SUBMISSION

to

The Department of the Premier and Cabinet

on

Consultation Draft

"*The Western Australian Sustainability Strategy*"

by

The Waste Management Association of Australia
(WA Branch)

24 February 2003

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Sustainability Policy Unit
Department of Premier and Cabinet
197 St George's Terrace
PERTH WA 6000

SUBMISSION ON
CONSULTATION DRAFT
"The Western Australian Sustainability Strategy"

We are pleased to present our submission on the consultation draft of the *"Western Australian Sustainability Strategy* "

The Waste Management Association of Australia (WMAA) is recognised as Australia's leading Association for waste management professionals. Membership of the Association covers industry, government, academics & individuals with an interest in waste management. WMAA has Branches in every State and has over 1000 members, with approximately 100 members in Western Australia.

This submission has been compiled through consultation with WMAA members in Western Australia and with the national WMAA office on strategic issues.

Our submission focuses on the "*Reducing and managing wastes*". However, comments are also provided on the sections on "*Sustainable agriculture*", "*Managing freight and regional transport*" and "*Sustainable energy*" because they also involve waste management issues.

Owing to the number and significance of our comments in this submission, we are keen to meet with the Sustainability Policy Unit to discuss the issues that we have raised.

If you have any queries on this submission or require further information please contact the co-ordinator of this submission, Mr Terry Waters (9472 8444, waters@iinet.net.au) or myself (9222 8601), lillias.bovell@environ.wa.gov.au)

Yours sincerely
Waste Management Association of Australia (WA Branch)

Lillias Bovell
President

Cc: Waste Management Board.
Minister for Environment and Heritage
Minister for Planning
Minister for Agriculture
Chamber of Commerce and Industry
Opposition Spokesperson for the Environment
Opposition Spokesperson for Planning
Western Australian Local Government Association
Western Australian Sustainable Energy Association
Compost Manufacturers Association
Australian Council of Recyclers
Beverage Industry Environment Council

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"The Western Australian State Sustainability Strategy"

1. BACKGROUND

1.1 WASTE MANAGEMENT ASSOCIATION OF AUSTRALIA

The Waste Management Association of Australia (WMAA) is recognised as Australia's leading Association for waste management professionals. Membership of the Association covers industry, government, academics & individuals with an interest in waste management.

WMAA represents people from many disciplines, including industry, physical & social sciences, engineering, law, government, management, occupational health & safety as well as people on the ground implementing recycling & waste management systems.

WMAA has Branches in every State and has over 1000 members, it is ideally placed to provide a national forum to foster the necessary structural & cultural changes within its membership. This will enable the waste management industry to respond to the demands for integrated resource management services.

Through our Members, WMAA will be a key agent for change as the managers of waste position themselves to meet new demands in a global market requiring both economically & environmentally sustainable solutions.

1.2 WMAA AND SUSTAINABILITY

1.2.1 General

The Strategic Directions for the Waste Management Association of Australia lie in the following three areas:

- technology and communication,
- people and skills, and
- profile (www.wmaa.asn.au/stradir.html).

Opportunities and roles for the WMAA under the first strategic direction include "Technology Awareness" - industry, government and the community need to remain abreast of emerging technologies as well as trends in current practices and technologies. These will arise in both our own markets and overseas. Within Australia the WMAA is well networked into the industry through our Members, and through the various forums that the Association convenes and manages there is a heightened awareness of changing technologies and continuous improvement activities.

This should be both widened in scope and extended in delivery. Widening our areas of technology awareness should encompass the move of the industry into areas such as cleaner production, greenhouse gas management, and sustainability. Embedded within these components and other technological advancements is the key feature of reducing resource utilisation without impacting on profit or production and the need to maximise our use of resources that have been developed. In parallel, the extension in scope should see the Association stimulating technology awareness within government and the community.

