

TRANSCRIPT

LEGISLATIVE COUNCIL ENVIRONMENT AND PLANNING COMMITTEE

Inquiry into Recycling and Waste Management

Melbourne—Thursday, 3 October 2019

MEMBERS

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Ms Georgie Crozier

Mr David Davis

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Dr Catherine Cumming

WITNESSES

Mr Geoff Hill, Chief Executive Victoria,

Mr David Taylor, General Manager, Property and Infrastructure, and

Mr Chris Gordon, General Manager Corporate Affairs, Stakeholder Relations and PMO, Bingo Industries.

The CHAIR: I would like to welcome our next witnesses, from Bingo Industries, Mr Gordon, Mr Hill and Mr Taylor. Thank you for making yourselves available. The Committee is hearing evidence today in relation to the Inquiry into Recycling and Waste Management and the evidence is being recorded. All evidence taken at this hearing is protected by parliamentary privilege as provided by the *Constitution Act 1975* and further subject to the provisions of the Legislative Council standing orders. Therefore the information you give today is protected by law; however, any comment you make outside this hearing may not be protected. Any deliberately false evidence or misleading of the Committee may be considered a contempt of Parliament. You will be provided with a proof version of the transcript in the next few days.

We have allocated 5 or 10 minutes for an opening statement. So I take it one of you will take the lead and then we will go to questions by the members of the Committee. Who would like to lead?

Mr HILL: Thank you very much. Thank you, Chair, and the Committee. I would first like to thank the Committee for the opportunity for Bingo to provide our views on the challenges facing the recycling and waste management industry in Victoria particularly, and for the opportunity to meet you today to discuss our submission that we submitted earlier. Before I get into the thrust of the submission I would like to provide the Committee with a short overview of Bingo and the sectors we focus on.

Bingo Industries is a fully integrated recycling and resource management company that provides solutions across the waste management sector. We entered the Victorian recycling and waste management sector only in 2017 through a number of strategic acquisitions. We have doubled in size since then, and hopefully by now most of you will have seen our bright orange trucks around the city. We offer sustainable recycling and waste management solutions, particularly in the building and demolition sector, such as brick, concrete, soil, timber and steel, and commercial industrial waste streams, with a clear strategic intent of diverting waste from landfill. To be clear, we do not participate in the MSW—or municipal solid waste—streams, kerbside recycling or organics.

Bingo's business model is underpinned by a recycling-led solution, which sets us apart from some of our major competitors in this market. Our collections business is supported by a growing network of recycling facilities with state-of-the-art processes and advanced technology. Bingo's network of facilities accept mixed waste that would otherwise be sent to landfill, achieve industry-leading recovery rates in excess of 75 per cent and create eight different materials for re-use back in the construction and demolition industry. By diverting waste from landfill to our resource recovery and recycling centres, we are helping to drive a circular economy and support the communities in which we operate. Our success to date has been built on these three key business systems of safety, environment and quality. All of these systems are externally certified to international ISO standards. Few in the Australian recycling and waste management industry can boast of this achievement.

We are proud to say that our systems in Victoria are also underpinned by this same standard set, and we are keen to see the Government work towards lifting the general compliance standards across industry more broadly. Bingo has ambitious long-term plans for Victoria, and we believe strongly the Victorian market generally has supported economic and regulatory drivers for this business segment. Over the past two years we have invested more in the recycling industry in this country than any other company. We have invested close to \$1 billion, including \$100 million in Victoria. Our new state-of-the-art facility in West Melbourne, which some of the Committee have visited, is a good example of this. We are also considering investing an additional \$50 million to \$100 million in additional recycling assets in the state, subject to the regulatory environment being sufficiently attractive to do this. This investment has a flow-on effect on the job market in the state. For instance, for every 10 000 tonnes of waste recycled there are 9.2 full-time jobs created compared to 2.8 jobs when sent to landfill.

Any investment of course of this magnitude will need to be economically viable and be backed by the certainty that a level playing field for all participants is enforced. On this point Bingo supports the Government's efforts to improve the recycling and waste management industry and notes the Government and its agencies, particularly Dr Cathy Wilkinson and her team at the EPA Victoria, and the team at Sustainability Victoria, do an excellent job in driving enhanced waste management outcomes. We understand the magnitude of change that implementing the *Environment Protection Amendment Act 2018* will entail and see the time between now and when the Act comes into force in 2020 as an opportunity to assist the Government in preparing the policy changes and guidelines affecting the industry.

