

20 July 2006

Australian Government Productivity Commission  
Waste Enquiry  
Locked Bag 2  
Collins Street East  
MELBOURNE VIC 8003

Dear Sir,

I refer to the Productivity Commission Report on Waste Management and would like to submit the following comments in relation to this report.

**Dot point 1.** in Key Points states that *Waste Management Policy should be guided by best practice approaches to policy development...., and that policy selected gives the best return to the community.*

In our region we have a diversification of population density ranging from 30,000 population in cities to sparse rural farmland of extremely low populations. It has been our experience that due to the small volumes involved and large cartage distances, the cost of providing recycling facilities at some waste facility sites ( and in some cases, kerbside) in smaller rural areas can often far exceed the cost of dumping to landfill.

Our member Councils are faced with the situation that the populous are continually educated via Government that "recycling is environmentally beneficial regardless of location". There is no reference or consideration of the actual cost to the community. Councils consequently find it extremely difficult and would be seen as being anti "Green" if a they did not provide recycling services for small communities.

**Dot Point 4.** in Key Points refers to how *some states have aspired to eliminate waste altogether.*

This is applicable in Victoria, and although rural areas do not have to comply to the same degree as their urban counterparts, the cost of supporting this requirement is prohibitive and is an additional burden on rural communities due to small volumes and large travel distances involved.

**Dot Point 8.** in Key Points – *the case for using landfill levies to address externalities is weak.*

We agree with this statement and point out the inequity between our rural communities as compared to large urban communities where by large urban communities have more scope to implement recycling and therefore reduce

waste but rurals do not due to small volumes but are subject to the same levies scales.

**Other comments:**

- Data – in rural areas historic accurate data is not available and utilising presented data needs to be undertaken with extreme caution.

Data comparisons between Councils and Regions is extremely difficult because of different policies within Councils and cultures of communities involved. If comparisons are needed then rather than comparing one Council to another (which is of little interest to the majority) a more beneficial comparison may be to compare previous yearly trends for individual Councils.

- The comments is relation to local Government being no longer the most appropriate authority to be managing waste have in the past also been supported and promoted by some of our member Councils. It would be of interest to have details as why this concept is not applicable to rural and regional areas as well as urban centres.
- An ethical conflict sometimes exists where a Council operates a landfill and obviously has financial targets to reach and the same Council also is responsible for promoting recycling.

Yours sincerely



**Neil Povey**  
**Executive Officer**  
**Waste REDUCTION Group**