Submission 21

GCC Response to Draft Waste Action Plan

Glenorchy City Council welcomes the State Government’s commitment to supporting improvements to waste management and providing leadership at a state level. This shows a willingness to implement legislation and support important initiatives. We need a statewide approach that provides a consistent and effective system for all Tasmanians to combat the challenges of dealing with waste.

The initiatives in the Draft Waste Action Plan highlight key areas and targets where Tasmania can take a strategic approach to waste management. Council needs detail on how the plan will be delivered and supports the requirement for more work on the policy and strategy that underpins the action plan.

Council offers to work with State Government to share our waste management expertise and discuss how the plan can be developed to best meet the needs of our community.

The Glenorchy community are committed to minimising waste and conserving our resources for the future. The goals of our waste management strategy are:

1. To promote the sustainable management of resources
2. To provide convenient and affordable waste services that meet the needs of the community
3. To minimise negative impacts of waste on the natural and built environments

In particular, one of the actions under goal one is to collaborate with others regionally and participate in nationally initiatives. While the initiatives put forward in the action plan are bold and follow the trends seen in other states, we suggest that there needs to be more work at a local and regional level to ensure that we encourage greater collaboration.

Tasmanians need to come together to have a shared vision of waste management and how we deliver services. With limited resources we need to work together to ensure services are equitable and affordable. An example here would be having agreement for common service provision that takes advantage of economies of scale. That no matter where you live that you are afforded the same service for the same price and that by working together, we can provide it for less.

Council would make the following points in relation to the Draft Waste Action Plan:

Circular Economy

Movement towards a circular economy, and promoting and adopting circular economy principles, is supported. Council is already embarking on these principles through the support of reuse and recycling via the recovery shop and the implementation of FOGO that sees organics diverted from landfill and put back into improving soil health.

Governance

The development of a state-wide governance model is supported and has been endorsed by LGAT. Council is concerned that this model does not support service delivery or focus on regional collaboration. A key to providing affordable and equitable service delivery will require entities that support regional initiatives. We would encourage the state-wide structure to prioritise the development of strong regional bodies that deliver services. An example of this is Dulverton Waste Management a joint authority in the north west that provides a range of waste services to the region.
Data, Innovation Networks and Resource Recovery Targets

Standardised data, reporting and targets are welcomed and will allow the performance of our waste services to be measured and benchmarked against best practice. We would caution against having unrealistic targets and while supporting an aspirational vision, targets need to be achievable. We would welcome targets that address issues of concern to our community like affordability and equitable service delivery. Measurement of how our Councils are working together will assist in driving greater collaboration.

In order to achieve the targets for organic waste and recovery from waste streams Councils will need to establish kerbside FOGO (food and garden waste) services. The universal provision of this service would be more easily established if it were mandated through legislation. It is recommended that State Government adopt this as a priority.

Infrastructure Planning

The development of a Waste and Resource Recovery Plan is supported and will assist in delivering state and regional facilities that benefit from economies of scale. Regional facilities to manage waste from organics, construction and demolition, and commercial and industrial waste are needed now. Council would welcome immediate investment by the State Government into these facilities.

The southern region welcomes investment in the Derwent Park Waste Transfer Station. Positioned strategically in an industrial area adjacent to key transport links this facility could be expanded to accept domestic waste as well as establish downstream processing as part of the development of the circular economy. The recent SKM Recycling issues at the site adjacent to the waste transfer station have highlighted the need for more investment in regional facilities. Council requests immediate funding to help develop a business case for infrastructure planning at this site.

Support Resource Recovery Across Industry

Council would welcome initiatives that provide industry with capital to develop projects and enable business creation. Access to loans, grants, land, and other resources from State Government would drive private investment and growth.

Education and Community Engagement

Glenorchy City Council continues to run an award-winning education program and invests in school education programs. Council aims to provide education to all primary school aged children within the municipality. Our recent education and communication strategy “waste starts with u” (www.wastestartswithu.com.au) has commenced. We would welcome investment and an expansion of this program at a state level to provide consistent messaging to Tasmanians.

Infrastructure and services alone will not manage the challenges of waste management. In order to provide outcomes like a clean and healthy Tasmania and affordable services we need to have all Tasmanians working together and doing their bit. Significant and ongoing investment is required in education around littering, contamination reduction, and improvement to recycling and reuse.
State and National Policy and Regulatory Settings

Council has advocated for a legislated levy on landfill waste and currently has a $2 per tonne levy in place that is used to fund our education programs. Council supports the introduction of a levy that is invested back into the provision of equitable and affordable waste services.

A levy of $10 per tonne would be sufficient to fund statewide governance and put $1m back into supporting regional initiatives. It would increase the cost of landfills and make recycling options more attractive.

Increasing a levy beyond $10 per tonne would need further justification and understanding of the impacts on the community. Affordability is a key issue for the community and making waste expensive to fund other government services is not supported. It is noted that where levies in other states are significantly higher ($65 to $140 per tonne) that only a small proportion (10-50%) goes back into improving the affordability of services.

Increasing the cost of waste disposal will have adverse impacts such as more illegal dumping. Council would not support this or other consequences that shift costs and negative outcomes back onto the community.

The Container Refund Scheme (CRS) while supported is not an immediate priority for our community and the time frame for implementation needs to be reconsidered. While Council supports initiatives that reduce littering and improve recycling and reuse, this needs to be undertaken in a planned and cost-effective way. The cost of a CRS is not identified in the Draft Waste Action Plan but is likely to cost the community in excess of $10m a year.

Council would recommend that the State Government reconsider the implementation of a CRS by 2022. A business case should be developed considering the benefits and costs of the service including further engagement with the community.

The SKM Recycling issue and the ban of recyclable imports into China reinforces the need to think about how Tasmania manages its waste. A focus of investment in downstream processing and the circular economy as well as a focus on the main waste streams (organics, construction and demolition, and commercial and industrial) should be prioritised ahead of a CRS.
30 September 2019

Dear Sir/Madam,

RESPONSE TO THE TASMANIAN DRAFT WASTE ACTION PLAN

Devonport City Council’s current waste activities are guided by the City’s Waste Strategy 2018-2023 and complement the work of the Cradle Coast Waste Management Group (CCWMG).

Council supports the intention and overall direction of the Draft Waste Action Plan (WAP) and have submitted our views in addition to endorsing the Dulverton Waste Management submission on behalf of the CCWMG and the submission by the Local Government Association of Tasmania (LGAT).

Council provides the following comments on the seven focus areas of the WAP.

1. Moving to a Circular Economy
   Council supports the shift to a Circular Economy, exploring opportunities for reducing waste and developing resource recovery but feel further investigation is required to understand how a move is proposed.

2. Governance
   Council strongly supports the recommendations (specifically Recommendations 2 and 4) of the Tasmanian Statewide Waste Management Arrangement Feasibility Study commissioned by LGAT, relating to the purpose, role, governance structure and functions of a proposed statewide arrangement, whereby delivery is led by a partnership between state and local government.

3. Data, Innovation Networks and Resource Recovery Targets
   A comprehensive standardised statewide data set is required to establish and report against targets, with enough resources required for data collection, monitoring and analysis.

4. Infrastructure Planning
   Any planned infrastructure improvements need to consider downstream processing opportunities and market interventions, supported by State investment.
5. **Support Resource Recovery across Industry**

Council’s waste management activities largely focus on domestic waste. Improved systems, infrastructure, and investment should be developed to support industry and business resource recovery, specifically construction and demolition waste. Local markets should also be developed to reuse and recycle waste.

A strong focus should be placed on increasing the diversion of organic waste, including targeting entities in the commercial sector which produce the highest rates of organic waste.

6. **Education and Community Education**

Improving waste literacy across all sectors is a high priority in order to meet draft WAP targets. Council would like to see more specific education actions. For example:

- Increase investment in school-based education (ties to curriculum) and early learning centres.
- Deliver education initiatives tied with incentives to avoid/reduce waste (for instance by supporting local governments to introduce weight-base charging mechanism on kerbside waste)

7. **State and National Policy and Regulation**

Regarding the proposed state waste levy, it is essential that the levy is 100% hypothecated to deliver waste management, resource recovery and education initiatives. A levy should also be appropriately designed so that there are no unintended negative outcomes. For instance, current waste levy schemes in QLD, NSW, Vic, SA, WA and ACT have led to undesirable consequences such as variances in landfill levies across states results in substantial interstate movement of waste. In this case it is important to ensure that any waste and recycling system does not become fixated on levy avoidance. In design of a waste levy, it will be essential to review learnings from other states and territories.

Council supports an appropriately planned and timed Container Refund Scheme based on analysis of successes and failures from other States and understanding of the Tasmanian context and markets.

**Other Comments**

Council encourages the State to address the safe disposal of hazardous waste.

In addition, consideration of options to support and apply smart technologies across the material recovery chain from collection and processing to recovery; extending to smart data collection.

Thank you for the opportunity provide comment on the Draft WAP. Council eagerly awaits the development of a final plan that reflects the waste priorities across the entire community.

Yours sincerely

[Signature]

Matthew Atkins
ACTING GENERAL MANAGER

Enquiry Officer: Carol Bryant
Direct Line: [Redacted]
4 October 2019

Policy and Business Branch, DPIPWE
GPO Box 1550
Hobart Tasmania 7001

Dear Sir/Madam

Feedback on Tasmanian Government’s Draft Waste Action Plan

Thank you for the opportunity to provide feedback on the State Government’s draft Waste Action Plan (the plan).

Our main feedback to Government on the draft plan is to consider the adoption of a modern electronic waste tracking system during the life of the plan.

The plan outlines some key actions and targets, many of which are geared towards better management of solid wastes. As the State’s water corporation responsible for delivery of water and sewerage services, we are naturally most interested in better management of liquid wastes.

We are currently working on a number of fronts to reduce the amount of liquid organic waste discharged into our sewerage system, and working with trade waste customers to manage our risk whilst continuing to provide them with an affordable service. There are opportunities to move to a circular economy around these potentially valuable organic waste streams. Better tracking of wastes will need to be part of the solution going forward if we are going to succeed.

The draft plan states that a number of regulations will be revised during the life of the plan, including the Environmental Management and Pollution Control (Controlled Waste Tracking) Regulations 2010. I understand that these regulations originally outlined a requirement for a waste tracking system to be introduced, but that an exemption from this requirement was later gazetted, and that exemption is still in place.

We believe that the draft plan will benefit from the introduction of a waste tracking system in a number of areas, including improving data on wastes to enable evidence based decision making. We note that the Victorian EPA is in the process of implementing an electronic waste tracking system.

Our main point of contact for this feedback is Royce Aldred who can be contacted on or .

Yours sincerely

Bennie Smith
General Manager Service Delivery
Submission 24

4 October 2019

Policy and Business Branch
Department of Primary Industries, Parks, Water and Environment
GPO Box 1550
HOBART TAS 7001

Dear Sir or Madam

TASMANIAN DRAFT WASTE ACTION PLAN

I refer to the public release of the abovementioned document and the request for comment. Kingborough Council has received the following comments from Kingborough Waste Services (a company wholly owned by Council) and these are forwarded for your further consideration.

1. What are the key opportunities for reducing waste, developing our resource recovery industry and shifting to a Circular Economy?
   - Increased stewardship schemes.
   - A local (southern Tasmanian) food organics processing or composting facility.
   - Developing Tasmanian based industries that produce products from locally sourced recycled materials.

2. What are the primary waste management and resource recovery roles and responsibilities of governments, industry and the wider community?
   - Set in place pricing mechanisms based on values that accurately capture the real costs of managing waste materials (including the proposed waste levy).
   - Governments create the market conditions for recycling to be both environmentally and financially viable.
   - Funding industry development and increased community participation through the levy.
   - Increase public place recycling.

3. What are your key data and information needs on waste and resource recovery?
   - Undertake detailed market assessment and development planning to understand where and what the long term sustainable end use markets are.
   - Benchmarking data to create accurate and current data for potential investors.
   - Setting targets to drive incremental improvements in waste reduction and resource recovery within industry and the community (based on a comprehensive understanding of the waste stream).
4. How can we best use existing research and innovation networks, or establish new networks, to help address our waste and resource recovery challenges?
   - Assess and identify infrastructure needs and logistics to determine where and what the investment requirements are.

5. What are your views and suggestions on the targets presented above?
   - They need to be similar targets to the 2025 national packaging waste targets.

6. Which waste streams would provide the best opportunities to make some early progress on the proposed targets?
   - Food and Organics
   - Energy from Waste
   - Glass

7. What do you consider are the highest priority infrastructure requirements for waste management and resource recovery in Tasmania?
   - A local (southern Tasmanian) food organics processing or composting facility.
   - Viable and fully functioning materials recycling facilities in regional areas.

8. How can governments, businesses and the community best support the development of the resource recovery industry in Tasmania?
   - All levels of government commit to the purchasing of recycled, remanufactured materials and goods in procurement policies to support the business case for investment.
   - Government and industry commit to making available and supplying feedstock (quality and quantity) for new developments to support the business case for investment.

9. Are you aware of any existing education materials that could be adapted for the Tasmanian context? (Please provide examples).
   - Cool Australia [https://www.coolaustralia.org/](https://www.coolaustralia.org/)

10. General Comments
   - It is critical that an appropriate governance structure is in place to manage the expenditure of the waste levy. There needs to be a level of independence and have decisions being made by those that have the expertise in waste management to do so.
   - The levy should be substantial enough to ensure there are sufficient funds to support some major projects. Funds should be spent in a strategic and well-thought out manner. The market for waste products needs to be well understood prior to any expenditure on infrastructure. Making the right decisions on what infrastructure is needed will be very important.
Given the levy will only be introduced in 2021, there is now an urgent need to analyse the actual probability of achieving the waste reduction targets for 2025 as set in the Waste Action Plan. This is a relatively short period of time to establish the governance framework for the administration of the levy. The levy revenue should be independent from the State Government’s consolidated revenue, with all funds directly returned to waste management associated initiatives. How the revenue is split between state and local government’s needs should be carefully considered, with the bulk made available through funding programs that best achieve the desired strategic outcomes.

It is not made clear in the draft Plan how Tasmania can achieve 100% of packaging to be reusable, recyclable or compostable by 2025. This may be an ambitious target as it would involve the adoption of government regulation/policy and industry changes to prevent the procurement and import to Tasmania of these products. It also seems that this target should be coupled with a target to work at the national level and with local government and businesses in Tasmania to phase out problematic and unnecessary plastics by 2030(?).

While the Action Plan looks to NSW and SA levy funded programs as examples, it is also recommended that the government investigate the regional approach Victoria has taken – through regional groups, regional infrastructure planning and joint approaches in establishing product specifications and markets.

The draft Waste Action Plan is a very positive document and Council looks forward to the next phase of its implementation in the near future.

Yours sincerely

GARY ARNOLD
GENERAL MANAGER
2 October 2019

Policy and Business Branch
DPIPWE
GPO Box 1550
Hobart 7001

RE: Draft Waste Action Plan

Thank you for the opportunity to provide comment on the draft waste action plan, Council generally supports the plan and the proposed initiatives to increase resource recovery. The following comments are made in relation to the seven Focus Areas:

1. Moving to a Circular Economy: Government Priority and Key Sectors

   - Government Agencies and Local Government must provide leadership and promote the re-use of materials by requiring that recycled materials are included in tender specifications.
   - Better regulation of tyre retailers is required to ensure that used tyres are genuinely re-used and not just dumped in agricultural areas for a range of dubious uses.
   - Greater involvement of retailers in product stewardship schemes is required, particularly for e-waste and whitegoods.
   - Establish a legislative and administrative structure to support trialling of organics recycling, particularly for land application. Sorell Council has been working with Tasmanian aquaculture businesses who are conducting a trial using salmon and other waste products from aquaculture as a land based fertiliser.
   - Provide support for local community organics recycling projects such as those used in community gardens.

2. Governance

   - The proposed waste levy is supported but the levy funds should go directly to a new waste entity as per the proposed waste management arrangement and not paid to the EPA or other State Government agencies for distribution. The new entity should have suitable governance arrangements and stakeholder representation to ensure that it delivers outcomes consistent with the Waste Action Plan.
   - Clear guidelines must be established on what the levy funds can be used for, such as education, innovation and research and development to enhance resource recovery.
   - Page 8 – paragraph 4, using the levy to clean up old landfills is not an appropriate use of levy revenue.
   - State-wide waste education is required, co-ordinated initiatives are more efficient and provide a clear consistent message.
3. Data, Innovation Networks and Resource Recovery Targets

- Recycling businesses need to provide statistics on what is being recycled, where it is being sent and what it is being used for. Tasmania should be able to provide reports similar to the Victorian Recycling Industry Annual Waste Services Report (Sustainability Victoria).
- Better information on waste volumes going to landfill is required but this will be difficult for smaller Councils with landfills or transfer stations that don’t have weigh bridges.
- Establishing targets for diverting organics away from landfill is supported. However, without data on the existing amounts of organics going to landfill it is difficult to comment on how realistic it is to reduce these levels. Achieving targets will be highly reliant on the establishment of markets for organics. The proposed action should also include the sustainable re-use of the organics not just diversion.
- Research and development initiatives that enable products to be recycled and reused in Tasmania and avoid the need for these goods to be transported nationally or internationally is highly desirable.
- How is it possible to ensure that 100% of packaging is reusable, recyclable or compostable by 2025? How will this work with imported goods? The goal is commendable but more detail on how practical this is will be required.
- Littering enforcement is very labour intensive and many smaller Councils have limited resources for enforcement. The goal of having the lowest littering rates in Australia is admirable but in order to achieve this significant investment in education and governance must occur.

4. Infrastructure Planning

- There are opportunities for Councils to establish regional authorities and negotiate long term contracts with industry, thus enabling organics recycling infrastructure to be built.
- The waste management infrastructure plan should establish priorities for regionally significant infrastructure and encourage Councils to share infrastructure such as transfer stations. Currently, larger city Councils are able to provide more comprehensive services than smaller regional/rural Councils. The small transfer stations often aren’t cost effective and must be significantly subsidised.
- Investigations are required to determine infrastructure requirements to support organics recycling and reuse. If new composting facilities are required, they need to be located appropriately and meet environmental standards. Some Greater Hobart Councils are already progressing this issue and hopefully the outcomes will also be in the best interests of regional Councils.
- The development of organic waste resource recovery strategy is supported.
- Diversion of waste at its source, such as construction and demolition waste is far more desirable and efficient that sorting these materials at transfer stations.

5. Support Resource Recovery across Industry

- Local and State Government need to provide leadership to help create markets for local recycled products, an example would be to specify that a percentage of recycled materials are included in road construction projects.
6. **Education and Community Engagement**

- Coordinated and consistent waste education is required and the proposed levy and waste management arrangement will facilitate this.
- Support local government and industry to conduct composition surveys of domestic garbage and provide reports that can be used to educate the community.
- Support the community (consumers) to lobby business to reduce plastic packaging.
- Use data collected from recycling businesses to provide targeted education to reduce contamination and improve commitment to recycling.
- The recent demise of SKM Recycling and the overall practices of recycling businesses shipping recycling overseas has damaged the image of the recycling industry. In order to achieve the goals of the Waste Action Plan the community must have faith in the recycling industry. Better data/information on recycling practices will help to re-build trust.
- Councils’ often receive enquiries on where their recycling is going, unfortunately there is very little independent publicly available information.

7. **State and National Policy and Regulatory Settings**

- A container deposit scheme requires a large amount of capital investment, is the investment justifiable for the overall benefit? Recycling rates will likely improve in city areas where infrastructure is more cost effective but the increases may not be as significant in regional areas.

If you require any further information please contact Greg Robertson on (03) or @sorell.tas.gov.au.

Yours sincerely,

Kerry Vincent
MAYOR
Response to Draft Waste Action Plan

3 October 2019

Submitted by:
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Executive Summary

Mornington Park Waste Transfer Station (MPWTS) is a 100% privately owned waste management and resource recovery facility located in the City of Clarence.

MPWTS has a vision to be the Southern Regional Hub for Waste Management and be recognised as a leader in waste minimisation innovation. We are active in the collection and transfer, sorting, recycling, and reuse of waste prior to final disposal of waste that cannot be recycled or reused into landfill – we do not own or operate a landfill site.

Our response to the Draft Waste Action Plan has been structured to provide an overview of MPWTS, our perspectives on the waste industry, and our views on the questions raised within the Draft Waste Action Plan. We consider that a shift to the circular economy will be influenced by -

- the landfill price;
- the level of the waste levy;
- the point at which the waste levy is collected to maximise investment, education, and statewide management;
- the proportion of funds which are reinvested to industry as a result of reforms discussed by the draft State Waste Action Plan;
- the level of community education; and
- legislation to drive purchase of recycled content.

We believe that partnership-based approaches will deliver smart and sound collaborative solutions to divert waste from landfill for the benefit of Tasmania’s circular economy.

We also know that appropriately scaled investments will be required to ensure that Tasmania can recycle and/or repurpose the products that most make sense for the volumes present. The business case for each waste stream to enter a circular economy or to achieve diversion from landfill must be viable - a waste levy will assist in achieving this.

Tasmania needs to be realistic about what it is working to achieve and introduce a waste levy that can deliver the change required. We believe that the solid waste levy rates applied for regional locations in other state jurisdictions should be considered for adoption. We believe that levies should be harmonised across Local Government jurisdictions and set to achieve the objective of making the alternatives to disposal of waste at landfill more economically attractive on average.

The introduction of the Container Refund Scheme should occur concurrently to the introduction of the waste levy, as it is a positive move which can limit some of the impact the community may feel towards the introduction of a statewide waste levy.