Our submission to the Committee focused on the need to create a level playing field across the industry. Our significant investment to date in compliance measures must be supported by regulatory enforcement as well as increased penalties for non-compliance in order to encourage further investment. For example, we have invested significant capital, including the installation of thermal image technology and cameras, to ensure our West Melbourne facility adheres to new fire protection regulations. If non-compliant operators are able to continue operating without adhering to these regulations, it places compliant operators such as Bingo at a distinct disadvantage and discourages further investment. It also impacts operating costs, such as hire insurance, which is borne by everyone in the industry.

I go to the recommendations. Our first recommendation to the Committee was a material increase in the Victorian waste disposal levy. The levy provides the baseline on which all other waste disposal and recycling costs are based. Put simply, the higher the levy, the greater the incentive to invest in recycling best practice and increase the diversion from landfill. The current levy provides limited incentive for significant investment in alternative recycling technologies and encourages the use of landfill over initiatives to close the loop. So a significant increase in the levy to ensure that Victoria is consistent with its neighbouring states will further encourage recycling, and for this reason optimise the diversion of waste from landfill and promote the development of a true circular economy. As well as sending the right signals to industry, critically it also helps fund the EPA. This means the EPA is better resourced to regulate and enforce compliance in the industry as well as provide targeted grants to promote further investment. This will lead to greater investment in recycling technology, move Victoria towards international best practice diversion and ensure waste from other states does not enter Victoria to take advantage of this lower arbitrage on offer currently between the neighbouring states. Ultimately Bingo would like to see a standardised national waste disposal levy, but we recognise this is outside the immediate control of the Victorian Government.

Secondly, we believe the creation of the sustainable end-markets that create demand for recycled materials is critical to establishing a sustainable recycling industry. The Government is able to play a leading role in this area. By increasing the percentage of recycled materials required to be used on all Government construction and infrastructure projects and potentially all public and private projects over a certain value, the Government will establish a sustainable market for recycled products and promote further investment in recycling in the state. There has been much conversation around the sustainable end-market for materials that are likely to be impacted by China sword and similar bans from other Asian nations, such as paper, cardboard and glass. We are talking specifically here about products such as clean concrete, brick and concrete aggregate, timber and mulch, steel and plasterboard, and similar materials that can be re-used. Currently in Victoria there is little incentive to recover these materials and to make an investment decision in this regard. These products are actually low-hanging fruit and can quickly be scaled up to help close the loop and improve overall recovery rates in Victoria. This requires mandated usage and consistent product definitions. These criteria could very easily be incorporated into large infrastructure projects to get the ball rolling.

The third key point we would like to make relates to reporting and specifically to waste tracking and the integrity of reported recovery levels. Bingo supports the Government's drive to achieve its targeted recovery rates for various waste streams. Unfortunately many operators in Victoria claim to achieve impressive recovery rates with limited recycling infrastructure to support such rates and with no objective verification. Based on our knowledge and experience in both Victoria and New South Wales we do not believe many of the recovery rates that some operators claim. Bingo believes we are the only waste company in the country to have its recovery rates independently verified by a third party with a view to enhancing transparency within the industry and lifting the standards of waste reporting. Mandating third-party tracking of waste and auditing of recovery rates

and regulating minimum standards of recovery will promote greater scrutiny and lead to the production of better quality recovered materials.

Finally, Bingo believes recovery of energy from waste has an important role to play in Victoria's move to a circular economy. There will always be residual waste material that cannot be recycled economically, but this contains energy that can be captured and used productively. Currently the only viable option for this residual waste material is landfill. While there has been a lot of discussion around avoidance and re-use of packaging, we see every day at our facility, even with the most advanced recycling plant in Australia, how much residual waste still has to go to landfill even though a viable alternative such as energy from waste exists. The benefits of waste to energy include a net reduction in greenhouse gases, increased resource savings, improved diversion from landfill, reduced transport of waste and power generation to support intermittent renewable energy sources. There are a range of proven waste-to-energy technologies available that could be used for different waste streams in Victoria, and it would be inappropriate for the Government to mandate a single technology. Providing emission standards are met and the environment and safety requirements are achieved, best available technology will be used, and the process does not then cannibalise recycling activities. The Government should remain technology agnostic.

