



20 April 2005

Director of Environmental Management  
Department of Primary Industries, Water & Environment  
Environmental Division  
GPO Box 44  
HOBART TAS 7001

Dear Director,

## **Submission – Proposed Controlled Waste Tracking System for Tasmania**

I am writing on behalf of the Tasmanian Farmers & Graziers Association (TFGA) in response to your policy paper for comment on The Proposed Controlled Waste Tracking System for Tasmania.

Based on the information contained within the policy paper, farmers would be classified as generators of controlled waste, primarily because they are users of pesticides and herbicides, but also because they create other controlled waste products such as waste oil and used tyres. The classification of farmers as generators means that they would need to comply with the proposed internet based controlled waste tracking system and this is undesirable for a number of reasons.

Firstly, the system that is proposed would significantly increase the administrative burden placed on farmers. Farmers are already burdened with a plethora of regulatory requirements and to add another prescriptive impost is unreasonable. This is particularly relevant on family owned and operated farms, where in many instances there are no employees.

In relation to the disposal of chemicals and chemical containers, many farmers currently utilise programs such as *drumMuster* and Chemclear. These programs already assist farmers with the responsible disposal of unwanted chemicals and chemical containers. The requirement for farmers to complete additional paperwork under the proposed controlled waste tracking system is duplication of effort and the imposition of additional paperwork in these areas would totally compromise the use of these programs. It should be noted that the TFGA, via the National Farmers' Federation, were instrumental in the development and implementation of the *drumMuster* and Chemclear programs as farmers and their representative bodies recognise the need for the agricultural industry to be responsible managers of the environment.

The policy paper does not make any reference to minimum absolute quantities of controlled waste that would be captured by the tracking system and this is not a palatable concept. Farmers, like many other businesses, will generally produce smaller or incidental amounts of controlled waste and the imposition of such an administrative system on these generators of waste is not practical. This has been recognised by the Queensland Environmental Protection Agency, who in the "*Seeking an EPA exemption for trackable waste*" document state that waste tracking provisions do not apply to the non-commercial transportation of less than 250kg of trackable waste, amongst other items.

Finally, the proposed implementation of an internet based tracking system assumes that every farmer, who is a generator of controlled waste, has access to the internet and/or knows how to use the world wide web and computers in general. This assumption is incorrect. The Chemclear program, for example, recognises that not all farmers have access to the internet or are computer literate. Their advertising material clearly states under the booking requirements that "If you do not own a computer, are not hooked up to the internet or are computer illiterate please contact our 1800 008 182 line for assistance."

Based on the above points, it is the position of the TFGA that farmers should be exempt from the controlled waste tracking system.

Should you choose to ignore our recommendation and impose the controlled waste tracking system on farmers regardless, it is imperative that minimum quantity levels be established, farmers receive adequate education and training on any new requirements, a paper system runs parallel with the internet system and farmers are given sufficient lead time within which to implement the new system.

The TFGA would ask that it be given the opportunity to discuss this submission in person prior to the finalisation of any legislation in this area, should the Government decide not to exempt farmers from the controlled waste tracking system.

Yours faithfully

A handwritten signature in black ink that reads "Greg Bradfield". The signature is written in a cursive, slightly slanted style.

Greg Bradfield  
**Chief Executive Officer**