Tasmania cannot afford to adopt a circular economy approach which directs most waste levies into governance and administration in the first instance, leaving less funds available for industry development, market development, and education. Nor can it afford an approach which captures levy funds and struggles to find the right instrument to distribute fairly to industry or the community.

A balance needs to be found between the appropriateness of the waste levy and the ability to meet community expectations for the responsible management of waste whilst ensuring that investment for the benefit of all Tasmanians occurs.

Most of the waste in Tasmania moves through a gate somewhere – a transfer station, recycling collection point, or a landfill site. Applying the waste levy at the point where waste diversion occurs provides increased incentive to divert waste away from landfill and keep products within the circular economy for as long as possible.
- It provides opportunities for waste management/resource recovery centres (including those owned by Local Government) to invest in initiatives, innovation, and value-based partnerships to improve diversion activities across Tasmania.

- It also employs more Tasmanians and builds their capability through the deployment of new technologies.

- It ensures that Tasmania’s circular economy needs are addressed on the ground where it matters most to Tasmanians.

We support the introduction of a State Waste Levy that is accompanied by a Landfill Gate Fee paid by the entity moving residual waste to landfill as illustrated in Figure 1 below:

Figure 1: The circular economy at work in Tasmania

A state waste levy collected at the transfer station recycling point - in combination with a landfill fee collected at the Landfill Gate for residual waste - ensures that Statewide Management Arrangements can be met, providing both strong governance and investment options for Tasmania’s long-term future.

We also believe that taking two years to develop the implementation arrangements is too long to wait. This effectively means that it is more than two years before any significant funds are directed towards infrastructure and other economic growth development projects for the benefit of the circular economy. Tasmania cannot afford to wait that long.
We welcome the State Government’s initiative to release the Draft Waste Action Plan for comment and would be happy to provide more information to support any of our comments or recommendations should it be required.
Overview

Mornington Park Waste Transfer Station (MPWTS) is a 100% privately owned waste management and resource recovery facility located in the City of Clarence.

MPWTS has a vision to be the Southern Regional Hub for Waste Management and be recognised as a leader in waste minimisation innovation.

Since 2001, MPWTS has been a vital service provider to the southern region, providing critical waste management infrastructure and services to the Municipalities of Clarence, Sorell, and beyond.

MPWTS currently employees more than 20 FTE’s; currently 15% of our workforce are living with a disability. We operate under an Integrated Management System with certification to ISO 9001 (Quality), ISO 14001 (Environmental), and ISO 45001 (Safety) management systems.

MPWTS is active in the collection and transfer, sorting, recycling, and reuse of waste prior to final disposal to landfill of material that cannot be recycled or reused – MPWTS does not own or operate a landfill site.

Waste types handled by MPWTS include:

- general household waste
- commercial & industrial waste
- construction & demolition waste
- green waste
- recyclable/recoverable (including tyres, plasterboard, Drummuster containers, metal, e-waste, engine oils, gas bottles, mattresses, industrial plastics, domestic recycling)
- clean fill
- concrete/rubble
- hydro-blasted excavation material

MPWTS purpose is to economically divert materials from landfill. The site manages this by recovering materials that can be recycled, repurposed (such as into compost) or recovered and sold through the Second Chance Reuse Shop and Building Yard.

Two certified weighbridges record all waste moving into and out of the site, in addition to recording internal transfers of materials across the site.

Understanding the life cycle of materials moving through the site and the potential to increase diversion rates under circular economy principles led MPWTS to enter into a significant research contract with the University of Sydney in 2019. MPWTS has a significant amount of data and looking to take the next steps with insights to support its diversion strategies, increase opportunities for new product development from recovered waste materials, and provide data to stakeholders related to carbon footprint and circular economy performance.

MPWTS takes seriously it’s part in providing education to the community and ratepayers on the responsible handling of waste to strengthen community efforts related to reducing, reusing, and recycling materials. Over the course of the last year, we have received 512 school students from Southern Tasmania on site, providing them with the opportunity to learn more about waste management and handling and to encourage them to recycle at home. We are in the process of entering into an arrangement with the Peter Underwood Centre (University of Tasmania) to continue to develop our learning and education materials and provide more visibility of our activities within the circular economy.
Our perspectives on the waste industry:
The State’s clean green image resonates with many Tasmanians. In an environment where consumption is on the increase and rate of waste per person continues to grow, most Tasmanian’s work to recycle and express opinions on reducing waste (including the use of packaging).

This is supported by the National Waste Report (2018) which indicates that compared to a selection of other developed economies, Australia generates more waste than the average and the proportion it recycles is less than the average.

Many Tasmanians would be disappointed to know that a large proportion of waste materials sorted for recycling are not recycled or repurposed in Tasmania.

Due to Australia’s inability to adequately resource its waste and recycling sector we are now facing circumstances where dry-recyclable materials are moving to landfill due to a lack of capacity and innovative solutions to recycle and/or repurpose. When dry-recyclables are transported, there are questions arising as to the capability and capacity of recyclers to handle the volume of materials they are receiving - particularly in the face of sector failure.

The 2018 Senate Environment and Communications References Committee (Never waste a crisis: the waste and recycling industry in Australia) Report (Senate Enquiry) identified that markets for most recyclables in Australia are unable to absorb the quantity of material collected – as a result unsustainable practices such as stockpiling are occurring (including for glass and soft plastics which are under stress or have failed). This lack of demand is largely influenced by cost considerations relative to the prices for local recovered material on the domestic market – where imported products can be purchased more cheaply than products produced locally using locally recovered materials, there is likely to be a detrimental impact on local demand and therefore the return on investment achieved by recyclers.

Similarly, the 2018 Senate Enquiry found that the financial viability of recycling depends on whether material recovery facilities (like MPWTS) can obtain a better price than the cost of landfill. Market volatility poses problems for recyclables that are recovered – for example, the rise and fall of raw materials associated with recovered steel and aluminium impacts on the price received, just as recovered plastics are affected by the price of crude oil.

Within this context are rising costs of business (fuel, labour, cost of capital) which place pressure on cash flow and investment opportunities.

Add to this the complex environment of local government jurisdictions across Australia implementing waste levy policies that are both inconsistent and insufficient and there is little wonder that Australia’s waste management and resource recovery sector is in crisis with flow on effects being felt in Tasmania.

Tasmania can get this right and introduce a State Waste Action Plan that is the envy of other jurisdictions.

We support Tasmanian Government initiatives that:

- create an income stream to reinvest in business growth and the planning and development of waste management and resource recovery infrastructure and programs that are equitable;
- assist waste management and resource recovery facilities to increase the diversion of material from landfill;
- prioritise waste reduction, recycling, and the circular economy;
- support the phase out of petroleum based single-use plastics;
- create markets for materials with recycled content;
- establish procurement policies supporting the purchase of materials with recycled content; and
• support ongoing communication education and engagement in the face of negative press related to recycling efforts.

Questions specifically raised within the Draft Waste Action Plan

Circular Economy – What do you think?
What are the key opportunities for reducing waste, developing our resource recovery industry, and shifting to a circular economy?

Global material extraction has grown to three times what it was four decades ago – this expansive use in material is largely attributed to the ‘take-make-use-dispose’ form of resource mismanagement which depletes global stocks of finite resources.¹ This poses a threat to the stability of the global economy and ecosystems.

Regulation and policies that attempt to disrupt this paradigm by mandating safe disposal and recycling often fail because of their poor enforcement and application, disparities in regulations between separated jurisdictions, and illegal movements of waste.²

Tasmania needs to take a leadership role and create positive change in the social, environmental, economic, and technical domains of value that a well-informed circular economy can deliver. Key opportunities for reducing waste, developing the resource recovery industry, and creating the shift to a circular economy will be influenced by -

• the landfill price;
• the level of the waste levy;
• the point at which the waste levy is collected to maximise investment, education, and statewide management;
• the proportion of funds which are reinvested to industry as a result of reforms discussed by the draft State Waste Action Plan;
• the level of community education; and
• legislation to drive purchase of recycled content.

Landfill levies need to be consistent across jurisdictions and set at the right level to support diversion from landfill – this is a key fundamental to building the circular economy. They need to be directed towards business-case worthy industry investment and circular economy supply chains as a priority.

For Tasmania, we believe that circular economy supply chains are built on partnerships which ensure that waste is diverted away from landfill and directed towards Australian based reuse, recycling, repurposing, or waste to energy initiatives.

The community needs to see real investment at industry level to support their efforts to reduce, reuse and recycle – we cannot afford to undo years of habit-forming behaviour by reducing confidence in the Tasmanian waste industry’s ability to manage waste away from landfill.

Education campaigns need to -

  o include Tasmanian waste management and resource recovery success stories;
  o be more transparent about the realities of waste to landfill;

continue to support community efforts to recycle right;

promote projects underway; and

build stronger conversations related to the circular economy into the school curriculum.

**Governance: - What do you think?**

What are the primary waste management and resource recovery roles and responsibilities of governments, industry and the wider community?

The Statewide Waste Management Arrangement option recommended within the LGAT Feasibility Study highlights a range of partners for the development of the circular economy. These partners include the Coordinator of the Statewide Waste Management Scheme, Government (including LGAT), Regional Authorities, founding partners (including prominent Tasmanian producers, environmental custodians, and regional anchors and innovators), and Affiliates (such as TyreStewardship).

- Whilst it is assumed that regional anchors and innovators will include existing industry stakeholders and investors, this should be more evident, and their contribution should be appropriately weighted within the management framework and governance framework.

Many industry stakeholders are not part of local government – they work with local government; however local government does not represent their views.

These industry stakeholders have already invested responsibly, and significantly contributed to waste management and resource recovery efforts in Tasmania. They are well connected to affiliates and have developed supply chains in Tasmania and beyond.

Whilst the community (including producers and environmental custodians) are strong advocates for change and contribute to a range of local and regional initiatives, industry stakeholders facilitate a great majority of these initiatives through their activities and supply chains.

The current circular economy partnership model does not recognise this strongly enough.

In addition, the Governance Framework does not identify where industry stakeholders have a role, and this should be more strongly reflected within the Board and Advisory Body structures proposed.

The role of industry stakeholders is particularly important during the establishment of the governance mechanisms, the establishment of the statewide levy and revenue allocation frameworks, and the prioritisation of activities designed to leverage regional momentum related to waste management and resource recovery.

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3 LGAT – Feasibility Study into a Statewide Waste Management Arrangement Part B Report Delivery & implementation study p.ix
4 LGAT – Feasibility Study into a Statewide Waste Management Arrangement Part B Report Delivery & implementation study p.v
Data - What do you think?
What are your key data and information needs on waste and resource recovery?
How can we best use existing research and innovation networks, or establish new networks, to help address our waste and resource recovery challenges?

Experience with waste data in Tasmania and beyond continues to identify that there are variations in the recording of data. Every effort should be made to ensure that data is comparable across Tasmania to ensure that decision making processes are sound.

- In establishing governance mechanisms, it is recommended that a working party of industry stakeholders, local government, and EPA be convened to confirm the key data and information points already in place and identify how this can be improved to ensure data integrity and consistency.

Data – What do you think?

Targets create visibility on the degree of change that the State Waste Action Plan is working to achieve. However, it is worth noting that local government strategies implemented to achieve these targets can influence competition and artificially manipulate the open market leading to unintended consequences.

Investment into waste and resource recovery requires certainty and a solid business case – particularly when research and development may be required to support appropriately scaled initiatives for Tasmania. If local government responses and strategies to the targets proposed influence the volumes and types of waste streams available into the medium to long term, how does industry develop investment ready business cases in the short term?

- It is recommended that the Statewide Management Framework considers how industry plans for investment if there is a degree of sovereign risk associated with local government responses to achieving the waste targets proposed.

Specific responses to the targets identified are noted below.

- **reduce waste generated in Tasmania by 5% per person by 2025 and 10% by 2030;**

  Reducing targets requires an understanding of whether the base line (starting point) is valid, and the reductions are achievable. The working party identified above should be used to confirm the base line for waste reductions targets.

- **ensure 100% of packaging is reusable, recyclable or compostable by 2025;**

  There are several factors that will influence this target, including whether reusable, recyclable, or compostable plastics are compatible with waste management and resource recovery streams in Australia.

  Where local government and/or regional authorities become aware that initiatives for waste reduction, reuse, or recycling are being discussed which will result in changes to public policy, it is recommended that a panel of stakeholders (including industry) should be consulted for their perspective on the ease of adoption of the initiative proposed.
• work at the national level and with local government and businesses in Tasmania to help phase out problematic and unnecessary plastics by 2030.

It is not always easy for industry to meet the expectations of the community – certain types of waste are already difficult to reduce, reuse, or recycle. For example, some compostable packaging is not compatible with plastics suitable for recycling.

The transition period for Australian processors and manufactures using problematic and unnecessary plastics will need to be assessed to see if it is compatible with this target (and the target above).

• achieve a 50% average recovery rate from all waste streams by 2025 and 80% by 2030;

There needs to be greater clarity for the 2025 and 2030 target. How do you determine the average recovery rate from all waste streams? Do all waste streams need to have a 50% average recovery rate or does the target require that the total average is a 50% reduction (with some waste streams having more or less recovery to produce the average)?

• reduce the volume of organic waste sent to landfill by 25% by 2025 and 50% by 2030;

As noted above, reducing targets requires an understanding of whether the baseline (starting point) is valid, and the reductions are achievable. The working party identified above should be used to confirm the baseline for organic waste targets.

What are your views and suggestions on the targets presented above? Which waste streams would provide the best opportunities to make some early progress on the proposed targets?

Community desires for the circular economy could drive a range of initiative at local government level which may not be consistent with the targets proposed within the State Waste Action Plan.

• The State Government should work to ensure that local government targets are consistent with the State Waste Action Plan.

Tasmania needs to be honest about where its waste management and resource recovery trade-offs are so that consensus across all stakeholders can be achieved to support circular economy objectives.

• Research finds that until there is a method for identifying, estimating, evaluating, and trading-off visible and hidden benefits and impacts (positive and negative changes in the social, environmental, economic, and technical domains of value) poorly informed decisions and inappropriate interventions will be made.\(^5\)

• In establishing the waste levy, container refund scheme, and the management framework required, it is strongly recommended that levy funds raised are not consumed by management frameworks.

It is recommended that no less than 50% of levy funds are set aside for industry initiatives to improve supply chain partnerships, introduce new technologies, and

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develop Tasmanian based capabilities (including the qualification and skills required of Tasmanian’s working within the circular economy).

Given current community concerns related to food and organic waste and plastics, it is considered that these waste streams present the best opportunities to make early progress on the waste targets proposed.

Whilst working towards the targets proposed, strategies need to be assessed not only for their economic cost/benefit but also their environmental cost/benefit. The cheapest operator or solution may not be the most beneficial environmentally into the long term.

**Infrastructure Planning – What do you think?**

- What do you consider are the highest priority infrastructure requirements for waste management and resource recovery in Tasmania?

Local government remains a significant stakeholder for planning and managing regional economies as well as community expectations related to waste management and resource recovery infrastructure.

Not every investment will be made by local government, however local government will significantly influence the investments that will be made.

Developing a Waste and Resource Recovery Infrastructure Plan by 2021 makes sense. However current experience for waste management and recycling industry participants is that they are missing from many conversations related to waste and resource recovery at a local government planning level due to their unique position as a service provider to local government.

Infrastructure planning should:

- Be agile - With the development of the Statewide Management Arrangement there is a unique opportunity to integrate agile and responsive processes that are responsive to the action-based expectations of industry and the broader community.

  A collaborative design led thinking activity with a range of stakeholders can assist in facilitating this outcome during management framework design.

- Facilitate the collection and payment of the state waste levy at the waste and recycling recovery center gate (not at landfill) – and provide the capability for this to occur where existing technologies are not in place (including the installation of weighbridges).

- Be focussed on the development of Tasmanian based waste management and resource recovery capacity and capability.

  Where this is not possible due to the type and volume of the waste stream, infrastructure planning should be focussed on supporting supply chain partnerships and solutions.

- Contamination at the source remains a significant risk factor to successful circular economy outcomes. Sustainable volume-based business models are required to make the shift towards a sustainable waste and recycling sector for Tasmania and this cannot be achieved where materials are contaminated and operators are not able to introduce the infrastructure (equipment and people) to sort materials to the standard required for further processing.

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6 2018 Senate Environment and Communications References Committee (Never waste a crisis: the waste and recycling industry in Australia) Report p.138
Smaller regional councils and communities should be provided with additional infrastructure to assist with sorting priority waste streams.

**Resource Recovery – What do you think?**

- How can governments, businesses and the community best support the development of the resource recovery industry in Tasmania?

It has taken Tasmania a long time to reach a point where National and State Policy developments are aligning with community expectation for the responsible management of waste away from landfill.

Collaboration on the circular economy will be critical to maintaining this momentum and maintaining Tasmania’s reputation as a clean, healthy, and sustainable place to live, work, and visit, whilst supporting the clean energy needs of the nation.

Tasmania will need to accelerate and stimulate investment in resource recovery. This will require collaboration and agile ways of working.

- As noted above, we believe that the management framework can be designed to develop capacity across Government to be appropriately agile and build enviable collaborations between government, industry, and the community. This needs to be designed in as the management framework is developed. We strongly recommend that this activity occur.

We support the establishment of a loan scheme for business and local government to accelerate and stimulate investment.

In doing so, we recommend that business case templates be developed to assist industry and local government be agile and collaborative within their responses. In this way, capacity and capability can be built across Tasmania’s range of stakeholders, providing new supply chain solutions in addition to increasing the uptake of technology and industry research.

**Education – What do you think?**

- Are you aware of any existing education materials that could be adapted for the Tasmanian context?

The 2018 Senate Enquiry identified that Australia has grown complacent – in the early years of kerbside recycling there was dedicated energy to educating households on how to recycle properly.7

The recycling industry crisis has not helped the current situation – with many Tasmania’s feeling that their recycling efforts are wasted and feed landfill.

- The Senate Enquiry noted the importance of education programs that highlight the impact that contamination can have on recycling schemes. It is recommended that current education programs be reviewed and reset to emphasise this activity as a platform to improving Australia’s recycling efforts.

In addition to the materials currently available through ReThink Waste, we are aware that several industry stakeholders have developed education materials and host schools and

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7 2018 Senate Environment and Communications References Committee (Never waste a crisis: the waste and recycling industry in Australia) Report p.132, p.138
other stakeholders to support the responsible handling of waste and to support community recycling efforts.

Education will improve through the adoption of a range of solutions which are designed to appeal to the whole community. This includes traditional forms of learning as well as learning supported by new technologies. It is important for Tasmania to tell its story in its entirety (including the landfill journey) to ensure that circular economy efforts are well supported by all Tasmanians.

- It is recommended that a proportion of levy funds be directed to current education providers (including industry stakeholders) to support the renewal of their community education efforts and integrate new technology solutions.
- It is recommended that a series of social science research grants be made available through the University of Tasmania to support the continued improvement of community recycling efforts.

**Policy and Regulation – What do you think?**

MPWTS would like to provide the following additional comments:

**Statewide Waste Levy**

MPWTS supports the Tasmanian Government’s initiative to introduce a Statewide waste levy.

Waste levies already existing in other Australian State jurisdictions to divert waste from landfill and increase resource recovery. Aside from its value as an economic lever to underpin the financial viability of actions that divert waste from landfill, the levy also generates funds for a range of environmental and waste reduction purposes.

Tasmania does not produce significant volumes of waste that would support the type of resource recovery investment that is occurring in other jurisdictions.

- Appropriately scaled investment(s) are required to ensure that Tasmania can recycle and/or repurpose the products that most make sense for the volumes present.
- Where the economic business case supports continued transport for recycling or repurposing to other mainland destinations, the cost/benefit needs to justify transporting relevant materials. Fundamentally companies who conform to the principles of the circular economy vs diversion to landfill need to be supported to do so to remain viable.

This is particularly the case in Tasmania where partnership-based approaches are leading to smart and sound collaborative arrangements focussed on the principles of the circular economy and diverting waste from landfill.

For example:

MPWTS works with Barwicks Landscape Supplies for the shredding of tyres which are then transported to Tyrecycle in Victoria for repurposing.

MPWTS recovers materials from hydrowater through a land-based filtering process (DA approved) that is recovered and converted into high grade topsoil which is sold through supply chain partners.

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8 Government of Western Australia, Department of Water and Environmental Regulation, Consultation paper on proposed amendments to the Waste Avoidance and Resource Recovery Levy Regulations 2008 (May 2019)
Rural, regional, and remote parts of Tasmania will need additional collaborative and partnership-based solutions to waste management and resource recovery activities to achieve community expectations as well as their recycling efforts.

- Whilst there is a desire to create markets for recycled or repurposed products, currently there are limited options available in the Tasmanian marketplace to create enough demand to support investments required (there is only so much compost that Tasmania can absorb). New product development is required to support new market development.

The Draft Waste Action Plan proposes to replace any existing council levies with a new legislated statewide waste levy.

A review of waste and environment levies in other jurisdictions has identified several issues directly related to addressing concerns with the levy system initially established (including levy consistency and exemptions, and local government impacts).

**Consistency and exemptions:**

The *NSW Environmental Protection Authority Review of the NSW Waste and Environment Levy*\(^9\) highlighted that:

- Levies should be set to achieve the objective of making the alternatives to disposal of waste at landfill more economically attractive on average.

- The levy should be applied across the whole jurisdiction the same way (urban and regional locations).

Some states (including Victoria and NSW) provide exemptions for small landfills in regional areas.

Tasmania's population density is much less than other mainland states with many rural, regional, and remote communities utilising waste transfer stations or resource recovery points to move waste away from their area, or utilising a landfill site in their area – all of which incurs cost (to sort and transport) or results in more waste moving into landfill.

