

Our Ref: BR.DC
Contact: Mr Barry Ryan
Telephone: 4732 7503

21 August 2006

Inquiry into Waste Generation
and Resource Efficiency
Productivity Commission
Locked Bag 2
COLLINS STREET EAST MELBOURNE 8003

Dear Sir/Madam

Waste Generation and Resource Efficiency

I refer to the Productivity Commission's public enquiry into waste generation and resource efficiency and appreciate the extension of time granted to Penrith Council to further consider this draft report.

A report was prepared for and received by Penrith Council on the Commission's draft report into waste generation and resource efficiency and Council resolved to make a submission to yourselves in regards to the findings and outcomes of this draft report.

It is acknowledged that there are several positives identified in the draft report including the recognition that landfill, as a means of waste disposal, is not inappropriate in all circumstances, and the recognition that there is insufficient accurate reporting data on waste disposal and recycling and more work needs to be done in this area. However, there are several issues where Council strongly disagrees with the findings and considerations by the Commission.

On page XXIX the Commission comments negatively on both the waste management hierarchy and on the issue of zero waste. These comments appear to be an indication that the Commission has taken a narrow approach in the examination of waste management and focused on economic considerations rather than a holistic view, which includes the education of consumers.

Also, by indicating that zero waste is not feasible, the report ignores the community drive that may be gained by heading towards such a target. By dismissing the concept of a goal of zero waste, the potential to achieve more sustainable outcomes than would have been achieved with a lesser target has been lost.

The Commission's comments broadly on the role of Local Government in waste management and concludes that a regional approach would be more effective.

It appears from the commentary that the Commission has considered all activities that may be allocated to Local Government in total. In NSW the State Government, in urban areas, has already assumed a significant proportion of these functions, while Councils retain collection and some planning responsibilities. The Commission seems to be unaware of instances where this model has been highly effective. Penrith Council has maintained a waste management service that is highly regarded by the community and cost effective in comparison to industry standards.

A general theme of the report is that decisions on waste management and recycling should be made case by case, based on actual benefits rather than applying across the broad policy which implicitly assumes all situations are similar. The Commission should consider that Local Government is in the best position to do this.

Removing the responsibility of waste collection from Local Government and transferring it to a state or regional level would result in a loss of local knowledge. Resolving and maintaining customer service issues by organisations that are detached from the local environment would therefore be a more difficult task.

The Commission does not appear to have considered the efficiencies that flow from having waste collection managed in the same organisation as that controlling land use and development. Local Councils already have databases necessary for their rating and land management functions, which facilitate domestic waste billing. If this was in a different organisation then an amount of duplication is unavoidable. The co-location of these functions also has a public health outcome. While all new homeowners will arrange electricity and water for their home, there is not the same certainty that they will automatically choose to pay for waste management. Putting waste in someone else's bin, onsite incineration and dumping are possibilities that are likely to increase if Local Councils do not manage waste collection, particularly if the system moves further towards a user pays philosophy.

Most outcomes are qualified by terms such as "probable" and "likely", and methods of analysis are based on an "either/or" approach, suggesting that there does not appear to be any real confidence in these statements.

Whilst the report comments on triple bottom line issues, it appears to have a definite leaning towards the economic aspects at the expense of the environmental and social benefits of the implementation of waste avoidance practices. Perhaps a review of the report from a higher-level sustainability body such as the International Council for Local Environmental Initiatives (ICLEI) would be appropriate.

The document, at times, is ambiguous. Council Officers reading the Productivity Commission Draft Report have come to different conclusions about what they are saying in certain sections. That flows from the reader's assumptions about whether terms are being used in a precise or a casual way and from the reader's area of expertise. For instance, on page 33 "Local Government" is contrast against "Regional Bodies" so the reader has to form an opinion about what the Commission means by these terms. The

Commission should be requested to be more precise in what it is saying and to ensure that correct terminology is being used.

It is requested that the above comments be considered in the Commission's review of the draft report.

Yours faithfully,

Barry Ryan
Waste & Community Protection Manager