



CITY OF MELBOURNE

GPO Box 1603
Melbourne VIC 3001
Telephone (03) 9658 9658

29 January 2021

Right to Repair
Productivity Commission
4 National Circuit
Barton, ACT 2600

PRODUCTIVITY COMMISSION ISSUES PAPER – RIGHT TO REPAIR

Thank you for the opportunity to provide feedback on the Australian Government Productivity Commission Right to Repair Issues Paper, released 7 December 2020.

The City of Melbourne welcomes the Right to Repair Issues Paper and supports the introduction of measures that improve product reparability. In July 2019, Council adopted a [Waste and Resource Recovery Strategy 2030](#) (Strategy) which is based on the principles of circular economy and the waste hierarchy. This Strategy aligns with the need for improved opportunities for repair, reuse and identifies widespread extended producer responsibility as a key opportunity for Australia to adopt.

Action 5.2 of the Strategy states that Council will *advocate to other levels of government for stronger extended producer responsibility and container deposit scheme requirements to improve design and production*. The strategy aims to influence the introduction of at least one new extended producer responsibility scheme by 2023.

Council is able to contribute to specific information requests outlined in this issues paper, where Council has access to relevant data, evidence and insights from which to draw commentary, including:

- Council's role as waste collector, observing the downstream systemic impact of unreparable consumer items.
- Difficulties associated with collecting waste items and the negative impacts on city amenity.
- Challenges to recycling this waste, and the impact on landfill where no recycling opportunities exist.
- Residential e-waste and hard waste disposal volumes, shifting trends in volumes disposed and council waste service utilisation.
- Community sentiment calling for democratisation of repair knowledge and access to shared repair facilities, tools and shared learning experiences.

Council's core service is to remove waste but in order to participate in a circular economy and to support the Melbourne's transition to a circular economy, policy change at a federal level is imperative.

Below are specific responses to the information requests in the Right to Repair discussions paper.

Information Request 1

a) *What would a 'right to repair' entail in an Australian context? How should it be defined?*

City of Melbourne's Waste and Resource Recovery Strategy 2030 sets out a vision of a future that includes community members having access to products that are designed to be durable and repairable, as well as opportunities to repair them.

Information Request 2

b) *What types of products and repair markets should the Commission focus on?*

The Commission should focus on products collected by City of Melbourne for disposal or recycling under the below service streams. These streams have high volume potential and consist of products that can be readily repaired:

E-waste - City of Melbourne collected 37.4 tonnes of e-waste during 2019/20.

Hard waste - This includes items such as furniture, homewares, textiles and footwear, building materials, carpets, and white goods. City of Melbourne collected 1,575 tonnes of residential hard waste in 2019/20, 23 per cent of which was recovered for recycling.

Human welfare items – This includes therapeutic goods, assistive technology and aides such as glasses, wheelchairs, walking supports, adapted tools, specialised furniture and homewares.

c) *Are there common characteristics that these products share (such as embedded technology and software or a high/low degree of product durability), and which characteristics would allow policy issues to be considered more broadly?*

Common characteristics shared by the products listed above include:

- Products contain finite resources
- Products are energy intensive to create
- Products are hard to recycle through existing recycling schemes and council services
- Products can be prohibitively expensive to repair
- Products cannot be easily fixed by a lay-person as special knowledge, tools and parts are often required.

d) *If there are particular products that the Commission should focus on, what are the unique issues in those product repair markets that support such a focus?*

E-waste is a particular focus due to:

- Electronic components are found in a huge variety of consumer goods including homewares, toys, appliances and communication devices.
- Repair of these items is often prohibitively expensive
- Qualified or licenced repairers are often required
- There may be safety concerns once an item has been repaired
- Difficulty sourcing spare parts and equipment.
- Repairs from 3rd party repairers can void product warranties

Human welfare items a particular focus as they are:

- Of high value to individuals and the community, improving the quality of life of users.
- Can be expensive to purchase and prohibitively expensive to repair.

Hard waste, including furniture, homewares, textiles and footwear, building materials, carpets and white goods:

- The repair market is not currently mature enough to cater to the variety or volume of products requiring repair,
- It is often cheaper to purchase a new replacement product rather than repairing an existing product.

Information Request 6

c) How does planned obsolescence affect repairers, consumers and the broader community in Australia?

E-waste is the fastest growing waste stream in Australia and so City of Melbourne has been regularly asked by our community to offer more e-waste recycling drop off points.

