

Product Stewardship Schemes and Regulation

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APVI response to Consultation Issues Paper 3: Targets and Obligations - E-Stewardship Regulation

The Australian PV Institute welcomes the opportunity to provide feedback on the E-stewardship Regulation Issues Paper 3: Targets and Obligations. The APVI is an association of companies, government agencies, individuals, universities, and research institutions that work together to support the increased development and use of PV through research, analysis, and information. In addition to Australian activities, we provide the structure through which Australia participates in the International Energy Agency (IEA) PVPS (Photovoltaic Power Systems) and SHC (Solar Heating and Cooling) programs, which in turn are made up of a number of activities concerning PV and solar system performance and implementation.

The IEA PVPS Task 12 PV sustainability working group has 32 experts. This group discusses high-level regulatory challenges in PV waste management in European countries under the WEEE 2012/19/EU Directive, which should be considered in the Australian context. Below are our recommendations regarding key targets and obligations for PV systems.

1. Include reporting obligations for repurposing/reusing off-grid PV systems to meet reasonable collection targets under the WEEE generated approach.

We recommend adding separate reporting/downstream tracking requirements to distinguish end-of-life and repurpose, especially for off-grid PV systems. Many Australian mining sites have installed off-grid PV systems. When the mining sites are closed, it is likely to repurpose the entire relatively young PV systems somewhere else. Repurposing is not end-of-life and does not fall under the waste volume using WEEE generated approach. It is important to specify reporting obligations for end-of-life PV systems and systems that will continue working but undergo decommission and recommission processes. For example, DCCEEW's e-stewardship report estimates that 11010 tons of PV waste (equivalent to approximately 165 MW) will be generated in Australia in 2023. Repurposing a 200 MW off-grid solar farm is enough to drive the collection target beyond 100% under unclear reporting obligations.

2. Include a downstream tracking obligation to supplement the recycling target.

We recommend transparent and harmonized recycling and recovery rate reporting obligations, including tracking downstream information on how recovered material is used. For example, when 10 tons of copper cables are removed from the solar panels by a PV recycler and sent off to a downstream recycling company to recover copper, under Germany's reporting obligation requirement (without downstream tracking obligation), 10 tons of copper cables are sent off, therefore the recovered mass is 10 tons. However, under French reporting obligations, which require a two-level downstream tracking, 9 tons of copper can be recovered from 10 tons of copper cable, therefore the recovered mass is 9 tons. We recommend the downstream tracking approach to supplement the recycling target.

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