



LOCAL GOVERNMENT
ASSOCIATION OF THE
NORTHERN TERRITORY

Submission on the National Waste Policy:
Managing Waste to 2020
Consultation Paper

The Local Government Association of the Northern Territory welcomes the opportunity to make this submission to the Australian Government Department of Environment, Water, Heritage and the Arts, Waste Policy Taskforce on the consultation paper, "A National Waste Policy: Managing Waste to 2020". This submission contains comments and information that the Association believes is relevant to the inquiry.

This Submission has been prepared by officers of the Local Government Association of the Northern Territory (The Association) and is taken to represent the view of Northern Territory Local Government. However, individual Local Governments may have views that differ from the positions taken here.

Due to meeting schedules and the short timeframe of the consultation, this Submission has not yet been endorsed by the Association's Executive Committee or the Environment, Transport and Infrastructure Reference Group; however it will be put before these groups at the earliest opportunity.

The Association is recognised as the peak representative body for local government in the Northern Territory. The 16 local government bodies that are members of the Association include:

- 5 Municipalities,
- 11 Shires

The Association has federated nationally with other State Local Government Associations to form the Australian Local Government Association. One of the Association's roles is to effectively advocate and represent member councils in issues that will effect local government.

Waste management is an important local government service in the Northern Territory. Recent reform has seen the amalgamation of a number of small remote community councils into larger shire local government authorities. This process has also coincided with a new Local Government Act (July 2008) update, outlining waste management specifically as a core business of Local Government in the Northern Territory. The majority of communities within the Northern Territory, represented with Local Government Shires, are small remote communities, who face specific challenges when managing waste within their communities. It is important that communities be consulted when considering waste management options and involved in the implementation of waste management programs.

Introduction

For Local Government in the Northern Territory waste management is core business as well as an essential community service. Consequently, a proportion of this submission is dedicated to providing some context for Local Government waste services in the NT and considerations for this service.

A fundamental shift in assigning responsibility for waste management is necessary nationwide. The current situation of Local Government continuing assuming responsibility for the provision of waste management services for all products is not sustainable. Significant changes in consumer products means that waste is no longer simple, cheap or easy to deal with. As waste increases in volume and complexity so does our understanding of the impacts of waste on the environment, society and the economy.

The perceptions and understanding of waste management, its impacts, and waste reduction strategies would vary greatly between residents of a large coastal city (where the majority of Australians live) and, for example, a remote Indigenous community. These differences in perception and understanding could have a significant impact on a waste programs success or failure and so is a very important consideration. Unfounded assumptions on the willingness or ability of people to understand and participate in programs will often result in poor results, once the program is implemented on the ground, and an alienation of communities from government.

Recent reform has seen the amalgamation of a number of small remote community councils into larger shire local government authorities. This process has also coincided with a new Local Government Act (July 2008) update, outlining waste management specifically as a core business of Local Government in the Northern Territory. The majority of communities within the Northern Territory, represented with Local Government Shires, are small remote communities, who face specific challenges when managing waste within their communities. It is important that communities be consulted when considering waste management options and involved in the implementation of waste management programs.

To reflect these changes in the structure of Local Government in the NT, the Association is currently undertaking a major review of its environmental and waste management policies. However, priorities based on former policies, relevant to a national policy on waste include:

- **(7.6b) The management of waste within the “waste hierarchy” framework of the following priorities:**

