SSROC submission on the
Too Good to Waste –
Discussion Paper on a Circular Economy for NSW

For the attention of

NSW Environment Protection Authority
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By email to: circular@epa.nsw.gov.au
Introduction

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of eleven councils. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member councils cover a population of over 1.7 million, or one third of the population of Sydney. Our residents produce around 20% of all NSW household waste.

SSROC provides a forum through which our member councils can interact, exchange ideas and work collaboratively to solve regional issues and contribute to the future sustainability of the region.

We advocate on behalf of our region to ensure that the major issues are addressed by all levels of government. Our current focus includes the environment, transport, procurement, waste, and planning.

SSROC strongly supports the development of a Circular Economy Policy, and we look forward to discussing a robust Implementation Plan for NSW that is adequately funded and resourced to create the transformational changes required to transition to a circular economy. This submission includes responses to the consultation questions posed in the Too Good to Waste – Discussion paper on a circular economy for NSW; as well as general comments from our Councils. Please also see attached our submission on the Federal Waste Policy as the same comments apply for NSW.

To prepare this submission by the deadline, it has not been possible for it to be approved by councils or to be endorsed by the ROC: we will contact you should any issues arise as a result. Despite that constraint, SSROC has prepared the submission with cross-Council input and internal review.

Consultation Questions:

1. What would you like to see in a Circular Economy Policy?

a) A commitment to funding the implementation of the Policy and an overview of the investment sources needed to support a transition towards a circular economy.

There is a significant risk of strong criticism and disengagement in the Policy from key stakeholders if the Policy does not identify legal, economic and political commitments from all levels of Government, and an assurance of funding sources, allowing for an economic and cultural transition over a period of time.

Some of the case studies referred to in the Discussion Paper such as UK Innovate required an investment of $3.28 billion AUD. SSROC recommends that a portion of financing should come from the NSW waste levy and that new funding sources are also identified and committed to in the finalised Policy.

b) A Circular Economy Policy needs firstly to be Federal with State policies supporting it.

SSROC provided a submission to the Federal Government’s Updating the 2009 National Waste Policy discussion paper Less Waste, More Resources. The paper drove some discussion about the need for a circular approach, and SSROC strongly supports the
concept that Federal leadership to circular economy will open the door for State and Local Governments to deliver their own strategies, policies and regulatory frameworks. Global examples of successful transitions toward circular economy all had in common a broad, public commitment from their Federal governments. They have been successful in part because of the leverage Federal government can establish through tariffs and trade, tax code changes, procurement of major projects, and contributions towards gross domestic production. State and local government can provide the strategic and operational delivery to suit their respective contexts.

Nonetheless, a NSW policy should clearly outline how it works within the National Waste Policy to achieve a circular economy. Similarly, a National policy should explain how it will work with states to achieve their goals.

Furthermore, it is unhelpful to drive a political, cultural and economic transition through the waste industry. The waste industry is one part of the puzzle, and the NSW EPA should be commended for publishing a draft circular economy policy. However, to be successful the objectives and targets of the Policy should be established and achieved across all relevant Government departments.

In recognition of an inter-Government approach, circular economy targets should be set that multiple departments can unite behind and achieve. A recent example is the NSW Premier’s Goal to reduce litter by 40%. This ambitious target is due to be met, through a committed multi-stakeholder approach, a well-resourced litter prevention grants program, and a commitment toward localised action planning. When the NSW Premier nominates a target, more action can and will be taken.

c) Fund an independent body to coordinate the transition to a circular economy.

The level of whole-of-government investment, resourcing, and multi-year commitments required to enable this transition are so extensive that SSROC recommends an independent body to oversee transition, work across sectors, lead research directives, establish data collection and reporting schemes, and build mainstream education and conversations.

A very good example of this in Europe is the Waste & Resources Action Programme (WRAP) UK, a fully-financed, independent and well-respected policy ambassador. WRAP is a registered charity, funded by government departments and public sector organisations to work with industry, governments and communities to achieve a circular economy. It designs and manages a number of grant programs on behalf of its funding bodies. WRAP also provides a number of services including research, program monitoring and evaluation, and has brokered a number of voluntary agreements with businesses in the construction, retail and manufacturing sectors. It is a chief advocate for its stakeholders on issues of importance. It also runs a number of consumer education and marketing campaigns.

An independent body could also establish minimum standards for reusable items and establish management systems, reporting and traceability for the reuse sector. There is also potential for an independent body to do national marketing for the reuse sector on common items that can be reused. An example of this is the UK Furniture Reuse Network (FRN), see [http://frn.reusehub.org](http://frn.reusehub.org). FRN works with 200 reuse charities providing furniture to low income households and reducing waste to landfill. It does national marketing on acceptable standards for the reuse of sofas, chairs, mattresses and beds. They have also developed a common monitoring framework enabling the payment of collection and reuse credits to all reuse organisations. FRN have also successfully run nationwide campaigns with retailers like IKEA.
d) Regulation and enforcement needs to be a focus area in the Policy.

Significant changes to the commercial, industrial and consumer economies will require a correlative regulatory framework that has foresight, and can sustain the speed and volume of transition. SSROC recommends that a multi-stakeholder taskforce be introduced to periodically meet to drive a prudent and measurable policy approach.

Furthermore, this role should not be the sole responsibility of the NSW EPA. The Policy should distinguish the NSW EPA as a driving force in regulation and enforcement, and establish assurance to markets and governments that the body responsible for the circular economy policy is synchronised with – and an advocate for – dependable and consistent compliance.

e) Circular economy goals need to be supported by economic tools and drivers.

The Policy should be ambitious. This means deriving circular economy goals and initiatives that are supported by regulatory, trade, design, tax code and mainstream communication measures. Any serious circular economy policy should have a disruptive influence on the economy. Economic instruments provide the push-pull to support existing and emerging businesses, social enterprises, networks and exchanges, and local governments to meet the Policy’s objectives. More detail on economic instruments is provided on page 4.

f) Include a greater focus on ‘industrial ecology’

The Policy should also include a greater focus on ‘industrial ecology’ actions and targets that address the potential for materials and energy flows to circulate between businesses. The EPA’s Circulate program should be mentioned as an example of a Program that aims to connect businesses that need materials with businesses that currently generate those materials as waste.

g) Acknowledge and plan for a greater focus on mainstream education and behaviour change.

A full-scale cultural shift is required to transition to a circular economy, and there is too little acknowledgment in the discussion paper devoted to mainstream education and behaviour change programming. The Policy should outline an extensive education and communications strategy, with the proportional investment required. Local governments can be effective conduits for exchange of information, but SSROC strongly recommends including a well-resourced State education investment strategy that complements rather than supplants councils’ existing communication and education programs.

Furthermore, we recommend that ‘educate the community about the circular economy’ is added as an additional circular economy principle in the Policy and that education to support behaviour change is its own dedicated focus area.

h) Data collection and analysis is required to inform Policy activities, targets and measures in the Policy, and should be a high priority.

The Policy requires a data-driven approach, but currently too little data is provided on how end-to-end product chains co-exist currently, and how they could be re-imagined. Baseline data is also required on the positive environmental and social impacts of the reuse and repair sector, as well as the volume and value of materials put through the re-use economy
in NSW. Data collection and analysis measures that are robust and agreed are required across all focus areas in the Policy. This is discussed in more detail under question 4.

i) Outline the planned stakeholder engagement framework for the delivery of the Policy.

One SSROC council cited the lack of stakeholder consultation and appropriate action planning after the Mixed Waste Organic Output exemption revocation in October 2018, which has significant resource recovery implications, as an example of a current incident that undermined local government trust in the regulatory agency’s capacity to implement a circular economy policy. Local government’s challenging experiences this year also include commercial contractual negotiations regarding Container Deposit Scheme refund sharing, and China’s National Sword policy fallout which could have been handled with more transparency, collaboration and engagement before impacts began to take effect. New policy approaches always require a trustworthy and transparent stakeholder consultation at all levels, particularly a policy with such far-reaching implications.

j) Include a table of stakeholders and their roles/responsibilities in the Policy and establish working groups to develop the Policy.

