

8 November 2024



Submission to Productivity Commission's consultation on:

# Opportunities in the circular economy

8 November 2024

Productivity Commission

Via email: [circular.economy@pc.gov.au](mailto:circular.economy@pc.gov.au)



Dear Sir/Madam,

The Australian Mobile Telecommunications Association Ltd (AMTA) welcomes the opportunity to provide this submission in response to the consultation paper, *Opportunities in the circular economy*.

The AMTA is the peak industry body of Australia's mobile telecommunications industry. Our purpose is to be the trusted voice of industry, promoting the adoption, monetisation and sustainability of mobile telecommunications technology for the benefit of all Australians. AMTA members include the mobile network service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry.

The consultation paper notes that some industries are already reducing their materials use in ways that meet commercial, environmental and social objectives, and the telecommunications industry is no exception. We note that the Productivity Commission welcomes examples where circular economy activities have been successfully pursued, ideally with detailed information on the type and scale of benefits, costs and other impacts and this submission seeks to detail the success of the MobileMuster program.

MobileMuster is a fantastic example of what can be achieved when an industry works as a collective to make a difference. The program commenced back in 1998 with Telstra, Motorola, and Nokia as founding members. Within 12 months other key industry participants joined the program, namely Ericsson, Optus, Samsung, Vodafone (now TPG Telecom), and soon other manufacturers followed suit. In 2017 we also welcomed Apple and Google to MobileMuster. Our members support the program voluntarily, enabling us to continuously improve and innovate.

Since the program's inception, we have:

- Collected and recycled over 2,000 tonnes of mobile phone waste;
- Diverted nearly 90% of products collected from landfill;
- Ensured that more than 90% of the Australian population lives within just 10km of a MobileMuster drop-off point;
- Welcomed the participation of 96% of mobile phone manufacturers and 85% of mobile network carriers operating in Australia; and
- From May 2014, achieved accreditation under the Australian Government's *Recycling and Waste Reduction Act 2020*<sup>1</sup>.

We have now collected over 16 million mobile phones and their accessories. In 2022, in keeping with our continued innovation and improvement, we expanded the program to include products such as modems and routers, smart home tech, wearables, and peripherals.

If you have any queries or comments in relation to the content of our submission, please contact Louise Hyland

Louise Hyland  
Chief Executive Officer

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<sup>1</sup> At the time of publishing, MobileMuster's application for re-accreditation is being assessed by the Department of Climate Change, Energy, the Environment and Water.

## Introduction

The Australian Government has asked the Productivity Commission to undertake an inquiry into Australia's opportunities in the circular economy to improve materials productivity and efficiency in ways that benefit the economy and the environment.

### Overview of MobileMuster

MobileMuster is the federal government accredited product stewardship program<sup>2</sup> of Australia's mobile telecommunications industry. MobileMuster is funded by major handset manufacturers and network carriers to provide a free mobile phone recycling program to the highest environmental standard.

The program was accredited (until May 2024) under the Australian government's *Recycling and Waste Reduction Act 2020*, which stipulates annual key performance indicators related to the volume of mobile phones and accessories collected (tonnes), annual collection rate, landfill diversion rate, recycling rate, and program accessibility. Our application for re-accreditation is currently being processed.

Since 1998, millions of Australians have recycled their mobile phones through the program. In the last financial year, MobileMuster:

- Collected 109 tonnes of mobile phones and accessories;
- Achieved a collection rate of 15%;
- Diverted 95% from landfill; and
- Achieved a recycling rate of over 95%.

AMTA considers that a circular economy should be designed to support the repair, re-use and recycling of products so that the materials that have gone into making them retain their value and can continue to be re-used. MobileMuster helps to develop the circular economy in Australia, specifically by:

- strengthening the collection of unwanted mobile phones, chargers and other accessories;
- supporting industry repair and re-use programs to increase the lifespan of mobile phones;
- improving the material recovery process in recycling; and
- reducing the number of mobile phones in storage.

MobileMuster continues to lead in product stewardship and mobile phone recycling in Australia, working with its members and industry to identify opportunities to increase product usefulness while reducing environmental impact.

### The circular economy in Australia

We encourage the government to apply consistency and alignment with existing policy frameworks, to establish a robust circular economy framework in Australia. There are multiple initiatives underway at the Commonwealth and State and Territory levels, and a cohesive approach will help create a stable regulatory environment that supports Australia's circular economy. Variations in policies across jurisdictions can result in inefficiencies and complexities for businesses and stakeholders operating in multiple regions. A unified approach will also strengthen Australia's position in the global circular economy and attract sustainable investments.

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<sup>2</sup> At the time of publishing, MobileMuster's application for re-accreditation is being assessed by the Department of Climate Change, Energy, the Environment and Water.

We also encourage transparency from policy makers in the mechanisms employed to achieve Australia's circular economy outcomes. The government can enhance stakeholder engagement by openly communicating the proposed strategies, incentives, and enforcement measures involved in any proposed circular economy framework. Transparency in policy development and implementation will allow stakeholders to engage productively and will produce better monitoring and feedback to meet Australia's sustainability objectives.

## Detail on MobileMuster

### Accreditation

Product stewardship involves the shared responsibility for reducing the environmental, health and safety footprint of manufactured goods and materials across the life cycle of a product (including material streams). Accreditation enables industry led product stewardship arrangements to demonstrate to businesses and consumers that the arrangement has the Australian Government's stamp of approval. This provides confidence that the arrangement's environmental and human health outcomes have been verified and will contribute to Australia's recycling and waste reduction objectives.

