WASTE MANAGEMENT ASSOCIATION OF AUSTRALIA

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FAO:
Waste Policy Taskforce
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Dear Sirs,

Draft National Waste Policy Framework

Thankyou for the opportunity to comment on the Draft National Waste Policy Framework. We are writing on behalf of the WMAA NSW Landfill Working Group (LWG) comprising private companies, local government, consultants and academics operating in this sector.

General comments:

We encourage the Government in a continued and strengthened focus in the area of removing recyclables and other materials at source. End of pipe approaches are important but not as critical as preventing waste generation in the first place. Landfill levy's and waste diversion are blunt instruments if they do not address the energy balance and lifecycle costs of these end of pipe solutions in a rigorous and scientific way.

It is a fact that modern landfills can and do provide critical infrastructure to meet the waste management needs of the Australian people. Landfills have a long term place in waste management policy to provide cost effective disposal for residuals and in remote areas where resource recovery as a primary method is not possible.

Many improvements have been made to landfill design over recent years, for example in bioreactor technology. The WMAA National Landfill Division has taken a significant lead in this area commissioning a review of Bioreactor Technology and this important document is due for release in August 2009. These types of developments should be adequately recognised in any review of National Policy.

The efficiency of mechanical biological processing (MBT) in relation to diversion from landfill can be highly variable and landfills are typically employed in the disposal of residual components. These can represent a significant volume of waste which is often overlooked in the analysis of volume flows and should be considered in the Policy review. It is the

experience of both Australian and European operators of MBT that considerable (sometimes up to 50%) of residual material can remain after processing.

Rather than landfilling resources high in embodied energy we strongly encourage the Government to prioritise the reuse of eg. plastic residues from mechanical processing of Commercial and Industrial, and other mixed 'kerbside' wastes. These mixed plastic wastes are commonly landfilled where it is difficult to generate a clean material suitable for recycling. The dirtier these streams are the lower the market value is. The landfilling of these types of waste streams are a waste of resources, and thermal processing to recover energy is an area that should be encouraged where processing is considered too difficult.

In Europe these waste streams are commonly used for alternate fuels and energy recovery. This has been traditionally unpopular in Australia due to the 'incineration' association, but improvements in technology, particularly emissions control and the need for alternate energy source mean that this should be a critical assessment area for the Government in considering its National Waste Policy.

The NSW LWG support appropriate recognition for the recovery of landfill gas for baseload energy generation from waste. Landfills wherever possible should include the provision of gas collection infrastructure to enable recovery of the recycled organics in the form of methane gas. Price signals should be encouraged for those operators who collect landfill gas and effectively convert organics into electricity. Landfills operating to a higher standard of performance have a justified claim to lower landfill levy imposts, especially where landfill levies are being applied to capture externalities. The removal of methane gas from waste is mass that is removed and that should be recognised in lower landfill levy impost.

Specific Comments:

6.3 We fully support these focus areas particularly in the reduction of waste at source

6.4 (2) This should include lifecycle criteria in addition to other environmental outcomes such as greenhouse gas emissions. Without this level of assessment the true outcomes are not transparent.

6.5.2 Improving the market
We support this direction and agree it is critical to drive the re-use of materials. Of great value would be national standard requirements or classifications for products made from such recycled resources.

6.5.3 Pursuing Sustainability
We do not support banning organics from landfills when there are proven and cost effective ways of capturing methane and using it to generate renewable electricity. This Key Direction is solely focussed on management of organic waste and achieving maximum diversion of organics from landfill. There is no mention of encouraging the energy production from landfill and the benefits this provides. Whilst we do not discourage the re-use of organics for the best environmental outcomes possible it should be clearly understood that the use of organics in generating fertiliser / soil improvement products is difficult (when derived from mixed 'municipal' waste streams). There are currently no standards in NSW for the application of these materials to land.

True sustainability assessments need to consider financial, social and environment factors. The example in the discussion of this Key Direction considers only environmental sustainability which may be too specific and not robust enough to predict the next (non-organic) waste challenge and to allow implementation of proactive measures in other areas. As this is a vision to 2020, (ie 11 years) an ability to focus on changing waste streams is essential to a National Policy.

Organic waste is largest part of the domestic stream but is a relatively small part of the total waste streams. The framework should focus equally upon reduction strategies for C&I or C&D waste streams. It is here that the largest gains may be possible.

In rural areas, the principle of diverting organic waste from landfill to reduce greenhouse liability can be a reasonable management strategy for medium to large urban areas, however landfill is commonly the primary option for disposal of much organic waste in regional and remote areas where alternatives are not viable due to:

- low waste throughput which cannot support higher cost AWT type facilities 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.

This may result in difficulty for operators in marginal areas to satisfy the aims of this Key Direction if it has only the purpose of removing organics.

The diversion of organic waste from landfill is also highly dependent on key direction 6.5.2 and 6.5.4, and a lack of markets for end products (and investment therein) may result in these materials being landfilled. Even following active market development it is not guaranteed (indeed it may be unlikely in the timescales considered) that adequate markets will exist in all regions. Successful market opportunities in urban areas may not even be sustainable in more rural areas.

Technologies such as regional bioreactor landfills may be the most sustainable options for rural communities. A well managed bioreactor landfill may represent cost effective waste disposal for regional and rural communities, pose minimal risk to the environment, recover surprisingly high energy yields, and will be effectively operated by a population who are able to rely on proven technology.

6.5.4 Facilitating Investment
The encouragement of recycled goods by government procurement and licencing policies is encouraged.

6.5.5 Reducing hazards
No Comment

6.5.6 Reporting on performance
No Comment

6.5.7 Tailoring solutions
The 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 an extremely 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 to large regional populations in different climatic zones or areas of different primary industries.

The need for different 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 difference 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.

The NSW LWG fully supports the Department of Environment Water Heritage and the Arts in its review of National Waste Policy and appreciates the opportunity to comment. We hope our comments are helpful, and constructive.

Yours faithfully

Shaun Rainford

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