

28 August, 2006

Attn: Delwyn Lanning
Waste Inquiry
Locked Bag 2
Collin Street East
Melbourne 8003

Dear Ms Lanning,

Re: Kogarah Council's comments to the Waste Inquiry

1. The discouraging of the phasing out of plastic bags

- The commission has suggested a cost benefit analysis be conducted. (*It is widely known that a cost -benefit analysis is an inappropriate tool for valuing environmental resources*).
- The commission states that the litter by weight of plastic bags is small (*Kogarah agrees with this it is however, it is a highly visible form of litter*).

In conclusion, Instead of a total ban, the government should mandate that all plastic bags manufactured are biodegradable or make it the responsibility of shops to set up an efficient recycling scheme for bags eg the current bins outside supermarkets are not emptied enough.

2. The removal of recycling targets

Governments should not directly or indirectly impose waste minimisation and recycling targets as part of waste management policy (*Draft recommendation 7.1.*).

There is advantages and disadvantages for this argument in the current target setting situation. The following are points made by the commission

- Targets can be useful as a motivational tool and to educate the public (*Kogarah finds this helpful to inform residents of our annual progress*).
- Data collection by government and waste generators is very inaccurate (*targets can only be set with reliable data, Kogarah has one of the most comprehensive data records of Sydney Councils*).
- Long term Targets are hard to set as Future costs are difficult to predict because of technological developments and various social factors that influence waste generation. The costs can also be affected by market conditions that are difficult to predict (*Kogarah agrees with this statement*).

- Moreover, broad targets set at a national or jurisdictional level do not take into account the different costs of dealing with waste in different regions eg rural compared to city (*Kogarah agrees with this statement*).

In conclusion Kogarah disagrees with the commission regarding the setting of Waste Reduction Targets, however the commission has made some valid points (outlined above) that the government should consider when setting future targets.

3. The unfair approach to Landfill levies

Governments should discontinue the current practice of using landfill levies (Draft recommendation 9.1)

- The new waste levies which came into affect in July 06 should be reviewed to ensure that they are not used for revenue raising, for general environmental projects but instead be used for the rehabilitation of old landfills and to ensure current landfills are working to minimize environmental damage and maximize resource recovery.
- The Landfill levy is supposed to ensure that residents pay for the full cost of garbage disposal.
- The Local Government Act prohibits Councils from charging residents more than the cost of providing a garbage service.

In conclusion Kogarah Council believes that any extra charges in the form of a levy should only be used to fund "waste initiatives".

4. The unequal waste charge regime recommended

- Kogarah currently has a charging system when a resident requests a larger bin, but not if they require a smaller bin.
- Kogarah is currently reviewing Councils who have a variable rate charge for bins of differing sizes to see if it increases the amount of illegally dumped material.

In conclusion Kogarah agrees with reviewing a variable charge for bin.

5. The discouraging of government, at all levels, involvement in the management and regulation of waste exchanges

Currently 3 state bodies administer waste exchanges, Kogarah disagrees with the commission as being administered by a government body ensures the waste exchange remains with its intended purpose.

6. The removal of the power given to local communities to regulate and manage their waste disposal through their local council, and the handing of that power to other bodies

This comment specifically refers to:

- a) Siting of waste management and recycling facilities
- b) Tendering process for collection contracts

a) A number of inquiry participants expressed concern over the siting of waste management and recycling facilities in urban areas. Although many participants and members of the community are supportive of recycling and waste minimisation, they seem reluctant to have facilities in close proximity to them (pg 310). Kogarah agrees that there is merit in the State Government siting waste management and recycling facilities based on the requirements of a region. With the advances in technology and examples from overseas, it can be proven that the impact to local communities would be minimal.

b) Local government authorities have an important role to play in enhancing the welfare and quality of life of local communities. Managing utilities should not be part of this role. (Packaging Council of Australia sub. 67, p. 23). (This statement shows how shortsighted the Packaging Council is, by collecting garbage and not allowing it to accumulate and pose a health risk to the community we are actually enhancing the welfare and quality of life of the local community)

The productivity commission refers to bodies at a state government level similar should manage the waste service. This has already been attempted with the old "Waste Board" set up. The Government disbanded these as they weren't meeting their targets. Currently Kogarah works collectively with other SSROC Councils on projects eg waste disposal tender which we have shown to make significant savings to councils, we feel that this is the most productive but also allowing us to have the advantage of dealing directly with residents.

7. The restrictions on waste avoidance schemes

- There is little being done in the ACT, or across Australia, to address waste avoidance and excessively high levels of consumerism and wasteful consumption patterns (PC pg91). *(Kogarah agrees with this statement, and feels that the push should be from State and Federal government and target manufacturers. As part of Kogarah's education project, we focus on the avoidance of waste, however marketing of a product will always entice the consumer).*
- There are no known examples of recycled content standards for the manufacture of products in Australia (pg 185). *(This statement is contradicted later in the document as it states that the newspaper industry uses 75% recycled content in newspapers).*
- The case for waste avoidance such as requiring suppliers to use less packaging is also questionable, as it could lead to problems such as increased losses, contamination and in-transit damage of goods (pg 283). *(This statement is also*

incorrect as in recent years glass bottles have become significantly light weighted with no detriment to losses of material instead there as been a reduction in the amount of glass requiring to be recycled, and a significant saving in transportation costs).

In conclusion, although the Productivity Commission has made some valid observations, as a document Kogarah Council cannot support the majority of changes proposed as they would be detrimental to our residents.

Yours faithfully

Stephen Clements
Director of Development and Health