

31 July 2009

Waste Policy task Force

Department of the Environment, Water, Heritage and the Arts

GPO Box 787

CANBERRA ACT 2601

e-mail: [wastepolicy@environment.gov.au](mailto:wastepolicy@environment.gov.au)

Dear Sir/Madam

**Re: Adelaide Hills Region Waste Management Authority submission on the discussion paper "Draft National Waste Policy Framework – Less waste more resources."**

The Adelaide Hills Region Waste Management Authority (AHRWMA) is a regional subsidiary pursuant to the South Australian Local Government Act 1999 and is comprised of four member Councils, being Adelaide Hills Council, District Council of Mount Barker, Rural City of Murray Bridge and Alexandrina Council.

AHRWMA operates a landfill which is utilised by its Member Councils and other customers, but also provides waste management expertise and staff to Member Council's. Operating within the waste industry but also within local government, the AHRWMA appreciates the ability to provide comment on the above mentioned discussion paper.

The development of a National Waste Policy based upon draft policy framework is welcomed. National consistency in the waste management sector is required if all states of Australia are to equally contribute towards overcoming the existing challenges as identified in the discussion paper.

Please find attached the AHRWMA's comments for your consideration. Your feedback and advice of any revisions to be made to the discussion paper or final Policy document will be appreciated. Should you have any further queries, please do not hesitate to contact Thomas Gallasch on 0400 469 955 or via e-mail, [thomas.gallasch@ahrwma.com](mailto:thomas.gallasch@ahrwma.com)

Yours Sincerely,



Michael Lorenz,  
Executive Officer, AHRWMA

PO Box 54 Mount Barker SA 5251 • 0417822319 • [m.lorenz@ahrwma.com](mailto:m.lorenz@ahrwma.com)

ADELAIDE HILLS REGION WASTE MANAGEMENT AUTHORITY

## **Draft National Waste Policy Framework – Less waste more resources”**

### **Adelaide Hills region Waste Management Authority Comments**

The AHRWMA supports the clear intentions of the discussion paper which are to:

- Reduce the amount of waste for disposal;
- Manage waste as a resource for better environmental, economic and community outcomes;
- Apply stewardship approaches to enhance resource recovery;
- Drive innovation in waste minimisation;
- Dispose of necessary waste in a safe and environmentally sound manner;
- Are aware of the environmental consequences of their consumption choices.

However, to ensure these objectives are met a number of key principles are established supported by seven themes and directions.

#### **1. Taking Responsibility (section 6.5.1)**

This section principally relates to product stewardship and/or extended producer responsibility schemes. AHRWMA supports mechanisms of this nature which place responsibility for end of life product management onto manufacturers, suppliers and also the community. In South Australia the best example of this is the highly successful container deposit legislation (CDL) programme. This has reduced litter and improved recycling rates of beverage containers as consumers receive a refund of a 10 cent deposit per item when it is returned to a collection depot.

Market based mechanisms such as including the cost of recycling and disposal in the sale price of products could also be applied to a wide variety of waste streams, including e-waste and compact fluorescent lamps (CFL's). However, to achieve these national objectives, they must be deployed nationally. This would ensure national markets would remain equitable and would also generate the required economies of scale to bring down the cost of recycling of the items in question.

It is clear that new services will be required in order to ensure the majority of the population will have the ability to participate. Using South Australia's CDL example, depots are present in both rural and metropolitan areas at no cost to the consumer. Accessibility of any proposed scheme will have to be considered in this context, as for example if the consumer pays upfront in the purchase price for an item to be recycled at the end of its life, the consumer should be able to easily deposit the item at no cost at a convenient location for it to be recycled.

However, Local Government is often placed into a position where it is expected to provide these solutions at its own cost. The disposal and recycling of e-waste and CFL's is something industry should be championing nationally as individual solutions developed by the 100's of local councils across Australia do not achieve a uniform solution and it also absolves the manufacturers and distributors of any end of life responsibilities.

In South Australia the Environment Protection Authority (EPA) is proposing to implement a new Waste to Resources Environment Protection Policy which will ban materials such as e-waste and CFL's from landfill. Given this direction, it is essential that new product stewardship and/or Extended Producer Responsibility schemes be operational prior the landfill bans coming into effect.

Illegal dumping of a large variety of materials, including e-waste is currently a problem for many local councils. It is expected that this problem may increase without new disposal mechanisms being made available to the population for either no or a modest cost. This adds reason to making disposal opportunities available to rural residents, not just only to metropolitan consumers.

The AHRWMA strongly supports industry based and funded product stewardship and Extended Producer Responsibility schemes.

## **2. Improving the Market (section 6.5.2)**

It is recognised that a national market for the sale and reuse of materials is essential to ensure prices remain acceptable and to prevent stockpiling. The difference between a waste and a resource is not well defined nationally which subsequently confines markets to within state and territory boundaries. Economies of scale therefore cannot be achieved and currently a true market is yet to be realised.

