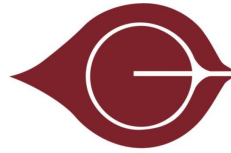


Assistant Secretary
Waste Policy Branch
Department of the Environment,
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Submitted by email:
wastepolicy@environment.gov.au

15th May, 2009

CCSA Submission: National Waste Policy

Dear Sir/Madam,

The Conservation Council of South Australia is pleased to offer comment on the National Waste Policy: Managing Waste to 2020 Consultation Paper.

While CCSA does not have extensive comments to make, we believe there have been a number of successful measures in South Australia which should be applied on a national scale to achieve multiple benefits.

South Australia has a justifiable reputation as a leader in waste management and resource recovery. Our ground-breaking container deposit legislation (CDL) has been a major success story over the last three decades, and it is long overdue for this legislation to roll out nation-wide.

Clearly, in the transition toward a more national approach, it is vital that progress at the state/territory level is not reversed or slowed. Rather, all jurisdictions need to work co-operatively in 'a race to the top'.

CCSA believes consistent principles for waste management are long overdue. A consistent set of definitions and classifications, the introduction of consistent waste levies in all jurisdictions and a common framework for Extended Producer Responsibility (EPR) is vital for wastes that are problematic in their disposal or reflect high amounts of embodied energy.

Tackling problem wastes such as tyres, compact fluorescent lights (CFLs) and e-waste (computers, TVs and other electronics) must be prioritised, especially given the potential for massive increases in these types of wastes as a direct result of government policies (the ban on incandescent light bulbs, the education revolution, stimulus bonus payments, etc).

A consistent national approach to maximising greenhouse gas (GHG) abatement from the waste and recycling sector is also strongly supported. Strategies to minimise GHG emissions from the waste stream should include mandatory gas capture from all significant landfills (over 10,000

tonnes) with mandatory methane gas generation from all major landfills (over 25,000 tonnes).

CCSA is a member of the Boomerang Alliance and endorses its proposal for a National Recycling Initiative (NRI). We hope the government will provide the necessary support for this venture to succeed and to achieve its positive outcomes in a timely manner.

Financial support is also required for other national programs around closing landfills in regional areas, provision of resource recovery and recycling infrastructure and public place collection systems.

There is clearly scope for the development of market-based instruments including taxes, import tariffs and depreciation of assets (as have been mooted in the NRI).

Similarly, there is obviously a role for government to assist in the market development for resource recovery and recycling. Prioritising government support for procurement of recycled products and local re-use of recyclables makes sense, especially in the context of the global economic downturn negatively affecting demand from overseas markets for these products.

The collection, destruction and disposal of hazardous waste is another area of concern for CCSA.

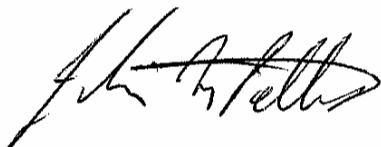
CCSA strongly advocates for complimentary measures to the Government's proposed Carbon Pollution Reduction Scheme (CPRS) to apply to the recycling industry to avoid perverse outcomes.

Finally, CCSA recommends the establishment of a national body, modelled on Zero Waste SA, to overcome the inertia that has bedevilled the waste sector for decades.

This entity, which could be known as Zero Waste Australia, would be charged with implementing national, environmentally-sound and cost-effective policies in the waste minimisation and resource recovery fields in line with the aims of the National ESD strategy.

CCSA appreciates the opportunity to comment on this important issue.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Julie Pettett', written in a cursive style.

Julie Pettett
CEO
Conservation Council of South Australia