The Policy needs to include a high-level stakeholder analysis that represents all the different sectors that need to be involved in transitioning to a circular economy. This includes manufacturing and design, logistics and transport, domestic and overseas supply chains, academic and other research institutions, social services, waste services and the retail sector.

Once these key stakeholders have been identified they should be invited to develop and plan for a Policy in a collaborative way, representing a number of different sectors across all waste streams. This could be through Stakeholder Forums or working groups (similar to the China Sword Intergovernmental Taskforce Working Groups). The Groups should have an achievable and realistic framework to build industry action plans. This level of stakeholder engagement will help establish trust and increase stakeholder investment in the Policy.

k) Include short summaries of opportunities and their rationale for each sector.

Given this Policy relies on the engagement and collaboration between so many different sectors, this Policy could benefit from establishing sector-facing strategies e.g. local government, the manufacturing and design sector; the retail market sector, construction and urban development sector, etc. In this circumstance, stakeholder representatives can be entrusted to co-design these strategies.

l) Include dates or at least timeframes in the Circular Economy Policy Timeline.

m) Map the focus areas for NSW to the Circular Economy Principles

How the focus areas relates or links to the different Circular Economy Principles listed on pg16, could be better represented in the Discussion Paper either pictorially through diagrams and/or tables. It should also be identified how they link to the Federal Waste Policy.
2. How could the Government support a transition towards a circular economy?

a) By providing investment with new (not existing) funding.

As mentioned, the investment and funding necessary during transition needs to be in the billions and should not scavenge from existing grant schemes, such as Waste Less, Recycle More. Potential sources of funding, agency and academic integrations, and Parliamentary commitments (if possible) should be identified in the Policy. **SSROC recommends that significantly more of the waste levy should be used to bolster the Policy and Implementation Plan.** This would also encourage overseas investors.

b) Through regulation and tax incentives

The Policy needs to outline stronger market drivers and regulations that force businesses and other large-scale consumers to design, produce and source reusable, longer lasting products with higher percentages of recyclable content. Regulations are also needed for manufacturers to provide affordable and convenient repair services for consumers. International examples of regulatory measures to support a transition to a circular economy can be found at [govsgocircular.com](http://govsgocircular.com). The discussion paper references Japan, Europe and China and states that “all have a strong focus on regulation at a regional or national level”.

The following measures and recommendations from the European Union aim to encourage environmental improvement and resource efficiency, while also providing job creation and retention:

- 0% value-add tax (VAT) rates applied on the cost of labour for repair, maintenance, refurbishment and upgrade services on products such as furniture, electrical equipment, construction materials, bicycles, garments and other textiles.
- Tax rebates could be offered to citizens who have their goods repaired (for example, rebates on the costs of repairs are offered to individuals in the city of Gaza (Austria) and Sweden (for over 65-year old’s).
- 0% VAT rates on the sale of second-hand goods, since VAT was already paid once during the purchase of a new product.
- Allow retailers to recoup VAT through donation of products requiring refurbishment to social enterprise and re-use operators.
- 0% VAT rate for waste collection services provided by social enterprises that carry out activities in a manner that preserves whole-item reuse potential.
- 0% VAT rate for sales of recycled materials, in order to promote a market for quality recycled materials.
- Other tax deductions to encourage donations of used goods to social enterprise re-use operators.
- Tax relief (e.g. GST) for individual purchase of certified (tagged) recycled or refurbished goods.
- Increased cost on consumer goods with packaging that is made from non-recycled plastic (e.g. France from 2019 will increase the cost of products sold in unrecyclable plastic packaging by 10%).
- Enabling unique infrastructure opportunities for re-sale of recycled and repurposed items, to inspire or accommodate more ‘takers, buyers’ of second-hand goods. (e.g. [Retuna Recycling Mall in Sweden](http://Retuna Recycling Mall in Sweden)).

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• Supporting job growth by ‘waste to wages’ targets (e.g. Belgium identifying job growth as a key indicator for a thriving waste industry, with real actions towards social inclusion).

c) Investing in the professionalisation and expansion of the Reuse sector

A circular economy approach runs the risk over time of over-incentivising re-processing or ‘advanced manufacturing’ objectives. However, to meet the growing supply of reusable items, and to increase demand for ‘reuse takers’ the government should emphasise capacity-building activities for the reuse sector and address some of the barriers to consumers and businesses about buying second hand items. Areas for consideration include:

• Standardise, incentivise and continuously improve data capture and reporting systems for the reuse sector that reflect the true benefits of reuse beyond diversion. Most reuse enterprises are responsible for their own data on materials and activities, but do not have a universal or agreed method.

• Identify facility and opportunity gaps in NSW that would benefit from reuse or repair centres or online marketplaces, and provide funding opportunities. Consumers need easy access to affordable repair centres, and attractive places to donate and purchase used goods. Social research by SSROC into attitudes towards unwanted items showed that more than half of residents surveyed were unwilling to travel more than 5km from their home or office to drop off unwanted goods.

• Expand consumer protection schemes to include pre-used or repaired goods in order to build public trust, such as minimum standards for reuse centres, certification schemes, repair ratings or customer warranties. In time, this could be expanded to include ‘fair repair’ legislation for specific consumer streams, such as smartphones and electrical devices.

• Assist social enterprises and not for profit organisations to professionalise their reuse services and shopfronts. For example, a key success factor in the Flemish nation-wide waste management policy was the professionalisation of the re-use sector, partly through the recognition of its role in social inclusion, poverty alleviation and employment. The waste regulator, OVAM, assisted the establishment of a well-resourced network umbrella (KOMOSIE). It provided funding for reuse centres to redesign their shops to a minimum standard; common branding and publicity; and quality control of goods and employment training. The growth of the Belgian reuse sector under the KOMOSIE network grew from 20 shops in 1995 to 124 shops in 2014. The network’s success is reflected in number of paying customers (from 140,000 in 1995 to over 5 million in 2014) and an increase in jobs from 200 to 5,145 (including 3,913 FTEs) in the same period.

d) Consult with local government before including any suggested changes to local government waste management systems in the Policy

The discussion paper mentions a number of measures that would require major changes in local government waste management systems and would have significant cost and service delivery implications. Some of our Councils are concerned that the draft Policy includes suggestions for different bins and collection schemes without appropriate consultation with local government, without a cost recovery scheme, and without the analysis and planning

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3 How to start a Re-use Shop? An overview of more than two decades of re-use in Flanders. OVAM www.ovam.be 2015
required to outline how these changes would be implemented. These are found in the discussion paper on:

- Page 27: “Recovering high quality plastics, glass, paper and metals requires different bins and collection schemes for each waste and recycling scheme”.
- Page 28: “mandatory separate bins for food and garden organics for all households across NSW”. This issue is discussed more under questions 11 and 12.

Before including these options in the finalised Policy and creating an expectation in the community that these changes will be funded, the NSW EPA should consult with local government extensively through a stakeholder forum or through working groups to adequately canvass different viewpoints on the viability and appropriateness of suggested measures. Provision of successful case studies may be counter-productive unless learnings from unsuccessful programs are well understood.

3. **What are the main barriers to the implementation of a circular economy? (pick up to three)**

1. Government policy and legislation
2. Funding for research and development

4. **How could a new or improved research support platform support circular economy?**

Before funding a new or improved research support platform, a higher priority should be making sure that NSW has addressed gaps in research or data required to inform Policy recommendations, targets and measures. A comprehensive gap analysis for the research and data that is needed will help to prioritise which areas require more investment.

Currently there is not a consistent approach or guideline for data collection in the reuse sector, which limits how organisations can apply for funding, or accurately and transparently articulate the value of their services. Therefore, standards and guidelines for how sector-wide reuse happens could set a market expectation for the impact of reuse activities. A high priority should also be ensuring there is adequate funding for existing research entities, universities, social enterprises and non-governmental organisations (NGOs) already working to support a circular economy.

