



29 July 2009

Waste Policy Taskforce  
Department of the Environment, Water, Heritage and the Arts  
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Dear Sirs,

## **TRANSPACIFIC INDUSTRIES' COMMENTS ON the DRAFT NATIONAL WASTE POLICY FRAMEWORK**

Transpacific Industries Group strongly supports the initiative of updating and streamlining waste management approach at a national level. The National Waste Policy should provide a universal framework in which the waste industry operates and can be used to facilitate the future direction and sustainability of waste management in Australia.

The proposed Draft Framework indicates that the initiative is heading in the right direction, as the current major shortcomings and barriers of sustainable waste management have been touched upon in the document.

The Draft Framework promises leadership at a national level to facilitate collaboration between the jurisdictions. In Transpacific's opinion, this should be one of the main pillars of the strategy; no national targets, national uniformity or national vision can be satisfactorily achieved with the currently separated, self-centred and often poorly cooperating with each other regional and state jurisdictions.

Another main pillar of the success of the new national strategy will be creation of a supportive business environment in which sustainable waste management practices will be encouraged and commercially attractive. This can be achieved by a range of measures including tax breaks, preferential purchasing of recycled content materials, preservation of minimum commodity prices, etc. Without commercial operators that are providing sustainable waste management services, there will be no sustainable waste management. The Draft Framework does not seem to sufficiently strongly address this basic requirement of the future success of the National Waste Policy.

Further comments are as follows:

- Waste reduction targets should be uniform for all Australia therefore can only be a low priority until waste management across Australia becomes uniform. Furthermore, setting of national targets is a good way to encourage national goals, it however carries the risk that more time will be spent on arguing about the target numbers (not even how the number is measured or calculated) rather than getting on with the detailed programs required to reduce waste generation.

- Market arrangements should be concentrating on “source” not “end-of-pipe” policies, such as producer responsibility.
- An explicit commitment and timeframe is needed for national waste definitions and classifications. Uniform definitions and classification of waste are essential to create effective national policy and leadership, provide cost-effective solutions to waste management (particularly hazardous waste), encourage innovation, and enable quantification of any waste related activities (including target setting).
- Commitment, including timeframes, is needed for Organic & C&D waste recycling market development, define nationally accepted standards and agree minimum levels of recyclable content.
- Consistency in licensing and specification requirements across the nation is urgently needed.
- End Point Royalties and Product Stewardship initiatives are vital in order to make changes to the way certain wastes are managed and to reduce the long term environmental impact of those wastes. The Draft Framework does not seem to address this topic sufficiently strongly.
- Landfill legacy emissions need to be addressed at a national level either through the National Waste Policy or the CPRS through providing offsets for improved carbon emissions performance.
- There are no technical/environmental reasons why waste-to-energy plants should be allowed to have different emissions and environmental benchmarks to “waste incinerators”.
- There seems to be no indication of what type of a working group will be involved to oversee this Policy.

Yours faithfully,



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