



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

5 August 2009

Dear Sir/Madam,

Thank you for the opportunity to respond to the Australian Government's discussion paper on a National Waste Policy Framework.

Global Renewables operates the Eastern Creek UR-3R Facility which recycles residual household waste from a western Sydney population of around half a million people. We have international experience in advanced waste treatment (AWT) and are keen advocates of sustainable waste management policy.

We applaud the vision and scope of the NWP Framework and look forward to seeing it comprehensively implemented in regulations and guidelines across Australia. However moving beyond the written word towards the desired outcome is where the difficulty is going to be, because there is a massive flow of millions of tonnes of materials going to landfill every year that will continue to do so unless infrastructure (both legal and physical) and market development create a new network of sustainable materials management to replace dumps.

Global Renewables supports the seven "high level themes" as a framework for regulatory development. The discussion paper covers the necessary framework detail, but the overarching vision is not too clear, despite the 10 clear points in terms of section 6.3 ("The vision by 2020"). Europe has a vision of itself as a "recycling society" and although some might quibble that this misses the need to minimise waste first of all, it's still a concept that the general public can own. More technical descriptions such as dematerialisation, resource efficiency, energy efficiency and so on may be closer to what is required for ease of communication, but unless there is some "big picture" summary, many stakeholders will be lost in detail. There has been much talk since the 1992 waste policy of a paradigm shift to resource recovery- now is the time to make the National Waste Policy more like a National Recycling Policy.

In terms of targets, it is important that future waste management targets are not set in terms of landfill diversion percentage, because the current emphasis on percentages is an encouragement to count in all sorts of irrelevant materials- such as for example post industrial scrap (which has a value and would not end up in landfill) and meat byproducts which already have scrap value. Worse still, increasing recycling amounts are being used to hide increasing volumes of waste sent to landfill. Targets should be set in terms of reducing actual tonnages to landfill and the targets need to have short term consequences (such as the UK LATS system's annual and triennial goals) rather than the failed Australian aspirational targets.

The discussion paper makes a very worthy point on page 6 in recognising the lack of clear market signals to influence product design based on waste management outcomes. Manufacturers, brandowners and retailers seem to give insufficient weight to environmental

Global Renewables Australia P/L ACN 134 417 422

PO Box 202, Horsley Park NSW 2175, Australia

Telephone: 61 2 9677 3120 Facsimile: 61 2 9677 3199 Website: www.globalrenewables.com

design principles related to recycling outcomes, and as a result, there is a massive amount of waste packing and consumer dry goods in urban waste streams.

It is also good to see the paper's continual recognition of the "green jobs" potential in a new National Waste Policy. Global Renewables' Eastern Creek UR-3R Facility employs around 10 times the number of people that a landfill would if receiving the same volume of waste, and the employment opportunities in downstream beneficiation plants extends this even further.

The recognition of the value of organics recycling is even more important, and the paper recognises the water saving, soil conditioning and climate change benefits in several places, but only once recognises the importance of nutrient conservation (in particular phosphorus) in continuing to feed the growing global population sustainably. There is no sustainable agriculture without reuse of organic nutrients- the world is made to run that way.

In terms of the seven high level themes, we provide the following response:

1) Taking Responsibility.

The absence of a national framework for EPR is a fundamental barrier to progress in terms of resource efficiency

As well as improved stewardship of manufactured products, we need improved stewardship of our food nutrients and this means systems designed to address the recycling of all food nutrients and not just garden organics (which should as far as possible be processed and reused at their source).

Good stewardship of nutrients should also drive good stewardship of soils.

"Taking Responsibility" should also directly mean clarifying responsibility for the infrastructure and market development dealt with in themes 2 and 4, so that the current breaks in the closed loop system that we should have is not continually seen as "someone else's fault".

2) Improving the Market

The development of a "different and uniform classification system" for management of wastes as resources is certainly a worthy goal, but approvals systems are becoming more complex despite the best intentions of regulators. In this regard, having recycling goals embedded in regulators' strategic plans is an incentive towards finding a path through complex regulations to achieve good recycling outcomes.

Similarly, national technical specifications and guidelines developed in consultation between all stakeholders and market focussed would be a significant boon to recycling.