1. Avoiding the creation of waste (reduce).

2. Minimise the creation of waste (reduce)
 3. The reuse of post production and post consumer products without any change to the form or composition of those products (reuse).
 4. The recycling of organic waste and post production and post consumer goods into new products (recycling).
 5. The responsible disposal of waste to environmentally acceptable means (disposal).
- **(7.8a) Strong support for the introduction of Container Deposit Legislation (CDL) as a litter control mechanism.**
 - **(7.8b) The introduction of regulatory and economic instruments to reduce litter and enable reasonable waste to landfill reduction, including:**
 1. Different taxing or tariffs on virgin material and recycled material.
 2. Container Deposit Legislation.
 3. A motor vehicle tyre deposit system.
 4. The use of products with the maximum recycled component.
 5. Levies or other price support mechanisms on materials and/or products which are not currently recycled for either economic or practical reasons.
 6. Legislation or controls which ban or restrict the quantities or use of materials on the basis of their excessive contribution to the waste stream, non-biodegradability and non-recyclability.
 - **(7.9a) Support for the principle that those who create waste should take full responsibility for that waste. In the case of industry, Local Government supports the imposition of legislation, regulations and incentive schemes which will compel industry to:**
 1. Introduce policies which will enable sectors of industry to reach mandatory waste reduction targets within a specified time frame.
 2. Accept “cradle to grave” responsibility for the products, waste and litter it produces, at both the production and post consumer stages.
 3. Adopt “closed loop” processes for the products and packaging it creates.
 4. Reduce the unnecessary packaging of goods.
 5. Use at least a specified percentage of recycled material in their production processes.
 6. Use only packaging materials which are capable of being recycled and have a marked as recycled material.

Questions raised in the consultation paper

The following specifically addresses questions raised in the Consultation Paper, where relevant to the position of Local Government and the Northern Territory.

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

Given current experience and concerns for Local Government there are certainly opportunities to ensure more effective waste management, particularly between various levels of government and between industry and government.

National campaigns on waste management should be prepared in consultation with a wider range of local communities. When determining national approaches to waste management it is important that local information is gathered and used. The perceptions and understanding of waste management, its impacts, and waste reduction strategies would vary greatly between residents of a large city (where the majority of Australians live) and, for example, a remote Indigenous community. These differences in perception and understanding have a significant impact on a waste program's success or failure and so is a very important consideration. Inadequately researched assumptions on the willingness or ability of people to understand and participate in programs will often result in poor results, once the program is implemented on the ground, and an alienation of communities from government.

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

The Association supports a shift in language away from the term 'waste' and focusing more on 'resource'. Once material is considered a 'waste' it becomes more difficult to deal with. There appears to be limited standardisation of terminology between States, Territories and the Commonwealth. Local Government similarly may use varying terminology and categorisation for material. These varying definitions can cause confusion if the specifics are not understood. However, if a nationwide standard for language and definitions is likely to prove complicated and costly, state and territory based dictionaries of terms relevant to each jurisdiction may be sufficient for reference.

- 3. Do the current waste management frameworks across jurisdictions:***
- *deliver an effective regulatory framework?*
 - *provide an appropriate suite of approaches to address waste and resource recovery issues?*
 - *work effectively in conjunction with planning and other environmental legislation?*
 - *provide the right incentives to manage materials, products and waste sustainably and*

holistically?

- *need improving, and if so, how could this be done?*

Those materials not sent to landfill in the NT are generally sent interstate for processing, recycling or final disposal, from containers for recycling to hazardous materials for safe disposal. The regulation of waste management varies between territories and states, and priorities for developing supporting legislation tend to vary considerably. Western Australia, New South Wales and South Australia (through CDL) are the only states with provision for Extended Producer Responsibility through legislation. Each State or Territory utilises different approaches, appropriate to their context. There is a role for national action on key issues which affect a significant proportion of jurisdictions and may be more effective than jurisdictions regulating.

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

The waste management hierarchy is recognised by the Association as being the best practice model for waste management. It provides waste managers with a simple plan / path for effective and more sustainable waste management. However, this model of waste management is often difficult to achieve for remote underdeveloped communities. In these communities, initiatives that are promoted or imposed by the State/Territory and Australian governments can be uneconomical and difficult to achieve.