The State Government has indicated that all levels of government will need to work closely with industry and the community in an economy-wide effort to support the circular economy\(^10\).

- Government needs to work to ensure that the levy is appropriately set and is consistent across all local government jurisdictions to ensure that unintended and undesirable consequences do not occur.

The 2018 Senate Enquiry found that unintended and undesirable consequences can occur because landfill levies vary across jurisdictions and result in the unnecessary transport of waste to avoid levy costs (such as in NSW and south-east Queensland). In its submission to the Senate Enquiry, the National Waste and Recycling Industry Council (NWRIC) found that this behaviour occurs everywhere there are significant disposal cost distortions\(^11\). The National Waste and Recycling Council and the Senate Enquiry found that inconsistent levies also lead to the potential for fraud created by mislabelled waste and increasing the opportunity for more waste suitable for diversion moving to landfill\(^12\).

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\(^9\) Review of the NSW Waste and Environment Levy, KPMG (June 2012)

\(^10\) Draft Waste Action Plan – Consultation Draft June 2019 p.8


\(^12\) 2018 Senate Environment and Communications References Committee (Never waste a crisis: the waste and recycling industry in Australia) Report pp. 46-47
Mornington Park Waste Transfer Station supports the introduction of a consistent levy across all local government jurisdictions that is sufficiently priced to divert waste from landfill and increases resource recovery.

Local Government levy impacts
Recently the South Australian Government announced a $30 increase in its solid waste levy per tonne for the 2019/20 budget. Whilst this was a positive driver in diverting waste away from landfill, Local Government struggled with the timing and notice of the levy.

In introducing a levy, the State Government should ensure that the levy is set at an appropriate level to drive change and provide enough forward advice for local councils to prepare for this additional cost in their own budget cycles.

It has been found that some regional councils argue that constituents could not afford the levy. Costs of living are felt widely across the community and any increase in rates will gain negative feedback and place some pressure on households.

A social research study completed by Sustainability Victoria across over 450 households found several drivers and barriers to recycling, however these did not include cost. The NSW EPA found that small and medium enterprises considered that their waste bill and recycling costs were relatively low compared to other costs.

The 2018 Senate Report found that harmonising waste levies across jurisdictions helped to reduce negative impacts from the introduction of waste levies. The Report noted that complementary approaches (such as land use planning, education and compliance, regulation and a range of market incentives to recover the resources in ‘waste’ streams) were required.

To support the introduction of levies, NWRIC noted that where landfill levies are applied, they should be stable over the long term.

Based on regional rates, the Tasmanian landfill levy is currently positioned at $5.00. It is considered that this levy rate will not deliver the outcomes stated within the Draft Waste Action Plan (note further below). If the levy is to be positioned at a level significantly lower than other State jurisdictions, it is recommended that an increasing scale over 10 years be introduced to ensure that local government can factor for increases in their long-term budget planning.

- It provides surety to the waste management and resource recovery industry with 10 years viewed as a sufficient period to support investment into the long term.
- Such a period provides certainty and the ability for Local Government to communicate their support for regional development activities which reduce waste moving to landfill.

Mornington Park Waste Transfer Station supports the introduction of a levy that includes an increasing scale over a 10-year period to assist with local government budget and communication processes and provides stability over the long term.

The introduction of a Container Refund Scheme is a positive move which can limit some of the impact the community may feel towards the introduction of a statewide waste levy. This is exemplified through the NSW Government’s Return and Earn Program. Positioning the

References:
13 Review of the NSW Waste and Environment Levy, KPMG (June 2012)
14 Summary of social research on household kerbside service attitudes and behaviours in Victoria, 2014, p.2
15 Social Research on Small to Medium Enterprises (SME) Waste and Recycling, 2016, p.2
16 Government of Western Australia, Department of Water and Environmental Regulation, Consultation paper on proposed amendments to the Waste Avoidance and Resource Recovery Levy Regulations 2008 (May 2019) p.58
18 Feasibility Study into a Statewide Waste Management Arrangement Part A, April 2019, p.14
Return and Earn Program directly in the ‘hands of the consumer’ results in an ability to gain a positive benefit from their efforts to recycle products whilst still feeling that they are contributing to the circular economy and infrastructure development through waste levies.

**Mornington Park Waste Transfer Station supports the introduction of the Container Refund Scheme and its proximity of timing to the introduction of the State Waste Levy to educate consumers and provide incentives to recover resources.**

**Where to collect the Waste Levy**

The Local Government’s Feasibility Study into a Statewide Waste Management Arrangement highlighted the need to explore new solutions tailored to Tasmania’s needs and supported the consideration of circular economy principles as being a natural fit for Tasmania’s circumstances. Adopting these principles is seen to achieve greater resource efficiency across the economy and provide clear benefits to the State which can complement other functions (such as supporting regional development and council led innovations). 19

As noted above, investing in waste management and resource recovery activities in Tasmania will require collaboration, innovative approaches, and new investments. It will not occur without sound business cases which reduce the potential for industry failure.

The Statewide Levy needs to be captured in such a way that it flows through to private enterprise in sufficient volume to bring the circular economy to life, support the right style of on-ground operations and initiatives, and provides an environment where innovation and value-based collaboration can thrive.

Most of the waste in Tasmania moves through a gate somewhere – a transfer station, recycling collection point, or a landfill site.

- Applying the levy at the point where waste diversion occurs provides increased incentive to divert waste away from landfill and keep products within the circular economy for as long as possible.

- It provides a solid principal of equity across the economy for all waste sources, whether generated from general household or commercial and industrial – with everyone contributing to the opportunity to divert waste away from landfill.

- It provides opportunities for waste management/resource recovery centres (including those owned by Local Government) to invest in initiatives, innovation, and value-based partnerships to improve diversion activities across Tasmania. Collection of the waste levy at the gate enables Local Government to also invest in activities designed to divert waste away from landfill.

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19 Feasibility Study into a Statewide Waste Management Arrangement Part A, April 2019, p.15
• Under the model we propose, residual waste moving to landfill attracts a Landfill fee which is paid at the Landfill Gate by the entity moving residual waste to landfill. This is designed to make it more expensive to move recoverable materials directly to landfill and encourages the circular economy.

Failure to capture the waste levy prior to the landfill gate will kill the circular economy.

The National Waste Policy 2018 adopts circular economy approaches as a complement to the continued application of the waste hierarchy. The Feasibility Study recently completed by LGAT indicates that other Australian States are in the process of aligning to the national approach while emphasising functions (market development, sustainable procurement, and other strategies to influence the flow of materials into and throughout their economies) that stimulate their economic development in new and more sustainable directions.20

The Waste Management Industry recognises that there is a lot of debate about what should be done with levy funds raised – unfortunately in some jurisdictions the sheer size of the revenue generated has resulted in a significant portion of the funds collected being directed to consolidated revenue.21

• Tasmania cannot afford to adopt an approach which directs most waste levies into governance and administration, leaving less funds available for industry development, market development, and education. Nor can it afford an approach which captures levy funds and struggles to find the right instrument to distribute fairly to industry.

20 LGAT – Feasibility Study into a Statewide Waste Management Arrangement Part B report Delivery & implementation study p.43
21 Dr Ron Wainberg, MRA Consulting Group, ‘Australian waste levies – something needs to be done’, Inside Waste Aug/Sept 2019 p.27
A balance needs to be found between the appropriateness of the waste levy and the ability to meet community expectations for the responsible management of waste whilst ensuring that investment for the benefit of all Tasmanians occurs.

A fee collected at the Landfill Gate for residual waste ensures that Statewide management arrangements as proposed in the Feasibility Study can be met, providing both strong governance and investment options for Tasmania’s long-term future.

Mornington Park Waste Transfer Station supports the introduction of a State Waste Levy that is collected at the waste management-resource recovery point and supported by a Landfill Gate Fee paid by the entity moving residual waste to landfill.

Waste levy recycling rates and landfill levies
The Draft Waste Action Plan highlights that several Tasmanian councils already have a locally administered levy of $5 per tonne, which some councils have proposed to increase to $7.50 per tonne by 2019/20.\(^22\)

The LGAT Feasibility Study (Part A)\(^23\) identifies the range of landfill levy rates (2018-19) currently in place across State Jurisdictions.

The public fund investment levels from these current levy rates are identified in Table 1 below.

**Table 1: Comparison of strategies, recycling rates, and landfill levies (2018-19)**

<table>
<thead>
<tr>
<th>Timeframe of present strategy / plan</th>
<th>Tasmania proposed</th>
<th>Western Australia</th>
<th>South Australia</th>
<th>Victoria</th>
<th>New South Wales</th>
<th>Queensland</th>
<th>New Zealand</th>
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<tr>
<td>Strategies developed for priority areas</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>Statewide infrastructure and service plan</td>
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<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Data collection, reporting and analytics</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
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<tr>
<td>Governance and collaboration models</td>
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<tr>
<td>Council engagement &amp; procurement support</td>
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<td>✓</td>
<td>✓</td>
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<tr>
<td>Coordinated engagement &amp; education</td>
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<td>Statewide enforcement &amp; prosecution</td>
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<tr>
<td>Market development &amp; sustainable proc.</td>
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<tr>
<td>Coordinated advocacy &amp; policy input</td>
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<td>Product stewardship (including e.g. CDI)</td>
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<td>Infrastructure funding</td>
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</table>

- 2016-17 recycling rates \(^4\)          
  - 49%          
  - 53%          
  - 78%          
  - 68%          
  - 59%          
  - 44%          
  - 28%          

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<tr>
<th>Recycling rate target for strategy endpoint</th>
<th>n/a</th>
<th>75%</th>
<th>70 to 80%</th>
<th>n/a</th>
<th>75%</th>
<th>75%</th>
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<tr>
<td>Generation (t/yr) (2018-19) (^5)</td>
<td>1,837</td>
<td>2,623</td>
<td>2,527</td>
<td>2,106</td>
<td>2,106</td>
<td>2,106</td>
<td>3,002</td>
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<tr>
<td>Metropolitan landfill levy rate (2018-19)(^5)</td>
<td>$5 (current)</td>
<td>$70</td>
<td>$100</td>
<td>$64.30</td>
<td>$111.20</td>
<td>$75</td>
<td>$82.10</td>
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<tr>
<td>Public investment level (adjusted to Tasmanian tonnages)</td>
<td>$1.1 m</td>
<td>$15.9 m</td>
<td>$6.4 m</td>
<td>$6.4 m</td>
<td>$21.4 m</td>
<td>$NZ 4.5 m</td>
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</tbody>
</table>


\(^5\) Tasmanian landfill levy based on regional rates. Queensland landfill levy rate relates to 2015-20 (as proposed), Western Australia landfill levy currently under review.

The current recycling rate across each state jurisdiction identified in Table 1 ranges from 44%-78% with targets for the recycling rate endpoint ranging from 75-90%. This is in the context of landfill levy rates ranging from $64.30 to $141.20 (excluding Tasmania).

- The level of the current Tasmanian (regional) levy is clearly inadequate and will not support the strategies or investments required to reach the targets proposed within the Draft Waste Action Plan.

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\(^22\) Draft Waste Action Plan p.9

\(^23\) LGAT – Feasibility Study into a Statewide Waste Management Arrangement Part A Long Report Needs and Benefits Study p.v
Tasmania needs to be realistic about what it is working to achieve and introduce a waste levy that can deliver the change required.

It is recommended that the solid waste levy rates applied for regional locations in other state jurisdictions be considered for adoption (ranging from $31/tonne to $82.70/tonne)\(^{24}\).

**How do waste levy funds reach industry?**

MPWTS has considered the level of public investment in the context of regional strategies currently administering levy funds. The following example highlights the level of administration costs as a proportion of levy revenue:

- The Northern Tasmanian Waste Management Group (NTWMG)\(^ {25}\) recognises $484,282 in waste levy revenue as at 30\(^{th}\) June 2018.

![Table showing waste management reserve balance](source: NTWMG Annual Report 2017-18)

Program delivery, collection & admin expenditure was $107,868 which is 22% of the 2017/18 annual levy income total.

The NTWMG annual report provides visibility that there is a balance of fees which are yet to be expended and carried over into the waste management reserve (despite program spending occurring during the year).

This example highlights the experience of other State Jurisdictions where surplus funds are generated from waste levy collection and held in reserve until expended through grant programs or directed into consolidated revenue\(^ {26}\).

*Figure 1 Circular Economy At Work In Tasmania*, proposes a model which ensures that waste levy funds are directed towards capability and capacity building, regional infrastructure developments, and economic growth in a timely manner, whilst also providing a mechanism to administer the statewide waste levy concurrently.

**State Waste levy timing**

The Draft Waste Action Plan has recommended introduction of the waste levy by 2021. Recommendation 4 identified by LGAT as part of its consideration on the Statewide Waste Management Arrangement proposes that the LGAT pursue a co-investment funding model.

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\(^{24}\) Dr Ron Wainberg, MRA Consulting Group, ‘Australian waste levies – something needs to be done’, Inside Waste Aug/Sept 2019 p.27  
\(^{25}\) Northern Tasmanian Waste Management Group Annual Report 2017-18, p. 16, p. 22  
\(^{26}\) Dr Ron Wainberg, MRA Consulting Group, ‘Australian waste levies – something needs to be done’, Inside Waste Aug/Sept 2019 p.27
(involving state and local government) to enable the implementation arrangement from 1 July 2020 for a period of two years (to July 2022)\textsuperscript{27}.

- We fundamentally believe that taking two years to develop implementation arrangements is too long to wait. This effectively means that it is more than two years before any significant funds are directed towards infrastructure and other economic growth development projects for the benefit of the circular economy. Tasmania cannot afford to wait that long.

As noted above, if the collection point of the waste levy is moved to the waste transfer/recycling recovery center gate industry can start to initiate regional development projects which would satisfy community expectations for diverting waste away from landfill.

Landfill fees can be used to supplement the development of the Statewide Management Arrangement.

**Closing statement**

As noted in the Overview, MPWTS is a 100% privately owned waste management and resource recovery facility, providing a vital service to the municipality of Clarence and beyond. We have a unique view, built from nearly 20 years of successful operation, and bring the perspective of an industry participant who is already active in the circular economy.

We would be more than happy to expand on any of the points raised, particularly our view on where the waste level should be collected. We look forward to contributing further to the finalisation of the Draft Waste Action Plan.

\textsuperscript{27} LGAT – Feasibility Study into a Statewide Waste Management Arrangement Part B report Delivery & implementation study p.x
Australian Beverages Council
Submission

DRAFT WASTE ACTION PLAN
A scoping paper to review Tasmania’s Draft Waste Action Plan

4 October 2019
About the Australian Beverages Council

The Australian Beverages Council [ABCL] is the leading peak body representing the non-alcoholic beverage industry, and the only dedicated industry representative of its kind in Australia.

The ABCL represents approximately 90 per cent of the industry’s production volume and Member companies are some of Australia’s largest drinks manufacturers. The ABCL also represents many small and medium-sized companies across the country. Collectively, the ABCL’s Members contribute more than $7 billion to the Australian economy and nationally they employ approximately 50,000 people. The industry also pays in excess of $1.2 billion in taxation per annum along its supply chain, and for each and every direct employee in the beverages manufacturing industry, there are 4.9 jobs required elsewhere in the Australian economy to produce and retail the beverages.

The ABCL strives to advance the industry as a whole, as well as successfully representing the range of beverages produced by Members. These include carbonated soft drinks, energy drinks, sports and electrolyte drinks, frozen drinks, bottled and packaged waters, juice and fruit drinks, cordials, iced teas, ready-to-drink coffees, flavoured milk products and flavoured plant milks.

The unified voice of the ABCL offers Members a presence beyond individual representation to promote fairness in the standards, regulations, and policies concerning non-alcoholic beverages. The ABCL plays a role in educating consumers on making informed choices which encourages balance, moderation and common sense.

The ABCL advocates on issues such as portion sizes, environmental sustainability, nutritional labelling, responsible industry marketing and advertising, and canteen guidelines. The ABCL’s Members listen to consumers and adapt their products accordingly by making positive changes and standing by a commitment to promote greater choice, appropriate portions and more low and no kilojoule products.

The ABCL is an important conduit between the non-alcoholic beverage industry and governments, supporting the Australian Government, State/Territory Government and Local Councils.

The ABCL introduced a dedicated juice division, Juice Australia (formerly Fruit Juice Australia), in 2009 and a dedicated water division, the Australasian Bottled Water Institute [ABWI], in 2011.
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Introduction

The ABCL considers environmental responsibility a key issue and important to the long-term viability of the non-alcoholic beverage industry. In discussions with its Members, the ABCL considers the environmental impact on all our public policy, initiatives, industry commitments and other decisions, and it is imperative these discussions are maintained to ensure the long term viability of the non-alcoholic beverage industry.

The ABCL provides important counsel to its Members on environmental issues, including: Container Deposit Schemes [CDS], resource management and environmental sustainability. In 2019, the ABCL launched its Sustainability Working Group to support the work of the industry across multiple areas of Sustainability and encourage real change towards the United Nations Sustainable Development Goals.
The ABCL and Container Deposit Schemes

The ABCL supports efficient, industry-driven initiatives, including CDS.

It is the view of the ABCL that the non-alcoholic beverage industry is best placed to deliver low-cost CDS across Australia which will have the least impact on manufacturers while ensuring consumers are provided with convenient, cost effective and easy-to-use Schemes that benefit the environment by reducing litter and providing a cleaner waste stream to encourage greater recycling.

Over the last three years, the ABCL has been engaged in the successful development of CDS across Australia in multiple jurisdictions and most recently in Queensland with its Container Refund Scheme [CRS] which commenced on 1 November 2018. In its first month of operation, the CRS in Queensland collected more than **50 million containers** and more than $5 million was returned to Queenslanders, community groups and charities.

The ABCL is working closely with the Government of Western Australia on the **2020 commencement** of the CDS to ensure the Scheme’s design and infrastructure are appropriate and to lower financial costs to both industry and consumers. Projections indicate a CDS in WA could result in over 700 million more beverage containers being recycled over the next 20 years, and the number of containers sent to landfill reduced by 5.9 billion. It is against this backdrop that the ABCL supports the Government of Tasmania in its pursuit of a more sustainable future with less litter and greater levels of recycled product throughout the beverage industry via a CDS.
The Australian Beverages Council’s Position

The ABCL is confident that the Tasmanian Government is progressing in a positive approach toward waste management. The ABCL welcomes this action and the opportunity to provide feedback to the Tasmanian Government Draft Waste Action Plan – a signature set of policies which have the potential to transform how Tasmanian interact with waste across the island. The following focus areas are important to note for the benefit of the Waste Action Plan as a whole, but are of particular relevance to the Container Refund Scheme which is scheduled to be implemented in 2022:

1. Use of Recycled Materials

   The ABCL is supportive of the use of recycled materials where possible.

   It is important to note that the availability of recycled materials, such as rPET, is often restricted due to domestic processing infrastructure and/or the preferential cost of virgin material often due to lower production costs caused by lower resource prices for virgin material. Members of the ABCL have expressed a strong desire to use more recycled material in the manufacturing of beverage containers and second and tertiary packaging, but supply constraints and the high cost of recycled material are major obstacles in achieving greater use of recycled content across the country.

2. Use of Renewable Materials

   The ABCL is supportive of the use of renewable materials where possible.

   It is important to note that the availability of renewable materials, particularly those derived from sustainable forests, comprise a small proportion of the containers use by the non-alcoholic beverage industry. Members of the ABCL have expressed a desire for more renewable materials to be available to manufacturers and the ABCL supports innovative ways to incorporate and encourage the use of more renewable materials in the non-alcoholic beverage industry.

3. Eliminate Hazardous Materials

   The ABCL is supportive of eliminating hazardous materials from the beverage supply chain.

   Naturally due to Food Safety Standards, hazardous materials are not used in beverage containers, and in relation to secondary packaging, the majority of the ABCL’s Members do not use hazardous materials or keep these to a minimum.

4. Optimise Material Efficiency

   The ABCL is supportive of optimal materials efficiency.

   Many of the ABCL Members have developed ‘light-weighting’, i.e. using less plastic, strategies to support this goal.
5. Design for Recovery

The ABCL is supportive of packaging that is easy to recover where infrastructure exists. It is important to note that infrastructure to recover materials is not uniform across Australia. The ABCL is an ardent supporter of more domestic manufacturing facilities to process waste, including PET and glass beverage containers.

The ABCL believes there is an opportunity for the Government of Tasmania to explore the feasibility of a Tasmanian processing plant for the island’s PET, glass, aluminium, steel and liquid paperboard containers and one that could support investment from other parts of the country and region. A domestic manufacturing or processing facility in Tasmania could support local employment while encouraging a more sustainable future for Tasmania and, in time, other parts of the Commonwealth.

6. Design for Transport Efficiency

The ABCL is supportive of packaging that is more environmentally friendly and cost efficient to transport. It is important to note that many manufacturers are limited by the requirements of packaging vendors and retailers, for example higher packaging grades for strength in transit. It is important to note that Members of the ABCL have developed ‘light-weighting’ strategies to support transport efficiency. While PET containers have received significant attention in recent months, one of the main benefits to the industry’s use of PET bottlers is the light weight design which reduced haulage costs and environmental impact. If implemented efficiently, a CDS in Tasmania could provide an important clean waste stream and ultimately encourage more environmental friendly packaging by increasing recycled content in PET containers.

