



SUBMISSION TO
THE DEPARTMENT OF THE ENVIRONMENT, WATER, HERITAGE AND THE ARTS
ON THE DISCUSSION PAPER ENTITLED:

*DRAFT NATIONAL WASTE POLICY FRAMEWORK –
LESS WASTE MORE RESOURCES*

Background

The Winemakers' Federation of Australia (WFA) welcomes the opportunity to comment on the discussion paper *National Draft Waste Policy Framework – Less Waste More Resources*.

The WFA is the peak national body representing wine enterprises of all sizes across Australia. Our membership represents in excess of 90% of wine production in Australia and, together with State Wine Industry Association members, more than 80% of wine businesses.

It is recognised that the processes involved with the production of wine result in the production of wastes. This includes gaseous, liquid and solid wastes emanating as a result of vineyard activities, winery production, packaging and distribution. The major waste streams for the wine industry include;

- Green waste, treated posts and chemical waste in vineyards.
- By-products of winemaking (grape mark, filter material, stalks, lees and gases), chemicals and wastewater in wineries.
- Glass, cardboard and plastics in packaging

The wine industry places great importance on waste management and has developed various means of dealing with the issue.

EntWine Australia is the wine industry's national voluntary environmental assurance scheme. The scheme has been developed as a means of uniting the industry under one national scheme, which provides operators with an environmental code of conduct for wineries and vineyards. These environmental codes of conduct feature waste as a major issue with sections on solid waste, wastewater, chemical management and gas emissions. The codes require participants to develop waste management plans and encourage the consideration of other industry best practice.

Under the scheme, producers will be required to submit a scope 1 and 2 carbon footprint to the WFA, report against a set of national indicators and gain certification to the EntWine Australia default certification scheme or an equivalent scheme.

The indicator reports will show usage of some important industry indicators, such as fuel, energy, water, fertilisers and waste. These indicators will be used to provide national averages for the industry which could be used as a form of benchmarking against previous years. The scope 1 and 2 carbon footprint information will be used in much the same manner. Producers can submit their details by using the Australian Wine Carbon Calculator (produced as part of the EntWine Australia scheme) or similar online carbon accounting tools.

Operators will also need to become certified to the EntWine Australia default certification scheme or equivalent. The certification will be audited by a third party in order to assure a high standard of environmental assurance.

It is hoped that the broad uptake of EntWine Australia will result in improved environmental management within the industry and a more integrated approach to caring for the environment. Entwine Australia is currently under development and is due to be launched in August 2009. This scheme was partially funded through WFA and the Australian Government's Caring for our Country.

The wine industry also supports the National Packaging Covenant, which aims to minimise the environmental impacts arising from the disposal of used packaging, conserve resources through better design and production processes and facilitate the re-use and recycling of used packaging materials. The core purpose of the NPC is to assist industry to reduce the amount of packaging waste going to landfill using the principle of 'product stewardship'; that is, taking responsibility for the life cycle of the packaging from design to disposal.

The adoption of programs such as ChemClear and drumMUSTER has become common practice within the wine industry. These programs are supported by government and industry and assist operators with the safe removal and recycling of unused chemicals and chemical containers.

The recycling of solid waste is an industry-wide practice that many operators have adopted. Recycling of grape mark and other green waste, as mulch, compost or livestock feed, also is common, as are wastewater treatment and recycling in most wine industry operations. The EntWine Australia scheme seeks to support and further these practices.

National Waste Policy Framework

In general, the WFA supports the aims of the *Draft National Waste Policy Framework* and many of the issues it raises are already being addressed within the industry. However, as in other industries it will be difficult to totally “avoid the generation of waste”. Where reductions of waste outputs are unachievable, it is acceptable to expect the recycling or reuse of such wastes.

6.5.1 Taking Responsibility

The Australian wine industry acknowledges the importance of taking responsibility for waste management and the role of the industry. This theme relates closely to the National Packaging Covenant, which encourages responsibility for the entire cycle of waste production as well as product stewardship. While adoption of the covenant is voluntary, many wine industry operators are involved.

