

**Draft National Waste Policy Framework**  
**Less waste more resources**  
**Discussion Paper**

**Submission in response by Standards Australia**  
July 2009

**Purpose**

Standards Australia would like the opportunity to work with the Department of the Environment, Water, Heritage and the Arts (DEWHA) and the Environment Protection and Heritage Council (EPHC) in the implementation of the National Waste Policy. Standards Australia is positioned to provide customised solutions that provide real and tangible outcomes that will benefit the environment, the community and the national as a whole.

Standards Australia represents the interests of all individuals, community groups, businesses, industry, government and all relevant stakeholders. Australian Standards set out specifications and procedures to ensure goods and services consistently perform in the way they are intended. They make a sustained contribution to generating national wealth, improving our quality of life, increasing employment, improving safety and health and using our national resources more efficiently and sustainably.

The purpose of this document is to reinforce Standards Australia as the right and obvious choice to take on this project with the EPHC in a collaborative manner as part of the solution to meet Australia's waste management challenges going forward.

**Issues**

To further elaborate on how Australian Standards can assist the EPHC and the Department achieve its goals and objectives the issues identified in the discussion paper are addressed below.

National Policy

Australian Standards are efficient and effective. They are developed by Government, business, the community and other relevant stakeholders. In this way, Australian Standards are developed '*by the people for the people*'. Standards Australia has the experience at managing and implementing initiatives such as this.

Standards Australia currently has a number of collaborative relationships and projects, examples of which include:

- The Department of Health and Ageing (DoHA) – Health Informatics (IT14);
- Department of Environment, Water, Heritage and the Arts (DEWHA) – Energy efficiency standards; and
- The South Australian Government – Environmental Protection Authority (EPA) – Greywater treatment for river vessels.

Vision and Scope

An integrated National Waste Policy requires synchronicity across states, territories, local governments and the industry to be effective. It is the basic role of Australian Standards to provide guidance material, whether that is in the form of low-consensus documentation or legislation, that is fit-for-purpose with clearly defined, standardised approaches.

Targets

A harmonised, integrated approach is required to measure performance. Australian Standards are a vehicle that provide a clear vision and can contain objectives and targets to enable jurisdictions and industry to drive change.

The discussion paper asks that given that the National Waste Policy will set priorities for the next decade, how will such targets be derived? Australian Standards are developed by expert committees that are comprised of interested and relevant stakeholders. It would be the onus of the Committee to set these targets on behalf of industry and the community. There is of course, the flexibility with Australian Standards to modify these goals to reflect the particular desires of specific states and communities.

### Market Arrangements

End-of-pipe solutions can be expensive for industry and the community. The costs of waste levies applied by a state or territory, a landfill gate fee applied by the operator for commercial waste and rates paid by the community to the local council for disposal and recycling of domestic waste can add up quickly.

Standards Australia notes that there are currently no clear market signals to influence creation or management of waste. Australian Standards have the capacity manage this process with respect to product design, the hazardous content of materials and components, efficacy of manufacturing processes, packaging, transport and end-of-life disposal.

### Maximising Benefit

Reducing overall waste production and managing waste as a resource provides an opportunity to innovate and develop new processes, technologies, industries and markets, bringing associated growth in employment and the economy.

Today innovation is understood to involve much more than the transmission of knowledge down the pipeline of production from research to development to application. In the age of the internet, with the opportunities for collaboration which it opens up, open innovation is increasingly important.

- Standards are part of the innovation system in that they contribute to the diffusion of useful knowledge.
- Standards compliment the innovation that flows from R&D and may even substitute for it by diffusing knowledge through and between businesses.
- Standards contribute to productivity. For example, standards can lower production costs by efficiently spreading through the organisation ideas on process innovations like risk management, quality management, earned value and so on.
- Performance-based standards encourage innovation in specification.
- National standards facilitate harmonised regulation.
- Standards assist innovation in new industries, building and construction, electronics, management and other industries.
- Standards development is a driver of productivity and competitiveness within forms and industries and a keys means of supporting the diffusion and take up of new technologies and innovative processes across industries and the community.

The National Waste Policy can also contribute to green house gas reductions, water security and quality and the productivity of our horticultural crops and agricultural land.

### Product Stewardship

It is the role of everyone, including industry, government, stakeholders and the community to reinforce the role of product stewardship and take up responsibility to reduce the environmental impact of a product. For manufacturers, this includes planning for, and if necessary, paying for the recycling or disposal of the product at the end of its useful life. This may be achieved, in part, by redesigning products to use fewer harmful substances,

to be more durable, reuseable and recycleable, and to make products from recycled materials. For retailers and consumers, this means taking an active role in ensuring the proper disposal or recycling of an end-of-life product.

Standards Australia has experience in this field as demonstrated in the table below.

Standards Australia has the expertise to develop Australian Standards for priority products, particularly for electronic waste such as computers and televisions as well as for end-of-life tyres, batteries, mercury containing lamps and whitegoods which have been supported through the public consultation process.

Australian Standards and low-consensus documentation are flexible enough to encompass a range of approaches being voluntary, co-regulatory and regulatory. Such documentation provides the perfect safety net and minimum performance guidelines for such a scheme.

