

Global Olivine Western Australia Pty Ltd

A Submission on;

“Focus on the Future The Western Australian State Sustainability Strategy Consultation Draft”

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Summary of the GOWA Position on Sustainable Development

Global Olivine Western Australia Pty Ltd (GOWA) is seeking to develop a business in Western Australia that is founded around the concept of sustainable development. Consequently it welcomes the Government's decision to implement a sustainable strategy for Western Australia.

Many aspects of "Focus on the Future – The Western Australia State Sustainability Strategy – Consultation Draft" are encouraging. The acknowledgment that there is a need to balance the economic, environmental and social influences of a given proposition, suggest that the strategy will, in part at least, be based upon pragmatism.

Given that there appears to be so much common ground between the direction in which the Government is wanting to take its sustainability strategy and how we are seeking to operate; the vision of developing partnerships between government, industry and the community, our ability to have a positive impact on such environmental matters as Greenhouse Gas emissions, Renewable Energy production, the elimination of the widely unsustainable practice of landfilling and the development of a truly innovative industry that will be of global significance, it would be easy to assume that we would be happy with the way that the sustainability debate is developing in WA.

Such an assumption would however be wrong.

The business which GOWA is seeking to develop is a Renewable Energy and Resource Recycling Facility (RERRF). It is focused on the sustainable management of waste.

While much of the Consultation Draft appears to focus on the tenets of sustainable economic, environmental and social development, these seem forgotten by the time the report reaches the section on "Reducing and Managing Wastes".

At this point, references to the tenets of sustainability that flow through the balance of the document are replaced by references to dogma, ideology and pre-determined courses of action that do not appear to have been tested in terms of their economic, environmental and social sustainability.

If the recommended course of action in respect of reducing and managing waste as outlined in the Consultation Draft are adopted without revision, they will only succeed in sustaining the current system which delivers waste management services in WA. They will not deliver the most sustainable waste management service that currently available technologies can provide.

We strongly suggest that Government at all levels in Western Australia needs to consider whether or not it is serious about developing a waste management service that is truly sustainable. Current evidence suggests that they are not, but the opportunity to address this situation with a focus on sustainability, has not yet gone.

We urge Government to extend the principles of sustainability that it has incorporated in its strategy to the area of management of the waste resource. This is an area which has the ability to impact either positively or negatively on so many other aspects of the sustainability strategy.

We would suggest that the approach that the Government adopts on this issue will provide a useful benchmark against which society can judge whether the Government is truly committed to the tenets of sustainability or whether in fact it is prepared to compromise these tenets as political pressures dictate.

The Need to Transition to a More Sustainable Way of Life

The business of GOWA has developed from what we see as an urgent and increasing need to properly manage those byproducts of our day to lives that we currently view as waste. The way in which we presently treat waste has a serious impact on economic, environmental and social well being of our society. While this impact is less overt in Western Australia than other parts of the world, it is nonetheless real.

Waste treated properly can be a significant potential resource. Where presently its impact on the sustainability of society is all too often negative, by treating this material as a resource this impact can be changed to become positive.

That the Government has recognized the need to transition to a more sustainable way of life is welcome. They must though ensure that all aspects of their strategy reflect the tenets of sustainability and that dogma and ideology that is not focused on sustainability is eliminated

The Road to Sustainability

The draft sustainability strategy indirectly acknowledges that the road to sustainability is a long one. On page 75 the report acknowledges that the concept of sustainability gained wide acceptance in the 1980's. Twenty years later the WA Government has produced its first consultation draft.

This is not to knock the fact that the draft has been produced. Rather, it points to the fact that the interplay of economic, environmental and social issues that influence how we view sustainability almost inevitably mean that the move toward sustainability will take place over a considerable period of time.

We Must Make Progress Down the Road Toward Sustainability

The Consultation Draft acknowledges the need to proceed with caution. It suggests that we should *"avoid poorly understood risks of serious or irreversible damage, designing for surprise and managing for adaptation"*.

What it stops short of saying is that Government will support those proposals that demonstrate that they will lead to a more sustainable lifestyle than and which can demonstrate that the risks associated with their proposal are both well understood and, using established and defined bases of measurement, acceptable.

