The National Timber Product Stewardship Group (NTPSG) welcomes the opportunity to comment on the National Waste Policy Consultation Paper.

The NTPSG is the timber and wood products industry’s voluntary product stewardship scheme. The Group was set up in July 2007 with the objectives of:

- Doubling the recovery of post-consumer timber and wood products in Australia for reuse, recycling and energy to 1,000,000 tonnes per annum by 2017; and
- Optimising the positive environmental outcomes from the disposal of residual post-consumer timber and wood products; and
- Having the industry recognised as achieving these objectives.

Significant progress is being made in achieving this first objective with a recent review of published recovery data showing a 12% increase in post-consumer timber and wood recovery for reuse, recycling and the generation of renewable energy.

Membership of the NTPSG is from across the timber and wood product supply chain representing approximately 80% of timber and wood products consumed in Australia and includes:

- Australian Plantation Products and Paper Industry Council (A3P)
- National Association of Forest Industries (NAFI)
- Timber Preservers Association of Australia (TPAA)
- Engineered Wood Products Association of Australia (EWPAA)
- Osmose Australia & Arch Chemicals
- Forests NSW
- Timber Queensland (TQ) and Timber Development Association of NSW (TDA NSW)
- Timber importers and retailers

State government agencies NSW Department of Environment and Climate Change and the QLD Department of Tourism, Regional Development and Industry also have representatives attending meetings.

For your information, the NTPSG has developed and is currently implementing a *National Product Stewardship Strategy for Post-consumer Timber and Wood Products*. Called *Timber-More Life*, this strategy was developed by the industry, with the assistance of the Australian Government, to systematically address post-consumer timber issues and the timber industries response to it. A copy of the *Timber-More Life* Strategy is attached.

A number of original research projects were conducted to inform the development of the *Timber-More Life* Strategy. The reports on the outcomes of these projects and other more recent research are listed in the References page of this submission. Copies of these reports are available for download at our website at [www.timberstewardship.org.au](http://www.timberstewardship.org.au).

Please refer to the attached for our more detailed comments on the Consultation Paper. We also have some comments to make on the report *Waste and Recycling in Australia* by Hyder Consulting published in November 2008 which is referred to numerous times as a reference in the Consultation Paper.

In addition to answering many of the specific questions raised in the Consultation Paper we would like to make a few general statements. The NTPSG:

- Supports a product stewardship approach to waste management as this approach recognises that each party in the supply chain, including governments, has a role to play in minimising and managing environmental impacts of a product during product manufacture, use and at end-of-life;
- Supports the use of objective tools such as life cycle assessment which are applied over the whole-of-life cycle of products, not just end-of-life;
- Supports voluntary product stewardship initiatives;
- Encourages the Australian Government to consult closely with industry (other than the waste and recycling industry) and use a variety of relevant industry expertise in informing the development of a National Waste Policy;
Encourages the Australian Government to work towards improving the classification of waste data and the quality of waste data to achieve uniformity, standardisation and more reliable basis for policy, planning or similar purposes.

Encourages the Australian Government to give at least equal recognition to the energy recovery of biomass-based end-of-life material in any waste hierarchy;

Requests that nationally consistent objective criteria for product stewardship priorities to be declared “wastes of interest” be developed.

Submits that there should also be a focus on science based evidence when looking at the implications of timber and wood products in landfill.

The NTPSG also would also like to point out that in *Section 12 Waste and the economy* very little attention is given to the effects that increasing waste management costs and state government waste levies have on Australian wood products manufacturing. Many wood processing companies have significant waste disposal fees. Increasing waste and environment Levies, such as those in Sydney and surrounding areas are becoming a significant cost burden to these industries. With little or no markets or infrastructure to currently utilise recovered wood these companies are left with very high waste management costs. These costs are out of all proportion to the environmental impacts of the waste and are significantly higher than those manufacturers in other states and/or countries.

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

Please contact myself on 03 9289 1419 or Stephen Mitchell, Project Manager, National Timber Product Stewardship Group on 02 9279 2366 if you wish to discuss any matter raised by this submission.

