Draft Waste Action Plan Consultation Summary

Summary of feedback received from public consultation

Department of Primary Industries, Parks, Water and Environment

Tasmanian Government

Contents

This summary report does not necessarily represent Tasmanian Government policy or its views on waste management and resource recovery.

Executive Summary

The 2019 draft Tasmanian Waste Action Plan (WAP) was released in June 2019 for public consultation. Submissions closed on 7 October 2019 with 66 responses received. Across the submissions received, responses were overwhelmingly supportive of all key areas of the WAP. The benefits of moving to a Circular Economy (CE) were recognised. The environmental benefits of keeping resources in circulation and out of landfill, and the economic benefits of local resource recovery industry expansion and associated job creation were addressed in multiple submissions.

Submissions noted that Tasmania already has a strong reuse culture. Several businesses and community groups responded with suggestions to grow their existing resource recovery services or noted available resource recovery technologies for investment. Government policy was seen as an important driver of the CE, with repeated calls to phase out single use plastics, banning certain waste streams from landfill, develop consistent recycling labelling and procurement policies that mandate the use of recycled content.

A statewide waste levy was acknowledged as the major financial lever needed to both incentivise behavioural change and to fund resource recovery initiatives. Submissions were concerned with the detail of the waste levy. Several advocated for a relatively high levy rate, with incremental increases through time so that the levy begins at a level that industry and local government can adapt to relatively quickly, but ending up at a rate that stimulates ongoing and sustainable diversion from landfill. Respondents noted the experience of other jurisdictions, demonstrating that a waste levy rate needs to be substantial to deter disposal to landfill.

Local Government and some other stakeholders expressed a preference for the hypothecation[1] of levy funding and strategic oversight by an appropriate governance body. Industry stakeholders supported hypothecation, but indicated that governance of the funding and other resource recovery functions should primarily be the responsibility of the State Government, with an appropriate level of advisory input from a wide range of stakeholders. It was recommended that levy funds be deposited into a separate "Innovation Fund" to support the growth of the resource recovery industry, to support innovation, education and research, and to expand the work that regional waste management groups are already doing.

Submissions supported a statewide Infrastructure Plan being developed, informed by market research and with the input of industry and local council. Priority areas for investment were identified, which included the infrastructure needed for the administration of the waste levy and Container Refund Scheme (CRS), the expansion of resource recovery processing facilities, and the development of domestic markets for recycled product. There was also strong support for prioritising organics processing facilities and kerbside Food Organics and Garden Organics (FOGO) collection.

Respondents identified the need for community engagement, with a major education campaign recommended to engage individuals, businesses and schools in good waste management and resource recovery practices. Two important areas suggested are funding education programs focused on properly sorting recycling (only putting in those bins what can be recycled to avoid contamination) and promoting the uptake of recycled products. Other views presented in the submissions concerned economies of scale for recyclates, how the levy and CRS can be applied equitably statewide, landfill legacy issues, dealing with hazardous waste and waste stockpiles and also how to address the potential for perverse outcomes (e.g. illegal dumping of waste).

[1] Hypothecation is the specific allocation of a particular stream of revenue to a particular regime of expenditure: in this case, to waste management and resource recovery activities in Tasmania.

Introduction

The Draft Waste Action Plan provides a framework for discussion with local government, businesses and the community on the best way to address the waste and resource recovery challenges that face Tasmania. It identifies actions the Tasmanian Government intends to take to tackle our waste and recycling problems, in particular the Government's commitment to replace the current voluntary regional council waste levies with a legislated statewide waste levy, and to introduce a Container Refund Scheme (CRS) in Tasmania.

In developing the Draft Waste Action Plan, the Tasmanian Government considered the views expressed by local government, industry and the community in recent years, and conducted targeted consultation.

The Plan sets out the following key actions and targets:

- Encourage resource recovery by introducing a waste levy by 2021 to fund waste management and resource recovery initiatives and help divert waste from landfill;
- Introduce a CRS in Tasmania by the end of 2022;
- Ensure 100% of packaging is reusable, recyclable or compostable by 2025;
- Reduce waste generated in Tasmania by 5% per person by 2025 and 10% by 2030;
- Achieve a 40% average recovery rate from all waste streams by 2025 and 80% by 2030;
- Have the lowest incidence of littering in the country by 2023;
- Work at the national level and with local government and businesses in Tasmania to phase out problematic and unnecessary plastics by 2030; and
- Reduce the volume of organic waste sent to landfill by 25% by 2025 and 50% by 2030.

