# Questions on the Proposal to regulate e-products

Your answers to the following questions will help us develop a fit-for-purpose regulatory product stewardship scheme.

There are 44 questions. You can use this document to submit an organisation-wide response with input from multiple people. When you have completed this document register your details at the [Have Your Say consultation page](https://aus01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fconsult.dcceew.gov.au%2Fregulation-small-electrical-products-solar-pv&data=05%7C01%7CRoger.Morrison%40dcceew.gov.au%7C537b3c9776c04b8c118208db6bc1f266%7C2be67eb7400c4b3fa5a11258c0da0696%7C0%7C0%7C638222252961153310%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=PzVISxVf7vqIj3PJ1K8r%2Bht6wfgdo6nAWsYz5xndLtY%3D&reserved=0) and upload your submission by Sunday 23 July 2023.

## Introduction

1. I am a(n): [Check up to 3 boxes below]

Consumer

Manufacturer or distributor

Retailer

Recycling scheme

Installer

Recycler

Industry body

Academic

Commercial power generator

Other [Explain in the text box below]

1. How concerned are you about solar PV system waste? [Check 1 box below]

Very concerned

Concerned

Neutral

Unconcerned

Very unconcerned

1. How concerned are you about waste from electrical and electronic equipment?   
   [Check 1 box below]

Very Concerned

Concerned

Neutral

Unconcerned

Very unconcerned

1. Do you think government intervention (such as regulation) is needed for Australia to better manage small electrical products waste?   
   [Select **Yes**, **No** or **Maybe** from the **Choose an item** drop down below]

Choose an item.

[Type a response in the text box below if you answered **Yes** or **Maybe** at question 4]

1. Do you think government intervention (such as regulation) is needed for Australia to better manage solar photovoltaic system waste?   
   [Select **Yes**, **No** or **Maybe** from the **Choose an item** drop down below]

Choose an item.

[Type a response in the text box below if you answered **Yes** or **Maybe** at question 5]

1. Do you think there is sufficient information available to consumers on how their choices can reduce e-waste and how to safely manage e-waste?   
   [Select **Yes**, **No** or **Maybe** from the **Choose an item** drop down below]

Choose an item.

[Answer question 7 below if you selected **No** at question 6]

1. What additional information do you think should be made available to consumers?   
   [Check any or all the boxes below]

Information on the difference my purchase and disposal choice can have on human health and the environment.

Accessible information on how I can easily dispose of my unwanted e-waste.

Easily understood information on the impacts if my e-waste goes to landfill.

Information on the rules relevant to me in my state/territory and what I should do to comply with these rules.

Other. Type a response in the text box below to explain.

1. Select one or more of the following objectives you think the scheme should focus on.   
   [Check any or all the boxes below]

Reduce waste to landfill.

Increase the recovery of reusable materials.

Provide convenient access to e-stewardship services across Australia.

Support Australia’s transition to a more circular economy.

Foster shared responsibility across the lifecycle of covered products.

1. What objectives should be included or excluded? Type your response in the text box below.

Scheme administration

1. Explain any concerns about the scheme model proposed in the discussion paper?   
   Type your response in the text box below.
2. What do you think are the key benefits from the scheme model proposed in the discussion paper? Type your response in the text box below.
3. Is there a different scheme model you believe would be more effective?

[Select **Yes** or **No** from the **Choose an item** drop down below]  
Choose an item.

If you answered **Yes** at question 12, type your response in the text box below to describe the model and its benefits.

## Liable parties’ responsibilities

1. Do you agree that only first importers and producers should be liable parties?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.  
[Answer question 14 below if you answered **No** at question 13]  
[Answer question 15 below if you answered **Yes** at question 13]

1. What other participants in the supply chain should be considered liable parties, and why?   
   Type your response in the text box below.
2. The Scheme administrator is responsible for setting fees paid in advance by liable parties. If any, describe what role government should have in setting fees?   
   Type your response in the text box below.
3. How could eco-modulated fees be incorporated into the proposed scheme?   
   Type your response in the text box below.
4. Financial reserves will accumulate from the fees collected from liable parties for solar photovoltaic (PV) systems because there may be decades between when the products are placed on market and when they become waste. If any, describe what role government should take in managing these funds.   
   Type your response in the text box below.

## Scope

1. Are there any small electrical and electronic equipment products you believe should not be covered under the scheme?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

[Answer question 19 below if you answered **Yes** at question 18]

1. Which products and why? Type your response in the text box below.
2. Are there small electrical and electronic equipment products that you would like to see added to the list of included products in the discussion paper?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

[Answer question 21 below if you answered **Yes** at question 20]

1. Which products and why? Type your response in the text box below.
2. Can you suggest a better method than Harmonised System (Import) codes for defining in-scope products? Type your response in the text box below.
3. Should the scheme cover all parts of a solar PV system?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

Please explain. Type your response in the text box below.