This omission calls into question the extent of the Government's commitment to sustainability. It suggests that the Government's commitment may be subject to political interference. If this is the case, then the Precautionary Principle is at serious risk of being abused. Invocation of the Precautionary Principle is already being used by interest groups to slow down or stop progress along the road toward a more sustainable Western Australia.

Unless, the Government makes a clear commitment to support proposals that clearly demonstrate that they embody the Foundation Principles contained in this draft document, then it is likely that the aspirations that are contained in this document will remain just that.

The Government must decide whether it is seeking to establish a Western Australia that is as sustainable as it can possibly be, or a Western Australia that is more sustainable than it was, but well short of where it could be. If "just" is good enough, then the Government should declare its position now.

We Cannot Forget Economic Sustainability

Despite the fact that the sustainability strategy is seeking to broaden the way in which we value things, the fact remains that for the time being, the prime determinant as far as decision making is economic cost.

While the move to sustainable development should see this change overtime, if the strategy that is designed to develop a set of values which takes greater cognisance of the need to include environmental and social factors within it, demands change at a pace which is greater than society will accept, then it is highly likely that this strategy will be rejected.

Omissions from the Sustainability Strategy

The scope of the Consultation Draft is impressive. We would suggest though that it is not exhaustive. One area which we believe merits exploration is the need to make an assessment of the sustainability of new proposals. At least one of the submissions to the Sustainability Policy Unit, that of the Eastern Metropolitan Regional Council (EMRC), identified that this was not presently a statutory requirement.

If Government has the level of commitment that it suggests, then we believe that assessment of the sustainability of a given proposal would be a valuable tool that could be explored to ensure that development in Western Australia was sustainable.

Such an assessment would though need to be conducted under a pre-agreed formula so that, as far as possible, the assessment is based on objective and quantifiable criteria. This would mitigate to a large extent the risk that decision making is influenced by interests that are not focused on sustainable development. The outline section on Sustainability Assessment included in the Consultation Draft appears to offer a sound platform from which this work can begin.

We believe that if development in Western Australia is assessed for its sustainability, then Government will be able to ensure that development which does take place will bring sustainable benefit in the broad context of the strategy to Western Australia.

For example, we understand that interest is currently being shown in the development of the timber/pulp industry in Western Australia. There are pulp facilities in operation around the world today that draw their power from the waste elements of the trees that are harvested for the raw pulp material.

No doubt establishment of a pulp facility in say the South West of Western Australia would bring economic and social benefit. A requirement that the plant be designed to run off as much biomass energy as possible, would also bring significant additional environmental benefits, thus enhancing the overall sustainability of the proposal.

We see mandatory assessment of proposals in the light of all alternatives and the impact that they will have on the overall activity that the proposal is designed to address as being an important additional tool that should be included in the Sustainability Strategy.

The Proposed Approach to “Reducing and Managing Waste”

As a business whose focus is on the management of waste, it is not surprising that our focus should be on this section of the Consultation Draft.

The current section “Reducing and Managing Wastes” of the draft document is not completely without merit. The suggestion that we should close the waste stream loops is one which GOWA has been advocating in WA for the last four years. It has been the motivating force behind the development of our RERRF. This development has occurred over the last 14 years.

There are however serious shortcomings in the approach which has been advocated by this particular section of the consultation draft and this section of our submission seeks to examine these in some detail.

References to “this section” or the “the document” relate to “Reducing and Managing Waste”.

Maximisation or Optimisation?

The current section “Reducing and Managing Wastes” makes frequent references to the need to maximize certain activities. Its use suggests that in some instances at least little if any thought has been given as to whether or not maximizing a given activity will be sustainable.

For example, we are told that the government has committed to maximizing the recovery and recycling of resources from waste into the same form as which they are delivered. In some instances this may be environmentally sustainable. We would suggest however, that it is highly unlikely that it will ever be economically or socially sustainable.