It is acknowledged that in South Australia due to a lack of market and the fact that virgin materials are often cheaper than recycled materials (eg the construction and demolition industry) significant stockpiling of materials continues to occur. Through state regulation, the stockpiling of materials destined for the market for more than 12 months will now be illegal. However, without a market it will be found that these materials will be landfilled rather than re-used.

National market mechanisms, uniform regulation and national product standards for products derived from wastes or recycled materials will expand the markets for these materials with the goal of eliminating stockpiling and landfilling of these materials.

## **3. Pursuing Sustainability (section 6.5.3)**

It is agreed that the organics waste stream is another waste stream which can be better managed. Although domestic green organics are generally being collected and composted, some council's are now also collecting food organics. However, a large organics stream is that from commercial premises. There are large markets for composted materials and for organic soil enhances and suppliers in South Australia tend to have difficulty in maintaining supplies. It therefore would be advantageous to target this feedstock to ensure it no longer is landfilled with other mixed wastes.

This should not be overlooked by the proposed Policy, but other waste streams such as the construction and demolition stream and the commercial and industrial stream should not be overlooked either. In some locations, it continues to be cheaper to dump these wastes rather than sorting and sending for recycling.

However, in South Australia with pending landfill bans and the requirements to sort mixed wastes prior to dumping the residual wastes, this regulatory instrument may change behaviour. This could be applied on a national stage to ensure nationally competitive and equal markets for these materials.

It is agreed that the CPRS should drive further change however maximum benefit will only be achieved if the method for determining carbon credits is kept simple.

A final opportunity that should not be lost within this section is the concept of waste avoidance. This is the highest action on the waste hierarchy, but is not addressed in detail within the discussion paper. Mechanisms to encourage society and industry to avoid the generation of waste through purchasing decisions, manufacturing decisions and packaging decisions should be suggested and included in the Policy.

#### **4. Facilitating Investment (section 6.5.4)**

Investment in jobs, innovation and infrastructure cannot occur without the development of the necessary markets, the market instruments and the government support established through the National Waste Policy. It is clear that new technologies and industries will develop as a result of regulation and policy if options other than landfill or stockpiling of wastes/resources materials are mandated nationally.

Essentially regulation and procurement policies will develop markets that are either in their infancy or are yet to exist. Although this could be seen as a market intervention, it is an intervention which is required to reduce the quantity of waste being disposed to landfill and that which is being illegally dumped.

Investment is also increasingly likely if these markets are national. The concept of developing healthy markets only within state and territory boundaries will not achieve economies of scale and is also unlikely to create the level of viability that is required for their sustainability.

Therefore, in order to facilitate investment, the market frameworks must first be developed.

#### **5. Reducing Hazards (section 6.5.5)**

Measures to improve the management and disposal of hazardous wastes are supported by the AHRWMA. It would appear that in South Australia at least, there are limited and inconsistent programmes which currently manage these wastes. For example, some transfer stations and landfills accept combinations of oils, coolants, oil/water based paints and car batteries while others do not. Consumers therefore have limited ability to safely dispose of many of these household hazardous materials. Consequently these materials tend to be stockpiled, illegally disposed or are placed into kerbside bins.

Naturally, any hazardous waste must not be landfilled, however for this to be avoided the community must be provided with low or not cost accessible disposal options. Regardless of jurisdiction these wastes present exactly the same hazards. They should be uniformly labelled and be subject to uniform national standards. Materials falling into this category could also be subject of product stewardship or extended producer responsibility as previously discussed. Each local council across Australia should not have to develop and fund its own solution to this issue.

#### **6. Reporting Performance (section 6.5.6)**

A national waste data reporting system is supported. Currently without this data it is impossible for Australia to develop waste reduction or recycling targets. Further it is also impossible to determine success or failure with targets and goals if progress can not measured and data is not kept.

South Australia is currently developing a system of waste data capture which will improve the manner in which waste is managed in this state. However, it is not desirable to have multiple reporting systems where the same data needs to be entered multiple times into multiple databases. While a single national reporting system is supported, the use of multiple parallel databases based upon jurisdictional difference is not supported.

#### **7. Tailoring Solutions (section 6.5.7)**

Although this section primarily focuses of remote indigenous communities, the concept of being able to develop individual solutions consistent with Policy objectives is supported for those communities but also for local government in general. The proposed National Waste Policy will set standards, benchmarks, establish market frameworks and provide policy direction, the way in which the desired outcomes are achieved should allow for unique and/or individual solutions.

If waste is to be managed by objectives and outcomes within established frameworks, this philosophy should be supported. Clearly regulation is supported and required, but the actual on-ground solutions should not be highly prescriptive, but outcome based. This allows for innovation, the application of new technology and the ability to potentially reduce costs without compromising environmental standards.