

Waste Strategy Taskforce
GPO Box 787
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Australia

To Whom it May Concern,

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 private capital invested in 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.

Introduction

The NWRIC welcomes the work by the Commonwealth to re-invigorate the *National Waste Policy 2009*. We see this as a great opportunity to move Australia towards a circular economy and make significant in-roads into addressing the challenges facing waste and recycling, including:

- Inconsistent and lack of community and business education on how, what, where, and why to reduce waste and what to do with waste.
- Hazardous waste contaminating recovered materials i.e. asbestos, batteries, tyres
- Low quality recovered materials due to contamination and lack of appropriate processing technology
- Stockpiling, fires and illegal dumping
- Declining overseas markets for recovered materials
- Lack of local markets for recovered materials e.g glass, tyres, papers, plastics, food, clothing
- Growing volumes of organic and food waste
- Poor product and packaging design including material selection, repairability, durability, ease of disassembly, recyclability
- Lack of investment in new processing / recycling / energy from waste technologies
- Lack of research and development into innovative material recovery businesses and jobs through better resource recovery

The NWRIC believes there are three major systemic barriers that need to be addressed to improve waste and recycling in Australia and a move towards a circular economy;

- inconsistent landfill levy pricing and investment between states, to drive material recovery and reuse
- lack of long-term infrastructure planning nationwide, to provide certainty for investment, and
- misdirected policing and implementation of standards by States, to stop poor practices including inappropriate disposal of hazardous wastes.

In considering the draft policy overall the NWRIC believes that priority should be given to

- establishing a National Waste and Recycling Infrastructure plan,
- the 30% government procurement of recycled materials to create markets,
- implementing a common approach to waste regulation, and
- establishing a regulated product stewardship scheme for batteries.

To achieve the Policy's resource recovery targets of 'an 80% resource recovery rate by 2030', and 'halving the amount of organic waste sent to landfill by 2030' **waste and recycling infrastructure capacity will need to be doubled**. Plus, much of the existing major infrastructure will need to be renewed as total waste generated is expected to grow 60% to 100% by the year 2050.

Currently, two States have delivered long term waste and recycling infrastructure plans - Victoria¹ and South Australia² to guide investment and planning and NSW is currently preparing one. The projected job and economic growth opportunities offered in these plans is very encouraging.

For example, the South Australian plan says; "A 30-year high diversion scenario estimates an additional \$660 million in Gross State Product and an additional 4,969 full time equivalent jobs [by 2046]."³ Therefore, a nationwide 'high diversion' scenario could generate more than 70,000 jobs across Australia and \$9.4 billion in new gross national product by 2050.

The **national waste and recycling infrastructure plan** ideally would extend to the year 2050, be a combination of State and Territory plans and be endorsed by all State Government agencies and Local Governments. This plan will ensure the National Waste Policy targets will be achieved delivering economic, environment social benefits to all Australians.

Once the national plan is in place, funding for the infrastructure would come from both the private sector and the growing landfill levies, creating no additional cost to government. Essential waste and recycling activity, if sited carefully, can occur with very minimal or no disruption to communities or businesses while delivering jobs, environmental benefit and economic growth.

With **government procurement**, the NWRIC recommends the Commonwealth focus on those commodities lacking an end market i.e. glass, mixed plastics and paper. Organics is also an important target for government procurement at the local council level.

Waste avoidance and reduction activities as a priority should focus on materials and goods which are toxic and impede recycling. In particular removing asbestos from all waste streams.

¹ [Statewide Waste and Resource Recovery Infrastructure Plan](#).

² [South Australia's Waste and Resource Recovery Infrastructure Plan](#).

³ Foreword - page 5.

The other two most challenging problem waste streams are used lithium ion batteries and tyres. Lithium ion batteries cause fires when pierced, both in facilities and trucks. The hazards created by stockpiles of used tyres are well documented. The NWRIC believes both these products should be **regulated under the Product Stewardship Act** to ensure full producer engagement, rather than relying on partial industry engagement through voluntary approaches. It is only when these schemes are regulated do you see real change as demonstrated by the National Television and Computer Recycling Scheme, the mandatory Oil Stewardship Scheme and more recently the NSW Container Deposit Scheme.