7. Design for Accessibility

The ABCL is supportive of greater packaging accessibility and supports easy-to-open/easy-to-read and functional products. The ABCL encourages consideration to the number of mandatory and voluntary labelling changes in recent years and the disproportionate burden these have placed on the non-alcoholic beverages industry. It is the position of the ABCL that labelling changes, caused by a number of independent consultations, should be coordinated and consolidated to reduce the impact on beverage manufacturer, thereby alleviating any unnecessary cost imposts on consumers. Furthermore, the ABCL supports consumer awareness campaigns on sustainability and sustainable packaging, particularly among hard-to-reach groups.

It is important to note that many beverages have limited label space, caused in part by restrictive labelling conditions. Multiple labelling changes in recent years have not only imposed substantial costs on beverage manufacturers, but it has made it challenging to support consumer accessibility, as defined in the SPGs.
The ABCL has consulted with its Members in relation to label changes, including Country of Origin Labelling [CoOL] and mandatory refund marks related to the introduction of CDS across Australia as well as front-of-pack schemes, such as the Health Star Ratting, and necessary changes to sugars labelling as anticipated by the most recent meeting of the Forum on Food Regulation in August 2019.

ABCL Members are supportive of consolidated mandatory and voluntary label changes to ensure manufacturers do not have to undergo costly changes and consumers do not experience regular changes to labelling.

It is important to highlight the substantial costs incurred in making such label changes, including¹:

- **Label design** – the cost of engaging designers to make changes to, or redesign the label (or package for direct print labels);
- **Label production** – the costs associated with the production of labels over and above printing, such as new printing plates;
- **Proofing** – the cost of viewing incorporated text, colour and/or graphical changes to the label, to ensure that the label is how it should be before printing. This may include the testing of new plates;
- **Package redesign** – the costs associated with changing the shape, or size of packaging. The direct costs include packaging redesign costs (including production lines costs) and packaging proofing costs; and
- **Labour** – the labour inputs involved in responding to regulatory changes, such as marketing, management, administration, technical and regulatory expertise.

In Appendix A, the ABCL has estimated current costs for label changes based on credible 2008 calendar year data commissioned by FSANZ in conjunction with PwC, adjusted for inflation over nine years at an average annual inflation rate of 2.2 per cent. The total change over the period 2008 to 2017 is 21.2 per cent.

NB: The estimates provided are intended as a guide, and actual costs may be higher depending on the individual organisation’s scale of operations and other cost structure benchmarks.

The above list of core considerations reinforces the lengthy transition times required for labelling changes, particularly to utilise and deplete the supply of existing label stock that would need to be exhausted (approximately 12-18 months’ supply), in addition to supply chain considerations and agreements that require labels to be manufactured and distributed many months in advance.

The ABCL notes that Canada has allowed for a five-year transition period for its recently mandated labelling changes related to ingredients lists, although an extension to 2022 is being considered². The

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ABCL encourages similar consideration to be given to Member companies in Australia to support sustainable packaging label changes to be implemented gradually across all categories.

The ABCL supports greater consumer awareness of recycling and recyclable packaging among hard-to-reach groups, with particularly consideration given to:

- Remoteness and the distance from metropolitan areas;
- Socioeconomics;
- The summary measure of disadvantage;
- Occupation or industry of occupation;
- Casual employees and shift or night workers;
- Indigenous Australians (Indigenous Status);
- Non-English-speaking background [NESB];
- Income support recipients;
- Barriers to accessing transport, healthcare or similar services; and
- Highest education levels.

8. Design to Reduce Product Waste

The ABCL is supportive of reduced product waste.

The non-alcoholic beverage industry enjoys:

- Low waste levels due to product expiration;
- Low levels of waste product due to damage during handling and retailing;
- Low levels of waste as a result of a range of serving sizes, including recently introduced smaller pack sizes.

9. Design to Minimise Litter

The ABCL is supportive of litter minimisation.

The ABCL supports CDS in addition to kerbside recycling as a way to reduce litter across Australia. Local Government should be encouraged to provide recycling bins in addition to standard waste bins to support the sustainable recycling of beverage containers and other recyclable packaging.

ABCL Members have taken steps to reduce easily separable components and improve the recyclability of existing components.

10. Provide Consumer Information on Sustainability

The ABCL is supportive of greater consumer information and education on sustainability, alongside a collaborative effort to address some key infrastructure concerns.

The ABCL fully supports greater consumer information on sustainability, but this should not be carried out in isolation. Members of the ABCL have expressed concerns over domestic supply of rPET, for example, and the prohibitive cost of recycled material due to the infancy of some infrastructure to support greater levels of recycled content being used in container or packaging manufacturing.
Summary: CDS Objectives & Best Practice

The Australian non-alcoholic beverages industry supports the decision of the Tasmanian Government to develop a Container Refund Scheme. We particularly advocate the development of the scheme toward:

- Reduce beverage container litter by providing an incentive for the Tasmanian community to keep, collect and return beverage containers for a refund;
- Reduce the environmental impact of litter on the natural environment and on wildlife;
- Reduce the costs associated with litter removal for the Tasmanian Government and the community;
- Increase recycling and recovery rates;
- Provide an opportunity for the community to participate in recycling activities and help schools, charities and community groups to generate income; and to
- Increase business and employment opportunities.

The ABCL recognises the role our industry plays in helping to achieve these goals by reducing beverage container litter. Moreover, the non-alcoholic beverages industry supports the environmental goals of increasing the recycling of single-use containers and increasing the collection and reuse of refillable containers.

In general, as best practice, the ABCL supports a plan which is industry-led, with a not-for-profit Scheme Operator, leading to low costs which are transparent and ease of access for customers / recyclers.

Additional detail on these principles follows:

- Common deposit amount, refund mark, barcode requirement, container registrations eg national database;
- Common terms and names (e.g. PRO vs Scheme Coordinator);
- Common set of protocols for matters such as ‘first supply’ and ‘contract bottling’;
- One scheme design with no ‘Network Operator’ layer;
- National pricing, invoicing, auditing, and material sales;
- National scheme brand, with one payment system, using a common brand and interphase for consumers. i.e. one app which allows consumers to return containers and receive their refunds seamlessly in any jurisdiction;
- Facilitate the ability to reap cost savings from having one ‘services company’ operating back of house for IT, finance, invoicing, auditing, contracting, marketing and compliance.
- Finally, the beverages industry has a long history of working collaboratively with a broad range of governments and other stakeholders to reduce litter and increase recycling. The non-alcoholic beverages Industry is pleased to now be liaising with the Tasmanian Government in this venture.
The ABCL and the Tasmanian Government’s CRS

The ABCL believes the Tasmanian Government should consider establishing a CRS Advisory or Steering Committee to design and oversee the progress of the Tasmanian CRS. The ABCL in recent years has had significant involvement in the design and development of container deposit schemes in NSW, the ACT, QLD and now WA.

In closing, the ABCL thanks the Tasmanian Government for the opportunity to make this submission on such an important matter, and we remain available to contribute expertise and resources to the development of the Waste Action Plan going forward.
ABCL Contact

To discuss this submission or any aspect contained therein, please contact:

<table>
<thead>
<tr>
<th>Mr. Mike Skeggs</th>
<th>Mr. Shae Courtney</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Operating Officer</td>
<td>Public Affairs Manager</td>
</tr>
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<td>Australian Beverages Council</td>
<td>Australian Beverages Council</td>
</tr>
<tr>
<td>T: 02 9698 1122</td>
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</tr>
<tr>
<td>E: [redacted]@ausbev.org</td>
<td>E: [redacted]@ausbev.org</td>
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Appendix A: Cost of Label Changes

The ABCL has estimated current costs for label changes based on credible 2008 calendar year data commissioned by FSANZ in conjunction with PwC, adjusted for inflation over nine years at an average annual inflation rate of 2.2 per cent. The total change over the period 2008 to 2017 is 21.2 per cent.

NB: the estimates provided below are intended as a guide and actual costs may be higher depending on the individual organisation’s scale of operations and other cost structure benchmarks.

Cost of Label Changes per SKU

Minor change:

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The Hon. Peter Gutwein MP  
Minister for Environment  
Department of Primary Industries, Water and Environment  
GPO Box  
HOBART TAS 7001  
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4 October 2019  

Dear Minister Gutwein  

Re: Draft Waste Action Plan  

Thank you for the opportunity to provide feedback on the Draft Waste Action Plan. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body for all stakeholders in the essential $14 billion waste and resource recovery (WARR) industry. We have more than 2,000 members across the nation, representing a broad range of business organisations, the three (3) tiers of government, universities, and NGOs.

Our members are involved in a range of important waste management and resource recovery activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residual materials.

WMRR congratulates the Tasmanian government for developing a draft waste action plan that represents a good first step in the jurisdiction’s move towards creating a resilient and sustainable circular economy in Tasmania. WMRR acknowledges the government’s attempt at aligning the draft plan with the National Waste Policy – national consistency and harmonisation should not be understated. However having said that, WMRR believes the current version of the 2018 National Waste Policy that is publicly available requires much greater work in order that it can include targets. WMRR is engaging with government on this and is advising the federal government to include strong targets, among other changes, in the policy. WMRR encourages the Tasmanian government to continue to include and build towards the targets in its draft action plan.

Opportunities abound in Tasmania. In 2017-18, the state sent 459,000 tonnes to landfill and recovered 464,000 tonnes; the value of the sector during that period was $147 million1. By establishing a framework to stimulate the state’s resource recovery industry and by setting ambitious targets to drive resource recovery, Tasmania is setting itself up to grow its essential WARR sector and create jobs as we know that 9.2 jobs are created for every 10,000 tonnes of waste recycled, compared with 2.8 jobs from landfilling2.

Beyond job creation, the World Economic Forum has estimated that a circular economy could add $26 billion to Australia’s economy by 2025, and an additional $9.3 billion to Australian business through a collaborative economy. Thus, Tasmania’s development of a draft waste action plan is not only timely and represents a positive step forward, WMRR believes the plan could have legs as the government has shown an awareness of, and acknowledgment that, WARR is a shared responsibility, the consideration of a product’s full lifecycle is essential, and a whole-of-government approach is required to both develop new and existing end markets. However, the

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2 Deloitte Access Economics.
final draft of the action plan must contain pathways, clear process timeframes, and robust review mechanisms to achieve the government’s actions and objectives within the plan.

WMRR acknowledges and supports Tasmania’s intentions to introduce both a waste levy and container refund scheme (CRS) – the key elements of this action plan - and would urge the Tasmanian government to work closely with industry to deliver these commitments and ensure a smooth implementation process.

The levy is not only a critical feature of the draft action plan, it is one of the tools that will underpin its success. As such, levy design must be developed in close consultation with all stakeholders, including local government, industry, and businesses, and WMRR welcomes an opportunity to engage and work with the government throughout the levy design and implementation process. Tasmania is also in a positive position as it can look to neighbouring jurisdictions that have waste levies to draw insight and learn from their implementation and review processes. Importantly, Tasmania must ensure that the model it develops drives the true objectives of a waste levy and does not end up simply in consolidated revenue as experienced in many of the other levy-paying states.

Turning to governance, WMRR agrees that this is crucial to the successful implementation of the waste action plan. WMRR notes that the government will consult with Local Government Association of Tasmania (LGAT) following the release of its final report into a proposed statutory administrative body to implement waste reform in the state. WMRR’s recommendations are below but we strongly advise the government to support an administrative body that reflects the multiple interests of all stakeholders in the delivery of WARR targets and infrastructure in Tasmania, not just local government.

Finally, the plan briefly mentions the waste hierarchy and it is WMRR’s view that more significance must be placed on the hierarchy, including adding the actual hierarchy in the final plan, as this is what a successful and integrated WARR system is based on (details below). WMRR also encourages the government to shift its thinking – it’s not just about waste, it’s about our resources – and to rename this strategy a Waste and Resources Action Plan.

WMRR’s full submission is attached and we look forward to engaging with the government as it finalises its action plan and designs and implements its much-anticipated levy and CRS. Please do not hesitate to contact the undersigned if you’d like to discuss WMRR’s submission.

Yours sincerely

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Submission

Statewide Waste Levy
WMRR supports the Tasmanian government’s proposal to introduce a waste levy by 2021 as we agree that it is an integral part of a successful waste and resource recovery policy framework. However, a waste levy must be backed by strong policy support; the objectives of a waste levy are well known but while a levy will create a price signal and a revenue stream that must be reinvested in WARR to create infrastructure for remanufacturing, the levy alone will not build a circular economy. Tasmania needs to consider how to develop domestic remanufacturing and markets for recycled materials (more below).

The paper rightly considers the programs in other jurisdictions (NSW and SA being the states the paper has looked at) that currently have a waste levy. However, WMRR believes that while it appears levy-paying states have directed “substantial funds” to addressing WARR issues, these programs have, to date, been inadequate. For instance, it may seem that NSW has a significant grants program, but it is in fact, not reflective of the state’s high landfill levy rate (NSW’s metropolitan levy rate is the highest in the country). The NSW landfill levy may have met one of its objectives – landfill diversion – but it isn’t as successful in achieving its second purpose, to improve resource recovery, because of the so far inadequate reinvestment of levy funds into industry.

Likewise, in SA where the government recently announced without warning a significant mid-year levy increase, the levy is not the driver of a successful WARR industry. The state’s municipal solid waste diversion rate is currently a low 54% and despite a high waste levy, strong policy drivers and initiatives such as FOGO collections and mandated sustainable procurement by government are lacking. The two levy increases in 2019 and 2020 have also been viewed by stakeholders as a revenue boosting exercise by the government with no corresponding increase in investment in the industry.

Thus, WMRR strongly urges the Tasmanian government to engage extensively with all stakeholders, including industry, on the design of its waste levy, and to also look to other jurisdictions (beyond SA and NSW) to compare and review their levy schemes, grants programs, reviews, and implementation processes, and ascertain their suitability to Tasmania and how they drive both local government and industry’s resource recovery ambitions. Members of an equivalent waste levy entity (i.e. board members) should include industry representation. WMRR also does not support using levy revenue to assist councils with legacy issues associated with old refuse sites.

Additionally, WMRR recommends that the Tasmanian government considers the Queensland experience and process. Queensland reintroduced a waste levy on 1 July 2019 and while there are teething issues that need to be resolved, the Queensland government showed a willingness to listen to industry’s concerns and work with the sector throughout the levy implementation process; of note was the government’s decision to provide ample time for industry and councils to make the necessary adjustments and prepare for the levy.

WMRR reiterates that the design and cost of the levy must be developed in close consultation with all stakeholders and that the government engages with WMRR in the preparation of legislation or regulations that will deliver the levy. How the funds raised are directed to resource recovery initiatives is vitally important and WMRR recommends that Tasmania’s infrastructure strategy, which WMRR acknowledges is part of the plan, is closely linked to waste levy reinvestment. Importantly, a funding policy backed by legislation is required to indicate how the revenue collected will be directed to WARR initiatives and how this process, outcomes, and reviews are robust and transparent, and funds should be reinvested through an Innovation Fund.

Container Refund Scheme
WMRR supports Tasmania’s proposal to introduce a container refund scheme (CRS) by 2022 and believes that with almost all jurisdictions either home to a scheme, or about to roll one out (with the exception of Victoria), there is an opportunity for national consistency across all CDS/CRS participating states and territories.
particularly around eligible containers (WMRR supports the expansion of the CDS/CRS to include wine bottles) and the refund amount.

WMRR agrees with the sentiment in the paper that adequate time (nothing less than two years) is necessary to allow for the necessary infrastructure and adjustments to be made. WMRR also agrees that a CRS, while a positive litter reduction scheme, offers a clean stream of recyclable material at high values. However, WMRR cautions against the misguided belief that a CRS will enable Tasmania (or any other jurisdiction for that matter) to meet the more stringent quality limits imposed by global markets. Considering how complex packaging is today, comprising a range of different materials (a plastic water bottle already sits at 10% contamination by weight with its lid and label), there is no chance of Australia ever meeting current contamination limits for export materials.

Thus, Tasmania must consider how to develop markets domestically for the materials it uses, collects, and processes. A CRS will offer a clean stream of beverage containers, which would meet the demand for bottle-to-bottle and food grade recycling and WMRR encourages the Tasmanian government to play a leadership role by creating remanufacturing pull. The paper points to Coca Cola Amatil’s commitment to doubling its use of recycled plastic packaging but it is important that Australian recycled material is used and that these manufacturers do not import recycled material from overseas, because if they do, we will simply have no home for our recycled materials, bringing us back to square one. Thus, WMRR urges Tasmania to work with the other jurisdictions to create this remanufacturing pull, by demanding that manufacturers commit to using a percentage of domestic recycled materials in their products.

Similar to the waste levy approach, WMRR encourages the Tasmanian government to learn from the lessons of the other jurisdictions that have rolled out (or are about to implement) a CRS. NSW is a particularly positive example to follow – its scheme continues to meet and exceed all targets and objectives – one that offers the widest network coverage to the community; WMRR cannot stress enough the importance of community participation to ensure the scheme’s success and for community to participate, a widespread network of access points is needed, as well as the fact that the WARR industry has the same objectives as government, including developing a highly accessible scheme that enables easy access to the community for gaining redemptions - this is arguably at odds with the beverage industry that prefers a low cost, low return scheme.

The following metrics were proposed for WA and could assist in determining the minimum number of redemption points in Tasmania, taking into consideration the state’s unique challenges and landscape:

- Metropolitan areas and major regional centres: one refund point per 20,000 people within a five-kilometer radius.
- Regional areas: one refund point per town of 2,000 people, with an additional refund point for every additional 10,000 residents, within a 30-kilometre radius.
- Remote areas: one refund point per town of 500 people within a 50-kilometre radius and for very remote areas, within a 100-kilometre radius.

WMRR looks forward to engaging with the government as it develops its CRS paper, legislation, and implementation process to build a best practice CRS for Tasmania.

**Waste Reduction and Resource Recovery Targets**

WMRR supports the targets set in the draft action plan and note that they are aligned to those that were originally in the National Waste Policy – as mentioned above, the National Waste Policy that is publicly available currently does not include these targets. WMRR is continuing to engage with the federal government on the National Waste Policy and encourages the latter, as well as all state and territory government to work together with local governments to achieve these targets.
WMRR suggests that the Tasmanian government reviews its data as waste and resource recovery activity improves and evolves, and new market opportunities as well as technologies arise. As these are data-based targets, the government should consider rolling out a waste tracking and reporting system.

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<thead>
<tr>
<th>Focus areas and actions</th>
<th>WMRR’s response</th>
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<tbody>
<tr>
<td>1. Moving to a circular economy</td>
<td>WMRR agrees with much of the Tasmanian draft waste strategy’s circular economy discussion and the government’s awareness that a circular economy does not use a traditional linear model (“take, make, dispose”) but instead, aims to maximise the value and use of materials and resources at every stage of a product’s lifecycle. WMRR suggests including a clear and concise circular economy definition in the action plan and proposes the Ellen MacArthur Foundation’s definition be adopted: “A circular economy is based on the principles of designing out waste and pollution, keeping products and materials in use, and regenerating natural systems.” In order to build a successful circular economy, we must value resources and endeavour to avoid and reduce waste as our first priority, and then understand that in a thriving waste and resource recovery system, there is no single process that is capable of managing all of our residual waste, be it organics, glass, paper, cardboard, packaging, bulky waste, or MSW, on its own. It is about building and strengthening a functional and integrated system based on the waste hierarchy, where each action does not compete with or cannibalise the other but collectively, all processes play a vital role in driving positive diversion and recovery outcomes. WMRR urges the Tasmanian government to articulate this systems-based approach in its final action plan as a means to provide clarity and communicate how the essential WARR industry can and should function successfully now and into the future. WMRR agrees with the government priorities and industry sectors detailed in the draft plan that could provide opportunities for reducing waste generation and boosting related business and employment opportunities. However, further thought to the priorities and suitability of industry sectors should be given; consideration should be also be given to major industry, retail, councils, domestic manufacturing and remanufacturing, cleaner production, public communication and education campaigns, and more.</td>
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<tr>
<td>2. Governance</td>
<td>WMRR agrees that the waste levy will require the establishment of an administrative structure. However, LGAT’s Feasibility Study into a Statewide Waste Management Arrangement, which the Tasmanian government has indicated as an “important contribution” to the government’s deliberation on governance,</td>
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requirements, is highly problematic and does not have WMRR’s support.

For one, the WARR industry has been completely left out of the proposed governance mechanism; the report highlights the Premier’s Local Government Council (PLGC) as an example of a governance mechanism for the Statewide Waste Management Arrangement between state and local government, which excludes the WARR industry. This is despite advisory bodies previously identifying areas that industry should and could participate in.

It is WMRR’s opinion that the options reviewed and reported on in the study are not based on current, best practice (domestic and global) operating models for governance of WARR between state and local government, and industry. As such, the report is simply a theoretical assessment and not a comparison of functioning models that are presently delivering reform and improved management.

Any administrative structure/waste management arrangement must not be captive of only one level of government, or solely of councils, or just industry. WARR is not only a shared responsibility that requires the collaboration and engagement of stakeholders across the supply chain, this agency must encompass skills-based leadership and comprise a Board that both understands and reflects the complexity of, as well as deep community interest in, this essential sector.

WMRR strongly recommends that the final administrative body is one that reflects the multiple interests of stakeholders in the delivery of WARR targets and infrastructure in Tasmania. The creation of an innovative and energetic WARR authority in Tasmania would be a real boost to the island economy and WMRR recommends close consultation with industry and other stakeholders prior to the finalisation of the legislation which will create a new waste and resource recovery authority.