1. Are there any products, or specific solar PV products, that should not be covered?

Type your response in the text box below to explain which products and why?

1. What do you think are the pros and cons of including, within the scheme, large format energy storage batteries which are attached to solar PV systems?   
   Type your response in the text box below.
2. It is proposed the scheme will cover batteries that are embedded in small electrical and electronic equipment but not loose batteries (e.g. AAA batteries). Do you have any concerns regarding the scheme approach to waste containing embedded batteries?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.  
[Type your response in the text box below if you answered **Yes** at question 26.]

## Targets and obligations

1. Do you believe that the set of targets and obligations detailed in the discussion paper are appropriate for a product stewardship scheme which covers small electrical and electronic equipment?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

[Answer question 28 below if you answered **No** to question 27]

1. What changes would you suggest to the proposed targets and obligations?   
   [Type your response in the text box below.]
2. Do you think the set of targets and obligations detailed in the discussion paper are appropriate for a product stewardship scheme which covers solar PV?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

[Answer question 30 below if you answered **No** at question 29]

1. What changes would you suggest to the proposed targets and obligations?   
   [Type your response in the text box below.]

Transitional arrangements for legacy waste from large‑scale PV systems

1. Do you agree it is appropriate that owners be responsible for covering the cost of managing all legacy waste from large-scale commercial solar PV systems (100kW and above?)

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

[Answer question 32 below if you answered **No** at question 31]

1. What alternative do you suggest? Type your response in the text box below.
2. Do you think it is appropriate to impose a mandatory requirement on owners of large-scale solar PV systems (over 100kW), built before the scheme commenced, to provide information about how they are managing waste?

[Select **Yes** or **No** from the **Choose an item** drop down below]

Choose an item.

[Answer question 34 below if you answered **Yes** at question 33]

1. What information should owners of large-scale solar PV systems, built before the scheme commenced, be required to provide to the Scheme Administrator?   
   [Check any or all boxes below]

Serial Numbers of deinstalled solar panels, inverters, and batteries.

Information on the organisation/s that are responsible for the decommissioning of these systems.

Information on the organisations that are recycling the waste from these systems.

Information on reuse or export of products.

Information on the disposal of these systems in landfill.

Other. Type your response in the text box below.

[Answer question 35 below if you answered **No** at question 33]

1. Explain why not. Type your response in the text box below.

## Scheme arrangements for solar PV

1. The paper suggests less than 100 kW capacity as the definition of small-scale solar PV systems eligible for free services (where they were installed prior to the scheme commencing).   
   What definition do you suggest from the list below? [Check 1 box below]

0-15 kW (predominantly households)

0-50kW (mostly households and small business)

Agree with the less than 100kW proposed (households and businesses)

1. How can the Scheme make collecting and transporting waste from PV systems convenient, efficient and cost-effective for electricians and PV system installers?   
   Type your response in the text box below.
2. What are the minimum requirements that should be set for a collection site to accept PV systems? Type your response in the text box below.
3. Should requirements differ between types of hosts? (For example, for those hosted by local government and those hosted by PV distributers). Type your response in the text box below.
4. How could the Scheme provide incentives for recyclers to recover more valuable material over time and ensure safe management of hazardous material from solar PV systems?   
   Type your response in the text box below.
5. The Scheme could allow liable parties, that have imported or produced solar PV systems and components, other options to manage their liability. This could apply when components are used in a large-scale solar project, such as solar farms. These options involve either the liable party or the owner of the large-scale project providing a decommissioning plan and bond, which would allow the financial liability to be met over a longer time frame.  
     
   Do you think this approach is appropriate?

[Select **Yes,** **No** or **Not sure** from the **Choose an item** drop down below]

Choose an item.  
[Answer question 42 below if you answered **Yes** or **Not Sure** at question 41]  
[Answer question 43 below if you answered **No** at question 41]

1. If the owner chooses other options to manage their liability the liable party could be exempt from paying upfront fees to the Scheme Administrator for some components. Which of the following requirements should apply for the Scheme Administrator to provide an exemption?   
   [Check any or all the boxes below]

The products or components where an exemption is being sought, must solely be used in a large‑scale solar PV system project, such as a solar farm.

A decommissioning plan that details how the system will be decommissioned, in-scope products will be recycled, and residual and hazardous waste will be managed must be provided to the Scheme Administrator.

A plan of how requirements of the scheme that would otherwise apply would be met. For example, obligations under the scheme.

A plan on how the commitments of the decommissioning plan will be transferred if the system is sold before decommissioning.

The owner provides an appropriate bond, surety or guarantee for the commitments made in the decommissioning plan.

☐ Other (please specify)

1. Explain why not. Type your response in the text box below.
2. Are there any other comments you would like to make in response to the paper?   
   Type your response in the text box below.

<END>