City of Melbourne regularly receives requests from our community for more repair hubs and repair cafes. This demand for access to repair facilities demonstrates a community sentiment focused on eliminating waste and extending the value of items through repair, rather than discarding items and purchasing new items.

d) What are the benefits, costs and risks of Australia adopting measures similar to those currently used overseas, such as product design standards and reparability ratings?

Right to repair measures would support Australia's shift towards a circular economy and contribute to resetting consumer expectations regarding durability and reparability of products. This may influence consumer trends away from items that break easily or are difficult to repair.

Benefits to local councils include reduced costs of managing community e-waste and hard waste, as disposal of these items should reduce.

e) Do consumers have access to good information about durability and reparability when making purchases? If not, how could access to information be improved?

Through consultation with community, City of Melbourne is aware that this consumer information is generally not available when making a purchase.

Community has told us that, if an item is not repairable or not economical to repair, they would like this to be indicated on the packaging. It has also been indicated that, after a certain price point, it would be helpful to see the average cost of repairing the item shown on product packaging. The community has also indicated that the warranty period should be clearly shown on the product packaging with the length of warranty aligning with the price point.

Information Request 7

a) What data are available on the amount of e-waste generated in Australia?

a. What data is there on the composition of e-waste in terms of particular materials (such as hazardous materials) by product type?

City of Melbourne collected 37.4 tonnes of e-waste during 2019/20 through bin collections and bulk haulage.

Batteries are collected as a separate e-waste stream wherever possible and batteries mixed with other e-waste are sorted at the transfer station and transported to a local recycler.

b) *How much of Australia's e-waste is shipped overseas for recycling? Is there evidence of circumstances where this creates problems for recipient countries?*

E-waste collected by the City of Melbourne is sorted and processed locally whenever possible.

c) *What are Australia's current policy settings for managing the potential environmental and health effects of e-waste (such as landfill bans, the National Television and Computer Recycling Scheme or Mobile Muster)? Are these policy settings broadly right — that is, are they proportional to the impacts of e-waste on the community?*

The Victorian Government has banned e-waste to landfill. While some grants have been provided by state government to cover costs, Councils currently carry the majority of financial and administrative burden of providing residents with e-waste drop off points, collection and processing costs.

d) *How can a right to repair policy further reduce the net costs of e-waste in Australia, and would such an approach be an effective and efficient means of addressing the costs of e-waste to the community?*

City of Melbourne provides e-waste collection locations for its residents. Costs associated with this service include:

- Provision of collection containers
- Contractor costs for collect, transport and sorting of e-waste
- Cost of e-waste processor accepting the products for recycling
- Provision of special e-waste drop off points at events
- Community education activities including signage and communications.

Some state government grants are available to cover these costs, though the value of the grants does not cover the full cost of providing the service.

A right to repair policy would reduce the net costs associated with e-waste as e-waste generation would reduce. A reduction in collection, transport and processing costs could be evident.

Consumers would also see savings as, while initial product cost may be higher, longevity of the item would result in replacement products not needing to be purchased as regularly.

Information Request 8

a) *What policy reforms or suite of policies (if any) are necessary to facilitate a 'right to repair' in Australia?*

Right to repair sits within the Extended Producer Responsibility scope as the longevity, repair and end of life processing of materials are all key components of this responsibility.

b) *Are there any other barriers to repair and/or policy responses that the Commission should consider?*

The Commission should consider:

- Requiring information regarding the ability and cost to repair a product being made available to consumers prior to and at the point of purchasing products.
- Improving availability of information regarding how and where items can be repaired.
- That longer warranty periods may increase buyer confidence in purchasing more expensive but higher quality products.

c) *What are the costs and the benefits of the various policy responses that have been proposed to facilitate repair (such as those outlined in table 1)?*

- Greater warranty periods indexed to the product price point are important, and may address the manufacturers concerns over IP and consumer safety.
- Duty to deal, spare parts and diagrams should be made available post warranty to registered repairers for a reasonable period of time.
- Replacement parts should be generic or easily replicable so that, if the manufacture stops producing spare parts, other parties can produce them.
- Product design standards: If the product has a planned obsolescence period this should be stated on the product packaging and reflected in the price point.
- Information and labelling regarding product reparability and product durability is a key component of Extended Producer Responsibility. Information that is easily accessible by consumers regarding expected product lifespan and post warranty reparability is also important.

Thank you for the opportunity to respond to this issues paper. For more information please contact me on the details below.

Yours sincerely

Deb Cailes

Director Waste and Recycling
City of Melbourne