### 3. Data, targets, and innovation networks

WMRR supports the establishment of standardised data management systems to capture waste data, monitor progress against targets, and facilitate business investment in resource recovery. It is vital that the Tasmanian government collects and makes available baseline data before the action plan is finalised and rolled out in order for the state to measure and track its progress and achievement of milestones. Further details are required around how the government intends to progress data collection and management. For instance, does the government intend to roll out a waste tracking system and what are the viable ways the waste levy can be used to determine resource recovery performance?
Broadly, data collection across Australia requires a significant overhaul. At the moment, a large amount of data appears to be neither robust nor does it monitor all relevant parts of the waste and resource recovery sector, making it increasingly challenging to make evidence-based decisions. The exception to this, in part, is NSW, which recently published the most accurate and robust data to date, largely due to its mandatory weighbridge requirements. However, a great part of the supply chain, i.e. the materials that are actually recycled including new products and destinations, remains unknown. It is important to note that landfill diversion alone is neither a sufficient nor accurate measure of how well we are managing our waste as diversion does not equate to recycling or resource recovery. These are considerations that the Tasmanian government should focus on in developing its waste data capturing and monitoring system, as well as the necessary performance metrics. It is in a good position to consider the data shortcomings of the other jurisdictions, learn from their journeys, and contemplate the data the state requires as Australia, and the rest of the developed world, goes through a structural change in the way we manage our waste and resources.

Finally, WMRR recommends that the targets set out in the action plan are regularly reviewed – with timeframes set – as both data improves, and new market and technology opportunities arise.

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<th>4. Infrastructure planning</th>
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WMRR agrees that Tasmania must understand its existing capacity as well as waste trends and streams in order to facilitate business investment. Against the backdrop of the waste hierarchy and following an infrastructure needs analysis that projects current and future needs (and WARR goals) based on material streams, the Tasmanian government must develop an infrastructure strategy that is linked to the waste levy and this action plan. Thus, WMRR supports the government’s commitment to develop a Tasmanian Waste and Resource Recovery Infrastructure Plan by 2021.

Waste and resource recovery is an essential service and must be recognised as such, with WARR infrastructure consistently being considered a key part of the strategic planning needs of the state, as well as all development application processes; certainty of locations and appropriate buffer zones are key requirements.

WMRR encourages collaboration and engagement with local government to address potential planning issues around WARR infrastructure and this process should include input from the industry as it is the latter that will play a major role in building and investing in the infrastructure required. Industry needs state and local government support, as well as the right signals to invest with certainty.
| 5. Support for the resource recovery industry | WMRR welcomes the plan’s support for new and existing waste and recycling enterprises. These businesses could receive support in the short-term through existing government business development and support programs, and in the longer-term through the waste levy.

WMRR also supports the proposed actions in this section and agrees with, as well as looks forward to, engaging on the development of an Organic Waste and Resource Recovery Strategy by the end of 2020, and a Tasmanian Market Development Study by the end of 2021. WMRR is calling on the government to provide further details on its proposed loan scheme and recommends the development of an energy from waste (EFW) policy to provide clarity and direction in this area, particularly determining how landfill and EFW both fit into, and can be progressed within, a successful integrated WARR system.

Support for the resource recovery industry must be backed by sustainable procurement and remanufacturing and WMRR is calling on the Tasmanian government go one step further from encouraging the adoption of sustainable procurement practices to mandating the use of recycled/recovered content in procurement policies for local and state government (setting both targets and timelines), including all state government agencies, and ensuring these are applied in procurement for all building, civil, and infrastructure works. Cost impacts on the community can be balanced with funding from the waste levy.

The Tasmanian government is also encouraged to develop, ideally, nationally consistent specifications and standards to allow for the use of recycled and/or remanufactured goods. Doing so will create greater certainty for all stakeholders.

Ultimately, all government departments and bodies must collaborate to ensure that policy decisions are aligned. Businesses using recycled material need to be confident they will be viable in the medium- to long-term and not adversely impacted by changing policy decisions. |

| 6. Education and community engagement | WMRR agrees that targeted communication and education will assist in lowering contamination levels. The community has shown an interest in WARR and can be educated to recycle. However, a missing piece in the education puzzle to date is emphasis on buying products made from recycled Australian material. The message that ‘you are not recycling unless you are buying recycled’ must be the heart of every campaign – it must be spread and emphasised now and into the future. |
The state government can play a key role in consumer education by educating the community on what MRIs do - only sort yellow bin materials into single streams and these materials are only recycled when they are sent to the right end market – and how the community can exercise their purchasing power to buy products made of Australian recycled materials (to truly close the loop), and to create and fund policies and initiatives that place emphasis on re-use and re-design.

The state government must also drive a consistent education and community engagement approach and not leave this to individual local councils as the success of such a program is highly dependent on consistent messaging and coordination.

Greater clarity, including proposed changes, processes, and timeframes, is sought around:

- The proposed revision of associated regulations, including the Environmental Management and Pollution Control (Waste Management) Regulations 2010 and the Environmental Management and Pollution Control (Controlled Waste Tracking) Regulations 2010.
- The proposed minor amendments to the Environmental Management and Pollution Control Act 1994.
- How C&D waste might be enshrined in the legislation. A suggestion is to develop a C&D waste strategy that includes robust recovery targets.
- What policy and regulatory settings will help Tasmania achieve the targets in this plan and stimulate the resource recovery sector.

WMRR stresses that the industry is able and willing to work with the government to invest in, and build, critical waste and resource recovery processing and infrastructure capacity. However, industry requires certainty in the marketplace and confidence in government policy. As such, WMRR looks forward to consultations occurring within a reasonable timeframe before regulations and policies are developed and/or regulatory and policy changes are made.
4 October 2019

Policy and Business Branch
Department of Primary Industries, Park, Water and the Environment

WAP.Enquiries@dpipwe.tas.gov.au

Dear Sir or Madam

Tasmanian Draft Waste Action Plan

Thank you for the opportunity to provide a submission on the Draft Waste Action Plan. This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of the Local Government Sector in collaboration with our Members, all 29 Local Councils in Tasmania.

LGAT is incorporated under the Local Government Act 1993 and is the representative body and advocate for Local Government in Tasmania. Where a Council has made a direct submission to this process, any omission of specific comments made by that Council in this submission should not be viewed as lack of support by the LGAT for that specific issue.

If you have any questions or would like further information, please do not hesitate to contact Dion Lester at @lgat.tas.gov.au or via phone on (03)

Yours sincerely,

Katrena Stephenson
CHIEF EXECUTIVE OFFICER
LGAT Submission: Tasmanian Draft Waste Action Plan

Introduction

The Tasmanian Government is at a crossroads. Local Government and the community have been calling for leadership and action on waste for several years. Consequently, we welcome the release of the draft Waste Action Plan (WAP) for consultation and particularly the commitment to a statewide waste levy and container refund scheme. However, the WAP does not deliver the clarity and leadership required in adopting a circular economy, particularly in the face of significant global, national and state pressures related to resource use and waste management.

There is a significant opportunity for our state in adopting a circular economy, however the WAP lacks a clear framework, principles, objectives and specific plans for how our state will unlock waste as a resource, so that we can create jobs in new industries and reduce landfill. Local Government, industry and the community are ready to commence this transition, evidenced by the highly successful Food and Waste System Forum recently held at Parliament House. The event brought together leaders and decision makers from government, business, industry, community and research to:

- Identify key priorities in our food and waste systems, including a preliminary set of measurable 2030 goals and targets;
- Identify solutions in Tasmania that are advancing more sustainable food and waste systems; and
- Co-create a roadmap to coordinate greater action to deliver the goals and targets.

Feedback from the participants was overwhelmingly positive, with a significant desire to continue to work together towards achieving a Circular Food Economy in Tasmania.

The opportunities to unlock the value of waste at an industry level are immense but require significant coordination and collaboration from our State Government, as well as real on-ground action.

General Comments

The following section provides overarching commentary against the key Focus Areas and Actions within the WAP. Attachment 1 provides additional specific comments against each Action.

Statewide Waste Levy

Implementation of a statewide waste levy is strongly supported by the Local Government Sector, but it will be critical to work closely together to deliver the right model for
Tasmania. In particular, a statewide waste levy must be fully hypothecated to fund a range of waste management and resource recovery services and projects.

Pricing mechanisms are used internationally and in most Australian states to achieve targets for diverting waste from landfill and to help fund waste reduction activities. The application of a landfill levy is widely held to be the most effective financial lever to divert waste from landfills into resource recovery activities, provided the quantum is sufficient to encourage behavioral change.

In the absence of a statewide levy, Tasmanian landfill prices are amongst the lowest in the country and low landfill prices equate to poor resource recovery. This lack of a statewide landfill levy has created a market environment in our state where resource recovery has a limited capacity to compete with landfill. The low landfill diversion rates result in a low economic benefit from the waste and recycling sector and the loss of the value of recoverable resource. Resource recovery operations employ more people and require greater investment in infrastructure per tonne of material processed compared to landfills.

The current regional and Local Government levies are not adequate to significantly encourage investment in resource recovery by private industry. Additionally, these are applied inconsistently across the state, and consequently waste is likely to be being transported greater distances than necessary in order to realise gate fee savings. In some instances, long-term contracts are a barrier to regional/Local Government landfill operators implementing and/or altering levies.

The implementation of a waste levy needs to be thoroughly considered, and lessons can be learned from other jurisdictions. For example, South Australia recently suffered extreme negativity following a decision to raise the levy considerably without appropriate consultation. Applying levies can impact existing contracts that have not catered for a levy or assumed a lower levy. Queensland has a curious history with their levy being implemented, then withdrawn, then re-implemented. Long term modelling needs to be undertaken and all stakeholders informed throughout the process, and legislative frameworks need to be implemented to ensure future governments cannot repeal or dramatically alter the levy.

This can also be applied to a Container Refund Scheme, where planning needs to consider what has been undertaken elsewhere, and the lessons learned.

The principles of good levy design include:

- Introduce a landfill levy at an appropriate price, with gradual increases over time until the desired level is achieved;
• Provide sufficient lead time and phasing in of the levy to allow the market to respond and transition to the new regulatory environment;
• Levy pricing should provide clear and credible projections, providing industry with certainty and informing investment decision-making;
• Levies should be applied as broadly and consistently as possible to limit the risk of intentional reclassification of some waste, reducing the effectiveness of the levy;
• Exemptions should be kept to a minimum and only granted in accordance with clear, statutorily defined criteria; and
• There needs to be a mechanism for a differential levy structure, having regard to the relative capacity of regions to divert waste to recycling and other facilities. Taking account of socio-economic differences, lack of waste recovery infrastructure and distances (and associated higher transportation costs) in rural and regional areas. This will be particularly important for municipalities such as King Island, Flinders and West Coast Councils.

The Tasmanian Government must provide clear direction on the application of levy revenue. To promote stakeholder acceptance of the need for a levy, the proceeds should be used to fund initiatives in areas such as waste avoidance, market development, recovery and recycling infrastructure, education, increased compliance and enforcement and promoting regional collaboration.

Effective compliance and enforcement are fundamental to the success of any policy and regulatory regime. The intent of legislation and regulation is to shape behaviour and sanction breaches where necessary. In other states, the introduction of, or any significant increase in, a waste levy has generally been the precursor to an escalation in illegal dumping and stockpiling activities. In order for the State to mitigate this risk (or address the unintended consequences), a range of targeted monitoring and enforcement programs will need to be implemented.

The first line of defence is the enforcement capability of the regulators (EPA and Local Government). Appropriate resourcing is required to be both responsive and proactive in engaging with industry and the community. In addition, there needs to be a suite of monitoring and compliance controls and instruments developed or applied to support the effectiveness of regulation and compliance. Data will play a crucial role and is discussed in more detail later in this submission. Without the right data, it will be difficult to understand the effectiveness of regulations and gaps that may allow non-compliance activities. To improve regulation and compliance awareness, the Government must also roll out a fit-for-purpose education program, with target audiences ranging from waste producers to waste and recycling facility operators.

Container Refund Scheme
Local Government welcomes the introduction of a Container Refund Scheme (CRS). It is well documented that the benefits of such a Scheme include increased resource recovery, a reduction in litter and an increase in community awareness and involvement in waste management.

Other jurisdictions have found that the design of their CRS can be captured by the beverage industry, who unsurprisingly seek to influence the Schemes to limit the return rate of containers. While the beverage industry should be a stakeholder in the design and development of a CRS for Tasmania, it must not be the dominant driver. The resource recovery, logistics, not-for-profit and Local Government sectors are critical stakeholders whose participation in Scheme design is paramount.

**Moving to a Circular Economy**

In Tasmania, there appears to have been limited discussion, outside of the waste management industry, on what a Circular Economy is, and if a move to a Circular Economy is an approach that would benefit the State. However, the Circular Economy is becoming a mainstream focus for industry development, waste and resource recovery policies in many jurisdictions. The European Union has taken a strong lead with *Closing the Loop—An EU action plan for a Circular Economy*, which is supported by national strategies in Denmark, Finland, France, Germany, the Netherlands and Scotland. Waste strategies in England, Wales and Canada explicitly target circular practices and China and Japan are implementing a circular approach to reduce their reliance on raw materials. Cities, such as San Francisco and Amsterdam, are also playing an important role in leading the shift at a subnational level. In Australia, most mainland states are investigating what a circular economy would look like for their communities.

Research and analysis from Australia and overseas have shown that transitioning to a Circular Economy can create jobs and contribute to economic growth\(^1\). Modelling undertaken in NSW\(^2\) and South Australia\(^3\) indicates that material efficiency gains could deliver significant long-term job growth compared to a ‘business as usual’ scenario. South Australia, which already has a current recovery rate of over 80 per cent, has estimated that moving to a Circular Economy could create an additional 25,700 jobs within the state by 2030\(^4\). Recognising and responding to this shift is important for Tasmania’s national and international competitiveness.

The Circular Economy approach has potential to change the way waste is viewed and lead to a shift in how products are developed and services provided. However, such a move

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\(^4\) Ibid
will require a considerable change to Tasmania’s current economic system, which will require a whole of Government approach. Local Government believes the Circular Economy could bring significant benefits to not only the waste management industry in Tasmania, but also the economy more broadly. However, detailed analysis of the Circular Economy in a Tasmanian context is required to understand and quantify the costs and benefits of moving to this approach.

The Government needs to clearly identify its position and commitment regarding the Circular Economy and outline its roadmap for transitioning to this different economic system. The roadmap should consider how the economy is currently structured and what policy tools could be used to address priority issues over and above the high-level targets provided in the WAP. The changes to the structure of the economy would initially require incentives to encourage businesses to change their operating model and to create markets for waste materials that would eventually need to become self-sustaining.

When considering what a Circular Economy would mean for Tasmania, it is important to clearly define:

- The scale of the Circular Economy to be adopted - local, regional, state or national;
- The type of benefits that could be realised in Tasmania and the associated adjustment costs (e.g. implications for jobs and economic growth); and
- How other jurisdictions with similar structures and challenges to Tasmania have approached the Circular Economy.

To achieve a shift towards a Circular Economy there is a need to foster cross-government collaboration on resource recovery and waste management issues in the first instance. While the final WAP should incorporate principles that set a path to the Circular Economy, a standalone policy statement on the Circular Economy should be developed as a priority to signal to industry where Tasmania is heading and to guide infrastructure and investment planning during the transitional period and over the longer-term.

As a starting point the Final WAP needs to demonstrate how it will link to other existing Government strategies and policies.

**Governance**

The waste and resource recovery industry has a myriad of touchpoints with different agencies and levels of government and operates within a complex and evolving legislative and policy environment. Tasmania does not have a dedicated body with capacity to provide advice on statewide waste issues to the Tasmanian Government and which has the resources to deliver statewide programs. For example, Sustainability Victoria, Green Industries South Australia and the Western Australian Waste Authority all have strategic
planning and program delivery roles with guaranteed core funding hypothecated from a landfill levy.

In the absence of a single statewide body responsible for implementing the WAP, there is a significant risk of different understandings of who has ownership of the WAP’s implementation and which party is responsible for implementing individual actions. Local Government considers that a coordinated and effective agency must drive the implementation of the WAP. This is particularly relevant for the delivery of waste related policy, strategy, planning, statewide data collection and analysis, coordination of education, Government procurement support and market development. The current Departmental structure does not appear to facilitate easy collaboration across Departments and as a result there could be limited coordination in the approaches of multiple agencies delivering on the WAP. This will make it difficult to effectively influence the decisions of business, the waste management industry and other Government agencies.

The development of the WAP presents an opportunity to review Tasmania’s existing governance framework.

The final WAP requires an organisation to lead and provide oversight of its implementation and funding to deliver programs and or strategic actions. Understanding what this might look like has been an area of investigation by LGAT on behalf of Local Government over the past 12 months.

Statewide Waste Arrangements Feasibility Study

At the July 2018 General Meeting, councils endorsed LGAT undertaking a feasibility study into Statewide Waste Arrangements (the Feasibility Study). The final report is now complete and is available on the LGAT website under Media and Publications > Reports and Submissions.

The Local Government sector considered the recommendations in the Feasibility Study at its General Meeting on 13 September 2019 and overwhelmingly provided in principle endorsement of the recommendations, and in particular numbers two and four included below. LGAT has been instructed to commence discussions with the State Government on the proposed model to gain an understanding of the level of support for the arrangements, as well as the proposed implementation network (co-investment funding model).

Recommendation 2

That LGAT accept a formal shared collaboration structure, co-owned by and accountable to State and Local Government, as the preferred option to deliver the statewide waste management arrangement.
Recommendation 4

That LGAT pursue a co-investment funding model (involving State and Local Government) to enable the implementation arrangement from 1 July 2020 for a period of two years.

This option sets out a model that formally partners Local Government and State Government in leading a statewide arrangement (see Figure 6\textsuperscript{5}). The aim is to pair the historic progress made and competencies held by local governments and their regional bodies with the Tasmanian Government’s ability to formally represent the state, enforce regulations, and enact legislation.

Tasmanian councils have indicated they believe there is significant merit in our sector and the State Government collaborating via a formal partnership to lead the delivery of the final WAP and ongoing strategic management of waste management and resource recovery in this State. The immediate co-investment proposed will enable, via an agreed work plan, progress towards formation of the preferred ongoing arrangement and establishment of statewide functions and activities to complement regional and local actions.

The proposed arrangements (Option 3 in the Feasibility Study) brings together the comparative strengths in local and regional functions and service delivery experience, with the state’s formal representation, regulation and lawmaking capacity. The collaboration model allows for the statewide waste management arrangement to directly use local and regional networks to identify issues. It can also ensure strategies and action plans take account of issues raised regionally and also the decision processes required of Local Government. For example, it will offer a suitable delivery vehicle to implement the final WAP and arguably help to fill many of the gaps in the draft WAP highlighted throughout this submission.

A statewide body can deliver a critical role in brokering and coordinating partnerships between sectors at local, regional and state scales; and applying its functions to drive more resource efficient practices in line with Circular Economy principles. Over time, its influence could extend from a focus on waste and resource recovery market interventions to impact activities ‘upstream’ of waste management (such as influencing purchasing decisions, supply chains, production systems, and product specifications) as well as those that are ‘downstream’ (such as developing new markets and unblocking impediments to market access).

There must be agreement regarding shared responsibility to implement the WAP, between Governments and the waste management industry to deliver improved waste

\textsuperscript{5} In the Part B Report available on the LGAT website
avoidance, resource recovery and consequent diversion of material from landfill. Roles and responsibilities must be clearly negotiated, understood and agreed to by all stakeholders.

**Data, Innovation Networks and Resource Recovery Targets**

Unlike most jurisdictions, Tasmania has not established clear performance targets for resource recovery. Statewide waste resource recovery data collection management systems are required to monitor and evaluate effectiveness of programs and provide public transparency on the progress toward Tasmanian waste and resource recovery goals.

**Data**

Effective decision-making by governments, business, industry and the community, must be supported by reliable, timely and relevant information, including data on material composition, volumes, consumption streams, locations, movements and ultimate fate.

The current absence of data and targets inhibits the comparison of the performance of regions and municipalities against state objectives and/or to identify a need for support or targeted programs. As a minimum data management systems and resources to collect, quality check and disseminate data are required to establish statewide waste baseline data (e.g. waste generation and recovery rate) and to monitor against performance targets.

To support the better use of resources and resource recovery, Government needs to collect and communicate enough information to support investment, inspire public confidence, prevent levy avoidance and facilitate continuous improvement. However, measuring progress towards the Circular Economy also requires a rethink of the traditional indicators and the evidence base required. Whilst it will be essential to ascertain how materials are kept in circulation through reuse and recycling, and other efforts to divert materials from landfill, it is also important to recognise and measure the economic benefits such as the greater jobs, investment in resource recovery and productivity improvements.

**Targets**

Targets should be based on modelling of realistic configurations of infrastructure, engagement and service delivery, with due regard to the differences between metropolitan and regional areas. The methodology used to develop the WAP targets has not been provided. The Waste Strategies adopted by other jurisdictions clearly explain...
what rationale and data have been used to set targets. For example, targets for municipal solid waste (MSW), commercial and industrial (C&I) and construction and demolition (C&D) waste streams in the South Australian Waste Strategy 2015-2020 are based on a detailed analysis that was undertaken as part of the Review of South Australia’s Waste Strategy 2011–2015, annual recycling activity surveys and Zero Waste SA’s own internal analysis. Similarly, targets for the MSW, C&I and C&D waste streams of the NSW Waste Avoidance and Resource Recovery Strategy 2014-21 are based on an independent modelling study conducted on behalf of the EPA.

What analysis and modelling has been undertaken to inform the development of the targets in the WAP?

The WAP fails to detail how targets will drive improvements in the recovery of specific materials. To change behaviours and focus activity, there needs to be a combination of strategies grouped around knowledge, enabling infrastructure and incentives. Knowledge plays an important role in getting individuals and organisations started on behavioural change, but it is only a start. Knowledge needs to be complemented with the incentives and the practical support individuals and organisations need to act on their decision to change behaviours. Access to appropriate enabling infrastructure is critical in allowing individuals and organisations to engage with waste management options to improve their effectiveness and efficiency. Enabling infrastructure includes the physical facilities necessary to manage waste, as well as the organisational structures of government and legislation applying to individuals and organisations.

