

[REDACTED]

From: Inquiry into Recycling and Waste Management [REDACTED]
Sent: Thursday, 9 May 2019 11:14 PM
To: recyclinginquiry
Subject: New Submission to Inquiry into Recycling and Waste Management

Inquiry Name: Inquiry into Recycling and Waste Management

MR Robert Heron
[REDACTED]

[REDACTED]

SUBMISSION CONTENT:

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Australia ratified the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal in 1992 but did not sign the 1995 amendment. We are however bound by OECD Council Decision [C(2001)107/FINAL]. The notion that Victoria is only now looking to deal with the problem of illegal toxic waste smuggling points to massive failures within Victorian customs, the EPA, Federal Police and ASIO in regards to the inherent fact that the Victorian government has for some time now been illegally funding organised criminals through their sophisticated waste smuggling and illegal miscategorisation of waste schemes.

The Chinese Laws are not new, but the 23 year old 1995 revision of the Basel Convention.(Zarsky, 2010.) As such, This waste crisis in Victoria has nothing to do with the Government of the Peoples Republic of China but everything to do with the Victorian Government's complicity with organised crime. The first prosecution of waste smugglers under the Basel convention was in 1996.(**走私案 ((1997) 沪高刑终字第22号)) Victoria has had ample time to respond and adapt.

I must remind the commissioners that such activities will only lead to something reminiscent of Ming Flannagan's offer within the Dáil Éireann in 2013 to Fergus O'Dowd regarding the proposed water services bill. Toxic steel sent for recycling will only make its way back into the commodities market to eventually return to Australia.(Schwägerl, 2009.) When Cadbury Schweppes lost industrial ionising radiation sources, in 2008, a Department of Human Services spokesman stated, "...the material does not constitute a health risk because it is in landfill or has been smelted down." The article suggested it had probably been lost when it was sent with other scrap metal to China. The article does not mention if the Chinese government was notified. (Fyfe, Melissa 2008)

potentially a large number of Security Enhanced Sources have been lost. In South Australia, a 2003 audit of such sources found an unspecified number of lost sources concluding that they were potentially sold as scrap metal. Two gauges were stolen and never recovered. I urge the committee to contact federal security agencies to determine the extent of this problem. how many radioactive sources have entered the recycling

stream and exported? I see no security issue with personnel or the public being informed of the frequency of such events.(EPA. 2003)

NORM Radioactive waste is not legally classed as an industrial waste. If exported it is likely to not be recycled. Australia produces a large amount of 'recyclable' NORM steel through its oil, gas and mineral exploitation and exploration activities. This waste is not recyclable but may end up being reused in agriculture or entering the recycling stream.(ARPANSA.2008. RHSAC 2005.)

Briefly i will address some absurd proposed strategies considered by other state governments. Tasmania, NSW and Queensland have mandated the use of reusable plastic bags. These need to be reused for a year in order to have an equivalent environmental impact but often aren't.(Kimmel. 2014) It's important to not commence the ban on plastic bags as is currently proposed as it is based on feelings rather than reliable studies on the environmental impact this is intended to have. Bottle deposit schemes have been investigated many times but have been rejected as the cost is higher. Ensure that you perform your duty to implement policy that is likely to have a positive impact rather than surrender to populist rhetoric.

This inquiry must be conducted in co-operation with the AFP. Government funding allocated to sophisticated organised criminal operations must cease. Victoria's waste disposal crisis has nothing to do with capacity but with the Victorian government's compliance with the law. A working paper should be produced in association with relevant stakeholders to assess the value per unit of recyclable goods to allow corporate accountants to assess whether a particular provider is a start-up or budget fly-by-night smuggling or otherwise criminal organisation. Such a working paper can aid in the prosecution of companies transferring their 'recyclable' goods to waste disposal companies where an obvious red-flag exists in the form of their pricing structure.

Zarsky, Lyuba. (2010) Human Rights and the Environment: Conflicts and Norms in a Globalizing World. page 210.

ARPANSA (2008) Management of Naturally Occurring Radioactive Material (NORM)

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Schwägerl, Christian(2009) Finds of Radioactive Steel on the Rise in Germany.

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Fyfe, Melissa (2008) Dude, where's our nuclear waste? <https://www.smh.com.au/national/dude-wheres-our-nuclear-waste-20081227-75x2.html>

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Radiation Health & Safety Advisory Council. (2005) Naturally-Occurring Radioactive Material (NORM) in Australia: Issues for Discussion http://www.alkane.com.au/wp-content/uploads/2017/09/Naturally_Occurring_Radioactive_Material_Discussion_Paper_for_ARPANSA_2005.pdf

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File1:

File2:

File3: