



WASTE CONTRACTORS
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RE: Inquiry into the Management of Australia's Waste Streams

We refer to your letter dated 1st April, 2008 and offer the following comments.

a. Trends in waste production in Australia across household, consumer, commercial and industrial waste streams

- The major trend in household waste production across Australia is the gradual replacement of 240 litre mobile garbage bins with a smaller size bin (120 litre or 140 litre) for domestic waste. These domestic waste bins are serviced weekly.
- These smaller bins are supplemented by increased recycling collections (240 litre bin co-mingled recycling collected fortnightly and 240 litre green waste bins collected fortnightly/monthly depending on the season)
- Governments that collect substantial waste levies need to recognise that the remaining fraction of waste contains an organic fraction (food, paper, garden waste etc) and that this is a potential resource. There is an opportunity for Government to fund systems and infrastructure in order to help create markets for the use of this composted material, hence further diverting material away from landfill and providing a regular source of organic material for farming and rehabilitation purposes.
- Council Domestic Clean-Up services are being phased back, where Councils had previously provided this service on a quarterly basis, Councils are beginning to recognise OH&S and Public Liability issues and are either scaling back the frequency of these collections to twice per annum, altering the offering so that residents are required to request service via a phone call or withdrawing this service and offering residents a drop-off centre.

b. Effectiveness of existing strategies to reduce, recover or reuse waste from different waste streams;

- A key waste management challenge across all of Australia is the issue of commercial waste recycling, and the challenge is to ensure that we aim to achieve the same success with commercial recycling as what has been achieved with household recycling.
- In NSW we now have a very significant waste disposal levy (Metropolitan Area \$46.70 per tonne, Extended Regulated Area \$40 per tonne and rural NSW no levy). This levy has been very effective in promoting recycling and re-use options within the heaviest parts of the waste stream however the greatest challenges lie in how this levy will impact the mixed, lighter parts of the waste stream.
- This levy is applied at all landfills and fails to distinguish between a well run landfill and a poorly operated landfill. In the interest of providing a fair and sustainable range of disposal solutions, Governments need to address this inequity.

c. Potential new strategies to reduce, recover or reuse waste from different waste streams;

- There needs to be more training opportunities provided for employees and contractors. This will be vital in order that we better prepare our businesses & our workers for the challenges of more recycling, more reuse and the business & regulatory demands of a more sophisticated industry. Government can assist by providing more funding opportunities (for example - hypothecation of a portion of waste levy funds into waste management training schemes).
- The application of the waste levy by State Governments on the disposal of asbestos waste at landfill needs to be closely examined. If the intention of a waste levy is to encourage recycling and divert waste away from landfill – and there is a universal agreement that asbestos waste belongs at landfill, then Governments policy should be structured to keep the disposal cost of asbestos to a minimum. This Inquiry should highlight this problem issue back to State Governments for their rectification.
- Similarly State Governments should not be charging the waste levy on residues from recycling facilities (such as scrap metal, paper, cardboard etc). As waste levies increase in magnitude, the amount of the waste levy is generally greater than the cost of landfill. The application of a waste levy therefore penalises bona fide recycling facilities and is detrimental to the recycling of marginal products (for example modern fridges now contain more plastics, foams than metal). This Inquiry should highlight this problem issue back to State Governments for their rectification.
- The powers of Local Councils to mandate (late start) collection times without proper risk assessments is a major problem for the transport of waste & recycling. The safest times to collect waste are early (no traffic, no school children, less pedestrians, fewer parked cars etc) – and State & Federal Governments need to legislate and remove the power of Local Government to mandate collection times (most often as a push by an Elected Councillor who has received minor noise complaints from Residents). The Waste & Recycling industry takes this opportunity to make it very clear to Government – *“that the safe interests of Waste Industry Workers and the Members of the Public should trump a minor noise complaint over early hour collection*

times". Any failure by Government to assist industry in addressing this concern is likely to lead to more injuries, more accidents and more fatalities.

d. The economic, environmental and social benefits and costs of such strategies;

- Broadly speaking there will be significant economic, environmental and social benefits across the country if we invest more into the training of employees and contractors engaged in the Industry.

e. Policy priorities to maximise the efficiency and efficacy of efforts to reduce, recover or reuse waste from different waste streams; and

- The waste & recycling industry's greatest challenge is in convincing Government that a broad range of solutions will be required to best address our future waste management needs. Whilst emerging technologies will present beneficial recovery options, Government should not totally discount the need for the traditional methods of disposal.
- It should be noted that the newer waste treatment technologies remain in part unproven and even so will more than likely require a landfill component.
- It should also be noted that whilst recovery, recycle and reuse are the modern buzz words – for the foreseeable future we have every reason to continue to anticipate that collection and disposal will continue to form an important part of the waste management equation.

f. Consideration of the Drink Container Recycling Bill 2008.

- This Drink Container Recycling ("DCR") Bill should be placed on hold until a full and proper cost/benefit analysis is undertaken detailing all aspects of establishing an Australia-wide network of collection and handling systems for drop-off centres. If this analysis fails to provide a net economic benefit (especially in rural areas and smaller towns) then this proposal should be re-examined at a future point in time.
- In any event, consideration of DCR should only be seen as an adjunct to existing domestic kerbside systems which have already proven to have engaged community support and have in fact positively changed household waste management behaviour over the past twenty or so years. Any move away from these systems would be detrimental to the overall environmental benefits gained to date.
- It may be a better proposition to focus our efforts on better community education for recycling and more enforcement/penalties for polluters.

Thank you for the opportunity of providing this brief submission. Should there be an opportunity for us to attend a public hearing session we will elaborate on the above.

Yours faithfully,

Tony Khoury
Executive Director