Some of the key actions and roles for the WMAA in relation to sustainability are:

- Investigate, develop and communicate an understanding of the emerging technologies in waste management and resource utilisation efficiency techniques.
- Investigate, develop and communicate an understanding of integrated resource management systems.
- Investigate, develop and communicate an understanding of extended product responsibility issues and roles for the industry in their implementation.

1.2.2 The Energy From Waste Sustainability Project

Energy from Waste (EfW) is often perceived to be no more than poorly disguised incineration and a technology that both destroys resources and creates pollution. However EfW can present a viable solution for recovering resources that would otherwise be lost to conventional landfill, while at the same time reducing the use of fossil fuels for our energy sources.

The EfW Division of the Waste Management Association of Australia has responded to the need to develop a framework for reaching consensus on this issue and is undertaking the development of two industry support documents.

- a Sustainability Guide for EfW Projects; and
- an Energy from Waste (EfW) Industry Code of Practice.

The key focus of the project is to engage in widespread stakeholder consultation in the development of these documents. This is necessary to ensure that widespread support and endorsement is achieved.

A Working Group is directing the Energy from Waste Sustainability Project. Working Group members have the responsibility for the preparation and redrafting of documentation on the basis of stakeholder input

This project has the support of Commonwealth Government funding through the Australian Greenhouse Office. Other funding has also been received from State Government bodies and industry.

1.3 PREPARATION OF THIS SUBMISSION

1.3.1 Consultation

This submission has been prepared in consultation with WMAA members in Western Australia and with the National Chief Executive Officer.

All members had the opportunity to submit comments on the strategy and review a draft of this submission. The WA Branch Committee ratified this submission on 26 November 2002.

Written comments on the discussion paper and/or on the draft of this submission were received from the following members:

- Bob Paulin, Agriculture WA.
- Chris Cornish, Brightstar Environmental.
- Fred Wren, Wren Oil.
- Kevin Poynton, Mindarie Regional Council.
- Ray York, Department of Environmental Protection
- Simon Sandover, Alcoa.

Terry Waters, TJ Waters Environmental, also provided comments and undertook co-ordination of preparation of the submission.

1.3.2 Copyright and Limitations

This document does not necessarily represent the views of the Waste Management Association of Australia. This document presents many points of view from members of the Western Australian Branch of the Waste Management Association of Australia.

2. PRINCIPAL ISSUES

Overview

The WAste 2020 vision is "***Towards** zero waste by 2020*", the vision is not "*…for zero waste by 2020*".

The Strategy provides the basis for all levels of government, industry and the community to work towards the goal of Zero waste. It is hoped that the Waste Management Board will further develop the WAste 2020 Strategy, including moving forward with the individual Key Actions.

Sustainability in governance

The use of "*sustainability assessment*" for new projects appears reasonable. Although we agree with the proposed action to establish an industry-government working group on sustainability assessment, the proposal to use three separate "Sustainability Assessment Units" in three separate Government Departments (DEP, DPI & DTF) would be an unworkable situation and would deter companies developing new projects and technologies in Western Australia.

It is suggested that one unit be established in one agency – suggest DEWCP or DPC (like NSW, VIC, QLD and recently SA). The unit would manage and act upon any actions from the Sustainability Strategy.

Sustainable waste management

The term, "*Sustainable Waste Management*" is in fact ultimately a contradiction because eventually it is intended that there will be no waste. However, until that state is achieved waste should be managed in a sustainable manner. The term "*Waste Management*" should probably be replaced by a term such as "*Resource Management*" or "*Resource Stewardship*".

Oil vulnerability

Re-refined oil should be classified as a renewable energy source and its use as a renewable energy source should be promoted.

Sustainable agriculture

There is a potential for significant contribution for composting processes to safely convert organic materials into a resource that will contribute to the productivity and sustainability of agriculture and in particular to the production of fresh food.

An action plan should be included that encourages research and development of sustainable options for the production and use of composts and bio-fertilisers.

Managing freight and regional transport

Effective implementation of sustainable waste management depends largely on the transport component; i.e., transport of raw materials to processing facilities and transport of products from such facilities to markets. As a principle, the closer processing facilities are to their resource the more efficient and sustainable the overall waste management system will be.

