



6 June 2014

Mr Stephen Beaman
Director Waste Policy
Environment Protection Authority
PO Box A290
SYDNEY SOUTH NSW 1232

By email: waste.reform@epa.nsw.gov.au

Dear Stephen

Proposed Protection of the Environment Operations (Waste) Regulation 2014 - Regulatory Impact Statement (Consultation)

Thank you for the opportunity to comment on this amendment.

The NSW Business Chamber (the Chamber) is one of Australia's largest business support groups, with a direct membership of more than 16,000 businesses, providing services to over 30,000 businesses each year. Tracing its heritage back to the Sydney Chamber of Commerce established in 1825, the Chamber works with thousands of businesses ranging in size from owner operators to large corporations, and spanning all industry sectors from product-based manufacturers to service provider enterprises.

The Chamber acknowledges the importance of preventing the illegal dumping of waste. However, the current problems are clearly the result of the fact that the NSW Waste Levy is astronomically high in comparison to other states and far higher than the Productivity Commission's 2006 estimates of an appropriate value for pricing in the externalities associated with waste. Simply reducing the waste levy to more reasonable levels would be a far better solution to minimize illegal dumping of waste than proposals to introduce further regulation.

In terms of the specific details of the proposed changes, the Chamber supports the amendments proposed by Australian Sustainable Business Group (ASBG).

Additionally, the changes proposed by the EPA should be subject to repeal if they do not result in any significant reduction in illegal dumping. Significant capacity for illegal operators to simply ignore the rules is likely to remain and it would be counterproductive to force legitimate operators to bear the cost of ineffective regulatory protections.

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NSW Business Chamber
incorporates

- Sydney Business Chamber
- Australian Business Solutions Group
- Australian Business Industrial
- Australian Business Defence Industry Unit



For further information, please contact the Chamber's business regulation and economics adviser, Mr Tim Hicks on (02) 9458 7259 or at tim.hicks@nswbc.com.au.

Yours sincerely

[signed, Luke Aitken, Senior Manager, Policy]

for Paul Orton
Director, Policy and Advocacy