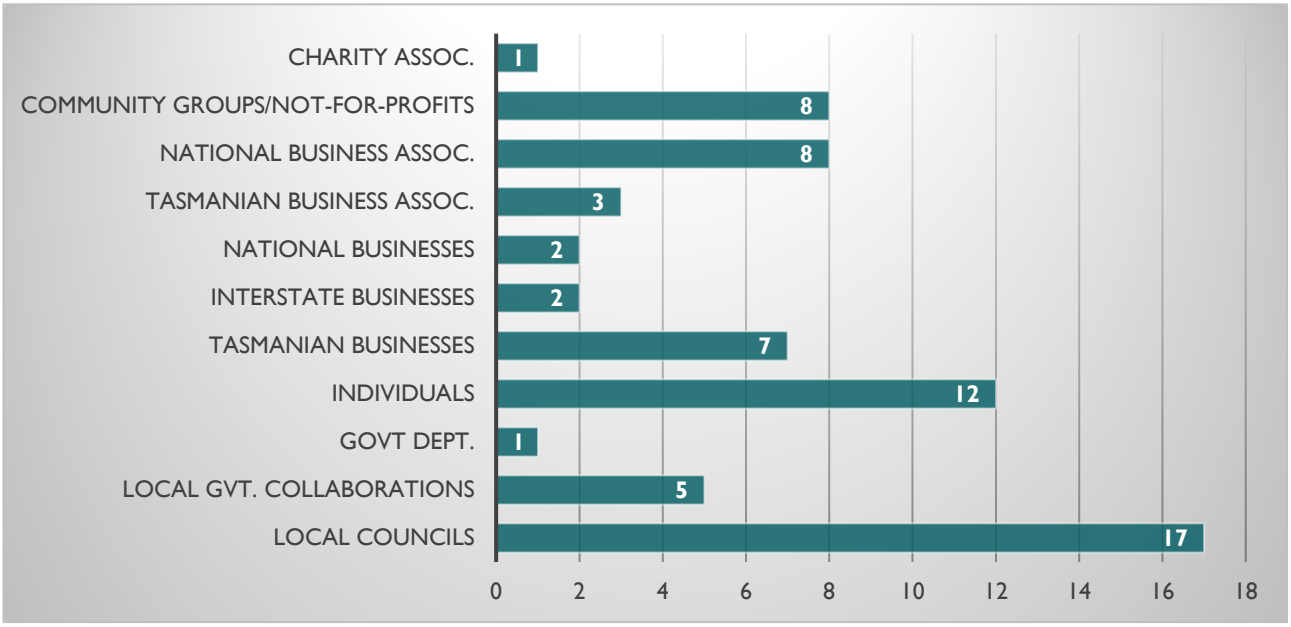
The Draft Waste Action Plan identifies seven priority themes or Focus Areas that are broadly aligned with the commitments made in the April 2018 Meeting of Environment Ministers (MEM) and the strategies detailed in the *2018 National Waste Policy*. These Focus Areas aim to address priority waste issues and are listed below:

1. Moving to a Circular Economy
2. Governance
3. Data, Targets, and Innovation Networks
4. Infrastructure Planning
5. Support for the Resource Recovery Industry
6. Education and Community Engagement
7. State and National Policy and Regulatory settings

The Draft Waste Action Plan was released for public comment on 29 June 2019. Individuals and organisations wishing to make submissions on the Draft Waste Action Plan were encouraged to comment on each of the Focus Areas together with any other relevant feedback. Public consultation closed on 7 October 2019 with a total of 66 submissions received.

Local councils made a total of 17 submissions, making it the largest single group of respondents. Submissions were also received from local council collaborations, individuals, businesses and business associations, not-for-profit and community groups. Table 1 provides a breakdown of submissions. A list of all public submissions is provided in Appendix 1.

Table 1: Number of submissions by relevant group



This document summarises the comments, suggestions and ideas outlined in the public submissions received, in relation to the key actions, targets and Focus Areas. Some of the suggestions and responses were made or supported by multiple submissions, while others were addressed in a few or single submissions. All relevant feedback will be carefully considered during the finalisation of the Waste Action Plan.

DPIPWE wishes to acknowledge and thank all the respondents who took the time to provide valuable input and insights into the draft Waste Action Plan for Tasmania.

Growing Resource Recovery in Tasmania

1. Statewide Waste Levy

Responses to the draft Waste Action Plan (WAP) were overwhelmingly supportive of the introduction of a waste levy. It was commonly described in submissions as a useful financial lever to drive the diversion of waste from landfill as well as supplying the funds to support the waste sector in important areas of work such as community education, research and development, and resource recovery initiatives.

One qualification expressed to implementing a statewide waste levy is concern over how it can be applied equitably to remote areas in Tasmania. Due to their relative isolation, these areas may suffer a "double hit" in the sense of already having increased costs and limited options for resource recovery, which make it difficult to avoid sending waste to landfill and incurring the levy. Careful planning is needed to address economies of scale, both for Tasmania generally and for particular remote communities.

