liable parties and will negatively impact the positive support that liable parties currently have for the Scheme.

ANZRP would like to see the evidence to support unmet demand given the scheme, without the over collection, has met its target. We suggest that unmet demand is due to the poor performance of other sources of funded recycling; not the NTCRS.

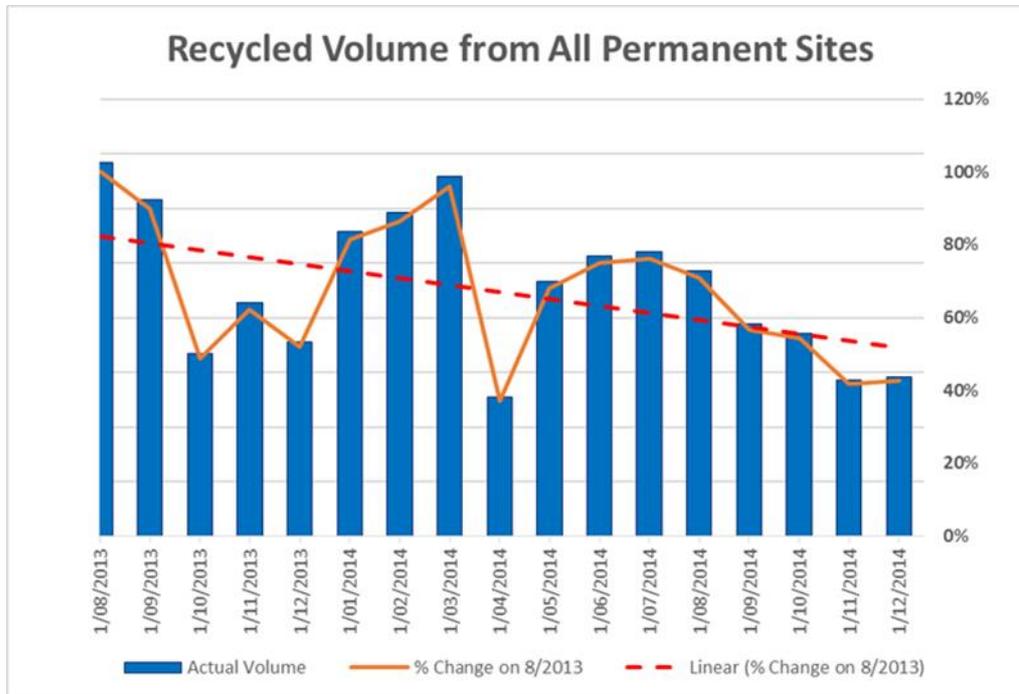
ANZRP's data does not support the review's suggestion that there is increasing recycling demand. ANZRP believes that once a data validation exercise has been undertaken that removes the impact of the TV analogue to digital switch, it will show that unmet demand is may be in pockets where the scheme/LGAs have not formed sound working relationships or the LGS are not offering a service. We also disagree that the over-collection by a single CA is a clear indication of unmet demand. This situation was a particular volume sourcing strategy of the CA; that volume is recycled and is an asset to that CA.

The government's own data shows that imports have been in decline. The recent cost implications connected to Customs Tariff codes i.e. they now set a converted weight which is the basis of liability has also seen liable parties paying greater attention to their accuracy which has resulted in significant adjustment to the level of waste arising.

The graph below sets out volume recycled from ANZRP's permanent sites Australia wide between August 2013 and December 2014. This shows a clear downward trend.



The downward trend indicates that any unmet demand prior to the scheme has been cleared as has the volume from the digital switch. The volume is now starting to settle to a normalised trend.



In addition ANZRP is aware that:

- not all recyclers wishing to participate in the Scheme have been awarded contracts and that there is a level of dissatisfaction by these recyclers. This is a market mechanism and not cause for increasing Scheme targets
- not all local governments have contracted with CAs to provide funded recycling. Again, this is not cause for increasing Scheme targets, but part of the shared responsibility of local government to manage e-waste recycling outside the NTCRS
- political pressures from social enterprises and their supporters, and from state and local governments, to increase the recycling targets for the NTCRS. Given the success of the NTCRS it seems an inappropriate strategy to penalise the very parties that are meeting all obligations and outcomes and funding the recycling of e-waste, thereby ensuring products are diverted from landfill. While this is an easy strategy it is not in keeping with the COAG agreement, or the agreement with liable parties who willingly fund an increasing share of Australia's e-waste

ANZRP does not support changes to the target trajectory and does not believe a sound basis has been established for the Department to undertake a regulatory impact analysis on this recommendation. To increase the target trajectory will create an increased regulatory burden on liable parties regardless of the long-term impact through NPV calculations. This industry is ever-changing and many players will not be in the market to reap any future benefit but will definitely be burdened by any increase in the short term.

