



Ms Pam Allan
Chair
Waste and Resource Recovery Board
GPO Box 44
HOBART TAS 7001

Email: enquiries@wrr.tas.gov.au

24 February 2023

Dear Ms Allan

Re: *Draft Waste and Resource Recovery Strategy 2022-2025*

The Waste Management and Resource Recovery Association of Australia welcomes the opportunity to provide feedback on the Tasmanian Waste and Resource Recovery Board's *Draft Waste and Resource Recovery Strategy 2022-2025*.

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body for all stakeholders in the \$15.8 billion 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 waste.

WMRR commends the focus on circular economy in the Strategy and urges the Board to continue to place emphasis on the higher order circular economy principles in the targets and actions. To move towards a true circular economy, there must be real shift in focus from the end-of-pipe (i.e., what can we "make" from this "waste", what bin does it go in?) to the importance of material selection and design, generator accountability and responsibility as well as systems that support re-use, repair and share. In order to achieve this important paradigm shift for Tasmania there must be an understanding and an acknowledgement that essential WARR facilities are recipients of materials, not generators and the Strategy must focus on the role that the entire supply chain plays.

WMRR acknowledges the ambition of a zero-waste goal, however unless there is emphasis and regulation on design, material selection and producer responsibility there will likely always be residual waste either through contamination or hazardous or controlled waste. As such it is vital to recognise and support facility development across the entire waste management hierarchy to enable integrated and sustainable material management.

Government can and must play a key role in both leadership and behavioural change, particularly educating and empowering the community and businesses to act in accord with the waste management hierarchy and to adopt circular economy principles. By pursuing low waste outcomes

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037

(02) 8746 5000
INFO@WMRR.ASN.AU

WMRR.ASN.AU



and adopting sustainable procurement practices, government through the Strategy could also achieve a reduction in carbon emissions, as well as energy consumption, an increase in local jobs and a reduction in the reliance on virgin material.

WMRR's full submission, which includes several recommendations, can be found at **Annexure A**. Please do not hesitate to get in touch with the undersigned if you would like to further discuss WMRR's submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'G Sloan', positioned below the 'Yours sincerely' text.

Gayle Sloan
Chief Executive Officer
Waste Management and Resource Recovery Association of Australia

SUBMISSION

Section	WMRR's feedback
General	<p>WMRR commends that the Board has a 'bold vision to guide waste management [and resource recovery] in Tasmania'. However, WMRR considers at this time, the targets, objectives and actions do not appear to have been articulated as clearly as could be in the Strategy. WMRR would suggest a stronger and more certain link between actions proposed for delivering objectives and objectives meeting the targets. this also applies to the Appendix Actions.</p> <p>WMRR suggests that without assigned roles and responsibilities/accountabilities, details for delivery and measurable indicators, it is difficult to both understand and enforce the proposed actions, to deliver on the objectives and targets over the 12-month timeframe. WMRR is hopeful that these details will be provided in the follow-up action plan which will then be able to provide practical pathways in which these actions can and will be implemented, funded, tracked and/or delivered. WMRR would also greatly appreciate the ability to be involved in the development of these.</p> <p>WMRR supports industry developed targets being added to the Tasmanian Strategy, as the current ones are based off the National Waste Action Plan 2018. WMRR encourages a metric for measuring circular economy to be added, a baseline referenced and clearly outlining how the targets interact. For example, will the 'reduction of organic waste to landfill' be counted towards 'achieving 40% on average recovery rate', and will 'reduction of food waste' be in addition to 'reduction of waste generated'?</p> <p>Issues surrounding the lack of information in Tasmania are noted in the Strategy without being addressed. WMRR encourages the Board to consider finalising the infrastructure audit and to review the data collected for the National Waste Reports, to assist in creating evidence-based actions and provide information to not only guide investment priorities but support awareness and behavioural change activities.</p>
Priority Investment Areas	<p>WMRR support the focus on waste and resource recovery infrastructure for priority streams and new information systems (education and behaviour change) to facilitate the uptake and accurate recovery. Further, WMRR supports the increase of resource recovery and reuse program across Tasmania. WMRR suggests a few clear investment areas to compliment the above, including:</p> <ul style="list-style-type: none"> • A state-wide education and behaviour change platform and incentives. • Organic recovery from municipal solid waste and commercial and industrial waste. • Tasmanian re-manufacturing using recycled/recovered material.