Submissions referred to the benefits of the waste levy targeting high volume waste, such as construction and demolition waste. However, some drawbacks to charging by weight were noted. Firstly, it prioritises recovery of heavy materials over lighter but potentially more valuable materials (such as glass or aluminium). Secondly, it does not reward individuals who reduce their domestic waste, as councils will apply the same increase in rates across the board. The Container Refund Scheme (CRS) could go some way to address this, by rewarding residents who take their glass beverage containers to a CRS collection point rather than 'giving' their refund to councils through their kerbside recycling. Glass bottles make up around 40% of kerbside recycling.

Feedback on the WAP had a clear view that the success of the levy depends on available alternatives to landfill, with all levels of government having a role in encouraging markets for recycled/repurposed material diverted from landfill. Suggestions included legislative and policy guidelines on purchasing of recycled content and banning certain materials from landfill such as batteries, fluorescent lighting, e-waste, whitegoods and tyres – as has occurred in Victoria and South Australia.

There were several repeated themes in the responses indicating that the main concerns are: the waste levy rate and that it is set at a high-enough level to encourage diversion from landfill: hypothecation of funds; governance of the levy; prevention of perverse outcomes; and support for local government and industry to implement the levy.

The majority of respondents who commented on the levy rate encouraged a high rate being set, with reference to the rates in mainland jurisdictions and research findings that indicate that the rate needs to be substantial to effect behavioural change. An amount as high as $120 per tonne was suggested, but most respondents advocated a levy around $50-60 per tonne. This would make Tasmania's levy comparable with mainland regional rates (submissions noted this to be between $33 and $82.70 per tonne.) An incremental approach is generally supported, starting at a lower levy rate and increasing to the desired amount over time. It was suggested that this could be done by having set increases legislated, which would provide notice to everyone, but especially to councils, landfill operators and businesses that will need to make administrative arrangements for the increased cost.

Most respondents considered there to be insufficient justification for a differential levy rate between metro and rural Tasmania, the exception being for small or remote council areas, who were concerned they would end up paying the same flat rate as metro areas, but receive little of that funding back in investment or equalisation of transport costs.

The majority of submissions indicated that most of the levy should be allocated to supporting resource recovery and waste management activities in Tasmania (i.e. waste levy hypothecation). Some responses recommended allocating a proportion of the funds for the administration of the levy to ensure that it is managed and regulated effectively, and that there is a good level of compliance and enforcement activity to minimise adverse impacts from the introduction of a levy, such as illegal dumping. Some respondents recommended that the money raised go to an Innovation Fund, rather than into government consolidated revenue. There is strong support for the continued funding of regional waste management groups from levy funding.

In regards to levy governance arrangements, submissions expressed a strong preference for a dedicated organisation or authority to manage the levy, perhaps based on the South Australian model (Green Industries SA). It was suggested that this separate body could have representation from industry groups and local councils. Industry supported the idea of hypothecation but also made the point that any governing body should have advisory input from a broad range of resource recovery interests and that the primary governance of funding should remain with the State Government.

There are a number of known perverse outcomes from imposition of a waste levy. Respondents cited the experience in mainland jurisdictions where an increase in illegal dumping activity, stockpiling of waste and fraudulent classification of waste aimed at levy avoidance has occurred. Respondents recommended a robust compliance and enforcement regime, and that early consideration in the levy planning stages be given to strategies to avoid perverse outcomes. Respondents also recommended exempting some wastes from the levy, such as asbestos, where there is a public interest in it being properly disposed of.

Concern was raised in the submissions for small and regional landfills. It was expressed as important that they remain viable, however many do not have a weighbridge or records system necessary for the administration of a waste levy. It was suggested that required improvements might be able to be funded from the levy itself, although some respondents were concerned that they will be disadvantaged by having invested early in the infrastructure themselves. Consideration of administration costs for sites generally was recommended, with the costs of administering the levy likely to increase gate fees on top of the levy itself.

Charitable organisations strongly recommended an exemption from the levy or discount for charitable waste (e.g. waste derived from donations that cannot be used or the dumping of waste at donation sites). Otherwise charitable groups are likely to be unfairly impacted to the detriment of the services they provide to the community.

A rebate process was suggested for waste that is recovered from landfill for reprocessing. This is in line with Victoria's levy system and submissions noted that it furthers the aims of the Circular Economy (CE) by providing an incentive to landfill operators to divert as much material as possible from landfill.

Finally, there is widespread support for consultation with industry in the levy planning stages, such as by the establishment of an advisory group of stakeholders.

2. Container Refund Scheme

The Tasmanian Government's proposal to introduce a beverage Container Refund Scheme (CRS) was supported in the majority of submissions.

Many of these submissions identified the potential benefits of a CRS, which include increased resource recovery, a reduction in litter, increased community awareness and involvement in waste management and recycling, and opportunities for jobs.

