



**Waste Management Association of Australia
(Tasmanian Branch)**

Monday, February 06, 2006

Dear Delwyn,

Waste Management is presently forging ahead in Tasmania, largely driven by the efforts of forward thinking operators and the Association its self, change will continue to occur for the better as long as the Association continues to efficiently and effectively address opportunities for such engagement with stakeholders

The Executive has been lobbying successfully for the last six months to forge new relationships with decision makers, setting out to achieve increased capital investment, particularly in waste management infrastructure and new job creation opportunities

The Waste Management Association of Australia (Tasmanian Branch) is now regarded as the peak body in Tasmania, and our submission to the Inquiry into Waste Generation and Resource Efficiency Productivity Commission is an out come of a range of consultative forums and workshops representing our diverse membership

Regards,

Brad Mashman

President WMAA (Tas)

Director RECOVERY (Tas) Pty Ltd

**WASTE MANAGEMENT
ASSOCIATION OF AUSTRALIA**

Tasmanian Branch

**Submission to the Inquiry into Waste Generation
and Resource Efficiency Productivity Commission**

1st January 2006

Table of Contents

Introduction.....	3
Whether Tasmania Should Implement Container Deposit Legislation.....	5
Background.....	5
Current Status.....	6
Container Deposit Legislation or Extended Product Responsibility 2005 and Beyond .	6
Conclusion	8
The White report concluded that:	8
Impediments and Incentives to Reduce the Generation of Waste and in Dealing with Residues	10
Introduction.....	11
1. National Packaging Covenant (NPC)	11
2. Changing Standards/Processes/Approaches	11
3. Hazardous (Controlled) Waste.....	11
4. Education/Marketing.....	11
5. Targets, Performance Indicators and Monitoring	11
6. Resource Recovery	12
7. Producer Pays Mechanism.....	12
Present Methods of Waste Management in Tasmania Including Regional Waste Management Strategies	14
Projected Methods of Waste Management in Tasmania compared to World's Best Practice.....	18
The Development of a Future Waste Management Strategy.....	20
Measures to Educate and Involve the Community and Local Government in Future Strategy development and implementation	21
Education of Small to Medium size Business.....	22
Other Matters.....	23
Structure of the Department of Primary Industry Water and Environment.....	23
True Cost Recovery at Disposal Facilities.....	23
Industry Waste Minimisation and Diversion for Reuse.....	25
Conclusion	25
References.....	27
Attachments	27
Additional Waste Management Reports and Guidelines	28

INTRODUCTION

This submission is in response to the Inquiry into Waste Generation and Resource Efficiency Productivity Commission terms of reference to investigate and make recommendations to the Government concerning domestic, industrial and hazardous (controlled) waste management.

The membership of the Tasmanian branch of the Association is made up of a diverse group representing different sectors of the waste management and resource recovery industry. The diversity of group is its greatest strength as it allows the debate to broaden into many areas without tunnel vision prevailing. This same strength however, limits the Associations' capacity to achieve unanimous consensus on all the issues. Not all members support some sections of this response, however the Association feels it would be irresponsible not to raise the more contentious issues to allow debate to proceed in the broader community.

The Association gathered information from its members to put forward what it believes is a balanced view on each item. A meeting was called on Monday, October 18 of the executive, committee members and general members of the Association, to discuss the issues in preparation for this submission.

Following the meeting of the Association members a draft document was prepared and forwarded to all members for comment and to allow for any additional material to be included into the submission.

The Waste Management Association of Australia (WMMA) is focussed on waste related issues and is recognised as the peak industry body for waste management issues in Australia.

Our membership is made up of representatives from State and Local Government; waste management operators and companies involved in all segments of the market; individuals working as consultants and individuals with a genuine interest in waste related issues.

The Association congratulates the Government for taking this initiative to call for public comment on what it knows is a fundamental issue for the Tasmanian community, business sector and the environment. The WMAA's focus is to look for solutions, which will deliver sustainable economic and environmental outcomes for the long term and benefit the community as a whole.

