



**SSROC submission on the
NSW Government *Waste Levy Review*
Issues Paper May 2024**

**Submitted to the NSW Environment Protection
Authority
by email:
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1 Introduction

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of 12 councils spanning Sydney's southern suburbs, eastern suburbs, CBD, and inner west and covering a third of the Greater Sydney's population, over 1.8m people. Our Councils manage around 655,000 tonnes of household waste each year, which is about 20 per cent 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, procurement, waste, and planning.

In this submission, we have collected feedback on the *Waste Levy Review Issues Paper* from our member councils and summarised their feedback below. The next section summarises our key recommendations, followed by responses to the survey questions and some feedback on the Issues Paper.

2 Summary

Reinvestment of the Waste Levy

Under the *Protection of the Environment Operations (Waste) Regulation 2014* (POEO Act), the objective of the NSW Waste Levy is to encourage waste minimisation and diversion of waste from landfill. The levy was effective initially in increasing diversion from landfill, its effectiveness has plateaued: infrastructure and technology have not kept pace with waste generation and product development. This is evident in Sydney's waste management system today, which is facing a rapidly approaching crisis, due to a lack of investment in critical waste infrastructure to service Sydney's growing volumes of waste.

With over 80%¹ of the Levy going into consolidated revenue this objective and the requirements under the Act are not being met. The levy, which is passed through ultimately to consumers and ratepayers, does not drive the necessary technology and infrastructure development and delivery, it increases costs to the community. Our principal recommendation is therefore to reinvest the Waste Levy back into waste minimisation programs, in order to achieve the levy's original objective. We provide the following solutions on how to achieve this:

1. Amend the NSW Protection of the Environment Operations (POEO) Act 1997 or Waste Avoidance and Resource Recovery (WARR) Act 2001 to mandate full hypothecation of revenue raised from the Waste Levy back into the local government and industry services² that support a transition to a circular economy and cover waste avoidance, reuse and resource recovery. This has been a consistent request from councils across the state, even getting closer

¹Of the \$771 million generated NSW levies in 2017/18, only 19.9% of NSW waste levies were spent on waste and recycling activities, inclusive of State EPA agency funding. This information was taken from SSROC's *Legislative and Regulatory Reforms for Achieving a Circular Economy September (2020)*, this may have changed since 2020.

² The term 'industry services' here refers to organisations offering waste avoidance, reuse, recycling, energy from waste and disposal services including collection and processing but is not limited to organisations in the waste sector because charities, not for profits and commercial organisations also provide reuse solutions for both excess stock and post-consumer products.

to QLD's 70% reinvestment and gradually getting towards 100% over time would help deliver NSW's waste and circular economy targets.

2. Amend the POEO Act or WARR Act to fix a high percentage of the Waste Levy income into a separate ring fenced fund used only for waste minimisation and resource recovery purposes. This fund should be independently managed and audited for full transparency, with successful examples of this in both QLD and NZ (discussed in more detail on page four of this submission).
3. Consider a reduced, concessional Waste Levy rate for NSW councils municipal solid waste (MSW). Councils' expenditure on waste levies takes up a significant proportion of the Domestic Waste Management Charge (DWMC) paid by local communities. When the DWMC is needed to cover Waste Levy fees, this contravenes the intent of the legislation governing the DWMC which specifies that it must be spent on recovery in the community from which it was collected. A concessional Waste Levy rate should be discussed with councils in more detail as it could help ensure a higher proportion of the DWMC goes back into recovery in the local community.

In addition, a higher reinvestment of the Waste Levy would allow the NSW Government to invest in critical waste infrastructure in NSW as identified by the EPA's infrastructure needs study and the NSW Waste Infrastructure Plan currently under development. Funding to implement the NSW Waste Infrastructure Plan will be needed and should be planned for as part of this Waste Levy review to help address critical infrastructure shortages such as the urgent need for transfer and processing infrastructure to process Sydney's MSW with the upcoming closure of Lucas Heights; as well as for non-putrescible landfill and additional options for transfer and processing facilities for the increased volumes of FO/FOGO.

We are concerned that without greater investment in the sector, rising costs of current services, including the cost of the Waste Levy, may force NSW councils to reduce non-essential collection and recovery services, and that this will be at the expense of the State's targets. Reinvestment of the waste levy would seem to be a clear option for funding this investment, and entirely consistent with the levy objective.