A few submissions expressed doubts about Tasmania's capacity to locally process the volumes of recyclable material produced by a CRS, identifying that the introduction of a CRS would need to operate hand in hand with the expansion of local resource recovery processing and the development of domestic markets for the recycled product.

The other main area of concern was the issue of equitable revenue sharing. There are many points of collection for recyclable materials (e.g. kerbside, transfer stations, resource recovery stations, and independent contractors who collect and transport waste materials). This raises the question of who 'owns' and should receive the refund for eligible containers? Alternatively, should the refund be shared between all those involved in the supply chain?

A few common themes on the CRS arose in the submissions:

- It should be self-funded, and not subsidised by the waste levy;
- It should be nationally consistent, e.g. in terms of products included, refund amounts and marketing of the scheme;
- There is potential to expand to a broader range of eligible containers, for example including wine bottles;
- It needs to operate in conjunction with moves to reduce packaging generally;
- The NSW approach was referred to as best practice, particularly since it makes the CRS available to a broader section of the community.

An issue raised in some submissions was the management of unreturned and 'unreturnable' beverage containers (e.g. broken bottles or those incorrectly disposed of). It was suggested that CRS coordinators in other jurisdictions had drawn 'huge profits' from these unclaimed refunds, and that Tasmania should better manage that to ensure that the refund the consumer has pre-paid for when purchasing the beverage is instead collected for resource recovery work.

To ensure the success of the CRS, respondents recommended collection depots be conveniently placed in the community to make it easy for people to commit to habitually returning their eligible recycling. Feedback noted an opportunity to utilise existing infrastructure at transfer and recycling stations as collection points for the scheme. It was noted the CRS could also be a profitable income stream for Scout groups and other not-for-profit organisations, which would also have the effect of placing more collection points in the community and increasing community involvement.

Focus Areas and Actions

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

Most respondents were supportive of planning for a transition to a Circular Economy (CE) and noted that Tasmania, as an island with an existing reuse culture and small business culture with innovative thinkers, is well-placed. Many noted that expansion of the resource recovery industry will have a positive effect on employment. For every 10,000 tonnes of waste recycled, 9.2 jobs are created compared with 2.8 jobs from landfilling.

Some submissions applied an Ellen MacArthur Foundation definition of the CE, which is based on the principles of designing out waste and pollution, keeping products and materials in use, and regenerating natural systems. This is consistent with the more traditionally used waste hierarchy concept where the preference is to avoid generation of waste in the first place (avoid overconsumption), then reusing, recycling, reprocessing, recovering energy, with disposal the last preference.

Responders made varied suggestions for incentives, policies and methods to manage the waste hierarchy, including:

- Ban some waste streams from going to landfill, and require these to be recycled instead;
- Keep the cost of reusing local recycled goods lower than importing a new product;
- Develop a cost effective system for materials collection and local, regional and national processing plants;
- Consistent labelling to help with recycling;
- Adjust government procurement policies so these require use of goods with a recycled content;
- Maximise the value and use of materials at every stage of a product's life, and consider better recovery and recycling of a range of materials. For example, recycling glass back into glass packaging for continuous recycling and eliminating the need for virgin materials in production, instead of glass being crushed for processing into pavers or road base which, while removing glass from landfill, means that new glass is needed for packaging products;
- Phase out single use plastics, and move to use and recover packaging.

Some industry submissions were less concerned with the CE, but instead focussed on use of stockpiles of recyclables so that they are no longer a hazard, and don't go into landfill. Using glass or tyres in road surfacing was provided as an example.

Some respondents were concerned about industries securing a position on deriving energy from waste and removing a resource too quickly from the waste hierarchy pathway.

Others suggested preventing waste in the first place and giving incentives to businesses to help them achieve waste reduction targets.

Significant support was expressed for using existing networks of innovation and CE practitioners in Tasmania to assist with the transition.

Product Stewardship and Extended Producer Responsibility was commonly raised as a means of building CE principles into the design and use and reuse of products.

It was understood by respondents that loans and grant schemes could provide assistance for small business to accelerate their recycling capacity, and support the further development of local industries needed to produce products from locally sourced recycled materials.

A number of respondents who work in waste management requested a whole-of-government, industry and community approach or framework for CE. It was suggested that a roadmap be developed to outline a transition phase towards a CE, outlining which producers and manufacturers would be targeted to shift from linear to circular. Submissions have suggested that it may be possible for the manufacturing industry to extend current offerings to access or create new markets in secondary products. Collaboration across the supply chain between importers and manufacturers and those who collect and process goods for recirculation was recognised as important.

2. Governance

A common theme in the feedback from local government stakeholders was that the levy governance body should have a level of independence from State Government and include representatives from existing waste management groups, Councils and waste industry stakeholders and experts.

