Essential for community Essential for environment
National Waste & Recycling Industry Council

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Response by the National Waste & Recycling Industry Council (NWRIC) to the Draft NSW Circular Economy Policy & Discussion Paper

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The National Waste and Recycling Industry Council (NWRIC) is the representative body for national waste and recycling service providers. Its core activity is to proactively engage our key stakeholders to promote solutions to the challenges facing the sector.

The current members of the Council are Alex Fraser, Cleanaway, J. J. Richards and Sons, Solo Resource Recovery, Sims Metal Management, Suez, Remondis, ResourceCo and Veolia and State and Territory affiliates - WRIQ, WRCA, VWMA, WRISA, WRIWA and WRINT. Together they represent the majority of the privately owned waste management and recycling assets Australia wide.

Our members collect and process unwanted materials from nearly every household and business across Australia, enabling councils to provide essential services to their communities and helping businesses manage and reduce their waste costs.

Our vision is for a fair, safe and sustainable waste and recycling industry. We work to achieve this by transforming waste into resources for reuse or energy; ensuring the safe handling and disposal and treatment of non-recyclable and hazardous waste, and by providing a safe and clean environment for the community.

The NWRIC welcomes the opportunity to comment on the Draft NSW Circular Economy Policy & Discussion Paper.

GENERAL QUESTIONS

Do you support NSW having a circular economy policy? Why or why not?

- Yes. The National Waste and Recycling Industry (NWRIC) supports NSW having a circular economy.

- In the context of the waste and recycling industry the NWRIC, sees the 'circular economy' as the progressive application of the waste hierarchy. From preventing waste generation as the most favoured to disposal to landfill as the least favourable.

- Council members and affiliates play a major role in facilitating elements of the circular economy. From collecting, reusing, recycling, recovering and treating unwanted materials and resources to providing innovative solutions to the commercial, construction and government sectors on how to better manage

their resources and materials.

What would you like to see in a Circular Economy Policy?

- The policy needs to reset how people, business and government in NSW understand how to better use materials and resources.

- This means using our materials and resources more wisely by changing the way we produce and consume goods and services. By not using hazardous and dangerous materials. By creating new and preferred pathways for material types, products and services.

- The transition to a circular economy will also require innovation along with investment and development of new infrastructure and technology to enhance resource productivity and create business opportunities both locally and overseas.

- The focus must be on maximising the life and value materials and realising their highest value. Moving towards zero waste, slowing the flow of materials and resources through their lifecycle and finding shorter pathways to keep products, materials and nutrients from organics in use for longer.

- The policy should be underpinned by core principles framed in the context of material types, product types, nutrients and services. This can be achieved through:

  Regulatory Reform
  - Ensuring waste regulations align with other States and the Federal Government waste regulations to encourage the movement of resources up the waste hierarchy

  - Shifting the current waste and recycling policies, strategies and regulations away from a "waste generation and collection channel" focus (i.e. Municipal, Commercial and Industrial, Construction and Demolition) to a "resource / material / nutrient pathways" focus (i.e. plastics, metals, paper, glass, hazardous substances, organics, aggregates etc.)

  - A stronger emphasis on product stewardship related regulatory instruments that seek to maximise the life and value of products and materials eg. codes, regulations and standards that support and encourage product reuse and repair.

  Infrastructure Planning
  - New infrastructure will be required to transport and processing materials including new equipment, bins, composting and waste to energy facilities, new monitoring technologies, and training, market development, and integrated waste/resource/material data systems.

  - Over the next 30 years a greater variety of sophisticated technologies will be needed to sort, recycle and process the increasingly complex materials which may include rare earth metals, mixed polymers and potentially hazardous substances if not processed correctly.

- The role of technology and digitisation should be considered including how the Internet of Things and Blockchain can be used to better manage, track and report on materials production and consumption.

Education

- Educate all parts of society (business, government and community) to raise awareness about the finite nature of our resources, the importance of renewable resources, sustainable procurement and the importance of shifting production and consumption patterns to a more sustainable level.

How could the Government support a transition towards a circular economy?

Reforming waste and recycling regulations including;

- Harmonising licensing, waste/landfill levies, transport and processing of materials with other states to encourage the movement of resources up the waste hierarchy,

- Introducing regulated extended producer responsibility schemes with a focus on removing hazardous (e.g. asbestos), non-recyclable, non-compositable materials from products and establishing alternate collection systems. Priorities would be for glass, batteries, all electronic and electrical waste, mercury containing products, aerosol cans and nappies.

