

## Comments

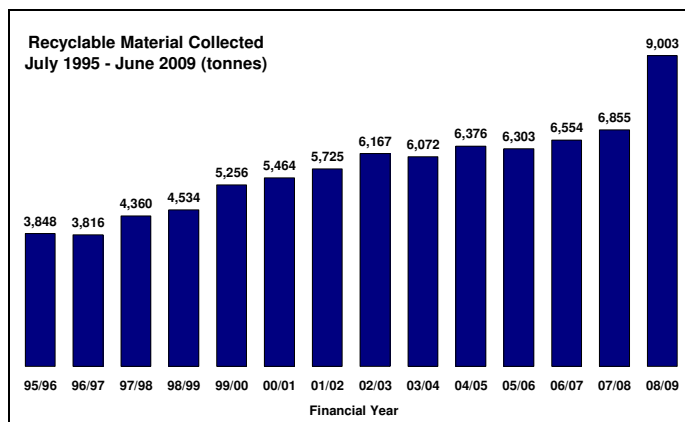
### Aim, Visions and Principles

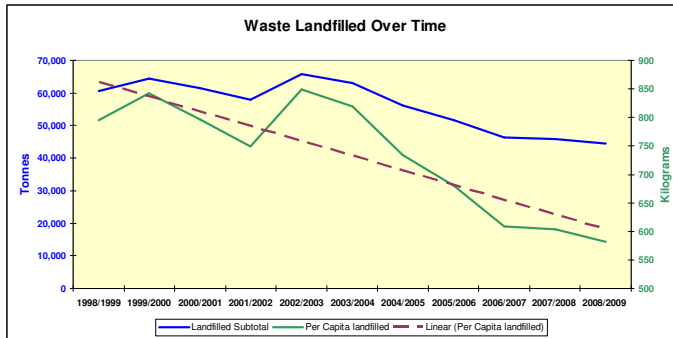
The Discussion Paper contains no commitment to waste education, there is a brief reference to education in the “Key Messages” from earlier consultation yet there is not inclusion into the Framework model. Table 1 states that “Working with community...including awareness raising” is addressed in the Aim, Visions and Principles section yet this is not the case. Education for community, individuals, businesses, government agencies will be essential for every single one of the 10 “Visions” listed and it need to move beyond “awareness raising”.

None of the Visions will be realised without market development, investment, reporting, assigned responsibilities etc, so these themes are all worthwhile.

There needs to be a clearer understanding and unambiguous acknowledgement of the role that effective education will play in achieving the Visions with the same emphasis as market development, investment and reporting. We suggest that another theme and direction: “Effective Education – Beyond Awareness Raising”. At a community level, community acceptance and support for a new waste service are essential to its success - effective education will be critical in achieving this community support or “buy-in”. All the other themes/issues of market, investment, reporting and responsibility will be wasted if effective education hasn’t been considered to ensure the users of the system firstly understand how to use it appropriately, but also support and “own” it, (facilitating individual responsibility). It cannot be a success without this. This of course will be true at many other levels or sectors and issues.

Blue Mountains City Council has achieved a massive reduction in waste landfilled and an increase in materials collected through the kerbside recycling service, this has been attributed directly to the Waste Education program which has been implemented. The Charts included below demonstrate the success of this program.





### 6.5.1 Taking responsibility

Council supports this Key Direction. We believe there are important links between this and Key Direction 5 Reducing Hazards.

### 6.5.2 Improving the market

The directions talks about making consistent the guidelines/standards for storage /stockpiling resources. Also of great value would be national standard requirements or classifications for products made from such resources.

It is often not possible for small scale recycling operations to produce recycled products which conform with the standards required for top grade product. A range of classifications for materials from high grade to lower grades would make recycling in regional areas more viable and would also clarify customer expectations as it would be possible to purchase recycled products from different sources and receive the same standard of materials. Assisting market opportunities for small reprocessing operations will assist the diversion of waste from landfill in rural areas.