Bingo believes the suggestions made in our submission to the Committee which focus on the diversion of waste from landfill will lead to material and sustainable improvements to Victoria's recycling and waste management industry and in turn to the environment and the community. We look forward to receiving questions on our submission and would like to formally invite the Committee to also visit our new facility in West Melbourne to see firsthand the positive change Bingo is making to the industry. Thank you for your time.

The CHAIR: Thank you for that comprehensive presentation.

Mr HAYES: Thanks, Geoff. I have a couple of questions. What is the current percentage of waste from buildings—of the total percentage that goes to landfill, what percentage is made up from building remnant?

Mr HILL: Our waste stream in West Melbourne is largely building and demolition waste, and we recover 75 per cent of that across our network in Victoria.

Mr HAYES: And the remnant would go to landfill, would it?

Mr HILL: The remnant, the residual, is plastics and non-recoverable material and that goes to landfill.

Mr HAYES: So you do not know the total waste stream going to landfill that is made up of building refuse, do you?

Mr HILL: It is 25 per cent.

Mr HAYES: It is about 25 per cent, so it is a significant amount that goes to landfill. If we could re-use that, it would be a major achievement, wouldn't it?

Mr HILL: Absolutely, it would. When we see this material, it is energy rich and it is normally small and very combustible, and a feedstock for the energy from waste plants.

Mr HAYES: That brings me to the second point. What sort of material can be re-used? You did mention timber, plasterboard, bricks and mulch. What is left over that could not be recycled and would end up going to waste to energy or to landfill?

Mr HILL: I might answer that in two parts. What we do recover is the heavy materials, like the clean concrete, aggregate, soil, timber and steel. What is left over is lighter and a mixture of plastics or engineered timber or hard and soft plastics. There is still a journey in the industry to find product homes for engineered timber and some hard plastics. There is still opportunity to recycle more out of that residual, but there will always be a residual after that, and it is normally a mixture of small, unrecoverable timbers, plastic, paper and small bits of cardboard that you just cannot extract out with the facility.

Mr HAYES: Right. But it is still suitable fuel for waste to energy, though?

Mr HILL: I might ask David Taylor, as our development manager, to comment on that because he is the expert in the field.

Mr TAYLOR: When we receive a lot of our mixed waste, it is actually quite highly contaminated, so the papers and the cardboards that you would normally be able to recover are actually quite difficult to recover and do not really have any value in the market because people want very clean product to be re-used in the manufacture of those goods again. So exactly as Geoff said, hard and soft plastics, paper and cardboard and some textiles as well are the main ingredients of that residual waste.

Mr HAYES: There is one other thing; we were talking before about glass recycling, and a lot of people presented on using glass as a road-making base and we have just been talking about how it is probably better to re-use glass as glass, but re-using concrete could be used as a road-making base, I suppose, too.

Mr HILL: Correct. A lot of our conversations are with the likes of VicRoads and asphalt plants. They take the aggregate, and there is a small percentage of glass in that alongside the brick, the tiles and the other small fraction. Glass is not a big intake for us because it is coming from a construction site. So there will be small amounts of glass, and by then it is normally very small and behaves like an aggregate. There is a certain level that the road base can take that is glass, so it does go back into the construction input.

Mr HAYES: Where does the recycled concrete mainly go?

Mr HILL: So it goes back into crushed concrete. It is a feedstock for a concrete facility.

Mr HAYES: Re-used as concrete.

Mr HILL: Re-used as concrete. So you can sort of see it in two ways. The concrete goes into concrete, and mixed rubble or small aggregate goes into a road base, depending on its size and its strength and density. There are different classes that VicRoads apply to the different categories of material that we provide.

Mr HAYES: So if VicRoads or the Government said a certain percentage of all roadmaking base must be made from recycled material, you could meet that, with discussion about what the percentage is—

Mr HILL: Exactly. The interesting point—

Mr HAYES: But you would welcome it, I suppose.

Mr HILL: We would welcome it, we would. But the interesting point is that there is already certification that we are meeting in the recycle industry about the class quality. So we are meeting it as though it is the same as existing materials that are sourced from normal sources. So it is not a debate anymore about, 'Is it good enough?'. It is good enough, but it is not identified as recycled material. It is not tagged or treated or reported as such, and there is no demand or reporting on how much should be sourced from a recycle facility, and that is what is interesting; that is the gap which we want to close.