We would suggest that optimization of the recovery and recycling of resources from waste, will deliver a result that is more closely aligned to the tenets of sustainability as it suggests that a balance will be sought by the often competing demands of the sustainability model.

A lack of clarity in drafting the sustainability strategy, will lead to the propagation of activities which are unsustainable.

Recycling and Sustainability

It does not appear that the authors of this section of the report have given any thought to the rationale that they will use to establish the basis on which they will recycle. As noted above, they are seeking to maximize the recycling of resources from waste.

The current document makes a blanket assumption that the recycling of all those materials that can be recycled is in and of itself sustainable. Yet it gives no indication that this assumption has been tested.

This is not to suggest that GOWA is anti-recycling. Far from it. What we are against however, is recycling that does not constitute the most sustainable basis on which a “waste” resource can be utilized.

For example, the recycling of paper is an activity encouraged by this document. It is a proposed action for Government to take up. Indeed, the consultation draft itself was manufactured from recycled paper. The rationale for the recycling of paper, is that we

use less energy recycling a tonne of paper than we do when we make a tonne of virgin paper. Yet in a truly sustainable society, we would not recycle paper. Why?

Well in a truly sustainable world, the trees would be grown in a properly managed forest grown for the purpose of paper manufacture. The trees would be processed in a pulp plant that derives its energy from the tree itself, making little or no use of fossil fuel energy and so not adding to the overall greenhouse gas burden. The paper is then shipped to the point of use. Once it has served its primary purpose, the energy is recovered from the paper and the cycle begins again. Importantly the CO₂ in the atmosphere associated with paper production remains largely in balance.

The scenario envisaged by the sustainability strategy will see people encouraged to recycle as much paper as possible. The recycled paper which does not have a market will be sent off to a waste disposal facility. This is most likely to be a landfill, though it may, should the current thinking prevail, be a composting facility.

The paper which is recycled, will displace virgin paper, removing the incentive to grow sustainable forestry for the purposes of paper production. It will be recycled using predominantly fossil fuel energy, contributing additional greenhouse gases to the atmosphere. As this process can occur anywhere from three to six times, so will the greenhouse gas burden multiply.

The UN Environment Programme report on Dioxin and Furan Inventories, May 1999 tells us that recycling of paper will also significantly increase the dioxin content of paper. As the level of paper recycling increases, so dioxin levels increase. The result is that when the paper is finally disposed of to landfill or into compost, the dioxin burden within either the landfill or upon the agricultural land upon which the compost is spread is also considerably increased.

The recycling activity will require considerable subsidy from government. In WA the subsidizing of recycling already runs into many millions of dollars. Given this is the recycling of paper economically sustainable?

Given the increase in greenhouse gas emissions and the levels of persistent pollutants such as dioxin that is associated with the recycling of paper, is this an environmentally sustainable activity?

Society is being actively encouraged to engage in an activity driven by dogma, ideology and habit rather than reality. Given this, is the recycling of paper a sustainable activity?

As stated, we are not against recycling where it can be demonstrated that it is a sustainable activity. We believe that the case for metals is well proven. The differential in energy inputs as between recycling of metals and production of virgin materials justifies this activity from an environmental perspective. The activity is also economically sustainable and the combination of these factors combined with the input from society makes it socially sustainable.

For other activities, it is fair to say that the jury is still out. Plastics is a case in point. Current market prices, make the recycling of such things as PET economically sustainable. However, if more fossil fuel is consumed in the recycling of the plastic than would be required to manufacture virgin materials, is this an environmentally sustainable activity?

The drive toward recycling must be based on assessments of what is in fact sustainable, not what habit and ideology suggests may be sustainable.

Government Manipulation of the Market

This section of the report makes reference to a number of ways in which the Government might choose to participate in the market in an effort to encourage sustainable development. Under some circumstances we would welcome this. For example;

Where the Government seeks to impose economic sanctions on industries that are not sustainable, for example application of an economically meaningful landfill levy. This practice is acknowledged by the document as being unsustainable. The majority of landfills in Western Australia are Government operated, so application of a levy that would encourage a move away from unsustainable waste disposal would be in line with Government policy and the impact on private industry would be limited.

