



**TCF Submission to MFE on proposed regulations on importing and exporting e-waste  
28 August 2024**

**Introduction**

1. Thank you for the opportunity to respond to the [consultation on proposed regulations on importing and exporting e-waste](#).
2. This submission is made on behalf of the New Zealand Telecommunications Forum (TCF) Product Stewardship Group. The TCF is the telecommunications sector's industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. TCF members include providers of fixed line (fibre and copper) and mobile networks, retail service providers, wireless ISPs and tower companies. Member companies represent 95 percent of New Zealand telecommunications customers.
3. The focus of our submission is the likely impacts of the proposed regulations on the telecommunications sector.

**Telecommunications and e-waste**

4. As a sector we are investing in sustainable practices, encouraging the adoption of greener devices and promoting e-waste recycling programmes. This includes RE:MOBILE, the telecommunications sector's product stewardship scheme aimed at reducing the environmental impact of unwanted mobile phones and their accessories via a circular economy solution. The TCF is in discussions with MFE about becoming one of the accredited/regulated schemes for priority products.
5. 62,890 mobile phones were collected through the RE:MOBILE Scheme in 2024. Since its inception in 2015:

- a. 821,813 mobile phones have been collected
  - b. 147.4 tonnes of e-waste diverted from landfill
  - c. 317 tonnes of carbon dioxide emissions have been avoided.
6. Our members also work with e-waste companies who ensure e-waste is recycled or disposed of responsibly and in accordance with government regulation and Environmental Protection Authority (EPA) permit requirements.
7. Information on TCF member e-waste recycling can be found in their annual sustainability reports. To provide an example, here is some information from the One NZ sustainability report for 2024:
  - a. One NZ recovered almost 10 tonnes of operational electronic waste (e-waste) in FY24, and only one percent was sent to landfill.
  - b. In the 2023 calendar year, 3.3 tonnes of mobile phones went through the One NZ Trade-In programme.

#### **Impact on the telecommunications sector**

8. The TCF supports New Zealand's decision to implement the decision under the Basel Convention to better manage international trade in e-waste, and to introduce or amend regulations to give effect to this commitment. Including all e-waste under the transboundary movement controls is a necessary step.
9. It is expected that businesses will face new administrative and compliance requirements, including the need to apply for permits for non-hazardous e-waste. This could lead to increased operational costs and a more complex regulatory environment. MFE has asked businesses to comment on the likely impacts.
10. Our view is that given New Zealand's already strict interpretation and definition of hazardous waste, the impact on businesses should be minimal, as most companies dealing with e-waste should already have the necessary permits in place.
11. However we would expect an increased administrative workload for the EPA, and the EPA will need to be resourced for this. If the EPA is to introduce a permit application fee, we suggest a fee of no more than \$1000. The fee should cover the cost of the EPA providing comprehensive support for businesses navigating the permit process. We are of the view that the EPA should take an active role in encouraging compliance rather than creating additional barriers for businesses.
12. The support provided by the EPA should include clear guidelines and examples of what is required to obtain a permit. This will ensure that businesses understand the expectations and can meet them without unnecessary complications. Having

provided this support, the EPA will also need to apply strict enforcement of the regulations to ensure compliance and prevent illegal e-waste dumping.

**Regulations are needed for e-waste treatment**

13. Though outside the scope of this consultation, we note New Zealand currently lacks domestic regulations for e-waste treatment. Addressing this gap should be a priority to ensure we can lead by example in global e-waste management.

**We are happy to discuss further**

14. The TCF is happy to answer any questions the Ministry may have about the views set out in this submission. Please contact penny.sutcliffe@[tcf.org.nz](mailto:tcf.org.nz) in the first instance.