Yours sincerely,

Peter Juniper

Chair - National Timber Product Stewardship Group
## National Waste Policy Consultation Paper – Comments

<table>
<thead>
<tr>
<th>Consultation Paper Question</th>
<th>NTPSG Comment</th>
</tr>
</thead>
</table>
| 1. Are there opportunities to further coordinate, harmonise or streamline approaches to waste management across jurisdictions? | The Consultation Paper does not mention industry with the exception of the waste and recycling industry. The waste and recycling industry is one small section of Australian industry. Better engagement with all industry is needed in the development of any draft national waste policy as:  
  - waste policy is increasingly impacting on costs of production;  
  - and  
  - there are opportunities for improvement at different stages in the product life cycle, including end-of-life. |
| 2. Are the categorisations, definitions and standards used to manage waste between and within the different levels of government effective and appropriate? | Clarification and standardisation of landfill types, and the types of waste they can accept, is needed so that consistent advice can be provided to customers on disposal and recycling options. |
| 3. Do the current waste management frameworks across jurisdictions:                          | Each state’s environmental regulatory framework is different. This is particularly frustrating for those working across state borders and hinders those industry organisations wishing to develop and deliver national strategies and policies. The frameworks for defining and classifying waste and recovered materials need to be uniform and consistent. |
  - deliver an effective regulatory framework?  
  - provide an appropriate suite of approaches to address waste and resource recovery issues?  
  - work effectively in conjunction with planning and other environmental legislation?  
  - provide the right incentives to manage materials, products and waste sustainably and holistically?  
  - need improving, and if so, how could this be done? |
<p>| 4. In the 1992 National Strategy for Ecologically Sustainable Development, COAG endorsed the strategies and objectives for a national approach to waste management (Appendix A). Looking ahead to the next decade, how could these strategies and objectives be | The strategic approach and objectives in the 1992 Strategy are largely just as relevant today. A number of the actions Governments said they will undertake have not been undertaken. |</p>
<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>updated to provide the basis for a national waste policy that responds to current and future challenges and opportunities?</td>
<td>Going forward, there is a need to incorporate recovery for energy as well as carbon storage (within products and facilities) in with reuse and recycling as options within any waste hierarchy.</td>
</tr>
<tr>
<td>5. What waste issues would most benefit from a national approach? What strategies could be considered and how could the need for local solutions be integrated with a national approach?</td>
<td>Greenhouse gas emissions (GHG) from waste and recovery management are an issue that would benefit from a national approach. The Carbon Pollution Reduction Scheme (CPRS) should be the primary vehicle for addressing this issue as it will eventually include all sectors of the economy.</td>
</tr>
<tr>
<td>6. Are there waste management initiatives in operation overseas that could apply in the Australian context? If so, which ones and why?</td>
<td>Yes – a larger place for energy recovery from biomass material from post-consumer and post-production sources. Energy produced from the combustion of renewable wood is considered by the Australian Department of Climate Change to emit over 50 times less greenhouse gas emissions than the combustion of black coal and over 30 times less than natural gas when used in industrial facilities. The use of end-of-life wood and timber to generate renewable energy on an industrial scale is widespread in European countries such as Denmark, United Kingdom and Germany.</td>
</tr>
<tr>
<td>7. Australia needs to safely manage hazardous waste and waste containing hazardous materials over the long term.</td>
<td>No comment</td>
</tr>
<tr>
<td>o Are there any changes to current arrangements that would improve Australia’s capability to safely manage hazardous waste, for example in regard to adequate infrastructure or disclosing the contents of goods and substances?</td>
<td></td>
</tr>
<tr>
<td>8. There are a number of approaches to product stewardship operating in Australia.</td>
<td>The timber and wood products industry has its own national Product Stewardship scheme. Attached is our Timber-More Life Strategy, the 2008 Progress Report and the latest data on post-consumer wood recovery. More information is available at <a href="http://www.timberstewardship.org.au">www.timberstewardship.org.au</a></td>
</tr>
<tr>
<td>o What, if any, role is there for a national approach and what would be the costs, benefits, opportunities and focus of such an approach?</td>
<td></td>
</tr>
</tbody>
</table>

---

### o What models might work in Australia?

Nationally, an agreed framework for consideration of “wastes of interest” is needed.