By adopting an economically meaningful levy that forces waste away from landfills, the Government will create a platform on which more sustainable waste management facilities can develop. As long as those technologies that seek to replace the landfill as the preferred point of disposal are subject to an appropriate assessment of their sustainability that takes into account all of the benefits they bring with them, then the Government will be assured that waste management services in WA have taken a step down the road toward sustainability.

However, Government manipulation of the market should be kept to a minimum and it should certainly be restricted to those areas where a detailed assessment of the sustainability of a given activity has been carried out and it can be shown that there would be benefit to the community as a whole. For this reason, we do not believe that subsidizing the development of markets for materials where the benefits in terms of sustainability are highly questionable. Markets that fall into this category would include recycled paper markets and markets for compost made from Municipal Solid Waste.

By limiting the extent of their involvement to movement away from unsustainable waste management activities, the Government will have ensured that the market that develops to replace the landfills is focused on delivering the best possible service at the most competitive economic cost. This section of the Consultation Draft and other documents published by Government departments such as the DEP indicate that businesses in Western Australia should anticipate that extended producer responsibility will at some stage become a reality in WA. Should the Government artificially manage the development of the residual waste management market, then they run the risk of making industry and the rate-payers of WA responsible for paying for an unsustainable system.

Government manipulation of markets should be kept to a minimum and only employed where the benefits in terms of sustainability are clear.

Untested Assumptions

This section of the document makes a number of other assumptions that do not appear to have been tested in terms of their sustainability. By adopting these untested assumptions, the Government is setting artificial boundaries that will prejudice the basis upon which an approach to management of waste is considered.

At best this approach will deliver a system that has its sustainability potential compromised. More likely, is that the system will continue to employ practices that are considered to be environmentally unsustainable and added to these will be practices that may be an improvement in terms of environmental sustainability, but which will be significantly less economically sustainable.

An important point for Government to consider is that as the public begins to be educated in the field of sustainability they will be better able to judge for themselves what is and what is not sustainable. Where Government's have allowed systems to develop that are clearly unsustainable, they must expect that society will express its opinion at the ballot box.

The following are examples of these assumptions;

“Waste Management decisions to achieve zero waste will be based on a rigorous application of the waste management hierarchy”

This statement suggests that Government is satisfied that the waste management hierarchy will deliver sustainable waste management. Where is the proof for this? We would agree that the waste management hierarchy is a useful guide. But to suggest that in and of itself the waste management hierarchy will deliver sustainable development in the waste management sector is at best simplistic.

In addition, its application is largely subjective. Using it as the basis for assessment allows a system such as ours that is focused on recovering and recycling of materials and value from waste to be ranked well down the hierarchy because one of the things of value that it recovers is energy.

The waste management hierarchy makes little provision for the wide-ranging elements that are outlined in the sustainability assessment section of the Consultation Draft. Accordingly, it should only ever be a part of the sustainability assessment process.

Reliance on the waste management hierarchy as the basis on which sustainability is determined may result in a system that has an improved level of sustainability. What can be certain however, is that it will sustain the interests and ideologies of those people who manipulate it.

The basis of sustainability assessment must be extended well beyond the simplistic and subjective approach created by adoption of the waste management hierarchy.

The Consultation Draft contains a version of the waste management hierarchy that differs from that generally referenced to in literature around the world. Normally the waste management hierarchy is limited to the reduction, reuse, recycling, recovery and lastly disposal of waste. The hierarchy included in the draft singles out energy recovery for special attention and places it well down the hierarchy.

What rationale/sustainability assessment was used to justify this variation? Did this rationale take into account the fact that man's ever increasing demand for energy and satisfaction of that demand with fossil fuel based energy sources has the single greatest impact on our environment?

The reference of the Consultation Draft to climate change and the need for Western Australia to adopt a global approach suggests that the Government is aware of the results of our energy consumption habits. The need to develop alternative sources of energy is also acknowledged. Yet the strategy suggests that the recovery of renewable energy from the biomass in the waste which is presently consigned to landfills is a low priority. This despite the fact that in a properly designed facility, energy recovery from waste can be achieved in a manner that is truly sustainable.

