25 August 2006

Waste Generation and Resource Efficiency
Productivity Commission
Locked Bag 2
Collins St East
Melbourne Vic 8003

Dear Sir/Madam,

The Treated Timber Product Stewardship Group (TTPSG) welcomes the opportunity to comment on the *Draft Report of the Productivity Commission's Inquiry into Waste Generation and Resource Efficiency*.

The TTPSG has representatives of all parts of the treated timber industry from forest growers, chemical suppliers, producers, treaters, importers and retailers and includes representatives from:

- Forests NSW
- Forests Products Association (FPA)
- Koppers Arch and Osmose Australia
- Timber Preservers Association of Australia (TPAA)
- Australian Timber Importers Federation (ATIF)
- Timber and Building Materials Association (TABMA)
- Timber Development Association of NSW (TDA)

We consult closely with the Department of Environment and Conservation (NSW) on extended producer responsibility for treated timber, which has been listed as a 'waste of concern' by the Department.

The TTPSG is generally supportive of the content and draft recommendations in the draft report so our comments are restricted to four specific points:

1. Introduction
2. Draft Recommendation 7.1
3. Draft Recommendation 10.2
4. Draft Recommendation 13.1

These comments are contained in the following pages.

Yours Sincerely,

Andrew Dunn
Chair - Treated Timber Product Stewardship Group
General Manager – Timber Development Association (NSW)

Introduction

We request that CCA treated timber be removed from the list in the Introduction titled "Hazardous waste that might be found in municipal solid waste" on Page 5 of the Draft Report. We have a number of reasons for this request.

- CCA treated timber has not been defined by government bodies as a hazardous waste
- The constituents of CCA treated timber cited in the report are also present in a large range of other consumer products found in municipal waste
- It is unclear what circumstances were used to collate this list

CCA treated timber is not hazardous waste

Timber treated with CCA and disposed of by householders in municipal waste is not classified as hazardous waste in any state of Australia.

Therefore, CCA treated timber should not be listed in a table titled "Hazardous waste that might be found in municipal waste".

On a related point, the TTPSG feels that, as many of our members operate nationally, there are some significant benefits in harmonising the waste classification system across Australian jurisdictions.

Consumer Items

The constituents of the CCA preservative with which treated timber may be treated with are copper, chromium and arsenate. There are a range of products and materials (including food and soil) that contain naturally occurring quantities of these elements. According to the Department of Environment and Heritage National Pollutant Inventory database[1], these elements, and compounds containing them, are also present in a large number of consumer items. See table 1 below.

Element	**Consumer product**
Consumer products that may contain copper & its compounds	Coins; jewellery; electrical appliances; cookware; some unwashed agricultural products; some commercial gardening products; some vitamin / mineral dietary supplements
Consumer products that may contain chromium (III) compounds	Some textile and some leather products
Consumer products that may contain chromium (VI) compounds	Some inks, paints and paper; some rubber and composite floor coverings; some treated (preserved) timber products; some toner powders used in copying machines
Consumer products containing arsenic or arsenic products	Pesticides; fungicides; weed killers as well as preserved wood and wood treatment products

[1] http://www.npi.gov.au/cgi-bin/npidbsearch.pl?proc=substance

Table 1 Consumer products containing copper, chromium and arsenic and their compounds (Source: *Department of Environment and Heritage - National Pollutant Inventory*)

Given the array of common consumer products that contain various levels of these three elements, as well as garden waste which may have been treated with pesticides and fungicides (and which is commonly contained in municipal waste) we think it unreasonable to specify CCA treated timber on this list.

Circumstances

It is unclear what the circumstances are that are the basis for the listing.

If circumstances are that municipal waste is used to produce energy or is disposed of by incineration, there are a multitude of common household items that could become hazardous under such conditions, even common plastics and paper.

Similarly, there are a many household products containing compounds that may have "hazardous characteristics" if municipal waste is going to be processed into recycled products for application to land.

If circumstances are OH&S considerations for manual sorting of recyclables from the municipal waste, pool chlorine or syringes are but two examples of several other items that can be found in municipal waste that would exhibit hazardous characteristics.

The TTPSG's view is that it is more helpful to concentrate on the general compounds and elements that could be problematic in *specific* circumstances, rather than raising general circumstances and listing specific products.

In our discussions with the Department of Environment and Conservation (NSW) we gather the problem is that, in some circumstances, some wastes can cause problems in improving the recovery of municipal waste for beneficial uses. If this is the problem a more suitable title for this table may be 'Some problematic wastes that might be found in municipal waste'.

