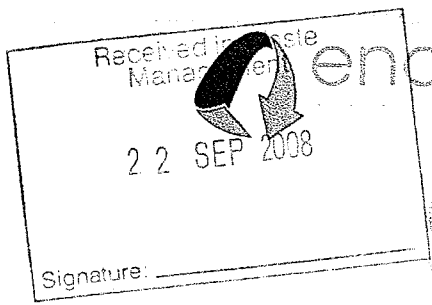


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17th September 2008

Mr. Barry Carbon, Members of the Waste Authority,

Response to request for submissions on the status of the levy on Category 63 (inert) waste

Thank you for the opportunity to make submissions to you on the matter of the levy on inert waste to landfill in Western Australia. Whilst I did ask this question verbally at the forum on Tuesday 9th September 2008, I still feel that greater detail could have been provided.

As an environmental consultant and small business owner in the Perth region, I am not affiliated with any group or company in either the landfill or the construction and demolition material recycling industry. My interest in this matter stems from my desire to see Western Australia fulfil its potential in becoming a State where waste management is conducted with the highest environmental outcomes possible.

I wish to express my astonishment and concern at the decision taken by the newly incumbent Waste Authority to 'hold' (or freeze) the levy at \$3/m³, despite the fact that the levy on Category 63 waste was scheduled to increase to \$5/m³ in July of this year. My concern stems from the apparent lack of due process followed in making this decision.

It is not standard practice to hold only one forum *after* a key decision has been taken and to request only written submissions and *only* from the attendees at the forum. This does not constitute the full and fair consultation that the industry should be able to expect on such a significant matter.

The decision to freeze the levy on inert landfill is a direct contradiction of previous policy statements from the Minister, the State Government and the former Waste Management Board. The outcome has been to damage and destabilise the entire recycling industry in Western Australia. Are you aware that several recycling and waste management companies in WA had recently decided to invest in infrastructure and business development, but have since revoked these decisions on the basis of uncertainty surrounding the future of the landfill levy?

I respectfully request that a clear description of the process that led to the decision being taken to freeze the landfill levy on inert material; including the way that appropriate information was recorded and communicated is provided to all stakeholders in the waste management and recycling industries in Western Australia.

Please feel free to contact me should you require further clarification on this matter.

Yours sincerely

Dr Anne-Marie Bremner
Director, Encycle Consulting P/L

cc. Keiran McNamara, Director General Department of Environment and Conservation