If the Sustainability Strategy is to be viewed as a truly valid document, it must be consistent in the way it is developed.

“It is expected that their (The Waste Management Board) plan will be based on achieving at least 70% of this goal (zero Waste by 2020) by reduction, reuse and recycling, and 30% through secondary waste reprocessing”.

This assumption simply compounds the problems that we see flowing from the previous assumption.

Elimination of 70% of our waste by way of reduction, reuse and recycling, will require considerable participation from society and the expenditure of considerable sums of money. The failure of the 1993 State Recycling Blueprint, which aimed for 50% recycling by 2000, suggests that the Waste Management Board has, at best, a significant task ahead of itself. What work has been done to test whether or not adoption of this target is economically and socially sustainable?

This assumption also suggests that a technical solution that is capable of managing in excess of 30% of the waste that is currently being sent to landfills in the Perth region will not be considered? This despite the fact that the alternative is that all of the waste continues to be sent to the landfill, a scenario which the document itself states is “no longer acceptable”.

Adoption of an approach such as this may well sustain the landfills and the people who operate them. It cannot possibly be considered to be environmentally sustainable particularly when technologies already exist that will not only eliminate landfills but which are in addition economically sustainable, environmentally sustainable and, for the majority of people in both Western Australia and around the world, socially acceptable.

The focus of the sustainability strategy must be on action and achievement not on vacuous statements of intent. The aspirations of Waste 2020 are available now, if the Government is prepared to act.

“Waste to Energy will only be used in accordance with the waste management hierarchy, State Bioenergy Policy and where it can be justified on the basis of lifecycle analysis”

Why is it that one particular residual waste treatment technology should have been singled out for special treatment? That the authors of this section of the Consultation Draft should consider it appropriate to undertake rigorous assessment of a technology is encouraging.

Regrettably the mechanism of assessment is largely subjective and the question that is left unanswered is why other solutions to the problems of waste management are not being similarly scrutinized?

We have already commented on what we feel are the shortcomings of the waste management hierarchy. The use of lifecycle analysis is something which we support and we ourselves have made use of this technique in fine tuning our process. This leaves assessment of a proposal that seeks to recover energy from waste in the light of the State Bioenergy Policy.

We have received advice that the draft State Bioenergy Policy is prejudiced against technologies that recover energy from waste. This would seem to be somewhat surprising given that Waste to Energy qualifies for Renewable Energy Credits (RECs) under the Commonwealth Government's Mandatory Renewable Energy Target (MRET) scheme, that the Electricity Reform Task Force (ERTF) appointed to review the power industry in WA felt that a properly designed Waste to Energy plant offered a “third” fuel source for WA after Gas and Coal and that around the world, Waste to Energy plants are recognized as being valuable sources of biomass fueled power (approximately 70% of the residual waste stream being organic/biomass).

To date we are unaware of any work that has been done by the parties drafting this policy to make a quantified sustainability assessment that has led to adoption of what appears to be negative stance on technologies that recover energy from waste. If such an assessment has been made, we would welcome the opportunity to examine it. We would also hope that the basis of assessment was extended to include the impact that a Waste to Energy process might have on the sustainability of the way in which we manage waste. If such an assessment was not made, then it suggests that the policy as been drafted along subjective lines making its use as a benchmarking tool inappropriate.

Sustainability Assessment must be rigorous, objective and applied across the board.

Management of Change Toward Sustainable Waste Management

The report notes that a Waste Management Board has been formed. It sets out how the instructions that have been given to the Waste Management Board as to how it is to operate. We have commented at length as to the shortcomings of these instructions and suggested ways in which they can be improved so as to improve the sustainability of the service that results from the activity of the Waste Management Board.

Even were these suggestions to be fully incorporated, there remains a degree of subjectivity in the way in which policy is developed. For this reason the make up of the Board is important. Independence of the Board and its members is vital.

Government has demonstrated that it understands the importance of independence in the way in which it set up the Electricity Reform Task Force (ERTF). The ERTF was drawn from people who had experience of the industry in question but who were not directly involved the electricity business.