Example: Recycling in small remote communities. Recycling is heavily promoted as a minimum effort for integrated waste management services. In remote communities, the cost of collecting and transporting materials to recycling service providers can be much more than any funds received by their return, and environmental impacts associated with transporting goods can detract from environmental benefits of recycling. This would mean the cost of providing a recycling service would need to be met by council taking funds from another service or with an environmental or waste levy being attached to goods. The majority of funding received by local government is allocated to a specific purpose and cannot be reallocated to new initiatives. It would also be difficult to impose a levy in remote communities as many of these communities are facing serious social and economic difficulties, which would be considered a higher priority than externally set waste management targets.

Example: Burning of waste in small and remote communities. The burning of waste is generally considered bad practice, due to the risks to human and environmental health posed by toxins in the smoke. In many remote communities the burning of waste still takes place regularly, as it addresses many waste management problems specific to remote communities. If burning

takes place when wind conditions blow smoke away from populated areas the risk to health is seen by many managers as minimal. After burning, the amount of waste going to landfill is greatly reduced. Less waste mass going to landfill will result in a longer life for the landfill and so will reduce costs associated with selecting and building a new facility. The burning of waste also reduces the risks of putrescibles, causing bad odours or attracting animal and insect pests. This can reduce the risk of disease being spread. Burning also reduces the need for regular covering of waste, further reducing staff and equipment demands. The alternative is the daily / weekly covering and compaction of waste and the more frequent need for a new landfill site. These are demands that resource short councils struggle to meet. Remote area councils would need to be convinced that the benefits of government initiatives are greater than the savings of their current methods.

When new national targets are set for waste management they can bring additional new costs to council when implemented. Strategies for raising funds to undertake the new management methods (which are needed to meet targets) should be included with information sent to councils or with new training. Any shortfall in meeting the costs of new management methods should be paid for by the government / department / agency setting the new targets. If shortfalls in funding are not covered remote councils will continue to only be able to provide basic waste management facilities, unlike high population areas which can provide their communities with new technologies and facilities. They will also continually fail to meet national or state/territory standards.

Work effectively in conjunction with strategic land use planning and other environmental legislation?

Planning consent authority does not sit within the jurisdiction of local government in the NT. This is particularly problematic as there is limited strategic planning for, and integration of, waste management activities into other planning schemes – despite, or possibly because of, the fact that local government remains the key provider of waste management services. As waste management has largely been seen as the domain of Local Government there has been limited strategic land use planning at the territory level, and certainly not from a national level.

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

The commonly held perception that local government is solely responsible for waste management reduces the accountability of waste producers in managing their own waste and in adopting innovative technologies for waste management. State/Territory and the Australian governments are responsible for regulating industry practices including waste management policies and the setting of waste management targets. Voluntary codes of conduct leave it to industry to regulate their own waste management. If industry fails to meet voluntary targets then State/Territory governments may choose to set new targets to rectify the situation or pressure industry into

voluntary compliance. It ultimately falls on local government as the primary waste managers to meet these targets and try to get local industry to comply. It is important that local government is supported in this area.

The Association supports the principle that those who create waste should take full responsibility for that waste. In the case of industry, the Association supports the introduction of legislation, regulations and incentive schemes which will compel the industry to:

- introduce policies which will enable sectors of industry to reach mandatory waste reduction targets within a specified timeframe
- accept 'cradle to the grave' responsibility for the products, waste and litter it produces, at both the production and post consumer stages
- adopt 'closed loop' processes for the products and packaging it creates
- reduce the unnecessary packaging of goods
- use at least a specified percentage of recycled material in their production processes
- use only packaging materials which are capable of being recycled and have a mark as recycled material

The Association strongly supports the introduction of Container Deposit Legislation (CDL) as a litter control mechanism. Container deposits have been introduced in some Northern Territory communities as a local initiative.

Example: Remote Community Container Deposit Scheme. One remote area store in central Australia has introduced its own container deposit system which consists of two major parts. The first is a ten cent refund for all PET plastic bottles returned to the store. This is open to all children and also elderly people who care for children. In this way litter is picked up and the proceeds go to members of the community seen as being in most need of support. The second method is offering children an ice block for every bag of aluminium cans handed in. The store provides the bags and exchanges an ice block for the full bag. These programs have been successful in controlling some litter items. As this is a local initiative there is potential for recyclables to be brought in from neighbouring communities. If this were to become common the store may not be able to afford the cost of the program, so to be successful the container deposit must be applied across the Northern Territory.

