From:	Steve Marshall
To:	WARR Reform
Cc:	mike@focusdemolition.com.au
Subject:	Comments on the draft "Discussion paper - Waste levy and waste management: Proposed approaches for legislative reform"
Date:	Tuesday, 14 November 2017 10:03:18 AM

Dear Sirs,

I cannot claim to be an educated person or able to present my comments in “Envirospeak” , however we have no particular issue with the current approaches suggested in the document. We do not find it relevant to detail what is going on in other states, as the availability of resources and potential landfill sites is impacted by the 200 years development and consumption.

Were the Minister to propose changes that impact the industry, we suggest that long term sustainability of the policy itself be a key matter for consideration. As a case in point, when the introduction of the current levy regime was approached , like the US forces in Baghdad – we went in with a plan of attack but nothing in place once the initial target was achieved. The “dream” was achieved , but the resources were not sufficient to enforce compliance . The analogous “insurgents” are the country operators who now commercially appeal for business in the local Perth market at rates not possible were the levy included.

Local contractors find it commercially attractive to transport C&D waste to sites well outside the current levy catchment area. Are the policies actually working ? We suggest not.

We also observe that the market for re-processed material or “recycled’ has been impacted, not only by direct economic factors, but a lack of clarity as to when it is deemed to be no longer subject to the levy.. . We assume that when recycled product meets the criteria currently set down, having been processed by a licensed facility, it may be put to use, however elements of the “Beech Decision” appear to imply that the levy is still due. Given that this appears to contravene the intent of imposing a Landfill levy in the first place - it may not be so, however we have observed such confusion in our market.

We suggest that clarity be given by specifically wording the legislation to differentiate between processed and unprocessed materials.

It is our further observation that matters of levies and waste legislation have been canvassed in a limited field – and policy may have been unduly impacted. We suggest a greater liaison with industry players, and a clear separation of C&D versus general waste, in order to consider matters of volume and tonnage , and propensity for recycling appropriately.

Previous discussions have touched upon government support for recycled materials. The levy itself has not achieved what should be possible, given the relatively low price of virgin material. General rules of economics suggest that continued focus on one side of the equation is less effective, than a balanced approach. We draw your attention to the fact that consumption of natural resources continues with no such impost – and while many, if not all of the intangible costs to the community alluded to in relation to landfill sites are represented in quarried product, there is no balancing application of levies to match.
Levies received on raw materials are in the region of cents per tonne – if at all, compared to $90

per tonne for C&D waste.

We wish you all success in your endeavours.

Steve Marshall
Forrestdale Recycling