WHETHER TASMANIA SHOULD IMPLEMENT CONTAINER DEPOSIT LEGISLATION

Background

In Tasmania in the 1960's and 70's a refillable bottle program was operated on a voluntary basis by some organisations. This has been seen as a form of container deposit system. When individuals discuss their personal experience with this philosophy on litter reduction they will often recall fond memories, particularly as children, of returning beverage containers to allow them to make a purchase of goods or services.

The Beverage Industry was proactive in funding the initial trials to introduce kerbside collection via the Tasmanian Research and Litter Awareness Council. This was a jointly funded program with the State Government at the time. The trial program was conducted with the Glenorchy City, Derwent Valley and Brighton Councils. Once this initial funding was exhausted the beverage industry moved to provide a promotional program for kerbside recycling. The ongoing finance for kerbside collection of recyclables has remained with ratepayers / Local Government.

In August 1999 the National Packaging Covenant (NPC) was adopted, which is a self-regulatory agreement between industries involved in the packaging chain, the Federal and State Governments, Territories (excluding the Northern Territory), a few Local Government Authorities and Regional Groups. The funding commitment lasted for three years of the five-year agreement and required a dollar for dollar commitment from Government, before participants could apply for a grant.

The NPC was set up to assist with managing waste produced by the packaging industry. The two basic principles under which the agreement functions are;

- Shared responsibility and
- Product stewardship across the packaging chain from raw material suppliers to retailers.

Current Status

In August 2004 the NPC agreement expired allowing Industry, Government at all levels and the community the opportunity to evaluate the success or otherwise of the NPC. Funding grants from the NPC in Tasmania have been provided to the Southern Waste Strategy Authority (SWSA). The southern region of the state has benefited from this additional funding, which amongst other initiatives has been used to promote recycling programs within schools and public events. The SWSA has received \$110k of a budget of \$435k over three years. The funding available tends to highlight the lack of commitment to the NPC due in part to the stringent criteria, which applicants are, required to meet to receive a grant.

The Association considers that if Tasmania is to seriously support the recovery of packaging material from the waste stream then it should examine the level of funding in relation to the revenue from sales on beverage products. In the state over the past five years the fresh milk marketers have sold approximately \$230 million of product, this does not take into account the product sold by Coca Cola or other beverage producers. Based on the fresh milk sales alone the NPC contribution to Tasmanian (SWSA) towards their \$435k is less than 0.2 of 1%. This is not a significant amount of money when compared to total revenue generated by all sectors of the beverage industry. It could be argued that more funding could be committed from this sector alone. If that funding is not to be forthcoming than other options such as CDL (as canvassed below) warrant consideration.

Container Deposit Legislation or Extended Product Responsibility 2005 and Beyond

Dr Stuart White, University of Technology Sydney, wrote a comprehensive report, namely the 'Independent Review of Container Deposit Legislation in New South Wales', for the Hon Bob Debus MP, Minister for Environment, New South Wales into CDL. The report, referred to as the "White Report", not only deals with CDL for beverage containers but also discusses the broader principal of "Extended Producer Responsibility" (EPR).

The concept of EPR can be applied to all waste streams as it focuses on a preventative approach or a cleaner production philosophy to waste management, rather than only dealing with the issues post consumer stage. The EPR scheme passes onto a producer the physical and or financial responsibility for the whole of the product life cycle including the post consumer stage.

The two key features of EPR are:

- “The full or partial shifting upstream of responsibility from municipalities to the producer and”
- “It provides the incentive for producers to take into account the environmental considerations in the design of products (OECD, 2000)” (White et al 2001 pg. 1 - 1).

Internationally products covered by EPR schemes include:

- Waste Packaging
- Waste Oils
- Batteries
- Hazardous Waste
- Tyres
- Carpet
- Vehicles
- Electric and Electronic equipment and
- Refrigerators

If the Federal and/or State Government introduced EPR as Legislation it would force the packaging and manufacturing industries to look for more sustainable solutions when dealing with their product.

EPR is recognised internationally and operates under two methodologies, “voluntary” or “mandatory”. In 2001 when the White Report was completed, there were two voluntary

schemes in the US and two in Canada, the voluntary schemes involved some electronic and vehicle components, but the EPR Legislation (mandatory) applied to beverage containers. The best results from EPR legislation have been achieved in Northern Europe in Germany, Denmark and Sweden. The US and Canada have also adopted the EPR philosophy along with Japan, Taiwan, Belgium, Korea and the Netherlands.