In 2005, the Association conducted a survey of the waste collected in one day (one of 2 garbage collection days per week) by the council waste team in a remote Indigenous community. It was found that around 20% of the waste collected on the day would be suitable for a container deposit

(aluminium cans, glass bottles, PET bottles, other containers). If a deposit was claimable on these items, the council could potentially use the funds raised to hire a staff member to sort through the waste as it is disposed at the landfill. The sorter could separate containers with deposits on them and also separate other recyclable materials such as steel cans, paper, cardboard, tyres, car batteries etc. In this way, a container deposit could assist funding wider recycling programs.

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?*

The Association has made the following comment on the objectives highlighted in Consultation Paper Appendix A, from the 1992 National Strategy on ESD.

Objective 19.1: to improve the efficiency of resource use and reduce the impact on the environment of waste disposal

Governments will:

- *seek to develop improved means for providing support for local councils for increased recycling activity including kerbside recycling collections, and planning and operation of landfill disposal sites*

Agreed, noting the fact that recycling capability of local government has significant barriers in remote areas.

- *work towards introduction of pricing and charging structures which adequately reflect the full economic and environmental costs of waste disposal, while assisting the funding of rehabilitation and maintenance of facilities for waste disposal*

Agreed, noting the full economic and environmental costs of waste disposal in remote areas is considerably higher than in other states. This higher cost is compounded by the smaller populations in remote areas and the inability for the community and the public purse to be used to fully accommodate these costs.

- *work to ensure the costs associated with changing waste management practices does not fall disproportionately on industry and local authorities*

Agreed.

- *encourage greater levels of involvement by industry in recycling activities and recognise the contribution already being made by industry in this area*

Agreed. Industry should be involved higher up the chain to improve recyclability of their products.

- *have regard to the principles and recommendations in the National Waste Minimisation and Recycling Strategy and the Industry Commission's report on recycling*

Agreed. Waste avoidance is a high priority in waste management in the Northern Territory.

- *provide further support for the development of whole-life-cycle methodologies and a methodology for full social cost pricing of landfill and waste disposal facilities, taking into account social equity considerations in charges for waste disposal*

Agreed, in that industry should be involved in the whole of a product's life cycle. It is also important to note the social equity considerations in waste disposal in remote communities.

- *develop methodologies for the evaluation and assessment of the costs and benefits of various options for waste minimisation*

Agreed, noting that responsibility for assessment of these costs should be shared and not fall solely on local government. Gathering data in remote communities is challenging, even for local government.

- *develop indicative targets for waste reduction*

Agreed.

- *at the Commonwealth level, continue work on development of a national pollutant inventory*

Agreed, particularly for improving accountability for pollutants.

Objective 19.2: to avoid the generation of hazardous wastes, improve management of those wastes which are generated and improve mechanisms for their clean up

Governments will:

- *assess recommendations on the range of technologies available for the destruction of intractable wastes and decide on the preferred options, and appropriate regulatory and legislative mechanisms for the control of intractable wastes*

Agreed

- *cooperatively work towards early finalisation and adoption of a national approach to regulation of intractable wastes and a memorandum of understanding for their management*

Agreed

- *undertake a siting study to identify a short list of suitable sites for a repository of low-level radioactive wastes*

LGANT has a policy on the disposal of radioactive wastes (7.11e)

(a) LGANT supports the following principles:

1. *siting of a radioactive waste facility in the Northern Territory should not be on the basis of political convenience;*
2. *a site within Australia should be chosen on proper technical and environmental criteria; and*
3. *appropriate community consultation should take place prior to the final decision being made. (Adopted at Executive Meeting October 2005)*

- *have regard to the guidelines for the Assessment and Management of Contaminated Sites*

Agreed, although the extent of contaminated sites in the NT is unclear.

