



Mr Craig Limkin
Associate Secretary
Department of Premier and Cabinet
GPO Box 123
Hobart, 7001

Email: policy@dpac.tas.gov.au

6 October 2023

Dear Mr Limkin

Re: Tasmanian Positive: Our state's sustainability strategy Discussion Paper

Thank you for the opportunity to provide feedback on the *Tasmanian Positive: Our state's sustainability strategy Discussion Paper*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 500 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and NGOs.

WMRR continues to strongly advocate that Australia requires a national systems-based approach to managing materials. This must be underpinned by the adopted waste management hierarchy, as we move towards a genuine circular economy that considers carbon mitigation, emphasises product design, extended producer responsibility, and sustainable natural material management, ensuring that there is a clear pathway for the use of secondary raw materials in order to keep these circulating. WMRR commends Tasmania's intent here and encourages Tasmania to make the most of this opportunity and lead the national dialogue on the importance of sustainability.

WMRR encourages Tasmania to build circular economy principles and the waste management hierarchy themes into the strategy, to ensure that a connected system is considered in the goals and actions, to determine the real root cause of problems without proposing solutions that lead to further issues down the line. Sustainability needs to be embedded in every policy and action of local and state government to shift the paradigm.

WMRR supports the focus in the strategy on development, as Australia needs to break free from over consumption, and a 'take, make, discard' lens of consumption. By recognising the true value of resources, the importance of behavioural change is apparent. For example, transitioning to renewable energy and more energy efficient products may not reduce carbon emissions if consumption patterns remain the same. The circular economy cannot be a stand-alone goal but rather the economic model that underpins the strategy and is reflected in all goals and actions.

WMRR believes that there is a real opportunity to develop a consistent state-wide campaign that influences sustainable and circular behaviour, however we also recognise and support local campaigns that have grown and developed in the absence of a coordinated campaign. Messaging to-date

WMRR NATIONAL OFFICE
57 ST JOHNS ROAD
GLEBE NSW 2037

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

WMRR.ASN.AU



struggles to raise the need to consider our consumption habits and take responsibility for the waste we create (whether as an individual, company or facility). It's time to turn the conversation with the broader community towards consumption and avoidance, as well as promoting recycling, remanufacturing and take-up of recycled products, in accord with the waste management hierarchy.

WMRR's responses to the consultation questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

Submission:

<p>Vision</p> <p>1. What do you hope Tasmania looks like in 2050 – our society, economy, and natural environment?</p> <p>2. What are the most important challenges we need to overcome to achieve your vision for Tasmania in 2050?</p>	<p>WMRR strongly supports the ‘holistic and coordinated approach to sustainability targets and actions’ the strategy envisions and believes that guarding against siloed policy and ensuring the embodiment of the strategy is the pillar for decision making across government will go some way to achieving this.</p> <p>In 2050 WMRR hopes to see the circular economy as the dominant economic model in Tasmania with sustainable design, circular procurement and strong extended producer responsibility scheme policies. The community, industry and government will recognise the true value of resources and consumption will be in line with the needs of Tasmanians.</p> <p>Messaging to-date has struggled to raise the urgent need to consider our consumption habits and take responsibility for the resources we use and the waste we create. Resource management is vitally important and we need policy to recognise that 80% of a product’s environmental impacts are locked in at the design phase - well before a consumer is faced with the consumption or avoidance question.</p> <p>The transition to a circular economy will involve market intervention by government to address externalities. Addressing the price disparity between virgin and recovered materials, barriers to repair or local design requirements are just a few that come to mind. Some interventions will involve regulation while others may involve the government supporting new circular models by bearing the upfront costs and associated risk. For example, to support a circular infrastructure model where modular assets retains their value at higher order use in a different setting (instead of relying on down cycling of material when an asset is decommissioned the recycling, not economy in action). This focus on design relates to projects and processes as much as it does to products and needs to become part of Tasmania’s culture.</p> <p>As stated above by taking a systems-based approach the government can evaluate WARR issues when making initial project decisions and avoid a repeat of the looming solar panel end-of-life problem. These considerations and the first tenement of the waste hierarchy (avoidance) will be key to achieving the 2050 goal.</p>
<p>Goals</p> <p>3.</p>	<p>WMRR supports streamlining the SDGs and encourages the department’s efforts to put a Tasmanian stamp on these generalised goals.</p>

<p>If we streamline the United Nations 17 Sustainable Development Goals to around six sustainability topics or focus areas for Tasmania's sustainability goals, what would they be, or do you think we should simply align with the SDGs?</p> <p>4. In what areas of sustainability do you think Tasmania is doing well, and are there other priorities where we could do better?</p>	<p>WMRR suggests combining elements from Goal 1, 4 and 5 into a built environment goal which recognises infrastructure planning, construction design and demolition and energy (production and consumption) in materials and running. The transition to renewable energy is part of the process in reducing emissions but should not only include promoting energy efficient products but efficient processes such as repair and reuse and recognise the carbon cost of virgin material.</p> <p>If Goal 4 remains and the circular economy aspect is not pulled out and applied to all of the goals, it should be Circular Economy and Valued Resources. Instead of focusing on end-of-life and 'waste' the emphasis should be on a society that understands the true value of resources and behaves accordingly. 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 material design and generator accountability. For example, as solar panels have demonstrated intervention is required 30 plus years in advance or the WARR sector is required to solve a problem not of their own making, that should have been identified and mitigated at the design stage.</p> <p>WMRR encourages education and behavioural change programs highlighting the most important aspect of sustainability (sustainable consumption and resource efficiency) as well as the benefits (local jobs as well as environmental) of preferencing and purchasing products that are made to last, repairable, made from Australian secondary raw materials, and if buying new, the need to focus on purchasing materials that can be genuinely recycled.</p> <p>WMRR commends Tasmania for preparing to join the rest of Australia in the container deposit scheme and encourages more mandatory extended producer responsibility schemes. While the government develops a sustainable procurement framework that includes enforceable green (local and state) government targets, incentives to encourage a similar framework for the private sector are encouraged.</p>
---	--