In Western Canada oil containers are successfully recovered through an Environmental Handling Charge (EHC) via a levy applied at the point of sale. This system is totally self-funding and provides opportunities for recovery of oil along with the recovery of the container (Alberta Used Oil Association).

Conclusion

The White report concluded that:

“The potential benefits of, and level of community support for, significantly increased recovery of used containers is such that action should be taken to ensure that the recovery rates are raised to a more economically optimal level based on the benefits to society. The current mechanisms for container collection and recycling are unlikely to achieve these rates and the current targets in relevant Industry Waste Reduction Plans are well below these optimum levels” (White et al 2001 p iii).

The White report was the first totally independent report written on CDL in Australia. There have been several other reports written and funded by the beverage industry. As with any industry it is imperative that there be transparency in these matters. The WMAA does not consider it essential that we commission an independent report of our own, because the White report clearly demonstrates the benefits to other societies across the world of CDL and EPR.

The Association considers the South Australian model of CDL has assisted in the recovery of beverage containers and the introduction of kerbside collection has complemented this methodology allowing for additional opportunities for waste minimisation and litter reduction. A multi-pronged approach has been adopted. The argument currently used against CDL is that it will have a negative impact on the existing kerbside collection of recyclables and increase local government costs. However, there

is not any conclusive **independent** evidence to support this argument. In a report titled “Impacts of Container Deposit Legislation on NSW Recycling and Litter Management Programs”, prepared by the Centre 4 Environmental Solutions Pty Ltd (C4ES 2000 P/L), it states:

“Traditional CDL programs report beverage container recovery rates of 75 to 85% and are therefore viewed by supporters as being environmentally preferable to non-CDL programs. CDL would inevitably result in some additional recovery of containers currently going to landfill” (C4ES 2000 P/L p viii).

CDL can clearly work as is demonstrated by methods adopted in Nova Scotia, Canada. The Nova Scotia waste management strategy is internationally recognised. It supports CDL and extended producer responsibility or product stewardship. Nova Scotia has achieved 50% reduction of waste to landfill within 4 years, achieved in part through **two** of the Resource Recovery Fund Board’s (RRFB) five mandates as follows:

- Develop & Operate a Deposit-refund system for Beverage Containers’ and
- Develop & Implement Voluntary Industry Stewardship Agreements.’ Dr. Paul Connet - Report Attached).

In Tasmania the following systems are adopted to assist with the capture of packaging and items other than beverage containers:

- The resource recovery outlets currently operating from Tasmanian landfills and waste transfer stations are an excellent example of financially viable reuse of post-consumer product. Resource recovery centres require greater support in developing more markets for post-consumer product – assisting producers to meet their EPR obligations, assisting waste authorities to achieve waste minimisation targets, supporting local job creation, and making products available to the community at affordable prices.
- The agricultural chemical industry has acted responsibly in that it collects a levy/deposit for containers at point of purchase and this supports a national “Drum Muster’ program.

While Drum Muster is a successful program catering for one sector of the market, there are many other containers generated from other product suppliers (e.g. oil containers, drums, solvents and cleaning products), which do not attract a levy/deposit and there are no systems or incentives in place for these to be recovered from the waste stream. It should also be noted that some of these containers have residues that are potentially hazardous, yet disposal to landfill is the norm.

- Tyres also have a levy/deposit paid at the point of purchase.

Despite the collection of a levy, tyres continue to be dumped at landfills (after being cut into pieces) instead of being processed for beneficial reuse (e.g. crumbed for energy or product manufacture).

In the Association's view and based on the White report, container deposit legislation and extended producer responsibility have a significant role to play in the future. These principles will assist litter reduction (vital to Tasmania's image), waste minimisation, impact on waste to landfill and increased product recovery rates. While beverage containers have been a good starting point to enrol the community in the practice of recycling, it is the Association's view that a broader scope (i.e. all other packaging and products) needs to be considered in terms of CDL/EPR.

