



29 July 2009

Waste Policy Task Force  
Department of Environment, Water, Heritage and the Arts  
GPO Box 787  
CANBERRA ACT 2601  
by email: [wastepolicy@environment.gov.au](mailto:wastepolicy@environment.gov.au)

Dear Sir/Madam,

**Re: Submission on the Draft National Waste Policy**

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Thank you for the opportunity to provide comment of the Draft National Waste Policy Framework. SSROC supports the development of a national approach, and is broadly supportive of the draft framework set out in the Discussion Paper. However, there are a few aspects where the framework could be improved which are set out below. These suggestions are in addition to our previous submission dated 12 May 2009.

**1. Vision and Targets**

The vision put forward in section 6.3 of the discussion paper is a good set of characteristics to target by 2020. A much more concise statement would much more effectively convey what the policy framework aims to achieve. It would also provide participants in the industry with a fundamental end-point to which all decision-making should be aligned. For example “zero waste” could be the vision.

SSROC would prefer that targets should then be set in a way that enables Councils to work steadily along a path towards achieving the vision in the long-term: targets should be achievable in the short- and medium-term – whereas the vision might only be achievable in the long-term. Target-setting can be valuable used in this way: the NSW target of 66% diversion by 2014 has been useful by providing a specific level for Councils to aim at and for service providers to focus on delivering. With recent improvements in technology a higher target with a longer time-frame might now be appropriate, moving the nation towards the vision of zero waste.

**2. Taking Responsibility – the Need to Change Attitudes to Resource Stewardship**

The policy framework’s focus on Product Stewardship is welcome; this and the related notion of Extended Producer Responsibility are of vital importance. It gives encouragement to manufacturers, retailers and consumers to “close the loop”, and is key to making the stewardship of resources practicable.

However this addresses only one aspect of the broader idea of resource stewardship, which is a fundamental push to change culture and attitudes, to appreciate that resources are finite and therefore of value. Resource stewardship directly opposes the increasing acceptability of built-in obsolescence and “disposable” goods and packaging: it is deep and significant shift from the mindset

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that deems acceptable the disposal of items that are perceived as valueless by the current consumer at a particular point in time.

Changing attitudes and culture in this way is much more difficult than introducing EPR schemes, although they have a major part to play. Making resource stewardship the prevalent attitude must be the fundamental aim of the policy framework.

### **3. Market Arrangements - Building Infrastructure and Technologies**

There is a need for assistance in relation to building infrastructure and the technologies to process material. Guidelines and standards are important, but will be of little use without the infrastructure to deliver the processing required. The waste industry might be willing to invest in infrastructure to grow this market if there is a clear opportunity to profit from sufficient supply. However, any such investment plan requires suitably zoned and located land for the construction of waste processing plants. The importance of this issue is increased by the need to reduce transport costs, to minimise the traffic congestion caused by garbage trucks, and now also to minimise carbon pollution generated by transporting waste. In densely populated areas such as southern Sydney such sites are in short supply. The policy framework must address this issue, as free market forces will not solve this problem.

### **4. Improving the Market - consolidated feed-stock supply**

Consolidated supply of feed-stock also contributes to creating a solid investment proposition for the waste industry. The building of the infrastructure needed to process waste and recycling is unlikely to be a viable proposition for the waste-stream generated by a single Council: individual Councils seeking waste disposal services offer only incremental increases to the feedstock of a waste-processing plant. A larger supply, such as might be obtained through a grouping of Councils, might present the quantity necessary to create the right market conditions for investment in a new plant and for new players to enter the market. The Waste Policy Framework should therefore facilitate and encourage grouping of Councils, in order to make building facilities a viable and commercially competitive option.

SSROC appreciates the opportunity to contribute to the development of 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,



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