Some respondents, in recognising the dispersed population in Tasmania, recommended that local government or regional waste management groups be involved in the governance structure and that the location of the governance body should be regionally rather than Hobart-based to reflect and cater for statewide needs. A few respondents expressed support for the type of governance body outlined in the LGAT-commissioned *Feasibility Study into a Statewide Waste Management Arrangement.* This recommended a formal shared collaborative structure, co-owned by and accountable to State and Local Government, with co-investment from State and Local government.

The South Australian governance model was raised in many submissions as a good example to follow – noting Green Industries SA as a separate authority for developing and managing waste and resource recovery policy, including distribution of waste levy funds through grants and loan schemes.

Industry representations indicated that the governance body and governance of the levy should primarily be the responsibility of State Government, with appropriate structures being put in place to ensure a wide range of stakeholder interests are considered.

Submissions recommended that the body provide a range of strategic statewide functions, covering matters such as:

- Infrastructure plans;
- Resource recovery targets;
- Development of data management systems;
- Grant and loans management and probity;
- Decreasing contamination in kerbside sources of materials through education and increasing industry capacity to sort and recover materials from comingled kerbside sources;
- Procurement policies;
- Supporting Councils to introduce FOGO;
- Delivery of existing waste programs and activities;

- Guidelines to ensure a high proportion of levy funds is allocated to on-ground waste management systems and solutions, not including landfill problems or legacy issues;
- The development of policy, legislation and regulations for transport and storage of waste.

Another theme, particularly from industry, was that levy governance arrangements could help to reduce market failure and reduce risk, for example via the governance body playing a role in:

- Mandating the use of stockpiled waste in products;
- Supporting the development of commercial agreements to reuse stockpiled resources;
- Providing financial guarantees for industry bodies while they find their feet in new market development and early product development (support for pilot programs);
- Locating recycling and recovery activities close to markets;
- Allowing collaborative procurement to assist economies of scale.

Council submissions focused on governance roles included setting pricing mechanisms to capture the real costs of managing waste materials, creating market conditions to be both environmentally and financially viable and increasing public place recycling.

A number of respondents also thought levy governance should play a role in ensuring equitable distribution of levy funds. Issues raised included making sure there is a level playing field, and that a waste resource is not monopolised and removed from the waste hierarchy too quickly, and ensuring levy funds are not just available for newcomers, or to the exclusion of established enterprises which have already invested and have infrastructure.

3. Data, Innovation Networks and Resource Recovery Targets

Many respondents agreed with the need to standardise data collection, and recognised the difficulty in finding a system that suits each council. For example, while the NSW model of mandatory weighbridges provides the most accurate and robust data to date, not every Tasmanian council has a weighbridge. However, successful data collection by suppliers contracted to collect recyclables at council Waste Transfer Stations is evident, and there are systems in use in other jurisdictions where weighbridges are not available everywhere.

Recycling and resource recovery businesses can also provide statistics on what is being recycled, where it is being sent and what it is used for, including via waste audits.

One submission from a council-industry collaboration provided an outline of their data collection system, with weighbridges integrated with computers and waste transfer station operators using tablets to enter data. Receipts can be printed, and the data is integrated with council IT and financial systems. Reporting to the EPA is also achievable. This system can obtain real time data on construction and demolition, and green waste in their area.

Numerous respondents agreed that good baseline data is needed to monitor the achievement of any target.

Several respondents indicated that, targets would be best achieved by creating a genuinely circular economy where the market drives demand for more recycled products. Private investment can be encouraged by providing more robust data on available feedstocks and material streams and also by the funding of research and development projects through the waste levy.

A recycled materials register was suggested to promote the secondary market and help link manufacturers, retailers and consumers. This could potentially look like an online virtual market place of sustainable products.

Submissions noted that standardising terminology is also important. For example, does hard waste mean construction and demolition waste or glass and plastics?

Submissions recommended that state resource recovery and waste reduction targets be consistent with national targets

The most commonly mentioned waste to target early was domestic and commercial food waste. Submissions suggested that food waste accounts for between 35-40% of waste going to council landfill and makes resource recovery difficult because recyclable materials can become contaminated with organic waste, as happens when household waste is unsorted. Strong arguments were made for expanding kerbside FOGO bins statewide and increasing regional processing facilities. Some submissions have suggested that a target of 100% reduction of organic waste from landfill is achievable.

Submissions also raised extracting methane from food waste to reduce greenhouse gases by use of anaerobic processes.

The best opportunities for early progress in waste reduction and/or resource recovery identified by respondents were:

- Domestic/kerbside/commercial FOGO
- Single use plastics
- Public place recycling
- Divert construction and demolition waste from landfill
- Rural silage wrap/netting
- End of life tyres
- Primary production (i.e. food waste from off spec fruit and vegetables, trimmings, etc.)
- Energy from waste
- Glass
- Polypipe recycling
- Polystyrene recycling

The highest priority identified by some respondents is a recycling sorting facility in the south, as the Container Refund Scheme will create demand and volume. It was also stressed that a detailed market assessment is required to understand the nature of long-term sustainable end use markets.