If Tasmania is willing to really impact on waste avoidance, reduction, reuse and recycling and ultimately significantly reduce disposal to landfill, then CDL/EPR have to be considered in a global sense, giving due account to international experience from other developed countries. The Nova Scotia experience is a prime example to consider as a potential future model to be adopted by the state because it is not dissimilar to the Tasmanian circumstances.

IMPEDIMENTS AND INCENTIVES TO REDUCE THE GENERATION OF WASTE AND IN DEALING WITH RESIDUES

Introduction

In October 2000 the Premiers' Local Government Council (PLGC) signed the Statewide Partnership Agreement on Waste Management and resolved to form a committee and prepare terms of reference, for what was known as the Tasmanian Waste Advisory Committee (TWAC). TWAC was required to meet the following objectives and report back to the PLGC in respect to seven key waste management areas:

1. National Packaging Covenant (NPC)

Objective: Committee to identify the issues, options, opportunities and obligations under the NPC, and to make recommendations regarding the process to implement the NPC in Tasmania. (DRAFT TWAC Final Report).

2. Changing Standards/Processes/Approaches

Objective: State Government will identify its current practices and procedures for setting waste management standards and present this to the Committee for its consideration. (DRAFT TWAC Final Report).

3. Hazardous (Controlled) Waste

Objective: Committee to examine implementation options for hazardous waste management measures arising from the Waste Management Strategy. (DRAFT TWAC Final Report).

4. Education/Marketing

Objective: Committee to clarify and make recommendations regarding the coordination of State, regional bodies and individual councils in planning education and marketing programs. (DRAFT TWAC Final Report).

5. Targets, Performance Indicators and Monitoring

Objective: Committee to examine options, including costs and benefits, and make recommendations regarding establishing uniform data collection systems to support performance indicators to measure progress towards targets. (DRAFT TWAC Final Report).

6. Resource Recovery

Objective: Committee to identify options for promoting market development and means of increasing the level of resource recovery (including reuse and recycling) in Tasmania. (DRAFT TWAC Final Report).

7. Producer Pays Mechanism

Objective: Committee to identify issues and options for a producer pays mechanism to assist waste management in Tasmania (DRAFT TWAC Final Report).

Independently of the deliberations of the TWAC, the State Government also established the Environmental Industries Council (EIC) in August 2000 as a response to the Environmental Industries Audit carried out by the Department Of State Development in 1999.

The objectives of the EIC were as follows;

The role of Government policy and other initiatives to:

- Maintain and strengthen the environmental credibility of Tasmania and those of its industries that are dependent on this credibility.
- Minimise the potential for Government, industry and the community activity to damage this credibility or put it at risk.

Strategies that expand capability within the environmental industry to;

- Support marketing initiatives of the State's environmentally dependent industries.
- Support the improvement of waste management practice within Tasmania.
- Market the Environmental Industries' capability outside the state (DRAFT REPORT Tasmanian Environmental Industries Council Industry Plan 2003 prepared by The Department of Economic Development DED).

The reports from TWAC and EIC both came to similar conclusions and Recognised the impediments to reducing waste in Tasmania include;

- Subsidised disposal costs at Municipal Landfills, which encourage a “waste approach” as opposed to a reuse and or recycle approach.
- A lack of funding from State and Local Government to finance best practice disposal methods.
- True cost recovery for landfill operation not adhered to by Local Government Landfills as identified by the Auditor Generals Report 1993.
- A lack of economic incentive to encourage waste reduction and cleaner production.
- The inherent cost disadvantages of a low population density.
- Economic disincentives of using recycled materials.
- Recycling collection industry is a price taker, due mainly to the limited competition in the domestic market for the purchase of product. Also the industry is reliant on the freight equalisation scheme.
- Lack of political will and or tighter regulations to encourage or enforce greater resource separation or materials for processing.

The Association agrees with all of the above findings and has identified others that may also be worthy of consideration, namely:

- Lack of infrastructure for on-the-ground implementation of waste minimisation strategies i.e. availability statewide of waste receiveal points designed to optimise resource recovery goals i.e. maximum reuse, recycling, & reprocessing.
- The conflict of interest Local Government has to deal with, when reviewing landfill charges, to allow for true cost recovery, as opposed to satisfying the potential political backlash from ratepayers when fees and charges are increased.
- An absence of key treatment and disposal facilities for a controlled waste such as Clinical and Quarantine waste.
- The limited access to a specialised liquid waste treatment facility for controlled liquid wastes (e.g. trade wastes, grease trap and wash waters).