Areas requiring more research include:

- Baseline of current research and data available on reuse, repair and technologies available to recover materials.
- Adoption of consistent measures to report on material, social and financial impacts.
- Development of standard item-type classification for back-of-house and Point of Sale systems, in order to link materials to sales value.
- Harmonisation and integration of these systems across the re-use sector, for specific streams, which includes manual and automatic methods.
- Analysis of how organisations overseas have established standard guidelines for measuring when reuse occurs and its impact.
- Economic instruments used in other countries to incentivise a transition to a circular economy.
- High level cost benefit analysis of transitioning to a circular waste recovery system for local government (including the processing, purchasing and maintenance costs associated with using recovered and reusable materials).
• Addressing gaps in data on dry and organic recycling, including research or data that will inform Policy recommendations.
• Domestic and overseas supply chain analysis.
• Reliable data on construction and demolition waste, and a stakeholder analysis.
• Social research identifying the barriers and drivers to behaviour change.
• Communication strategies for target audiences to support the transition to a circular economy.

5. What services and support would you like to see a circular economy innovation hub provide?

An innovation hub – funded for 5-7 years would send a clear message that State and Federal Governments take the move to a circular economy seriously.

The NSW Government has an important role in helping to unlock researchers and innovators’ expertise and experiences with manufacturers to improve confidence and capacity. An innovation hub could provide:

• More seed funding to support research in its early stages - The problem with existing national and state funding streams for research is that there isn’t much seed funding available for projects in the very early research phases. Small companies often are not resourced enough to conduct research and development.
• More funding to scale proven innovations from the research and development phase, to the market. This could be through streamlining protocols regarding compliance, patents and licensing, establishing large demonstration sites, and market testing.
• Establish a NSW-wide version of the Victorian ASPIRE digital platform that matches material resources, or waste, between businesses, manufacturers, re-manufacturers and recyclers to identify alternative supply chains; see https://aspire.csiro.au for more information. Alternatively, leverage the EPA’s Circulate program to promote and activate industrial ecology activities.
• Deliver improved forward and reverse logistics setups, and supportive case studies.
• New business models using online sharing and ‘gig economy’ platforms. This is the time to use trends in disruptive innovation to bring more agency to different stakeholders. One SSROC council referred to new drop-off, sharing, sensor technologies, or network-driven platforms as the ‘Uber-isation of waste.’
• Address some of the data challenges listed at Q4 – ensuring that all the work takes place in close collaboration with Federal and other State Governments.

6. What purchasing decisions do you make where circular economy principles can be applied?

SSROC aims to embed circular economy principles such as waste avoidance and resource recovery in its contracts and procurement processes on behalf of its member councils. In 2016, SSROC held a Circular Works Forum – Securing a Resource Recovered Supply Chain for Sydney’s Roads. The aim of the Forum was to facilitate discussion between key State Government, civil works industry, recyclers, and Local Government engineers and procurement managers about barriers and opportunities for using recovered glass and plastic in roadbases.
The primary takeaways from the Forum was that the cost of using these materials is not prohibitive, and that to increase the use of recovered materials in road bases there needs to be:

- Intensive product testing, a regulatory framework, and relevant specifications that allow for recycled content in road supply and pavement works.
- A shift to performance-based contracts (not output-based) to ‘go circular.’
- Increased awareness especially amongst council engineers and asset managers of alternative specifications and existing, local and NSW case studies.

A generalised circular economy approach toward waste management should incentivise collection and processing companies to price their services and goods in relation to the fate of the waste generated, aligned with the waste hierarchy. Local governments should be incentivised proportionally by the type of diversion – through the waste levy. For example, lowest value (higher price) for landfill, and highest value (lowest price) for re-use/redistribution. This would eventuate differently for different streams, but adoption of a performance-based approach would encourage market innovations and new types of waste service provision.

Other opportunities for councils and regional organisations of councils to apply circular economy principles in their purchasing decisions is to align weightings for government procurement to triple-bottom line considerations. Sustainable and social procurement, and life cycle costing, should be enacted and incentivised at all levels of government. This would have a dual impact, by encouraging buyers to adjust their mindset towards local, well-made products that use recycled content, and encourage bidders to innovate towards workable technologies and products. Training could be provided to government procurement professionals in sustainable and social procurement competencies.

7. How do you think the NSW Government could increase the use of re-usable and recyclable material through its purchasing decisions?

Lead by example through:

- Weighting the evaluation criteria to achieve the desired circular economy objectives.
- Providing model procurement templates that include circular economy principles.
- Organising targeted training in sustainable and social procurement.
- Creating best practice demonstration sites, example specifications and the sharing of case studies. For example, there is a limited supply chain for clean washed glass partly because of demand issues. NSW Roads and Maritime Services manages 18,000km of road across NSW, providing both the demand and the capacity for multiple demonstration sites for using recycled glass in road bases, and a useful public relations opportunity. Sutherland Shire Councils proudly launched its Reconophalt road in 2018, made of crushed asphalt, recycled glass, plastic bags and ink toner.
- Regulated minimum purchasing practices of – or a Government commitment to – recycled content, including in civil engineering projects.
- Mandatory use of AS/ISO 20400 Sustainable Procurement, and AS/ISO 20600 Social Responsibility, and explanation to the community both during and after tendering processes about how they were applied.
- State level education to promote positive consumer choices.
• Work with industry to establish warranties for products that are refurbished or repaired. Also, clear identification on new products as to the expected life span of use to incentivise the purchase of longer lasting products.

8. What can the NSW Government do to better support the recycling industry?

• Re-investing NSW waste levy revenue back into the industry to fund a transition to circular economy.
• Finance and up-skill the secondary processing sector in order to ‘clean the recycling streams’.
• Invest in infrastructure and technology to separate products and items to component material types, distribution/triage centres, repair and refurbishment facilities and services.
• Provide minimum standards and codes of practice for Material Recovery Facilities (MRFs). Develop a standard list of recyclable items that all MRFs have to accept for processing; (for example tetra packs is not accepted by all MRFs).
• Improved regulation, data transparency and other guidance from the NSW Government on the Container Deposit Scheme to build trust and transparency between generators, processors and community.
• Provide more certainty to stakeholders investing in recycling projects by providing open, transparent processes and consultation. The handling of China Sword and the AWT outputs exemption are key examples of the ramifications if stakeholders aren’t consulted early enough and without detailed forward planning.
• Provide support and guidance to stakeholders to facilitate, develop and continue recycling projects beyond the regulatory actions. The AWT outputs exemption revocation management is an example of how NSW EPA exercised their regulatory strength without first providing stakeholders with the knowledge and tools they required to solve the identified issues. Several weeks on, EPA has still not released all the research resulting in the revocation decision or provided stakeholders using AWT organics on mine sites with the information they need to improve their programs.
• Mandate/incentivise what type of packaging can and can’t be used.
• Require minimum reporting standards from waste contractors on materials recycled.
• Invest in knowledge sharing opportunities for local councils and private sector to share their experience in transitioning towards circular economy practices.
• Analyse difficult waste streams where gaps exist in design and recycling stages.

9. Do you have comments on the Support Reuse and Repair focus area?

This focus area should include some policy objectives to fund large scale re-use and repair facilities that are accessible, convenient and affordable. Currently, only some metropolitan areas have easy access to a few repair services for different goods, however it needs to be balanced with a lack of space in inner-city areas.

• A focus on co-locating reuse/repair centres at metro-area waste facilities or other well-known community or commercial drop-off centres.
• Bring existing industry, community and charity networks that are already providing services to enable the expansion and professionalisation of these services and outlets to include reuse and repair.
• Existing networks – some of whom are already active in reuse, repair and refurbishment – include Zero Waste Network, National Association of Charitable
Recycling Organisations, Men’s Sheds, Country Women’s Association, Scouts and Girl Guides, migrant resource centres.

- Require that a portion of new developments be zoned for reuse, repair or pooled resource sharing facilities in accordance with density.
- Provide incentives for building level sharing schemes in high density areas, e.g. laundry facilities in residential flat buildings.
- Fund and organise a state-wide behaviour change program on Reuse/Repair.

10. Would you support zero food and garden waste to landfill?

Councils in the SSROC region have some serious concerns about a food waste to landfill ban. Currently, there is not adequate infrastructure (transfer stations and processing facilities), funding, regulatory support or trust to facilitate a food waste to landfill ban. One of our Councils has identified that the lack of transfer stations for food waste in Sydney metro is their greatest barrier in rolling out food and garden organics (FOGO) services. Another council is deeply concerned that a food waste to landfill ban would have a detrimental impact on the waste and recycling industry, and local government.