- Banning single use problematic plastics.

- Incentivising or mandating recycle content in products.

- Reviewing the National Environment Protection Measure to hold packaging companies accountable for not achieving agreed targets under the Covenant.

- A stronger emphasis on product stewardship related regulatory instruments that seek to maximise the life and value of products and materials e.g. codes, regulations and standards that support and encourage product reuse and repair.

Long term Infrastructure planning (i.e. up to 30 years)

- There is an urgent need for a 30-year infrastructure plan for NSW. This plan needs to forecast NSW's resource / material /waste flows over the next 10 and 30 years in the context of changing state demographics, lifestyles, ever changing materials including rare earth metals, mixed polymers and evolving technologies to determine the collection, transport and processing infrastructure requirements and supporting training, market development, business models and education to transition to a circular economy.

- Investment will be needed in collection and resource recovery infrastructure, and facilities for composting, energy-from-waste (anaerobic digestion), C&D processing, and other medium technology reprocessing facilities such as waste soil and storage, remediation facilities and emerging waste stream facilities.

Education for the Community, Schools, Businesses, Government

- simple, consistent messaging to ensure community and business are clear on what materials go where when they no longer want them

- school education programs on the principles of circular economy, encouraging better consumption behaviours,

Facilitating material / supply chain forums to map pathways for materials that include manufacturer, importer, retailer and recycler.

Improving data collection on materials flows, recovery rates to feed into the National Waste Report and National Waste Account.

The role of technology and digitisation should be considered including how the Internet of Things and Blockchain can be used to manage, track and report on materials production and consumption.

Appointing a Circular Economy Commissioner at a state level and advocating for a similar role at a national level. Such a role would serve to facilitate greater collaboration between relevant stakeholders across the supply chain and increase awareness about circular economy.

Allocating additional landfill levy funds to fund the above.

What are the main barriers to the implementation of a circular economy?

- the absence of adequate government policy and legislation
- limited consumer awareness and preferences
- inadequate use of technology to support or manage circular economy activities
- inadequate funding for research and development
- limited collaboration across supply chains

All of the above. Please see our response to the previous question.

SECTION 1 - SUPPORT INNOVATION

How could a new or improved research support platform support a circular economy?

- The transition to a more sustainable circular economy will require innovation, new infrastructure and technology to enhance resource productivity and create business opportunities both locally and overseas.

- Establishing CRCs similar to the Fight Food Waste CRC for the circular economy or priority materials (e.g. glass and plastics) or product types that bring together researchers, producers, manufacturers, retailers/service providers, entrepreneurs, other state governments and recyclers will help drive collaboration and focus research efforts and innovation.

What services and support would you like to see a circular economy innovation hub provide?

- Funding for research, demonstrations, transition of businesses from a linear to circular business models, changing consumption and production behaviours, training and new market development.

- Loans for innovative technologies and equipment.

- Facilitating collaboration with all stakeholders along supply chains.

2. PROACTIVE PROCUREMENT

How do you think the NSW Government could increase the use of re-usable and recyclable material through its purchasing decisions?

- Through both State and local government procurement priority should be given to purchasing products and services that are more durable, have longer life cycle, can be repaired and reused, have a minimum recycled content, or are compostable or recyclable.

- This includes using priority materials like concrete, glass and organics in state and local government infrastructure projects.

- Developing purchasing criteria and mandating preferential procurement of glass fines and recovered crushed glass in civil engineering works.

- Updating material / product standards to include recycled content for construction and landscaping services in consultation with recyclers.

- Developing and implementing a state and local government wide procurement strategy that identifies and prioritises;
    - what products and materials can either be avoided, reused or substituted with recycled content,
    - the barriers to these changes, and
    - how they can be addressed through regulations, subsidies, financial incentives, tendering specifications, research and training of engineers and public sector procurement managers.

Do you have a comment about this focus area?

- The creation of local markets for secondary products is a high priority for the NWRIC. The Council believes that all levels of government should implement policies to procure recycled products and materials. Priority materials include concrete, glass and recovered organics. Further, government can assist in the creation of markets via new product specifications for recycled materials and education programs.

3. HIGH QUALITY, CONSISTENT RECYCLING

What can the NSW Government do to better support the recycling industry?