Following market creation, stabilisation of these markets is also necessary and we believe that this needs to be a secondary focus of this Key Direction

### 6.5.3 Pursuing Sustainability

This Key Direction is solely focussed on management of organic waste and achieving maximum diversion of organics from landfill. It is recommended that other examples are used in the discussion to show the full scope of this Key Direction.

True sustainability assessments need to consider financial, social and environment factors. The example in the discussion of this Key Direction considers only environmental sustainability within an inflexible framework that is too specific and not robust enough to predict the next (non-organic) “waste crisis” and implement proactive measures. As this is a vision to 2020, (ie 11 years) an ability to focus on changing waste streams is essential to a National Policy.

This also appears top be the best Key Direction to contain a focus on community waste education and communication, which is entirely absent from the document. Local government organisations are the provider of waste services to every domestic premises in the country and educating these customers is imperative to the success of services. We believe that a strong focus on Waste Education and communication must be fundamental to the National Waste Policy.

Organic waste is largest part of the domestic stream but not of all waste streams. The framework also does not appear to be easily related to reduction strategies for C&I or C&D waste streams.

The principle of diverting organic waste from landfill to reduce greenhouse liability is an excellent management strategy for medium to large urban areas, however, we consider landfill to be the primary option for disposal of much organic waste in regional and remote areas where landfill alternatives are not viable due to:

- low waste throughput which cannot support a new AWT type facility, and
- long haulage distances from source of waste to existing facilities out of the area making this solution financially unviable for small and rural local councils and defeating any gains through the impact of the vehicles.

This may result in the marginalisation of operators in regional and rural areas as they are forced by a lack of resources and market opportunities into selecting waste disposal systems which will always be classed as sub-standard. Circumstances such as these clearly prevent operators in marginal areas from satisfying the aims of this Key Direction if it has only this purpose.

The diversion of organic waste from landfill is also highly dependent on Key Direction 6.5.2 and 6.5.4 as a lack of markets for end products (and investment therein) will result in these materials being landfilled. Even following active market development projects it is not guaranteed that equivalent markets will exist in all regions, successful markets opportunities in urban areas may not be possible in rural areas.

It is likely that technologies such as bioreactor landfills will prove to be sustainable options for regional and rural communities in arid and desert areas. A well managed bioreactor landfill in arid regions is cost effective waste disposal for regional and rural communities, poses minimal risk to the environment where there are deep water tables and high evapo-transpiration rates and will be effectively operated by a population who are able to rely on proven technology until small scale AWT is viable for these communities, (it is possible that this is still decades away).

#### **6.5.4 Facilitating Investment**

Council supports this Key Direction.

#### **6.5.5 Reducing hazards**

Council supports this Key Direction.

#### **6.5.6 Reporting on performance**

Council supports this Key Direction.

#### **6.5.7 Tailoring solutions**

The Key Direction focussing on tailoring solutions appears to be singularly focused on very small communities in remote or outback locations. The discussion paper appears to encourage a standard best practice across the industry with exceptions only made for extremely remote areas or aboriginal communities. There can be wide range of physical and economic environments for waste service providers and operators, which can result in vastly different market opportunities and levels of viability for particular waste technologies. This may apply even to large regional populations in different climatic zones or areas of different primary industries.

Tailoring solutions may also apply in different urban areas, this Key Direction does not acknowledge that there are urban populations (sometimes in the same city) which also face particular challenges in waste management and resource recovery programs.

For example the C&D waste stream in inner city areas (with predominant renovation and high rise construction activities) is vastly different from urban fringe type

development (brown field suburban development) and similar resource recovery strategies will not be possible for operators.

Many regional urban populations also do not have the required financial capacity to satisfy the implied requirements of Key Direction 3.

Council considers the discussion regarding this Key Direction to be too specific and narrow to support resource recovery strategies for many sectors of the waste services industry.