



Australian Mobile Telecommunications Association | MobileMuster

**Submission to the Senate Standing Committee on Environment and Communications
Legislation Inquiry into
Recycling and Waste Reduction Bills 2020**

14 September 2020

Introduction

The Australian Mobile Telecommunications Association ([AMTA](#)) is the peak industry body representing Australia's mobile telecommunications industry. Its mission is to promote an environmentally, socially, economically responsible, and sustainable mobile telecommunications industry in Australia. Its members include the mobile network service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

MobileMuster is a successful product stewardship program established in 1998 by AMTA. MobileMuster is voluntarily funded by its members which include Alcatel, Apple, Google, hmd Global, HTC, Huawei, Motorola, Oppo, Optus, Samsung, Telstra, TPG Telecom, Vigo Mobile Australia and ZTE.

AMTA welcomes the opportunity to provide comments to the Environment and Communications Legislation Committee's Inquiry into the Recycling and Waste Reduction Bills 2020 (the Bills).

Background on MobileMuster

MobileMuster is the product stewardship program of the mobile telecommunications industry in Australia. The program was established voluntarily in 1998 by handset manufacturers and the mobile network operators, under the auspices of AMTA, to provide an environmentally sound take back program to keep mobile phones and their accessories out of landfill.

Since the Product Stewardship Act 2011 Act came into effect, the legislation has provided the framework to effectively manage the environmental, health and safety impacts of products, and in particular those impacts associated with the disposal of products.

MobileMuster has continued to play a leadership role in product stewardship and mobile phone recycling in Australia as an accredited voluntary program under the Act. The mobile telecommunications industry is constantly working to reduce the environmental and human health impacts of their products, across their entire lifecycles. This includes improving material and energy efficiency, increasing recyclability and reducing the use of hazardous substances.

MobileMuster's Fundamental Objectives:

Environmental: keep mobiles and accessories out of landfill and optimise resource recovery in a safe, secure and ethical way.

Social: free recycling service for consumers; promote awareness and education.

Political: enabling members to meet their product stewardship requirements and obligations.

Economic: effective, efficient, equitable and sustainable program for its members.

Since the inception the scheme has collected and recycled almost 1,500 tonnes of mobile phone components, including over 320 tonnes of batteries. The program collects and recycles all brands of mobile phones as well as their batteries, chargers and accessories, plus wireless mobile technology modems. In 2017 the scheme started accepting smart watches.

The introduction and deployment of 5G, the next generation of mobile technology, will deliver significant growth in the number of connected devices. This will include wearables, household gadgets and industrial sensors which are mobile enabled. MobileMuster will continue to look for

opportunities and work with industry to take on a proactive approach to product stewardship responsibilities as new products enter the market. AMTA believes, that as a voluntary scheme, MobileMuster is well positioned to broaden the scope of products, introducing new industry members and further developing our collection channels and recycling industry.

Voluntary accreditation and the role of Government

MobileMuster holds voluntary accreditation under the current Act. The Government's accreditation of the program provides confidence and credibility to the community that MobileMuster manages a recycling service that is safe and secure, meeting the highest Australian (AS/NZS 5377) and international (R2) environmental standards. Accreditation also ensures broad industry engagement with the program as industry members are assured of the program's sustainability and accountability.

AMTA sees potential opportunity for the Government to be more active in promoting the value of accreditation, as well as providing increased support to schemes to encourage them to complete the accreditation process. Specifically, AMTA suggests that the Government should actively promote accredited schemes, such as MobileMuster, to the broader community and encourage federal government departments, local and State governments and their agencies, to support schemes within their supply chain. Such an approach would add increased value to accreditation and encourage other industry schemes or programs to be developed and to pursue accreditation.

Social and community benefits

The MobileMuster program also provides social benefits to the community. The recycling service is both free and accessible to all mobile phone users. Along with providing a free take back program, MobileMuster works to raise the awareness of mobile phone recycling through its communications and education activities, including a school's program across Australia. Everything collected by the program is recycled for resource recovery and any data left on devices is destroyed securely as part of the recycling process, ensuring customer privacy and confidence.

MobileMuster has taken a circular economy approach and encouraged consumers to repair, reuse and recycle their products safely and securely. To do this MobileMuster has developed resources and tools to help people get their devices ready for reuse or recycling. The reuse market for mobile phones is growing locally and should be reflected in formulas for calculating recycling collection rates. MobileMuster is committed to developing insights into the reuse market and how it is expected to expand over time and what the expected impact it will have on available volumes for collection and recycling.

MobileMuster's long term focus is to deliver on our key performance indicators (KPIs) as per the program's voluntary accreditation along with efficiently managing a financially sound program. The performance of MobileMuster is measured against a number KPIs that include changes in consumer awareness, collection and recycling rates, diversion from landfill and industry participation. Each of these indicators is assured independently by auditors, RSM Australia, ensuring transparency of the program's performance.

