Submission

to

Senate Legal and Constitutional Affairs Committee

Inquiry into the National Radioactive Waste Management Bill 2010

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No Waste Alliance requests the opportunity to give further evidence at any public hearings for this inquiry, and firmly recommends that a hearing should be held in Tennant Creek

Monday 15 March, 2010

Committee Secretary,
Senate Legal and Constitutional Affairs Committee

No Waste Alliance is a network of environment and community groups around the Northern Territory. The Alliance formed with membership including concerned individuals and representatives of stakeholder organisations in Darwin in response to Dr Brendan Nelson's announcement in July 2005 that, contrary to Federal Government promises during the previous federal and NT elections, the NT has been targeted for a nuclear waste dump. The No Waste Alliance has since grown into a network of similar community groups around the Territory, and aims to give Territorians information and options for action in response to the unwanted long-lived pollution presented by the nuclear industry.

The No Waste Alliance would like to welcome the repeal of the Commonwealth Radioactive Waste Management (CRWM) Act (2005), a particularly insidious piece of legislation which has hung over the heads of Territorians for over four years. This bad law from the Howard-era has rightly been described by government senators as 'extreme' and 'heavy handed', for the ruthless way in which the Act comprehensively overrides not only any Territory law but also most Commonwealth legislation that may impede the dump plan. The CRWM Act not only ruled out any legal impediment to siting a Commonwealth nuclear waste dump in the NT, but also systematically identified and exterminated all avenues for administrative appeal, judicial review and legal challenge. The Act targetted particular families and communities unlucky enough to live next to – or, in one case, surrounding – remote Commonwealth land identified as vulnerable. So we'd like nothing more than to celebrate it's demise.

Unfortunately, however, we are not in a position to do so. The National Radioactive Waste Management (NRWM) Bill before us may satisfy some perverse interpretation of one small part of Labor's election commitments in relation to nuclear waste management. But in the same breath, this new Bill to repeal actually reproduces many of the heavy handed and anti-democratic measures from the old Act, which leave Territoirans powerless in the face of Federal determination to dump Commonwealth nuclear waste here in the NT. Not only does the new Bill cut-and-paste large swathes of the old Act, including most of the worst indignities to existing NT and Federal laws, but this new Bill also explicitly references clauses in the old Act which are to be deemed to be valid, despite the repeal.

It must be recognised that this Bill is predicated around ensuring the existing nomination of Muckaty Station, made under the old CRWM Act, in the form of a secret agreement between the Northern Land Council (NLC) and the Federal Government. This nomination was made by the NLC in the context of provisions in the amended CRWM Act that not only hide the agreement from scrutiny, but also explicitly sidestep the traditional decision making provisions and Land Council responsibilities defined by the Aboriginal Land Rights (NT) Act 1976 (ALRA).

Given this context, it is hardly surprising that the Muckaty nomination has been controversial from the outset. While some Ngapa Traditional Owners have endorsed the secret agreement entered into with the Federal Government by the NLC, other Traditional Owners from the Muckaty Land Trust, including some Ngapa, have continued to vocally oppose the nomination.

The Bills Digest tells us that :

> Reports suggest that there are mixed feelings amongst the traditional owners of the Muckaty station site regarding the potential for the facility to be located there[1], including elements of strong opposition[2].

In the shadow cast by the CRWM Act's denial of procedural fairness and judicial review in relation to the nomination, this conflict remains unresolved. There is no information on which to assess whether or not the government has relied upon the escape clauses in the CRWM Act (transcribed to the NRWM Bill) that allow the nomination to stand regardless of the validity of the NLC's decision making processes – however many members of the Land Trust insist they have been excluded.

The Committee must recognise first that the Muckaty nomination is at the heart of this Bill, and secondly that it remains highly contested. With this understanding, NWA firmly recommends that public hearings for this inquiry must be held in Tennant Creek. As described in previous correspondence (attached), failure to do so would present significant obstacles to the participation in this Inquiry of some of those individuals who have the greatest interest in the Committee's work.

Given the short timeframe for public comment to this inquiry, and given that the new Bill is largely a cut and paste of the old Act, this submission at points resorts to a similar strategy, judicially reproducing from our responses to the senate inquiries held for the CRWM and subsequent Amendment Bills.

