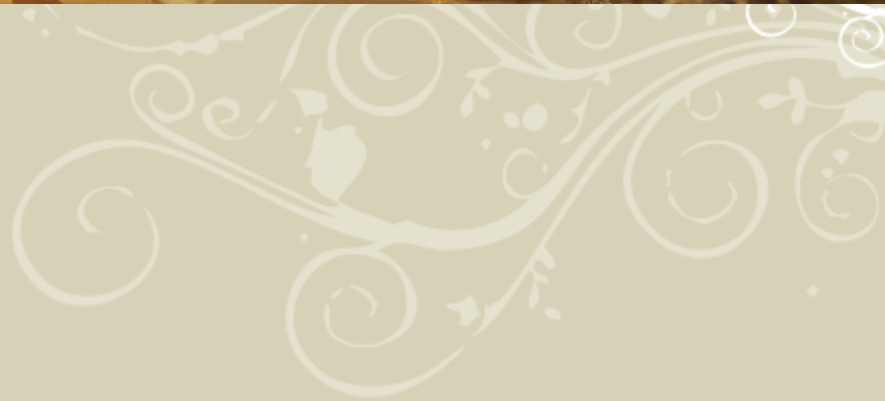


A National Waste Policy: MANAGING WASTE TO 2020

**Consultation Paper Submission
Moreton Bay Regional Council**



1. Are there opportunities to further coordinate, harmonise or streamline approaches to waste management across jurisdictions?

Yes in the following areas:

- National definitions for waste management terminology and waste types/streams including recyclable waste (eg waste, recyclable waste, green waste, construction and demolition waste, commercial and industrial waste, e-waste, household hazardous waste etc).
- National code of practice or regulations or guidelines for waste management activities eg standards for waste collection, transport, disposal and treatment.
- National standards for specific products/items relevant to waste management eg compost, waste and recycle bins, waste transport vehicles, bulk bins etc
- National litter campaigns and incentives
- National education curriculum for recycling / waste minimisation activities
- National take back schemes eg e-waste
- National product stewardships
- National labelling laws eg environmentally friendly / low carbon marking
- National benchmarking and auditing tools for waste management activities including the different waste technologies eg total life cycle analysis for carbon footprints of the different waste activities and treatments

Currently the majority of the above are different in each State, each Local Government area as well as being different between government and commercial sectors. Introduction of national standards for all the above even at a high level will help provide consistent waste management information and processes that can be utilised with more confidence for strategic planning and making investment decisions.

2. Are the categorisations, definitions and standards used to manage waste between and within the different levels of government effective and appropriate?

- Introduce national and uniform definitions, standards, regulations, champagnes etc for waste management activities as mentioned above.
- More leadership and clearer directions for Local Government from Federal and State Government regarding waste management categorisations, definitions, standards, policies etc

3. Do the current waste management frameworks across jurisdictions:

(a) Deliver an effective regulatory framework?

- No, in QLD there is currently no up to date State waste strategy/policy, targets etc. In addition the waste strategies/policies are different between States – more uniformity would be good.

(b) Provide an appropriate suite of approaches to address waste and resource recovery issues?

- No, a more uniform, national approach would be better. The National approach must be cognisant however, of the vast differences between urban, rural and provincial

communities. Many Local Governments are disadvantaged by distance, remoteness and small populations.

(c) Work effectively in conjunction with planning and other environmental legislation?

- No, the Local Government Planning Schemes need improvements as waste management requirements are currently not taken into consideration in either the Integrated Planning Act (IPA), the SEQ Regional Infrastructure Plan or in the Local Government Planning Schemes (eg for waste facility provisions, waste collection requirements such as provisions for waste bin storage, bin placement for waste collection and road requirements / vehicle access for the waste collection vehicles etc).
- No National Waste Management framework for planning schemes.
- There is generally a communication and knowledge gap between Planners and Waste Practitioners.

(d) Provide the right incentives to manage materials, products and waste sustainably and holistically?

- No, why are landfill levies seen as acceptable? Are there other economic instruments that would be more effective to “reduce waste to landfill”? Incentives and support should be provided for resource recovery initiatives rather than penalties for the lack of resource recovery. Some possibilities include:
 - Tax incentives or tax breaks to use recyclable materials.
 - Federal grants / incentives for new resource recovery industries and Alternative Waste Technologies (AWT) and the corresponding market developments for the recyclable materials produced by these industries.
 - Economic incentives to meet waste minimisation or recycling targets and the use of renewable energy

(e) Need improving, and if so, how could this be done?

- Yes, see comments in the above sections.