Contrast this with the current Waste Management Board. While some of its members would fall into the category of independents, many are not.

How can members of the Waste Management Board who are actively involved in the operation of waste management technologies or the provision of advice and services to the waste management industry be considered to be independent?

How can members of the Waste Management Board who have a pre-determined views as to what does and what does not represent sustainable development in the waste management sector be considered to be independent?

If the Government is serious about establishing a sustainable waste management system, then it will ensure that the Waste Management Board is made up of independent parties not parties who may be compromised by vested interests.

Proposed Actions

The Sustainability Strategy sets out a number of proposed actions. Some of these reflect the tenets of sustainability others do not. We believe that the following “proposed actions” do not properly consider the tenets of sustainability and as such need to be carefully considered;

“4.44 Require the Waste Management Board to prepare a detailed plan for each waste stream outlining how Western Australia will achieve the goal of zero waste”

The proposed action assumes that delivery of sustainable waste management is best achieved by continuing to view waste as a number of different streams. While this in

convenient in terms of characteristics it does not encourage an holistic approach to waste.

By adopting an holistic approach to waste, it can be seen that a sustainable method of treating one waste “stream” can be used to support the treatment of other waste “streams” in a manner that is considerably more sustainable than if the various types of waste were treated separately.

Using our process as an example, by establishing a facility focused on treating the residual Municipal Solid Waste in an economically and environmentally sustainable fashion, we are able to treat all of the residual elements of the other waste streams being considered; commercial and industrial waste, packaging waste, construction and demolition waste, green and organic waste, controlled waste and problematic/dangerous waste, in an economically and environmentally sustainable fashion.

Treatment of waste streams in isolation from each other will not result in a system that comes close to realizing its potential in terms of sustainability.

“4.45 Encourage the use of recycled products by all government agencies, and the recycling of paper, glass, plastics, metals and organic wastes, as part of government’s Sustainability Procurement Policy and Sustainability Code of Practice.”

We have already raised some detailed questions regarding the sustainability of certain recycling practices. We believe that policies such as that contained in this proposed action need to be examined in terms of their actual sustainability rather than their perceived sustainability before they are rolled out. In this way Government will know that it is setting an appropriate example.

Assumptions regarding the sustainability of recycling must be tested.

“4.50 Conduct a comprehensive review of hazardous waste reduction and management in WA to assess behavioural change programs, producer and consumer responsibilities, quantities and sources of hazardous waste, current procedures for transport, storage and disposal of hazardous waste to ensure international best practice. Emphasis should be placed on rail transport of hazardous wastes. Importing of hazardous waste from interstate or overseas will be prohibited”

In its submission to the Sustainability Policy Unit, the Western Australia Local Government Association (WALGA) WALGA’s notes that *“The State Government must take responsibility for the management of intractable, high, medium and low-level hazardous waste”*. This comment clearly demonstrates that Local Government is not prepared to accept the risks and responsibilities associated with hazardous waste, although one of its members does derive economic benefit from operating a hazardous waste landfill.

Earlier in this document we explained our view that separation of waste into streams and seeking to treat them independently of each other compromises the overall sustainability of the waste management service. This comment from WALGA demonstrates that the body which oversees the provision of a significant part of the waste management service in WA is not focused on the overall sustainability of the whole system.

Advice received from the Government indicates that while it acknowledges that it has responsibility for these types of waste, it is seeking to transfer this responsibility to the private sector. It will then be able to limit its role to administering the checks and controls that will ensure that the system that delivers the service performs.

What does not currently exist in WA is a facility that is capable of eliminating hazardous wastes. WA relies on provision of these services by out of State facilities. Yet, this action note states that WA will not import hazardous waste. While refusal to import hazardous waste may be sensible, to be happy to export hazardous waste at the same time smacks of double standards and an unsustainable act.

WA needs a proper hazardous waste treatment facility that is focused on eliminating hazardous wastes. Transfer of the responsibility for management of hazardous waste to the private sector can occur but it must not be undertaken in the manner which is most expedient. It must be undertaken in a way that will lead to the most sustainable system developing.