Accepting that agricultural and in particular the more intensive fresh food production can be a significant and beneficial user of composted organic materials, land use planning processes could assist the organic material management processes by retaining productive agricultural areas from urban spread.

Reducing and managing waste

We consider that this title is too negative. It should relate to waste as a resource. Suggested wording is:

- *Reducing waste and managing it as a resource.*

All the issues raised are important. The main topics of concern include:

- achievement of the Waste 2020 vision through 70% reduction, reuse and recycling, and 30% through secondary waste processing;
- life cycle cost analysis;
- strict adherence to a waste management hierarchy that, in some situations, would not appropriately address the principles of sustainability;
- waste-to-energy as an option of last resort;
- the proposed "Bioenergy Policy" and apparent lack of consultation;
- the WAste 2020 vision is "***Towards*** *zero waste by 2020*", NOT "*achieve zero waste by 2020*";
- placement of emphasis on rail transport of hazardous wastes;
- restriction of the import and export of hazardous wastes between Western Australia and the remainder of Australia;
- the proposed use of waste precincts; and
- encouragement of the collection and management of organics in forms that are best suited to use in agricultural and domestic situations.

Sustainable energy

Waste management has an important role to play in sustainable energy production. The current use of waste oils for energy generation and the use of components of the municipal and other waste streams for electricity production are examples of such production.

The "BioEnergy policy" should be developed in consultation with the community and industry. We understand that this policy is currently being developed within Government.

3. DETAILED COMMENTS

Wording from the Consultation Draft is shown in italics and proposed changes to this wording is underlined.

Section	***Comments***
Overview	
Page 5, third dot point.	• The WAste 2020 vision is "***Towards*** *zero waste by 2020*", the vision does NOT present a "…*target of zero waste by 2020*". This is a serious misrepresentation of the vision.
3.0 Sustainability in governance	
Sustainability assessment	• The use of "*sustainability assessment*" for new projects appears reasonable. However, the use of three separate "Sustainability Assessment Units" in three separate Government Departments (DEP, DPI & DTF) would be unworkable situation and would deter companies developing new projects and technologies in WA. Acknowledging that these agencies have a role to play in managing a 'sustainability assessment', a process needs to be developed that enables proponents to deal with all of the requirements concurrently – a "one-stop process". • We agree with the proposed action to to establish an industry-government working group on sustainability assessment.
Embracing sustainability in government agencies	• We generally agree with the waste management related aspects of this section. However, requirements relating to waste management under the proposed "*Sustainability Code of Practice and Action Plan*" should be for sustainable waste management, which includes sustainable recycling.
4.0 Contributing to global sustainability	
Oil vulnerability	• The re-use of oil should be a major consideration in this section but gets no mention.
	• Western Power is the largest WA user of re-refined oil, using about 6-7ML per annum of recycled oil for electricity generation at the Esperance, Broome & Derby Power Stations and according to recent decisions, the remote stations will soon change to gas or other fuels. Where will all the recycled oil go then? The strategy needs to address this issue.

	• Re-refined oil should be classified as a renewable energy source and its use as a renewable energy source should be promoted.
5.0 Sustainable use of natural resources	
Sustainable agriculture	• There needs to be a recognition of the role of the re-use of organic materials in agriculture and the considerable work already being undertaken in this area. • There is a potential for significant contribution for composting processes to safely convert organic materials into a resource that will contribute to the productivity and sustainability of agriculture and in particular to the production of fresh food. • An action plan should be included that encourages research and development of sustainable options for the production and use of composts and organic fertilisers.
6.0 Sustainability and settlements	
Managing urban and regional growth	
	• Sustainable waste management associated with urban centres needs to be considered in the planning processes. This includes facilitating composting as one of the principal mechanisms for processing domestic waste materials, particularly with respect to maintaining strategic agricultural areas as markets for these processed materials.
Managing freight and regional transport	
	• Effective implementation of sustainable waste management depends largely on the transport component; i.e., transport of raw materials to processing facilities and transport of products from such facilities to markets. The closer processing facilities are to the source (particularly with respect to municipal wastes) the more efficient and sustainable the overall waste management system will be.

