

22 July 2009



WMAA 
Waste Management Association of Australia

NATIONAL OFFICE:
Suite 4D, Level 4
5 Belmore Street
BURWOOD NSW 2134
T 02 8746 5000
F 02 9701 0199
E enquiries@wmaa.asn.au
W www.wmaa.asn.au

Waste Policy Taskforce
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
CANBERRA ACT 2601

Dear Sir/Madam

Draft National Waste Policy Framework

We have received and reviewed the Draft National Waste Policy Framework – ‘Less Waste More Resources’ and are encouraged by the progress made in developing the draft framework. The Biohazard Waste Industry division of the Waste Management Association of Australia continues to be very supportive of the development of a National Waste Policy, and the direction of the framework document. We appreciate that the framework is the beginning of a process to develop the core components outlined within it and would welcome the opportunity to work with DEWHA to assist in developing strategies specific to the clinical/biohazardous waste stream.

It is evident that many of the issues raised in our submission to do with biohazardous waste are issues common to other waste streams at a high level (definitional, standardisation, risk management), although the detail on how these need to be addressed will be specific to the particular waste stream. Biohazardous waste does not fit easily within the parameters of some of the larger waste streams (both general and hazardous) where diversion, reprocessing and recycling are obviously the key targets, however we believe that the unique nature of the waste streams makes it vitally important to ensure that regulations regarding its handling and disposal are managed consistently on a national basis.

In the context of the National Waste Policy framework we have summarised the key points of our original submission and where they appear to have been commented upon. We would ask that the key points are noted for specific attention as the detail of the National Waste Policy is developed.

1. The lack of consistency in definitions in different jurisdictions, need for a national definition of biohazardous waste.

Addressed in terms of key principles and key theme of ‘Improving the market’. We would stress the importance of developing a national definition for biohazardous waste, as the primary means of addressing current issues and inconsistencies in this sector.

2. A need to ban the landfilling of untreated biohazardous waste

This does not appear to have been specifically addressed but it is noted that within ‘Reducing Hazards’ that there is a desire for processing and infrastructure and capability for hazardous

wastes to be accessible on a national basis. The lack of access to processing technology is often quoted as the reason for landfilling untreated biohazard waste at present. We believe there is adequate access to processing technology across Australia and that this claim should not be permitted as justification for landfilling of untreated biohazard waste, but we welcome the approach of making it easier for cross jurisdictional use of processing capacity, in order to eliminate any perceived concerns in this regard.

3. Streamlining of Government responsibility for the treatment of biohazardous waste.

This is touched upon in terms of both 'improving the market' and 'reducing hazards'. A national approach will highlight and remove the current mix of responsibilities across states for managing biohazard wastes.

4. Little or no enforcement of current management requirements

We would like to see clear penalties and enforcement mechanisms flowing from the national approach to defining rules and responsibilities.

5. Unnecessary risks to the environment and human health resulting from inappropriate biohazardous waste management requirements.

Addressed in terms of 'Reducing Hazards' and the desire to develop an approach for managing substances that links agreed standards or guidelines for appropriate recover, reprocessing and safe disposal.

We would appreciate confirmation that our interpretation of the draft framework and its applicability to biohazardous waste stream is correct and that the intention is for biohazardous waste to be included in the detail of the National Waste Policy that will be derived from the framework document.

Yours sincerely

A handwritten signature in black ink, appearing to be 'L. Falconer', written in a cursive style.

Lincoln Falconer
Chairman
Biohazard Waste Industry