As part of its commitment to transparency and consultation with local governments, before any new policy on food waste is developed the NSW EPA should provide all councils more information such as:

- How such a ban would be implemented, timed (e.g. over 3-5 years) and funded.
- The capacity and gaps of existing food waste processing facilities, and the market demand for the end product.
- Current best practices, as well as unsuccessful FOGO collections programs.
- Consideration of other technology solutions for FOGO such as on-site processing.
- How accountability and compliance would be identified and enforced.
- How cost recovery for Local Government would occur and assist with transition.
- An investigation of the potential contaminants and environmental risks of FOGO material, similarly to the investigations that led to the revocation of the MWOO outputs exemption and order.
- Analysis of how a ban on supermarket food waste to landfill similar to legislation introduced in France and Italy would work in Australia. This analysis could also consider a ban of food waste to landfill from large fast food outlets such as McDonald’s and KFC).

Reducing food waste in line with existing WARR hierarchy should be the highest priority, in order to reduce the requirement for additional organics recycling facilities and burden on recycling infrastructure.

11. What measures do you think would help organics become more circular and reduce food waste to landfill in NSW?

Food waste reporting needs improvement nationally especially in the commercial and industrial sector, where food waste reporting should be compulsory for supermarkets. There is also little publicly available data in Australia about food waste during earlier stages of the food supply chain (pre-farm gate, food processing and retail) or food waste in restaurants and cafes. The Department of Environment and Energy’s National Food Waste Assessment Final Report has already identified how variable the national data is on food waste and how this makes it “difficult to improve the environmental performance of our waste management systems”.

12
A high priority is getting adequate data on food waste and analysis of the barriers and potential solutions for recovering more organic material from landfill; this valuable information can then be used to inform Policy targets.

12. How do you think product stewardship schemes can be expanded, and what products should be included in a product stewardship scheme?

We need to move away from schemes that are mostly voluntary, to schemes that are mandatory with stronger incentives and regulatory consistency. Following the WARR hierarchy, products that are made from materials with poor recycling prospects should be phased out of production as a priority. Product Stewardship schemes should be expanded to include:

- **Electrical accessories and other electrical items**: SSROC councils have asked that every electronic item (any item with a plug) be included in the National Television and Computer Recycling Scheme (NTCRS). Collecting out of scope items from residents has had significant cost implications, and it is difficult and resource-intensive to refuse items from residents who go to the effort of collecting, storing and transporting electronic items for recycling.

- **Mattresses** – This scheme is being developed as outlined by Soft Landings at: [https://www.softlanding.com.au/our-partners/](https://www.softlanding.com.au/our-partners/) Voluntary schemes are arguably the most difficult to achieve, therefore more acknowledgment and communication of these is required.

- **Fridges, freezers and air conditioners** - these items can’t be compacted, are costly to de-gas, and take up large amounts of room in landfill. Responsible disposal of fridges is becoming a bigger priority with the loss of the Fridge Buyback Scheme.

- **Polystyrene** – A major pollution source in the marine environment and very difficult to recycle. It could be included in a meaningful ‘Packaging’ scheme, which is sponsored by the Australian Packaging Covenant.

- **Textiles** (clothing, carpets, soft furnishings and manchester) – SSROC regional bin audits from 2015 show a significant increase in the amount textiles including carpets in the general waste bin. Councils, as well as charities, end up paying the cost of dealing with this waste without contributions from the industries producing these materials.

- **Milk, bread crates and shopping trolleys** – often a public safety, illegal dumping and access problem that councils deal with in laneways, pedestrian pathways, or shopping and commercial precincts. A deposit system with rebates for returned milk and bread crates was suggested by one of our councils.

- **Takeaway coffee cups** – consider adding a levy on the cups to discourage use and provide incentives for cafes to encourage alternatives.

- **Disposable nappies** – In households with young children, disposable nappies make up a large proportion of the general waste bin. Incentives for manufacturers to use biodegradable and renewable materials could be considered.

- **Discarded cars** – Review the End-of-Life Vehicle (ELV) Directive to manage waste generated by discarded cars in the European Union, for application in Australia. “The Directive makes producers responsible for increasing the reuse, recovery and recycling rates of ELVs by setting clear quantified targets. At the same time, it urges producers to manufacture new vehicles without using hazardous substances and to adjust the vehicle design to one that is more circular”. See [http://ec.europa.eu/environment/waste/elv/index.htm](http://ec.europa.eu/environment/waste/elv/index.htm) for more information.
- **Batteries** – Not accepted in kerbside recycling and detrimental to the resource recovery of organics at the MBT if included in the red-lidded garbage bin.

- **Tyres** – Whilst a voluntary product stewardship exists, many Councils still pay for the recycling of tyres that are illegally dumped and there is currently no means to recover this cost. This scheme should be mandatory to ensure more manufacturers and retailers are involved in the scheme and funding should be made available to local government to cover the cost of collecting and recycling tyres.

- **Medical sharps** – Councils currently use EPA’s Better Waste and Recycling Fund (BWRF) money to subsidise this program. Should BWRF money be decreased, the continuation of this program will need to be reviewed. The sharps collection program is essential to ensure medical sharps are not disposed of in kerbside bins, which would have serious WHS issues during collection and processing.

- **Home and garden chemicals** – manufacturers of home and garden chemicals including herbicides and pesticides should contribute to the cost and organisation of recycling and/or disposing of these items responsibly. Currently, these items are collected for disposal/recycling through chemical clean out collections funded by state government and organised by local government. A scheme that makes it easier for consumers to take back unused chemicals to the retailers they purchased it from should be considered, similar to unused medicine being returned to pharmacies.

13. **Responsible packaging - What actions would you like to see the NSW Government take to better support these national targets?**

- Remove GST on recycled packaged products.
- Stronger import requirements and restrictions for products using single-use plastics in packaging, or that use packaging outside the scope of APCO targets.
- State-level consumer awareness-raising and education campaigns with increased financial allocation to these campaigns from the waste levy.
- Mandatory labelling for packaging recyclability (i.e. in accordance with direction of Australasian Recycling Label).
- Strict requirements around use of biodegradability claims.
- Restrictions on the use of materials that are not readily recyclable or recoverable in Australian MRFs.
**Conclusion**

SSROC commends the NSW Government for beginning this journey. The Policy needs to include stronger commitments and data driven analysis of the investment, regulation and education needed to support a transition towards a circular economy and the final Policy should be developed collaboratively with stakeholders.

SSROC, and Local Government in general, aim to work with all stakeholders to make it a success.

For any enquiries regarding this submission, please contact David Kuhn, Regional Strategic Coordinator Waste and Resource Recovery on david.kuhn@ssroc.nsw.gov.au or 02-8396-3800.

Yours sincerely

Namoi Dougall

*General Manager*

*Southern Sydney Regional Organisation of Councils*
5 October 2018

National Waste Strategy Taskforce
Department of the Environment and Energy
By email: nationalwastepolicy@environment.gov.au

Dear Sir or Madam

Re: Update of the 2009 National Waste Policy

About us

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of 11 councils spanning Sydney's southern suburbs, eastern suburbs, CBD, and inner west and covering a third of the Greater Sydney's population, or 1.7m people. Our Councils manage around 655,000 tonnes of household waste each year; which is about 20% of all NSW household waste.

SSROC provides a forum through which our member councils can interact, exchange ideas and work collaboratively to solve regional issues and contribute to the future sustainability of the region.

We advocate on behalf of our region to ensure that the major issues are addressed by all levels of government. Our current focus includes the environment, transport, procurement, waste, and planning.

Councils’ vision for the Regional Waste Avoidance and Resource Recovery Strategy is "to manage waste for the highest level of environmental and social benefit though cost-effective resource recovery, including reducing the environmental impact of waste and using resources more efficiently."