Reducing and managing waste	
Title	• We consider that this title is too negative. It should relate to waste as a resource. Suggested wording is: – *Reducing waste and managing it as a resource*
Paragraph 1	• We agree with the first paragraph with the exceptions: – In the first paragraph delete the word "*management*" from "*Recent management experience…….*".
Paragraph 2	• We suggest that the second sentence be reworded to read: – *Sustainability requires a shift toward a closed loop economy, where the wastes from one part of society become the raw materials for another and where we minimise our use of natural resources without compromising profit or production and where we extract the maximum value from our natural resources.*
Paragraph 3	• We suggest that the third paragraph be reworded to read: – *Achieving this vision will require major advances in product stewardship ,advances in and use of technology such as Cleaner Production and community, business, Government and industry commitment for waste reduction. The development of markets for recycled materials is also an essential component of moving to zero waste. Government can take an active role in stimulating the development of markets for recycled materials through its own purchasing requirements as outlined in Sustainability and Governance: Embracing sustainability in government agencies.* • We agree with Government taking an active role, provided false unsustainable markets are not developed at the expense of other available sustainable options.
Paragraph 4	• We suggest that the fourth paragraph be reworded to read: – *It is no longer acceptable to the community to continue to dispose of waste to landfill, and the community is demanding preventative strategies to eliminate wastes and particularly those that can enable the elimination of hazardous wastes. Management of the treatment and storage of wastes and the location of waste facilities have been of great concern to many in the community. These concerns have arisen especially since the Bellevue chemical fire–one of the largest chemical incidents in Australian history, and recent community concerns about the management of hazardous wastes at the Brookdale Liquid Waste Treatment facility.* • The issue and concerns about the Bellevue fire were related to the management of the facility. The technology is well proven and commonly used. • The proposal to increase the materials allowed to be accepted at the Brookdale facility raised serious concerns in parts of the community about the facility and management of hazardous liquid wastes in general.