Finally, the NWRIC believes **the Commonwealth government has a vital role to play** in bringing together the States, local councils, the business sector and the waste and recycling industry to work collaboratively in implementing the National Waste Policy and removing the current inequities, false markets, and lack of forward planning to create a more sustainable and circular approach to how we manage our waste and materials.

To this end it is critical that the **Commonwealth Government allocate additional resources this year** to implement the National Waste Policy once it is finalised. Specifically, we recommend the Commonwealth Government;

- appoint and resource a Waste and Recycling Commissioner or similar dedicated role within the Department of Environment (not unlike the Endangered Species Commissioner) to implement the National Waste Policy including development of a National Waste and Recycling Infrastructure Plan, leading / facilitating collaboration across states, local governments, industry and the business sector and delivery of the National Waste Report;
- Provide additional dollars to the Asbestos Safety and Eradication Agency to urgently tag and facilitate the removal of this material.

The NWRIC also believe these resources should be matched by all States committing to invest a minimum of 30% of their landfill levy in implementing waste and recycling actions in their jurisdictions.

All members of the NWRIC are committed to the highest standards in waste management and recycling and are ready to commit resources and work with Commonwealth, State, local government and the business sectors in its implementation of the new National Waste Policy.

More specific responses to each of the principles, targets and strategies is provided below under the relevant sections.

Feedback on Principles, Targets, Strategies and Milestones

1. Avoid Waste

A national target to reduce total waste generated in Australia per capita by 10 per cent by 2030.

1.1 - Do you agree with the proposed target?

Yes. However - we believe the target should be more precisely defined. It is unclear if this about what

householders and businesses throw out into the bin irrespective if it is destined for recycling, waste to energy or landfill. To be consistent with the policy and the SDG it should be waste disposed of by communities and businesses (i.e. avoided waste). Waste diverted from landfill and recycled and recovered should be addressed under Principle 2 Improve Resource Recovery.

1.2 - Is there a different target that should be included?

The NWRIC believes that there should also be a specific hazardous waste generation target for toxic materials which most impede recycling i.e. asbestos and asbestos contaminated materials.

- Between 1930 and 1985, approximately 1.5 million tonnes of asbestos was used in Australia.
- An average of 4,000 people die from asbestos-related diseases each year in Australia, a trend that continues to rise.

1.2a –Should we freeze waste generation at current levels, indexed against population growth

Yes

1.2b Should there be a target to reduce waste to landfill instead of a generation target?

No, avoiding waste in the first place is key.

Industry believes there should be targets that reflect the preferred movement of materials along the waste and recycling chain; i.e. waste generated (decreasing), recycled/recovered (increasing), stockpiled (capped at agreed material levels), waste to energy (where no viable recycling option), waste to landfill (where no viable recycling option)

1.2c - should targets be set separately for MSW, C&I and C&D.

Waste avoidance targets for waste materials generated is more important, as there are certain waste materials that should be targeted first, e.g. hazardous and non-recyclable materials.

However, waste generation targets for each collection channels would be helpful. As it is important knowing how much waste is being collected through each channel. As is understanding the reduction and proper handling of problem waste materials i.e. less hazardous and non-recyclable materials being generated.

1.3 - Do you agree with strategies 1, 2 and 3 related to the proposed milestones if you suggest others please explain why.

The NWRIC recommends that the strategy and milestone to avoid waste through better design be separated from the strategy to avoid waste through sharing and repairing for reuse. As the milestones, actions and responsibilities will be quite different. There is also a need to add in milestones that link to the product stewardship strategy, as these are all key elements of best practice product stewardship. Strategy 3 is confusing and lacks focus.

