

# Submission



**To** Waste Reform Project  
Environment Protection Authority  
ADELAIDE SA 5001  
Email: [epainfo@epa.sa.gov.au](mailto:epainfo@epa.sa.gov.au)

---

**From** Max Spedding, CEO - ALOA

---

**Date** January 4, 2017

---

**Subject** **Reforming Waste Management – ALOA's Response to the Consultation Draft Environment Protection (Waste Reform) Amendment Bill 2016**

---

The Australian Landfill Owners Association (ALOA) was formed in late 2008. It is an incorporated entity with members from across Australia.

Modern landfills are an essential element in today's integrated waste management infrastructure as landfills:

- Offer cost effective and reliable disposal of recycling and processing residues and unsorted wastes;
- Manage greenhouse gas emission by methane collection and combustion;
- Provide a source of renewable energy;
- Have the flexibility to accept variable waste volumes; and
- Are reliable last resorts for the acceptance of large volumes of 'disaster' waste.
- Member landfills provide services to the general public, local government, industry, property developers, mining and agriculture.

ALOA members receive and safely manage the disposal of almost three quarters of the waste landfilled in Australia.

Since its inception ALOA has defended the interests of its members in national and state issues. In particular, ALOA campaigned for fairer treatment under the 'carbon' tax and worked closely with the Australian Local government Associate (ALGA) to develop the Voluntary Waste Industry Protocol to utilise collected carbon tax monies.

ALOA is governed by a 'national' board and has state 'chapters' in each of the mainland states.

## RESPONSE

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

Members of the ALOA 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 the past 2 years in structured reference group meetings and at committee meetings in partnership with WMAA SA and other relevant Industry bodies.

ALOA is 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 standing in Australia.

ALOA acknowledges that the proposed Environment Protection (Waste Reform) Amendment Bill. 2016 provides the EPA and the Industry with the necessary framework to implement and manage the waste reform changes in regulation and other areas.

Please note however that there is significant concern amongst our members with the time it is taking to implement the waste reforms indicated in the Consultation Draft Environment Protection (Waste Reform) Amendment Bill 2016 and the lack of direct involvement with landfill owners considering the impact that landfills have in Levy collection.

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 evidence of appropriate new controls being put in place.

ALOA supports well-structured waste landfill levies. However, it is very keen for there to be a national approach to these to create a level playing field for all operators in the industry.

In supporting landfill levies, ALOA is also very keen that monies raised by Government be utilised to provide a uniform level of enforcement to ensure all regulations are acted upon and markets are created to create a demand for recyclables. Further, ALOA is keen to see South Australia introduce a levy 'credit' scheme to compensate landfill owners when they cannot collect levies due from defaulting customers.

The waste reform will create additional costs (infrastructure and administration) to industry and therefore to the community. To help mitigate these costs we request that portion of the levies raised as part of the Waste to Resource Fund be invested to assist the implementation of the waste reform (e.g. in service training, education and enforcement).

Based on ALOA member concerns and WMAA Landfill Working Group feedback, the following waste reform areas will be important to the industry to make sure they offer a level playing field for the industry:

- Mass balance reporting or waste/product characterisation volumes/end use data.
- 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 (this is one of the key items in ensuring a 'level playing field' in the industry).
- Alternative household kerbside collection frequency should be allowable under the Act to drive the maximum amount of recoverable resources from the kerbside collection systems whilst providing a high performing service to the community.
- Food waste/organics recycling being given a high priority across both the MSW and C&I sectors.
- Commitment to the management of problematic wastes and extended producer responsibility programs.

The industry has been talking about waste reform for over two years and we would appear to be still some time away from seeing the reforms implemented. ALOA 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 with a uniformed approach.

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

In conclusion, ALOA supports waste reform in South Australia and looks forward to participation in future discussions as the reform progresses. If there are any queries, please contact the undersigned or our local Chapter Chair - Mark Hindmarsh at [mark.hindmarsh@srwra.com.au](mailto:mark.hindmarsh@srwra.com.au) or on 0429934140.

Yours Sincerely

Max Spedding  
CEO