“4.51 Require the Resource Recovery Precinct team to nominate and establish 5 resource recovery precincts for the metropolitan region in conjunction with community organizations and the Waste Management Board”

This proposed action seems to suggest that a detailed sustainability study has been undertaken that has found that the most sustainable mechanism for delivering waste management services in the Perth metropolitan region is to continue with the system that already exists. For “Resource Recovery Precinct” read “Regional Council” of which there happen to be five in the Perth Metropolitan Region.

GOWA can and has clearly demonstrated that if the Government of Western Australia is serious about moving away from landfill as the preferred basis for disposal of waste, then its proposed Renewable Energy and Resource Recovery Facility (RERRF) is the most economically and environmentally sustainable option available.

The facility will have a significantly lower cost of use than can be sustained by other secondary waste treatment processes. Its environmental impact will be significantly less than other secondary waste treatment processes. It will have zero residual wastes going to landfill and unlike other secondary waste treatment facilities it will offer solutions to the problems associated with **all** streams of residual waste and hazardous wastes that require management.

Despite the wide ranging benefits that the RERRF can bring it has been repeatedly rejected by the Regional Councils for reasons which bear little scrutiny.

One has to ask whether or not a body that would reject such a proposition is truly focused on sustainable waste management.

Should proof of just how thin the veil of commitment really is, then one should look no further than the statements made in the West Australian on the 11th January 2003 by Mr. Kevin Poynton Chief Executive Officer of the Mandurah Regional Council.

In this article Mr. Poynton advised the public that by treating 100,000 tonnes of its waste in a new and as yet unspecified facility, the MRC could extend the life of Tamala Park tip by almost 30 years. It is currently scheduled to close in 2010/2011. This clearly demonstrates that what one could safely assume would be one of the proposed “resource recovery precinct” operators is planning to operate its landfill for over twenty years beyond the date set down by Government for achieving zero waste.

The system structure of the system that delivers waste management services is critical to the overall sustainability of the service. This proposed action will simply sustain a system that is clearly not focused on delivering sustainable management of residual waste streams. It must be reviewed.

Private Industry and Provision of Waste Management Services

Throughout the Consultation draft there are numerous references to the need for the Government, communities and industry to work closely together. In an essential service area such as waste management this is particularly important.

In its submission to the Sustainability Policy Unit, one of the prime issues raised by the Western Australia Local Government Association (WALGA) was that they believed that *“A lack of strategic direction from State Government has resulted to an uncoordinated approach to waste management and an unfair burden on Local Government”*. Taken at face value, this statement suggests that Local Government would welcome the chance to be relieved of at least some of this burden.

The current system operated by Local Government for delivery of residual waste management services relies heavily on the use of landfills. The Consultation Draft notes that they are unsustainable. Yet replacement of these systems will require the use of more technically focused processes. The WALGA submission goes on to give an example of how one regional council, the SMRC, is attempting to improve the sustainability of their service. Yet a reliance on technical processes brings with it a wide range of additional risks and liabilities.

While we do not doubt that for a waste management service to be sustainable it must incorporate a great deal of the know how and expertise contained in Local Government, we do not believe that exposing the rate-payers of Western Australia to the risks associated with operating technical waste management processes will result in a sustainable service.

Under legislation being developed by the State Government, a party distributing say compost that contaminated the land onto which it was placed would be exposed to considerable economic sanction. Should this party be a Government body, then there is a risk that we would see a repeat of the unsustainable problems that have recently been associated with the Brookdale facility and latterly with the Bellevue plant. If this did not occur and the public sector operator was found to be liable, then it would directly impact on the rate-payers of Western Australia.

A properly constructed contract between Government and the Private Sector that incorporated an appropriate sustainability covenant that ensured that the interests of society were served would be a major step in ensuring the long-term sustainability of the waste industry in Western Australia.

Why Government Should Work with GOWA

If the Government is serious about making sustainable management of our residual waste materials a reality, then it will find a way to work with GOWA. Our business is focused on delivering a refining sustainable waste management services.