Rationale of the Bill

Repeal of the CRWM Act

the Explanatory Memorandum specifies that :

> *The repeal and amendment satisfies a 2007 ALP Platform commitment.*

This is a loaded political statement, and as such it is remarkable to find it in this context. We've already raised the question of whether a commitment to repeal is truly met when the enacting Bill reproduces most of the old Act, and deems the secret, unchallengeable nomination of Muckaty Station to remain valid.

Schedule 2 of the Bill, the so-called transitional provisions, really put the lie to this government's

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1 L Murdoch and T Arup, 'Fallout over NT nuclear dump site' *The Age,* 27 February 2010, p. 6

2 N Wasley and J Green, 'Sense needed to tackle N-waste', *Canberra Times,* 26 February 2010, p. 21

claim to have kept their election promises. Although the old Act is to be repealed as promised, the nomination of Muckaty Station under section 3A of the CRWM 2005 Act is deemed to remain valid.

Furthermore, subsection 3 of section 1 to the schedule declares that section 3D of the old CRWM 2005 Act – which renders the nomination of Muckaty Station immune from standards of procedural fairness – and the old ADJR Act – which, in clause (zc) of Schedule 1 protects the nomination from Judicial Review - continue to apply. In this way, the Federal Labor government seek to rely on the unfair, antidemocratic and exclusive tools used by the previous government in their strategy of imposing unwanted waste on unwilling and vulnerable communities. These 'transitional provisions' in Schedule 2 of the Bill explicitly rely on those very significant provisions in the laws which are supposedly being repealed, such that the nomination of Muckaty Station will remain secret and immune from legal recourse.

2007 ALP Platform

Beyond promising to repeal the old CRWM Act, the policy platform committed to :

- establish a process for identifying suitable sites that is scientific, transparent, accountable, fair and allows access to appeal mechanisms.
- identify a suitable site for a radioactive waste dump in accordance with the new process.
- ensure full community consultation in radioactive waste decision-making processes.
- commit to international best practice scientific processes to underpin Australia's radioactive waste management, including transportation and storage.

These election promises from the 2007 ALP Policy Platform have been abandoned. Instead, the new Bill sees the ALP Government pursuing Muckaty Station, which was identified in the absence of scientific criteria. When the federal Bureau of Resource Sciences conducted a national repository site selection study in the 1990s, informed by scientific, environmental and social criteria, the Barkly area did not even make the short-list of "suitable" sites.

The new Bill does not restore transparency to the nomination, but rather continues to hide behind the confidentiality of the former government's secret deal with the Northern Land Council (NLC), and retains the protections from scrutiny, procedural fairness and judicial review that were provided by the old CRWM Act : in some cases, explicitly referencing and deeming valid specific clauses from the Act to be 'repealed'.

The new NRWM Bill maintains the extreme measures of the CRWM Act to protect the nomination of Muckaty by the NLC from public scrutiny and legal challenge by the many Traditional Owners of the Muckaty Land Trust who remain opposed to the nomination.

A genuine commitment to best practice must give due attention to international standards and trends towards recognising the importance of community participation in the siting of radioactive waste facilities. A conference of the International Atomic Energy Agency in 2000[3] addressed the siting of repositories and emphasised the importance of early and sustained public participation.

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3 Bennett, D. 2000, Meeting Report: IAEA Conference: International Conference on the Safety of Radioactive Waste Management Journal of Radiological Protection

The UK Committee on Radioactive Waste Management (UK CoRWM) recommended in a 2006 report[4] that :

> community involvement in any proposals for the siting of long term radioactive waste facilities should be based on the principle of volunteerism, that is, an expressed willingness to participate ... there is a growing recognition that it is not ethically acceptable for a society to impose a radioactive waste facility on an unwilling community.

By this measure, the present strategy falls well short of world's best practice.

On each of theses counts, the ALP have clearly failed to meet their election-year policy platform commitments related to nuclear waste.

Other election pledges

The Platform was not the ALP's only source of election commitments regarding the dump. On 6 March 2007, In a media statement by Science Minister Kim Carr and NT Labor politicians Trish Crossin and Warren Snowdon, Federal Labor also committed to:

> • legislate to restore transparency, accountability and procedural fairness including the right of access to appeal mechanisms in any decisions in relation the siting of any nuclear waste facilities.
>
> • ensure that any proposal for the siting of a nuclear waste facility on Aboriginal Land in the Northern Territory would adhere to the requirements that exist under the Aboriginal Land Rights, Northern Territory Act (ALRA).

