NWRIC

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NATIONAL WASTE AND
RECYCLING INDUSTRY COUNCIL
ABN 22 617 891 899

Committee Secretary
Standing Committee on Industry, Innovation, Science and Resources
PO Box 6021
Parliament House
Canberra ACT 2600

Dear Mr Joyce,

The National Waste Recycling Industry Council's (NWRIC) is the national industry body for commercial waste and recycling operators Australia wide. Its vision is for a fair, safe, transparent, sustainable and innovative national waste and recycling industry that services all Australians.

The NWRIC brings together national and state businesses to develop and promote policies and actions that will advance the waste and recycling sector in Australia. Its mission is to represent its members priorities to the government and to promote its members' contribution to the community, environment and the economy.

National members and state affiliates of the NWRIC are committed to moving materials up the waste hierarchy, helping to create a circular economy by turning waste into resources and ensuring the safe treatment and disposal of materials that cannot be recovered.

With an estimated turnover of more than $10 billion per annum, over 16,500 employees and more than 10,000 trucks our members collect, sort, process and treat more than 10 million tonnes of waste from households and businesses per year.

Founding members of the Council, Cleanaway, J. J. Richards and Sons, Solo Resource Recovery, Sims Metal Management, Remondis, ResourceCo and Veolia own and operate many of the waste collection, transport, processing, recycling, treatment and disposal services and facilities nationally.

This includes landfills for hazardous, inert and putrescible wastes; soil recovery; medical, liquid and hazardous waste treatment; thermal destruction; fuel manufacture; energy recovery; anaerobic digestion; composting; material recycling facilities; aggregate recycling plants and oil recovery plants.

The NWRIC welcomes the opportunity to provide feedback to the *H*ouse Standing Committee on Industry, Innovation, Science and Resources and extends an open invitation committee members to visit member sites.

Importantly, the NWRIC would like to draw the committee's attention to the 18 recommendations from the Senate Environment and Communication Reference Committee Inquiry "*Never waste a crisis: the waste and recycling industry"* published in June 2018. Sadly progress on many of these recommendations has been slow. The NWRIC supports the majority of these, and we strongly recommend consideration of these as part of your inquiry.

COUNCIL MEMBERSHIP INCLUDES NINE FOUNDING MEMBERS
Cleanaway | JJ Richards and Sons | Remondis
Veolia | Solo Resource Recovery | Sims Metals
and ResourceCo.

IT ALSO COMPRISES STATE AND TERRITORY AFFILIATES
Waste Recycling Industry Queensland (WRIQ)
Waste Contractors and Recyclers Association of NSW & ACT (WCRA) | Victorian Waste Management Association (VWMA) | Waste Recycling Industry of South Australia (WRISA)
Waste Recycling Industry of Western Australia (WRIWA) and the Waste Recycling Industry Northern Territory (WRINT)

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RESPONSE TO TERMS OF REFERENCE

As per the terms of reference, the NWRIC consider the following innovative solutions and opportunities to develop Australia's circular economy.

Industrial, commercial and domestic waste;

The key challenges facing the waste and recycling industry is not so much the lack of technological innovation, but instead the need for systemic innovation that will create confidence and certainty across the sector to invest in advance solutions.

Where commodity prices are strong for recovered materials resource recovery is high. This is best illustrated by the recovery of metals, paper, construction and demolition materials in particular. Where commodity prices are weak such as in plastics, glass and organics recovery rates are less. Where separation at source of material types is poor, recovery rates are even lower.

Where federal, state and local regulations are clear, consistent and enforced, waste is better managed, quality resources are recovered and reused, and industry is more confident to invest in advance solutions. One example is oil recovery under the *Product Stewardship (Oil) Act 2000*. Where regulations are inconsistent, continually changing, poorly enforced e.g. National Environment Protection Measure (Used Packaging), Resource Recovery / End of Waste specifications, e-waste to landfill bans; waste is not always managed properly, hazardous materials are dumped, recycling streams are contaminated, and there is a greater occurrence of substandard and unlicensed operators.