Some Australian developed product stewardship initiatives, voluntary and co-regulatory, are world’s best practice and this should be acknowledged in any national waste policy.

The timber product stewardship scheme, which is voluntary, is the only one we are aware of that applies to all end-of-life timber in the world. Significant progress is being made in achieving objectives.

### 9. Are there any aspects of waste management that could be improved or streamlined through adopting national standards?

National standards for landfill (and landfill alternatives) gas measurement are needed so that landfill and their alternatives waste management options can be compared objectively.

Improved standards and methodologies for comparing GHG emissions from individual waste types are also needed so that GHG emissions costs can be attributed to the appropriate products.

### 10. What fundamental data sets does Australia need to collect to better inform waste management policies, practices, investment, business operations and to assess and manage risk?

Need better data on different types of timber and wood wastes. There is some confusion in data between bark/wood from primary processing and garden organics collections (as recognised in the Waste and Recycling in Australia 2008 report by Hyder Consulting).

Improved data quality is needed with appropriate chemical testing to better manage risks involved in recovery options.

### 11. What, if any, place should there be for approaches that seek to avoid waste through changes in design, production processes and transport?

Criteria to avoid waste should not be the sole criteria on which products are assessed. Life cycle assessment over the whole-of-life cycle of products is a good tool that is and could be of further use in this area.

The Australian Government should work with the Australian Life Cycle Assessment Society to set up and maintain a Life Cycle
<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>12. What changes could be made to improve management of the municipal waste stream and those of the commercial and industrial sector and the construction and demolition sector?</td>
<td>As a driver for improved waste recovery development of markets for recovered wastes should be a priority.</td>
</tr>
<tr>
<td>13. Landfill is currently the primary means of waste disposal. What, if any, changes need to be made to manage Australia’s waste stream in the long term given current trends in the volume and nature of the waste?</td>
<td>Data on current trends is misleading. Increased data generation should not be confused with increased waste generation. Australian Government needs to be mindful that approaches to diversion of municipal waste do not translate into diversion of waste from C&amp;I and C&amp;D waste streams.</td>
</tr>
<tr>
<td>14. Reducing the amount of organic waste sent to landfill has the potential to contribute to reducing greenhouse gas emissions as well as other potential environmental and economic benefits. What are the benefits and opportunities, costs and disadvantage of increased diversion and/or recycling of organic wastes?</td>
<td>Reducing the amount of some organic wastes disposed to landfills generate greenhouse gas emissions. Some organic wastes may in fact be a medium for long-term storage of greenhouse gases. World-leading research by Ximenes et al (2008) is demonstrating that solid wood products deposited in landfills can be a carbon sink in the long-term. There should be a focus on science based evidence when looking at the implications of timber and wood products in landfill.</td>
</tr>
<tr>
<td>15. What, if any, changes are needed to the way e-waste is managed?</td>
<td>No comment</td>
</tr>
<tr>
<td>16. The Carbon Pollution Reduction Scheme will apply to emissions from landfill. Are there related approaches that would complement the scheme and thus contribute to meeting the emissions targets and the timeframes set in the Australian Government’s climate change policy?</td>
<td>NPTSG view is that the CPRS should be the sole mechanism which determines the price on carbon emissions from landfills. The Australian Government should seek to coordinate agreement across states on common methodologies for: ○ Auditing incoming waste characterisation and quantification; and ○ Estimating actual GHG emissions from all types of landfills.</td>
</tr>
<tr>
<td>17. What are the opportunities to reduce water and energy use through the way waste is managed?</td>
<td>Opportunities to reduce energy and water use are very often regionally specific and can vary over time.</td>
</tr>
</tbody>
</table>
NTPSG supports the use of life cycle assessment, across the whole of life-cycle of products, not just the end-of-life stage, as a means of identifying regional opportunities to reduce environmental impacts.

