

National Waste Policy Taskforce
The Department of Environment, Water, Heritage & the Arts
John Gorton Building
Environment entrance
King Edward Terrace
Parkes ACT 2600

Wednesday 13 May 2009

To whom it may concern,

The Australian Landfill Owners Association (ALOA) is grateful for the opportunity to prepare and present a submission in response to the national waste policy consultation paper.

Introduction:

ALOA is an incorporated entity comprising landfill owners across Australia sharing a concern for the environment and the sustainability of their businesses.

ALOA is the representative voice of the landfill industry in Australia. ALOA membership comprises landfill owners from across Australia.

ALOA members operate over half of the landfill capacity across Australia receiving over 12 million tonnes of solid waste annually. They also provide services in waste disposal, waste treatment and resource recovery and employ over 12, 000 people.

Today landfills employ cutting edge technology to minimise their environmental impact such as capturing methane generated by the decomposition of organic waste to produce renewable electricity.

In many respects, modern landfill techniques are a demonstration that corporate action can deliver complementary benefits to our society, the natural environment and business.

ALOA's submission reflects the views and opinions of its members including:

Alexandra Landfills P/L	Maddingley Brown Coal P/L
ACT Nowaste - Department of Territory & Municipal Services	Newcastle City Council
Blacktown Waste Services Pty Ltd	SITA Australia P/L T/A Sita
Boral Waste Solutions	Environmental Solutions
Brandown Pty Ltd	Thiess Services Pty Ltd
Breen Holdings Pty Ltd T/A Kurnell	Ti Tree Bioenergy
Landfill Company	Transpacific Industries Group Limited
EMRC	Veolia Environmental Services
Hanson Landfill Services	Western Land Reclamation Pty Ltd
Hi Quality Group	Wollongong City of Innovation
Integrated Waste Services	WSN Environmental Solutions
Lucas Waste Management Pty Ltd ATF	Wyndham City Council
The Lucas Property Trust	West Australian Landfill Services

Overview:

ALOA supports the Australian Government in its attempt to construct a national policy framework for managing Australia's waste streams. To assist in this process we offer the following comments and recommendations with regard to the paper and the proposed national policy framework.

Life Cycle Analysis ought to be promoted as the tool for assessing waste management options:

Historically, the 'waste hierarchy' has been the overarching framework for waste management. In the next decade, Life Cycle Assessment (LCA) should be utilised to inform waste management decision-making. Today waste management is impacted by processing and externalities costs, the uses of end products from different waste treatment and recycling options and as such LCA provides a more thorough and holistic way of assessing complex waste management planning options.

The inclusion of “Extended Producer Responsibility”

ALOA believes that national waste policy needs to include extended producer responsibility program to minimize the loss of value materials and to prevent toxic and hazardous wastes being deposited untreated into the waste stream:

For example, some e-waste contains both trace amounts of valuable materials and hazardous materials with the cost of extracting these materials being significantly greater than their intrinsic value.

As such, financial support is needed from deposit schemes or from buy back arrangements in order to support the processing of these wastes.

Extended Producer Responsibility (EPR or ‘Product Stewardship’) schemes are necessary to fund the processing of these difficult waste streams and to achieve optimum environmental outcomes.

Stimulating renewable energy production from landfills:

The production of renewable energy from waste should be stimulated and encouraged by the Australian Government through the National Waste Policy.

Depending on climate conditions, organic material deposited in a landfill can take up to 50 years to fully decompose generating green house gas emissions in the form of methane throughout that period.

Best practice landfill gas capturing techniques now allow for the capturing of this methane and the generation of renewable electricity.

Landfill gas-fired power generation is recognised as a renewable energy source under the Federal Government’s Mandatory Renewable Energy scheme, and also under the NSW Greenhouse Gas Abatement Scheme.

The conversion of organics to renewable energy, via anaerobic digestion in landfills, has significant greenhouse gas and resource conservation benefits and offers a reliable solution for a large proportion of Australia’s waste volume.

The landfill liners section of the consultation paper ought to be reviewed:

ALOA disagrees with the assertions surrounding the life expectancy of landfill liners in Section 8.6 of the consultation paper.

Synthetic landfill liners, as one element in a conventional composite liner, may have, in certain circumstances, a life of several decades. For example, based on current laboratory results, synthetic liner life is influenced by landfill temperature, and may be reduced down to tens of years if exposed to periods of high temperature.

Best practice landfill liners, however, consist of composite liners made up of a covered synthetic liner in combination with a clay liner. This provides redundancy so that if the synthetic liner does eventually fail, the clay liner can provide the necessary containment.

Further, in best practice Bioreactor landfills, the facility is designed to accelerate the decomposition of waste so that it is fully degraded, and therefore stabilised, within the normal lifespan of the synthetic liner.

Recommendations:

ALOA has a number of recommendations to the National Waste Policy Task Force. They are as follows:

1. That Life Cycle Analysis be adopted as the principle review technique in waste management planning at a macro level;
2. That best practice landfills move from the "dry-tomb" model of the 1980's to active digestion with leachate recirculation;
3. That Extended Producer Responsibility schemes be initiated in order to increase resource recovery and to remove potentially hazardous and toxic materials from the waste stream.

Conclusion:

As the official peak body representing the landfill industry ALOA wishes to engage with the Government to ensure that the National Waste Policy is both effective and efficient.

As such ALOA seeks to make in-person presentation to the National Waste Policy task force as soon as possible to expand upon the views included in this submission.

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