4. In the 1992 National Strategy for Ecologically Sustainable Development, COAG endorsed the strategies and objectives for a national approach to waste management (Appendix A). Looking ahead to the next decade, how could these strategies and objectives be updated to provide the basis for a national waste policy that responds to current and future challenges and opportunities?

- Changes are needed as it was produced in 1992 and as such some of the ideas are out of date. It should be thoroughly reviewed and updated using the feedback received from these submissions.

5. What waste issues would most benefit from a national approach? What strategies could be considered and how could the need for local solutions be integrated with a national approach?

- The following waste types, from all sectors ie domestic, commercial and industrial, would benefit from a national approach:
 - green waste and organics
 - construction and demolition waste
 - glass
 - e-waste
 - hazardous waste including Household Hazardous Waste, tyres and compressed fluorescent light bulbs (CFL)
 - plastics including plastic bags
- If a national approach was developed for these waste types it would assist to prevent these wastes ending up in landfill including dry/clean fill landfills for the recyclable construction and demolition wastes (eg concrete).
- A national approach to waste avoidance i.e to minimise what is created including reducing packaging waste and product turnovers (eg low life span equipment such as tools and other electrical goods).
- Retailers could be given more responsibility for end of life requirements for the goods they sell. This could be implemented by providing these companies incentives for recycling / resource recovery initiatives.
- Develop national landfill remediation standards and continue to provide funding for the remediation of contaminated sites.

6. Are there waste management initiatives in operation overseas that could apply in the Australian context? If so, which ones and why?

- Caution must be used before implementing overseas waste management initiatives as the drivers overseas can be totally different to Australian drivers. Australia can learn from overseas experiences, but we need to adapt the policies / initiatives / processes etc for Australian conditions.
- Some of the waste management initiatives in operation overseas that could or are currently being applied in Australia include:
 - Harvesting landfill gas to produce renewable energy
 - Eco labels that identify which products are more environmentally friendly and list the environmentally harmful components for example in computer systems
 - Product stewardship programs for problem waste eg e-waste, tyres. Waste oil and chemical drums are examples of local successful product stewardship programs.
 - Waste avoidance and cleaner production initiatives.

7. Australia needs to safely manage hazardous waste and waste containing hazardous materials over the long term. Are there any changes to current arrangements that would improve Australia's capability to safely manage hazardous waste, for example in regard to adequate infrastructure or disclosing the contents of goods and substances?

- Uniform national definitions for hazardous waste
- Uniform national requirements for the transport, tracking, treatment, recycling and disposal of hazardous waste. A Federal Government approach should be introduced for hazardous

waste treatment, transportation etc. Every State currently has a different list of waste types that are considered regulated waste.

- Local Governments don't handle much hazardous waste, generally only household hazardous waste and limited regulated waste such as asbestos, tyres and treatment plant wastes. Only some Local Governments currently have collection points for the separation and collection of these hazardous wastes. There needs to be collection points across all of Australia for the separate collection and treatment/recycling of hazardous waste.
- Facilities for hazardous waste recycling should be supported by Federal Government incentives as they are a resource recovery initiative. Hazardous waste recycling facilities need to be available in and across Australia.
- Introduce national standards for compulsory Eco labels that list the environmentally harmful components of the product for example in computer systems.

8. There are a number of approaches to product stewardship operating in Australia. What, if any, role is there for a national approach and what would be the costs, benefits, opportunities and focus of such an approach? What models might work in Australia?

- The container deposit legislation (CDL) in SA is too narrow as it just focuses on beverage containers. A similar system however, could be implemented Australia wide for all products including packaging and containers. Extending the CDL system to an advanced deposit funding scheme for all products might be a better economic instrument as it can target more waste types.
- A National Scheme is needed for all of Australia's problem wastes such as e-waste, plastic shopping bags and hazardous wastes including tyres and compressed fluorescent light bulbs (CFLs) etc. One recommendation for plastic shopping bags would be to ban them by 2012.

9. Are there any aspects of waste management that could be improved or streamlined through adopting national standards?

- Yes, as listed in Question 1.
- The national uniform definitions for waste management need to be layered / tiered to facilitate the collection of waste management information to varying levels of detail. The National Waste Data Base is currently impractical to use at a waste facility weighbridge as the transactions must be performed very quickly and a waste load will not be composed of one waste type/stream as per these definitions. A standard national high level /tier of waste type definitions could be utilised to record waste types entering a waste facility and more detailed tiers could then be utilised when waste stream audits were undertaken. The more detailed waste stream audits would need to be performed on a regular basis and should be governed by a national standard requirement. There also needs to be national standard methodology for collecting waste stream data to enable the comparable collection and reporting of this data. The waste definitions / categories must be able to be utilised for all the required data collection requirements eg for environmental protection agencies and for the Carbon Pollution Reduction Scheme (CPRS) requirements. Has the International Solid Waste Association (ISWA) got any definitions that could be used as National definitions in Australia?