The recognition about the importance of encouraging the development of core infrastructure and technology is welcome and essential, because without the infrastructure of recycling, there is only dumping. The rate of development of this infrastructure is absolutely dependent on putting in place whatever level of security of feedstock supply is necessary for financing recycling projects, and this level will vary depending on factors such as processing prices, plant costs and product revenue.

As well as technology and regulations development in processing, there needs to be similar development in end use application, especially in the case of agricultural use of recycled organic products. Chemical fertilisers have a wealth of capacity and experience and Australian use of organic fertilisers is in its infancy by comparison.

Recognising the need to rehabilitate Australian mining sites to at least the local standard of good farmland would both improve the market for recycled organics and deliver a much needed improvement in the sustainability of the mining industry.

3) Pursuing sustainability.

Again, the recognition of the benefits and importance of recycling organics is appreciated. It is also worth noting that removing food organics from landfill will reduce the rate of carbon release from high carbon to nitrogen ratio materials and so improve climate outcomes as well as agricultural outcomes.

The paper makes a passing mention of the need for supplementary approaches to “encourage recovery and re-use of organics within wastewater”, but this needs more prominence in future strategy. Wastewater biosolids is a significant source of key nutrients (especially phosphorus and nitrogen), but it is naturally high in water and therefore costly to transport. Integrating biosolids composting with garden waste composting should be a goal in every city, as garden waste composting always requires additional water, and is a net water user.

4) Facilitating investment.

The recognition of the role of government in purchasing policy and the opportunity to drive green jobs is again applauded.

There also needs to be a recognition of the role of government, especially local government, in establishing suitable scale and bankability of AWT projects. Even better would be a recognition, as in the UK, that regional council organisations need to procure their own AWT sites and gain the required development consents to enable real competition in the industry.

Larger scale procurement of infrastructure also needs the development of Public Private Partnerships and would be further assisted by the Private Finance Initiatives also operational in the UK.

5) Reducing hazards.

While Australia has generally good regulations for minimising emissions from facilities, it is struggling with preventing emissions of hazardous materials to landfills. This creates both potential environmental issues and ensures the continual loss of scarce resources. Landfilled metals will never be a viable recoverable resource at the rate they are landfilled in Australia, but landfilling metals guarantees the contamination of the otherwise recyclable organics in the landfill.

The paper’s recommendation for labelling of content and risk is welcomed. In a similar vein, the labelling of products’ actual recycling performance would drive product designers and producers to more thoughtfully consider the end-of-life use of their creations.

The need to develop both local and national capability for hazardous waste recycling would also drive better outcomes.

6) Reporting on performance

The lack of up to date data on waste composition and outcomes is a barrier to progress and we support the publishing of accurate data, regularly.

Governments have a vital role in tracking stocks and flows of resources, and there is a real lack of accountability in many jurisdictions because of a lack of reliable data and reporting.

7) Tailoring solutions.

Tailoring solutions to smaller scale will require some financial incentives that currently favour innovation in larger scale projects.

Developing a better waste policy will require a federal, state and local framework designed to support resource recovery systems, not disposal systems. Global Renewables would like to see the formation of regional resource recovery authorities, with adequate financial and technical resources from commonwealth and state funding and able to direct local authorities' waste strategies. Given the great progress being made in the United Kingdom, we believe that similar waste reduction targets to theirs could be adopted, especially organics targets such as a reduction of biodegradable municipal waste to landfill to 35% of 1995 levels by 2020.

Delivering more resource recovery will require the creation of incentives for to be in the business of recycling rather than in the business of disposal. This will require that policy measures (such as waste levies and government charges) do not increase recyclers' costs.

AWTs are one essential component of an integrated resource recovery system at national level. To support the widespread adoption of AWT infrastructure, we would like to see national waste policy support state regulations that gradually ban the landfilling of untreated organic wastes and support the infrastructure shift through appropriate waste levies, state resource recovery authorities and local government landfill targets that reduce landfilled waste to sustainable levels. Adapting a system such as the UK's Landfill Allowance Trading Scheme (LATS) with private finance initiative (PFI) systems funded through waste levies would soften the financial impact on councils while radically reducing landfilled municipal waste. The construction of economically-sized AWT funded through PFI initiatives would also provide the core infrastructure for treatment of Commercial and Industrial waste, if landfill levies are raised to provide a level playing field for recycling against disposal.

Yours faithfully,

Global Renewables P/L



John Lawson
General Manager Development