As discussed above, the NRWM Bill fails to restore transparency, accountability and procedural fairness, or indeed any access to appeal, regarding the nomination of Muckaty Station. There are therefore no grounds for testing the adherence of the Muckaty nomination with the decision making provisions and responsibilities of the Land Council under ALRA. To the contrary, if this Bill is enacted, subsection 4 of section 4 would guarantee that the nomination will be deemed valid even if it were found to be in conflict with the ALRA provisions.

On 27 September 2007, then Shadow Science Minister, Senator Kim Carr, stated:

> "Labor is committed to repealing the Commonwealth Radioactive Waste Management Act ***and establishing a consensual process of site selection***. Labor's process will look to agreed scientific grounds for determining suitability. ***Community consultation and support will be central to our approach***".

Other Federal Labor politicians made similar promises. All have been abandoned.

Other levels of commitment

A resolution was passed unanimously by the NT Labor Conference in April 2008 calling upon the

4 Committee on Radioactive Waste Management, 2006, Recommendations to Government

Federal Government to exclude Muckaty on the grounds that the nomination

> was not made with the full and informed consent of all Traditional Owners and affected people and as such does not comply with the Aboriginal Land Rights Act

Indigenous Affairs Minister Jenny Macklin, Science Minister Kim Carr and Environment Minister Peter Garrett among others have acknowledged the distress and opposition of many Muckaty Traditional Owners.

In summary, the rationale for this Bill is flawed.

Labor were not elected to government with a promise to repeal the CRWM Act – then rewrite most of it in a similarly named Bill, and deem certain actions and provisions under the old Act valid despite it's repeal.

Rather, Labor came to government on a well defined, clearly communicated and prominently repeated broad commitment to make a clean break from the previous 12 years of the failed strategy of dumping on vulnerable communities. There's no simple misinterpretation of the word 'repeal' going on here : this Bill represents the Labor party turning their back on well understood and agreed principles of consensus; consultation; transparency; best practice; rights to appeal; fairness; and accountability.

This Bill is not what is required in order to fulfill Labor's election commitments.

Terms of reference

The Inquiry invites us to consider issues relating to procedural fairness and the Bill's impacts on, and interaction with, state and territory legislation.

nomination by a land council

Section 4 of the NRWM Bill sets out in subsection 2 criteria for nomination, which echo section 3B – 'rules about nomination' from the CRWM 2005 Act, minus the abandoned fantasy of a nomination by the NT Chief Minister.

Among these criteria, we find in part (f) familiar items which reinforce obligations under ALRA; including the explicitly identified provisions for traditional decision making processes under section 77A, but also the functions of a land council from section 23 of ALRA :

> **Part III – 23.(1)(c)** to consult with traditional Aboriginal owners of, and other Aboriginals interested in, Aboriginal land in the area of the Land Council with respect to any proposal relating to the use of that land;

and

> **Part III – 23.(3)** In carrying out its functions with respect to any Aboriginal land in its

area, a Land Council shall have regard to the interests of, and shall consult with, the traditional Aboriginal owners (if any) of the land and any other Aboriginals interested in the land and, in particular, shall not take any action, including, but not limited to, the giving of consent or the withholding of consent, in any matter in connexion with land held by a Land Trust, unless the Land Council is satisfied that:

(a) the traditional Aboriginal owners (if any) of that land understand the nature and purpose of the proposed action and, as a group, consent to it; and

(b) any Aboriginal community or group that may be affected by the proposed action has been consulted and has had adequate opportunity to express its view to the Land Council.

The new Bill goes on in subsection 4 to declare that

Failure to comply with subsection (2) does not invalidate a nomination

and in doing so grants specific immunity to a nomination by a land council under this section of the new Act from the obligation for inclusive consultation provided in the Federal ALRA legislation.

This echoes the clause added in 2006 by way of the CRWM Legislation Amendment Bill 2006, which inserted after subsection 3B(2) :

(2A) Failure to comply with subsection (1) does not affect the validity of a nomination.