10. What fundamental data sets does Australia need to collect to better inform waste management policies, practices, investment, business operations and to assess and manage risk?

- Consistent and correct information on municipal solid waste (MSW), commercial and industrial (C&I) waste, construction and demolition (C&D) waste and hazardous waste, for waste to landfill and materials diverted / reused / recycled, from all across Australia.
- Regular (eg annual) detailed analysis of waste and recyclable waste streams via waste stream audits
- Data needs to be consistent and reliable and needs to be collected using standard practical methodologies as mentioned above in the comments for Question 9.
- Need standard formulas or measurement methodologies to convert cubic metres to tonnes for the various waste types and recyclable/recycled products for waste facilities without weighbridges and when cubic measurements are utilised (eg surveyed mulch and crushed concrete piles).

11. What, if any, place should there be for approaches that seek to avoid waste through changes in design, production processes and transport?

- This could be expanded to include Smart / Sustainable Procurement practices. Some examples include a requirement to have recyclable content in products (eg wheelie bins to have 30% recycled content) and a recycled products policy inserted into contracts (eg a contract for the purchase of computers to require that the company supplying the computers will reuse / recycle the computers at the end of the contract i.e Take Back Policy)
- Cleaner production is a must.
- The commercial and industrial companies will need advice, education and encouragement. They may need to be shown how to improved processes that will reduce waste or have cleaner productions etc that could also save them money eg CPRS.
- Nationally how do we get this happening – national procurement policies that could link to funding opportunities or tax breaks if sustainable practices are utilised or link to enforcement tools such as environmental legislation eg CPRS
- National industry associations need to require their members to improve their processes to help minimise waste generated.
- Establish a group of “Eco Biz” Officers who can provide advice regarding the most efficient and sustainable management techniques for solid waste, water and energy use at C&I premises. See comments under Question 17 regarding “Eco Biz” Officers.

12. What changes could be made to improve management of the municipal waste stream and those of the commercial and industrial sector and the construction and demolition sector?

- Local Government traditionally focuses on municipal solid waste (MSW) / domestic waste. Some local governments also have processes in place to facilitate the recycling of C&I and C&D waste. However there is an opportunity for local governments to either implement or improve their processes to increase the recycling of waste from the C&I and C&D sectors.
- National education should be provided to the C&D and C&I sectors to assist them with determining how they can minimise waste.

- The C&I and C&D sectors should be required to have waste management plans that identify how they will minimise waste generated including waste minimisation targets. National legislation could be utilised to set this requirement.
- Local Government should be appropriately consulted and a Local Government focus group could be formed to review any proposed National waste management policies and directions.

13. Landfill is currently the primary means of waste disposal. What, if any changes need to be made to manage Australia's waste stream in the long term given current trends in the volume and nature of the waste?

- Landfills are still a viable option for the disposal of the residual waste in Australia and especially in Queensland. The amount of waste disposed of to landfill and/or the residual waste should however be reduced. Also the most cost effective, efficient and environmentally sustainable methods need to be utilised to reduce the amount of waste being generated and disposed of.
- The life expectancies of landfills in SEQ are still plentiful and if they are well engineered they are both an economically and environmentally viable disposal option. Fully engineered landfills are designed to contain any contaminants within the site and if operated correctly they should not cause any environmental harm. However, if an AWT is considered as a better alternative to landfills there is still residual waste that needs to be disposed of and as such you still need a landfill. AWT are however far more expensive than landfill facilities and they currently generate poor quality end products that have a limited market due to their contamination levels. These poor quality end products are therefore generally utilised for landfill remediation purposes only.
- More National campaigns and incentives are needed to both reduce waste and increase recycling which will minimise the waste required to be processed and treated as well as minimising the residual waste required to be disposed of to landfill.
- In Section 8.7 of the consultation paper it is suggested that because litter levels have been steady for at least the last three years no additional national action on litter is required at this stage. Litter, even if the amount is not increasing, is still an issue that needs to be further addressed nationally. A new national education campaign similar to the "Do the Right Thing" campaign, which was developed and used in the 1980's, needs to be implemented again to try and further reduce the amount of litter being generated.