This, on top of lengthy planning approval timeframes, lack of designated waste and recycling precincts, with appropriate buffer zones protected from residential encroachment, substantially increase the cost to aggregate, sort and recover resources and treat waste from all collection streams. As well as significantly reducing industry confidence in investing in new technologies and assets due to the lack of uncertainty in site tenure and ever changing environmental and planning regulations.

Government's need to focus their attention on addressing these system failures, through innovative regulatory and procurement approaches with appropriate financial support, rather than short term technical fixes.

To reduce waste and pollution and make better use of our resources, innovation is required across the whole system. From what materials and resources we are using to produce goods and materials to how they are collected, reused and recirculated through the economy, or finally disposed of if a recovery solution is unavailable.

Specifically, the NWRIC is advocating for;

- Greater development of markets for recovered materials locally and overseas including reuse in products, packaging and construction materials.
- Better planning regulations and instruments that provide for waste and recovery facilities at local, state and national level.
- Stronger federal, state and local, government enforcement of regulations and standards to ensure best practice across the sector.
- Greater separation of wastes at source to reduce contamination and pollution and to increase resource recovery.
- Designing out hazardous, non-recyclable and non-compostable materials and substances from products, packaging and construction materials.

The federal government can help deliver these changes by;

- Implementing the national waste policy action plan and national food waste strategy.
- Proper enforcement of the Commonwealth *Hazardous Waste (Regulation of Exports and Imports) Act 1989*.
- Implementing the Product Stewardship Act, specifically product stewardship regulations for batteries, packaging, all electronics, photovoltaics and tyres. To address system failures, this would include;
    - mandating minimum recycled content in plastic packaging and electronic products,
    - banning single use plastics,
    - Establishing producer /manufacturer funded collection and recycling services for batteries, photovoltaics, all electrical and electronic equipment and tyres,
    - designing out use of PFAS and other hazardous substances from all products, and
    - harmonising community access, collection targets, material recovery rates across state and territory based container deposit/return schemes.
- Procuring recovered materials especially aggregates, glass, tyres, plastics and paper in construction of infra-

structure, products and packaging.
- Working with the NWRIC to develop national resource recovery specifications for all material types to ensure quality outputs that meet manufacturer, construction industry and farmer requirements.
- Replacing the NEPM for Used Packaging with a Product Stewardship (Packaging) Regulation, to ensure packaging targets are met and responsibility for enforcement rests with the federal government, rather than with States and Territories, a key weakness in the measure.
- Working with the NWRIC to develop; 1) national resource recovery specifications to ensure quality quality outputs that meet manufacturer, construction industry and farmer requirements. 2) National collection specifications to ensure quality inputs for processing, the output would be a national standard for domestic, commercial and industrial collection bins and their contents adopted by all states, territories and local governments. This could easily be done for domestic collections and a standard is already in place for commercial collections (Western Australia, SA and NSW have very good models to draw on).
- Educating the community on buying recycled and implementing a nationally agreed "Recycle Right" campaign similar to the "Love Food, Hate Waste" campaign developed by NSW and being rolled out by other States.
- Formulating with the states and territories a National Energy Recovery from Waste Strategy to reduce greenhouse gas emissions, prevent illegal dumping and extend the life of existing landfills.
- Banning the export of whole baled cars, whole whitegoods, unprocessed mechanical lubricating oils, and whole electronics and electrical equipment.

State, territory and local governments can also assist by;

- Investing more resources (preferably funded by the waste and landfill levies) to enforce existing regulations to prevent illegal operations, substandard waste and recycling facilities and illegal dumping particularly in the areas of car wrecking, scrap metal, whitegoods, e-waste, tyre collection and recycling, chemicals.
- Reforming local and state planning regulations and plans so they encourage development of recycling and waste facilities in strategically located areas that have a long tenure, are acceptable to the community and economically viable for waste and recycling businesses.

