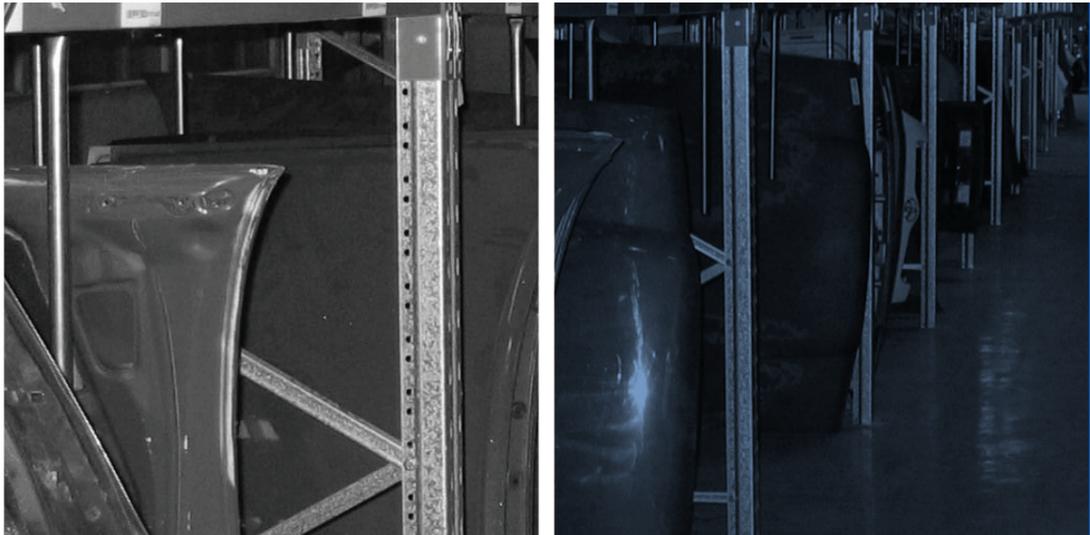


VACC ADRD commentary on EPA Automotive Dismantling Guidelines

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VACC ADRD Commentary on EPA Automotive Dismantling Guidelines

The team at EPA Vic must be commended for their hard work and initiative which could make a great contribution to improving industry standards.

There are a few points that all stakeholders must keep in front of mind if industry expect to achieve anything from our involvement with this EPA industry guide.

