



Inner South Canberra Community Council

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ISCCC RESPONSE TO WASTE FEASIBILITY STUDY ROADMAP AND RECOMMENDATIONS: DISCUSSION PAPER

The Inner South Canberra Community Council (ISCCC) is pleased to provide brief comments on the proposed Waste Feasibility Study Roadmap and Recommendations.

The ISCCC is a voluntary, not for profit, community-based association operating in the inner south area of Canberra. The ISCCC's objective is to preserve and improve the social, cultural, economic and environmental well-being of Inner South Canberra and the Inner South Canberra community.

1. The ISCCC supports the ACT Government's goal of reducing, reusing and recycling waste and in driving towards zero net emissions by 2045. The ISCCC congratulates the Government on its Waste Management Act and Regulations and the redesign of the Hume Materials Recovery Facility contract and the diversion of mattresses from landfill, achieved as part of the process so far. ISCCC applauds the intention of government to divert and process more food and green organic waste as recommended in the Waste Feasibility Study.

2. The ISCCC supports, as a matter of urgency, the development of a clear and coherent ACT Waste to Energy policy, preferably modelled on the NSW policy. The *ACT Waste Management Strategy 2011-2025* included a strategy relating to investigation of waste to energy technologies, yet there is still no agreed policy. The NSW Government has developed a *NSW Energy from Waste Policy Statement*. ISCCC requests that prior to proceeding with further approvals for major waste facilities such as the CRS proposal for Fyshwick, that the ACT Government develop a Waste to Energy Policy as recommended at 1.10 of the Roadmap of the *Waste Feasibility Study*. Such a policy should clearly identify also the possible issues associated with converting waste to Processed Engineered Fuel (PEF). These issues should be resolved before any such proposals can be brought forward within the ACT.

3. The ISCCC supports recommendation 2.6 in the Roadmap calling for a review and update of the ACT Waste Management Strategy 2011-2025. Seven years after the commencement of the strategy, it is timely to review progress against the strategy and update it to reflect more recent developments and technological changes in waste management.

4. ACT Government industry support must not be to the significant detriment of existing residents and traders, and must include provisions to preclude anticompetitive outcomes arising from exclusive, long-term access to Canberra’s municipal waste.

The *Market Sounding to Industry* in 2017 and the deliberations of the *Waste Feasibility Study* both mentioned government support for industry in terms of relevant siting, regulatory planning, zoning and policy decisions and certainty with regard to access to the Territory’s municipal waste supply. However, it is critical that such support not have adverse unintended consequences for affected residents and traders, and also in terms of potential monopolies that may work against ongoing Government and community efforts to reduce the amount of material going into municipal waste.

5. The ISCCC supports continued efforts by the ACT Government to explore options to increase the amount of organic household waste that can be composted and marketed commercially, especially through separation at source. The ISCCC acknowledges that comprehensive source separation of waste is essential to an effective system producing a least contaminated product and that the introduction of a regulatory mechanism to enforce at-source sorting of waste could be incorporated into the Act. For example, there might be some need for the Government to modify (and be prepared to enforce) its rules if necessary to encourage developers to make it possible for the residents of multi-unit developments to segregate their waste appropriately.

6. The ISCCC requests that suitable locations for waste management be identified to comply with the Development tables of the Territory Plan 2008 and the Planning and Development Act 2007.

The Hume Waste Precinct is clearly one such location, as indicated in the *ACT Waste Management Strategy 2011-2025* and, more recently, in Attachment 2 of the *Market Sounding* (2017):

A2.1 The Hume Waste Precinct is immediately southeast of the ACT landfill and, aside from its proximity to the transfer station, recycling collection and green waste processing that occurs, is adjacent to a major arterial road that connects to the interstate highway. Rail and air links are nearby, as is the NSW boundary. The area is zoned industrial and it is an excellent site for a waste precinct and is one that will eventually grow into a nationally recognised waste centre of excellence (page 16).

7. The ACT Government should ensure that key capabilities and capacity/resources are maintained in ACT NoWaste to ensure effective regulation, monitoring and management of waste processing and material recovery. As the ISCCC has learned through the many complaints received from inner south residents on building design and quality issues, the Government’s outsourcing of many key functions, for example through the use of private certifiers, can end badly if there is not strong ongoing Government oversight. Strong capacity must be retained in ACT NoWaste as the Roadmap is implemented.



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