

15 May 2008

The Secretary,
Senate Standing Committee on Environment, Communications and the Arts
PO Box 6100 Parliament House
CANBERRA ACT 2600

Dear Sir/Madam

Submission Regarding the Inquiry into the Management of Australia's Waste Streams

Campbelltown City Council has resolved to prepare a submission in response to the invitation of public submissions to the Senate Inquiry into the Management of Australia's Waste Streams. This submission highlights the need for further investigation into the viability of drink container deposit legislation, and the benefits of compulsory Extended Producer Responsibility.

Drink Container Recycling

Council supports the notion of drink container deposit legislation, commonly referred to as Container Deposit Legislation, or CDL. The vast majority of Councils across Australia pay either staff or contractors to collect kerbside recyclables. In addition, Councils pay recycling companies a fee (per tonne) to accept and process kerbside-collected recyclables. For example, in the current financial year, the ratepayers of Campbelltown City will incur approximately \$1.28 million for the fortnightly kerbside collection of recyclables, and in the order of \$550,000 for their disposal, i.e. a total of approximately \$1.83 million per year.

One of the common arguments against CDL is that it may undermine Councils' kerbside recyclables collection programmes. This argument is based upon the concern that CDL may result in the removal of higher value product (eg. PET plastic) from the kerbside recycling stream, leaving a mix of residual recyclable products of lesser value. This may result in an increased charge to Councils for disposal of the lesser-valued recyclables collected at the kerbside, which would in turn result in higher charges to ratepayers.

However, this argument does not take into account the reduction in disposal costs to Councils due to lighter bin weights upon the introduction of CDL (especially with the removal of a substantial proportion of glass bottles from the kerbside collection scheme). In addition, it is possible that the reduced volumes of recyclables placed into bins as a result of CDL could result in a reduction in collection frequency, and therefore a reduction in associated collection costs. For example, assuming that CDL resulted in a 50% reduction in weight and volume of recyclables presented at the kerbside in the Campbelltown Local Government Area, the reduced disposal costs and a change of collection frequency from fortnightly to

monthly, would result in a saving to ratepayers of approximately \$900,000 per year. The question arises as to whether the increased annual disposal costs (due to the recyclables being of lesser value to the recycler), would be more or less than the \$900,000 saved by Council.

The above scenario uses a number of assumptions that may or may not be accurate. In order to more accurately estimate the likely impact of CDL on Councils, it is recommended that an independent review be conducted to ascertain:

1. the projected reductions in weight and volume of kerbside-collected recyclables, should CDL be introduced, and
2. the likely increase in costs incurred by recycling companies for accepting kerbside-collected recyclables following the introduction of CDL.

Litter in Public Places

A substantial proportion of litter in public places such as roadsides, parks, gardens and bushland is made up of plastic and glass beverage containers. It is well documented that the majority of litter collected at annual Clean Up Australia Day events consists of drink containers. Litter removal throughout the rest of the year imposes a substantial cost to ratepayers. It is highly likely that CDL will result in a reduction in roadside litter. While this is a highly desirable outcome from an environmental point of view, it is difficult to quantify the financial savings.

Extended Producer Responsibility (EPR)

An EPR policy was introduced in New South Wales through the *Waste Avoidance and Resource Recovery Act 2001*. The first EPR Statement was published in 2004, identifying a number of 'wastes of concern'. The 2005/06 EPR Priority Statement identified 17 wastes of concern, namely:

Agricultural/veterinary (Agvet) chemicals	Packaging
Agvet chemical containers	Paint
Batteries	Plastic bags
Cigarette Butts	Polyvinyl Chloride (PVC)
Computers	Televisions
End of life vehicle residuals	Treated timber
Mobile telephones	Tyres
Office paper	Used oils and lubricants
Other electrical products	

In its early stages, the NSW Government's EPR policy encouraged various industries to introduce voluntary EPR strategies. This approach has been met with variable responses from industry. Some industries are at reasonably advanced stages of implementing take-back programmes (for example, some computer companies). Others have progressed very slowly, and some industry groups, it could be considered, may have implemented strategies to delay the introduction of EPR schemes.

The NSW Government's 2007 EPR Priority Statement gives notice that certain products "could require regulations relating to producer responsibility schemes to be initiated in NSW in the coming 12 months". The Statement further advises that "this could involve the introduction of a safety net in to underpin a voluntary industry EPR scheme . . . or could involve full regulation".

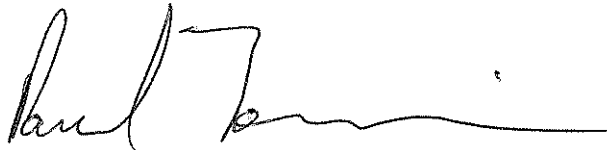
While it was prudent to offer industry the opportunity to implement voluntary EPR schemes within acceptable time-frames, it is considered that in most cases the rate of progress towards voluntary schemes is unsatisfactory, and should no longer be tolerated by the NSW Government.

Councils around Australia have entered into or are exploring various advanced waste processing and treatment technologies in order to decrease the volume of waste disposed to landfill. Indeed, Campbelltown City Council has recently entered into a long term contract for the construction and operation of a state-of-the-art advanced waste processing and treatment facility, that will result in around 88% of domestic waste being re-used or recycled, and only 12% landfilled. As with most advanced treatment technologies, the success of the process is highly dependent upon minimising the input of hazardous wastes into the domestic waste stream, such as paints, oils, treated timber and batteries. These products entering the domestic waste stream will seriously impact the operation of the facility, contaminating the otherwise re-usable waste. The key to minimising the likelihood of these hazardous products entering the domestic waste stream will be to provide householders with convenient alternatives. It is considered that the most crucial element of an effective EPR scheme for these products will be compulsory point-of-sale take-back arrangements, where residents can return these items, free of charge, to points of sale.

In order to support the technological viability of advanced waste treatment technologies, which will result in significant reductions in the volumes of domestic waste-to-landfill, Council urges the Senate Committee to recommend the introduction of compulsory EPR schemes for wastes such as paint, batteries, treated timber, computer hardware and motor vehicle tyres, with particular focus on compulsory free point-of-sale take back arrangements for these products.

If you require any further information please contact Jeff Lawrence, Director Planning and Environment on (02) 4645 4000.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Tosi', with a long horizontal flourish extending to the right.

Paul Tosi
General Manager