We are keenly interested in the direction that the Australian Government orientates the nation following China’s policy decisions regarding importation of waste materials, and how coordination of the delivery of the policy by all levels of Government, and across multiple industry sectors, will be managed by the Australian Government.

This submission

As a result of the time constraints for providing feedback on the discussion paper, SSROC has, in consultation with its member Councils, provided considerable input to the submission prepared by Local Government NSW. Representatives from Regional Organisations (metropolitan levy paying areas) and Voluntary Waste Groups across NSW all contributed to its development to provide a robust NSW-wide response.

SSROC supports both the LGNSW submission and their feedback on the proposed targets and principles.

However, whilst we have advised member Councils of the key strengths of, and the opportunities to refine content of the Australian government discussion paper, neither the LGNSW submission
nor this cover letter have been approved by councils or endorsed by the ROC due to the
deadline for the submission. We will contact you should any issues arise a result.

**Key Points of emphasis for SSROC**

Whilst we support the LGNSW submission in its entirety, as a metropolitan organisation, we would
like to bring the following key points to your attention:

1. **Circular Economy:** Whilst the move towards developing a circular economy for Australia is
worthy, and the discussion paper uses some language of a circular economy and proposes
a set of principles to underpin the Australian response; the principles need to be more fully
considered and explained in the updated policy and any subsequent delivery mechanisms.
For example see the following for discussion on common language:

https://www.circle-economy.com/the-7-key-elements-of-the-circular-economy

2. **Circular Economy:** SSROC would like to see Australia’s waste policy (and a national
circular economy policy) more closely reflect the Ellen MacArthur model, on which many
national policies have been developed. This will recognise the intent to build economic,
natural and social capital in Australia (noting that the Ellen MacArthur model has three
principles).

https://www.ellenmacarthurfoundation.org/circular-economy/concept

3. **Behaviour Change:** Since China put import restrictions in place there has been extensive
discussion in industry and government forums (both nationally and within NSW) implying
that local councils need to provide more education. However, significant financial cost and
extensive investment is required for councils to deliver the level of robust community-based
education that is needed to drive that deep behaviour change. These financial implications
are largely unacknowledged, and the discussion paper also falls short in this regard.
SSROC advises that a strong, funded national behaviour change campaign is incorporated
in the policy and delivery plans that arise from this discussion paper. The issue of who is
responsible for paying for and delivering education is likely to arise in future negotiations on
local government recycling processing contracts.

4. **Economic Instruments:** The use of economic instruments and levers (as well as
education) should be more strongly emphasised as a delivery mechanism to support
business and industry in making the systemic changes required to meet the policy
objectives and targets.

5. **Coordination body:** The policy and its delivery instruments should outline the
governance arrangements for transitioning to a circular economy, perhaps including an
independent body to oversee transition. These could be informed by progress overseas
(predominantly European models), and could recognise that whilst waste and resource
recovery is both essential and enabling, it is not the only sector that will need to change
to bring about the objectives in the discussion paper.

Thank you for this opportunity to contribute to the development of Australia’s strategic direction for
waste and resource management. For any enquiries, please contact Helen Sloan, Program
Manager SSROC on 02 8396 3800.

Yours sincerely

Namoi Dougall
General Manager
Southern Sydney Regional Organisation of Councils
Draft Submission on the Discussion Paper –
*Updating the 2009 National Waste Policy: Less waste, more resources*

October 2018
# Table of contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Opening</td>
<td>3</td>
</tr>
<tr>
<td>Purpose</td>
<td>3</td>
</tr>
<tr>
<td>Background</td>
<td>3</td>
</tr>
<tr>
<td>Response</td>
<td>3</td>
</tr>
<tr>
<td>Overarching comments</td>
<td>4</td>
</tr>
<tr>
<td>Conclusion</td>
<td>6</td>
</tr>
<tr>
<td>Feedback on targets</td>
<td>7</td>
</tr>
<tr>
<td>Feedback on strategies</td>
<td>9</td>
</tr>
</tbody>
</table>
Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing general purpose councils and related entities. LGNSW facilitates the development of an effective community based system of local government in the State.

LGNSW welcomes the opportunity to comment on the Discussion Paper Updating the 2009 National Waste Policy: Less waste, more resources.

This is a draft submission awaiting review by LGNSW’s Board. Any amendments will be forwarded in due course.

Purpose

The Australian Department of Environment and Energy is seeking input on priority issues to be considered in future Australian waste management and resource recovery. The Department is undertaking updates to the 2009 National Waste Policy: Less waste, more resources and has sought feedback by 5 October on the Discussion Paper that was released on 7 September 2018. The April meeting of environment ministers agreed to update the policy and incorporate circular economy principles. Feedback will inform updates to the 2009 National Waste Policy for consideration by environment ministers later this year.

Background

The Council of Australian Governments (COAG) Standing Committee on Environment and Water developed a comprehensive National Waste Policy in 2009 that provided a national framework for improving Australian waste management and resource recovery. There has been little progress or reporting on outcomes from the policy to date. This has left Australia’s recycling industry in a vulnerable position to manage the volatility in global markets triggered by China’s National Sword policy.

During the life of the 2009 National Waste Policy waste generation rates per capita have declined and recovery rates have improved, however our population and consumption choices continue to grow. Coupled with China’s decision to restrict imports of recycled materials and changing international markets there is a need to develop a resilient waste management and resource recovery sector and improve domestic markets for recyclates (secondary materials produced from recycling). These new challenges require an update to the 2009 National Waste Policy.

Australia is behind other countries, particularly in the European Union, which have established policies and made investments in infrastructure and technology to support circular economies to ensure secondary materials are used onshore, creating jobs and wealth.

The Discussion Paper signals a shift in policy position, transitioning away from a linear economy to a circular economy that retains the value of materials in the economy for as long as possible.

Response

LGNSW welcomes the opportunity to comment on the Discussion Paper – Updating the 2009 National Waste Policy: Less waste, more resources. LGNSW has long advocated for the recognition of the waste and resource recovery sector as a priority sector, essential service and significant contributor to the Australian economy.
Overarching comments

The tight time frame for updating the National Waste Policy for sign off at the meeting of environment ministers in November in 2018 is likely to lead to a policy that has not been fully developed or endorsed by all levels of government. The timeframe is insufficient to allow the release of the actual draft policy for comment and for endorsement by local government, which is likely to be responsible for implementing actions.

Updating the existing National Waste Policy, including circular economy thinking, is a positive step towards preserving our prosperity. However the proposed update is still primarily focussed at end of life and in part on consumption, without reflecting all facets of a circular economy. Consideration could be given to including in the Policy a pathway for the development of a circular economy policy for Australia.

The discussion paper outlines proposed principles, targets, strategies and milestones that at times contain actions without identifying responsible parties for ownership or implementation. The strategies and milestones are not always outcome focussed, often mixing actions and activities with outcomes and this weakens the clarity of the policy direction. There is also a lack of information on how the policy will be monitored, reviewed, reported, evaluated and updated.

It is noted that this will be a policy that incorporates circular economy thinking and is most appropriately signed off by ‘whole of government’ as it impacts on Australia’s triple bottom line and implementation will require action from a number of agencies at all levels of government.

If the National Waste Policy is to reflect circular economy thinking, recognition of the need to minimise the reliance on virgin material should be included as a first principle, rather than starting with avoiding waste.

Given that many recyclables (eg compost) have low commodity values that are undercut by transport and logistics costs, consideration should be given to including strategies that encourage the development of localised circular economies close to the source material.

The discussion paper does not list organisations that provided input. It is considered important that there is sufficient representation from the broader business community (for example Australian Business Group and Manufacturing Australia). The size of business that becomes a voluntary signatory to this policy and its action plans also needs consideration as there is opportunity to target, in the first instance, businesses over a certain size/turnover/type or that import goods.

Reflecting circular economy thinking needs to recognise the opportunity and economic incentives for jobs including from the social sector, as well as regional economic development and modernisation of the industry. Consideration could be given to the use of economic instruments including using: global trade and compliance mechanisms for imports, relief from GST for products that remain in the economy eg through repair and reuse, and compliance with Australian Standards to leverage producers to create better-quality goods, and to reduce product lines that are single-use or made from virgin material.