Respondents expressed variable opinions on use of crushed glass, plastics and shredded tyres in road surfaces. Some supported this use because of benefits to industry while others thought it removes a product from the waste hierarchy too early.

4. Infrastructure Planning

There was general support in the submissions for the development of a statewide Infrastructure Plan. There was strong interest from local councils to be involved in infrastructure planning, although some respondents emphasised the importance of investment in independent businesses as well.

Several respondents identified investment opportunities for installation of recovery technologies in their existing businesses, including:

- Anaerobic digestion technology (biogas);
- Energy from waste (power generation);
- Thermal treatment of waste for fuel;
- Recovery of recyclables; and
- Pelletisation of green waste for fuel.

One respondent suggested the Infrastructure Plan could include complementary "non-infrastructure" investment, such as supply mapping to identify business and development opportunities, and investing in skills development. While this is not purely infrastructure, it provides a whole of system approach to planning.

Most submissions commenting on this section identified the need for the Infrastructure Plan to be informed by good data analysis and be responsive to industry and the broader community. There was a repeated call for market research to identify areas of diversification, value-adding, scalable solutions, suitable sites and commercial partners. Concern was raised in some responses about the logistics of a statewide plan. There was a diversity of views expressed as to whether Tasmania should reconfigure existing infrastructure into centralised processing facilities (resulting in the closure of smaller/regional transfer stations and landfills) or to subsidise rural facilities (for broader community involvement and reducing transport costs).

A repeated concern in the submissions regarded economies of scale. It was suggested that Tasmania does not produce sufficient volumes of waste materials to warrant the types of investment evident interstate. Responses were divided on whether it is worthwhile investing in local processing facilities, with some submissions arguing that it would be more economical to use the Freight Equalisation Program to send materials such as scrap metal, e-waste, tyres, oil, cardboard and plastics to Victoria for processing.

Two areas of infrastructure development received unanimous support from the submissions that referred to them. Firstly, respondents indicated a need to invest in the weighbridges and data systems necessary for the administration of the waste levy as being critical to the success of the levy. Secondly, respondents expressed considerable support for FOGO processing infrastructure. Organics processing and composting was referred to in responses as a priority area that could be improved by expanding existing facilities and having statewide kerbside FOGO collection.

Some other infrastructure and investment areas suggested in the submissions included:

- Processing infrastructure for construction and demolition, and commercial and industrial waste to allow diversion of these materials directly to recovery centres;
- Plastic collection, with local sorting and processing facilities, including for soft/film plastics and rural silage wrap;
- Investing in existing resource recovery centres and expanding rural facilities, needed for the success of the Container Refund Scheme;
- Investment in markets to use the recycled materials recovered from local waste streams;

- End of life tyre recovery and processing facilities;
- Upgrading waste transfer stations. One respondent suggested these could be redesigned as materials recovery facilities;
- Standardise kerbside collection services, include FOGO bins statewide, but also separate glass and paper/cardboard bins to reduce contamination of recyclable materials;
- Invest in recycling plastics locally to produce food grade rPET and rHDPE to address the current lack of fit-for-purpose food grade recycled packaging, consistent with a Circular Economy;
- Address the gaps in waste management, treatment of controlled waste, medical and quarantine waste, site rehabilitation and management of PFAS/PFOS.

Specific investment measures were suggested in the responses to assist charity organisations in dealing with expected increases in dumping activity once a levy is introduced. Measures such as fencing, CCTV, signs and sensor lighting were suggested as deterrents to illegal activity. Balers and waste trucks to help process the waste materials received from dumping and unusable donations were also identified as worthy investments.

5. Support Resource Recovery across Industry

There was wide support in the responses for collaboration between industry and government to develop new and existing waste recovery enterprises, and to raise capital to realise projects and enable business creation. Some respondents suggested this could be achieved by resourcing an industry liaison officer role. Another suggestion was to draw on contributions from waste management and environmental service providers in either the planning stages or as part of an ongoing advisory group.

Responses identified the importance of developing the capacity to "close the loop" with support of the manufacturing industry. This was expressed in various ways, but the essential idea is that there needs to be both facilities to process recyclable material as well as markets for its use. To achieve this, respondents suggested two key mechanisms – disbursing waste levy funds to assist industry, and consideration of methods by which the government could support and create markets for recycled materials.