Appropriate knowledge and enabling infrastructure can assist in removing barriers to behaviour change, and incentives can provide a driving force for change. Incentives can be positive, such as funding, or negative, such as penalties and compliance actions.

The final WAP needs to detail how the targets will drive improvements in the recovery of specific materials through a combination of strategies grouped around knowledge, enabling infrastructure and incentives.

Priority Materials

Have the highest priority wastes for Tasmania been identified? Will they be?

In order for the resource recovery targets to be achieved there is a need for implementation/action plans to be included in the final WAP on priority issues and materials. It is difficult to identify the methodology that will be used to determine priorities from the information provided in the WAP. Local Government suggests that the focus of the final WAP, as communicated through targets, should also determine priority materials. For example, if the aim of the WAP is to divert tonnes from landfill, materials such as organics and C&D waste will become high priority materials. However, if the WAP
is designed to pursue the adoption of a Circular Economy, an assessment of available materials and where they can be used will determine priority.

By way of illustration, and to inform consideration of the priority areas the WAP needs to address, the LGAT Statewide Waste Feasibility Study previously discussed, captured stakeholder interests across Local Government, regional authorities, the Tasmanian Government and the resource recovery sector. As part of this engagement, four problem areas were identified by stakeholders as priorities:

1. Poor cohesion in the demand for organics recovery services;
2. Insecure market for investing in recovery infrastructure;
3. Risks and harms incurred by tyre stockpiles and illegal dumping; and
4. Resource inefficient use of single use plastics and packaging.

Attachment 2 presents Investment Logic Map (ILM) outputs for the four agreed problem areas that a statewide arrangement (and the WAP) could prioritise. Four diagrams were then prepared; drawing on stakeholder views on the nature of problems, benefits and potential functions relating to those problem areas. These functions define the scope of roles and inform the procedural objectives that need to be delivered. Each diagram is accompanied by a set of bullet points that explains why a problem is perceived in that area and why action is justified.

This work illustrates the type of plan that needs to be developed for the final WAP on priority materials.

Infrastructure Planning

The capacity of Tasmania’s statewide waste and resource recovery system to manage the current and likely future need has been untested. Infrastructure planning is required to:

- Identify the existing critical waste infrastructure required to guarantee delivery of essential waste and resource recovery services;
- Address future infrastructure gaps likely to arise from population and economic growth (including landfill airspace);
- Identify appropriately zoned precincts for future developments and ensure adequate buffers;
- Identify contingency arrangements for emergency events and/or natural disasters; and
- Provide a roadmap to achieve a mix of infrastructure that will maximise the recovery of valuable resources and minimise the environmental and public health impact on Tasmania’s communities.
Support Resource Recovery across Industry

A range of issues in the current resource recovery system have been identified that prevent greater resource recovery; including infrastructure, services and the recovery of priority materials. Significant opportunities exist for improving resource recovery rates which target priority materials such as organics, materials from the C&D sector, optimising kerbside systems, upgrade of Local Government infrastructure to best practice and addressing more efficient collection of problematic wastes such as hazardous household wastes. For each of these, local solutions are particularly important, as access to markets is limited in Tasmania, and transport costs and impacts are high. Tasmania also has a significant opportunity to benefit from greater local recovery and recycling activity.

The final WAP must focus on identifying and prioritising local market solutions for those recyclable materials traditionally exported from the state. Attracting investment into local reuse options requires a degree of certainty which has not been present under standard market conditions in Tasmania. This will rely on procurement decisions recognising the benefits that local reprocessing, and the use of products made locally from recycled materials, can offer compared to national or international export options. The WAP is silent on Government procurement targets.

Councils and regional waste authorities are the primary waste managers that provide household waste collection and recycling services, manage and operate landfill sites, and deliver education and awareness programs. They also provide information, infrastructure and incentives that encourage behaviour change and plan for the management of waste within their local areas. With increased support it is councils and regional waste authorities that will identify local, fit-for-purpose solutions working with their local industries that align with the final WAP and support a move towards becoming a Circular Economy.

The recent disruptions to the global trade in recyclables have created major challenges in the short-term for some parts of Tasmania. However, with appropriate market development there is an opportunity for a number of existing and new Tasmanian businesses to scale up or find new, productive uses for much of the recycled materials that we traditionally exported. To support this transition, the Tasmanian Government must consider its role (and that of Local Government) in driving better material outcomes, particularly by:

- Purchasing more products made from recycled materials; and
- Using more recycled materials in the construction of roads, buildings and other civil infrastructure, for example.
Education and Community Engagement

In recent decades, there has been increasing awareness of the impact of waste on the environment, and the need to adopt more sustainable habits and practices of production, consumption and disposal. However, there are still multiple barriers to change in Tasmania. For example, awareness still remains low (particularly in a practical, day-to-day sense) and for those who are aware, there is uncertainty about what action to take and the reliability of the end to end processes, a situation made more acute by the recent challenges with kerbside recycling.

To overcome these barriers, a cohesive, high-impact education strategy is required at a whole-of-state level. This will require collaboration across all levels of government, informed by community and industry input. Roles and responsibilities for education should be clearly articulated in a Government education strategy, with funding and incentives linked to education outcomes and objectives.

State and National Policy and Regulatory Settings

A clear policy commitment is required to evaluate and implement national product stewardship schemes which provide a cost/benefit to the state. State leadership, support and co-ordination is required to ensure the success of extended producer responsibility programs.

To date, a lack of State Government advocacy and support for implementation of national product schemes has resulted in additional costs to Local Government and poor outcomes for the state.

Conclusion

All Australian states and territories, except Northern Territory and Queensland, divert a significantly greater percentage of material from landfill. The Tasmanian landfill diversion rate is significantly lower than the national average and almost half that of the ACT, NSW, Victoria and South Australia.

In order to unlock waste as a resource, so that we can create jobs in new industries and reduce landfill, we need a tangible commitment and action from the State Government. The opportunities to realise the value of waste at an industry level are immense. While the draft WAP provides a useful starting point, as outlined in this submission there is significant further work required in producing the final WAP to drive the significant coordination and collaboration necessary from the State Government, as well as real on-ground action. Without this Tasmania risks missing out on the significant opportunities that improved resource recovery offers.
<table>
<thead>
<tr>
<th>AREA &amp; ACTIONS</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. Circular Economy</strong></td>
<td>Local Government is supportive of moving towards a circular economy and promoting and adopting circular economy principals.</td>
</tr>
<tr>
<td>No Actions</td>
<td>However, no actions are listed regarding this focus area.</td>
</tr>
<tr>
<td><strong>2. Governance</strong></td>
<td>Local Government is supportive of development of a state-wide governance model. Councils and regional waste authorities have been actively involved in providing input into the feasibility study into a statewide waste arrangement (as discussed earlier in this submission) coordinated by LGAT, with support from the EPA. The Study has gained support from Local Government and feedback from the resource recovery industry is also positive.</td>
</tr>
<tr>
<td>Investigate and discuss models for waste management governance with Local Government.</td>
<td></td>
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<tr>
<td>Establish a relevant administrative structure.</td>
<td></td>
</tr>
<tr>
<td><strong>3. Data, Innovation Networks and Resource Recovery Targets</strong></td>
<td>Standardising data has been a common theme amongst Local Government and industry for a long time. This is applicable not only to Tasmania but also to national waste data reporting. Any action led by the State in this regard is welcomed.</td>
</tr>
<tr>
<td>Help to support the establishment of standardised data management systems to capture waste data, to monitor progress against targets and facilitate businesses investment in resource recovery.</td>
<td></td>
</tr>
<tr>
<td>Develop and support waste-related innovation and research networks in the bioeconomy, agritech, tourism, education (STEM), and renewable energy sectors.</td>
<td></td>
</tr>
<tr>
<td>Adopt the following targets for waste and resource recovery:</td>
<td></td>
</tr>
<tr>
<td>• Reduce waste generated in Tasmania by 5% per person by 2025 and 10% by 2030;</td>
<td></td>
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<tr>
<td>• Ensure 100% of packaging is reusable, recyclable or compostable by 2025;</td>
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<tr>
<td>• Achieve a 40% average recovery rate from all waste streams by 2025 and 80% by 2030;</td>
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<tr>
<td>• Have the lowest incidence of littering in the country by 2023;</td>
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<tr>
<td>• Reduce the volume of organic waste sent to landfill by 25% by 2025 and 50% by 2030;</td>
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</table>
**4. Infrastructure Planning**


Local Government is supportive of the development of a Waste and Resource Recovery Infrastructure Plan. This will assist with delivering state and/or regional facilities and generate benefits from economies of scale.

There are significant opportunities for rationalisation of infrastructure and long-term planning that isn’t defined by municipal boundaries.

Any infrastructure plan needs to include detailed mapping of infrastructure across government, private business, and community groups. There is an opportunity to widen the scope to include services in addition to infrastructure.

Infrastructure to support re-manufacture, re-purpose, design for re-use, and recycling are preferable to any infrastructure that focusses on end of pipe treatment of waste (such as incineration).

Regional facilities are required right now to recover and treat waste items such as organics, construction and demolition waste, and commercial and industrial waste. Investment by the State in this field is welcomed.

**5. Support Resource Recovery Across Industry**

Develop capacity across Government to support business development in the waste and recycling industry.

Establish a loan scheme for businesses and local government that helps grow locally based and innovative recycling and processing facilities which increase recycling rates while also delivering new jobs across Tasmania.

Local Government has received feedback from industry regarding a need for access to capital to realise projects and to enable business creation. As such Local Government is supportive of actions, such as loan schemes, and business development.

While the actions contained in this section are supported, it remains unclear how they will be resourced, both in terms of finance required, and staffing.
<table>
<thead>
<tr>
<th><strong>6. Education and Community Engagement</strong></th>
<th><strong>7. State and National Policy and Regulatory Settings</strong></th>
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<tbody>
<tr>
<td>Support industry to use materials effectively, reuse materials and to understand the business case to improve resource recovery.</td>
<td>Work with Local Government to introduce a statewide waste levy by 2021 to fund waste management and resource recovery activities.</td>
</tr>
<tr>
<td>Develop an Organic Waste and Resource Recovery Strategy by the end of 2020.</td>
<td>Local Government has been advocating for a waste levy for a number of years and is supportive of this action. In the course of advocating for a levy, Local Government has detailed certain criteria including that any levy be returned to waste management, and not absorbed into State Government general revenue.</td>
</tr>
<tr>
<td>Develop a Tasmanian Market Development Study by the end of 2021.</td>
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<tr>
<td>Continue to investigate and provide appropriate support for Energy from Waste and Bioenergy options, which includes the management and utilisation of forest residues.</td>
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<tr>
<td>Support the investment in industrial waste sorting – in particular construction and demolition waste.</td>
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<tr>
<td>Boost demand for recycled products through adoption of sustainable procurement practices across State and local government.</td>
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</tr>
<tr>
<td>There is no indication of the level or type of ‘support’ to be provided, and for a plan that is tackling waste, the focus on education and engagement here is extremely small.</td>
<td></td>
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<tr>
<td>Education and engagement are vital to the success of programs in this field, and by presenting one paragraph it appears to be significantly undersold, and the one action within the plan is quite vague.</td>
<td></td>
</tr>
<tr>
<td>Local Government is supportive of broad community engagement to educate about waste minimisation, particularly with a focus on consumption and avoidance of waste, however more details are required on what is envisaged with this action.</td>
<td></td>
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<tr>
<td>Introduce a Container Refund Scheme into Tasmania by the end of 2022</td>
<td>There is no detail in regard to the levy charge. Voluntary levies have existed in Tasmania, ranging from $2 up to $10 per tonne of waste to landfill. Work with the Australian Government to ensure that reviews of relevant legislation, such as the Product Stewardship Act 2011, result in effective programs that enhance resource recovery</td>
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<tr>
<td>Driving up landfill rates by adding a levy will also reduce the gap between landfill and recycling programs, making recycling options more attractive. Local Government has been advocating for a Container Refund Scheme (CRS) to be introduced in Tasmania. Council officers have consulted with the EPA appointed consultants who developed the model framework for a CRS. A well-managed CRS will reduce the strain on kerbside recycling systems, in particular a large portion of glass (around 40% of the kerbside recycling bin). It will lead to reduced litter as items become more valuable, and it will deliver financial benefits to community groups. Local Government will continue to monitor development of the CRS and its suitability, such as adequate number of drop off points proposed, and impacts on kerbside recycling contracts. Local Government is supportive of the development of further programs under the Product Stewardship Act. Many councils have tapped into national programs in the past such as paint, and ewaste.</td>
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**GAPS IN THE WAP**

**Response to emergency situations**

From time to time there are unforeseen events that impact the waste industry. Circumstances such as loss of markets, and loss of facilities and infrastructure through natural disasters, can lead to emergency actions being required. Contingencies should be planned for within this plan.
**Determination of resourcing levels to implement this plan**

To achieve the outcomes contained within the plan, a significant level of resourcing, both in terms of finance, and staffing, needs to be secured. There is no indication of the level of resources required to implement this action plan, or where the funds or staff will come from.

*Local Government resource recovery facilities and kerbside collection*

For Local Government, key responsibilities include the collection of waste and recycling from rate payers, whether through kerbside collection or by providing transfer stations and landfills.

All regions have identified a need for the assessment of the operation of transfer stations to best practice. The upgrade of facilities and the transfer station network, in particular smaller sites, is required in order to improve usability and site safety, recover more materials of differing types and improve site management including data collection.

The recent recycling market disruptions and resultant challenges with kerbside recycling are unlikely to abate in the near future. The final WAP needs to recognise and respond to the recent COAG commitment that “Australia should establish a timetable to ban the export of waste plastic, paper, glass and tyres, while building Australia’s capacity to generate high value recycled commodities and associated demand”.

*Household hazardous waste*

The issues with household hazardous waste have been constantly raised for a number of years by Local Government as a priority action. Household hazardous wastes include items such as old medications, chemicals, paints, and batteries. Several years ago, the State Government funded a 3-year program providing an avenue for the community to dispose of household hazardous wastes in a controlled environment through a series of free drop off days shared amongst regions. This program was very successful but ceased when government funds allocated to the program were exhausted.
Northern Tasmanian Waste Management Group (NTWMG) submission on the Tasmanian Government's *Draft Waste Action Plan*
If further information on this submission is required, please contact:

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# Abbreviations

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<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>C&amp;D</td>
<td>Construction and demolition</td>
</tr>
<tr>
<td>C&amp;I</td>
<td>Commercial and industrial</td>
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<tr>
<td>CCWS</td>
<td>Cradle Coast Waste Services</td>
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<tr>
<td>CPI</td>
<td>Consumer price index</td>
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<tr>
<td>CRS</td>
<td>Container refund scheme</td>
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<tr>
<td>EPA</td>
<td>Environment Protection Authority</td>
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<tr>
<td>FOGO</td>
<td>Food and garden organics</td>
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<tr>
<td>LWC</td>
<td>Launceston Waste Centre</td>
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<tr>
<td>MRF</td>
<td>Materials recovery facility</td>
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<tr>
<td>NTWMG</td>
<td>Northern Tasmanian Waste Management Group</td>
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<tr>
<td>O–I</td>
<td>Owens-Illinois</td>
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<tr>
<td>UTAS</td>
<td>University of Tasmania</td>
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</table>
1 Opening remarks

1.1 The Northern Tasmanian Waste Management Group (NTWMG) welcomes the Tasmanian Government’s commitment to improving Tasmanian resource recovery through the release of the Draft Waste Action Plan.

1.2 The NTWMG has been a foundation stone upon which much of Tasmania's current resource recovery achievements have been built. The NTWMG is leading the state in:

- kerbside education through the daily kerbside recycling assessment program (nearly 36,000 households assessed since 2013).
- infrastructure funding to government and industry, with $460,000 given out since 2013 to support innovative waste diversion across Tasmania. Recipients of grant funding include Environex, City Mission, local councils, local schools and childcare centres, UTAS and community organisations.
- community recognition through the Waste NoT Awards.
- communications, online and media promotions, including the statewide Rethink Waste website.
- coordinated and consistent waste and resource recovery services across six northern Tasmanian councils including batteries, fluorescent lights, paint, e-waste, and household hazardous waste collections (both low and high toxicity hazardous materials collected).
- data collection at all major landfills and transfer stations in northern Tasmania.
- research, including into problematic materials such as tyres, gas bottles, construction and demolition waste, and organics, as well as research including landfill composition and kerbside bin audits, and the development of a Tasmanian specific transfer station best practice guide.
- regional knowledge sharing through quarterly NTWMG meetings and the establishment of the annual Waste Forum with guest speakers from Tasmania and the mainland.

1.3 The NTWMG is highly regarded by its member councils and by members of the community including community groups and schools, as well as businesses in Tasmania.

1.4 The NTWMG is funded solely through its $7.50/tonne landfill levy. The NTWMG has been collecting this levy since 2007, when it started at $2/tonne. The NTWMG levy, collected on all waste disposed to landfill from northern Tasmania, is essential for enabling the NTWMG to achieve tangible, practical and coordinated waste and resource recovery outcomes across Tasmania. The levy also pays for the salaries of 2.88 full time equivalent staff.

1.5 The NTWMG strongly advocates the Tasmanian Government to:

- guarantee funding and resourcing (and to increase funding over time) to the NTWMG at levels projected in the NTWMG’s 2017–2022 strategy under any future statewide waste levy to ensure the NTWMG can continue to make a positive difference to waste and resource recovery in Tasmania.
- acknowledge the substantial work, leadership and successes achieved by the NTWMG since 2007.
- recognise the NTWMG as leaders in resource recovery, education, communication and sustainable waste management in Tasmania.
- call upon the NTWMG to provide advice and expertise to the government on matters of waste and recycling in Tasmania.
- consult extensively with the NTWMG about any future governance and funding arrangements arising from a statewide waste levy.
2 Introduction

The important role of local government for achieving better waste and recycling outcomes for Tasmania

2.1 The NTWMG is providing this submission on behalf of its six member councils: Break O’Day, George Town, Launceston, Meander Valley, Northern Midlands and West Tamar. Each of these councils may also provide their own submissions in addition to being signatories to this submission.

2.2 Local governments in Australia play an essential role in waste and recycling management through the collection and transfer of household waste and recyclables to landfill and recycling facilities. In addition to the operational aspects of waste and recyclables collection, local governments provide essential education to households to improve their recycling behaviour.

2.3 In northern Tasmania, two councils – Launceston and Meander Valley – operate putrescible landfills in addition to providing kerbside services. Georgetown Council operates an inert landfill. The City of Launceston has also taken a leadership role in Tasmanian waste management by establishing a commercial food and green organics composting facility at the Launceston Waste Centre (LWC).

2.4 Local governments in northern Tasmania have demonstrated their commitment to improving resource recovery and have had significant successes working together to achieve positive regional improvements to resource recovery and education. Through the NTWMG, northern Tasmanian councils have a detailed, comprehensive and evidence-based program of projects and services that are achieving significant improvement to resource recovery in the region. This places northern Tasmanian local governments in a strong position to provide advice and information to the state government on how best to achieve waste management improvements at the local level.

2.5 Northern Tasmanian councils collectively took a leadership role in 2007 when they established the NTWMG. The NTWMG exists to provide advice, funding and education to better manage waste and recycling in northern Tasmania. It also plays a critical role in facilitating regional collaboration and consistency in waste and recycling services and projects, and in the provision of region-wide education. All of these services, education and projects are paid for through a voluntary waste levy which the northern councils all agreed to implement in 2007 in order to achieve improvements in waste management.

2.6 A priority for northern Tasmanian councils into the future is to ensure the NTWMG can continue to deliver its successful programs under a statewide levy. The NTWMG councils are motivated to maintain the NTWMG’s successes and welcome an opportunity to expand the NTWMG’s program offering and build on achievements made.

2.7 While we congratulate the Tasmanian Government for proposing a statewide waste levy, we also welcome the opportunity for ongoing discussions with the Tasmanian Government on the introduction of a statewide waste levy and how the NTWMG can expand on its achievements alongside the introduction of a statewide levy.

2.8 The NTWMG supports the proposed levy and other initiatives in the Draft Waste Action Plan. However, we have some concerns we would like the government to address:
The member councils of the NTWMG wish to see the NTWMG’s role and functions maintained and expanded upon under a statewide levy. We believe it is essential that the NTWMG, which has achieved significant outcomes since 2007, receive sufficient funding to enable it to continue delivering waste and resource recovery projects for the benefit of northern Tasmanians, as per the NTWMG’s 2017–2022 strategy. The member councils want to maintain staffing and resources at their projected rate to ensure continuity, and expansion, of services, projects and education to northern Tasmanian councils, businesses and residents into the future.

We support a statewide levy, however, our strong preference is for the government to reinvest all of the funds raised through a statewide waste levy back into waste and resource recovery initiatives and programs. We share concerns expressed by councils and waste industries in other jurisdictions that landfill levies in other states act as a budget offset mechanism with insufficient monies reinvested back into waste and recycling infrastructure and programs. Our preference is for levies to be reinvested into waste and recycling services, education, projects and infrastructure and for levy disbursement to be transparent.

Tasmania faces logistical challenges, namely more difficult access to mainland and international markets by virtue of being an island. Having a relatively small population of only 520,000 people, waste and recycling in Tasmania also faces challenges of economies of scale, which can make the ongoing viability of recycling difficult. This is especially so with volatile commodity prices and tighter international import restrictions. We strongly advocate for the government to raise sufficient levy income to help offset some of these logistical challenges to help ensure the viability of Tasmania’s recycling industry into the future.