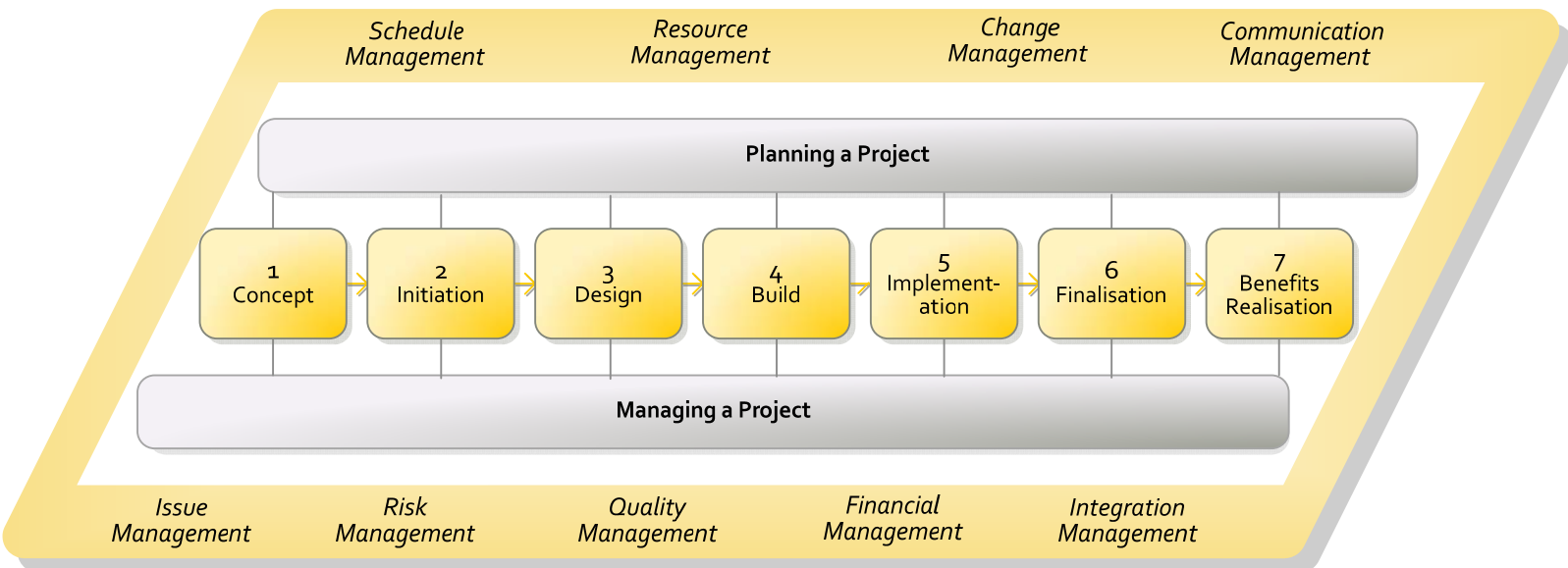
### Legacy Emissions

Standards Australia does not have a comment on legacy emissions.

### **Standards Australia Project Management Methodology**

Standards Australia has developed and implemented a methodology to manage all standards development projects. This provides a common framework, tools and templates within which all projects will developed. The SP<sup>3</sup> process has seven distinct phases, each with specified milestones for delivery which are tracked throughout the lifecycle as detailed below.

*Diagram 1: The Seven Phases of SP<sup>3</sup> Development*



An integral benefit of this new methodology is the level of control that it brings to all development projects through the introduction of status reporting, issue and risks management and change management.

### Proposal Submission and Evaluation

The Project Proposal is submitted to the Standards Australia Customer Information Service (CIS) for registration.

A Project Proposal is required to be completed and submitted to Standards Australia for approval. Part of the Project Proposal requires that relevant stakeholders are consulted to determine if there is wide support for the proposed Australian Standard/ TS or Handbook.

A Project Proposal requires information on the following:

- Scope of Proposal
- Avoidance of Duplication – Including International Standards
- Strategic Priorities
- Contractual Obligations for Standards Australia
- Preferred Pathway for Development
- Stakeholder Support
- Risks and Opportunities
- Post Implementation Review
- Purpose and Demonstration of Net Benefit

Part of the Project Proposal is the development of the Net Benefit case. This is where the proponent articulates the way the proposed standard will benefit the Australian community against the following criteria:

- Public health and safety;
- Social and community impact;
- Environmental impact;
- Competition; and
- Economic impact.

As part of Standards Australia's obligations as peak national standard's body and under the Memorandum of Understanding with the Commonwealth, all projects must demonstrate a positive Net Benefit to the community as a whole.

Net Benefit is a core component of how Standards Australia operates.

For simplicity and to align the Productivity Commission's recommendations with the [Accreditation Board for Standards Development Organisations](#) (ABSDO's) requirements, Standards Australia has defined Net Benefit to mean *"having an overall positive impact on relevant communities"*.

These measures align with Australian Government Office of Best Practice Regulation (OBPR) and provide a level playing field for all proposals for Standards development projects.

### Proposal Approval

Once the Proposal has passed evaluation it is forwarded to the Production Management Group (PMG) for final consideration and approval. The PMG approves/rejects the proposal thereby endorsing the pathway, net benefit, resource availability as well as prioritisation of the project/program.

### **Conclusion**

Standards Australia supports DEWHA and the Environment Protection and Heritage Council in developing a national waste policy that will identify best practice in waste management and resource recovery.

Standardisation is a process that assists in the removal of inefficiencies and duplication across jurisdictions. Standards Australia, as the nation's peak non-government standards development body, has a very important role to play in the development of Australian Standards as an important component of a harmonised regulatory approach.

Standards Australia would welcome increased engagement with the relevant Government agencies and industry stakeholders to maximise the benefits which may be gained from development and utilisation of relevant and effective Australian Standards in waste management strategies for the community at large.