There was strong support for distribution of waste levy funds by way of a loan scheme for the resource recovery industry. Other suggestions included:

- Direct funding for meritorious projects;
- Support for avoidance, reduction and reuse projects rather than only focusing on recycling;
- A grants program which might include funding support for start-ups, pilot programs and testing of new ideas as well as funding for small-scale projects, not-for-profits and charitable organisations to expand their operations; and
- Incentives for businesses based on volume of secondary materials put back in circulation.

Most submissions referred to the need for all levels of government to have procurement policies that mandate the use of recycled products. One example of such a policy referred to in the responses was *Vic Roads* who have published their *Sustainable Procurement Guidelines* on their website to promote the uptake of recycled materials. Other suggested ways to support the marketing of recycled products included:

- Taxing imported materials where there is a local recycled alternative available e.g. glass
- Mandating the use of recycled material in construction works

- Collaborative procurement to assist economies of scale

One respondent cautioned that such changes could severely impact existing business models, highlighting the need for consultation with industry and allowing time for changes to be adopted.

Other suggestions to support the resource recovery industry included encouraging the re-use of products by expanding tip shops or the use of recycled materials in construction. Respondents also identified a need to phase out single use plastics and plastic packaging to facilitate efficient collection and sorting of recyclable waste and prevent contamination of recyclable waste streams.

6. Education and Community Engagement

There was widespread agreement in the responses that a major education campaign should be an important part of the final Waste Action Plan. Respondents identified the need for meaningful community engagement, targeting individuals, householders, as well as businesses and schools, to underpin adoption and ongoing commitment to good resource recovery practices.

Respondents also identified the need for a coordinated statewide awareness campaign to deliver consistent messaging. The work of regional waste management groups in this area was recognised in the submissions, with examples provided from the *Rethink Waste Tasmania* website, and the *Plastic Free Launceston* campaign to reduce single use plastics. Some councils have also developed education programs, such as the Glenorchy City Council's *Waste Starts with U* program. With funding from the waste levy, it was suggested, these programs could be expanded.

Key points recommended in the responses included:

- Use local media and marketing to deliver coordinated messaging;
- Be realistic and explain practical measures that people can take;
- Reinforce commitment to recycling by demonstrating the downstream destination for material that has been properly sorted, recycled or repurposed;
- Reinforce the Circular Economy message: i.e. you are not recycling unless you buy recycled products, "close the loop" and preference sustainable products;
- Tackle overconsumption by promoting minimisation and avoidance of waste (for example: the *Love Food Hate Waste* campaign targeting food waste from Sustainability Victoria);
- Promote projects/businesses that will help deliver on the Waste Action Plan target for reducing organic waste, such as YUME, an online marketplace for surplus food; and
- Using workshops and events, not just media, to engage with the community.

A repeated theme in the submissions was a need for education about minimising contamination of recyclable materials by educating the community on the materials that can be recycled. Standardisation of waste and recycling practices across the state (and indeed nationally if possible) and having consistent and informative labelling of packaging were recommended. Other suggestions to address contamination were to have council workshops and "bin audits" to provide households with one-on-one feedback on rubbish sorting.

Submissions from many stakeholders strongly advocated that waste reduction should be a key part of the WAP. It was suggested that an education campaign focussed on reducing food waste could address this, with respondents referring to data estimating that organic waste, including discarded food, makes up a

significant proportion of domestic waste and costs households is between $2,200 and $3,800 per year in wasted food.

Some examples of successful education programs in NSW and Victoria were referred to in submissions. These included NSW EPA's *Recyculator*, an online recycling calculator, the Clarence Valley Council's *Rubbish Handle with Care* campaign, which has increased recycling recovery rates from 41% to 85%, and the Glen Eira City Council organic waste program, which has been successful enough to prompt consideration of reducing general waste collections.

One respondent noted that charitable groups would benefit from a statewide education campaign that promotes responsible donating. It was suggested that a campaign such as that run by the EPA in NSW could be used to increase the quality of donations thereby reducing waste from unusable donations to charity premises, many of which have become hot spots for dumping this kind of waste.

7. State and National Policy and Regulatory settings

Although broadly supportive of all the key planks of the Draft Waste Action Plan, some respondents cautioned that interstate and overseas examples demonstrate that a waste levy, of itself, will not drive a Circular Economy. They advocate that there needs to be reinvestment of the levy funds into industry and incentives for individuals to change behaviour.

Some responses indicated that they were very keen to see the measures in the WAP adopted as swiftly as possible. On the other hand, some businesses and associations were concerned about the potential speed of the changes, suggesting prioritising the development of infrastructure before imposing requirements that could affect their business.