Please note that the timber industry is actively working with the Department of Environment and Conservation (NSW) and the resource recovery industry to prioritise, identify and remove, if appropriate, problematic treated timbers from the waste stream so that more waste can be recovered for beneficial uses.

2. Draft Recommendation 7.1

> *Governments should not allow the priorities suggested by the waste hierarchy to override sound policy evaluation principles based on a net social benefits approach. All of the costs and benefits of alternative waste management options should be carefully evaluated.*
>
> Draft Recommendation 7.1

We support this recommendation as we believe all costs and benefits of alternative waste management should be carefully evaluated before decisions are made about these alternatives.

There is already an excellent market in second-hand timber and there are increasing quantities of waste timber being recycled into particle board, mulch and fuel products on a sustainable basis. The timber industry has also sponsored research into the use of thermal processing – combustion – as a means of recovering energy and CCA treatment compounds.

Waste timber also has a benefit when it is buried in well-designed and managed landfills. Research by the CRC for Greenhouse Gas Accounting[2] has shown that waste timber deteriorates much more slowly in landfills than commonly assumed. This research indicates that waste timber can sequester carbon for much longer periods than previously thought.

All these benefits need to be carefully evaluated before alternative options are chosen.

3. Draft Recommendation 10.2

Product stewardship schemes for computers, televisions and tyres should not be introduced without robust evidence that:

** there would be a net benefit for the community*

** other policy options would not deliver a greater net benefit.*

This is particularly the case if a mandatory approach – involving either industry-government co-regulation or government regulation – is being contemplated.

Draft Recommendation 10.2

We support the recommendation. While acknowledging that there may be social and environmental reasons for introducing EPR and product stewardship schemes, for the reasons stated above, we support the recommendation that a net benefit to the community needs to be demonstrated, particularly if a mandatory scheme is under consideration.

4. Draft Recommendation 13.1

The Environment Protection and Heritage Council should coordinate the development of a concise, nationally consistent, data set for waste management that would facilitate evaluation and comparison of waste management policies across jurisdictions. It should have regard to data collection practices already in use.

Government-funded data collection on waste management should focus only on the data needed to address important policy issues such as those identified in this report

Draft Recommendation 13.1

We strongly support this recommendation. However; we feel that the recommendation could be stronger and more specific.

It is not enough that data should be nationally consistent. Data collection methods also need to be of a high quality so that the data gathered can be used to make informed decisions. This is particularly the case if industry is being asked to make investment in programs to increase recovery of waste materials.

For example, the timber industry is now in a position to develop a national strategy to address waste timber. We need good quality national data to be collected on disposal of waste timber, which includes the level of contamination (chemical and physical) as well as how the waste is presented (eg., size, shape, condition). This data is necessary for performing informed cost benefit analysis as well as assessing the environmental impacts of alternatives to current practices.

Governments, as the licensing authorities and often the operators of landfills and other waste facilities, are best placed to audit the waste being taken to these facilities. Audits of the

[2] http://www.greenhouse.crc.org.au/counting_carbon/wood.cfm

disposed waste at these landfills and other waste facilities need to use statistically valid and robust sampling methods. The methodologies used should be verified by qualified, independent third parties. Material categories need to be standardised and the waste streams need to be characterised by separation and weighing, with appropriate chemical testing of sub-samples.

We are aware of audits performed by DEC (NSW) on construction and demolition waste presenting at landfills in Sydney that used weight-based methods complimented by chemical testing of timber samples. The preliminary data from this audit is proving invaluable to us in our decision-making.

This method can be contrasted with some of the data collection practices already in place.

For example, visual-based methods of auditing, with no chemical testing, is a very common method of waste auditing throughout Australia for waste from commercial and industrial (C&I) and construction and demolition (C&D) sources. The data gained from this method, particularly for waste timber, is subject to very large errors. While this method may be useful for general reporting purposes by government departments, they are not particularly useful for making sound investment or environmental decisions.

Also, data collected on municipal waste is not sufficiently well-designed to pick up the often very small quantities of waste which could be problematic in recycled product made from such waste, eg., car batteries, pesticides, syringes, smoke detectors etc. The focus of these audits is often on the large bulk of materials such as newspapers, packaging etc. We feel that these audits can be cost effectively better designed to pick up the small quantity of problematic wastes which are seen to be inhibiting increased recovery.