ANZRP is supportive, where industry is supportive, of consideration of expanding the regulated products under the NTCRS and future product stewardship schemes as this will allow



economies of scale to be developed and will lead to investment by industry to deliver better recycling outcomes and reduced cost of recycling for all.

Recommendation 4 – Underpinning sustainable recycling capacity – notice of planned changes

ANZRP does not believe that we are able to provide additional information to the market in relation to e-waste planning. While there continues to be limited recycling outside of NTCRS, recycling will be roughly to the level of funded liability.

The Scheme will always experience a level of uncertainty in volume due to:

- dependency on the community to present e-waste for recycling
- changing member volumes through the level of imports
- varying volumes coming from collection partners across Australia
- the number and take up of events
- unforeseen opportunities for additional volume presented by businesses

ANZRP consciously selected what we believe are tier 1 sustainable recyclers that meet quality, environmental and safety standards and have the capacity to meet ANZRP's requirements. ANZRP has supported the same five recyclers since inception and did this on the basis that through ongoing support, those recyclers should prosper and then invest in order to provide better recycling and commercial outcomes. ANZRP has recently added a sixth recycler, Endeavour Foundation Redcliffe to its pool of recyclers making its recyclers PGM, Tes-Amm, Sims, E-cycle South Australia, and Total Green Recycling in WA and Endeavour Foundation.

Having a pool of recyclers ensures competition, allowing ANZRP to recycle locally which reduces costs and to meet its high-volume of recycling. By maintaining close relationships with our recyclers we can provide as much advance notice of volume changes as possible.

If recyclers meet the standards and are able to negotiate commercial terms with CAs they will have the opportunity to enter contracts which will provide a view on volume and ongoing commercial agreements.

Recyclers' businesses should ensure their operations are diversified in order to decrease their dependency on one provider or scheme. We want to ensure a vibrant recycling industry and to encourage innovation and competition as that is how it will become sustainable and reach international benchmarks.

Recommendation 5 – Underpinning sustainable recycling capacity – provide information to assist e-waste businesses in planning

See response to recommendation 4.

Recommendation 6 – Underpinning sustainable recycling capacity – establish a finite settlement date for target data

ANZRP fully supports this recommendation to be included in amendments to the regulations. We also acknowledge that it has been effectively implemented through advice to liable parties. A finite date for amendments to customs import data means CAs can get on with the business of collecting and recycling with greater certainty



Recommendation 7 – Underpinning sustainable recycling capacity – smooth recycling rates between financial years

ANZRP does not support the recommendation of a target-offset period as it creates a further degree of uncertainty for all parties.

The regulations already have provision to carry forward over-collection and account for it in future years, and a requirement to carry forward any under-collection has the same effect of the recommended amendment without creating any uncertainty.

Allowing CAs to manipulate volume between financial years is not in the best interest of liable parties who need clarity with regard to their financial liability at the beginning of each year.

Recommendation 8 – Underpinning sustainable recycling capacity – CAs to report on engagement of social and disability enterprises

ANZRP does not support this recommendation as it is outside the objectives of the NTCRS.

ANZRP is transparent in relation to the providers it contracts with this is important to the members that choose to work with us. We do not believe CAs should be measured on the extent to which they support social and disability enterprises.

ANZRP does see a role for social enterprises in the dismantling of e-waste. A number of ANZRP's recyclers employ people with disability and the long-term unemployed.

Recommendation 9 – Reducing the regulatory burden for liable parties – revise scheme's product codes and conversion factors

ANZRP strongly supports the ongoing work to match tariff codes and converted weights to products so there is equity for liable parties. We suggest that this needs to be done on a regular basis and the regulations should be amended to ensure there is an annual requirement to review tariff codes and converted weights.

