



12 May 2009

Waste Policy Taskforce
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
CANBERRA, ACT 2601
By email: wastepolicy@environment.gov.au

Dear Sir/Madam,

Re: A National Waste Policy- Consultation Paper

Thank you for the opportunity to contribute to this consultation. The Southern Sydney Regional Organisation of Councils (SSROC) supports the establishment of a National Waste Policy, and offers the following comments on the draft statement.

1. Triple Bottom line values should be applied to waste
 - a) Social and environmental issues need to be of equal consideration to the financial values currently placed on waste.
 - b) Avoidance should be the top priority in the effort to reduce the amount of waste going to landfill. Although, with the current emphasis on diversion from landfill, there is an incentive to continue to generate waste since avoidance could reduce the “diverted” percentage of the waste stream.
2. National Leadership is essential, with consistency across States and Territories
 - a) Preventing the “export” of waste from one State to be landfilled or processed elsewhere.
 - b) Giving consistency to service providers through the adherence of the same regulations in different places.
 - c) Developing consistent responsibilities and management of the waste streams that are not municipal waste. There is such variation, or it is not clearly identified who is responsible for the management and reduction of Construction and Demolition waste, and Commercial and Industrial waste.
 - d) Councils require assistance with the identification of possible sites and location of waste disposal. This includes a consistent message as to the role of Alternate Waste Technologies and guidelines to these technologies.

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- e) In relation to organic waste and its reprocessing, it is important for the Federal government to assist the States and industry with market development for the products that are produced through organics reprocessing. There will be no benefit to keeping organics waste separate from the rest of the waste stream, if these markets are not viable.

3. Classification of waste, especially where it has cost implications, needs to be responsive to changing conditions and technologies.

- a) Changing the classification of waste to landfill in order to encourage some form of processing before disposal. For example:
- The inert material that is a residual from the AWT process, used only as daily cover for the landfill, but being subject to the landfill levy as it is waste to landfill. Further incentive could be given to the AWT process by reclassifying the inert material as not material going to landfill
 - Material going to bioreactor landfills or landfills where emissions are effectively managed, could attract a reduced levy to encourage improvements.
- b) The term “waste” should only be used of material that has zero value at this time. This does not include everything that the community places in the residual garbage bin. In the context of resource stewardship, we should be aiming towards zero waste, although at the present time it may be unachievable.

4. Extended Producers Responsibility and Resource Stewardship

- a) The policy should allow for incentives and penalties in relation to extended producer responsibility (EPR). This should only come into play if the encouragement to bring about change in this area does not work. The carrot and the stick approach has to be the next logical step in the EPR area.
- b) Supplier and consumers to be encouraged to “close the loop”. Giving the packaging of the product some value and ensuring the recycling process maintains economic relevance.
- c) Councils continue to shoulder most of the burden when it comes to products such as e-waste. The correct disposal of these items is subject to Council budgets and grant funding. These vary considerable from area to area. The incentive/penalty approach to e-waste manufacturers, distributors etc would greatly assist in achieving EPR for this ever-growing waste stream.

5. Comprehensive strategy needs to cover all types of waste.

The policy needs to cover all waste which includes the more difficult to deal with, such as liquid waste, radioactive waste, and household hazardous waste such as smoke alarms, batteries etc.

SSROC appreciates the opportunity to comment on the National Waste Policy, and hopes that the above comments will be useful to the next revision and the development of supporting guidelines.

Yours sincerely,



David Lewis
General Manager
Southern Sydney Regional Organisation of Councils