Our Ref:

Enquiries: John Falzon (08) 8363 0100

8 February 2006

Waste Generation & Resource Efficiency Inquiry Productivity Commission LB2 Collins Street East MELBOURNE VIC 8003

By Email: waste@pc.gov.au

Dear Sir / Madam,

Waste Generation & Resource Efficiency Inquiry

Thank you for the opportunity to provide feedback to the Productivity Commission regarding waste generation and resource efficiency in Australia. With reference to the relevant issues paper, we provide the following brief comments:

Section 5 of the issues paper discusses the greenhouse gas emissions from landfills as being a negative externality of waste disposal. LMS question why this is considered a negative if the landfill gas is harnessed and / or used to produce renewable energy, effectively dealing with the greenhouse emissions.

In relation to Section 6, there are many economic, environmental and social benefits associated with the recovery of energy from waste including employment, rehabilitated land, cleaner air, and reduced greenhouse gas emissions. The recovery and recycling of non-organic materials is a positive step towards resource efficiency, however, the removal of organic materials from landfills for placement into special anaerobic digesters is merely replicating the function of existing landfills, and at considerable cost.

The goal of achieving a complete zero waste society is not achievable in the near future. We would be much better served to target a continuous reduction of waste and emissions, and build on this each year.

Productivity Commission 8 February 2006

LMS

Landfills play an important role in the waste industry in Australia, and, whilst non-organic materials can effectively be recycled, the inclusion of organic materials within the landfill waste stream can make more effective use of landfills, by enhancing the production of methane gas, which can then be converted into renewable energy. This makes efficient use of existing infrastructure and does not detract from the reduction of waste or recycling of non-organic components.

LMS appreciate the opportunity to provide input on this important issue and commend the Australian Government for instigating a review of waste generation and resource efficiency in Australia.

Please don't hesitate to contact me should you require any further information or clarification.

Yours sincerely,

MANAGING DIRECTOR John Falzon