Waste Levy Exemptions

This submission details several recommendations on pages 8-9 for Waste Levy exemptions including:

- An exemption should apply to asbestos waste that is presented at a waste disposal facility by either council or a contractor disposing of asbestos on behalf of council.
- Exemptions or concessional levy rates for disposal of illegal dumping, street sweeping and litter management managed by council or a contractor disposing of these items on behalf of council.
- Concessional levy rates need to be considered for reuse specialists who are trying to achieve beneficial outcomes yet have to pay for the residual waste from poor donations and dumping.
- Levy exemptions should also be considered for disposal of dredging material from stormwater treatment devices, such as gross pollutant traps and stormwater treatment facilities.

3 Response to Survey Questions

Question 1: What are your views on the current levy rates and levy area boundaries? Should they be changed?

Current levy rates and projected rises are too blunt an instrument to support the range of desired environmental outcomes outlined in NSW and Local Government strategies. Hypothecation is successfully implemented elsewhere in Australia, sometimes in states with far less ambitious environmental and strategic aims.

In 2018-19, NSW reinvested only 11.5%³ of Waste Levy revenue into the sector versus:

- 66% in Victoria applied to EPA/Sustainability Victoria or other bodies,
- 50% in South Australia allocated to the Green Industry Fund,
- 70% in QLD,
- 25% in WA,
- 100% in TAS
- Neighbouring countries like New Zealand achieve 100% reinvestment of their Waste Levy comprised of 50% allocated to councils, 50% allocated to Ministry of the Environment.

Of the \$771 million generated NSW levies in 2017/18, only 19.9% of NSW waste levies were spent on waste and recycling activities, inclusive of State EPA agency funding⁴.

Meanwhile the levy has increased by 148% over the last ten years, Waste Less Recycle More (WLRM) funding decreased in its last eight years of operation. Funding from the levy through WLRM was the most significant source of funding for resource recovery programs, yet SSROC councils on average received only 6-7% of the levy they paid through disposal service fees and charges. Today, with the removal of WLRM there is no State funding available to councils for waste and resource recovery services outside of competitive short-term grants.

There is a strong case for full hypothecation of the NSW Waste Levy and this continues to be a priority for our member councils, and this should not be discounted as an impossible option when it has been achieved in TAS, NZ and when QLD is able to achieve 70% and 66% in Victoria. NSW Treasury could plan for a gradual transition to 100% reinvestment of the Waste Levy over time to help both realise NSW's waste reduction targets and to mitigate the loss of Waste Levy income to other government portfolios.

Another option is to fix a percentage of Waste Levy income to be allocated to a separate ring fenced fund used for waste minimisation specific purposes. In NSW, no fixed percentage of Waste Levy funds is devoted to waste minimisation projects, nor is there transparency or disclosure about how NSW Waste Levy funds are spent.

³ The NSW percentage was correct in 2020 and from SSROC's *Legislative and Regulatory Reforms for Achieving a Circular Economy September (2020)*, this may have changed since 2020.

⁴ *Legislative and Regulatory Reforms for Achieving a Circular Economy September (2020)* – SSROC commissioned Clayton Utz to undertake a review of NSW waste legislation and policy to identify barriers, opportunities and recommendations for legislative and policy changes to support a transition to a circular economy.

SSROC recommends that the POEO Act or WARR Act is amended to:

- a) Fix a percentage of Waste Levy income to be allocated to a separate ring fenced fund used for waste minimisation/resource recovery specific purposes. In practice this percentage might be allocated to an independent resource recovery and recycling agency which would distribute the funds according to its business plan or strategic objectives;
- b) Like NZ a portion of this fixed percentage or indeed a separate allocation could be dedicated to local councils directly to support sustainable waste minimisation and resource recovery initiatives and mitigate the rising costs of these services, under some oversight; and
- c) Criteria should be prepared and enshrined in order to make it clear how this income can be allocated. The criteria would add transparency to the process and have the added benefit of clarifying for grants or funding applicants how the funds might be applied.

Another option to explore is a reduced, concessional Waste Levy rate for NSW councils for providing household and community waste services. Councils' expenditure on waste levies takes up a significant proportion of the Domestic Waste Management Charge (DWMC) paid by local communities. When the DWMC is needed to cover Waste Levy fees, this contravenes the intent of the legislation governing the DWMC which specifies that it must be spent on recovery in the community from which it was collected.