- The desirability of encouraging cleaner production methodologies that would assist in dealing with waste at the front end (i.e. at source).
- Financial and regulatory incentives for industry to divert recoverables such as green and organic waste to reuse instead of the low cost disposal option of landfill.
- The need for State leadership as the regional approach is disjointed. The Northern Region appears totally dependent on the Launceston City Council being a part of the proposed Authority; without their input the regional approach is not sustainable in the short, medium or long term.

The EIC Draft report clearly states all the incentives and benefits for Tasmania adopting a best practice waste management strategy. It discusses in depth the benefits of being able to market Tasmania's "CLEAN GREEN IMAGE". The Department of Economic Development has outlined the economic benefits to making the "CLEAN GREEN REALITY" and building sustainable environmental industries on that basis.

To provide an example, the agricultural industry requires access to a fully compliant, best practice quarantine waste handling facility, which will reduce the risk of disease in animals and plants entering the State undetected.

For the waste management and environmental industry it allows opportunities for capital investment and additional jobs providing services to facilitate waste diversion, reuse, treatment and disposal. If manufacturing industries were provided with incentives for waste diversion and sanctions for non-compliance with waste reduction targets manufactures would have the confidence to invest in innovative and sustainable methods for reuse, recycling, treatment and disposal of wastes.

PRESENT METHODS OF WASTE MANAGEMENT IN TASMANIA INCLUDING REGIONAL WASTE MANAGEMENT STRATEGIES

The Association recognises that the current methods of waste management in the State have improved significantly over the past ten years. Several small rural landfills have been rationalised, transfer stations established, resource recovery services established

in some areas and a strategic approach at regional levels has been developed or in the course of being developed.

For kerbside collection of refuse in Tasmania a predominate change to wheelie bin collections using a robotic arm side loading compaction trucks has outdated manual bag collection. Two obvious benefits include reduced personal injury and long term cost.

Kerbside collection of recyclables has demonstrated that waste minimisation and litter reduction can also be achieved if the systems are compatible. The meaning of compatible is, the size of the kerbside refuse bin compatible with that of the recycling bin/crate and the frequency of both are also matched accordingly.

While significant improvements have been made for kerbside collection, further gains could be made by Local Government if they were to collectively adopt a consistent bin size, collection frequency and tendering process. For example, economies of scale can be achieved if the utilisation of equipment can be maximised. Neighbouring municipalities could benefit by aligning themselves in tender process to increase critical mass and allow contractors to achieve greater and more efficient utilisation of equipment. The flow on in the future could include the automation of kerbside collection of recyclables, thereby reducing the risk of personal injury to operators (runners) and a potential reduction in cost once the capital equipment is in place. These systems are in common usage in other metropolitan areas in Australia.

A small number of Councils provide green waste collection services at kerbside. This in turn tends to reduce the number of self-haul deliveries to landfills/transfer stations and the level of load contamination. Alternatively self-haul deliveries of waste to landfills in Tasmania are still common. Self-haul loads of green waste to disposal sites is often contaminated, due mainly to a misunderstanding by the public that the product is sorted prior to processing. If green waste is contaminated with plastic, steel, sharps etc. it is no longer suitable to be used for premium purposes (e.g. public parks and areas) because of public liability issues. The only alternative available to landfills is to utilise the material for cover material and in some cases rehabilitation purposes. Green waste product could be value added if contamination levels were to be minimised, in turn assisting facilities away from burying this material.

Hard waste collection also allows for similar synergies and benefits including the reduction of self-hauliers at disposal facilities, improved diversion rates from landfill and better management of hazardous (controlled) wastes. Sale of recovered products from hard waste through expanded resource recovery outlets will provide employment opportunities and create community opportunities to purchase lower priced alternative materials.