In 2006, the No Waste Alliance told a senate inquiry that:

those new provisions in the CRWM Amendment Bill which specify that failure to comply with 3B(1) would not invalidate a nomination by a Land Council (or declaration by the Minister) are intended to revoke those existing rights Traditional Owners hold to, as the Minister said:

"make their own decisions about infrastructure developments on their own land"

Although the Explanatory Memorandum states :

The current Act provides that no person is entitled to procedural fairness in relation to the key decisions to be made under the Act. The Bill will require the Government to accord procedural fairness in relation to such decisions.

the new NRWM Bill does not recognise the nomination by a Land Council under section 4 as one such key decision. Subsection 5 of section 4 once again mimics the Act this Bill repeals by declaring that a nomination under this section is not a legislative instrument, thereby denying this deliberately flawed process any further parliamentary review. In this way the standards of procedural fairness and judicial review are explicitly denied in the case of the nomination of Muckaty Station

other federal and Territory laws

Given that much of the new NRWM Bill reproduces text from the old CRWM Act, there remain many conflicts with existing laws.

Sections 11 and 12 from the new NRWM Bill are taken verbatim from sections 5 and 6 of the old CRWM Act. This cut-and-paste job explicitly overrides any state, territory or Commonwealth laws that might impede activities necessary for the site selection process. Section 12 even explicitly eliminates laws for the protection of indigenous heritage (Aboriginal and Torres Strait Islander Heritage Protection Act 1984) and the environment (the Environment Protection and Biodiversity Conservation Act 1999) to the extent that they may impede any activities 'necessary for or incidental to the purposes of selecting a site.'

In 2005, in response to the same text appearing in the CRWM Bill, NWA submitted :

> Beyond this outrageous dismissal of fundamental commonwealth environmental protection legislation, the Bill seeks to eliminate protection provided by any State or Territory laws that relate to controlled material, radioactive material, dangerous goods and the environmental consequences of land use in the siting, construction, operating and maintenance of a Dump. Not only is the authority of Northern Territory laws and government challenged by this grab for power, but so too are the general principles of environmental protection and radiation safety. The Bill doesn't merely seek to transfer administrative power to the Commonwealth, or to supersede Territory controls, standards and procedures with federal alternatives, but rather aims to eradicate such measures altogether. So far as these could regulate, hinder or prevent activities relating to the Dump, such laws and provisions may have no affect if this Bill stands as law.
>
> Notably, the people of the Northern Territory are so concerned about the environmental risks and long term impacts of the transportation and storage of radioactive materials, that the NT government recently introduced new laws to control such actions, and apply tight radiation protection measures and standards. This popular expression of the clear will of the people of the Northern Territory would be dismissed by the enactment of this Bill.

Similarly, Part 5 of the new NRWM Bill (sections 22 – 24) is taken from Part 4 of the old CRWM Act 2005 (sections 12 – 14), and override any State or Territory law that might stand in the way of the dump. Any Commonwealth law, aside from the relevant Environment Protection and nuclear regulation laws, may be prescribed by the regulations to ensure they do not obstruct the dump.

Sections 13-17 give the Minister sole discretionary power to extinguish all rights over land and declare it as the site for a Commonwealth nuclear dump, with the same crippled recourse to natural justice as discussed in relation to accepting a site nomination. Where the old CRWM Act explicitly stated that no person is entitled to procedural fairness in relation to the Minister's declarations and decisions, now we are granted the comfort that the Minister

considered public comment in making those same decisions – a provision described by the Bills Digest with the understated note that

> The new requirement is not however unduly onerous.

This gesture towards the standard of procedural fairness, as also described in section 9, is better understood as severely limiting, rather than according, procedural fairness. The process defined falls well short of community expectations for a proposal of this scope. Significantly, both section 9 subsection 5(c) and section 17 subsection 2(d) limit the invitation of comment to persons with a right or interest in the land being nominated or accepted in the associated section. The degree of access then provided falls well short of what may be reasonably expected for a proposal of this scale. For example, a proposal to clear land to build a shed in rural Darwin would not only invite comment from any person; these comments would be addressed by an independent authority, would be subject to a public meeting, and an individual response describing the decision maker's conclusions. People in Darwin would find it bizarre to consider that the degree of procedural fairness offered in the unlikely scenario of a nomination to store nuclear waste in Humpty Doo would be less than that required to erect a new shed or plant a small plot of mangoes.

Given that Traditional Owners for the likely haulage route from the Stuart Highway to the Ngapa site are not party to the secret agreement between the NLC and Federal Government, this is the only participation afforded to those Traditional Owners whose land will be subject to a declaration by the Minister under subsection 4 of section 13.