The EntWine Australia scheme is a prime example of an industry initiative that has been developed to drive environmental benefit. It is hoped that the scheme will provide the industry with a basis for taking responsibly for its waste management and other environmental issues.

6.5.2 Improving the Market

The WFA acknowledges the importance of improving the market as a key theme of the framework. The classification and regulation of wastes that are used as resources and the innovation and investment in such resources is of great importance. It is common practice for operators to reuse or recycle various forms of organic waste as fertilisers or soil conditioners. Such resources are often stockpiled. The EntWine Australia scheme will seek to provide consistent standards for safe and acceptable storage and stockpiling.

Innovation and improvement in technology are also of particular importance and areas such as the development of gaseous waste within the wine industry will require significant investment. Methane is a common waste product produced in the winemaking process, and its effects are still relatively unclear. As a result of the increased interest in climate change and the introduction of the Carbon Pollution Reduction Scheme, further investment, research and innovation in this area will be crucial.

6.5.3 Pursuing Sustainability

Pursuing sustainability is a central theme of the waste policy framework. However it will be important to ensure consistency and collaboration with existing programs. In particular there is overlap with the National Packaging Covenant. Many aspects within the ‘pursuing sustainability’ theme are already being implemented with regards to consideration of whole-of-life impacts.

6.5.5 Reducing Hazards

While the reduction of hazardous waste within the wine industry has been greatly improved with such collaborative initiatives as ChemClear and drumMUSTER, there are still opportunities for further initiatives.

An issue arising from the key themes of the draft policy framework for the wine industry centres on the reduction of hazards. This relates to the removal and disposal of hazardous wastes. While the wine industry is currently investigating alternatives to the production and use of hazardous substances, the broad adoption of such technologies is not expected to be easily achieved due to the significant costs involved. There is currently a lack of appropriate infrastructure for the disposal of this waste and, as such, operators are being forced to stockpile waste onsite. The key theme of reducing hazards is important for the wine industry. Taking into account the current economic climate and state of the industry, it is recommended that a co-operative approach to investment in infrastructure be adopted. The WFA supports any initiative made by government to assist industry with the removal of stockpiled wastes. A co-operative approach needs to be taken as the industry will not be able to address these issues without government funding and support. Further programs aimed at assisting industry with waste management should be developed in a collaborative approach to managing waste (including hazardous waste).

Further innovation in the use of alternate substances or technologies that would assist industry to reduce hazards would be of great benefit.

6.5.6 Reporting on Performance

The WFA supports the theme of reporting on performance as there is little value in the framework if effectiveness and progress cannot be tracked and reported. EntWine Australia will provide a means for industry to highlight their environmental responsibility. With the reporting of EntWine Australia indicators and scope 1 and 2 carbon footprints, the industry will be able to track its performance and provide a clear view of the industry as a whole.

6.5.7 Tailoring Solutions

It is vital that the rural regional divide be acknowledged within the waste policy framework. There is a vast difference in the quality of, and access to, appropriate waste disposal facilities. This has resulted in exorbitant charges and expenses associated with the removal of waste from rural areas. Improved or subsidised access to waste removal facilities should be provided under the government's national waste policy framework.

The WFA supports this theme but feels that the divide between rural and regional areas needs to be clarified. Further efforts need to be made to assist rural communities with waste disposal.

Conclusion

In principle the WFA supports the development of a *National Waste Policy Framework*. The general aims and vision appear appropriate for achieving the desired outcomes of the national waste policy. The key themes have been well thought out and cover a broad range of relevant issues.

The WFA would like to stress the importance of collaborative investment and innovation from government and industry. Further investment and assistance from government will be required to assist industry in conforming to the national waste policy.

The Australian wine industry is currently working towards improving its waste management through schemes such as EntWine Australia, the National Packaging Covenant, drumMUSTER, ChemClear and various recycling programs. It is hoped that, through this work and continued collaboration with government, the industry can take steps towards improving its environmental management.