- *through ANZECC 46, give further consideration to the issue of liability for clean-up of contaminated sites, including the issue of generating a public register of contaminated sites.*

Agreed.

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?*

National Approach: Regulatory and economic instruments

The Association believes that the Northern Territory, State and Federal governments should introduce regulatory and economic instruments to reduce litter and reduce the amount of waste going to landfill disposal. Instruments which should be considered include:

- differing taxing or tariffs on virgin material and recycled material
- container Deposit Legislation
- a motor vehicle tyre deposit system
- the use of products with the maximum recycled component
- levies or other price support mechanisms on materials and/or products which are not currently recycled for either economic or practical reasons
- legislation or controls which ban or restrict the quantities or use of materials on the basis of their excessive contribution to the waste stream, non – biodegradability and non – recyclable

National Approach: Coordinating Bodies

The Association supports the establishment of a single coordinating body for each State/Territory to control and direct the disposal of solid waste, coordinated on a Federal level. Such a body should:

- include substantial representation from Local Government as well as representatives of the Environmental Protection Agency, industry, and special interest/community groups
- develop broad waste policies for their jurisdiction for implementation at a regional level. Policies must be flexible enough to allow for local differences and locally consulted.
- develop licence conditions for landfills and other waste disposal facilities
- set industry reduction targets and properly resource compliance monitoring
- assist with the development and implementation of waste education programs
- monitor the effectiveness of waste management policies and programs and seek regular feedback from Local Government.

Local government must be supported in the management of waste if best practice methods are to be implemented in all parts of Australia. The setting of unrealistic and unconsulted national targets will only result in local failure and frustration and could discourage new alternative technologies being devised. Cooperation between waste producers, local government, and peak representative bodies offers planners and managers accessible and experienced partners for the development of more efficient and effective methods to manage the waste we all produce.

National Approach: Extended Producer Responsibility

Extended Producer Responsibility and Product Stewardships Schemes require a revisit of the current situation regarding the management of products/materials throughout their lifecycle. EPR can provide effective tools to advance key outcomes required in achieving sustainable, economic, social and environmental principles. These key outcomes are:

1. Clear, sensible and effective designations of responsibility for the management of lifecycle impacts of products - Extended Producer Responsibility mechanisms have the potential to clarify the responsibilities of key stakeholders. In addition, where a rational assessment process precedes implementation, Extended Producer Responsibility mechanisms can be expected to assign specific responsibilities to those with the best capacity to discharge them;
2. Improved valuation, pricing and incentives mechanisms – Extended Producer Responsibility mechanisms can improve the attractiveness of using recycled material and can generate incentives to design products in order to minimise waste and maximise potential for material or resource recovery;
3. Greater investment in infrastructure and research and development - Extended Producer Responsibility mechanisms can encourage research and development in recycling and resource recovery technology and provide a logical link between expansions in production and expansions in recycling and resource recovery infrastructure; and

4. Greater transparency and accountability - Extended Producer Responsibility can include measures to make producers physically responsible for the products at the end of life and consequently problematic aspects of their products will become direct liabilities for the producers.

These benefits of EPR are likely to be achieved more effectively if such Schemes are implemented at a national level.

National Approach: Waste Industry Training and Research

There is a need for more national support for waste management training, particularly at the vocational and tertiary level. Formalised training opportunities will provide clearer career progression through the industry, encouraging a focus on more technical and high level approach to waste management. In the NT, many local government waste management services are supported through the work of Community Development Employment Program (CDEP) staff, who have little training and no option for career progression. In the national interest of providing employment options for indigenous communities, a clear progression from CDEP to real jobs within local government should be supported by improved vocational training.

Research and support for trials in local use of difficult materials (such as tyres, car bodies etc) in remote areas should be considered on a national level. Local government in the NT is faced with ever increasing costs for transportation to send recyclables interstate for reprocessing and for market. Innovation in the reuse of such materials onsite could substantially reduce these costs.