Examples of economic instruments for consideration include:

- tax relief (eg GST) for community purchase of certified recycled or refurbished goods.
• increased cost of consumer goods with packaging made from non-recycled plastic (eg France from 2019 will increase the cost of products sold in unrecyclable plastic packaging by 10%)
• enabling unique infrastructure opportunities for re-sale of recycled / repurposed items, to inspire or accommodate more ‘takers, buyers’ of second-hand goods. (eg ReTuna Recycling Mall in Sweden)
• supporting job growth by ‘waste to wages’ targets (eg Belgium identifying job growth as a key indicator for a thriving waste industry, with real actions towards social inclusion).

The discussion paper should consider outlining how this policy enables/overlaps/interacts with existing national policies, strategies and programs, such as the National Food Waste Strategy (targets are included but not identified), National Infrastructure Strategy and the Clean Energy Finance Corporation to stimulate the market to invest in low carbon initiatives.

Whilst the discussion paper recognises that transitioning to the circular economy involves strengthening product stewardship and sustainable procurement as well as investments in infrastructure, it does not adequately recognise the regulatory and policy changes needed to influence and change behaviour that should underpin the identified principles, targets and milestones. A strong national education and awareness raising theme should underpin all principles and targets, with consideration given to campaigns that increase the public’s knowledge of and support for the circular economy.

Consideration should also be given to the development of a national knowledge/innovation hub (similar to Holland Circular Hotspot) for the circular economy including development of local circular economy case studies and international best practice as well as useful tools for organisations that outlines steps that can be taken on their journey towards the circular economy. This could also include case studies on smart technologies (eg bin sensors that allow ‘bin sharing’ for Commercial and Industrial (C&I) and Municipal Solid Waste (MSW), Food and Garden Organics (FOGO) vacuum systems and solar and geo-targeting applications)

Figure 3: Circular Economy could be better represented by the circular economy graphic from the Ellen McArthur Foundation. The discussion on the circular economy could better reflect the dual circular flows as represented by the Ellen McArthur Foundation.

There is a need to define words used (eg resource recovery or terms used in targets such as “problematic” and “unnecessary”). It is likely that different state legislation include differing definitions (eg recycling may or may not be included in the definition of waste).

The discussion, strategies and milestones of Principle 2: Improve resource recovery should consider improving the ‘quality’ of both the inputs to processing (eg reducing contamination of kerbside recycling) and the outputs of processing (eg recyclate). Higher quality will enable a wider range of markets/uses for recyclate and enable remanufacture of better quality products. It is also important to break down resource recovery into its component parts when setting targets so that recycling can be prioritised over recovery of energy from waste in line with the waste hierarchy.

Consideration should be given to strengthening strategies and milestones for high quality reuse and repair to extend product life.

The Policy should consider strengthening and mandating extended producer responsibility for products with high environmental impact. As the recommendations from the recent review of the Product Stewardship Act have not been released it is not possible to comment on which of these should be included in this updated policy.
The Policy should also recognise the waste and resource recovery sector as an enabling sector necessary for the efficient and effective operation of many other sectors of the economy (similar to the energy sector) and that the value of this sector is likely to increase rapidly in the transition to the circular economy until it becomes predominately integrated into all sector supply and demand chains in a circular economy.

Feedback to questions posed in the Discussion Paper and specific edits to the principles, strategies and actions have been collated in the attached table. Revisions are underlined and in strikethrough text, new text is in green.

**Conclusion**

LGNSW welcomes the Australian Government’s leadership in updating the National Waste Policy, including circular economy thinking, and we look forward to the opportunity to input to the draft National Waste Strategy when it is released.

Any financial flow-on effects to NSW local government in implementing this Policy should be funded by hypothecation of the NSW Waste Levy to councils for the purpose for which it was collected - encouraging waste avoidance, recycling and the safe environmental disposal of waste.

For further information, please contact Liz Quinlan, Senior Policy Officer – Waste, on Liz.Quinlan@lgsw.org.au or 02 9242 4095.
## Feedback on targets

<table>
<thead>
<tr>
<th>Principles</th>
<th>Target</th>
<th>Do you agree? Ranking:</th>
<th>Is there a different Target that should be included</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>NEW - Minimise reliance on virgin materials</td>
<td>By 2030 achieve the sustainable management and efficient use of natural resources (part of UN SDG Goal 12); OR</td>
<td>1</td>
<td>See new target</td>
<td>A principle and target that reflects reducing dependence on virgin material/natural resources, particularly for resources with high environmental pressure or limited supply, is needed to reflect circular economy thinking. Alternatively, a pathway to achieve this is needed.</td>
</tr>
<tr>
<td>(should be first principal)</td>
<td>By 2030 achieve sustainable materials management reducing pressure on natural resources</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P1: Avoid Waste</td>
<td>Reduce total waste generated in Australia per capita by 10% by 2030</td>
<td>1</td>
<td></td>
<td>How waste generation target is measured for avoidance rather than other conditions (eg light weighting, economic conditions) needs consideration.</td>
</tr>
<tr>
<td>(define)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P2: Improve Resource Recovery</td>
<td>80% average recovery rate from all resource-recovery streams, following the waste hierarchy by 2030</td>
<td>2</td>
<td></td>
<td>This target needs to be closely tied to P3 as need strong markets for system to work</td>
</tr>
<tr>
<td>(define)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>P3: Increase use of recycled material and build demand and markets for recycled products</td>
<td>30% average recycled content across all goods and infrastructure procurement by 2030</td>
<td>2</td>
<td>Should Australian vs imported recycled content be specified?</td>
<td>Most common recycled products (eg recycled paper) have imported recycled content and do not support markets for local resource recovery.</td>
</tr>
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<td>---</td>
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</tr>
<tr>
<td>P4: Better manage material flows to benefit human health, the environment and economy</td>
<td>a) Phase out problematic and unnecessary plastics by 2030</td>
<td>3</td>
<td>Phase out hard to recycle products by 2030</td>
<td>Problematic needs to be defined and ‘unnecessary’ is unnecessary! Should be broadened to all hard to recycle or ‘problematic’ materials (with definitions). If it is to be applied just to plastics, then target should be by 2025</td>
</tr>
<tr>
<td></td>
<td>b) Halve the volume of organic waste sent to landfill by 2030</td>
<td>3</td>
<td>80% reduction in the volume of organic waste sent to landfill by 2030</td>
<td>Considerable progress has been made already in NSW so a harder target is required to drive the development of alternatives to eg pallets and treated timbers</td>
</tr>
<tr>
<td>P5: Improve information to support innovation, guide investment and enable informed consumer decisions</td>
<td>A national target for fit-for-purpose and timely data to be available for individuals, businesses and governments to make informed decisions</td>
<td>5</td>
<td>A fit for purpose national data framework is endorsed by 2019 and in use to make informed decisions by 2020 with the goal of real time data.</td>
<td>Apart from the biennial National Waste Report there is little knowledge at local government level regarding national WARR data frameworks</td>
</tr>
<tr>
<td>NEW – People have the relevant information, awareness and skills to make sustainable choices</td>
<td>NEW – Consumer education strategies in place across Australia about sustainable consumption choices, waste avoidance and reduction, improved recycling and resource recovery by 2021.</td>
<td></td>
<td></td>
<td>See new target</td>
</tr>
</tbody>
</table>
### Feedback on strategies