Section 19 of the new NRWM Bill copies verbatim section 10 of the old CRWM Act 2005, ensuring the Minister's power to extinguish all rights over land and acquire that land in order to site a Commonwealth nuclear waste dump cannot be impeded by an State, Territory or Commonwealth law.

Granting of rights and interests

The sections from part 6 describe granting of some rights and interests to land in the case of Aboriginal land nominated by a Land Council when the facility is no longer required. These sections are taken directly from part 4A of the old CRWM Act 2005.

The following issues were raised by the No Waste Alliance in the senate inquiry to the 2005 Bill.

> While the principle of returning land acquired for a nuclear dump to Traditional Owners seems to be generally agreeable, the processes outlined in the Bill once again describe something being done to, rather than with, Traditional Owners. Experience with the contaminated site at Maralinga show that Traditional Owners need to have a say in whether they accept that a contaminated site is in an appropriate condition to be relinquished by the Commonwealth. Otherwise we risk a situation where regulators can seek to wash their hands of unresolved issues which they must bear responsibility for. On these grounds alone, the current framework for return of the site must be rejected.
>
> This concern is further exacerbated in consideration of the evolving nature of local and

international guidelines for environmental protection from radiological pollution and ionising radiation in general. The recently released draft report 'Opportunities for Australia?' from the Uranium Mining, Processing and Nuclear Energy (UMPNER) Review reports :
International radiation protection standards are primarily designed to protect human health. Until recently it has been assumed that these standards would incidentally protect flora and fauna as well. However, it is now agreed that additional standards and measures are required to protect other species, and a number of international organisations including the International Commission on Radiological Protection and the IAEA have established new work programs to this end.

A recent Public Environment Report for new plans to dig over the abandoned and polluted Rum Jungle Uranium Mine near Darwin included an appendix from ANSTO which acknowledged :

The ICRP is developing recommendations to assess radiation effects on nonhuman species. The new objective is to safeguard the environment, by preventing or reducing the frequency of effects likely to cause early mortality or reduced reproductive success in individual flora and fauna, to a level, where any effects would have a negligible impact on conservation of species, maintenance of biodiversity, or the health and status of natural habitats or communities. The international scientific community is developing tools to facilitate this philosophy, for example via FASSET (Framework for Assessment of Environmental Impact) and ERICA (Environmental Protection from Ionising Contaminants (EPIC) programmes (http://www.erica-project.org/) funded within the European Community .

So-called 'acceptable limits' for exposure to ionising radiation have been lowered a number of times in the brief history of the nuclear industry, including the not-so-distant past, and we can expect that ARPANSA, while in some other areas not currently even in accord with existing ICRP guidelines, can be expected to be called upon to adopt these new European standards for environmental protection as they gain international currency. This perspective raises a number of questions :

- Which standards will be applied by the regulator in assessing a decision to return ownership and rights over the site to Traditional Owners?
- If the rift between Australian standards for radiation protection and those employed elsewhere around the world grows, will Traditional Owners be able to call upon improved levels of protection which have been, or are being, instituted elsewhere?
- If land were to be relinquished under an inadequate set of standards, what recourse would Traditional Owners have once ARPANSA's standards for environmental protection are improved on the basis of developments around the world?

other nominations

Under division 2, general nominations, section 6 subsection 1 part (d) allows for the potential nomination of a site where the nominee's interest in the land is :

(i) a lease of land granted by or on behalf of the Crown, a Minister of the Crown, a statutory authority or any other prescribed person, under a law of the Commonwealth, a State or a Territory;

It is inappropriate that a lease holder may nominate land for a purpose so vastly beyond that for which the lease was intended. It must be recognised that there is a gulf between nomination and community consent. It is alarming then that section 8 gives the Minister absolute discretion over approval of such a broad range of potential nominations.

By providing an 'exhaustive statement' of the requirements of the natural justice hearing rule in relation to the Minister's approval of such a nomination, section 9 sees that procedural fairness is strictly limited to guaranteeing that the Minister, in applying his power of discretion, has ticked boxes related to calling for, and considering, public comments – requirements which may well be met without any communication beyond the Minister's office.

This is an unacceptably inaccessible and inscrutable process for such an important decision. But it is not an unfamiliar design : this procedure follows the same strategy as employed by the former government through the CRWM Act which this Bill seeks to replace.