A concessional Waste Levy rate should be discussed with NSW councils in more detail as it could help ensure a higher proportion of the DWMC goes back into recovery in the local community. It could also help mitigate rising waste and recovering costs.

The NSW Government is also missing an opportunity to leverage the Waste Levy as a policy tool to advance NSW Net Zero Plan, and the Circular Economy ambitions in the NSW Waste and Sustainable Materials (WaSM) Strategy 2041. The ambitions in these two plans are time-tested with the community and local government and would be a much clearer political and public relations link to reducing waste to landfill and generating the waste infrastructure business case to Government.

The task of building social licence to build and operate waste infrastructure and facilities is primarily in the hands of local government (Mayors and Councillors) and with industry. This is a difficult endeavour, particularly when the commercial entity acts unilaterally without the endorsement of Council to secure land and community buy-in. This adds to the oft-cited "10 years to build" a facility in Sydney.

There is further evidence that State Government has abrogated its role in building social licence for waste infrastructure: recent strategies, action plans and budgets from Infrastructure NSW, Transport for NSW and NSW Planning do not identify waste processing infrastructure as a priority. Yet their plans and budgets are reliant upon consolidated revenue and therefore on the Waste Levy, and signal Government transport, health, housing and environmental infrastructure. This pits the waste industry, which is fundamentally a critical public health service, and indeed

Local Government, in an adversarial role against critically important hospitals, schools, roads and natural reserves.

This reality signals and incentivises a lack of political will to lower levy income by reducing landfill, or to signal to departments across NSW that waste infrastructure ranks as a high priority. The impending closure of landfills and the absence of any solution for residual waste in Sydney, clearly indicate that this situation needs urgent attention and appropriate priority if a waste crisis (with its attendant public health risks), is to be averted. Social licence for waste infrastructure would be easier to achieve in the community if linked to Net Zero, circularity, *Remade in Australia* and local jobs. Similarly, a clear demonstration of political support would boost industry confidence in investment opportunities identified by NSW EPA.

The conclusion of the NSW Auditor General's Report on *Waste Levy and grants for waste infrastructure* noted that "Grant funding programs have supported increases in recycling capacity but are not guided by a clear strategy for investment in waste infrastructure which would help effectively target them to where waste infrastructure is most needed". The Department of Planning, Housing and Infrastructure must have a role in planning for strategic waste infrastructure.

The Issues Paper 4.1, page 20, states:

"The Waste Levy is only effective as a tool to divert waste from landfill where there are alternatives to landfill available."

SSROC agrees. And there is a lack of alternatives to landfill. The ever-increasing Waste Levy creates no incentive for the recycling sector to innovate or lower its costs by increasing efficiency. The sector need only keep its costs below the cost of landfill (including the Waste Levy). Barriers to entry into the reuse, recovery and recycling industry are generally very high: a significant investment in infrastructure is required, timeframes for planning approvals are long, social licence is extremely difficult to achieve and the cost of land is high.

The NSW EPA has itself articulated the urgent need for waste infrastructure to service Greater Sydney and growing population centres, and to pivot efforts to enabling landfill upgrades for gas capture, and treatment of residual waste such as energy from waste (EfW). With Sydney's putrescible landfills scheduled to close in less than 12 years, alternative treatment technologies for all wastes will play a critical role. Pricing for alternative treatment is not proven to compete with the cost of landfill – even with the forecast growth of the Waste Levy – and presents a major risk.

SSROC has no objections regarding the existing levy area boundaries.

Question 2: How can we best prevent opportunities for operators to avoid lawful disposal costs in NSW through illegal or unsustainable activity?

SSROC supports the removal of the Waste Levy on the disposal of asbestos-containing material (ACM), as it is one of the most costly and hazardous materials to public health. Subsidies or levy exemptions should reasonably flow on to licensed disposal facilities who can use the relief to upgrade their facilities or service offering.

Removing the levy on ACM, would lower the cost of correct disposal and potentially reduce the proliferation of hazardous dumps.