	<ul style="list-style-type: none"> • Market development of recycled organics use in agriculture to regenerate soils and nature. • Sharing economy business models that reduce waste (product libraries, repairs cafes, sharing platforms). • Precinct areas. <p>WMRR also suggests outlining 'Priority Material Streams' in the Strategy, which could include:</p> <ul style="list-style-type: none"> • Plastics • Organics • Construction • Transportation • Textiles <p>As well as a clear focus on hazardous and problematic materials such as batteries and POPs like PFAS.</p>
Pillars /Focus areas	<p>WMRR would recommend that the Board look to the EU's whole-of-government approach as a best practice collaborative model and consider how it can adopt, into the Strategy and Action Plan, appropriate elements of the proven EU's 2015 circular economy plan, which comprises:</p> <p>Four (4) key areas: production, consumption, waste management, and secondary raw materials; and five (5) priority sector areas mentioned above.</p>
Pillar 1: Integrated Planning and Action	<p>The Strategy in its current form will not enable a structural shift in the way we produce, consume, and manage materials across the entire supply chain. By adopting the above EU approach, the plan will also be more user-friendly and readable and significantly reduce repetition, as well as be contemporary and leading the nation.</p> <p>As an interim the Board may elect to view this document as stage one (1) of a two (2) staged approach of setting the foundations, increasing demand for recycled material, and driving behavioural change, while developing further strategies for a circular economy.</p> <p>WMRR supports the desire to align state, regional and local strategic planning. If the above-mentioned edits are adopted WMRR believes that the Strategy can become a guiding document for regional and local plans.</p> <p>In 'moving towards a circular economy' it is important that the Board consider the entire supply chain and higher-level principles in the waste management hierarchy.</p> <p>For example, to encourage avoidance and to reduce the production of single use items, education and behavioural change campaigns are needed throughout the supply chain, not only for the end consumer.</p>

<p>Pillar 2: Strategic Investment</p>	<p>WMRR encourages the Board to follow the example set by Sustainability Victoria and Green Industries SA and continue to emulate the work these organisations have done in developing industry policies that focus on material design, sustainable procurement and market demand, which is then supported with comprehensive infrastructure plans and targeted funding arrangements to meet State targets.</p> <p>When considering strategic investment WMRR encourages the Board to consider a systems-based approach which is underpinned by the circular economy principles and the waste management hierarchy. A genuine circular economy in Tasmania considers carbon mitigation, emphasises product design (to design out waste), extended producer responsibility, development of a sharing and repairing economy and sustainable natural material management, as well as having clear pathways for the use of secondary raw materials in order to keep these in circulation.</p> <p>WMRR supports funding to be prioritised to include organic diversion and processing infrastructure however encourages the Board to also consider developing a strong avoidance strategy such as Love Food Hate Waste, systematic production changes (alternative market development, crop diversification, harvesting efficiencies) as well as value-adding business ideas (preserve, distil, ferment, dehydrate) to enable the waste not being created in the first instance and has the added benefit of reducing expenses. An avoidance campaign should be at the forefront so that infrastructure investment is future fit, leaves money in householder’s pockets, and does not result in stranded organics assets.</p> <p>WMRR also supports a focus on local circular manufacturing, recycling and redesign. However, reiterates that securing demand for secondary raw materials requires strong attention and as mentioned below needs government initiatives to support growth in demand.</p> <p>WMRR supports the inclusion of soft infrastructure investment to ensure this essential workforce has the necessary skills to continue to grow and innovate.</p>
<p>Pillar 3: Prioritise circularity</p>	<p>WMRR would suggest an explicit focus on market development for the use of recycled products focusing on the five (5) priority materials above and encourages the Board to develop green procurement targets for all levels of government which would include clear targets for dollars and tonnes of recycled materials. Best practise without targets removes an element of accountability that is crucial in changing behaviours to align with the higher order circular economy principles and creating demand for recycled material that replaces virgin as a feed stock for new products. The Strategy must assist in developing the requisite market demand and therefore infrastructure investment and employment in Tasmania.</p>

	<p>Sustainable design requirements should also be pursued in government procurement, including for example requirements for post life recyclability, support for reuse by for example, being modular etc.</p> <p>The Tasmanian government must continue to participate nationally in the development of consistent specifications and standards to allow for the use of recycled and/or remanufactured goods. WMRR encourages Tasmania to investigate how it could learn from and adapt the work that departments such as Transport for NSW and Ecologiq in Victoria are doing in prioritising and using recycled material in infrastructure development as part of government procurement.</p> <p>WMRR supports the Board investigating EPR options for materials that do not have clear end of life pathways. Whilst nationally there are discussions about solar panels and batteries there are a number of other significant waste streams that could be prioritised in Tasmania such as agricultural plastics, C&D materials, textiles, single use plastics and compostable alternatives.</p> <p>WMRR would also like to draw attention to the role of behaviour change, design, sharing, repair and reuse for avoiding waste production and suggest that the objectives and action explicitly capture these.</p>
<p>Pillar 4: Engagement and Partnerships</p>	<p>WMRR supports the recognition of emissions as part of the Strategy given the clear link between material management and carbon.</p> <p>WMRR stresses that behavioural change and education programs need to be incorporated into Pillar 1 to ensure an aligned approach across the levels of government in Australia and Tasmania.</p> <p>WMRR supports stronger engagement with the Aboriginal community and encourages the Board to consider how caring for Country can be further incorporated in programs, policy and regulation.</p> <p>WMRR encourages the Board to consider the entire waste management hierarchy and ensure that we are considering material management as a resource management system, going beyond municipal materials, to include working with industry on construction and demolition and commercial and industrial products, the agriculture and food retail sectors and charitable recyclers. The Strategy needs to consider barriers to encouraging the higher-level waste management hierarchy action (eg avoidance and reduction not just recycling) for all above mentioned sectors and industries.</p>