



WASTE CONTRACTORS &  
RECYCLERS ASSOCIATION  
OF N.S.W

ABN 72 805 135 472

Suite 2, First Floor  
12-16 Daniel Street  
Wetherill Park NSW 2164

PO Box 6643  
Wetherill Park BC NSW 2164

Phone: (02) 9604 7206  
Fax: (02) 9604 7256  
memberservices@wcra.com.au

20 September 2019

The Hon. Matt Kean MP  
Minister for Energy and Environment

Submission to email; 20yws@dpie.nsw.gov.au

**Copies** as a PDF to Mr Christian Dunk [christian.dunk@minister.nsw.gov.au](mailto:christian.dunk@minister.nsw.gov.au)  
And [christine.chalker@minister.nsw.gov.au](mailto:christine.chalker@minister.nsw.gov.au)

### **Invitation to provide views on the NSW waste system Your email dated 30 August 2019**

Dear Minister

Thank you for the invitation to participate in developing a 20-year Waste and Resource Recovery Strategy (20YWS) for NSW by providing views on the NSW waste system.

As previously advised, WCRA is a registered industrial organisation with the NSW IRC and the Fair Work Commission and has been since May 1948. We currently have 199 Members working across all facets of the waste and recycling industry in NSW and the ACT.

The following are comments are provided by our **C&D (Construction and Demolition) Member Group**.

#### **Key Issues and Barriers**

- **Certainty.** Businesses needs to know that if they invest in new technology to increase recycling in NSW that the regulations won't change for the negative. If they do need change, there needs to be an independent review board separate from the EPA that can look at any changes that impacts business. An example of this is recent changes to the Resource Recovery Orders. There is current discussion about further changes to the Recovered Fines Order. Recyclers have based their business model around the existing 2008 order and the current discussions will potentially stop the recycling of mixed C&D waste.
- **Asbestos.** Industry has been negotiating with NSW government departments for 18 years to resolve the issue of unexpected asbestos finds in recycled

products. NSW departments don't seem to be able to deal with the problem that other states have managed to resolve. This issue has the ability to stop the C&D industry from developing further. There have been several local government Councils that have stopped recycling brick and concrete because of the lack of clear governance on the asbestos issue.

- **Lack of appropriate land for recycling facilities.** No one seems to want to have a recycling facility in their area. There is a lack of suitable industrial land anywhere in Sydney for the variety of recycling businesses. Land in Sydney is also double the price it is in Melbourne and this makes it very difficult to start new businesses.
- **Lack of markets for timber waste sorted from mixed waste.** There needs to be extra support for this one waste stream. It makes up a large amount of the C&D waste and currently there is no solution. The obvious direction is to use it as fuel but there are issues with potential contamination from treated timber, resins in engineered wood and painted timber.

### **How to Reduce Waste and Recycle More**

- **Future Construction.** There needs to be consideration in construction for end of life use of materials. There are new products being used that are not recyclable. Alternative products are recyclable. It should be mandated that only recyclable materials should be used where a recyclable option is available. Also mandating producers not to use packaging that is not recyclable.

### **Main Opportunities for Improving the NSW Waste System**

- **Independent Recycling Department.** There will be substantial improvement if government puts together a government department that looks after recycling and that is totally independent of the EPA. If government and industry put their heads together to work on solutions for more recycling it will happen. There will need to be a big push from government for this to happen. Industry has a lot of the solutions already however won't commit the investments without certainty or help from government.

An example of this is glass recycling. In a recent seminar held between industry and the EPA there was a presentation from the EPA showing how it is possible to use crushed glass in a number of applications like concrete and asphalt. The discussion after the presentations included the following issues;

- industry expressed to need for the glass to be washed and water discharged to sewer, requires support from the EPA.
- depending on what type of treatment is needed so that water can be discharged may make it not viable.
- there were comments from Council managers that stockpiling glass for recycling in regional NSW had lots of issues with facility licence conditions. The licences had stockpile limits however the reuse of the glass was limited on a regular basis. There would be road projects each year where the glass could be used however, they couldn't guarantee the volume needed if they couldn't stockpile.

These issues are all very easy to solve if the government wants to help solve.

We would welcome to opportunity to participate in the targeted engagement stage of this process such as roundtables and workshops to discuss the priority problems and solutions identified. However, before we arrive at this point and based on the significant investments and efforts by our Members, we hereby formally request a one-hour face to face meeting to present the above information. This will ensure that we effectively communicate and highlight our concerns and recommendations.

Should you require any further details please contact the undersigned.

Yours faithfully

Tony Khoury  
Executive Director