In Victoria over one third of waste entering landfill is from the construction and demolition (C&D) sector and up to 75% could be reclaimed in the form of bricks, timber and fill material (Ecorecycle Victoria). Promoting the reduction of C&D waste is necessary to educate producers whilst incentives are required to stimulate the reuse of materials such as concrete in road base for example. At present the extraction of virgin materials out compete the reclamation and reuse of C&D materials and the end option for this material is landfill disposal. State and Federal Governments adopting a policy requiring a percentage of reuse material for road construction would drive change and innovation.

Disposal methods for controlled wastes as previously discussed require significant capital investment. The disposal of Clinical waste at landfill needs to be addressed in the short term; at this point in time the Port Latta facility is the only landfill receiving this waste for deep burial.

Training reduces the risk of personal injury and increases the skill level of participants in the industry. It also allows the industry to improve service levels via a quality system, which has ownership by staff, with a focus on customer service. Quality systems bring benchmarking, performance management with the flow on to improved waste diversion and waste minimisation.

The public are already engaged in kerbside recycling, litter reduction and protecting the environment.

The existing programs include for example:

- Clean Up Australia
- Tidy Towns
- Coast Care

- Surf Riders Foundation
- Don't Waste Tasmania. (This is also a National Program Don't Waste Australia)
- Great car body clean up
- Go Green
- Keep Australia Beautiful
- Cool Communities

The current regional approach tends to be disjointed and complicated at times due to competing political agendas within Local and State Government. The Southern Waste Strategy Authority (SWSA) to date despite its best efforts has been unable to achieve regional standardisation of collection methodologies, which from a practical point of view would make sound environmental and economic sense. Recently a southern regional council awarded a kerbside collection contract utilising the manual bag collection methodology. Such methodology is antiquated and well short of best practice from an OH&S perspective. If the waste management industry is to implement best practice as the benchmark it seems subsidies should be made available to allow small country Councils to adopt modern collection systems/methodologies.

Administration costs for three separate regional waste management authorities in Tasmania would be higher than those created by a single statewide organisation, due in the main to a duplication of administration and management staff. A CEO based in each region may overcome the potential for any one region to take on responsibility for the State, however could also result in somewhat of a status quo of the current situation.

The appointment of a State Waste Authority/Board with representatives from State and Local Government, industry and community groups drawn from across all regions may achieve a reduction in operating costs and equitable representation for decision making. The flow on from this management structure could well be a "State Waste Levy" applied to some or all waste streams/waste generators. To gain the confidence of local Government any "levy" collected would need to be administered in a manner guaranteed to ensure it is directed at programs related to waste management and not loss to consolidated revenue as has occurred in at least one mainland state. The revenue from such a levy could be utilised to address many of the issues referenced above, however

it needs to be agreed by the majority of stake holders if ownership is going to be passed onto the participants.

PROJECTED METHODS OF WASTE MANAGEMENT IN TASMANIA COMPARED TO WORLD'S BEST PRACTICE

As previously discussed there are a number of potential opportunities for the introduction of additional facilities for the treatment of waste and more specifically controlled waste. The clinical waste issue has been on the agenda for many years. The collection of clinical waste requires a licenced vehicle and certain protocols need to be followed when dealing with the waste to ensure the risk to the environment and of spreading disease is reduced.

The most up to date reference document for generators, transporters and treatment/disposal facilities in Australia and New Zealand is the *Industry Code of Practice for the Management of Clinical and Related Waste –4th Edition (2004)*. This document is a leading example of what can be accomplished through stakeholder consultation. It concisely sets the agenda for the adoption of better management and disposal practices for clinical and related wastes. The code should be adopted by the state government and used to update the outdated *Guidelines for the Management and Disposal of Medical Waste in Tasmania DPIWE Draft (May 1998)*. At a clinical waste workshop organised by the Association in July this year, it was obvious that medical staff/attendees were unaware or not particularly in favour of the existing disposal method – landfill without pre-treatment. They recognised the need to look for alternative methods of treatment and disposal and bring Tasmania inline with the first world. The *National Guidelines for Waste Management in the Health Care Industry (NHMRC, 1999)* that are referred to as a benchmark for landfill disposal by the Department of Public Health are out dated when compared to the aforementioned industry code. It is generally accepted in the developed world that landfilling of clinical waste without some form of prior treatment is applicable for very isolated areas and is not acceptable for large consistent volumes.

