

Our Ref:

Enquiries: John Falzon
(08) 8363 0100

5 July 2006

Inquiry into Waste Generation and Resource Efficiency
Productivity Commission
Locked Bag 2, Collins Street East
MELBOURNE VIC 8003

By Email: waste@pc.gov.au

Dear Sir / Madam,

Waste Generation and Resource Efficiency Enquiry

Thank you for the opportunity to provide feedback to the Productivity Commission's Draft Report on Waste Management in Australia (May 2006). With reference to the draft report, we provide the following brief comments:

The authors and researchers of the report are to be commended for taking the emotion out of waste issues and for providing sound conclusions and recommendations. The report is the closest to "getting it right" of all the waste papers that we have reviewed in more than 20 years of involvement in the landfill gas / renewable energy industry.

LMS agree that greenhouse gas externalities from landfill should only be addressed within a broad national response to greenhouse abatement. Having the opportunity to be involved in greenhouse issues at landfill sites in every state of Australia, LMS confirm the difficulties in coordinating a common approach to greenhouse externalities and would be better served if there was a shared directive with a mutual goal. Greenhouse issues have far reaching implications, which are much greater than those currently managed under waste management regulations. These include economic implications for the nation, compliance with Kyoto targets, and also Australia's ability to participate in international greenhouse schemes considering over \$15 billion worth of carbon credits were traded on the international Kyoto-based market last year.

LMS believes that zero waste is neither technically, nor economically sensible, is not achievable and therefore not credible. Whilst fully in support of economic recycling initiatives, and sustainable management of waste and resources, there will always be a need for landfills to exist in some capacity.

LMS have always disputed the fact the Alternative Waste Treatment technologies claim to reduce methane emissions by avoiding waste to landfill. The methane emissions produced as a result of waste disposal in modern landfills is collected and converted into viable renewable energy or combusted with clean burn proven technology.

Additionally LMS can claim much higher extraction efficiencies than the 40 to 75% claimed in the report. LMS has developed its own technology to capture landfill gas and has demonstrated to have significantly higher extraction efficiencies that are supported by sub-surface and perimeter monitoring showing zero or minimal release of gases.

LMS appreciate the opportunity to provide input on this important issue and again commend the Australian Government for instigating a review of waste generation and resource efficiency in Australia.

Please don't hesitate to contact me should you require any further information or clarification.

Yours sincerely,

MANAGING DIRECTOR
John Falzon