14. Reducing the amount of organic waste sent to landfill has the potential to contribute to reducing greenhouse gas emissions as well as other potential environmental and economic benefits. What are the benefits and opportunities, costs and disadvantage of increased diversion and / or recycling of organics wastes?

- The CPRS appears to be driving us to bury all organic waste, collect landfill gas and produce green electricity. The CPRC should also be used to encourage the diversion of organic waste away from landfills (eg introducing green waste / organic waste collections) and to utilise the organic waste to generate a beneficial compost product. Why does composting not earn carbon offsets? Why is composting not considered to be carbon sequestration? The CPRS should be changed to include the benefits of composting for carbon sequestration and for the reductions in green house gas emissions. A compulsory requirement to utilise compost for carbon sequestration with agricultural activities could be

introduced under CPRS. Utilising compost will reduce the need for fertilisers that are currently being used as an easy cheap short term unsustainable option.

- Diverting green waste and organics from the waste stream can potentially divert up to 40 to 50% of the waste from landfill. There is huge potential not only in the domestic / residential waste stream but also in the commercial and industrial sector (eg food shops, food processors etc).
- Introduce National advertising campaigns to encourage Australians to either compost at home or participate in the local government green waste / organics collection schemes (both kerbside and self hauled to the waste management facilities). The advertising campaign should also encourage the use of compost on gardens, lawns, farms etc.
- Market development is needed for compost products to ensure that there are sufficient processors for the amount of organic waste material being generated and to ensure that there will be sufficient end uses for the compost product (eg compulsory carbon sequestration in the agricultural industry).

15. What, if any, changes are needed to the way e-waste is managed?

- Need to have a national definition for e-waste.
- A glut of televisions is expected over the next two years due to the analogue to digital changeover – so a system needs to be in place to manage this waste stream.
- A National take back scheme is needed, similar to Victorian “Byte Back” Scheme. Manufacturers need to practice product stewardship. Local Government would assist and cooperate by providing their waste facilities as receipt depots for e-waste.
- Encourage more e-waste processors / recyclers in Australia by providing as mentioned above either tax incentives or some other incentives for establishing new recycling facilities.
- A National or State list of licensed second hand dealers for e-waste products eg computers could be created to assist both the general public and Local Governments.
- As a minimum smart procurement practices should be introduced to ensure contracts have clauses regarding the reuse and recycling of e-waste products such as computers. For example there could be a national requirement for Government organisations (Federal, State and Local) and private companies who make large computer purchases to use smart procurement practices, which will use their market power to ensure the computers are either re-used or recycled.
- There would be a large re-use market for e-waste such as computers for people who can not afford to buy new. The provision of re-usable e-waste items should be encouraged.

16. The Carbon Pollution Reduction Scheme will apply to emissions from landfill. Are there related approaches that would complement the scheme and thus contribute to meeting the emissions targets and the timeframes set in the Australia government’s climate change policy?

- Yes, see comments for Question 14 on CPRS.
- Increase CPRS targets for use of renewable energy.

17. What are the opportunities to reduce water and energy use through the way waste is managed?

- Fully engineered landfill facilities utilise less water and energy when compared to other waste management technologies and they are also potential sources for generating renewable energy.
- Establish a group of “Eco Biz” Officers who can provide advice regarding the most efficient and sustainable management techniques for solid waste, water and energy use at C&I premises. This would include advice/education regarding waste avoidance, re-use and recycling, Sustainable Procurement, cleaner production techniques etc. The “Eco Biz” group could be established with a joint Federal / State / Local Government Scheme to take practical advice/ education to C&I premises. It could include simple on site audits that could result in the companies being pointed in the right direction. A list of firms who can assist them further could then be provided eg who recycles what.

18. In what ways can waste management and resource recovery (including recycling, re-processing, re-manufacturing) industries add further value to the economy and create employment?

- Identify the need for key regional facilities and encourage them to be built by either providing Federal Government funding or tax incentives for these facilities.
- Establish new uses and markets for the various recyclable materials that are currently not economically viable or feasible to recycle (eg e-waste, compost products) by using either incentives or legislation (eg agricultural industry using compost).
- Develop consumer confidence in recycled products by establishing national quality standards for these products.
- Provide incentives and support research and development for recycling problem wastes such as e-waste, hazardous waste, tyres, plastic bags etc.
- Introducing recycling initiatives such as green waste collections and processing including composting will create more job opportunities. These initiatives however will always rely on some form of user pays system. Green waste collections and processing can be undertaken at various levels depending on the community size and will therefore result in the corresponding degrees of increased employment opportunities. Some recycling and waste minimisation initiatives however may not be feasible for the very small rural communities.