
From: Peter Bitto
Sent: Friday, 16 May 2008 11:33 AM
To: submissions
Subject: Mercury containing waste.

Sustainability Victoria.

Submission to the draft Metropolitan Waste and Resources Recovery Strategic Plan.

We are writing to urge you to take action to regulate the disposal of mercury-containing lamps.

We are currently annually disposing in Australia about 70 Million Fluorescent tubes ,HID Lamps and CFL's. 98% of all Mercury containing lights end up in landfill, representing about 2,000- 2,00 kg of Mercury, and up to 20,000 mt of glass, 500 mt of Aluminium and about the same weight of other metals and plastic.

Mercury is a potent neurotoxin, which in landfill is over time converted by the action of heat and bacteria into a volatile and much more toxic form of Methyl Mercury, which evaporates and is dispersed by the action of wind into our environment. Mercury which remains in landfill contributes to the dangerous heavy metals contamination of compostable material.

20,000 mt of Mercury containing lights discarded into our landfills every year seems inconsequential in comparison to the massive volumes of total material landfilled but as a single largest source of Mercury contamination, lighting waste has a disproportionately large, negative effect on all landfilled waste and on all of our environment.

In addition to Mercury contamination of landfill sites through unregulated dumping of Mercury containing lights, we are burying large volumes of energy intensive and high intrinsic value materials, rather than utilising the already present collection and recycling infrastructure provided by the private industry, thus not only do we contaminate our environment with Mercury but we also increase the landfill volume, contribute to greenhouse gas production and waste valuable resources.

Victoria contributes about 20-23 Million of the total 70 Million waste Mercury containing lights generated in Australia.

The Towards Zero Waste Strategy several years ago identified mercury-containing fluorescent lamps as a priority product for special attention due to the toxicity of mercury when it is released into the environment, and the potential greenhouse emission savings from glass and metal recycling. The environmental and resource recovery imperatives then identified, have since become more urgent.

In particular, the consumption of mercury-containing Compact Fluorescent Lights (CFLs)

will increase tremendously in the next few years as the community voluntarily acts to reduce its household greenhouse emissions through the use of these lights, and as incandescent lights are phased out. This household uptake of mercury-containing lamps means that these items are soon to become a municipal waste problem.

We believe that the Victorian government should be especially concerned about the dumping of toxicity of mercury into the municipal waste stream because its draft Metropolitan Resource Recovery and Waste Strategic Plan (Infrastructure Schedule) proposes up to seven Alternative Waste Technology plants. Several of these plants would produce compost and soil conditioning products – a key element of their expected environmental and economic benefits. The imminent increase in mercury-containing lamps in the municipal waste stream, however, raises serious questions about the environmental safety of any compost and soil products, and therefore about the business case for AWT.

It is worth reviewing the current state of recycling and consumption of spent fluorescent tubes and High-Intensity Discharge (HID) lamps. Currently, only about 2% of those items are recycled. The remainder ends up in landfill. A recent study by Hyder Consulting showed that Australians annually dump up to 70 million lighting products containing an estimated 2,000 kg of mercury. It seems that Australian governments are prepared to tolerate this risk even though just one gram of mercury (the amount contained in 4 large HID lamps) can contaminate up to 1 billion litres of water beyond safe drinking levels.

Meanwhile, the looming phase-out of incandescent lamps will increase the amount of CFLs in the waste stream by up to 80-86 million annually.

All of Europe, Scandinavia, Canada, Japan, most of USA, New Zealand and many Asian countries have legislated and implemented actions to limit and prevent uses, releases and exposures to mercury. As you are no doubt aware, our company, CMA Ecocycle has the capacity to collect and recycle all of the waste currently generated. The cost of recycling is between 1.5 - 5 % of the retail value of the product.

CMA Ecocycle operates collection and crushing plants in all States and Territories of Australia and in cooperation with a number of other waste management companies such as SITA, Veolia, TPI and others, is capable of delivering fast, efficient and cost effective collection and recycling services even to the most remote corners of the country. Ironically, the company is operating at a loss and well its below capacity due to the lack of Government support for recycling and landfill ban. The absence of such regulation means that we must compete with companies that collect and then landfill fluorescent tubes and other Mercury containing lights – a low-financial cost disposal option subsidised by Victoria's (and Australia's) environment.

We therefore ask you to work with other states and the federal government to place mercury containing lamps on the November EPHC meeting agenda, with a commitment to implement a national regulatory solution preventing land filling of mercury containing lamps and mandating recycling of those lamps. Without regulation to ban the disposal of these products to landfill, this practice will continue and mercury will continue to contaminate the environment and exact an opportunity cost for greenhouse emission savings and economic benefit to Victoria.

Yours sincerely

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