Figure 1. Key Performance Indicators FY18/19

	Target	Actual
Collections		
Mobile Phone Collections (weight – tonnes)	84	84.7
Annual Collection Rate (%)	56%	40%
Recycling		
Diversion from Landfill	97%	98%
Recycling Rate	>90%	98%
Consumer Behaviour		
Disposal to Landfill Rate	2%	3%
Awareness of Mobile Phone Recycling	>80%	70%
Industry Participation		
Manufacturers	>80%	94%
Mobile Network Carriers	>80%	84%

Amendments to regulate and encourage businesses that design, manufacture and distribute products to take greater responsibility for their environmental impacts.

AMTA is in support of the Government encouraging more industries, manufacturers and distributors to develop schemes to responsibly manage the environmental impact of their products. AMTA is also a strong advocate for a voluntary approach to product stewardship and recycling.

MobileMuster highlights how a voluntary scheme can produce positive outcomes without regulation. The mobile phone industry has successfully implemented an industry led program and invested over \$45 million to build up a solid collection network and maintain a strong brand and marketing awareness through consumer education and advertising. This is reflected by independent annual market research by IPSOS which shows high awareness and trust in the program with 70% of the community aware of mobile phone recycling and one third taking part.

AMTA supports the recommendation to consider options to broaden the focus of any scheme under the Bills. Although in terms of product design, we suggest it take careful consideration into what influence industry in Australia can have on products designed and manufactured overseas.

AMTA sees an opportunity for MobileMuster to broaden product classes that fall within the scheme’s accreditation. Consideration should be given to simplify the process and broaden product scope for existing schemes, avoiding the need to regulate. This would be more appropriate for product that may fall within the scope of the mobile telecommunications industry and peripheral products such as smart watches and virtual reality headsets.

We encourage the Government to consider the introduction of subclasses within existing schemes to include other products that align with what is already in scope for the scheme or in line with what the industry sells that would currently fall out of scope for the National Television and Computer Recycling Scheme. This would make it easier for existing schemes to broaden the scope of product which would be a positive outcome for industry and the Bills. It will also deliver improved streamlining of processes and deliver more effective outcomes for product stewardship in Australia.

AMTA notes that while the priority list as outlined is useful, the challenge remains as to how various products and industry sectors are defined specifically within electrical and electronic products. For example, industry participants may find they fall into more than one stewardship scheme due to the products they sell and the product scope being so broad. Convergence between technologies and

products can further make this confusing and result in unintended consequences in terms of regulatory obligations.

AMTA suggests that further consideration should be given to making the priority list fit for purpose and targeted. To help achieve this, AMTA recommends that further consultation with industry could assist in better defining sub-groups within the product scope. For example, potentially defining a telecommunications sub-group of products, to enable more products to be captured under an existing voluntary scheme, in this case, MobileMuster. This would also potentially make it clearer to who the relevant liable parties are for each scheme.

This will also create some assurance to industry stakeholders that product that is already under a voluntary scheme is not being considered for regulatory action. AMTA is also willing to play an active role and engage with other industries to share knowledge on how to establish a voluntary program, like MobileMuster. Ultimately any appetite to broaden the scope of MobileMuster will require the development of a full business case to ensure the integrity and longevity of the program.

Proposed ban to export of waste including glass, plastics, tyres and paper.

AMTA is in support of the export ban of the four material types. However, consideration and consultation with industry should be taken to ensure the right classification and definition is developed to ensure that material is not stockpiled onshore and viable solutions exist or can be developed for the processing and reuse of the material in Australia.

In the case of MobileMuster, AMTA ensures that it partners with leaders in the recycling industry to ensure that everything collected is recycled to the highest environmental standard. This can be seen by a high material recovery rate of 98%. MobileMuster's recycling partner [TES](#) is a leader in recycling and resource recovery and are certified ISO14001, OHSAS18001, ISO901, R2 and ASNZS5377. AMTA will continue to work with its strategic partners to ensure the highest recovery rates are achieved and look for onshore processing and material reuse when it comes to specified material types.

AMTA is supportive of growing Australia's circular economy and building a stronger onshore recycling industry. MobileMuster is already exploring an onshore solution for the plastic being collected and recycled through the program.

Conclusion

AMTA supports the introduction of the Bills. The mobile telecommunications industry is a strong advocate of a voluntary approach to product stewardship and recycling. MobileMuster is an example of a successful voluntary product stewardship scheme that is accredited by the Government and delivers strong and tangible environmental and social outcomes.

AMTA firmly believes that MobileMuster sets the benchmark for an industry led voluntary scheme and demonstrates how the mobile telecommunications industry has implemented, funded and managed a successful recycling program that is free and accessible to consumers. The ongoing commitment to the program by industry demonstrates that regulation is not needed in relation to mobile phone recycling and product stewardship in Australia. We encourage the Government to play a more active role in promoting existing product stewardship schemes such as MobileMuster and motivate consumers, all levels of Government and industry to be involved.