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

International developments in assessing the energy intensity of production could be harnessed for application here in Australia, not only to address issues of waste management, but also water and energy conservation.

Learning from the more 'producer-focused' models of waste management demonstrated in Europe and Canada could be applied to a national approach to EPR here in Australia. Additionally, many products are produced internationally, and Australia should have a strong environmental stance on EPR applicable to international producers as well.

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?*

Hazardous materials in remote communities remains a significant environmental, social and economic issue for local government, and the broader community in the NT. National standards in the management of hazardous materials need to address the legacy issues in many communities, and it should be remembered that standards that are sufficient for more developed cities and towns in Australia should also be applicable in remote communities. The burden of dealing with hazardous materials that have been disposed of inappropriately in remote communities is too often falling on the (newly formed) shires in the NT, rather than being shouldered by industry, or the government bodies that have been responsible for contractor works in communities.

Although small in population, much of Australia is geographically remote, and current systems for managing hazardous materials is insufficient to address the specific needs of these communities. Aside from greater responsibility placed on the producers of such wastes, research and trials developing technologies and capacities for managing hazardous wastes in remote communities should be supported at a Federal level.

- 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?*

While some national product stewardship programs have had success in the NT, such programs can be limited in remote communities, and vulnerable to market fluctuations and reliance on services provided by external parties (such as private contractors). Access to centralised drop off points is restricted seasonally, with numerous NT communities isolated from road access for 5 months of the year. In this instance, alternative options must be provided for the management of products in the stewardship program during periods of inaccessibility. Schemes must be closely monitored to ensure continuity of service and true accountability of producers and 'stewards'.

The Association strongly supports holding producers accountable in the buy back or drop off scheme, and a more 'start of pipe' approach to waste management, through mechanisms such as Advanced Disposal Fees, deposit / refund schemes, point of sale levies; rather than the current paradigm of 'end of pipe' costing schemes.

Given the national nature of product distribution, the Association Local Government stresses the importance of a national Container Deposit System over state-based schemes, as this will enable greater financial efficiency through consistency in such areas as marketing, labelling and education campaigns and inherently incorporates the economy of scale.

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

As mentioned above, the national distribution of products and materials highlights the need for national standards and regulations on producers and importers. Such standards could include: 'biodegradability' of plastic bags etc; and truth in labelling.

See also Question 2 on National standards.

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?

To understand and provide effective waste management, material flow (supply and demand) needs to be understood. A lack of standardised data does certainly hinder the development of national approaches to waste management. However, the ability of local government in the NT to collect waste information is subject to a range of factors, such as:

- resources,
- remoteness,
- skill levels of staff, and in many cases
- Reliance on an external service provider's cooperation.

It is difficult for waste managers in the NT to gather meaningful data on waste, due to the limited resources available to councils to conduct audits. Many councils operate remote un-staffed facilities in which waste disposal is unsupervised. In addition to this, many users of waste management facilities are not within local government areas and would not be included in any ratepayer or council area resident survey (e.g. pastoral property owners, tour groups). The collection of waste management data may also require the assistance of private waste contractors who operate services for councils. Demanding data and information from private companies can be an additional cost for councils if it is not in the existing contract.

Rather than seek national standardisation of terminology, a more effective solution may be to understand the terminology and how it is used in each state and territory. At a state level, when terminology use has been negotiated and through clear communication between State and Local Government, consensus achieved on terminology use.

In setting national standards for waste data collection, principles to consider include:

- Identify barriers to effective data collection;
- Understand why data is collected;
- Involve stakeholders, particularly at the community level, in discussions regarding data provision;

- Continuity in data gathering, including planning for long term approaches, acknowledging that the data will be less accurate at the beginning of the process, but will improve over time. It is important to compare data in time to measure trends towards and away from sustainable practice;
- Identify what data sets are already available and understand the larger scale data for that information (for example compare definitions, areas covered etc);
- Provide adequate resources for the collection of data, collation of results and analysis.