Mr HAYES: That is what you would want to see implemented. Yes, okay.

Mr HILL: Correct. Thank you.

Mr LIMBRICK: Thank you, Mr Hill. You have brought up something in your submission here that I have not seen in any of the other submissions, which is the scepticism of some of the reported recovery rates of other players in the industry. That sounds like that could be a big problem, depending on how bad that is, because they all aggregate up and end up reporting the entire industry recovery rate. What leads you to draw those conclusions? You do not believe some of the numbers that you are seeing, right? You must have some background to believe that that is correct. How widespread do you think that is?

Mr HILL: We do. There are two parts to our concern. The first part is that the recovered material is only a small part of the total waste stream. There is a lot of material that goes off the radar and is stored on a non-permanent site that is not tracked; it is not reported. So whatever is recovered is normally in good, licensed facilities that are recovering at a higher rate. So first there is the distortion on the total pool of the waste streams. As we have seen with SKM there are a lot of unknown warehouses with untold tonnes of unreported waste.

Mr LIMBRICK: So the denominators are off.

Mr HILL: The denominators are off, right.

Mr LIMBRICK: Right, I get it.

Mr HILL: And those compliant ones are recovering more, so it is skewed—first point. The second point is that people are meeting their clients needs knowing there is no ability to check. So if the customer says, ‘I need an x per cent recovery rate’, it is normally what they are told.

Mr LIMBRICK: So you go through third-party auditing. You use a consulting company or somebody to do that?

Mr HILL: We do.

Mr LIMBRICK: That is not common.

Mr HILL: That is very uncommon. We believe we are actually unique in Victoria. It is more common in New South Wales, but we think we are alone here in Victoria. We provide reports, and a lot of our customers come and audit our sites themselves, so it is very transparent. Those that have gone to West Melbourne can see it: it is real. But, yes, there is no waste tracking in the industry, so it is very hard for someone to follow waste streams to an end destination or a recycling facility.

Mr LIMBRICK: And so because some of those materials are going missing, and the denominator, you think that those recovery rates are inflated across the industry.

Mr HILL: Certainly skewed by that reason, and then probably inflated through commercial pressures that are known not to have any scrutiny on them.

Dr CUMMING: Do you mainly collect commercial waste or do you have a certain amount of public waste?

Mr HILL: Yes, it is mainly construction and demolition waste. When we say ‘commercial’ it is business and industrial waste but not residential waste. So when we say ‘commercial industrial’ it is an element of our waste stream in Victoria. Our biggest waste stream is building waste. Our next section is commercial industrial, which is what we call front lift or rear lift, which is where you see down the laneways of Melbourne and business parks and at the bottom of basements—that industrial waste collection. We do not do kerbside recovery, small wheelie-bin-type recovery.

Dr CUMMING: Do you have the capacity to actually take in building waste from the public sector in the way of trailer loads of household—

Mr HILL: Yes, absolutely, we do. We are licensed to do that and we service that sector.

Dr CUMMING: So you do?

Mr HILL: Correct.

Dr CUMMING: So currently, say, there are other landfill facilities that actually have their concrete going into landfill, you do have the capacity to actually close that loop and take that?

Mr HILL: Yes, please.

Dr CUMMING: Do you have any relationship with the other landfills to be able to encourage them to send their waste to you, being that you obviously have the closed-loop capacity where they do not?

Mr HILL: It is an interesting question. We have relationships with all the landfills, we have a relationship with a lot of other participants in the industry. Once it has arrived at the landfill it is really going to go into the landfill. They do not have a facility to separate it.

Dr CUMMING: Or it would seem that they do not even have the encouragement, if you can turn up there with a trailer load of bricks, by turning around and saying, ‘You shouldn’t be dumping it here in Werribee, you should take it down to West Melbourne’?

Mr HILL: No, I agree. The signals are not established like that. It would be unlikely though, that said, for someone with a good trailer load of bricks to take it to landfill. They would know enough, at volume, to take it to our facility.

Dr CUMMING: I would say the broader public would not.

Mr HILL: The public, correct. If it is within a small trailer load, I agree; they would not.

The CHAIR: Just on that, what is the incentive for someone to take a truckload to a landfill versus taking it to you? What is the difference?

Dr CUMMING: Or a trailer load?

The CHAIR: Or a trailer load?