The Association would welcome the commissioning of an independent report to investigate the treatment and disposal options for clinical waste for Tasmania. The Association has allocated some funding toward this end, however additional external financial assistance would be required. Arguably the Association is better placed to act independently due to its relatively neutral position, whereas Government has some areas of conflict due to the volume of clinical waste it produces at its public hospitals and other state owned medical facilities.

THE DEVELOPMENT OF A FUTURE WASTE MANAGEMENT STRATEGY

The Environment Division of DPIWE prepared a discussion paper for waste management strategy titled "Towards a Waste Management Strategy" in 2000. The strategy had input from the waste management industry, manufacturing industry, State Government Departments, Local Government and community groups. It was released for public comment in March 2000 as there was to be an impact on Local Government in relation to the then proposed statewide levy. The State Government included waste management in the PLGC agreement.

The Association believes it could assist in coordinating and facilitating the development of a holistic Waste Management Strategy in a support role for the DPIWE. Because of its diverse membership the Association is suitably positioned to offer neutrality to the process of strategy development the likes of which has not been possible to date. It is suggested the key to providing a meaningful and sustainable strategy rests on promoting stakeholder confidence and providing adequate provision for the stakeholders input, which the Association believes it can accomplish.

MEASURES TO EDUCATE AND INVOLVE THE COMMUNITY AND LOCAL GOVERNMENT IN FUTURE STRATEGY DEVELOPMENT AND IMPLEMENTATION

Educating the community has been on the agenda of State Government as far back as the Auditor General's Report into Municipal Solid Waste Management 1993. It is a long and drawn out process, because together with education also comes the need for cultural change. Tasmanians seemingly are obsessed with driving to the "TIP" with the Ute loaded with rubbish on the weekend. Changing the culture needs to incorporate an educating all approach while focussing on young people from Kindergarten to University.

Preventing direct access to landfills by public/self-haulers and instead delivering this product to supervised waste transfer stations, where product segregation occurs involving the self-hauler. Incentives must be provided initially to enable maximum participation to the program, this may include free access to waste transfer stations if all waste is sorted for reuse or recycling.

As previously discussed there are several scheduled community waste/litter reduction days annually. To enable ownership of a campaign to increase reuse opportunities and reduce litter the community need to understand all the reasons for not taking the waste straight to the "Tip". We need a recycling / reuse "HERO" because Aussies love "HEROS".

Use of the relatively inexpensive (in comparison with other states) Tasmanian television medium together with Internet resources can provide further strategic options for delivering the interactive messages required.

The most effective method is the personal helper for the Sat/Sun TIP goer and the same strategy applied to public places like Malls and sporting venues.

In the past there have been anti litter campaigns, the most famous being "DO The Right Thing". This together with the latest campaign of "Don't Waste Tasmania", is about picking up and placing items in a rubbish bin, rather than placing in a recycling bin.

Nevertheless encouraging better management of litter is highly desirable and should continue to be encouraged as part of a more comprehensive strategic plan for improved waste management and resource recovery.

Public place recycling in the main has proven in the past to be a waste of time and effort due to the enormous problem of contamination. In most circumstances recyclables collected at public events are disposed of at landfill for that very reason. If we take Agfest as an example of a large public event over several days the opportunity to deliver the message to a large cross section of the community is perfect. Placing an attendant on site to direct waste into the appropriate bins whilst providing the public with information about “why” and “what” happens to the material after its been disposed of by the consumer would deliver very effective public education outcomes. Significant funding will be required to improve the performance of public place recycling as the coloured coded bin system has its limitations.

Education of Small to Medium size Business

Looking at Work Place Safe campaigns on safety in the work place is a classic example Of providing resources and delivering a very important message. The Association suggests there are potentially serious safety risks to the general public if waste is not effectively managed. As a community we cannot allow the dumping of toxic waste into a receptacle or landfill, believe that it's been 'dealt with' and hope it doesn't appear in a drinking water reservoir with potentially dire consequences to public health.

Education is the most sustainable method of introducing change, but it comes at a price, a fund is required to finance these activities. Other states including Victoria have a State Government waste levy, which finances programs for education across community and industry sectors.

The message is “don't waste it” but “maximise it” through recycling and reuse.

