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Waste Reform Project
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Reforming Waste Management – Waste Management Association of Australia Response to the Consultation Draft Environment Protection (Waste Reform) Amendment Bill 2016

The Waste Management Association of Australia (WMAA) is the peak body for all stakeholders in the waste and resource recovery industry in Australia. Our purpose is to assist our members to facilitate sustainable waste and resource management. We do this through leadership, collaboration and knowledge sharing.

We have over 2,000 members nationally based in a broad range of business organisations, the three tiers of government, universities and community groups. Our members are involved with a range of important waste management and resource recovery activities within the economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery and responsible management of residual materials.

EXECUTIVE SUMMARY

The waste, recycling and remanufacturing industry in South Australia (SA) is a significant contributor to the State's economy and environment. The industry contributes through:

- A turnover of over \$1 Billion in South Australia
- A Gross State Product of \$500 million
- Employing 4,800 Full Time equivalent persons in SA
- Reducing greenhouse gas emission by 1.23 million tonnes of CO₂-e in SA by recycling

Members of the WMAA SA Branch have been actively engaged with discussions and providing feedback to the SA Environment Protection Authority (EPA) on the subject of Waste Reform for over 24 months in structured reference group meetings and at committee meetings. WMAA also provided feedback in the form of a submission to the Discussion Paper: *Reforming Waste Management – Creating Certainty for an Industry to Grow* released in August 2015.

WMAA is generally supportive of waste reform and agrees with the principle that there is a need for changes to the regulatory settings to enable the South Australian waste and resources industry to maintain and build on its excellent standing in Australia.

WMAA acknowledges that the proposed *Environment Protection (Waste Reform) Amendment Bill* 2016 does not complete the reform program, but rather provides the EPA with the necessary framework to implement the waste reform changes in regulation and other areas.

WMAA is the peak body for the waste and resource recovery industry

Please note however that of significant concern to our members is the time it is taking to implement the waste reforms indicated in the Consultation Draft *Environment Protection (Waste Reform) Amendment Bill 2016*. With the recent levy increase to \$76 per tonne and increasing to \$103 per tonne by 2019/20, there is increased incentive for levy avoidance without appropriate controls in place, which will, in part be provided by the Waste Reform. The industry has been talking about waste reform for over two years and we would appear still some time away from seeing the reforms implemented.

WMAA in principle supports waste levies, however it is very keen for there to be a national approach to these, in order to create a level playing field for all operators in the industry. In supporting levies, WMAA is also very keen that monies raised by Government from these is re-invested in the waste industry to encourage greater investment in infrastructure, as well as increased diversion and resource recovery.

To this end, WMAA sees the waste reform will create additional cost (infrastructure and administration) to industry and local government, and therefore the community. To help mitigate these costs we request that the levies raised as part of the Waste to Resource Fund be invested to assist the implementation of the waste reform (e.g. weighbridges, data capture systems, training, monitoring devices, cameras etc).

Once the draft Waste Regulations related to the aspects of waste reform are released, WMAA will seek further feedback from our members, and would appreciate the opportunity to meet and discuss further with the EPA.

Based on our WMAA member and WMAA committee feedback, the following waste reform areas will be important to the industry to make sure they are reasonable and workable:

- Mass balance reporting
 - Extent and application of threshold levels
 - Reporting should include reporting on materials in, out and stockpile reporting
 - Frequency of mass balance reporting
- Financial assurance
 - Extent and application of threshold levels
- Stockpile control
 - Extent and application of threshold levels
 - This is one of the key items in ensuring a 'level playing field' in the industry
- Innovative change ideas
 - Alternative household kerbside collection frequency should be allowable under the Act in order to drive the maximum amount of recoverable resources from the kerbside collection systems whilst providing a high performing service to the community
 - Food waste recycling is a high priority area across both the MSW and C&I sectors. The promotion of commercial food waste collections from food waste producing businesses should be considered for Adelaide (and expanded to all of metropolitan Adelaide within a timeframe) particularly in light of the Carbon Neutral Adelaide initiative by the State Government and Adelaide City Council
 - Commitment to the management of problematic wastes and extended producer responsibility

WMAA also observes that appropriate levels of resourcing within the SA EPA and Green Industries SA needs to be in place to manage the proposed reforms and timeframes for implementation and ongoing compliance.

WMAA would welcome the consideration and adoption of these above points in the proposed waste reforms. WMAA is committed to its continued involvement in discussions with the SA EPA around waste reform in this state.

In summary, WMAA supports waste reform in South Australia and thank you for your consideration of WMAA's feedback. If there are any queries, please contact the undersigned.

Yours Sincerely



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