18. In what ways can waste management and resource recovery (including recycling, re-processing, re-manufacturing) industries add further value to the economy and create employment?

Reuse, recycling and energy recovery from biomass material can add value to the economy at the same time as reducing environmental impacts. These need to be examined in a more detailed way, preferably in a regional economy context and in the context of Australian manufacturing and construction industry.
Waste and Recycling in Australia - Comments

SECTION 3 ORGANIC WASTE

Recovery of organics, Australia 2006/07 Table 3-6

This table does not include recovery of wood/timber by companies other than organics reprocessors/composters. Recovery of wood/timber in 2006/07 is more in the order of 530,000 tonnes (NTPSG 2008)

SECTION 5 OTHER KEY PRODUCTS IN AUSTRALIA

Consumption and Disposal of Products Table 5-1

A quantity of 4,311,600 tonnes of structural timber is cited as being consumed in Australia in 2005. There is no reference or methodology given for this estimate. This figure is approximately twice the total consumption of all sawn timber in Australia in that year (ABARE 2008).

A quantity of 1,112,010 tonnes of structural is cited as being disposed of in Australia in 2005. There is no reference or methodology given for this estimate. The NTPSG is not aware of any waste landfill audits that categorise wood/timber disposed of into the structural timber category. Our research conducted at transfer stations and landfills around Australia indicates a very significant proportion of waste wood/timber generated is wood pallets and packaging.

A quantity of 671,670 tonnes of treated timber is cited as being consumed in Australia in 2005. There is no reference or methodology given for this estimate.

A quantity of 388,530 tonnes of treated timber is cited as being disposed of in Australia in 2005. There is no reference or methodology given for this estimate. This is a very significant overestimate of the quantity of preservative treated timber disposed of each year in Australia. In the only weight-based audit performed at C&D disposal facilities (DECC 2007) which also incorporated chemical testing of representative wood samples, only 4% of the timber found in the mixed CD stream (>30mm) was found to be treated with the wood preservative copper chrome arsenate (CCA). This equated to only 3,440 tonnes. The five landfills selected for the mixed C&D waste audit accounted for 88% of the mixed C&D waste disposed to landfill in the SMA and 77% of all C&D waste disposed to landfill in the SMA.

In a subsequent study by the Timber Development Association (TDA 2008) which targeted post-consumer wood packaging and testing with X-ray Fluorescence (XRF). Only 1% of post-consumer wood packaging in Perth, Brisbane and Sydney was found to be treated with the wood preservative CCA.

These two studies strongly suggest that the estimate of wood treated with the preservative CCA disposed of at landfills in Australia is significantly less than the figure cited in this report.

Product Stewardship Assessment Criteria Table 5-2

The assessment criteria, definitions and relative weighting bear no relation to the potential environmental impact of products.

Priority rating Table 5-4

Freight packaging – pallets is given a priority rating of VL. No information is provided on consumption or disposal in Table 5-2 or scores against criteria in Appendix 2.
SECTION 7  GREENHOUSE IMPACTS OF WASTE MANAGEMENT

The application of Department of Climate Change methods and default values for individual materials is an incorrect application of these values. These values were developed to estimate overall emissions from different sectors for country wide GHG emissions. The misuse of these default values to individual waste components in this context is resulting in a significant overestimation of GHG emissions from the waste sector. Peer reviewed Australian research (Ximenes et al 2008) is showing that solid wood/timber in landfill is a carbon sink rather than a source of greenhouse gas emissions over the long term.

As these values have implications for waste policy, a range of values should be examined before a National Waste Policy is finalised.
References


Attachments

Timber - More Life  A Product Stewardship Strategy for Post-consumer Timber and Wood Products

Timber More Life - Annual Progress Report 2008

Post-consumer Timber Recovery Data 2006-07