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

The Association strongly supports a focus on improved design of products, with end of life options at local markets taken into consideration. Products should be favoured if they are more widely recyclable across all states and territories, and if their design, by merit of weight or energy intensity, reduces transport and other costs.

Local government is generally only considered as an end of system stakeholder, with little control on the design, production & transport of materials into their waste stream. A lot of focus on the role of government (local government) in waste management, but not enough focus on industry contribution.

Local government believes that the situation of designing for a 'throwaway' society has gotten to a crucial and dangerous point, whereby the replacement of an entire item, such as a printer or computer, is cheaper than the repair or replacement of some component, like an ink cartridge or battery. This is unacceptable and unnecessary, and industry is not being held accountable for these flaws in marketing and design.

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?

In other states, local government is primarily responsible for the management of municipal solid wastes, and is able to generate funds when other wastes are disposed of at council facilities, however in remote communities the responsibility for all wastes tends to sit with the local government body, including commercial, industrial, hazardous, construction, demolition and anything else.

Municipal Waste Steam (MWS)

The Association calls for a moratorium or ban on packaging goods that contribute disproportionately to the waste stream, through weight, volume or non-recyclability (eg expanded polystyrene packaging, which is not recyclable, contributes significantly in terms of volume). At a

national level it will be possible to set mechanisms in place for local government to have some jurisdiction of MWS inputs, eg through the banning of some items that are considered to be 'unmanageable'. There should be more onus on production industry to reduce their contribution to the waste stream

The use of standardised MSW breakdown, such as those produced by Hyder Consulting, and often quoted in Australian Government documents, is not applicable to many communities in the NT, and should be revisited to reflect a greater diversity in MSW composition across the nation.

Commercial & Industrial (C&I)

As mentioned above, local government in the NT remains the key service provider for commercial and industrial wastes, yet generally receives little to no financial contribution from the sector or elsewhere. The Association calls for a national mechanism to subsidise the management of this waste, with the C&I industry to be held nationally accountable for their wastes. This is particularly important as the C&I industry has little interest in public good, and is more concerned with private costs and profits. Recycling and other public good initiatives tend not to be dealt with by C&I industries in the NT.

Construction & Demolition (C&D)

There is a large amount of public housing in the NT. C&D contractors are generally not held accountable by their respective government agencies to dispose of any wastes appropriately. With the formation of the shires in the NT the full impact of past and present practices of the C&D industry are being revealed, with some devastating outcomes. Small landfilling facilities that could have capacity of several years can be decimated by a single contribution of C&D waste materials. Additionally, the inappropriate management of asbestos materials in communities is increasingly revealing problems of contaminated land.

The Association sees immediate and stringent regulation of the C&D industry as a crucial role of the national waste policy. Currently this (C&D) sector has limited regulation and no responsibility authority assigned to it. These wastes make up a vast majority of the waste stream, yet go virtually unregulated. Local government may not be positioned to take responsibility for these waste streams, nor should it be assumed that they will.

Local government as innovators and market leaders, have been using inert material diverted from landfill in their local activities (such as road construction) and are potentially a major market for this material. In order to continue and guarantee the use of this material, viable and stable markets are needed. In order for these industries to continue to develop and expand, market participants need

some regulatory stability. Unless there is clear identification of roles and responsibilities regarding federal, state and local government and private industry many of the issues for waste management will remain.

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?

The Association has policies in places that support the waste hierarchy which places the disposal of waste as being a final resort to waste management only, however in an example given above (Question 3), the burning of waste is often used as a method of controlling the negative impacts of waste, such as windblown litter, presence of vermin, lack of fill material for cover, reduced landfill capacity, potential for fly bourn disease and general onsite fire management. Safe burn practices are being developed in the NT and improved incineration processes should be considered on a national level as an option in remote areas.

