



SHOROC

RESPONSE

TO

***DRAFT WASTE AVOIDANCE
AND
RESOURCE RECOVERY
STRATEGY***

October 2002

INTRODUCTION

The Shore Regional Organisation of Councils (SHOROC), comprising Warringah, Manly, Mosman Municipal and Pittwater Councils, embraces the spirit and intention of the *Waste Avoidance and Resource Recovery Act 2001* and supports the creation of Resource NSW as the government agency to drive development under this Act.

SHOROC is widely recognised already as a body representative of local councils that have taken a leading and proactive role in waste minimisation through community education, effective recycling and reuse of recycled product.

SHOROC has adopted a policy, wherever possible, of dealing with its waste within its own region with the transporting of waste across other regions to remote land fills and other facilities only being considered as a last resort.

In order to pursue this ideology SHOROC acknowledges there are a number of matters that require urgent attention, not the least of which is the rapidly approaching closure in 2005 of Bare Creek, which currently handles the putrescible waste of the four councils.

At Kimbriki, SHOROC has clearly demonstrated what can be done to minimise landfills whilst recycling commercial, industrial, construction and demolition waste. SHOROC, mindful of what may be expected to assist Resource NSW achieve its targets, is currently undertaking an optimum use study for this facility that among other measures includes the commissioning of an Alternative Waste Technology Facility. Expressions of Interest have closed in relation to technologies that will be considered and it is expected that the tendering process will be completed early next year.

SHOROC is mindful that the adoption of the right Alternative Waste Technology would enable Kimbriki not only to receive redirected putrescible waste from Bare Creek but also to create a high-grade compost and “green” energy.

SHOROC councils will also be reviewing their kerbside recycling programs in the light of new developments in waste avoidance and recycling.

In responding to the government’s request for feedback on the Draft Waste Avoidance and Resource Recovery Strategy, SHOROC has addressed each element of the strategy in relation to the impact it will have on current and future waste operations in the region comprising the four councils.

Preventing and Avoiding Waste

SHOROC perceives that local government will require substantial direction from Resource NSW and the State government as the strategy is developed. Waste Avoidance at the point of manufacturing, provisions for industry to assist with the disposal of hazardous products and other initiatives directed at private industry may be of concern to councils should any of these strategies lead to cost shifting to council.

SHOROC envisages that waste streams and the separation thereof will undergo change over time that will impact upon council’s collection contracts, recycling capabilities and fuel stock

available for Alternative Waste Technologies. The number and size of bins and collection frequency must be known with certainty in order to enter into contracts for collection.

SHOROC is also anticipating regulatory changes that could result in new levies and charges that will have to be absorbed by councils' waste collection services.

The comprehensive approach to the product life cycle introduces numerous target groups addressing a variety of issues at a number of levels. This in itself creates a need for Resources NSW to be very clear in setting strategies that identify who is responsible to do what, when and at what level with costs being allocated in an equitable manner to ensure that councils are not expected to absorb the brunt of these new initiatives.

SHOROC is of the opinion that compliance with the principles identified in the strategy and activities already being implemented in relation to waste avoidance constitute disability factors for which councils should be compensated through the Commonwealth Financial Assistance Grant or other State government subsidy or levy reduction.

Increased Use of Renewable and Recovered Materials

SHOROC member councils support this initiative but believe that a great deal of work needs to be done in relation to common guidelines and regulatory provisions as to when and how certain recovered materials may be used.

Reducing Toxicity in Products and Materials

SHOROC assumes that once the toxicity level is reduced or removed entirely from a product and/or material then that product/material then becomes eligible for disposal in the same manner as non-toxic waste streams. Once again this leads to the requirement to know how much this will increase the volumes of waste streams for collection purposes and how the public will gauge what they can or cannot place into mainstream waste.

Reducing Litter and Illegal Dumping

SHOROC member councils are very proactive in this area and applaud any initiatives by Resources NSW to increase penalties and consequences for individuals and corporations found guilty of these activities. SHOROC would also like to see the proceeds recovered under any action against a perpetrator spent within the local government area in which the offence occurred to defray the cost of educating, policing, remediation and/or disposal of the waste.

Alternative Waste Technology

SHOROC is concerned that the use of alternative waste technology, especially the concept of energy from waste, is sending a mixed message to the general public that contradicts some of the earlier principles regarding complacency about creating waste in the first place. It will be important for the general public not to believe that waste streams are being put through magical

processes that preclude the need to source sort. It is important that waste stream contamination be avoided to protect the integrity of recyclables and green waste for instance.

SHOROC predicts that if the general public are sent the wrong message about waste as a fuel resource for “green” energy it will go against everything councils have been trying to achieve in the past with waste avoidance and reduction.

Summary

SHOROC supports the direction of Resource NSW in adopting strategies aimed at achieving the targeted levels of waste avoidance and reduction. However, SHOROC is also mindful that this initiative comes at a time when one of the great contributors to the strategy, Alternative Waste Technologies and Energy from Waste, are still in the research and development stage with some of the target levels based on doubtful comparisons to other countries and/or projected expectations from small scale research using optimum waste fuel. Early adopters of this technology should be provided with some safety net provisions or at the very least substantial levy reductions.

Member Councils have in general shown concern that the strategy does not set milestones for the targets given the target date is 2014.

SHOROC’s response covers matter common across the region and each of the member councils has responded to the draft strategy to include matters that are more localised.

For the purpose of your records a summary of SHOROC’s response under the seven suggested headings is:

1. Yes – we appreciate that action plans will contain greater detail
2. Yes – but enforcing acceptance of those roles should have been included
3. Yes
4. It would appear to be but there is an expectation, as indicated in our response, that some areas will seek to shift responsibility to local government.
5. Nothing that stands out immediately and we would think many of the actions will vary with application and interpretation
6. With milestones and sub-targets being identified the targets will be useful
7. May well be that it is difficult to have the same priorities across all regions and localities.

Duncan Gilchrist

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