Paragraph 5	• The first of the five goals stated in the WAste 2020 vision has been omitted. It is: – *To achieve waste reduction, re-use and recycling outcomes which are environmentally, socially and economically sustainable.*
Paragraph 6	• In the sixth paragraph, it is stated that the WMB's goal will be to achieve the Waste 2020 goal through 70% reduction, reuse and recycling, and 30% through secondary waste processing. We are not aware of any such commitment by the WMB. We are also very concerned about an arbitrary selection of numbers without any sound justification. We propose that the wording (if consistent with the WMB's approach) should be: – *The government has established a Waste Management Board to implement the WAste 2020 Strategy. It is expected that their plan will be based on achieving this goal through a combination of sustainable reduction, reuse and recycling, and secondary waste reprocessing.*
Paragraph 6	• It is not clear whether composting is meant to be part of the 70% or the 30%. • There is a bold assumption in the paragraph that, "*Life cycle cost analysis will be used to determine the most appropriate and cost-effective method of processing waste, incorporating the environmental and social costs of each method*." • Life cycle costs MAY be one factor in the determination of the use of a particular technology. Other factors include potential environmental impacts and their management, community opinions (for which costs cannot be allocated) technical and commercial availability of technologies. • If "Life Cycle Cost analysis" is implemented in detail, it will be a very costly exercise that will take a very long time. Life Cycle analysis as a whole is a useful tool if appropriately used. It is probably not the best method for determining the most cost effective waste processing method. • The economic, environmental and social aspects of waste management decisions all need to be addressed. These should be included in any life cycle analysis process. Technical feasibility will also be included and community opinion needs to be managed by processes that avoid DAD and BANANA etc. • The use of life cycle cost analysis is contradictory to the definition of sustainability; it only includes one component, i.e., economics. • Change the sentence on life cycle cost analysis to: "*The Triple Bottom Line (TBL) aspects of Sustainability i.e. Cost, Environment and Social will be used to evaluate the best methods of processing waste that have not found a home through recycling or reuse*." • Strict adherence to a waste management hierarchy (there is not one consistent hierarchy currently in use by Government in WA) that is not based on sustainability principles is not consistent with sustainable management of wastes. • We agree with a general hierarchy of reduce, sustainable reuse and recycle, secondary processing (including waste to energy) and disposal. All projects should be considered on a case-by-case basis in terms of sustainability, ie., on an overall "triple bottom line" basis) However, we disagree with the statement that: – *"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." • The assumption that waste-to-energy is an option of last resort is not consistent with the principles of sustainability and we disagree with the assumption. • Some technologies provide a combination of recycling and energy production. These should not be excluded on the basis of a simple preferred hierarchy, but (as stated above) should be assessed on the merits of their "*sustainability*". • Since the "*Bioenergy Policy*" has not been developed, is not expected until the end of the year and is being developed without any industry consultation, we strongly disagree with reference to the policy in the Strategy until industry has an opportunity to review the policy and it is finalised. • We strongly disagree with the opinion that waste to energy must be justified on a lifecycle analysis for the reasons presented above. • We understand that the WMB will set guidelines for the siting of waste management facilities but it will not be setting guidelines and codes of practice for selection of technologies and management of facilities. • The wording infers that the WMB guidelines and codes of practice would be put into practice under legislation. If this is the case, we strongly disagree with this approach. • The WAste 2020 vision is "***Towards** zero waste by 2020*", NOT "*achieve zero waste by 2020*". This is a serious changing of the 2020 vision that needs to be fixed. • As stated above, "*rigorous application of the waste management hierarchy*" is not only unrealistic but it is against the principles of sustainability.
Paragraph 7	• We agree with this paragraph, particularly the wording, "…*world best practice in sustainable minimisation and management of wastes and resource consumption*."
Paragraphs 8 & 9	• We agree with the content of these paragraphs.
Vision	
	• The vision does not reflect a long-term view. Waste is already considered in many areas as a resource. We consider that waste will, in the near future, be generally considered as a resource. The long-term vision should be related to sustainable resource management. Consequently, we propose that the wording be changed to: – *Waste is a resource that is managed in a sustainable manner.*
Objectives	
	• We generally agree with the objects. However, it is important to ensure that all waste management is sustainable. We therefore recommend the following wording:

	– *Achieve the commitment and participation of all stakeholders in sustainable waste reduction, re-use and recycling practices and processes.* – *Prevent the generation of waste.* – *Maximise sustainable recovery and recycling of resources from waste.* – *Establish effective frameworks and structures to coordinate and facilitate sustainable waste reduction, re-use and recycling, sustainable recovery of resources and the safe management of remaining wastes.*
Actions underway	
	• We agree with the items listed.
Proposed actions	
4.41	• Since waste management companies are also involved in the work towards a zero waste society, the action should read: – *Continue to work towards a zero waste society and recognise the success of those individuals, innovators, industries and councils who are showing how this can be achieved*. .
4.42	• We agree with this action.
4.43	• We agree with this action
4.44	• This action is a mammoth task. It would be far more realistic to require the WMB to set priorities for management of waste streams and set a programme for development of plans. • In any case, there is no goal, "*of zero waste*", the WAste 2020 vision is "*Towards zero waste*"
4.45	We agree with the intent of this action provided that application of the Sustainability Code of Practice results in realistic and sustainable resource use and recovery, not just promote the use of recycled materials regardless of whether or not such use is sustainable.
4.46	• This action needs to state the objective for development of waste management plans. We suggest that the wording should be: – *Require all regional organisations of councils and other Local government Authorities, to prepare waste management plans that identify waste management issues, identify appropriate sustainable waste management actions and set programs for implementation of the actions.*
4.47	• We generally agree with this approach. However, we consider that the thrust of the fund should be optimisation of the use of particular resources, i.e., the WMRF to achieve sustainable resource recovery. • Delete the repeated words, "*environmental and social costs*."