We are not aware of any perverse outcomes from removing the Waste Levy from ACM because it would still be higher to landfill ACM than landfilling general waste, there is no incentive for councils to dispose of waste by claiming it's asbestos waste. For example, one member Council's contracted rates for landfill disposal of general waste, inclusive of the Waste Levy, range from \$250-\$300. Asbestos landfill rates are around \$600 per tonne. Even with the levy removed asbestos landfill rates would be higher than contracted rates for general waste landfill disposal (around \$460 per tonne for asbestos without the levy) so there would be no incentive for local government to try and claim waste is asbestos when it is other material. For this reason, an exemption should apply to asbestos waste that is presented at a waste disposal facility by either council or a contractor disposing of asbestos on behalf of council.

Sustainable waste management also includes managing this unlawful behaviour. SSROC is concerned that high tipping fees exacerbate dumping around or in sensitive bushlands around disposal facilities; raising the levy could trigger an increase in this illegal activity. The cost of managing of this type of dumping is considerable to councils.

Question 3: What factors need to be considered when looking at current exemptions, discounted (concessional) levy rates and levies on liquid waste and coal washery rejects?

SSROC would like to see exemptions (or at least concessional levy rates) for disposal of illegal dumping, street sweeping and litter management. These are services council manages where there is no direct correlation between the waste generator and the levy payer, and the levy therefore does not provide any incentive to reduce unlawful behaviour.

Furthermore, the levy cannot incentivise recycling for these products because there are no viable recycling alternatives. Councils cannot use the Domestic Waste Management Charge (DWMC) to manage litter, dumping or public place recycling, and the non-contestable BWRP is now disbanded. Without levy relief, these costs force council staff to reduce actions in other areas, such as prevention, education and enforcement, particularly in Crown- or State-owned bushland, thereby undermining NSW Government objectives.

Concessional levy rates need to be considered for reuse specialists who are trying to achieve beneficial outcomes yet have to pay for the residual waste from poor donations and dumping. This would require more discussion with Charitable Reuse Australia and reuse organisations to understand what criteria, definitions and rules should apply such as would it need to be limited to organisations that:

- Collect reusable items for free
- Collect items primarily for reuse, repair or repurposing
- Are not funded or getting levy concessions through another NSW government program.

Smaller businesses and social enterprises are often running operations at very thin margins, and the exemption or concessional levy would reduce a significant financial risk, allowing them to generate more jobs and increase service provision. This would allow operational efficiency and productivity, release revenue for other service provision and staffing, and reduce capital and operational cost burdens to allow reuse and recovery enterprises to absorb and re-invest earnings.

Our councils have also raised the issue of whether a concessional levy rate should be considered for contamination from household recycling and organics streams, and from CRCs. This would also require more discussion with councils, MRFs, organics processing facilities, mattress and e-waste recyclers to understand what criteria would need to apply and to prevent any misuse.

Levy exemptions should also be considered for **disposal of dredging material from stormwater treatment devices**, such as gross pollutant traps and stormwater treatment facilities. Dredgings and spoils from these devices can be beneficially reused as cover in licensed waste facilities, though since November 2022 have been eligible for the Waste Levy. These cost increases threaten maintenance programs for stormwater quality infrastructure and water sensitive urban design programs, and potentially lead to increased sedimentation and pollution in the marine ecology and water quality.

Question 4: How can we streamline Waste Levy deduction requirements and processes?

Streamlining Waste Levy deduction requirements and processes could involve:

- Simplifying documentation and reporting requirements for deductions that apply to operational materials.
- Implementing a centralised digital platform for submitting and processing levy deductions.
- Providing clear guidelines and training for facility operators on how to comply with levy deduction processes.
- Establishing a dedicated support team to assist with queries and resolve issues related to levy deductions promptly.

Question 5: What other actions do you think the NSW Government could do to support the circular economy objectives of the Waste Levy?

The NSW Government has set ambitious waste avoidance, resource recovery targets and mandates for local government to meet yet the level of Waste Levy income reinvested back into the sector is very low. These targets and mandates are unrealistic and untenable without significantly higher financial investment by the NSW Government which could be achieved through a higher reinvestment of the Waste Levy to services, infrastructure and projects that achieve waste and resource recovery targets. The NSW WaSM Strategy does not have a plan for how meeting the targets will be funded, or how levy funds could be used and that needs to change.

Additionally, the Issues Paper predominantly focuses on “driving greater recycling in NSW” and that “waste levies are a tool to promote recycling”, without acknowledging

the role of reuse and repair in diverting items from landfill. It's important that consultation on the NSW Waste Levy and other waste policies acknowledge and support higher order reuse and repair activities not just increases in recycling. Consideration should be given to how Waste Levy income could support greater source separation of materials, collection and labour intensive processes like sorting, and scaling reuse and repair initiatives across NSW.