Dr CUMMING: Because there are obviously a lot of small businesses out there that remove plaster or do smaller renovations or the like. How would they know about you? Why are they still going to the landfills in other areas? Why do they not know about you?

Mr HILL: Just to be clear, we are talking about small residential loads at this moment?

Dr CUMMING: Small operators, yes, trailer loads at a time.

Mr HILL: Partly we are new and partly we are getting our brand into recycling, and the sites are then increasingly well-known. One is, knowledge; second, they should come because of price. Because if it is a heavy load, a recoverable load, it will be cheaper almost by half than going to the landfill. The right pricing was already there for the gate price.

Dr CUMMING: I think there is a lack of knowledge in the community about you—

Mr HILL: There would be, yes.

Dr CUMMING: and by the smaller plumbers, plasterers, carpenters—like I said, smaller operations. But I also want to expand upon where you touched on illegal dumping. Obviously councils have a big issue around dumped rubbish and hard waste recycling.

Mr HILL: Yes.

Dr CUMMING: Is there a capacity where you could do hard waste? Is there a possibility? Because obviously a large amount of illegal dumping occurs in councils, and a lot of that illegal dumping is of trailer loads of plaster or trailer loads of small operator building materials, and some of these are stockpiled along rivers and wherever someone can sneak a trailer and dump a load to. Is there any capacity within your facility to do something about illegal dumping of hard rubbish?

Mr HILL: The problem of illegal dumping is left for either the landlord or the council to clean up, and we have been involved in more and more clean-up jobs. The material that is generally dumped in that category is very appropriate to be recovered actually within our facility, so increasingly we are getting asked to be involved in a clean-up, and we are happy and willing to do that. That is post event to help out, avoiding the dumping, absolutely.

Dr CUMMING: Big tracts of the world and the like?

Mr HILL: Yes, absolutely. We could be part of the solution at the front, and you would be employed to take that recoverable rubbish. Once it is identifiable as non-landfill and there is a recoverable element to it and it is the brick or the steel or the timber, it should go to a facility that is actually designed to recover it.

Dr CUMMING: So do you recycle plaster and—

Mr HILL: Plasterboard needs to be very clean. The current market demand for plasterboard—once it has got wet or organics or contaminated with timbers or brick and soil it does not have a market, so it depends. It has got to come from a clean source. We do if it is a brand-new demolition and they have separated at source, but it comes down to the quality of our customer and their knowledge of the waste stream source separation.

Dr CUMMING: I think there is obviously an opportunity to educate the public around what could possibly be recovered.

Mr HILL: Yes. I agree. You are right. Plasterboard is a heavyweight and it is currently largely landfill, so—

Dr CUMMING: And you would expect small operators, if they knew there was a cost benefit in—

Mr HILL: Separate it somehow. Yes.

Dr CUMMING: taking it to a facility in a clean way, to think it desirable.

Mr HILL: It is down to volume and lining up the supply chain, but it is all possible.

Ms TAYLOR: Apologies for coming in late. I apologise for that; I had to go to another meeting and come back, so I am sorry for that. I may overlap now, and if I do, you can tell me that I have done that. I am wondering, when people demolish buildings et cetera, I think when I looked at some of the renovations and stuff there is a time factor because they want to get their money back fast. The time factor of getting your money back fast versus material recovery, how do those two compete? Or do you find if people are aware of the value that they are more likely to demolish in a way that preserves what can be preserved?

Mr HILL: I think time is a factor, but space is probably a big factor. I think you are onto one of the theories—they have not got time to wait for all the streams to be separated. They just want it done and then to move onto the next phase, but that is all down to the scale of the site, the job. It is all possible. We move very quickly. We have 100 trucks on the road. We do 10 deliveries a truck each day. All of these things can happen very quickly on the site that needs it, so it is not really limited by that. To be honest, a lot of sites now are incredibly tight and they only have room for a limited number of bins to be separated on materials. If you look at any construction in the city, you wonder how they actually operate. There is one bin with a chute to it—this is the main tier 1s. It is a very tough job for them to do all this in a city and urban environment. In residential there is more opportunity. It is smaller scale, and there are maybe less incentives to go down to that nth degree of separation. But maybe they have got more time to do it and more space. If they were educated to do it, I think that would be the sector that should adapt.

Ms TAYLOR: Okay. So do you think education is the main lever, or do you think there are other levers that might drive people to behave differently, if you like?

