



**Australian Government**  
**Department of the Environment**

Mr Jason McNamara  
Executive Director  
Office of Best Practice Regulation  
1 National Circuit  
BARTON ACT 2600

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Dear Mr McNamara

## **REGULATION IMPACT STATEMENT – FINAL ASSESSMENT**

I am writing in relation to the attached draft Regulation Impact Statement (RIS) prepared for the National Television and Computer Recycling Scheme: Enhancements Arising from the Operational Review.

I believe the RIS meets best practice requirements and is consistent with the ten principles for Australian Government policy makers. The RIS is consistent with advice provided by you over the course of the last few days.

In particular, I note that the RIS addresses in full the seven RIS questions, and addresses the comments you provided on the second pass RIS:

### ***Problem identification***

- **Regulatory issues associated with the target trajectory.**

The description of the problem associated with the target trajectory has been clarified and additional supporting evidence has been provided. The analysis shows that the scheme's established trajectory for increasing recycling from an estimated 17 per cent of the available waste prior to the scheme's introduction, to 80 per cent in 2021–22, has contributed to instability in the e-waste recycling sector that is impacting disproportionately on disadvantaged workers.

The RIS outlines that a number of Australian Disability Enterprises, which provide employment for people with disability, were recycling e-waste before the scheme was developed. Current market conditions are making it difficult for these firms to survive. Three firms ceased operating in 2014. The remaining firms provide around 200 supported jobs for people with disability, which is around 1 per cent of all placements supported by the Department of Social Services.

The RIS concludes that the benefit of adjusting the target trajectory to reduce the risk of losing these positions is greater than the cost of doing so.

- **Further uptake of Australian Standard 5377.**

The RIS has been updated to clarify that current provisions underpinning sound health and safety and environmental performance may be inadequate, but that the evidence does not support introducing additional regulatory measures at this time.

The final decision point on the proposals in the RIS will be the approval of amendment regulations by the Governor General in Council, which is scheduled to occur on 25 June.

I submit the draft RIS to the Office of Best Practice Regulation for final assessment.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'M. Thompson', with a long horizontal stroke extending to the right.

Malcolm Thompson  
Deputy Secretary  
Department of the Environment

22 June 2015