July 2014

**Submission by the New Zealand Telecommunications Forum Incorporated on the Ministry for the Environment Priority waste streams for product stewardship intervention discussion document.**

**Introduction**

1.  This submission is made by the New Zealand Telecommunications Forum Incorporated (**TCF**). TCF members provide more than 90% of the internet and voice connections in New Zealand.

2.  Our Members include:  2degrees, AWACS, CallPlus, Chorus, Compass Communications, Enable Networks, FX Networks, Huawei, Kordia, Northpower Fibre, NOW, Orcon, Snap, Telecom, Trustpower, Ultrafast Fibre, Unison Fibre, Vector Communications, Vodafone and Woosh.

3.  Established in 2002, the TCF is a registered incorporated society.  The TCF's objective is to actively foster cooperation among the telecommunications industry's participants, to enable the efficient provision of regulated and non-regulated telecommunications services.  Our goal is to promote competition for the long-term benefit of end-users of telecommunications services in New Zealand.

4.  The TCF supports the purpose of the Waste Minimisation Act 2008 to "*encourage waste minimisation and a decrease in waste disposal in order to protect the environment from harm and provide environmental, social, economic and cultural benefits*. "

**Consultation Theme 1: Product stewardship priorities**

5.  (Q 1a) Waste Stream Criteria.  *We agree with all proposed criteria*.

6.  (Q 1b) Assessment of waste streams against these criteria. *We disagree with the assessments relating to electrical and electronic waste.*

7.  Two of the criteria for assessing whether a Waste Stream should be considered for compulsory product stewardship are whether existing schemes have been established

and failed; and whether key stakeholders in the scheme are requesting intervention. Our understanding is that refrigerants, agri-chemicals and tyres have all been the subject of requests by industry participants for direct regulation.

8. These criteria are not met for all electrical and electronic equipment as defined in the consultation.

9. Neither the mobile industry nor indeed the broader telecommunications industry has sought that the Government intervene directly. In fact, the TCF has recently achieved accreditation of a voluntary, mobile phone recycling scheme (RE:MOBILE) under the Waste Minimisation Act 2008 which covers all of the products listed in point 10 below. The scheme was originally established in 2009 and has been operating successfully since that date. Prior to that our members ran their own recycling schemes which had been in place since the early 2000s. It has been successful for its duration and with the recent accreditation we look forward to greater success.

10. The RE:MOBILE scheme provides an avenue for all New Zealanders to pass on unwanted mobile phones and mobile phone accessories for reuse or recycling. It facilitates reuse of unwanted handsets that are still operational by selling them for refurbishment and resale overseas, thus reducing the demand for new handsets and associated environmental impacts of their manufacture. Where the mobile phones and accessories cannot be reused, they are broken down and component materials are recovered. By providing this form of environmentally responsible recycling, we divert the phones and accessories away from landfill and recover reusable materials that can be used to create other products. This scheme provides an avenue for all New Zealanders to pass on unwanted mobile phones and mobile phone accessories for reuse or recycling.

11. (Q 1c) Product Groups identified for the Government to consider regulatory intervention - Electrical and electronic equipment. *We do not agree with regulatory intervention of electrical and electronic equipment at this stage.*

12. We understand that the Ministry for Environment is investigating a model for dealing with wider electronic waste which should inform the decision making about whether any electrical or electronic products should be made priority products. We think this is a critical first step as there are a vast number of products and categories covered by the definition, and for each there is a complex multi party supply chain to deal with the products at end of life. As such there are a very significant number of affected stakeholders who need to be engaged.

**Consultation Theme 2: Priority product declaration**

13. (Q 2a) *We do not agree* with the Minister for the Environment declaring the *electrical and electronic waste* as a priority product under the Waste Minimisation Act.

14. (Q 2b) We believe that the Ministry for Environment E-Waste Project that is currently underway in parallel to the Priority Waste Consultation should be completed first, before further consideration is given to electrical and electronic equipment being declared a priority product.

***For information on any aspect of this submission, please contact:***

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