Mr HILL: Education and knowing is going to be key. Price is always going to be part of it, but also, again, it is demand driven. In our minds a lot of this the customer will dictate. What we are saying about end-use materials is the same. If a domestic resident or a small owner of a development wants their developer to recycle more, they need to ask that question and then the developer will push it through its waste collection service provider.

Dr CUMMING: Through the Chair, I have got one quick one.

Mr HILL: Did that make sense?

Ms TAYLOR: Yes.

Dr CUMMING: So you do do house demolitions. If it was encouraged even through house demolitions—

Mr HILL: Whoever is the owner or the developer says we would require the supply chain to recycle X per cent or separate this, and the customer demands the change. The supply change is established, it is just the customer needs to drive the change.

Dr CUMMING: I think it is a lot to do with cost, and cost would drive it if there was a cheaper alternative to a waste solution for their cost and space and all of those things. I think there is a lack of communication and a lack of knowledge in either the demolition market, the smaller businesspeople market and even residential in the way of being able to remove that concrete driveway or that brick fence or that—

Mr GORDON: That is our point about the landfill levy—that currently, with the levy in the position it is, it does not incentivise recycling.

Dr CUMMING: I think it is a lack of knowledge that there are other facilities available too. When you think that there is only a tip in your area and you do not know of—

Mr GORDON: The alternatives.

Dr CUMMING: the innovative solutions like yourself around, I think people do not know that they are there. Otherwise I think most consumers would want to do the right thing because it is a cost. It is cheaper, so why not drive a little and do the right thing? You are doing the right thing and then you have got a cost benefit.

Mr GORDON: Saving, yes.

Mr HAYES: I just want to ask one further question. Correct me if I am wrong. I understand that in New South Wales any developer or building site has to submit a plan as to how they are going to dispose of all the waste. Would that help—to have such a system in Victoria—because then you would be forced to do some separation at the end or as the building process went on?

Mr HILL: Yes, you are correct, and it would help in Victoria as well. Again that transparency to the customer goes back to what we are saying—the education and knowledge. They probably do not realise where it is going; they do not even know it can be separated. If the developer is required to pre-plan on what recoverable materials are expected and the customer then says, ‘Show me that report’, it is the massive change we are looking for, because they will then make sure that their waste provider is going to turn up with the right bins and give them the report they need to satisfy their customer that it has been ethically and responsibly managed.

The CHAIR: One last question from me. I am interested in you sharing with us your interaction with various agencies. How did you find coming to Victoria in the last couple of years?

Mr HILL: I might answer in an operator sense. Dave has had also a lot of work in the planning sense. From an operator perspective, we have been very impressed actually, coming into Victoria, with the engagement with the EPA and Sustainability Victoria.

The CHAIR: But how do you find the difference with Sustainability Victoria, EPA, councils, various regulations? Do you feel there should be any more streamlining, a sort of one-stop shop arrangement? Do you find your interaction with various agencies can be confusing? If you compare that against other jurisdictions, do you see any room for improvement or changes, or do you not think there is any requirement for any changes with different regulation—WorkSafe, EPA, councils, DELWP?

Mr TAYLOR: We have a similar type of situation for our developments in New South Wales to what we have down here, whether we are dealing with a council, the department of planning, the EPA or, as you say, WorkSafe. We have to deal with fire—MFB, and New South Wales fire and rescue is another key agency that we have to engage with. I think it is part of that development process where you have to engage with a very broad range of stakeholders to ensure that you have covered off everything in that development. Is there an opportunity to streamline that process? I think there are always opportunities to streamline regulatory processes and not have a major development getting bogged down on one minor detail that those particular agencies are hell-bent on getting as part of the condition of consent. But from what we have seen down here in Victoria in terms of working with the EPA, with councils, with the MFB, it is actually probably slightly easier than it is in New South Wales.

Mr HILL: Just one thing I would say. I think the benefit again—we have talked about the levy a couple of times, but the main thing is to provide that extra resource capacity to the EPA, because as much as we are

impressed and we are aligned on the journey, it is the enforcement that is not giving that level playing field. And that, I think, will make the big difference—not just the market signals to the likes of us as a private industry participant, but it is giving the strength to enforce this new Act to the EPA. That is what they are probably most lacking now—resources on the ground to ensure compliance.

The CHAIR: On that note, thank you very much and again thank you for your contribution.

Witnesses withdrew.