#### Principle 1: Avoid Waste

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Do you agree? Ranking: 1 yes, 5 no</th>
<th>If not, why not?</th>
<th>Interim Milestones (revisions in red, new milestones in green)</th>
<th>Do you agree? Ranking: 1 yes, 5 no</th>
<th>If not, why not?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategy 1: Waste avoidance</strong> - Deliver actions that help the community and businesses avoid and minimise waste, including through design, reuse, repair, and sharing of products and services</td>
<td>3</td>
<td>Revised wording: Deliver actions that help governments, community and businesses avoid and minimise waste, including through consumption choices, design, reuse, repair, and sharing of products and services.</td>
<td>Businesses across the food supply and consumption chain become signatories to the voluntary commitment program to reduce food waste by 2019</td>
<td>1</td>
<td>Funding for oversight body for voluntary commitment program already committed by government. Public reporting of progress against commitment is required.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total waste generated in Australia is reduced by 5 per cent per capita by 2025</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Food waste is halved by 2030, in line with the National Food Waste Strategy</td>
<td>1</td>
<td>Existing commitment – National Waste Strategy should clearly identify strategies/milestones already agreed to as part of the National Food Waste Strategy</td>
</tr>
<tr>
<td><strong>Strategy 2: Design</strong> - Design systems and products to avoid waste, conserve resources and maximise the value of all materials used at every stage of a product’s life</td>
<td>3</td>
<td>Revised wording: Design materials, products and systems to avoid waste, conserve resources and maximise the value of all resources used at every stage of a product’s life</td>
<td>Government &amp; bBusinesses implement actions to avoid waste and support eco-design of products that increases a product’s lifecycle (including avoidance of toxic/hazardous materials, disassembly and repair and future life) by 2020.</td>
<td>2</td>
<td>Governments have a role in designing the systems and setting the standards for design. What business incentives/regulations will achieve this?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>NEW – Australian Government places obligations on importers of products to provide information on their product’s environmental risk and end of life</td>
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<td></td>
</tr>
</tbody>
</table>

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**Submission on Discussion Paper: Updating the 2009 National Waste Policy**

October 2018
| Strategy 3: Knowledge sharing, education and behaviour change - Apply waste hierarchy and circular economy principles to design, implement coordinated initiatives that address the needs of governments, businesses and individuals, and incentivise the redesign, reuse, repair, resource recovery, recycling and remanufacturing of products | 2 | Too long and complex for a strategy | Infrastructure, and information sharing. Regulation where necessary and incentives are in place to support redesign, reuse, repair, resource recovery, recycling and remanufacture of products by 2025. Targeted behaviour change consumer education strategies in place across Australia with evidenced-based messaging about sustainable consumer choices, avoiding and reducing waste, improved recycling and resource recovery, waste reduction strategies by 2021. |
| Strategy | Do you agree?  
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategy 4: Product Stewardship</strong> - Develop and implement partnerships across government and business to ensure ownership and responsibility for action to minimise the negative environmental impacts from products and materials, ensure the minimisation of waste and maximise reuse, repair and recycling of products and materials throughout their life cycle</td>
<td>2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>If not, why not?</th>
</tr>
</thead>
</table>
| **Interim Milestones**  
(revisions in red, new milestones in green) | Do you agree?  
Ranking: 1 yes, 5 no  
If not, why not? |

| **Framework that prioritises mandatory over voluntary schemes** for national action on products, through product stewardship, endorsed and used by all governments by 2019 | 2  
There is need for more mandatory schemes particularly where voluntary schemes are not achieving desired outcomes. |

| **Current product stewardship schemes reviewed in line with prioritisation framework and agreed by 2020** | 1 |

| **Findings and recommendations of the Product Stewardship Act review are implemented by 2020.** | 3  
Findings and recommendations have not been released so need to see before agreeing |

| **National end-of-life management system for photovoltaic panels and batteries designed by 2020** | 3  
COMBINE - National end-of-life management system for photovoltaic panels and batteries designed by 2020 and implemented by 2025. |

| **End-of-life management process for photovoltaic panels and batteries in place by 2025, or earlier** | 3 |

| **100 per cent of packaging designed to be reusable, recyclable or compostable in Australia by 2025** | 2  
This target is nearly met as most packaging is reusable, recyclable or compostable somewhere in the world – it assumes export. Milestone needs to be broken down into categories. |
<table>
<thead>
<tr>
<th>Strategy 5: A common approach -</th>
<th>Action plans on policy priorities to achieve a common approach agreed by 2019. This will include common approaches towards transportation of waste and recycling (particularly to support market development), national energy from waste policies (consistent with the waste hierarchy), landfill levies, and minimisation of regulatory inconsistency</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>National classifications and definitions agreed for data and reporting on wastes and recycling by 2020</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Priorities for common national standards and specifications agreed by 2020</td>
<td></td>
</tr>
<tr>
<td><strong>Strategy 6: Improving Access</strong></td>
<td>Programs implemented/established by 2020, in collaboration with regional, remote and Indigenous communities, to that increase access to resource recovery and waste management infrastructure</td>
<td>2</td>
</tr>
<tr>
<td><strong>- Identify and improve the ability of regional, remote and Indigenous communities to access to waste and</strong></td>
<td>2</td>
<td>See rewording</td>
</tr>
<tr>
<td><strong>resource recovery infrastructure at an appropriate scale and services and improve their ability to participate in the local circular economy</strong></td>
<td><strong>and services</strong>, and associated education and training by 2020</td>
<td><strong>Access to resource recovery and waste management infrastructure for regional, remote and Indigenous communities increased/improved in every state and territory by 2025.</strong></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>New milestone:</strong></td>
<td><strong>Regional and local circular economy resource recovery pilots operational by 2020.</strong></td>
<td><strong>See rewording</strong></td>
</tr>
</tbody>
</table>

| **Strategy 7: Increasing industry capacity** - Identify and address opportunities across municipal solid waste, commercial and industrial waste, and construction and demolition waste streams for improved recycling and resource and energy recovery, to deliver ongoing improvements in diversion from landfill, and support the transition to a circular economy implementation of the waste hierarchy. | **2** | **See rewording** | **Identify opportunities for growing skills and competencies in the waste management and recycling sectors and invest in skills development by 2019.** | 2 | See rewording |
| --- | --- | --- | **Identify Consider opportunities to improve planning for waste infrastructure by 2019.** | 2 | See rewording |
|  |  |  | **Undertake a national inventory of waste and resource recovery infrastructure and capacity by 2019 and establish or improve recycling and resource recovery infrastructure where required by 2025 including attracting new players.** | 2 | See rewording |
|  |  |  | **Report on capacity of the resource recovery and recycling sector to meet targets by 2020** | 3 | What targets are we referring to? Only target is 80% average recovery rate from all resource-recovery streams, following the waste hierarchy by 2030. It is unclear how |

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**Submission on Discussion Paper: Updating the 2009 National Waste Policy**

October 2018
| | | | | data will be made available by industry. |
|---|---|---|---|
| Investigate Consider the development of voluntary standards for material recovery facilities and the construction and demolition sector by 2020 | 2 | See rewording It may be appropriate for minimum standards for facilities to be regulated. |
| National Packaging Targets, focused on recycling rates, achieved by the Australian Packaging Covenant Organisation by 2025 | 2 | |
| NEW – Support the transition to the circular economy | | | |
| NEW - Develop a national strategy to support investment in R&D, innovation and advanced technologies to increase resource recovery and remanufacture as well as market development for products with recycled content by 2020 with implementation by 2025 | | | |
## Principle 3: Increase use of recycled material and build demand and markets for recycled products

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Do you agree? Ranking: 1 yes, 5 no</th>
<th>If not, why not?</th>
<th>Interim Milestones (revisions in red, new milestones in green)</th>
<th>Do you agree? Ranking: 1 yes, 5 no</th>
<th>If not, why not?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategy 8: Sustainable procurement by governments</strong> - All levels of Australian governments create and promote demand for recycled materials and products containing recycled content; consider environmental issues in their approach to goods and infrastructure procurement and promote demand for recycled materials and products containing recycled content</td>
<td>3</td>
<td>All Australian governments to adopt, implement and report on their sustainable procurement policies or guidance with measurable, publicly reported targets for use of Australian and imported recycled content by 2020; Develop a National Waste Account and establish a baseline to measure changes; Establish a baseline through a new National Waste Account from which to measure changes in procurement of goods containing Australian and imported recycled materials by 2020; Set mandated, publicly reported targets of 30 per cent for average recycled content in 5 priority procurement categories for goods and products and materials purchased by governments, by total volume, by 2025</td>
<td>2</td>
<td>Opportunity to build in recycled content reporting in govt annual report</td>
<td></td>
</tr>
</tbody>
</table>

| **Strategy 9: Sustainable procurement by business and consumers** - | 2 | Review of regulatory barriers and opportunities (including regulatory) for use of recycled content in products by 2020 | 2 | Categories eg infrastructure, civil construction, general goods |
Businesses and individuals in Australia take environmental issues into account when purchasing, importing or manufacturing goods and services, and promote domestic demand for recycled materials and products containing recycled content.

