



WASTE CONTRACTORS &
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OF N.S.W

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The Hon. Matt Kean MP, Minister for Energy and Environment

By e mail as a PDF file to the Minister's Staff

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Copy by e mail to all Members of WCRA's Executive

A definition of the waste management industry

Dear Minister

On behalf of our Members and in the best interests of the community it's important in these uncertain times that if the NSW Government makes any broad lockdown decisions that the collection, transport and disposal of waste & recyclables is not impeded.

Everyone across our community is currently facing some very difficult & challenging public health issues. In the waste management industry, throughout this time (and as always) our Members are at the frontline of providing an essential service to householders and those businesses that continue to trade. Without the efforts of our Members and their wonderful workers, we would be faced with major health, hygiene and sanitation issues.

In some cases, such as concrete recycling and scrap metal recycling, our Members provide valuable feedstock for infrastructure and manufacturing resulting in significant economic and employment activity.

UN Environmental Programme, Geneva, 24 March 2020 Waste management an essential public service in the fight to beat Covid-19

Link

<https://www.unenvironment.org/news-and-stories/press-release/waste-management-essential-public-service-fight-beat-covid-19>

Extract

With the coronavirus disease (Covid-19) pandemic continuing to spread and its impacts upon human health and the economy intensifying day-by-day, governments are urged to treat waste management, including medical, household and other hazardous waste, as an urgent and essential public service in order to minimise possible secondary impacts upon health and the environment.

Proposed industry definition

We recently had an exchange of e mails with your office, however as it is critically important to ensure that these matters are dealt with promptly & accurately, we now make this formal request for your review and consideration.

A modern definition of our industry exists in the Waste Management Award 2010, where Waste Management Industry means the collection, transportation, handling, recycling and disposal of any waste material whatsoever (be it solid or liquid, organic, biological, medical, raw or natural, wholly or partly manufactured, decomposed or partly decomposed or in any other state or form and including all domestic, trade and industrial waste) and includes the operation of transfer stations, landfill sites, incinerators, recycling depots,

yards or terminals, treatment plants, compost facilities, alternative waste treatment facilities and the operation of other facilities of the same kind.

This definition much better reflects our industry and is better than what exists in the Essential Services Act, which states our industry as being 'garbage, sanitary, cleaning & sewerage services'.

WCRA is calling on the NSW Government to consider adopting this more modern Award definition and to confirm such in a letter that is addressed to all stakeholders.

Scrap metal recycling sector

We draw your attention to a sector within our industry that needs urgent and special consideration due to its role in the critical steel and aluminium making industries, the metal recycling industry.

NSW is home to three major steel mills and two major aluminium smelters manufacturing new products for use throughout the construction, transport, mining and manufacturing economies within Australia. These facilities are also significant contributors to Australia export economy. Most of these major steel mills and smelters are totally reliant on recycled scrap metal for their material infeed. These mills are significant employers in NSW.

If NSW it is unclear whether metal recyclers are deemed to be an essential service (under the provision of 'garbage services' under the NSW Essential Services Act (1988)).

If there is an interruption in the supply of scrap metal services, NSW steelmakers would be forced to import processed scrap metal as feedstock in bulk marine cargoes (30,000 tonne + cargoes) in replacement of locally supplied volume. This presumes that they can source this feedstock at all given the current global environment. Sourcing feedstock from outside of NSW will attract a significant lag time and it is just not feasible to simply shut down steel mills due to the massive cost and downtime that this action will trigger.

Added cost and reduced local recycled scrap availability to the steel manufacturing industry in NSW will do nothing to improve its sustainability in what is already a hyper-competitive global market and the impacts will be felt across the critical manufacturing, infrastructure, construction and mining industries. The stockpiling of non-recycled metals will also have a significant impact on industry, commercial, residential and local government stakeholders as well as the environment.

Accordingly, in the event that lockdown measures are implemented across NSW, we would like your consideration of these matters to ensure on-going business by the NSW scrap metal sector.

We also request that confirm the status of this sector in a letter that is addressed to all stakeholders.

In closing, should you require any further details, or if we can assist, then please have your staff contact me.

Yours faithfully,



Tony Khoury
Executive Director