OTHER MATTERS

Structure of the Department of Primary Industry Water and Environment

The current structure of the Environment Division has been discussed formally and informally for many years. Regulation and enforcement go “hand in hand” and need to separate from the policy maker in any organisation because they come into conflict with each other at some stage.

We believe the challenge faced by individual officers of the department is to advise a client on policy on one occasion but then to be involved in a potential conflict situation when issuing an Environmental Protection Notice (EPN) on the next.

The underlying problem is funding and once again an option to assist is the introduction of some form of a State Government waste levy managed by an appropriate Authority, which is committed 100% to waste and resource recovery management and not permitted to find its way into consolidated revenue of the Department of Treasury.

True Cost Recovery at Disposal Facilities

The Association is of the view that if true/full cost recovery were to be taken into account, disposal fees would be significantly higher than their current level. The Auditor Generals' Report into Municipal Solid Waste Management 1993 assessed disposal fees per tonne at \$30.02. The current disposal fees per tonne excluding GST are not significantly different 12 years later.

Realistic disposal fees drive change, innovation, investment, best practice and a more sustainable environment in the long term. As previously discussed Local Government political sensitivity could be addressed by the appointment of a Waste Authority, which could then monitor any suggestion of cross subsidisation of disposal fees by the ratepayer.

These fees also apply to liquid treatment plants not just landfills. An example of liquid waste, which has traditionally gone to a sewerage treatment plants, was to be diverted at

the same cost to a composting site. Composting is a marginal business and requires a gate fee on inputs to allow for recovery of operating costs. The waste generator had been prepared to pay the same price as the treatment plant, but once the owners of the latter were aware of the potential loss of revenue to the composting site, they reduced their disposal fee significantly.

One could argue this is the free market responding to competition, which is reasonable when private enterprise is responding to market forces. In this case example the questions we could ask are:

Was the facility cross subsidising the disposal of commercial liquid waste?

Was the price too high in the first place?

Why didn't the business accept the original offer of a long-term sustainable solution?

What incentives should Government provide to the business to drive change?

These are some of the questions, which need to be asked by Government very soon if some of the issues discussed above are going to be dealt with in the future.

Industry Waste Minimisation and Diversion for Reuse

The Association is generally of the view that the greatest opportunities for waste minimisation, diversion and reuse will come from industry. For example; daf waste from the dairy industry, pulp waste form paper mills, fish waste from the wild fish and salmon industry, vegetable waste from the food processing and agricultural industries to name but a few.

The waste management and resource recovery industry and the State Government can assist in addressing industry's waste management strategies. Incentives and/or disincentives to adopting change need to be implemented to drive change, this does not mean an increase in current disposal costs, and it can be a win-win for all stakeholders. Industries will be established and grow as a result of the implementation of waste minimisation and diversion policies. Sustainable reuse methodologies will ensure they remain viable in the long term and minimise the possibility of increasing disposal fees in the future.

Conclusion

The reports written over the past twelve years demonstrate that an enormous amount of work and resources have been committed to the investigation and assessment of existing practices and processes, developing strategy documents, coordinating forums and public meetings, managing the politics of the industry and making recommendations for change.

Looking back over the past twelve years since the Auditor Generals' Report on Municipal Solid Waste Management, progress has been slow but there has been change.

Examples include:

- The implementation of automated kerbside collection system in most municipalities around the state for refuse.
- Kerbside recycling is carried out in the majority of municipalities.
- Rationalisation of some rural landfills and

- A best practice landfill management plan, to name but a few.

The changes that will impact on the dynamics of the industry, which the Association considers remain unresolved are as follows:

- True/full cost accounting in relation to the operation and management of Local Government owned disposal and treatment facilities.
- The establishment of controlled waste treatment facilities.
- Waste generator / user pays philosophy i.e. CDL coupled with EPR.
- Community and industry education on the environmental and economic impact on best practice waste management and resource recovery practices.
- Introduction of State Government regulated waste levy managed via an Industry Authority, to provide the finance and platform to deliver innovation, drive capital investment and allow more sustainable methods of waste management and resource recovery to be implemented.

The recommended changes listed above reflect the majority but not unanimous view of the membership of the Waste Management Association of Australia Tasmanian Branch.

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