

Submission to the Inquiry into Waste Generation and Resource Efficiency

This submission has been compiled by volunteer Earth Carers. Earth Carers is a community-based program in Perth, supported by the Western Metropolitan Regional Council, which takes practical information about reducing waste to householders, schools and businesses. Through regular displays, talks and workshops, Earth Carers encourage wider community understanding of waste issues, promote the benefits of regarding potential waste as resources and offer free information and support to those wishing to adopt waste-saving habits.

Among its many out-reach activities, in September this year Earth Carers is having a month of events at different locations throughout Perth's Western suburbs to encourage and support retailers and shoppers to reduce plastic shopping bag use.

We would like submit the following comments in response to the draft Productivity Commission Waste Management report.

1. Limited focus on waste reduction

It is disappointing that only very few of the recommendations (or findings) in the Report address opportunities for reducing the ever expanding waste generation in Australia.

In the Report many criticisms are made of the existing and planned strategies and policies that are aimed at achieving waste reductions and increasing the recovery of waste. The Report is critical of nearly all of these strategies. For example the Commission is critical of: the application of the waste management hierarchy; landfill levies; waste minimisation targets; reduction of plastic shopping bags; product stewardship and extended producer responsibility. Many of these strategies are in place in countries across the world, and have continued support in these countries. It would be encouraging if the Report could provide analysis of positive things that could be done to overcome the identified failings of these strategies and policies to achieve waste reductions.

The main recommendation in the Report that provides a positive suggestion for reducing waste is Recommendation 8.3, which urges Governments to be more open to exploring the net benefits of Energy-From-Waste facilities. Recommendation 12.1 also relates to waste reduction, however we feel there is a need for some clarification of who the Commission defines as *users* of waste disposal. Is it all rate payers? Are some rate payers more responsible than others? Are industry groups who generate waste (such as through packaging) also users of waste disposal? It is not necessarily clear who the *users* of waste disposal are and we suggest that the responsibility for waste disposal is one that should be shared between producers and consumers.

Overall we would like to encourage the Commission to provide additional analysis of some positive and encouraging options to assist in a reduction in waste in Australia. This could include extending the evaluation of the existing strategies mentioned above that the commission has critiqued as being uneconomic options. In reading the report we felt that there was a tendency for the Commission to evaluate the benefits and costs of such policy options using the "extreme" scenario – eg total ban on plastic bags; zero waste targets; futility of recycling to protect old growth forests. We can understand that the Commission may have used the extreme cases because these appear in areas of waste policy. However, we would encourage the Commission to extend the analysis to different scenarios (simulations), and hence provide a more balanced evaluation of the existing policy options for reducing waste. For example, the marginal benefits of going to the extreme of removing the last plastic bag may well not make good policy sense, however a compromise may be justified, such as

supermarkets introducing an upfront charge for plastic bags at the counter. This would have the benefit of giving consumers the option of whether or not they want to pay for a plastic bag, or provide their own re-usable bag.

In the Recommendations made about market-based policy we would like to encourage the Commission to explore more options for engaging industry in reducing waste (e.g. through reducing packaging). Could taxes, subsidies, and ‘green’ certification schemes have a role to play in encouraging industry to reduce waste generation through reduced levels of packaging? In other areas of environmental management market-based instruments are getting a substantial amount of attention, and therefore it is surprising that the Commission’s report only gave limited attention to the opportunities for market-based instruments to encourage innovative and progressive responses from industry to meet the growing consumer concerns about waste generation and disposal.

As a final point on the matter of waste reduction, we felt that the role of individual households and small community groups was overlooked in the Report. An important component of the volunteer work we do in Earth Carers involves providing information and education on composting and worm farming options for household green waste and food scraps. Apart from the benefits of taking this waste out of landfill, there are some great benefits that arise from turning household ‘waste’ into a resource that can be used to improve the organic matter in soils for growing food and ornamental plants. Composting and worm farming can also have other intangible, yet significant, benefits in life-style and personal satisfaction as well as an impact on attitudes and behaviour relating to waste generally.

2. Leadership on waste generation

We are concerned with a lack of leadership displayed in the report for moving towards environmentally responsible consumer and producer choices with regard to waste generation and disposal. We can understand the Commission’s mandate is to focus on evaluating economic benefits and costs but we consider the report to be unrealistically narrow and lacking in initiative and preparedness to embrace an alternative future where natural and human-made resources are respected by everyone – irrespective of how ‘cheap’ they are, or appear to be in the short term.

We feel very strongly that reduced consumption and reduced waste can make significant contributions to people’s well-being and happiness. Material consumption does not always lead to increased ‘welfare’ of individuals and the community as a whole. There appears to be an underlying assumption in the report (eg page 101, paragraph 4) that increased consumption is good, and decreased consumption by the current generation is bad. Naturally, this “equation” will vary across individuals, but to apply a blanket assumption jeopardizes the credibility, appropriateness, and accuracy of the policy recommendations arising from such analysis. We encourage the Commission to send out a positive message to challenge the assumption that profligate consumption is a “right” of current and future generations: living with less waste does not mean lowering standard of living.

For the Productivity Commission to promote landfill as a satisfactory repository for increasing amounts of waste from human activity would be considered by many to be retrograde. We do not support the argument that “best practice” landfill operations (where methane is produced, perhaps along with other ‘benefits’) have negligible costs until the market dictates otherwise through land and resource prices. The market may be efficient at expressing resource scarcity (such as for land or healthy environment), however, this is not the same as indicating the costs – to the community and the environment – of current rates of waste generation and disposal.

3. Evaluation of a ban on plastic shopping bags

We do not necessarily support a total ban on plastic bags as being necessary, practical or achievable. However, we support a strong call for more responsible use of resources, including plastic bags. We do not support the position proposed in the Report that the use of 6 billion plastic bags (and expanding) in Australia that ultimately end up in landfill or as litter is an acceptable or responsible use of landfill options for waste disposal or protection of the natural environment.

We find the Commission's arguments about the cost to the consumer of reduced plastic bags totally unconvincing (outlined on pg. 144-145).

There has been a good degree of community acceptance, across the board, with alternatives to plastic bags. The community really has accepted carry bags – why go backwards?

We encourage the Commission to incorporate an analysis of the pros and cons of supermarkets introducing charges for plastic bags. In Ireland consumers have adapted very quickly to charges. They have not stopped shopping because they are being charged for bags; consumers have simply changed their behaviour and carry their shopping home in re-usable shopping bags.

In concluding our response to the draft document, we do not argue that waste reduction options should only focus on plastic bags, but rather consider that plastic bags are clearly an iconic representation of a habitual and learned preparedness to toss. We urge the Productivity Commission to assume a position of forward-thinking, innovative leadership on this issue. We know we can do better – so what are we waiting for?