1.3a Suggested edits to the strategy

Strategy 1 – Design

- Assist businesses avoid waste through better design of systems and products, material selection, durability, disassembly, repairability and recyclability

Milestones

- Businesses across the food supply and consumption chain become signatories to the voluntary commitment program to reduce food waste by 2019.
- Businesses implement actions to avoid waste and support design of products that increases product's lifecycle (including disassembly and repair) by 2020.
- Total waste generated in Australia is reduced by 5 per cent per capita by 2025.
- Food waste halved by 2030, in line with the National Food Waste Strategy.
- Micro beads phased out by 2020.

Strategy 2 – Sharing and Reuse

- Extend the life of products and materials by encouraging efficient use, reuse and repair for reuse.

Milestones

- Reuse targets introduced into the National Television and Computer Recycling Scheme by 2020 as part of the Product Stewardship Review.
- Infrastructure in place to support reuse, repair and sharing of products by 2025.
- Businesses switching from product sales to product leasing business models.

Strategy 3 – Knowledge sharing, education and behaviour change

Milestones:

- Standardised kerbside recycling messaging nationwide by 2019.
- Targeted consumer education strategies Australia wide with evidenced-based messaging for avoiding and reducing waste, sharing repairing, reuse and buying recycled by 2021.
- Australian Recycling Label adopted by 80% of market by 2020.
- Information sharing systems are in place to support sharing, repair and reuse of products by 2025.
- Biannual national survey on community and business waste and recycling awareness and behaviours as part of the National Waste Report.

1.4 - What other action is required to meet the target.

Incentives to encourage businesses to design products so that they last longer and / or are easily repaired

Banning or penalties (e.g. advance recycling fee) import of products that are using materials that are single use and not recyclable.

Action on avoiding clothing waste, this should be driven through the Product Stewardship Act and include fashion brands, retailers and charities.

2. Improve Resource Recovery

A national target of an 80% average recovery rate from all resource recovery streams, following the waste hierarchy, by 2030.

2.1 - Do you agree with the proposed target?

This target needs to be better defined. Is the target talking about volume of materials collected and sent to a recycler / diverted from landfill or material recovered and turned into a raw material from a recycling process?

Both targets are important.

NWRIC supports an 80% **recycling target** i.e. on average 80 % of the waste generated is collected and recycled (i.e. not end up in landfill).

NWRIC also recommends that separate material recovery targets be established by 2020 for different material / product / packaging types. As in the NTCRS where there is a 90% material recovery target. This should be a milestone. The NTCRS material recovery target would make a good case study.

Finally, NWRIC recommends that the principle be renamed Improve Material Recovery rather than Resources. This will alleviate confusion with the Resources Sector in Australia.

2.2 - Is there a different target that should be included?

- should targets only refer to recycling?

- should there be separate targets for municipal solid waste, commercial and industrial waste and construction and demolition waste?

See above. The target needs to be separated into two targets a recycling target (i.e. waste collected and diverted from landfill target) and a material recovery target (i.e. material recovered from a recycling process).

The recycling and recovery challenges (and opportunity) are vastly different for different materials. we believe the best approach is recycling and recovery targets by material type. For example; metals, construction aggregates, glass, paper, plastics, organics, food, ewaste, batteries, and clothing. Organics recycling targets should also include biosolids.

A separate recycling target should also be established for waste to energy/fuel production.

Recycling targets (i.e. diversion from landfill) should be developed for each collection channel as well.

NWRIC also recommends that separate material recovery targets be established by 2020 for different material / product / packaging types like that in the NTCRS where there is a 90% material recovery target. *This should be a milestone. The NTCRS material recovery target would make a good case study.*

It is very important to be consistent in how the terms recycling and recovery are used. They are not interchangeable.

2.3 - Do you agree with strategies 4, 5, 6 and 7, and related proposed milestones? If you suggest others, please explain why.

Strategy 4 - Product Stewardship

The Milestones should include

- *Findings and recommendations of the product stewardship and NTCRS review by implemented by 2019.*

There is no need to review current regulated product stewardship schemes as this will be dealt with the adoption of the prioritization framework.