Landfill reduction/rationalisation
There are two key action plans that should be addressed here.

Reducing materials to landfill and greenhouse gas emissions

This can be achieved by;
- diverting organic and food wastes from domestic and commercial rubbish bins,
- establishing refuse derived fuels and energy recovery facilities for non recyclable materials,
- diverting construction and demolition waste by establishing recycling hubs for construction and demolition waste that enables greater recovery, processing and supply of recovered materials back into the infrastructure construction sector, and
- reducing the amount of waste created in the first place by designing out waste in products, increasing the durability, repairability and lifespan of products.

Presently food and organics make up 50% of the volume of material going to landfill. Initiating organic and food waste collections for households and businesses is very important. As is minimizing contamination of these streams from household goods, batteries, nappies, cutlery, plastics, glass, metals. Therefore, separation at source is key to optimise the recovery rate, quality and value of this material as a compost and soil fertilizer.

Key to this will be establishing nationally agreed and scientifically based organic and food resource recovery specifications so the output can be certified for application to land and other uses.

Collaboration with the agriculture sector will be key to demonstrate the value and increase uptake of certified compost and fertilizers by farmers.

Recovering gas to produce energy from food and organic wastes is also a way to produce renewable energy and divert materials from landfill. Once again managing the input of this material into a biodigester for processing is vital to prevent contamination of the sludge outputs which can be used as soil conditioners and fertilizers. A lot of work has been done on specifications and land application of biosolids from wastewater treatment plants which could be used here.

Establishing energy recovery from non-recyclable materials is also an effective way to reduce materials going to landfills. Materials suitable for energy recovery include non recyclable residuals from scrap cars (e.g. fabrics, plastics), buildings and infrastructure (plastics, contaminated timber, paints) and contaminated biosolids.

Establishing recycling hubs for construction and demolition waste will enable greater recovery, processing and recirculate these materials along with crushed glass and plastics into the construction and building sector. Siting these facilities is key to ensure the recovered materials can compete with virgin materials. Therefore, local and state governments need to factor these precincts into their urban and regional plans. Without adequate space these sites will not be able to process and supply volumes required for future construction activity.

Key to reducing the amount of waste produced in the first place is application of extended producer responsibility principles through the *Product Stewardship Act 2011*. Especially in the design phase of products where producers, manufacturers should be required to design out waste throughout the lifecycle of their product. This would include making products more durable and suitable for reuse, substituting virgin materials with recovered materials in its manufacture, ensuring products can be easily and cheaply repaired, and at the end of their life ensuring the products can be easily disassembled for parts harvesting, recycling and/or composting.

Reducing the impacts of landfills on the environment
There are currently more than 600 landfills across Australia. Many of these are located in regional and remote Australia. Many of Australia's smaller landfills lack environmental controls such as landfill cell liners, appropriate leachate treatment, weighbridges and gas capture. The NWRIC is advocating for the number of landfills to be rationalized, and all landfill to be managed to a minimum standard.

Specifically, the NWRIC is calling on the federal, state and territory governments to;

- Agree and legislate a National Landfill Operating Standard.
- Agree to a national plan to close and consolidate landfills that do not meet this standard.

This work should be funded by each State's and Territories waste and landfill levies.

Other related matters.
To optimise resource use and to prevent pollution, best practice waste and recycling is essential. Nationally harmonising state and territory laws and regulations governing the waste and recycling industry would greatly assist in raising the standard of waste and recycling services across Australia.

It would increase industry confidence in investing in advanced solutions that would deliver higher resource recovery and more cost efficient and environmentally responsible waste management.

The approach taken could be similar to that applied nationally to manage work, health and safety regulations using model laws, or the National Heavy Vehicle Regulator. Approaches to managing energy nationally would also be a useful guide.

We would welcome the opportunity to meet with the Committee and provide more details or answer questions.

For further information please contact NWRIC Secretary Alex Serpo (secretariat@nwric.com.au or 0417 932 303) in the first instance.

Sincerely,

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