Improved recycling processes and waste avoidance measures should be seen as a primary factor in extending the lifespan of landfills and reducing infrastructure maintenance costs. Local government has concerns on the impact of the CPRS to detract from diversion innovation both in Alternative Waste Technologies and recycling processes.

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 organic wastes?

A change in paradigm of waste as an end product, moving towards the idea of recovering useful resources such as compost will be paramount to successful organic material recovery programs. The benefits of diverting organic materials from landfill are well documented and far reaching including the greenhouse benefits of reduced methane generation, increased capacity of landfill from diverted volume and the reuse of composted materials as a resource. It is important to note however that innovations in methane capture technologies are being explored by some local governments, and these efforts should not be undermined by compulsory targets for organic material diversion.

Figures around the decomposition rates of wastes, including organic materials, and their environmental impacts such as greenhouse gas emissions, are generally developed in more populous regions, and aren't applicable to the wide range of climate that we experience in Australia, even the differences between wet and dry tropics.

The National Waste Policy Taskforce should work very closely with the Department of Climate Change to improve the outcomes of the CPRS with regards to waste. The CPRS in its current state does not encourage innovation in the diversion of organic waste from landfill.

Recognition of diversion of organic waste, and regionally different waste compositions, in the reduction of GHG emissions

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

Due to presence and cumulative effects of materials of concern in electrical & electronic equipment, e waste should be treated as a waste of concern. Options for recovery of electronic wastes from more remote communities should include a focus on buy back and product schemes (as discussed above, Q5 and Q8) and through backloading (transport of goods in delivery vehicles that would ordinarily be returning empty after delivering to communities). A successful program dealing with e-waste should be self funding. The set up of a network of permanent drop-off locations at transfer stations and other well used areas will be necessary.

The Association supports development of partnerships with retailers and IT manufacturers to allow a voluntary 'product stewardship' system to be established. For expediency and greater impact on the e-waste stream, there should be a focus on the collection of big ticket items such as TV's, computers, stereos etc.

Regardless of the program, it is essential to engage local communities to identify potential barriers to the management of e-waste and to ensure a good understanding of the benefits of an e-waste recycling (and re-use) system.

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 Australian Government's climate change policy?

Local government in the NT generally have to transport materials over long distances, this has potential to add to the cost of waste management with the introduction of the CPRS. Improved local infrastructure to manage recyclables directly to market will help to reduce both carbon pollution and the impacts of the CPRS on local government.

It is also important that the benefits of recycling be recognised for contribution to reduction in emissions

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

Improved recycling infrastructure will increase opportunities to reduce water and energy use in waste management. This will also be aided through the phasing out of energy and water intense

packaging through industry. Waste avoidance and waste minimization will provide clear and permanent reductions in water and energy use.

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?

Local government in the NT has little capacity for generation of funds through the rating of properties, even for the delivery of essential services such as waste management. In remote communities, waste management tasks are often undertaken by Community Development Employment Program (CDEP) staff. With the formation of shires in the NT, many of these staff are progressing into real jobs within the shires, however CDEP staffing still forms a large percentage of council budgets in these remote areas. The transition of staff from CDEP to real shire jobs is coupled with improved training of staff and up skilling into areas of waste management and more technical services. The valuable role that local government has in providing jobs on country in remote areas should be recognised nationally and financial support beyond CDEP should be provided to councils to ensure that these opportunities continue into the future.

Improved waste management infrastructure in the NT will further stimulate employment and economic development by internalizing the management of waste and recyclable materials and the provision of local jobs for local people.

Additional Comments

When setting targets or determining best practice it is important that local information is gathered and used. The perceptions and understanding of waste management, its impacts, and waste reduction strategies would vary greatly between residents of a large coastal city (where the majority of Australians live) and, for example, a remote Indigenous community. These differences in perception and understanding could have a significant impact on a waste programs success or failure and so is a very important consideration. Un-researched assumptions on the willingness or ability of people to understand and participate in programs will often result in poor results, once the program is implemented on the ground, and an alienation of communities from government.