The MobileMuster program first gained accreditation for the recycling of mobile phones and accessories in 2014 under the *Product Stewardship Act 2011*. In mid-2019, the program was successfully re-accredited under the Act for a further five years, until 2024. MobileMuster is currently in the process of renewing accreditation with the federal Department of Environment in respect of its mobile phone recycling program.

MobileMuster's Key Performance Indicators relate to collections, how accessible the program is to consumers, as well as mobile telecommunications industry participation. Achievement in one area drives greater success in another, as most clearly seen in the direct correlation between landfill disposal and collection network accessibility.

### Product scope

MobileMuster accepts all brands of mobile phones, chargers and accessories.

As an industry-led, voluntary program MobileMuster can easily adapt and innovate, including the ability to expand the categories of products recycled under the program. From 1 July 2022, the scope of the MobileMuster program was expanded to include:

- Modems, home landline phones and TV streaming devices,
- Smart speakers and smart digital hubs; and
- Smartwatches, smart pens, tracking tags and fitness trackers.

The expansion into additional categories of products delivers additional value to stakeholders by providing an effective and efficient process for recycling a broader range of e-waste. It also results in the diversion of a larger volume of hazardous materials from landfill and increases the recovery of greater volumes of valuable resources.

### Accessibility

A critical element of MobileMuster's success is network accessibility to enable ease of recycling. MobileMuster collection points include mobile phone retailers, including Optus, Telstra and Vodafone stores, mobile phone repair stores, workplaces, schools and zoos.

Local councils also provide collection sites at local government administration centres, libraries, or at waste transfer facilities. These are particularly valuable in regional and remote communities. Local councils are also often the first point of contact for residents and small businesses who want to find out where to recycle tricky items, like their old mobiles, and our local government partners perform

a crucial role in educating the community on why and how to recycle. MobileMuster also provides a free post back option through Australia Post.

### Re-use

To drive consumer consideration of other uses for products, MobileMuster runs campaigns throughout the year that encourage and promote reuse and partners with social enterprises to drive reuse. For example, during Domestic Violence Prevention Month in May 2024, MobileMuster partnered with DV Safe Phone to encourage Australians to donate their old working phones through [dvsafephone.org.au](https://dvsafephone.org.au). This supported a 137% increase in phone donations in May 2024 compared with 2023. This initiative aims to assist over 2 million domestic violence victim-survivors in leaving abusive situations and starting a new life.

### Industry participation

MobileMuster has very high industry participation, covering 96% of mobile handset manufacturers (Apple, HMD Global, HTC, Google, Motorola, Oppo, Samsung, TCL Mobile, ZTE) and accessory manufacturers and distributors (Force Technology).

MobileMuster members also include other entities associated with the product, such as the mobile network carriers (Optus, Telstra, TPG Telecom) and network connectivity manufacturers (TP-Link). The members pay membership fees to AMTA for the collection, sorting, and recycling of products.

### Environmental impact

MobileMuster is a carbon neutral program that maintains an active role in shaping Australia's environmental responsibility for the whole-of-life impact of mobile phones and components and continues to advocate industry leadership in tackling climate change and driving circularity.

MobileMuster's core focus is the sustainability of our environment. As such, we've been carbon neutral certified under the Climate Active Carbon Neutral Standard for Organisations since 2019.

MobileMuster will submit its application to be recertified as carbon neutral for FY24 in November 2024. MobileMuster works with independent consultants to calculate the greenhouse gas emissions generated by its activities, including fuel and electricity use and travel, to achieve carbon neutrality.

Establishing carbon reduction targets and implementing measurable actions to reduce emissions effectively is crucial, and we address any residual emissions by investing in projects that promote carbon reduction and biodiversity conservation. As part of our FY24 submission, MobileMuster will source carbon credits (t/CO<sub>2</sub>-e) to offset these residual emissions and support carbon reduction and biodiversity projects in Australia and overseas.

### Improving recycling capacity and quality

We encourage the Productivity Commission to consider the existing and future capacity and quality of recycling in Australia, which impacts Australia's capability to recycle and to participate in the circular economy.

If Australia is to play its proper role in the circular economy as a responsible global citizen, an end-to-end solution must be implemented to support success and there must be associated recycling capability. Any increase in recycling collections may result in a more visible issue of stockpiling of goods "awaiting recycling" due to existing exporting bans and an inability to execute the circular economy in Australia.

We also see opportunities for the Commonwealth to harmonise regulations with all States and Territories. States and Territories are responsible for managing their environments including banning disposal of e-waste landfill, each having their own controls in place.

## Education and awareness

MobileMuster invests significantly in consumer education and awareness. In 2021, MobileMuster was acknowledged for its significant commitment to consumer education and business engagement in keeping mobile phones out of landfill, taking home the award for Best Stewardship Outcomes (Scheme or Industry Collective) at the inaugural Product Stewardship Centre of Excellence Awards.

Throughout the year, MobileMuster runs a series of advertising campaigns to raise awareness of the program and our partners, build trust in the recycling process, and drive behaviour change to encourage greater recycling. MobileMuster runs multiple campaigns each year to create awareness of the how, where, and why of recycling, with the aim to build trust in the program. MobileMuster also provides practical curriculum material and engaging supporting resources for the classroom. Our education program allows students to look at the impact of mobile technology and encourages them to act for a sustainable future.

MobileMuster regularly partners with organisations such as the Salvation Army, DV Safe Phone and Zoos across Australia, to promote and raise awareness of mobile phone recycling while also raising funds for these charities and their programs.



Australian Mobile  
Telecommunications  
Association



Australian  
Government  
Accredited  
Product  
Stewardship  
Scheme