2.9 We welcome the opportunity to discuss with the government the legislative and regulatory mechanisms that will apply to a statewide waste levy. We also welcome the opportunity to discuss the future governance arrangements for the NTWMG and state government under a statewide levy.

2.10 We welcome the opportunity to discuss with the government the best way to achieve waste and resource recovery improvements in Tasmania using our extensive experience as leading managers of waste and recycling services in Tasmania.

2.11 We have provided specific comments on each section of the Draft Waste Action Plan below.

3 Comments on the statewide waste levy

The need for a hypothecated account and allocated resources to regional bodies

3.1 We support the introduction of a statewide waste levy. We encourage the government to hypothecate the waste levy into a dedicated account for reinvestment back into waste and recycling programs. This is preferred over the levy being placed into general revenue, as occurs in NSW. An arrangement similar to South Australia’s Green Industry Fund where the levy is accumulated into a dedicated resource recovery fund is preferred to ensure funds remain quarantined for waste and recycling initiatives (Green Industries SA Act 2004, Part 3, S. 17).

3.2 We assume the NTWMG will need to cease collecting a voluntary levy if a statewide waste levy is introduced. The NTWMG plays a critical role in delivering programs and services for its member councils, from education of households to managing contracts that enable recycling of, among other items, batteries, paint, e-waste and polystyrene from member councils. The voluntary regional levy has allowed the NTWMG to achieve the following:
Since 2012 the NTWMG has diverted over 17,500 tonnes of materials from landfill. This includes many toxic or hazardous materials, including batteries, paint, e-waste and household hazardous waste. Without the regional waste levy, these multi-council recovery projects would not have occurred.

A regional levy has allowed the group to undertake extensive community education through over 35,000 daily kerbside recycling bin assessments, community and school visits, funded the development of a statewide website – Rethink Waste, and provided nearly $460,000 in funding for waste infrastructure, including a tyre de-rimmer, transfer station upgrades, school recycling infrastructure and a polystyrene extruder.

Rolling out region-wide electronic data collection from regional transfer stations, as well as undertaking kerbside bin and landfill audits every four years. Data from these projects has provided invaluable information for the NTWMG’s priority projects and provided the impetus for selection of materials for recovery.

Development of a five-year Tasmanian Waste Communication Management Plan 2017-2022, a Tasmanian-centric communications plan between the NTWMG and the Cradle Coast Waste Services (CCWS) group. This plan has enabled consistent education and advice about waste and recycling to be disseminated across north, north west and southern Tasmania using print, radio, TV, internet and social media formats.

With support from the NTWMG, the City of Launceston has been able to reduce organic waste to landfill with the establishment of commercial composting at the LWC.

3.3 If a regional levy no longer exists, to enable the NTWMG to continue its success in increasing resource recovery in northern Tasmania, we believe resources from a statewide levy should be allocated to the NTWMG to both continue and expand on its work. The NTWMG is highly respected by its member councils for the significant outcomes it has achieved since 2007. All member councils strongly advocate for the NTWMG to continue being the delivery organisation for coordinated waste and resource recovery in northern Tasmania into the future.

3.4 The NTWMG's levy currently sits at $7.50/tonne, with an intent to increase the levy to $10/tonne by 2022 (NTWMG 2017, p. 11). The NTWMG's forecast income for 2019/20 is $715,000 which will enable it to deliver a suite of projects, as shown in Appendix 1. If the NTWMG were to increase its levy to $10/tonne as proposed, the forecast annual income increases to $953,000.

3.5 Using the NTWMG's calculations in Table 1, a proposed statewide waste levy of $15/tonne could provide an annual income of $1,035,384 to the NTWMG (and another two waste groups if the government deemed this proposal appropriate). This level of funding would enable maintenance of the NTWMG's current staffing, programming and services. It would also provide $3.1 million to the state government to develop state policies, strategies and programs to improve waste management and to deal with legacy issues (e.g. landfill rehabilitation) and to support new infrastructure (i.e. through loans or grants).

3.6 We ask the government to consider increasing the levy annually to enable expansion of waste and recycling services into the future.
Table 1: Estimated Tasmanian waste levy and possible option for disbursement

<table>
<thead>
<tr>
<th>Tonnes</th>
<th>414,154*</th>
<th>50% to state, 50% to groups</th>
</tr>
</thead>
<tbody>
<tr>
<td>Levy rate</td>
<td>Income</td>
<td>State govt'</td>
</tr>
<tr>
<td>$10</td>
<td>$4,141,535</td>
<td>$2,070,768</td>
</tr>
<tr>
<td>$15</td>
<td>$6,212,303</td>
<td>$3,106,151</td>
</tr>
<tr>
<td>$20</td>
<td>$8,283,070</td>
<td>$4,141,535</td>
</tr>
<tr>
<td>$25</td>
<td>$10,353,838</td>
<td>$5,176,919</td>
</tr>
<tr>
<td>$30</td>
<td>$12,424,605</td>
<td>$6,212,303</td>
</tr>
<tr>
<td>$35</td>
<td>$14,495,373</td>
<td>$7,247,686</td>
</tr>
<tr>
<td>$40</td>
<td>$16,566,140</td>
<td>$8,283,070</td>
</tr>
</tbody>
</table>

SOURCE: EPA Tasmania 2017

3.7 We strongly advocate for the NTWMG to be resourced in a way that allows it to keep delivering outputs and expanding on its services, such as data collection, recycling services and community education. We trust that a statewide levy will also enable the NTWMG to continue and expand its role as a facilitator of regional resource recovery projects and services in northern Tasmania. Table 1 provides an example of how resourcing for the NTWMG might occur.

3.8 We advocate for the ability of the NTWMG to apply for additional funding from the statewide waste levy for specific or innovative waste recovery projects to meet regional needs or state waste policies. This could be similar to funding rounds run by other state governments for waste and resource recovery infrastructure.

3.9 In NSW, the waste levy increases by the consumer price index (CPI) annually (Protection of the Environment Operations (Waste) Regulation 2014). We advocate for an annual CPI increase to the Tasmanian waste levy to ensure the levy maintains its value in real terms.

Consulting on draft legislation about the mechanisms of levy collection, including rebates and levy collection requirements

3.10 We ask that the government consults with the NTMWG and its member councils regarding the legislative mechanisms for collecting the levy. This includes providing councils with information on the kind of record keeping required by councils for levy collection at sites with and without weighbridges, and also on the weight conversion factors to be used for sites without weighbridges.

3.11 We would welcome the opportunity to discuss the waste categories for which a landfill levy will apply. This is particularly important as clean fill is currently accepted for free at the LWC and thus no regional NTWMG levy applies. If clean fill is to incur a levy, the City of Launceston will need to give sufficient notice to users that a future fee will apply. We note that both Victoria and NSW apply a landfill levy for clean fill/natural excavated materials (NSW EPA 2018, EPA Victoria 2016), and South Australia is about to introduce a levy on clean fill (EPA South Australia 2019a).

However, Victoria offers an annual rebate for cover material which is equal to 15% of all waste disposed at a given landfill (EPA Victoria 2016), and South Australia is considering introducing a 10% landfill cover deduction on waste levies which avoids the need to offer rebates (EPA South Australia 2019a). Our preference is to have a deduction for clean fill/cover, as per South Australia’s proposed arrangements, to avoid the potential for fraud from mislabelled waste (Senate Environment and Communications References Committee 2018, p. 48, EPA South Australia 2019a, p.7).
3.12 We would like the opportunity to discuss with the government how a levy would apply to organics processing which occurs within a landfill site. Food and garden organics (FOGO) enter the LWC’s landfill site in order to be processed at a composting facility which is located on a capped part of the existing landfill. FOGO destined for the LWC’s composting facility does not incur the regional $7.50/tonne levy even though it enters the landfill site. We would like to discuss with the government how the levy may apply: will all materials entering a landfill site be subject to a levy, with a discount offered for daily cover and materials recycled/recovered (as is proposed for South Australia), or will certain materials be exempt such as materials destined for compost facilities? Our preference is the latter as we want to promote composting as the cheaper alternative to landfilling through a lower gate rate.

3.13 We would like to discuss with the government the opportunity to include a rebate for materials recovered from landfill for reprocessing. We propose that a rebate could apply to materials removed from within the landfill boundaries to be recycled, reprocessed or reused outside of the landfill. This is in line with Victoria’s recycling rebate (EPA Victoria 2016). Such a rebate would provide an economic incentive to establish a commercial and industrial (C&I) / construction and demolition (C&D) recovery operation at a landfill face.

3.14 As a region with three active landfills managed by local government, we welcome the opportunity to discuss with the government any exemptions/deductions/rebates of a future waste levy such as, but not limited to:

- materials for construction works or roads at the landfill (i.e. operational use, see EPA South Australia’s (2019a, p.8) proposed new regulations on a levy exemption for operational use of materials)
- materials for bedding layers to protect a landfill’s geomembranes/liners
- materials for capping closed landfill cells
- waste from a natural disaster
- shredder floc from scrap metal recovery.

3.15 We ask that the government considers a levy exemption for asbestos which is already subject to poor disposal practices. A higher disposal rate may further discourage appropriate disposal of this hazardous material. The South Australian Government does not apply the levy for correctly packaged, secured and labelled asbestos (EPA South Australia 2019b).

3.16 Councils within the NTWMG provide a charitable concession for charitable waste disposal. In 2018/19, the City of Launceston concession was valued at $28,000 and was provided to approved charities as an annual landfill disposal allowance. To ensure equity and fairness across the state, we ask the government to consider South Australia’s approach of a reduced levy for charitable waste (EPA South Australia 2019b). Note that we advocate for this reduced levy rate because charities are often treated as waste sites with people dumping waste on charities instead of paying for disposal. Therefore appropriate compensation to charities to manage illegally dumped waste may be appropriate.

3.17 We ask the government to publish guidelines on the application of the levy, similar to the NSW EPA’s ‘Waste Levy Guidelines’ (2018), or EPA Victoria’s ‘Calculating the landfill levy and recycling rebates’ (2016).
Benefits of a weight based waste levy

3.18 We commend the government’s intention to introduce a statewide waste levy. Levies provide an important market signal that landfilling is less desirable than the recovery of resources. A statewide waste levy will encourage investment in resource recovery infrastructure and change behaviour, particularly in the C&I and C&D sectors.

Limitations of a weight based waste levy

3.19 We encourage the government to consider resource recovery using a value perspective in addition to a weight-based perspective. While we fully support a weight-based waste levy, it can lead to perverse outcomes for high value but lightweight materials. For example, while recovering C&D makes overall recovery look good because C&D is heavy, recovery of materials such as food and green waste, and high value but comparatively light materials such as glass and aluminium, achieve a far superior economic outcome per tonne than concrete recovery, as shown in Table 2.

Table 2: Commodity prices for various materials (recyclate and virgin materials)

<table>
<thead>
<tr>
<th>Material</th>
<th>Commodity price per tonne of recyclable materials</th>
<th>Virgin material commodity price ($/t)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aluminium</td>
<td>$1,100*</td>
<td>$1,900*</td>
</tr>
<tr>
<td>Concrete (aggregate)</td>
<td>$18–19/tonne*</td>
<td>$17.60*</td>
</tr>
<tr>
<td>Glass (source separated)</td>
<td>$70*</td>
<td>$550–$650*</td>
</tr>
<tr>
<td>Plastic PET</td>
<td>$400*</td>
<td>$1,300–$1,400*</td>
</tr>
<tr>
<td>Plastic HDPE</td>
<td>$500*</td>
<td>$1,700–$1,800*</td>
</tr>
</tbody>
</table>


^ Cradle Coast Waste Management Group & Northern Tasmanian Waste Management Group 2014a, p.42

3.20 For the longevity of the Tasmanian recycling industry, and to maximise job opportunities, we believe recovery should be geared towards higher value materials which provide a larger buffer against commodity price fluctuations and which build resilience within the recycling system.

3.21 The indicator of successful recycling is not necessarily the weight of materials recovered, but rather the value of materials to the economy and the job creation potential of that recovery. As noted by Peter Shmigel, the Chief Executive Officer of the Australian Council of Recycling:

“When you only look at waste and recycling by weight, you get pretty good outcomes in some areas, because you design instruments like landfill levies that are weight based, and then you get much lower outcomes around products, materials, streams and activities that are inherently lighter and that are more complex” (Senate Environment and Communications References Committee 2018, p. 113).

3.22 Coupled with economic value, we ask that consideration be given to the environmental outcomes from recovering different materials when determining mechanisms to recover materials. Table 3 shows the differences in environmental value for each tonne of materials recycled. As with economic value in Table 2, recycling concrete yields the lowest environmental benefit compared to lighter and more complex materials. Recycling concrete also saves the least landfill airspace compared to other more complex materials including glass and organics. Given organics, packaging and problematic plastics are all targets in the Draft Waste Action Plan, and with weight being less of a driver for recovery for these materials, we ask the government to consider additional incentives to encourage
recovery of these materials, whether they be regulatory (i.e. landfill bans) or financial (i.e. grants/low interest loans).

Table 3: Environmental benefits of recycling certain materials

<table>
<thead>
<tr>
<th>Material</th>
<th>Greenhouse benefits (t/CO₂ eq) /tonne recycled</th>
<th>Energy savings (gigajoules) /tonne recycled</th>
<th>Water savings (kL) /tonne recycled</th>
<th>Landfill savings (m³) /tonne recycled</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aluminium</td>
<td>17.2</td>
<td>191.42</td>
<td>202.03</td>
<td>7.2</td>
</tr>
<tr>
<td>Concrete</td>
<td>0.02</td>
<td>0.35</td>
<td>1.28</td>
<td>1.2</td>
</tr>
<tr>
<td>Glass</td>
<td>0.62</td>
<td>6.85</td>
<td>2.44</td>
<td>2.4</td>
</tr>
<tr>
<td>Plastic PET</td>
<td>1.18</td>
<td>55.49</td>
<td>-22.56</td>
<td>13.9</td>
</tr>
<tr>
<td>Plastic HDPE</td>
<td>1.08</td>
<td>57.92</td>
<td>-3.58</td>
<td>13.9</td>
</tr>
<tr>
<td>Food and garden organics</td>
<td>0.25</td>
<td>0.18</td>
<td>0.44</td>
<td>45.8</td>
</tr>
</tbody>
</table>

SOURCE: NSW EPA 2016

4 Comments on a container refund scheme (CRS)

4.1 We support the implementation of a CRS. We ask the government to consider using existing transfer stations in northern Tasmania as depots for recovery of beverage containers. Using existing transfer stations may be a cheap and efficient way to establish the CRS as transfer stations already have much of the required infrastructure in place to recover these materials. Further, scout groups and other charitable organisations may also be worth considering when rolling out CDS as CDS could provide a valuable income stream for these types of organisations.

5 Comments on focus area 1: Moving to a circular economy

5.1 We agree with the strong focus on moving to a circular economy. The intent is sound and is recognised nationally and globally as the most contemporary and appropriate way to manage issues arising from waste generation.

We provide the following points in response to your question:

"What are the key opportunities for reducing waste, developing our resource recovery industry and shifting to a circular economy?"

5.2 We support the move to improve government procurement for using recycled or reclaimed products. We ask the government to involve local government and the NTWMG in developing training or procurement programs to promote more uptake of recycled materials.

5.3 In order to meet the intent of a circular economy, including maximising "the value and use of materials at every stage of the life of a product or material" (Draft Waste Action Plan, p.7), we ask that consideration be given to better recovery and recycling of a range of complex materials, not just those that are heavy. To achieve this, we encourage the government to consider multiple metrics to measure the success of recycling, not just weight, as discussed in section 3. A weight-only dynamic will fail to maximise the recovery of lightweight and complex materials simply because the economic incentive to recycle lighter waste is not as strong as heavier materials, such as C&D waste.

5.4 For example, glass recovered in Tasmania is generally reused only once into road base or pavers. Given that glass is infinitely recyclable, and using the principles of a circular economy, we should be seeking to maximise glass recycling back into glass packaging.
5.5 There are currently two main sources of recovered glass in Tasmania: source separated glass collected at regional transfer stations; and MRF-recovered glass from the kerbside recycling system. MRF-recovered glass is problematic and difficult to recycle back into glass packaging due to it being overly compacted and contaminated with other materials from within the kerbside recycling stream. This glass is more suited to reuse in road-base and/or construction. Glass from transfer stations, and the soon to be introduced CRS, is generally clean and colour sorted and should therefore be recycled above reuse, in line with the circular economy theory of maximising the value of materials.

5.6 Glass reprocessors, such as Owens-Illinois (O-I), seek larger quantities of high quality cullet because it reduces energy use and furnace maintenance costs due to less wear (Sustainability Victoria and the Waste Management and Resource Recovery Association of Australia 2019, p. 20). Cullet currently makes up 37% of input material in O-I's reprocessing, however, they are targeting up to 60% cullet in production and they appear open to paying for higher quality, source separated glass for use in their plants, including from Tasmania:

"These [beneficiation] plants also receive some loads sent and paid for by O-I from regional locations where freight costs are high. This includes glass into Melbourne from Tasmania. O-I pays these suppliers a rate that recognises the extra cost of freighting." (Sustainability Victoria and the Waste Management and Resource Recovery Association of Australia 2019, p. 19).

5.7 Meander Valley Council has provided colour sorted glass to O-I for ten years, at a cost to its ratepayers, as it sees this as a more productive use of what has become a single use product.

6 Comments on focus area 2: Governance

We provide the following points in response to your question:

"What are the primary waste management and resource recovery roles and responsibilities of governments, industry and the wider community?"

6.1 We believe groups like the NTWMG (and CCWS) have been leaders in Tasmania by achieving significant improvements in waste and recycling services, education and programs in the state’s north.

6.2 The NTWMG plays an important role in developing regional strategies and plans that lead to regional improvements in waste and resource recovery activities, but which also lead to greater cooperation and collaboration between councils in a given geographic area. We would like to see this role continued and expanded upon under a statewide levy.

6.3 Given the experience and successes of the NTWMG (and CCWS), we strongly believe the NTWMG should continue delivering best practice waste services regionally while also providing expert advice to government during the development of statewide policies, plans and strategies.

6.4 We believe the role of the Tasmanian Government is to set the strategic direction for waste management in Tasmania. This includes developing infrastructure plans, policies such as landfill bans, waste recovery/recycling targets, strategies for the recovery of problematic and complex materials which are not easily recovered, and procurement policies.
6.5 We ask that the state government consults extensively with the NTWMG and its member councils during any policy, plan or strategy development. The NTWMG has extensive on-the-ground experience in delivering projects, providing education and managing regional waste and recycling contracts. Northern Tasmanian councils also have significant and valuable experience in managing waste at the municipal level but also commercially through landfill and composting operations and are well placed to provide this advice to state government as needed.

**Governance arrangements under a statewide waste levy**

6.6 In order for the state government to set statewide strategic direction, and regulate and administer the statewide waste levy, it may be worth establishing or empowering a state statutory authority to have responsibility to develop statewide strategies and policies, like Green Industries SA, the NSW EPA or Sustainability Victoria. As noted above, we support waste levy funds being used by the Tasmanian Government to take the leadership role in waste and resource recovery policy, plans and strategy development while the NTWMG continues to deliver, and expand on, its successful resource recovery projects, services and education programs.

6.7 We ask the government to consider formalising the relationship between state and local government to ensure clarity of purpose and to define responsibilities of different levels of government under a statewide levy. One possibility for how this could occur is outlined as follows:

- The Tasmanian EPA’s role is broadened to enable it to lead policy, planning and strategy development, similar to the NSW EPA or Green Industries SA.
- The NTWMG (and up to another two regional waste groups) is empowered and resourced to continue delivering on behalf of member councils but to also assist with the implementation of government plans and strategies.

6.8 We ask that consideration be given to formalising the roles of waste groups, like the NTWMG, under a future statewide waste levy. We believe it is important for the NTWMG to have clarity about its ongoing resourcing and its relationship to the state government. In determining the future governance arrangements, we request that the NTWMG and its member councils be consulted with.

6.9 By formalising the role and responsibilities of the waste groups, and by committing to resourcing them from the waste levy, the government can support consistent and coordinated development of the Tasmanian resource recovery industry. Regional waste bodies like the NTWMG can then be empowered to develop and deliver regional strategies, initiatives and projects in the context of, and in alignment with, state policies.

7 Comments on focus area 3: Data, innovation networks and resource recovery targets

We provide the following points in response to your question:

"What are your key data and information needs on waste and resource recovery?"

7.1 The NTWMG currently funds cross-council data collection from major transfer stations and landfills within northern Tasmania. Councils involved in the data capture network include City of Launceston, West Tamar, Meander Valley, George Town, Northern Midlands, Break O’ Day and Dorset. The data service provision is through a company called Tasmanian Scale Company in conjunction with iWeigh, a waste database company.
7.2 Where there is a weighbridge in place at regional transfer stations and landfills, computers are integrated with the incoming weights. Transfer stations that use volume as a measure use mobile tablets. Both systems allow for printing of receipts and integrate with each council's I.T. and financial systems, assisting in streamlining the reporting and accounting systems while also allowing for more detailed reporting to the Tasmanian EPA.

7.3 The data collected includes:
- waste category
- weight or volume of materials deposited
- date of waste disposal
- site of waste disposal
- accounts
- cost of disposal.

7.4 This data is available in real time using the iWeigh waste data collection system. The data currently allows the NTWMG and its councils to look at waste disposal trends and the success of various recycling services.

