



Ai Group Limited
Level 5, 441 St Kilda Road
Melbourne VIC 3004 Australia
PO Box 7622
Melbourne VIC 3004 Australia
Telephone: 03 9867 0111
www.aigroup.com.au
ABN 81 632 926 099

Manager, Waste Policy
Department of Water and Environmental Regulation

RE: Waste Avoidance and Resource Recovery (e-waste) Regulations 2023 Consultation Draft

The Australian Industry Group (Ai Group®) is a peak national employer organisation representing traditional, innovative and emerging industry sectors. We have been acting on behalf of businesses across Australia for 150 years.

Ai Group and partner organisations represent the interests of more than 60,000 businesses employing more than one million staff. Our membership includes businesses of all sizes, from large international companies operating in Australia and iconic Australian brands to family-run SMEs. Our members operate across a wide cross-section of the Australian economy and are linked to the broader economy through national and international supply chains.

General Comments

While Ai Group supports the Western Australian Government's efforts to move to more circular outcomes for electronic and electrical products, we would recommend harmonisation with existing regulation on e-waste in other jurisdictions. Businesses have raised concerns that a lack of harmonisation will create costs and inefficiencies incommensurate to the benefit being achieved.

Ai Group would like clarification on whether significant businesses such as retailers would be classified as service providers when participating in product takeback as part of a product stewardship scheme or initiative, and consequently need to meet greater obligations. Ai Group would also like to have a greater understanding of how this definition would be impacted by the development currently under way of a national mandatory product stewardship scheme for e-waste.

Concerns have been raised over the timeline for businesses to implement collection, storage, and record-keeping under the regulation in line with AS5377. Compliance with the standard will require time to train staff sufficiently and establish record keeping procedures.



If you have any further questions regarding this submission, please contact our Advisor, Molly Knox (molly.knox@aigroup.com.au).

Sincerely yours,

A handwritten signature in black ink that reads "Louise McGrath".

Louise McGrath
Head - Industry Development and Policy
Australian Industry Group