



*Local
Government
Association
of the
Northern
Territory*

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David Hatfield
Director Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Dear Mr Hatfield

LGANT SUBMISSION TO THE PROPOSED NATIONAL VOLUNTARY TYRE STEWARDSHIP SCHEME

The Local Government Association of the Northern Territory (the Association) appreciates the opportunity of making comments on the Tyre Product Stewardship Scheme (the Scheme).

The Association is the peak body representing the interests of, and providing a voice for, the 11 shire and 5 municipal councils in the NT. It coordinates activities on behalf of the local government sector as well as performing functions for other spheres of government that are designed to enhance the capacity of local government in the NT.

The Association is also represented on the Board of the Australian Local Government Association, which represents the interests of Local Government Associations nationally.

Local government makes a significant contribution to the Northern Territory economy by:

- collectively employing 3,000 people
- managing and controlling assets valued at over \$900 million
- receiving and expending over \$380 million annually.

Councils are sensitive to changes in their operations, particularly if increased costs are incurred and councils are not given time to plan for such changes. This has been highlighted in the recently released report on remote shire financial sustainability in the NT.

Local government in the NT also recognises the need to implement actions to reduce landfill volumes and to separate hazardous wastes such as tyres, especially in remote areas and homelands where burning of the 'tip face' is still practiced.

There are two aspects of the Scheme that are of interest to local government in the Northern Territory:

1. it is a user of tyres in providing services for constituents through the use of light and heavy vehicles
2. its management of waste facilities with the responsibility to ensure disposal of tyres in an environmentally sustainable and responsible manner.



The Association supports the initiative in principle but has reservations as to the success and sustainability in the NT especially in remote areas due to transport costs and lack of volumes for industry viability.

Solid Waste Facilities:

Most of the waste in the NT comes from the Greater Darwin Regions (Darwin, Palmerston and Litchfield council areas). The Shoal Bay Waste Disposal Facility (owned by the City of Darwin) services these councils with estimates indicating that it receives about 98% of the waste, thereby acting as a default regional Waste Facility.

There are a number of smaller licenced landfills owned and operated by councils and both Katherine and Alice Springs councils are further investigating capacity and business plans around expanding to Regional Waste Facilities, even though land availability is very low.

Waste disposal (landfill) facilities generally include an open pit for rubbish disposal, green waste recycling/mulching, metal/whitegoods recovery, building material recovery, hazardous waste disposal and other various separation/recovery/recycling schemes.

Recycling options are readily available in the municipal areas of Darwin, Katherine, Tennant Creek, Alice Springs and Nhulunbuy but recycling rates are still significantly lower in these areas compared to the rest of Australia.

Historically, Natural Resources, Environment, the Arts and Sports (NRETAS) has only required communities with a population exceeding 1,000 to acquire a landfill licence so the Association developed guidelines for waste management for communities with a population of less than 1,000 and these have been adopted as policy by the Association.

It is estimated that there are about 300 unlicensed landfills in remote areas across the NT, many of which were established decades ago with little consideration for the surrounding environment, located near water sources or they are seasonally inundated by surface water. Leases and land tenure over these sites creates a significant barrier to local government being able to comply with licencing requirements.

There are a number of other considerations for the scheme in remote areas of the NT with the waste generated by pastoral stations and mining companies as this is generally managed on-site and without any involvement from local government.

Specific Commitments for Local Government:

Roll out of the scheme to rural and remote areas will be difficult and collaborating with other product stewardship schemes and industry will be problematic. One such stewardship initiative, 'Waste Oil' failed expectations due to distances from major centres making it unsustainable. Projects of benefit and sustainable such as 'Chemclear' should be looked at and not exploited for political gain.

The Association has been working with Top End Tyre Recycling Pty Ltd to promote baling of tyres for use in civil projects in remote areas with minimal success. The Tyre Stewardship Scheme could play a role in promoting and assisting with coordination of this type of initiative.

There is already a disposal fee paid by customers when purchasing new tyres and there needs to be transparency in reporting to customers on how much of this fee goes into the disposal and re-use of end-of-life tyres.

In summary, the Association is in a position to support industry in the promotion of the scheme within the local government sector and supports the initiative but it has reservations as to the sustainability and participation rates it will get in regional and remote areas in the NT.

The contact person at the Association for this submission is myself and I can be contacted at peter.mclinden@lgant.asn.au or by telephone on 08 8944 9691.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter McLinden', written in a cursive style.

Peter McLinden
Manager Transport and Infrastructure Services