7.5 The NTWMG's data needs are reasonably well met by current data arrangements, with the NTWMG having invested over $100,000 since 2017 on these systems. Nevertheless, there is scope to strengthen data collection through additional weighbridges and data collection infrastructure are some of the NTWMG's waste sites. We ask the government to review our data collection systems and potentially use these as a basis for statewide data collection and integration.

7.6 Notwithstanding the above, we believe there are data gaps from the C&I and C&D sectors. Currently there is nothing to compel reporting on recycling rates from these industries in Tasmania. The government may wish to consider using incentives to encourage full recycling reporting by these sectors by tying future loans or funding to annual data provision. Sustainability Victoria in the past has made it a condition of grant funding that industry provide data to an annual recycling industries survey.

7.7 We also believe that more clarity is required on what constitutes waste diversion and what calculations are to be used to determine waste diversion. A consistent method for determining waste diversion across Tasmania would be beneficial.

7.8 We also think there may be merit in considering using mass balance reporting across all waste sites in Tasmania to gain a better perspective of material flows across Tasmania.

How will the NTWMG’s data programs integrate with state data collection?

7.9 Many different database platforms can be customised to communicate and share data with each other.

7.10 Currently all NTWMG councils can see their own waste data and, as administrators, the NTWMG can access all seven councils' data to gain a regional perspective. After the initial set up costs there is a regional annual website database/hosting fee of $1,200 and each council also has an annual software support fee of $1,800, paid for by the NTWMG.

What information has this yielded in relation to C&D and organics, but also other waste streams?

7.11 The regional database network provides capacity to access data on green waste and C&D volumes entering a facility in real time and also allows reporting on any other customised waste type or category as required.
We provide the following points in response to your question:

"How can we best use existing research and innovation networks, or establish new networks, to help address our waste and resource recovery challenges?"

7.12 The NTWMG has an extensive library of research undertaken since 2012. These publications are listed in Appendix 1. We ask the government to consider reviewing these documents when developing statewide plans and strategies for waste services and infrastructure.

7.13 We encourage the government to review the NTWMG's landfill composition data to get baseline information on the types of waste disposed to landfill in northern Tasmania. This information may assist the government measure changes in waste composition and disposal following the introduction of a waste levy. Note the NTWMG is again undertaking landfill and transfer station audits in 2019.

7.14 We ask the government to consider supporting a broader Tasmania-wide waste forum, similar to what the NTWMG currently hosts for northern Tasmania. This Tasmania-wide forum could invite Tasmania's waste industry and local governments to hear about the latest thinking in waste and resource recovery, but also provide an opportunity to gather stakeholder feedback on waste challenges facing Tasmania. Such a forum could provide valuable information to the government on issues facing Tasmanian businesses and local governments and may help identify emerging issues, as well as providing an excellent opportunity to build networks in the waste sector.

We provide the following points in response to your question:

"What are your views and suggestions on the targets presented?"

7.15 We support the targets as listed. However, as noted in section 3, we also encourage the government to set targets for those materials which are comparatively low in weight but which have a high economic value for recovery i.e. aluminium, glass (for recycling back into glass packaging) and plastics. We also ask the government to consider using the internationally recognised waste hierarchy as a guiding principle for future waste policies.

7.16 In addition, we would like to see some specific targets for the following areas:

- Glass for remanufacture back into glass packaging, especially glass recovered through the new CRS and from transfer stations. CRS provides an excellent opportunity to collect high quality sorted glass for reprocessing and we encourage consideration of targets for glass recycling.
- Recovery of tyres for beneficial use rather than stockpiling.
- Commercial organics recovery, especially from large institutions such as hospitals, casinos and hotels.
- Commercial recycling, especially from large institutions such as hospitals, casinos, museums, UTAS and hotels.

7.17 We encourage the government to consider landfill bans as an additional mechanism to a waste levy. Both the Victorian and South Australian Governments have introduced landfill bans on all electronic waste to landfill with corresponding funding to encourage development of reprocessing. A landfill ban of electronic waste provides a clear market signal that alternatives to landfilling are required and is one way of dealing with an often problematic waste stream for which a weight-based waste levy fails to adequately deal with. Similar to the approach in South Australia, other materials for which landfill bans could be considered include whitegoods, tyres, lead acid batteries, hazardous waste, fluorescent lighting and aggregated recyclables (EPA South Australia 2017).
We provide the following points in response to your question:

"Which waste streams would provide the best opportunities to make some early progress on the proposed targets?"

7.18 As noted in section 3, C&D is the area where the government is likely to see the quickest reduction in landfill disposal rates, purely because C&D is heavy and landfill levies are most effective for heavy materials.

7.19 To encourage additional recycling from the C&D and C&I streams (including waste from skip bins), we ask the government to consider waste levy rebates for materials recovered from within a landfill's footprint and taken offsite for reuse or recycling. The City of Launceston is considering establishing a C&D/C&D recovery facility on a capped part of the landfill. Having a levy rebate for materials recovered through this facility would provide a strong economic driver for establishing the facility and lead to a significant increase in materials recovered. By volume, C&D materials make up 31% of waste to Launceston's landfill and there is potential to recover over 11,000 tonnes of C&D materials per annum through such a facility (NTWMG 2017, p.18).

Another significant opportunity for recovery comes from both household and commercial organics recovery. Blue Environment's report (2014) for the Waste Advisory Committee states that 27% of total landfilled waste by weight in Tasmania is organic material. Both the MSW and C&I sectors generate significant amounts of organic material, with 54% of landfilled MSW waste and 26% of landfilled C&I waste consisting of food and garden organics (Blue Environment 2014, p. 19). While much focus has been on recovering household organic waste, there exists a significant opportunity to recover organics from the C&I sector. We ask the government to consider:

- investing in infrastructure to enable better recovery of organic material from the C&I sector.
- providing a levy exemption for organics composted within a landfill site to encourage the C&I industry to take advantage of a lower gate rate than landfill disposal.
- regulations or legislation for mandatory organics collection and processing, potentially including landfill bans of commercial organics.

8 Comments on focus area 4: Infrastructure planning

8.1 We support the intent and stated actions of this section.

We provide the following in response to your question:

"What do you consider are the highest priority infrastructure requirements for waste management and resource recovery in Tasmania?"

8.2 We ask the state government to consider developing a state infrastructure plan to identify strategic waste infrastructure needs based on forecasts of waste generation, transport routes, economies of scale, employment and economic opportunities, material flows and proximity to final markets. South Australia’s Waste and Resource Recovery Infrastructure Plan (2018) provides an example of how state governments can provide clear direction and guidance on infrastructure investment. Importantly, this plan addresses infrastructure needs across the state as a whole but also on a region-by-region basis.

8.3 In the absence of a strategic statewide plan, it is difficult to adequately identify the highest priority infrastructure requirements or to assess the requisite land use planning requirements associated with different waste infrastructure.

8.4 Notwithstanding the above, the NTWMG considers the following as high priority for infrastructure investment in northern Tasmania based on our own analysis from reports commissioned:
• C&I/C&D recovery at the LWC through a new purpose built facility.
• Small scale enclosed food and garden organics processing at council waste sites.
• Tyre recovery and reprocessing. In June 2019, the City of Launceston received a grant to recover tyres. Over eight days, over 2,400 tyres were dropped off for free at the LWC. This project exceeded expectations and demonstrated an unmet need for better tyre recovery and recycling. It also demonstrated that people want to do the right thing but they need the right incentive to do it. Anecdotally we are aware that a Tasmanian tyre reprocessor is struggling with tyre stockpiles and demand in the north, further strengthening the need for a strategic approach to tyre recovery.
• Permanent collection sites for high volume low toxicity household hazardous waste at major transfer stations across Tasmania.
• Funding to enable frequent collection days for high toxicity low volume chemicals across Tasmania.
• Upgrading major transfer stations across Tasmania to the NTWMG and CCWS's Transfer Station Best Practice Guidelines (2014b) and ensuring that all transfer stations offer a minimum service for recycling common materials including paints, batteries and soft plastics.
• Infrastructure support for large C&I businesses to recover food organics, including support for appropriate collection infrastructure at places such as tertiary institutions, hospitals, casinos, hotels and museums.
• Soft/film plastics collection for local reprocessing.
• Ensuring all materials recovery facilities (MRFs) in Tasmania operate to best practice and recover the same materials to facilitate consistent messaging about what can and cannot be recycled. This is especially important given Tasmania's small population and would make it easier to achieve economies of scale with infrastructure and education.
• Support for weighbridges and other data improvements including standardising waste type and volume capture using mobile waste database data systems for transfer stations, similar to what NTWMG has provided funding towards.

9 Comments on focus area 5: Supporting resource recovery across industry

9.1 We support the intent and stated actions of this section.

We provide the following in response to your question:

"How can governments, businesses and the community best support the development of resource recovery in Tasmania?"

9.2 The NTWMG believes the best way to support the development of resource recovery in Tasmania is the commencement of a waste levy which is hypothecated and reinvested into the waste and recycling industry.

9.3 The NTWMG also believes resource recovery in Tasmania would be best supported by clear and strategic policy and plans developed by the state government on waste and resource recovery infrastructure and services. We think the Tasmanian resource recovery sector would benefit from increased resources for strategic waste policy development and planning within the EPA (or another state statutory body similar to Green Industries SA, NSW EPA or Sustainability Victoria).
9.4 The NTWMG also believes it provides a critical role in facilitating resource recovery within councils and businesses in northern Tasmania. As noted by Blue Environment (2014, p.32), the waste groups, including the NTWMG, “provide an important conduit for coordination of waste and resource issues between state government regulation and local government implementation”.

9.5 We encourage the government to formally acknowledge the importance of regional bodies like the NTWMG in delivering waste management and resource recovery services, education and innovation on behalf of their member councils in Tasmania.

9.6 Similar to Victoria and NSW, we ask the government to consider formalising the regional waste groups and resourcing them appropriately through the proposed statewide waste levy. Such an approach would build on NTWMG's successes, including:

- an annual grants program. Grant recipients have included Environex which now takes soft plastics from across Tasmania for recycling back into new products.
- funding the purchase of a polystyrene extruder at the LWC. The NTWMG also funds the transport of polystyrene from regional transfer stations in northern Tasmania to the LWC. By funding transport costs, the NTWMG is able to facilitate additional recycling from smaller regional and rural councils that might otherwise not have the resources to offer. The government, if a waste levy is introduced, could consider subsidising transport costs for small rural and regional councils to support the development of resource recovery in Tasmania, as is done by Green Industries SA.
- facilitating e-waste, domestic battery and paint collections across six member councils.
- developing the Rethink Waste Tasmania website in collaboration with CCWS, which provides a one-stop portal of information on how households, schools and businesses can improve their resource recovery activities.
- developing the joint NTWMG/CCWS Tasmanian Waste Management Communications Plan 2017–2022 (see Appendix 3)
- educating households to recycle better through the daily household recycling assessment program. If households are better at recycling, the quality of materials increases which builds resilience in the Tasmanian resource recovery industry.

9.7 In addition to the development of a Tasmanian Market Development Study, we encourage the employment of a Tasmanian Market Development Officer to develop markets for recovered materials. Or, as an alternative, that the NTWMG is empowered and funded to undertake market development, as per Victorian Waste and Resource Recovery Groups.

10 Comments on focus area 6: Education and community engagement

10.1 The NTWMG believes the kerbside recycling system within its region is as good as those offered on the mainland. Indeed, with the City of Launceston and West Tamar Council adopting FOGO collections, it could be argued our kerbside recycling system is as good, if not better, than what is offered across a large part of mainland Australia.

10.2 A statewide waste levy should build on successes achieved by the NTWMG to enable further community education, particularly of households. A report into Australia's recycling system states that waste levies have a limited impact on reducing waste generated by households because households are charged a flat fee for waste disposal through their rates and no financial benefit is gained through reducing waste (Senate and Environment and Communications References Committee 2018, p. 51-52).
10.3 Additionally, recent analysis by JP Morgan on Australia’s recycling system states “householders largely do a poor job at allocating various waste items into the correct bin for kerbside pick-up, and this makes it hard for the economics to stack up further on in the waste-processing chain” (Evans 2019).

10.4 We encourage the government to continue support for the NTWMG’s education role and that it considers broadening kerbside education across Tasmania, similar to what is already offered by the NTWMG through its daily kerbside recycling bin assessment program. Since 2013, the NTWMG kerbside officers have assessed 61.5% of households (or 35,830 households) in northern Tasmania. Each household is provided extensive, tailored education on how to improve their recycling. In addition, the kerbside officers have:

- visited over 60 schools (primary and secondary) and child care centres across north and north west Tasmania
- spoken to over 30 community groups about how to recycle better at home
- hosted stalls at festivals and shows across the state, including at Agfest, the Longford Show and Tamar NRM Expo
- undertaken waste audits at NTWMG schools
- set up static kerbside recycling displays at member council offices and at shopping centres
- worked with real estate agents to provide information on recycling for tenants.

10.5 We believe there should be consistent messaging on what can and cannot go into kerbside bins across all of Tasmania rather than by geographic area. This may help deal with some of the economies of scale issues and help build resilience in the recycling sector through achieving better quality product.

We provide the following in response to your question:

"Are you aware of any existing education materials that could be adapted for the Tasmanian context?

10.6 The NTWMG has already developed extensive education materials for the Tasmanian context. The Rethink Waste website has fact sheets and general information for how to reduce and recover waste from businesses, households, schools and while out and about. Further, the NTWMG has its own Rethink Waste Schools Program which was developed especially for Tasmania.

10.7 Further resources should be invested in more targeted education of businesses to help them better understand their waste impacts and how to reduce them.

10.8 Additionally, in light of China’s National Sword policy, and in the context of JP Morgan’s aforementioned analysis, we believe further resources could go into helping households become better recyclers to build more resilience into the kerbside recycling system. We therefore ask that consideration be given to:

- adopting statewide consistent plain language around what can and cannot be recycled. According to Sustainability Victoria (2014), there are several waste and recycling terms which are not well understood in the community. These include: organics, commingled, residual waste, contamination, biodegradable, hard plastic, and soft plastic. While this study concerned Victorians, we have anecdotally heard of similar confusion about what different terms mean while undertaking our kerbside recycling bin assessments.
- undertaking Tasmanian-based social research into community attitudes and drivers towards recycling to inform more targeted statewide education campaigns.
- a statewide advertising campaign (radio, print, TV, social media) to educate households on how to recycle right.
- developing targeted information for businesses, both small to medium enterprises and large businesses, on how to recycle and procure products that contain recycled materials and that are easily recyclable.
- developing protocols for recycling from events in Tasmania. Tasmania has several high profile events including Taste of Tasmania and Festivale that attract thousands of visitors. We ask that consideration be given to statewide guidelines to maximise event recycling.
- building on the success of NTWMG’s recycling signage project by rolling out consistent public place and transfer station signage across all of Tasmania.

11 Comments on focus area 7: State and national policy and regulatory settings

11.1 We support the intent and stated actions of this section.

We provide the following in response to your question:

"Which policy or regulatory settings will help us achieve the targets in this plan and help stimulate the resource recovery industry?"

11.2 As noted in sections 6 and 9, we ask the Tasmanian Government to consider either empowering the EPA or establishing a body similar to Green Industries SA to develop statewide waste and resource recovery policies, plans and strategies.

11.3 We ask the Tasmanian Government to clearly articulate the roles of state government, the regional waste groups (including the NTWMG) and local government for delivering better resource recovery across Tasmania.

11.4 We request that the government consults with the NTWMG and its member councils on any amendments to the Environmental Management and Pollution Control regulations and Act.
Appendix 1

Forecast NTWMG income & expenditure

Median annual tonnes to Launceston Waste Centre since 2013/14: 95,274 tonnes

<table>
<thead>
<tr>
<th></th>
<th>Forecast levy at $7.50/t in 2019/20</th>
<th>Forecast levy at $10/tonne in 2021/22</th>
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<tr>
<td></td>
<td>$714,555</td>
<td>$952,740</td>
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NTWMG 2019/20 budget

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<tr>
<th>Item</th>
<th>NTWMG Projects 2019/20</th>
<th>Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Priority waste theme: Organics</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1.1 Regional organics kitchen caddies</td>
<td></td>
<td>$ -</td>
</tr>
<tr>
<td>1.2 Regional organics education</td>
<td></td>
<td>$ -</td>
</tr>
<tr>
<td>2 Priority waste theme: C&amp;D recovery and reprocessing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.1 C&amp;D recovery: business case and infrastructure</td>
<td></td>
<td>$ 25,000</td>
</tr>
<tr>
<td>3 Priority waste theme: Household hazardous waste</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.1 Household hazardous waste biennial collection</td>
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<td>$ 50,000</td>
</tr>
<tr>
<td>3.2 Domestic batteries collections</td>
<td></td>
<td>$ 15,914</td>
</tr>
<tr>
<td>3.3 Paint collection</td>
<td></td>
<td>$ -</td>
</tr>
<tr>
<td>3.4 Fluorescent light collection</td>
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<td>4 Priority waste theme: Problem wastes</td>
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<td></td>
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<tr>
<td>4.1 E-waste collection</td>
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<tr>
<td>4.2 Glass recovery from transfer stations</td>
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<td>$ 5,000</td>
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<tr>
<td>NEW Soft Plastics recycling trial</td>
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<td>NEW CD &amp; DVD recycling</td>
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<tr>
<td>NEW Polystyrene trial/recycling</td>
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<td>5 Priority waste theme: Transfer station and data improvements</td>
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<tr>
<td>5.1 NTWMG transfer station infrastructure upgrades</td>
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<td>5.2 Waste charging and consistent services</td>
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<td>5.3 Kerbside waste composition audits (4 yearly)</td>
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<td>5.4 Landfill and transfer station composition audits (4 yearly)</td>
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<td>5.5 Data collection - expansion to satellite transfer stations</td>
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<td>$ 252,000</td>
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<td>6</td>
<td><strong>Priority waste theme: Kerbside recycling assessments and community education</strong></td>
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<td>6.1</td>
<td>Kerbside recycling bin assessments and community/school education - salaries</td>
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<td>Kerbside recycling bin assessment program - materials and training</td>
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<td>Community events and displays</td>
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<th><strong>Priority waste theme: Share information about waste and recycling and raise awareness about the NTWMG</strong></th>
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<tbody>
<tr>
<td>7.1</td>
<td>Regional/cross regional communications and education</td>
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<td>7.2</td>
<td>Website management</td>
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<td>7.3</td>
<td>Waste NoT Awards</td>
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<td>7.4</td>
<td>Garage Sale Trail</td>
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<td>7.5</td>
<td>Recycle Coach phone app</td>
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<td>7.6</td>
<td>Local government waste forum - biennial</td>
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<tr>
<td><strong>Total</strong></td>
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<tr>
<th>8</th>
<th><strong>Priority waste theme: Events, litter and illegal dumping</strong></th>
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</thead>
<tbody>
<tr>
<td>8.1</td>
<td>Event recycling - the right bins at the right place</td>
</tr>
<tr>
<td>8.2</td>
<td>Litter and illegal dumping hotspots, including PPR bins</td>
</tr>
<tr>
<td>8.3</td>
<td>Illegal dumping strategy advocacy</td>
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<tr>
<td><strong>Total</strong></td>
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<thead>
<tr>
<th>9</th>
<th><strong>Resource recovery grants (covers organics; transfer station improvements; C&amp;D priority waste themes)</strong></th>
</tr>
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<tbody>
<tr>
<td>9.1</td>
<td>NTWMG resource recovery grants program</td>
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<td><strong>Total</strong></td>
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<th><strong>Administration</strong></th>
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<tr>
<td>10.1</td>
<td>Staffing x 2 P/T (equiv. to 1 FTE @ 50% NTWMG/50% CoL)</td>
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<tr>
<td>10.2</td>
<td>Training and conferences</td>
</tr>
<tr>
<td>10.3</td>
<td>Annual report and budget</td>
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<tr>
<td>10.4</td>
<td>Strategy mid-term review</td>
</tr>
<tr>
<td>10.5</td>
<td>Annual levy collection and administration charge</td>
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<tr>
<td><strong>Total</strong></td>
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</tbody>
</table>

**TOTAL ALL PROJECTS** | $795,663 |
13 Appendix 2

NTWMG consultancies and reports 2011–2019

1. APC Environmental Management 2011, Landfill Audit for the Northern Tasmanian Waste Management Group and Cradle Coast Authority

2. APC Environmental Management 2012, Service Level Strategies for Northern Tasmanian Waste Management Group

3. APC Environmental Management 2012, NTWMG 5 year strategy 2012–2017

4. Blue Environment 2013, Regional waste management and resource recovery pricing policy

5. Blue Environment 2014, Transfer Station Best Practice Guidelines

6. Blue Environment 2016, Northern Tasmanian Transfer Station Assessments


8. DJR Environmental 2012, NTWMG Organics Facility Feasibility Study

9. EC Sustainable 2014, NTWMG Residential Kerbside Bin Audit

10. Hyder Consulting 2014, C&D Management in the North and North West of Tasmania

13 References


Cradle Coast Waste Management Group & Northern Tasmanian Waste Management Group 2014b, *Transfer Station Best Practice Guidelines*, report prepared by Blue Environment, CCWMG, Devonport & NTWMG, Launceston


Environment Protection Authority Victoria 2016, *Calculating the landfill levy and recycling rebates*, EPA Victoria, Carlton


Senate Environment and Communications References Committee 2018, *Never waste a crisis: the waste and recycling industry in Australia*, SECRC, Canberra

Sustainability Victoria 2014, *Drivers and barriers affecting kerbside recycling behaviour in Victorian Households in 2014*, Sustainability Victoria, Melbourne

Cited legislation and regulations

Green Industries SA Act 2004 (SA)

Protection of the Environment Operations (Waste) Regulation 2014 (NSW)