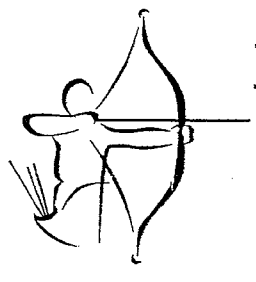


DEC 8210
DOC 63430

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Bowman & Associates Pty Ltd

ABN: 22 112 399 514

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PO Box 2059
ROSSMOYNE WA 6148

Received in W.
Management

25 SEP 2008

Signature: _____

Tuesday 23rd September 2008

Chairman
Waste Authority
C/- Environmental Protection Authority
Locked Bag 104
Bentley Delivery Centre WA 6983

DEPARTMENT OF ENVIRONMENT
& CONSERVATION

24 SEP 2008

Corporate Information Section
ATTENTION

Attention: Mr. Barry Carbon.

Dear Barry,

RE: Inert Landfill Levy

Through my company Bowman & Associates Pty Ltd I provide waste management consultancy services to the waste management industry and Local Government in WA. In response to your request at the recent Landfill Levy Forum held at the Esplanade Hotel in Fremantle regarding changes made to the Inert Landfill Levy, I offer the following comments.

1. It was my expectation, as was the expectation of the greater waste industry in Perth, that the inert landfill levy would be increased to \$5.00 per m3 in July 2008.
2. The freezing of future increases to the Inert Landfill Levy in the Waste Avoidance and Resource Recovery Levy Regulations 2008 contradicts the direction of past initiatives undertaken by the State Government of WA in working *Towards Zero Waste*.
3. The Landfill Levy should be the same for all waste types going to landfill.
4. The Landfill Levy should be based on the whole of life assessment of the waste generated and not based on revenue requirements of the Waste Authority.
5. A minimum Landfill Levy in the order of \$50 per Tonne should be adopted for all waste going to landfill in metropolitan Perth in 2008 regardless of the waste type.



A minimum Landfill Levy of \$50 per Tonne can easily be justified when considering the following:

Municipal Waste

A Perth household generates approximately 1.4 Tonnes of municipal waste per annum. A Landfill Levy of \$50 per Tonne equates to \$1.34 per week per household.

Commercial and Industrial Waste

A small business with a turnover of \$500,000 per annum could generate 3.0m³ of waste per week. With an average density of 80kgs per m³ for commercial waste the small business could generate 12.5 Tonne of commercial waste per annum. A Landfill Levy of \$50 per Tonne equates to an additional cost of \$12 per week for waste disposal.

Construction and Demolition Waste

A construction company that chooses not to recycle and to send building waste to landfill could generate 30 Tonne of waste per house construction. A Landfill Levy of \$50 per Tonne equates to \$1,500 per house construction. For a house with a construction cost of \$400,000 the Landfill Levy for inappropriate building waste disposal would equate to less than 0.5% of the cost of construction.

In all three of the above examples the cost to the consumer of imposing a \$50 per Tonne Landfill Levy on all waste going to landfill would not be an imposition when you consider the resulting opportunities to retain the captured energy within the waste stream and the reduced environmental impact from a reduction in landfilling.

Thank you for the opportunity to provide comment and should you wish to discuss this further please do not hesitate to contact me on 0402 373 582.

Yours Sincerely,

Bruce Bowman
Director