



Office of Circular Economy
Department of Environment and Science
Queensland Government

Submitted via email: eproductsfeedback@des.qld.gov.au

21 April 2023

Dear Sir/Madam

Clean Energy Council Submission to Draft Queensland E-Products Action Plan

The Clean Energy Council (CEC) welcomes the opportunity to provide feedback to the Office of Circular Economy, Department of Environment and Science on the proposed actions and priorities in the Draft Queensland E-Products Action Plan (Draft Plan).

The CEC is the peak body for the clean energy industry in Australia. We represent and work with Australia's leading renewable energy and energy storage businesses, as well as accredited designers and installers of solar and battery systems, to further the development of clean energy in Australia. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

We applaud the Queensland Government's development of an e-waste action plan. As is highlighted in the Draft Plan, Australia makes a significant contribution to the global problem of e-waste, which continues to rise and requires a solution. This represents both a challenge and an opportunity, namely the significant commercial opportunity considering the growing value of components of particular e-waste, such as batteries and solar panels. There is also an active and growing industry concern regarding the imminent deluge of solar PV panels and counterparts coming to their end of life and the growing demand for PV recycling capacity.

The CEC has continually collaborated with industry, universities, regulators, government and waste bodies in relation to the product stewardship of solar PV panels and home batteries. The CEC is uniquely placed to provide insight into such an initiative, given our membership of over 1,000 companies including the leading solar panel manufacturers, distributors and solar recyclers, rooftop solar businesses and developers and operators of utility-scale solar projects. The CEC engages with over 1400 solar retailers through our New Energy Tech Consumer Code (NETCC) program and over 9000 installers through our Accredited Installer program. The CEC's Product Assurance program currently has over 4,863 PV modules and 96 manufacturers approved.

The CEC welcomes Queensland's Draft Plan, in particular, the following key actions:

- Regionally based transport and logistics coordinators in local government to optimise the collection, transport and recycling of e-waste in regional, rural and remote areas. Solar PV and related components are heavy, bulky and not simple to decommission and

transport by a layperson. Decommissioning a PV system requires skilled personnel to avoid accidents such as electric shocks. Additionally, the energy stored in an old battery may have the potential to ignite a fire or electrocute a human if handled incorrectly. The improper dumping of battery systems at regional transfer stations or landfill locations may also lead to risk of fire or injury. Given the nature of these materials, a specialised approach is required to ensure that appropriately qualified personnel work on removing systems from sites.

- Mandatory national product stewardship schemes, including that of PVs, thereby ensuring for nationally consistent processes and procedures to be implemented.
- Desire to grow recycling capacity for all of Queensland, which is hoped will incorporate growth in PV recycling and recovery.

Given the current work the Department of Climate Change, Energy, the Environment and Water (DCCEEW) are doing in terms of developing a national e-stewardship scheme, the CEC welcomes Queensland's Draft Plan, which will align with the development and implementation of a national e-stewardship scheme.

The CEC runs a working group focussed on the manufacturing and life cycle of clean energy products, with a particular focus on the product stewardship of a solar PV systems. The working group sees product manufacturers and material recovery facilities come together to discuss and collaborate on particular elements of product stewardship. Previously, the working group has collaborated on responding to the DCCEEW's issues papers on an e-stewardship scheme. And currently, the working group is considering the main challenges associated with and the appropriateness of reusing particular parts of a solar PV system, including the panels themselves, inverters etc. With the Draft Plan's focus on repair and reuse, the CEC will be able to share the insight in due course. Furthermore, as has been articulated in emails to your office, the CEC would welcome facilitating engagement with our members.

The CEC is interested in engaging and collaborating with the Queensland Government in the development of the Action Plan and its implementation. We would welcome the Office of Circular Economy's engagement at your earliest convenience.

Thank you for the opportunity to comment and if you would like to discuss any of the issues raised in this submission, please contact Emily Perrin on eperrin@cleanenergycouncil.org.au.

Yours Sincerely



Emily Perrin
Policy Officer, Distributed Energy
Clean Energy Council

ANNEX 1: PROPOSED FRAMEWORK OF PRODUCT STEWARDSHIP OF SOLAR PANELS

EPR (Extend Producer Responsibility) fee covers tracking and tracing, data management, materials recovery and freight and processing;