4.48	• We agree with this action.
4.49	• This action seems to be too general to be meaningful. It requires further consideration and rewriting. • Any setting of targets should not be compulsory. They must be set in consultation with industry and with due consideration of the benefits that the community gets from processes that produce hazardous wastes. . Targets to address existing problems should be set in consultation with etc and managed within licensing processes. • We support the approach of Cleaner Production programmes so long as they are realistic and achievable.
4.50	• We are in agreement with this action, with the exception of: – *Emphasis should be placed on rail transport of all hazardous wastes. Importing of hazardous wastes from interstate or overseas will be prohibited.* • There is no need to place emphasis on rail transport. This approach is based on the assumption that transport by rail is always safer; this is not necessarily the case. Also, materials far more hazardous than wastes are transported in a safe manner daily in large quantities throughout WA in accordance with the requirements of the Dangerous Goods regulations and the Australian Dangerous Goods Code. The suggestion to transport by rail infers that the Dangerous Goods Regulations and the ADGC are inadequate, this is not the case. • It is necessary to be able to export wastes to other States and also accept wastes from other States. Commonwealth law already prohibits importing hazardous wastes from other countries. • Owing to the limited volume of hazardous wastes produced in WA it is often not economical to have facilities set up in WA to process the wastes. Consequently, it is sometimes necessary to send wastes to facilities in the eastern States. Also, to ensure some facilities in WA are financially viable, it is necessary at times for some wastes to be imported into WA for processing. • If importing of hazardous wastes from interstate is prohibited in every state, then as a country we would have to replicate hazardous waste treatment facilities in every state. This would be extremely wasteful!!! •

4.51	• Who is the "Resource Recovery Precinct Team"? • Why is industry excluded from the process? • What is the basis of "5" precincts, this seems to be a number plucked out of the air without any reasonable technical basis. • In any case, we consider that the establishment of waste precincts is against the principles of sustainability, particularly with respect to transport. • Waste facilities should be able to be set up at any location provided it meets planning requirements and is approved under the environmental assessment process. • Any precinct needs to be large enough for several operations and support operations. Where in Perth is such land available (other than in Kwinana which is principally reserved for heavy industry and for most waste facilities is too far from the source of the waste)?
4.52	• *Encourage the collection and management of organic in forms that are best suited to the production of compost that can be used in agricultural and domestic situations.*
Indicators and targets	
	• The aims of the WAste 2020 strategy have been misused to promote a new vision. The WAste 2020 vision is not zero waste by 2020. The first dot point should read: – *Progress towards the vision of "Towards zero waste by 2020*". • The second dot point seems also to have been, "plucked out of the air" without any reasonable basis. It needs justification and explanation. However, we agree with an approach to reduce resource consumption, provided that targets are realistic and achievable. • Comments on the third dot point are included above in the comments above on Paragraph 6. • Comments on the fourth dot point are included above in the comments on proposed action 4.51.
Global Opportunities in waste management	
	• We generally agree with the statement. However, innovative technologies need to be supported by appropriate Government actions.

Sustainable energy	• Waste management has an important role to play in sustainable energy production. The current use of waste oils for energy generation and the use of components of the municipal and other waste streams for electricity production are examples of such production.
4.66	• This action should be changed to include consultation in development of the policy: – *Develop a State BioEnergy Policy in consultation with industry and the community.*
	• We consider that one of the action plans should address encouragement of new renewable energy technologies. We propose that the following actions should be added: – *Encourage new technologies for the generation of renewable energy.* – *Classify re-refined oil as a renewable energy source and promote refined oil as a renewable energy source consistent with the MRET and the Renewable Energy Regulations.*

* * *

Respectfully Submitted

Waste Management Association of Australia

Mr Terry Waters

Member, Co-ordinator of Submission