Dear Waste Inquiry,

Apologies for late comments –I have been on leave for the last 3 weeks.

Important: My comments on the Inquiry are personal only and therefore do not constitute the views of the NT Environment Protection Agency in any way.

My comments on the Waste Management Productivity Commission Draft Report are mainly arranged around Several Subject areas:

W2E and Waste Incineration in general:

- The report considers that waste incineration is to be supported –without a strong commitment to the screening of wastes for plastics (particularly PVCs) and other high risk chemicals of concern prior to burning. W2E plants should not be commissioned without strong controls over the waste feed entering the incinerator.
- There does not appear to be any incineration technology capable of removing all dioxins from the final waste air plume from W2E incinerators.
- There is substantial evidence of dioxins producing genetic effects in at least the 2 kilometre radius of dioxin producing incinerators in the literature, effects such as increased twinning have been noted as statistically increased.
- Given the strong bioaccumulating nature of Dioxin and its possible cytotoxic and other genetic effects, and the use of other waste management technology –such as land fill, I do not believe W2E incinerators should be supported by Australia.
- Given the now widespread use of plastics and other chemicals with high risk chemical biproducts from burning, and the increased complexity of the waste stream, I believe it is economically non-viable to separate wastes to remove high risk materials from the waste stream being delivered to incinerators. I believe this position is supported by the public documentation surrounding the recent Brighton W2E proposals assessed by the DPIWE in Tasmania.
- Guidance on incineration and particularly incineration by products needs to be produced by the Australian Government before a commitment to broad scale W2E and waste incineration should be recommended.

Solid Waste Focus

- The document did not include liquid wastes, trade wastes, and wastewater treatment which is economically inappropriate as wastes can be shifted between these two streams, especially through backyard operators and any manholes, sewer maintenance access hatches.
- Life cycle analysis was given poor coveridge as a way of reducing the complexity and environmental footprint of products.

Waste Hierarchy

- The waste hierarchy was clearly never intended for complex waste types such as a domestic television or computer.
- The waste hierarchy is very good when applied to wastewater recycling –which is a very simple waste stream with non-complex transport, demand/supply economics, and can deliver obvious economic benefits to nearly any community in the driest inhabited continent.
- The document did not discuss wastewater treatment systems, trade waste or water recycling as a waste stream in much detail.

- Please include this waste disposal stream as in my experience any economic imposts or disincentives delivered to the “solid waste sector” can be experienced as a sudden macerated liquid waste increase in the ‘liquid waste sector”.

Economics

- Transfer of waste from solid waste stream to liquid waste stream through economic disincentives does not appear to be covered by the document.
- Is waste becoming more toxic? Future technology costs need to examine these issues.
- Is waste becoming more complex and harder to separate? Future technology costs need to examine these issues.
- The “natural monopoly” of waste is false. It is far easier to transfer wastes between solid and liquid wastes than this report makes out. The installation of one domestic “insinkerator” in a kitchen sink turns a composting/landfill household into a household delivering 50-200% higher loads on the sewerage system/aquatic environment/farmer.

Cheers david

David Dettrick
NT