ANZRP also supports:

- an amendment of TV tariff codes to be defined by weight rather than screen size and is supportive of a 5 kilo break range up to 50Kg then an over 50Kg and an over 75Kg category
- the elimination of production printers over 500kg as these devices do not enter the e-waste stream and when they do they are recycled/reused.

Recommendation 10 – Reducing the regulatory burden for liable parties – consider the waste arising scaling factor applicable to computer systems

ANZRP is strongly of the view that the scaling factor for computer products, computer peripherals and printers should be reduced to reflect the level of reuse of these products. Significant amounts of these products are shipped to offshore markets for reuse and not presented for recycling in Australia. Products imported into Australia are approximately 50% for the consumer market and 50% for the business market.

To confirm this view, ANZRP has commissioned research by Monash University to quantify the level of exports in order to set the revised scaling factor. The research supports the IT Industry's long held view that the scaling factor for computers should be .6 not .9. While a small level of reuse occurs for consumer markets a very high level of business computer products are exported for reuse.



Monash University research evidence supports that overall 40-50% of IT products are exported for reuse. The Monash research into the volume of exported IT products (which, therefore, is not entering the waste stream in Australia) has found that the transfer of businesses' used computers to international markets accounts for between 70-90% of products. Business-based disposal is typically managed in bulk and by using professional disposal services such as IT asset disposal firms.

This research supports exports of approximately 15% of consumer products and 80% of business products which translates to 40-50% of all computer products that land in Australia being exported for reuse. Further detailed analysis of this research will be provided to the Department separately in early March 2015.

4. Conclusions

ANZRP is very supportive of the operational review of the NTCRS and believes it has played an important role in bringing stakeholders together and opening conversation on issues between varying stakeholders. This can only be positive for the e-waste industry in Australia and subject to outcomes bodes well for future product stewardship programs.

We are into the third year of an extremely successful program and are starting to see some consolidation and settling in the market. The NTCRS has over achieved on all of its outcomes with solid support of liable parties. There is by far greater understanding of the issues and concerns of all stakeholders; however, ANZRP is firmly of the view that regulatory intervention in the market is not in the best interests of e-waste recycling and it should be left to market forces to allow the market to develop.

ANZRP cannot support the increase in targets as it would place undue burden on liable parties, who have driven this legislations and honoured their commitment. More importantly we do not believe that increasing targets will solve the issues raised in the review so it would unnecessarily increase the cost to liable parties without achieving the desired results.

ANZRP is firmly of the view that measures that ensure sound health and safety, environmental and community outcomes should be the focus of the review. We must recover the finite resources contained in these end of life products and keep them from landfill because it is the best outcome on every measure. Improving awareness of the value of recovering these resources and the positive environmental and economic outcomes it derives is key to an ongoing sustainable program. Standards, monitoring and reporting and consistent communication are the keys to be implemented.

ANZRP is strongly of the view that until the standard and Material Recovery Target is fully implemented there is a risk of not achieving the objectives of the NTCRS to create sound and scientific environmental outcomes.

It is time for liable parties to uphold the objectives and values of the NTCRS and stand together to demand a safe and environmentally sound outcome – this protects their brands and they will attract customer support from an increasingly



savvy consumer base who want to know who offers take-back programs and participates in recycling programs.

ANZRP is concerned that the level of resources in the Department to regulate the Scheme and resources applied by State and Territory regulators is maintained or enhanced. Operation to date have demonstrated there is a need for sound regulation and enforcement. There is also a need to boost the resources within Customs to investigate illegal shipping of e-waste. We would like to be assured that sufficient resources are maintained to perform these important roles.

ANZRP's role as the not for profit, industry for industry arrangement has never been more critical to the success of the Scheme. It has laid the foundations for a sustainable program that meets all criteria and is delivering in accordance with the guiding principles of its founding partners. Support for ANZRP is the only protection liable parties have of being offered long term viable compliance without the negative issues created by commercially-driven outcomes.

ANZRP looks forward to the next stage of the review and to achieving mutually beneficial outcomes that ensure the long term sustainability of product stewardship in Australia.