Greater co-location of reuse, repair and re-manufacturing onsite at primary processing centres, such as MRFs, landfills/treatment facilities, and bulky waste recyclers should also be supported. The Department of Planning, Housing and Infrastructure must have a role in strategic planning for circular economy precincts.

Question 6: *Is there anything you would like to provide further feedback on?*

The premise in the Issues Paper that domestic generation correlates with levy rises is not valid

SSROC Member councils do not support the analysis presented by Marsden Jacob Associates on page six that reports municipal solid waste (MSW) generation rates are correlated and responsive to the rise of the Waste Levy. If the Government accepts this reasoning, it could lay the groundwork for business-as-usual increases in the levy. Metropolitan councils have many drivers that correlate with waste generation, but the levy does not factor as a community driver for behaviour change.

The levy was introduced partly to make recycling more cost-competitive with landfill – this is working with construction and demolition (C&D). But the Marsden Jacob data shows there is clearly a ceiling of positive impacts for continuing to raise the levy on domestic and commercial and industrial (C&I) waste.

There are more tangible correlations that decrease municipal solid waste (MSW) generation, such as reduced frequency of collections or reducing bin sizes. Light weighting of packaging, changes to product design, successful product stewardship schemes, and increased access to recycling drop-off options are also well known to reduce MSW generation. Sydney's cost of living pressures is a much greater driver for waste reduction and reducing consumption than the Waste Levy.

As the NSW waste industry absorbs the cost of onshoring recyclable packaging and transitions its business capacity to more circularity, the cost of recycling will stay high and rise, both for kerbside mixed waste and also for source separated 'clean' streams such as textiles, electronic waste, whitegoods and mattresses. More recyclers in the marketplace for bespoke recovery and re-manufacturing are welcome, but councils are bearing the net costs of recycling these streams, and shouldering the reputational cost if they falter. Nonetheless the community expects Council to take the lead in providing more opportunities to recycle.

However, as waste volumes grow, councils are faced with two options:

- a) Pay the high costs, and reduce other services to the community; or
- b) Increase the domestic waste management charge, placing further burden on households to cover the costs.

Mattresses, textiles, soft plastics, electronic waste and expanded polystyrene are significant portions of household waste and are presented in volumes which often exceed council's capacity to collect, aggregate and process. For example, in Sydney to recycle mattresses can cost between \$45-100 per unit to recycle, clothing unsuitable for reuse can cost \$2000-3000 per tonne if processed onshore, e-waste, soft plastics and polystyrene are also expensive to recycle.

In the absence of effective cost sharing through extended producers schemes, councils are often forced to collect and process these bespoke streams to avoid illegal dumping and meet community demands as well as State recovery aims. However, the costs are often not fully recovered by the Domestic Waste Management Charge (DWMC) and as councils receive no funding from the Waste Levy for these streams councils struggle to make the economics work. The demands of consumption and population are growing, waste targets and ambitions are rising, and with non-contestable funding discontinued councils often cannot keep up. We are concerned that NSW councils may have to reduce non-essential collection and recovery services due to rising costs and no returns from the Waste Levy, and that this will be at the expense of the State's targets.

Reinvesting the Waste Levy

Funds raised from the Waste Levy should be used in alignment with the stated objective of the levy:

"To reduce the amount of waste being landfilled and promote recycling and resource recovery"⁵.

However, it would be critical to recognise that meeting this objective would involve a broader range of activities and infrastructure than is currently generally recognised as waste management. The current public perception is likely to be of waste collection, recycling, green waste and waste disposal. To meet the objective, "waste management" would include, for example, waste avoidance, reuse and repair initiatives, circular economy precinct development, remanufacturing research, education, regulatory reform, residual waste processing and reduction in carbon emissions from waste.

With this broader concept of more sustainable waste practices, it is evident that funding is needed not only to mitigate the impact of rising waste management costs on ratepayers and industry, but for an overhaul of the waste ecosystem.

Levy funds could be used to:

- Support the reuse, repair and re-manufacturing sector provided suppliers can provide sound evidence of emissions reduction, carbon capture and circular outcomes.
- Incentivise council investment and sourcing of materials with locally processed, Australian Standard-specified recycled content, and leverage the *Made in Australia* brand with *ReMade in Australia*.