Priority should be given to regulating a battery stewardship scheme over a photovoltaics scheme. Trying

to pursue a voluntary battery scheme will not work as Duracell and Energiser have clearly indicated they will not participate in the proposed voluntary ACCC approach. Batteries are a major contaminant and fire risk to recycling.

The current voluntary ACCC approach of Tyre Stewardship Australia is not achieving its objectives. The accreditation scheme is not stopping the stockpiling of tyres.

All tyre and battery manufacturers, brands and importers must step up and accept their producer responsibilities. Experience shows that regulation to prevent free riding is a minimum requirement to ensure genuine environmental outcomes are achieved in a timely manner. As illustrated by the success of the co-regulatory National Television and Computer Recycling Scheme, the mandatory Oil Stewardship Scheme and more recently the Container Deposit Scheme in NSW.

Strategy 5 – A common approach

This is a key strategy that will make significant improvements and remove market distortions and barriers to resource recovery and creating a circular economy. The NWRIC considers the primary focus should be placed on landfill levies, ensuring they are harmonised and priced accordingly between states to drive waste up the hierarchy and that the landfill levies are invested in waste and recycling infrastructure, community education and policing the industry.

Strategy 7 – Increasing Industry Capacity

The NWRIC recommends the following milestones be added and the current Victorian and SA plans would make excellent case studies.

- All States have waste and recycling infrastructure plans in place by end of 2019
- National waste and recycling infrastructure plan completed by 2020
- All State and national waste and recycling infrastructure plans reviewed every 10 years

2.4 - What other action is required to meet the target?

Along with policing, planning and improved levies, the NWRIC propose a national strategy to analyse and improve the export competitiveness of Australian recycled materials.

High landfill levies reduce the export competitiveness of Australian recycled materials. Where materials are trade-exposed, levy deductions should be considered. These deductions should only apply as a deduction once materials are exported.

Additional hypothecation of landfill levies back to the industry can also assist to lift recycling rates. We recommend the Commonwealth consider a national hypothecation rate of 30%, with funds given out via loans not grants.

2.5 - Who should be responsible for implementation?

Improving waste and recycling in Australia will require a whole of government approach. This includes all three tiers of government along with the State Agencies responsible for planning, infrastructure, taxation, environment and occupational health.

3. Increase use of recycled material and build demand and markets of recycled products

A national target of 30 per cent average recycled content across all goods and infrastructure procurement by 2030.

3.1 Do you agree with the proposed target?

Yes. We believe this target is the highest immediate priority for the Commonwealth and State plus local Governments, particularly in the context of China's 'National Sword and Blue Sky' policy.

3.2 Is there a different target that should be included?

In the context of China's National Sword and Blue Sky policies, government procurement should target materials exposed to unstable export markets. We believe that currently the materials with the highest priority for government procurement are;

1. Glass,
2. Plastics,
3. Organics, and
4. Paper.

If implemented properly, domestic procurement should be enough to absorb recycled materials from domestic generation. Glass for construction aggregates is the simplest and cheapest place to begin.

Local Government are key players in this sphere. Local Government kerbside collection contracts could include provision for the repurchasing of recycled materials, especially in construction projects. Roads authorities at National, State and Local government levels will be key to improving procurement of construction aggregates.

3.3 Do you agree with strategies 8 and 9 and related proposed milestones? If you suggest others, please explain why.

Yes. Other actions are required. State and local government procurement will be key. Infrastructure projects can absorb recycled materials including glass, paper, plastic and construction aggregates.

3.4 What other action is required to meet the target?

In some cases, contamination protocols will be required. For example; in the case of glass, the approval of an 'asbestos' protocol is required to ensure that materials can still flow through to recycling. Such protocols should also apply to organics and construction aggregates and be harmonised across all jurisdictions.

3.5 Who should be responsible for implementation?

Meeting this target will require close collaboration between industry and government.

4. Better manage material flows to benefit human health, the environment and the economy

(a) phase out problematic and unnecessary plastics by 2030.