<table>
<thead>
<tr>
<th>Objective</th>
<th>Action</th>
<th>Target Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Innovation Fund to support resource recovery and remanufacturing of products with recycled content, uses for recycled content better supported in place by 2020</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>How will priorities be determined? Explain reasons why we need common approaches to standards – so that product/industrial designers, manufacturers and waste industry can design for recovery.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>National Packaging Targets, focused on recycled content in packaging, achieved by the Australian Packaging Covenant Organisation by 2025</td>
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<td>Increasing the demand for recycled content could reduce the quality of the recycling stream – need to balance against targets for avoidance and reuse of packaging.</td>
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<td>Standardised national product labelling indicating percentage of Australian and imported recycled content in packaging in place by 2020</td>
<td>2</td>
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<tr>
<td>Australian businesses adopt, implement and report on their sustainable procurement policies or guidance with measurable targets for use of recycled content by 2025</td>
<td>1</td>
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<td>Reporting requirements should be built into annual reporting requirements</td>
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<tr>
<td>Set voluntary, publicly reported targets 30 per cent for average recycled content in 5 priority procurement categories for goods and products and materials</td>
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<td>Categories eg infrastructure, civil construction, general goods</td>
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<tr>
<td>NEW - Investigate the feasibility of using economic instruments such as taxes and financial incentives to create demand for products with Australian recycled content compared to virgin material content by 2020.</td>
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<tr>
<td>NEW – Undertake a review by 2020 of existing rating schemes for eg products, infrastructure and civil construction and ensure that waste avoidance and minimisation, reuse, recycling, resource recovery and use of recycled content is included and weighted appropriately.</td>
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</tbody>
</table>
Principle 4: Better manage material flows to benefit human health, the environment and economy

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Do you agree? Ranking: 1 yes, 5 no</th>
<th>If not, why not?</th>
<th>Interim Milestones (revisions in red, new milestones in green)</th>
<th>Do you agree? Ranking: 1 yes, 5 no</th>
<th>If not, why not?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategy 10: Plastics and packaging - Reduce the environmental impacts of plastic and packaging, reduce plastic pollution, and maximise benefit to environmental and human health as well as the economy and society</strong></td>
<td>2</td>
<td></td>
<td><strong>Targets established to p</strong>hase out priority problematic and unnecessary single-use plastic packaging by 2019</td>
<td>3</td>
<td>Are priorities single use plastic bags and general purpose straws?</td>
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<td><strong>Problematic and unnecessary plastics, including single-use plastic packaging identified and prioritised by 2020</strong></td>
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<td><strong>100 per cent of microbeads from rinse off cosmetic and personal care products phased out by 2020, and options examined to broaden phase out to other products</strong></td>
<td>1</td>
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<td></td>
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<td><strong>Problematic and unnecessary single-use plastic packaging phased out through redesign, innovation, or alternative delivery methods by 2025</strong></td>
<td>1</td>
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<td><strong>NEW – Develop a system to manage the import, use, manufacture and end of life disposal of plastics and packaging to minimise environmental and human health impacts by 2025.</strong></td>
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<tr>
<td>Strategy 11: Sound management of chemicals and hazardous waste - Implement reforms to minimise and manage chemicals and wastes throughout their lifecycle to minimise environmental and human health impacts and meet Australia's international obligations</td>
<td>NEW – Collaborate to prioritise preventative actions for microfibres by 2020 and implement actions by 2025</td>
<td>Eg filtration devices on washing machines</td>
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<td>2</td>
<td>Develop consistent, transparent, predictable and streamlined regulation to minimise and manage environmental risks of chemicals and wastes for all Australians by 2025</td>
<td>2</td>
<td>See rewording</td>
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<tr>
<td>3</td>
<td>Better manage and report on the import, export, use, manufacture and end-of-life disposal of products and articles containing hazardous substances by 2025</td>
<td>3</td>
<td>How will we know that we are better managing and by when?</td>
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<tr>
<td>1</td>
<td>Prevent or significantly reduce environmental and human exposure to chemicals and wastes that are known to be hazardous, bio accumulative or persistent by 2020</td>
<td>1</td>
<td>How does this align to UNSD Goal 12?</td>
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<td>2</td>
<td>Evaluate and report on Consider the performance of Australia’s hazardous waste management framework in reducing and managing hazardous waste, including new and emerging wastes, by 2020</td>
<td>2</td>
<td>See rewording</td>
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<tr>
<td><strong>Strategy 12: Organic Materials - Reduce the generation and landfill disposal of organic waste, including garden and food waste, by avoiding their generation and supporting diversion of remaining material to higher order uses soils and other uses, supported by appropriate infrastructure</strong></td>
<td><strong>2</strong></td>
<td><strong>Identify high priority hazardous substances and support development of national plans for reduction and management by 2020</strong></td>
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<td><strong>Divert batteries from landfill through a product stewardship scheme or other appropriate end-of-life management system, by 2025</strong></td>
<td><strong>Businesses across the food supply and consumption chain become signatories to the voluntary commitment program to reduce food waste by 2019</strong></td>
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<td><strong>Government has already allocated funding to oversee voluntary commitment program</strong></td>
<td><strong>Work underway in every Australian state and territory to better manage organic material by 2020</strong></td>
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<td><strong>Well underway in NSW. Needs to clarify what outcome is desired – eg develop end markets</strong></td>
<td><strong>25 per cent reduction in organic waste sent to landfill by 2025</strong></td>
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<td><strong>low targets for NSW – NSW could act as a case study for other jurisdictions to follow</strong></td>
<td><strong>NEW – Investigate and report on strategies to increase the recovery of organics from municipal solid waste by 2019 and implement strategy to achieve greater recovery of MSW by 2025</strong></td>
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<td><strong>NEW – Strategy: Identify, map and manage recyclate material flows to maximise opportunities for</strong></td>
<td><strong>Develop a national online exchange to reduce transaction costs for recyclate buyers and sellers and to bring transparency</strong></td>
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<td>procurement and remanufacture</td>
<td>to available stockpiles, location (transport costs), quality and contamination levels by 2025</td>
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<td>Develop national indexes of market information available for use in processing contracts</td>
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<td>Develop a common regulatory approach to stockpiling of waste products for reuse and recycling to enable quantities of certain types of material [inerts?] to be stockpiled for efficient transportation and use</td>
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</table>
## Principle 5: Improve information to support innovation, guide investment and enable informed consumer decisions

<table>
<thead>
<tr>
<th>Strategy</th>
<th>Do you agree?</th>
<th>If not, why not?</th>
<th>Interim Milestones</th>
<th>Do you agree?</th>
<th>If not, why not?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategy 13: Data and reporting</strong> - Continue to improve national data and reporting on material flows, wastes and recycling, including economic aspects and reporting indices, to support consumers and manufacturers to make more informed decisions</td>
<td>1</td>
<td></td>
<td>Publish biennial National Waste Reports that drill down to local government level in transition to real time reporting by 2025, and including data generated through a new National Waste Account by 2020</td>
<td>1 yes, 5 no</td>
<td>We already do public biennial National Waste Reports so not really a milestone. Data on infrastructure inventory should also be included.</td>
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<td>Investigate options for the production of infrastructure, trade and market information, including imported and exported product and packaging information and material flows, by 2020 and implement by 2025</td>
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<td>By infrastructure do you mean indexes or exchanges? unclear</td>
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<td>Data and reporting improvements program implemented by 2020</td>
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<td><strong>Strategy 14: Market development and research</strong> - All Australian governments and businesses generate and report information to support creating and maintaining markets for recycled materials, both domestically and internationally</td>
<td>1</td>
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<td>Review existing recycling data collection methodologies by 2020</td>
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<td>Analyse barriers and opportunities in markets for goods containing recycled content by 2018, and review every five years</td>
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<td></td>
<td>Ensure resources and funding are available to improve support for innovation and research and development in waste management and recycling by 2025</td>
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