

31 July 2009

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

Via email: [wastepolicy@environment.gov.au](mailto:wastepolicy@environment.gov.au)

-----  
Submission on Discussion paper

DRAFT NATIONAL WASTE POLICY FRAMEWORK: Less waste more resource  
-----

#### PREAMBLE

1. SITA Environmental Solutions (SITA) supports the Federal Government in its endeavours to develop a national platform that clearly articulates the mechanism by which governments at all levels support the twin objectives of minimising waste generation while maximising the recovery of valuable resources inherent in the collected waste material streams.

#### SUBMISSIONS

2. The generic term 'waste' comprises a myriad of material streams – most of these material streams are valuable resources that can be appropriately recycled and/ or processed into recovered products. The use of the term 'waste' – and other similar generic terms such as rubbish, garbage, and refuse – when referring to recycling and resource recovery activities and associated markets, sends the wrong message as they are negative terms with negative connotations. Governments at all levels should remove these negative terms and replace them, where appropriate, with terminology that reflects the true worth of these materials streams. For example, feedstocks and material streams for inputs; and, products and recovered resources for the outputs.
3. National waste diversion targets must be developed to help drive government decision-making timetables – these targets should be mandatory.
4. Reduction of greenhouse gases must be a guiding principle in developing the framework both directly and indirectly.
5. Clear, unambiguous enunciation of the NWP vision into a concise statement must be developed – the 10 dot point 'visions' are outcomes.
6. The outcome relating to water and energy efficiency should be to increase the efficiency of water and energy utilisation.
7. The activities of government must be to support waste avoidance and resource recovery rather than facilitate.

8. Allocation of responsibilities between government levels must be an outcome of the framework.
9. Increased use of market-based instruments to drive reform in the industry must be supported – if a policy vacuum exists here, the framework must identify and direct their implementation.
10. A further outcome of the NWP is to insist that the decision-making process by all levels of government is based on the triple-bottom line platform of social, environmental and economic cost-accounting – this is crucial when considering procurement of technology for the recovery of resources.
11. SITA believes the seven high level themes (directions) identified are correct in their breadth of market, social and environmental coverage.
12. In 'Taking responsibility', the Government must support community and business endeavours to separate at source the different categories of material streams that comprise the generic classifications of Municipal, Commercial & Industrial and Construction & Demolition. 'Separation at Source', in large population centres, must be considered alongside 'Product Stewardship' and 'Extended Producer Responsibility' as a tripartite approach underpinning the framework of responsible management of the inherent resources.
13. In 'Facilitating investment', the NWP framework must direct government procurement policies towards those recovered/ recycled products that support ecologically sustainable development.
14. In both 'Facilitating investment' and 'Tailoring solutions', the hypothecation of funds raised from 'waste' levies be towards investment in infrastructure at the local government level, state-based waste development strategies and associated government services. This ensures that residents and waste generators receive the benefits of higher costs.
15. SITA agrees to the need for a nationally agreed system of classifications and regulations across all government jurisdictions, and harmonisation with international regulations associated with hazardous wastes. This will significantly reduce regulatory barriers towards improved management practices.
16. Specifically, there continues to be a lack of uniformity in the standard of operation of landfills throughout Australia, particularly between rural and urban areas, which undermines the credibility of this disposal option. More importantly, it creates a competitive disadvantage for those operators that employ best management practices.
17. Likewise, regulatory differences between jurisdictions for resource recovery solutions must be harmonised to reduce 'free riders' taking advantage of arbitrage opportunities.
18. Finally, the NWP framework should support national initiatives such as CDL to improve the value of recycled/ recovered products. This holds especially true for recycled organics products destined for land application.