A new way forward

NWA continues to advocate for a new direction in addressing our nation's challenge of managing long lived nuclear waste. We continue to recommend that the first step is to minimise the creation and the transportation of wastes.

Our submission to the 2005 senate inquiry recommended that :

> Despite decades of attempts at various angles of the problem, the pressing concerns about a national stockpile which is vaguely defined and poorly controlled have represented an insurmountable hurdle. Recognising that waste minimisation is a cornerstone of the responsible management of any wastes, from greenhouse gases to landfill, it is essential that the reactor program and fuel enrichment experiments, which threaten to churn out more of the most highly radioactive, toxic and long-lived wastes made in Australia, are phased out and permanently decommissioned. These important advances will, to some extent, act to defuse the tension surrounding the challenge of responsibly managing radioactive wastes in Australia.
>
> Only when these initial steps are followed will the Australian people, and our State and

> Territory Governments, be comfortable enough to take a deep breath, and embark in a measured but steady fashion, upon participatory processes to establish facilities for the interim management of our legacy of radioactive wastes.

We reject the false construction of a deadline driving the panic towards this dump. A decision rashly imposed on a conflicted and vulnerable community is unlikely to stand the test of time. There remain a number of perfectly acceptable short term measures that could buy whatever time may be needed to build a durable decision regarding intermediate-term management, including negotiating a delay in the return of reprocessed fuel rods and utilising available facilities at Lucas Heights for short term storage.

Remote communities in Australia should be appropriately funded for the basic services of health, housing and education that most Australians take for granted. It is entirely inappropriate for basic funding to be linked to important decisions about industrial proposals. The outstanding need for education funding at Muckaty should be addressed immediately and independently of the issue of nuclear waste.

Any site selection process ought to be equally well grounded in technical siting criteria, and the principle of voluntarism.

Given that this Bill so closely resembles the same Act which it is pretending to repeal, it is fitting that the final word comes from our submission to the 2005 enquiry :

> While this Bill may provide further legal shoring for the hole this Government is digging itself, the law remains only one force among many others, all of which are relevant to decision making regarding the generation and management of radioactive wastes.
>
> The most prominent of these remains the force of public opinion.
>
> As international standards regarding the siting and operation of nuclear waste facilities already recognise, a solution to the challenge of responsible management of radioactive wastes cannot be rammed down the throats of the communities who will host this responsibility. Rather, such a solution requires social license, which can only be achieved through informed participation by all parties.

APPENDIX – correspondence re hearings.

from **No Waste Alliance** <darwin@no-waste.org>

to legcon.sen@aph.gov.au

date 14 March 2010 14:56

subject Legal and Constitutional Affairs Committee Inquiry into the National Radioactive Waste Management Bill 2010

G'day,

I'm busily preparing a contribution to this inquiry from the No Waste Alliance.
NWA is a network of community groups around the Territory responding to the issues posed by nuclear waste; we've participated in previous senate inquiries surrounding the Commonwealth Radioactive Waste Management Act.

But today I'm just writing a quick note regarding a media release I saw on my alerts this morning : http://scott-ludlam.greensmps.org.au/content/media-release/greens-blast-labor-over-no-waste-dump-hearing-central-australia

While unclear as to the status of this information, it does prompt me to immediately contact the committee to firmly recommend that hearings should be held in Tennant Creek.

The committee cannot fail to recognise that, at the crux of this legislation, is the contested nomination of Muckaty Station as a site for the nuclear dump.

Little over a week ago, one group of Traditional Owners came to Darwin for a media appearance restating their interest in the project, while another group of Traditional Owners joined a large public meeting in Tennant Creek to express their outright opposition.

This unresolved conflict has been allowed to fester precisely because of the immunity to judicial and administrative review granted by both the old and new dump laws in relation to the nomination of Muckaty. If hearings were held in Darwin rather than Tennant Creek, it would place a significant logistical and financial obstacle to participation for many local people with a strong interest in this inquiry. Doing so would not only further disenfranchise those Traditional Owners who are not party to the secret deal between NLC and Federal Government for the nomination of Muckaty, but also risk failing to hear from some of those who are most immediately impacted by the new Bill; inadvertently sweeping under the carpet one of the most significant concerns with this Bill.

I assure the Committee that a member of the Alliance will be able to address the inquiry wherever hearings are held.

This letter will be appended to the full submission.

thanks,

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Justin Tutty

member, No Waste Alliance