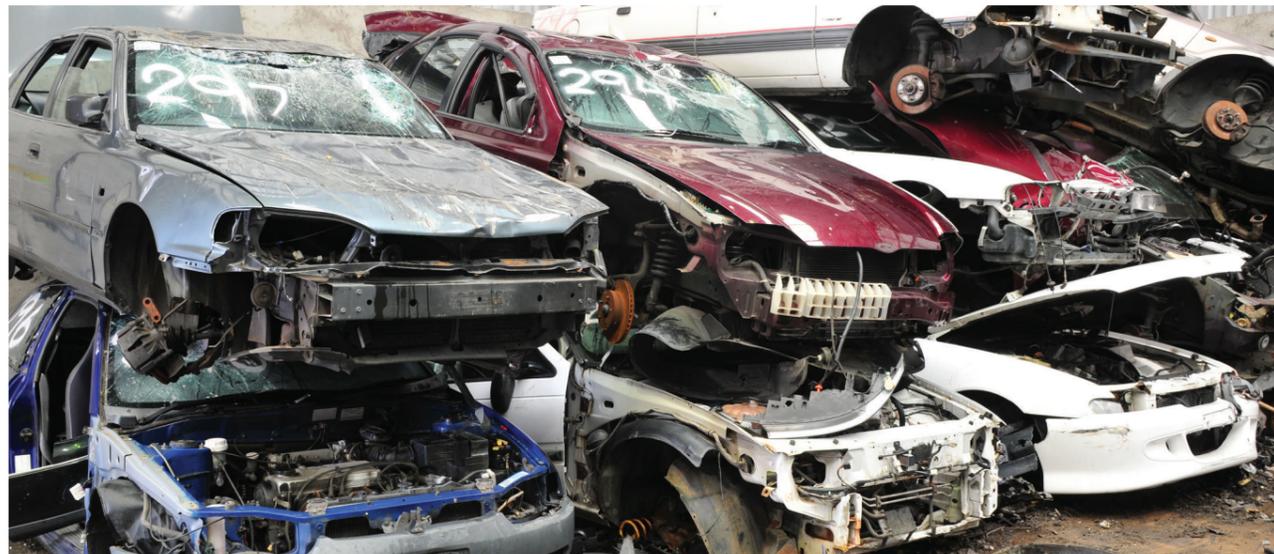
Statutory written-off vehicles

Key ADRD recommendation

ADRD would urge EPA to legislate that any Statutory Written Off Vehicle is defined under the EPA Act as a waste or prescribed waste product to be handled by approved registered contractors in future.

There is no such thing as half standards

- When we set standards for the industry it is not about finding a level somewhere between bad and good but more about where we need to be in order that we become relevant to the rest of society and appreciated for the essential service we provide in dealing with its waste.
- Industry standards should be based upon how the current state of knowledge can reasonably be accepted as industry bench mark for best practice. For this purpose and reflecting the current demographic of industry any new guidelines must be prepared in a variety of languages.
- There was a view that EPA should not necessarily use photos of the top elite yards as it may stick in the minds of enforcement officers that every yard is expected to be of this standard, regardless if it is profitable to operate this way.



- Certainly, any new facilities should be required to meet the latest standards whereas existing facilities should be given strong incentives to continually improve their operations to reduce risks.
- The current guidelines provide a lot of information that is hidden in other Guidelines & Standards in pages 34-35. Links will assist. It should also be noted that industry participants are unlikely to purchase standards from Standards Australia
- Every business should be engaged in a continuous improvement program or risk falling behind community expectations and become irrelevant to society.

The issue of End of Life Vehicles must be factored in

- It is important that Government takes note that the inherent value in End of Life Vehicles (ELVs) is diminishing.
- The waste content is increasing so it should be a burden for the whole of society not just car recyclers.
- ELVs must be officially classified as waste and regard the same way as other consumer waste items. Industry can see no reason why they should be regarded differently.
- Society cannot expect the recycling and dismantling to continue to deal with its waste on the basis that we will forever cover the cost of processing by the chance of selling some parts.
- Many ELVs have little or no recoverable value so why we industry process/touch them. This is not practical nor viable in 2019.

Key ADRD Recommendation

ELVs need to be officially classified as waste and regarded the same way as other consumer waste items. Industry can see no reason why they should be regarded differently.



The industry approach

VACC has approximately 120 Automotive Dismantler and Recyclers Division (ADRD) members who can be contacted, informed and assisted with improving their businesses in accordance with the EPA's new guideline.

How many other Auto Recycling enterprises are out there? The most recent research created by Victoria Police during Taskforce Discover indicated that in 2014 there were approximately 434 dismantlers or identified under Victoria Police criteria as a dismantler (or referred to as a wrecker) This could be hotly disputed.

It is ADRD view that unless a critical mass of the industry participates in this EPA initiated improvement program then any guidelines will only focus upon the legitimate businesses, the non-legitimate or registered will not penalised and fly under the radar.

VACC would urge the Regulators to create a list of all identifiable industry participants so they have an industry group to deal with. Without it everything is a waste of time. VACC has raised this issue before with the Government, most recently during the consultation period for the legislation to ban cash payments for scrap. Consumer Affairs Victoria were not in favour of the creation of such a register, thus making their own legislation all the more ineffective. VACC offered to host any such register at its own expense but this offer was declined.

Key ADRD Recommendation

EPA creates a publicly accessible data base on all identifiable dismantling industry participants.

ADRD also would endorse the Inclusion of a practical Self-Assessment checklist to enable Auto Recyclers to undertake risk assessments and environmental improvements which comply with EPA regulatory requirements.

Members have advised that they have recently read a number of EPA publications for the first time. It is no surprise to VACC that industry didn't know they existed. These were first discovered during reading or referred to in the EPA draft. VACC has had a prominent member comment "It is good to note that EPA have been doing their good work all along but no one told me. We are all expected to be aware of their content. This new guide will be the same. No one will know about it and they certainly won't be engaged in an industry standards improvement initiative".

Key ADRD Recommendation

EPA in conjunction with CAV and other regulators invest in promoting new guidelines.

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