⁵ NSW EPA <https://www.epa.nsw.gov.au/your-environment/waste/waste-levy>

- Jumpstart and sustain product stewardship schemes and help to cover council costs for collecting and organising drop-off sites. Effective product stewardship arrangements need to ensure cost-sharing is equitable, with producers or manufacturers taking their fair share of the financial burden to avoid so-called "free-riding". Levy funds could also uphold a separate NSW Government Product Stewardship Commission to amplify these schemes and ensure accountability.
- Reward re-investment/upgrades of facilities on a merit-based system, provided they are achieving best practice overall decarbonisation in their upgrade. Expand the Australian Carbon Credit Unit (ACCU) methodology so that these facilities are receiving and/or sharing revenue ongoing. Apply levy rebates to EfW facilities and landfills which deploy/upgrade carbon capture and beneficial reuse of methane. Work with recyclers and their off-take arrangements to ensure quality feedstock and recycled content products.
- Improve the business case for phasing in landfill bans for specific items, and inform NSW Government what treatments, markets and product stewardship schemes are needed. Europe and Canada have installed bans for combustible waste, fly ash, comingled recycling, electronic waste and pre-consumer stock.
- Fund a dedicated Circular Economy investment program such as QLD's recent [Circular Economy Investment Program](#) where criteria for funding prioritises higher order waste hierarchy objectives which isn't articulated as a high priority in current NSW grants or investment programs.
- For new options for local governments to procure and fund shared-stake projects to allow for the efficient delivery of affordable and sustainable services, the delivery of new waste infrastructure and the development of a more competitive market. Recently when encouraging commercial start-ups, government funding in Queensland was provided in exchange for a shareholding stake – often with attractive redemption rights that are designed to allow the government entity to recoup its investment if the entity is successful and then further recycle the funds. In these instances, the funding amounts have often been relatively small. If funding is provided in exchange for a shareholding stake, theoretically section 50 of the Competition and Consumer Act 2010 could apply to that acquisition of shares so in such cases the government entity would need to consider whether that acquisition could be said to have the likely effect of substantially lessening competition.

Reputational risks from the misuse of Waste Levy Income

Councils' expenditure on waste levies takes up a significant proportion of the Domestic Waste Management Charge (DWMC) paid by local communities. As discussed earlier, when the DWMC is needed to cover Waste Levy fees, this contravenes the intent of the legislation governing the DWMC which specifies that it must be spent on recovery in the community from which it was collected. Continuing to have such a high portion of the ratepayer-funded Waste Levy charges go into consolidated revenue – when it should go directly back into improving waste services so that recovery rates can be increased – is an untenable position for both NSW councils and NSW state agencies.

Furthermore, the lack of transparency about how the Waste Levy is spent is a reputational risk for state government with the perception that the NSW Government transport, health, education and finance portfolios are benefiting financially from the

community's Waste Levy payments, with a reported \$687.7M going into consolidated revenue in the 2018-19 financial year. Using the DWMC to cover Waste Levy fees when that funding is not reinvested in back into waste avoidance and resource recovery not only contravenes the legislation governing the DWMC but also unnecessarily leaves state and local government vulnerable to criticism.

There is also a potential conflict of interest inherent in an NSW government agency such as the NSW EPA primarily funded by Waste Levy income conducting a review on the operation of the Waste Levy. The NSW Auditor General's Report on *Waste Levy and grants for waste infrastructure* (November 2020) was welcome progress however, despite the recent consultation process and the subsequent Issues Paper; we are not aware of any of the recommendations from that Report being enacted.

In conclusion, whilst the Waste Levy may have been a successful incentive for diversion from landfill in the past, the lack of strategic investment in the waste sector over many years, and the absence of strategic planning for waste, have resulted in there being a limit to its continued effectiveness. The levy has reached a point of diminishing returns, and is only increasing costs to councils and ratepayers, because there is a limit on the alternatives to landfill. Only strategic planning, infrastructure delivery and substantially increased reinvestment of the Waste Levy will improve this situation.

Please note that although Member Councils have provided information for this submission, it has not yet been endorsed at a formal meeting of SSROC. I will contact you should any issues arise as a result.

Thank you for this opportunity to contribute to the discussion. For any enquiries, please contact me by email: ssroc@ssroc.nsw.gov.au, or 02 8396 3800.



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