The following is a summary of the sustainable economic, environmental and social benefits which establishment of the GOWA facility will bring to Western Australia;

- A revolutionary waste management industry which will make WA a showcase for a global business that does not require State funding in order to proceed;
- Phase out landfills eliminating associated pollutants such as soil and groundwater contamination by leachate, unpleasant odours and pest breeding habitats making the zero waste aspirations of WAsTe 2020 a reality by as early as 2005;
- Production of 15% of Perth's daily water requirements via desalination of sea water using low cost renewable energy.
- New jobs created during construction and operational phases and by new ancillary and maintenance industries once operational;
- Increased utilisation of existing industries i.e. transfer stations, state rail, trucking industry, etc.;
- Potential new export markets from ancillary industries such as boiler and bag house manufacture and new by-product industries such as refractory panel construction and glass and glass frit manufacturing;
- Potential investment in local and national University R&D projects to improve existing process and develop new industries;
- Deals with waste management problems today minimising State liabilities for future waste management costs;
- Potential to reclaim old landfill sites, restoring high value land and cleaning up contamination;
- Minimises rate increases to the tax-payers of WA for waste management costs.
- Divert waste management away from reliance on landfill and its future liabilities;
- Safe and responsible disposal of problematic hazardous materials including PCBs and hazardous chemicals with no future liability eliminating the problems of Brookdale and Bellevue;
- Remediation of existing contaminated sites through GOWA facility processes.
- Sustainable and environmentally sound waste management solution for residual household and industrial waste, sewerage sludge, waste oils and up to 20,000 tonnes of tyres per annum;
- Provision to existing a future industries of low cost waste management services that will allow industry to discharge obligations that may be associated with extended producer responsibility, allowing industry to remain operational in Western Australia and limiting the drift of industry overseas to less rigorous

legislative environments possible leading to degradation of the global environment.

- Reduction in greenhouse gas emissions by eliminating landfills and the associated gas emissions – methane, dioxins, Hydrogen Sulphide, Poly Aromatic Hydrocarbons etc and by mitigation of fossil fuel power generation.;
- Process and treat industrial wastes that are currently released into the environment- flare gases, effluent outfalls, etc.;
- Responsible use and management of sewage sludge, badly contaminated water and liquids;
- Up to 160MW of modulating power generation from steam using a predominantly biomass fuel source, displacing fossil fuel generation with reliable low cost green energy;
- Significant renewable energy credit production;
- The GOWA RERRF will provide a new market for recycled materials including glass and metals and coordination of the State's recycling effort with the transport systems available to the RERRF will help to maximise recycling opportunity in WA;
- The GOWA RERRF is modular in design and so can be sized at a level that is well below the volumes of waste that are currently being sent to landfill, helping ensure that it does not drive unsustainable waste production.

Conclusion

The Waste Management Board have chosen as their motto the following quote from Albert Einstein

“No problem can be solved from the same consciousness that created it. We have to learn to see the world anew”.

GOWA has done this and the result could be the cornerstone of a truly sustainable and integrated waste reduction and management programme in Western Australia.

Western Australia has already experienced a number of significant incidents that are related to waste. Bellevue was the most dramatic example of this and Brookdale the latest. What is waiting around the corner? Will it be problems associated with hazardous materials being stored around the State? Will it be contamination of the ground water resource on which Perth relies by leachate from landfills?

Whatever the scenario, Western Australia is poorly equipped to respond and nothing that we have seen to date, suggests that this situation will change in the near future.

To draw an extract from a quote contained within the Consultation Draft itself made by William Clay Ford Jr. Chairman Ford Motor that is;

“We have an opportunity to have a major positive impact on society. We cannot afford to miss this opportunity”

Nothing could be more true of the waste management sector in Western Australia and the proposal that GOWA is making. Sustainable waste management and the aspirations of zero waste are available now. The current approach will not deliver a sustainable waste management service.

How the Government reacts to our proposal will send a strong signal to the market as to how serious it is in its stated intention of making sustainable development in Western Australia a reality. We urge Government to enter into the dialogue which they hold out as the way in which Government and Industry should interact going forward.

Actions speak louder than words!