- Similar to utility services such as electricity, gas and water, waste and resource recovery services are essential for the protection of the health of both the community and the environment's ecosystems.

- Over the next 30 years a greater variety of sophisticated technologies will be needed to sort, recycle and process the increasingly complex materials which may include rare earth metals, mixed polymers and potentially hazardous substances if not processed correctly.

- The transition to a circular economy will require investment and development of new resource recovery infrastructure and technology to enhance resource efficiency and create business opportunities both locally and overseas.

- New infrastructure required will include transport and processing equipment, bins, glass fines cleaning equipment, covered compost and waste to energy facilities, new monitoring technologies, training, market development, business structural adjustment and integrated waste /material /resource data systems.

- Government procurement where priority is given to purchase products and services that are more durable, have longer life cycle, can be repaired and reused, or if shorter lifecycle as a minimum must have a minimum recycled content, or are compostable or recyclable. This includes using important materials like concrete, glass and organics in state and local government infrastructure projects. Further, government can assist in the creation of markets via new product specifications for recycled materials and education programs.

- Investment of additional landfill levy funds to stimulate markets for recycled products.

- Introduce regulated extended producer responsibility schemes for glass, batteries, all electronic and electrical waste, mercury containing products, aerosols and nappies.

- Review the National Environment Protection Measure at both national and State level to ensure that packaging companies and the Australian Packaging Covenant Organisation are penalised if they do not meet agreed packaging targets. Similar to how the National Television and Compute Recycling Scheme operates.

- Ban single-use problematic plastics

- Ban aerosol cans from kerbside recycling bins

- Mandate recycle content in products

- Ban all forms of e-waste and batteries from landfill including photovoltaic panels and related renewables technology.

- Develop and fund a consistent State-wide education "Recycle Right" program that support local councils and businesses in educating their educate residents, staff and customers

4. VALUE ORGANICS

What measures do you think would help organics become more circular and reduce food waste to landfill in NSW?

- Cleaner collection streams, including separating food waste and organics from general waste and where possible having separate food waste and organic collection streams to prevent contamination.

- The NSW Government needs to be actively involved in funding the state implementation of the National Food Waste Strategy, the Fight Food Waste CRC and OzHarvest's Fight Food Waste Campaign.

5. MAINSTREAM PRODUCT STEWARDSHIP

How do you think product stewardship schemes can be expanded, and what products should be included in a product stewardship scheme?

- Introducing regulated extended producer responsibility schemes with a focus on designing out hazardous substances, non-recyclable, non-compositable materials from products and establishing alternate collection systems. Priorities would be for glass, batteries, all electronic and electrical waste, mercury containing products, aerosols and nappies.

- Ideally these schemes should be implemented at a national level using the product Stewardship Act. However, progress at national level has been slow, so Council encourages the State Government to progress state-based schemes for glass and batteries like it did for containers.

- Review the National Environment Protection Measure at both national and State level to ensure that packaging companies and the Australian Packaging Covenant Organisation are penalised if they do not meet agreed packaging targets. Similar to how the National Television and Computer Recycling Scheme operates.

6. RESPONSIBLE PACKAGING

What actions would you like the NSW Government to take to better support these national targets?

- Review the National Environment Protection Measure at both national and State level to ensure that packaging companies and the Australian Packaging Covenant Organisation are penalised if they do not meet agreed packaging targets (e.g. use of Australian Recycling Label on all products, recycled content levels, removable of all non-recyclable / non-compostable packaging.). Similar to how the National Television and Compute Recycling Scheme operates.

- Mandate recycled content in packaging and ban problematic plastics.

- Ban aerosol cans from kerbside recycling bins

8. BETTER DESIGN

How would information on durability and repairability of products impact your purchasing decisions?

- The Council supports improved design to make products more reusable and recyclable, as well as introduction of new source separation and collection initiatives to improve reuse and recycling. Complex product design impedes recycling. To create a circular economy, the Council supports that products must be designed with reuse and recycling in mind.

- Specific guidelines covering design for disassembly, reuse and recycling should be widely promoted to design practitioners with a view to improving awareness and action among product developers and manufacturing companies.

- Design features that address circular economy principles should be specified requirements as part of all procurement processes.

For further information or to discuss any of the above please feel free to contact either myself, rose@nwric.com.au 0418 216 364 or our Secretary, Alex Serpo secretariat@nwric.com.au 0417 932 303.

Yours sincerely,

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