It was strongly recommended in the submissions that the state government work with the Australian Government, states and territories, and local government to develop harmonised guidelines and regulations that will promote resource recovery. Some suggested areas for a national strategy include:

- Recycling guidelines - such as minimum sorting standards so as to produce consistent high quality material;
- Landfill bans;
- making recycling of some materials mandatory;
- Certainty of downstream destinations, avoiding "green washing" marketing and having compliance measures to ensure consumers are getting genuine recycled products;
- Packaging regulation;
- Harmonisation of waste levies and consistent Container Deposit/Refund Schemes;
- Government procurement policies;
- Encouraging manufacturers to commit to a percentage of recycled material in their products;
- Product stewardship and producer responsibility schemes;
- Phasing out problematic and unnecessary plastics;
- A national acceptable product list, as an easy reference for business and consumers to source sustainable goods; and
- A national education program; similar to the *Slip, Slop, Slap* or *Life Be In It* campaigns.

Many respondents were concerned about hazardous waste management, with calls for an electronic waste tracking system. Some submissions suggested that the finalised Waste Action Plan should be broader in scope, perhaps also tackling issues like household hazardous waste and liquid wastes. Some responses suggested incorporating contingency planning into waste policy – i.e. planning for emergency situations, loss of infrastructure and markets, natural disaster clean-up and climate change.

Appendix 1

List of public Submissions to the Draft Waste Action Plan – Consultation Draft June 2019

Submission Number	Organisation	
1	Island Block	Tasmanian Business
2	Robert Cassidy	Individual
3	Gianfranco Biseti	Individual
4	Ian Cargill	Individual
5	Bootstrap Enterprises	Tasmanian Business
6	Simone Taylor	Individual
7	Pam Allan	Individual
8	Ann McGinniss	Individual
9	Meander Valley Council	Local Council
10	Burnie City Council	Local Council
11	Dulverton Waste Management and Cradle Coast Waste Management Group	Local Govt. Collaboration
12	South Hobart Sustainable Community Inc.	Community Group/Not for Profit
13	Confidential	Local Govt. Collaboration
14	Southern Waste Solutions Copping Refuse Disposal Site Joint Authority	Local Govt. Collaboration
15	Tasmanian Food Cluster	Community Group/Not for Profit
16	George Town Council	Local Council
17	Australian Tyre Recyclers Assoc.	National Business Assoc.
18	Tasmanian Minerals, Manufacturing & Energy Council	Tasmanian Business Assoc.
19	NACRO	Charity Assoc.
20	West Tamar Council	Local Council
21	Glenorchy City Council	Local Council
22	Devonport City Council	Local Council

23	TasWater	Tasmanian Business
24	Kingborough Council	Local Council
25	Sorell Council	Local Council
26	Mornington Park Waste Transfer Station	Tasmanian Business
27	Australian Beverages Council	National Business Assoc.
28	Waste Management & Resource Recovery Association of Australia	National Business Assoc.
29	Local Government Association of Tasmania	Local Govt. Collaboration
30	Northern Tasmanian Waste Management Group	Local Govt. Collaboration
31	Launceston City Council	Local Council
32	Clarence City Council	Local Council
33	Mememe Productions Pty Ltd	Interstate Business
34	A Walker	Individual
35	Break O'Day Council	Local Council
36	Don Thwaites	Individual
37	Eat Well Tasmania	Community Group/Not for Profit
38	Huon Valley Council	Local Council
39	King Island Council	Local Council
40	Public Health Service, Dept. of Health	Tasmanian Govt. Dept.
41	Australian Institute of Architects	National Business Assoc.
42	Australian Packaging Covenant Organisation Ltd	National Business Assoc.
43	Plastic Free Launceston	Community Group/Not for Profit
44	Australian Food and Grocery Council	National Business Assoc.
45	Regional Development Australia	National Business Assoc.
46	Recovery (Tas) Pty Ltd	Tasmanian Business
47	Resource DC	Tasmanian Business
48	Business Action Learning Tasmania	Tasmanian Business Assoc.
49	Circular Economy Huon	Community Group/Not for Profit

50	Central Coast Council	Local Council
51	Latrobe and Kentish Councils	Local Council
52	Veolia Australia and New Zealand	National Business
53	Southern Midlands Council	Local Council
54	Startup Tasmania	Community Group/Not for Profit
55	Tas Gas	Tasmanian Business
56	J Foley	Individual
57	Tanya Hussey	Individual
58	Thomas Crawford	Individual
59	Tasmanian Conservation Trust Inc.	Community Group/Not for Profit
60	Peloton Corporate	Interstate Business
61	Tasmanian Farmers and Graziers Assoc.	Tasmanian Business Assoc.
62	National Waste Recycling Industry Council	National Business Assoc.
63	Eat Well Tasmania (second submission)	Community Group/Not for Profit
64	Andy Low	Individual
65	Confidential	National Business
66	West Coast Council	Local Council

Department of Primary Industries, Parks, Water and Environment

Phone: (03) 6165 4599

Email: WAP.Enquiries@dpipwe.tas.gov.au

www.dpipwe.tas.gov.au