31st July 2009

Submission on the
Draft National Waste Policy Framework

The National Timber Product Stewardship Group (NTPSG) welcomes the opportunity to comment on the National Waste Policy Consultation Paper. The NTPSG comprises representatives from timber industry associations and companies from across the supply chain including forest growers, manufacturers, timber preservers, importers, wholesalers and retailers, with input from state government representatives. The group focuses on the recovery of post-consumer timber and wood products for reuse, recycling and as a source of renewable energy as well as maximizing the environmental benefits of end of life wood products.

While in general agreement with aims and vision incorporated in the Draft National Waste Policy Framework, we would like to make specific comments on issues within the draft which are either ambiguous, or will we believe, either limit the recovery of post consumer and post-production timber and wood or result in perverse environmental impacts.

1) Data and targets

a. Timber and wood products recovery is driven by demand. With the exception of small quantities of quality timber/wood removed from the deconstruction of structures which can have international markets, most end-of-life timber is of low or negative value. Demand is thus driven by local conditions. Any recovery targets set for timber/wood should recognise the current lack of local market opportunities in some areas, competition with existing wood primary processing residues and the potential large markets for recovery for use to generate renewable energy.

b. We strongly support the initiative to develop a standardised set of definitions and methodologies for waste classifications and data collection. There is considerable confusion over nomenclature, what constitutes reuse or recycling or recovery, recycling and definitions of waste under various state regulations.
Ongoing investment in recovery infrastructure is also dependent on having quality data.

c. With regard to the above, the industry has experience in Australia and overseas with targets for recovery. However in the Australian context, data on landfilled quantities and imports of particular products is collected irregularly because it is expensive and difficult to do so, or it is not collected at all. We would see an overall industry target of quantity recovered for reuse, recycling or renewable energy more appropriate, than a percentage target for recovery.

2) Market Arrangements

We have concerns over the commentary on an apparent lack of market signals to drive “creation or management of waste with respect to product design”. In the timber/wood industry there are clear market signals in the form of economic competitive pressures which daily influence product design in timber/wood products. While the needs of the customer dominate, a clear business driver is to reduce both material use and resource waste to ensure product pricing and disposal costs are minimised.

3) Maximising benefit

The strategic focus of the National Waste Policy must remain on the Aims of the policy. Commentary on possible downstream consequences – which are vague and outside areas of expertise - will lead to perverse outcomes. Improving the productivity of agricultural land for example should not be a priority of a National Waste Policy, and should not be incorporated into the document.

The introduction of the Carbon Pollution Reduction Scheme will be a key driver in increasing use of timber/wood. Alternative uses for post-consumer ands post-production timber/wood include mulching, animal bedding, particleboard and renewable energy. With the exception of recycling into new particleboard, which is not economic in many locations in Australia, decay or combustion of these alternative products results in biogenic CO2 emissions which are regarded as almost greenhouse neutral.
4) **Product Stewardship**

Product Stewardship is a useful tool in focusing our supply chain on waste issues. While the appropriate structure may vary for different sectors, establishing a set of key criteria which are sound and transparent is critical to ensuring consistent messages are given to industry. Our experience initiating and operating the National Timber Product Stewardship Group has been positive. This has enabled the industry to address a number of knowledge gaps and enter into a positive dialogue with the NSW Government and other jurisdictions.

5) **Costs of Disposal**

By our estimate over $360 million dollars will be raised by the NSW Government from levies on the disposal of timber/wood over the next 8 years. Some of this levy is from disposal of timber/wood from manufacturing operations. Many of these wood product manufacturers compete with business interstate or overseas which do not have the same levies on their waste. The National Waste Policy should provide for a level playing field for waste disposal levies with a view of keeping them to a rate that reflects the actual environmental impacts of waste disposal.

6) **Landfill**

Landfilling of organics (including timber/wood) is characterised as both a positive and negative issue. On one hand, landfilling of organics including timber/wood is addressed as a negative due to breakdown and subsequent methane emissions. At another stage, the production and capture of methane from landfill is seen as a positive contributor to renewable energy.

We would like to offer a couple of points:

1) Timber decay rates in landfill have been subject to considerable research. Work by researchers for the CRC for Greenhouse Accounting and the NSW Department of Primary Industries has shown that timber buried in landfill has lost from 0-18% of carbon mass after up to 48 years in landfill with a finding that decay of any significance was no longer occurring. Even if the maximum decay factor is used, diversion from landfill may actually result in greater greenhouse gas emissions than burial in well-managed landfill facilities.

2) Mixed waste streams in the C&I and C&D sectors, where most timber/wood presents itself, and the corresponding contamination of
recovered timber/wood remains a limiting factor for the industry. Transport logistics are such that new technologies are needed to improve decontamination avoidance and in sorting processes, however these are expensive and are not viable in many markets. Opportunities to reduce contamination should be considered which will lead to an increase in recovery where markets are established.

Again, we offer our strong support for a greater national co-ordination of Waste Policy in Australia to provide greater transparency and coordination of waste planning and strategy, and certainty for companies investing in this field. We believe that better utilisation of post-consumer and post-production wood and timber provides reuse and recycling opportunities for local companies, as well as opportunities for renewable energy generation and carbon storage to assist Australia achieve carbon pollution reduction targets.

We trust that these comments will assist the Australian Government in the development of a National Waste Policy.