Lighting Council Australia

SUBMISSION IN RESPONSE TO CONSULTATION PAPER

A NATIONAL WASTE POLICY: MANAGING WASTE TO 2020

May 2009

Introduction

Lighting Council Australia is the peak body for Australia's lighting industry. The Council represents manufacturers and suppliers of luminaires, control gear, lamps and associated technologies.

Lighting Council Australia is fully committed to environmental responsibility and works closely with Australian and State Government regulators on environmental issues. Examples of environmentally responsible programs undertaken by Australian regulators with the full support and co-operation of Lighting Council include a pilot lamp collection and recycling project in Victoria, introducing minimum energy performance standards for fluorescent lamps and ballasts, introducing a new mandatory standard stipulating maximum mercury content for fluorescent lamps and more recently a program to phase-out inefficient incandescent lamps.

Lighting Council Australia welcomes the Australian Government's intention to develop a national waste policy. Lighting Council has concerns with individual state jurisdictions introducing their own waste management policies. The South Australian Government, for example, has announced an intention to proceed with an Environment Protection (Waste to Resources) Policy which if it proceeds is likely to result in significant unforeseen consequences for the lighting and other electrical industries. It is Lighting Council's expectation that a national waste policy will circumvent implementation of, or replace, state/territory schemes.

Lighting Council Australia is potentially affected by a national waste policy through the supply by its members of mercury-containing lamps and batteries used in emergency luminaires.

The remainder of this submission deals with the questions raised in the Consultation Paper of direct relevance to the lighting industry.

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

Yes. The Environment Protection and Heritage Council, preferably led by the Commonwealth and in consultation with stakeholders, should assume leadership and proceed with the development of a national waste strategy.

Unco-ordinated state and territory waste policies will inevitably result in inefficiencies and unnecessary imposts on industry. In extreme cases they may result in a refusal to supply. In the case of South Australia's announcement that it will unilaterally ban lighting products from landfill, the proposed measure could compromise the Australian Government's phase-out of inefficient lamps, introduced as a greenhouse gas reduction measure. Should the ban on mercury-containing lamps to landfill in South Australia be implemented, the cost of collecting, transporting and recycling the products in a single jurisdiction will be high. This cost will have to be recovered by a substantial increase in the cost of mercury-containing compact fluorescent lamps. This added cost is likely to be sufficient to drive consumers in South Australia to less efficient but cheaper replacement lighting technologies such as mains voltage halogen lamps.

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

No. Lighting Council Australia recommends development of one national framework (including categorisations, definitions and standards) to be implemented within the different levels of government and across jurisdictions.

Do current waste management frameworks across jurisdictions:

- **Deliver an effective regulatory framework?**
  No
- **Provide an appropriate suite of approaches to address waste and resource recovery issues?**
  No
- **Work effectively in conjunction with planning and other environmental legislation?**
  No
- **Provide right incentives to manage materials, products and waste sustainably and holistically?**
  No
- **Need improving, and if so, how could this be done?**

The current waste management frameworks across jurisdictions should be harmonised and streamlined by the Environment Protection and Heritage Council into one effective national waste policy.

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?

Virtually all aspects of an integrated waste policy would benefit from a national approach, including:

- implementation of a sustainable financing system
- execution of efficient collection systems
- operation of recycling plants
- implementation of quality standards
- development of realistic collection and recycling targets

As the question implies, there will need to be local solutions in any national approach to waste, particularly given the concentration of population and resources along Australia's SE coastal fringe. Economically it will not be feasible to organise collection and processing of some end-of-life products from rural and remote communities. In some cases the costs to the environment of collection and transport to recycling facilities will be too high.

Are there waste management initiatives in operation overseas that could apply in the Australian context?

Yes. Lighting Council Australia represents, among others, lamp producers that have successfully implemented collection and recycling schemes worldwide. Should a decision be made to introduce a scheme for the collection and recycling of mercury-containing lamps in Australia, Lighting Council Australia can leverage the extensive expertise of its members over recent years.

Having said this, Lighting Council Australia does not believe in a 'one-size-fits-all' solution, as local conditions should drive any collection and recycling scheme.

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?

Yes. An effective product stewardship legislation should include national quality standards for the environmentally sound collection, transportation and recycling of hazardous waste. Waste collectors and recyclers should be accredited only if they meet required quality standards.

Because of the absence of processing facilities in Australia nickel cadmium batteries currently can only be processed offshore. A national waste policy could investigate whether a processing plant is viable.

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?***

Should a product stewardship arrangement apply in the lighting industry, a national approach would be essential for the reasons outlined above.

A number of models operating overseas, or combinations of models, might work. Further detailed assessment would be necessary before any decisions were made for mercury-containing lamps and for batteries used in emergency lighting.

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

Virtually all aspects of an integrated waste policy would benefit from a national approach, including:

- implementation of a sustainable financing system
- execution of efficient collection systems throughout the national territory
- operation of recycling plants
- implementation of quality standards
- development of realistic collection and recycling targets
- limiting the impact of hazardous substances

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

Lighting Council Australia is willing to discuss with government the required data sets based on the experience of its members in managing working solutions in around 30 countries worldwide. Some of the required information is linked to:

- sales of relevant pieces of lamps sold per year
- estimation of size of waste streams
- geographical distribution of waste stream
- logistics models
- compliance options

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

With regard to lamps, none. Lamp design has virtually no impact on the recycling process and the creation of waste from end-of-life lamps. The creation of waste from end-of-life mercury containing lamps depends on the available recycling technology and not on the design of the lamp. Costs for recycling are independent of the level of mercury contained within.