(b) halve the volume of organic waste sent to landfill by 2030.

4.1 Do you agree with the proposed targets?

Yes.

4.2 - Is there a different target that should be included?

Even with enhanced efforts to generate less plastic waste, millions of tonnes will still be available for recycling or energy recovery. Government can work actively to improve plastic recycling.

- An efficient strategy to improve plastics recycling is to support the implementation of a container deposit schemes in Victoria and Tasmania.
- Local Government procurement of mixed plastics (unsuitable for remanufacture) for infrastructure projects will assist in diverting these materials from landfill.
- Improved education for source separation will help to recover additional plastics.

4.3 - Do you agree with strategies 10, 11 and 12, and related proposed milestones? If you suggest others, please explain why.

Yes, we agree.

Strategy 11, which deals with hazardous waste is particularly important. High priority wastes include asbestos, batteries and tyres. PFOS/PFAS contaminated waste is a risk and investment should be made to contain this material. Given the capacity of PFOS/PFAS contaminated materials to contaminate groundwater, the NWRIC reiterates that all landfill cells in Australia should be lined. The Commonwealth should identify and ratify a national landfill standard through the Heads of EPA (HEPA) Group.

The NWRIC also supports the introduction of e-waste tracking to prevent the illegal export of hazardous materials and e-waste training for collectors and recyclers on the safe handling and processing of e-waste.

Diversion of batteries from landfill through a regulated product stewardship scheme should be by 2020 not 2025. Batteries are currently a significant contaminate, safety and fire risk for kerbside recycling and processors. A separate collection and processing channels are required as a matter of urgency and this should be funded by the battery industry.

Strategy 12

There is roughly three times more organics than plastics sent to landfill. Australia generated 13.7 million tonnes of organics in 2010-2011 and likely generates closer to 15-16 million tonnes per year currently, meaning there is likely 7-8 million tonnes of organics to landfill that could be diverted to composting.

Halving this value will require 3-4 million tonnes of new organics processing capacity. Similarly, 2-3 million tonnes of plastics go to landfill.⁴

Therefore, improving organics recovery will require extensive investment, employment and innovation. It is a large opportunity. The Commonwealth approach to organics targets food waste, however, it is also important to develop recovery pathways for biosolids, commercial, and industrial organics streams. These include abattoir wastes and commercial food manufacturing.

Organics recycling is a key area of innovation. The cost of high-quality organics recycling is in the order of \$80-150 per tonne, depending on the complexity of the stream. Therefore, in many locations' organics recovery is quickly becoming cheaper than putrescible landfill. However, effective organics recovery requires ready consistent markets and planning for organic processing assets. Improved source separation and education will also be necessary to improve organics recovery from households.

The mandating of recovered compost in mine site rehabilitation will assist in developing markets. So, will effective planning for organics recovery facilities.

The industry is ready to supply high quality food and garden organics recovery (FOGO) services to households.

The Commonwealth should expand opportunities to credit building soil carbon from compost under the Emissions Reduction Fund.

4.4 - What other action is required to meet the targets?

It is difficult to comment on the plastics target without a definition of 'problematic and unnecessary'. The current barriers to increasing plastic recycling include; contamination in kerbside and commercial commingled recycling bins, limited domestic markets, a lack of government procurement, increasingly complex packaging and poor labelling for recycling.

4.5 - Who should be responsible for implementation?

The Commonwealth and States can deliver infrastructure plans and tenders to divert commercial and domestic organics back to soils. Local Government can procure organics and plastics. Industry can deliver organics processing capacity and recover resources.

5. Improve information to support innovation, guide investment and enable informed consumer decisions

A national target for fit-for-purpose and timely data to be available for individuals, businesses, and governments to make informed decisions.

5.1 Do you agree with the proposed target?

Yes. Data is important in informing market and infrastructure development, monitoring changes in community awareness, attitudes and behaviours; monitoring performance against environmental and OH&S targets and assisting with policing for the industry. Policing means both ensuring consistency of standards and mitigation of waste crime and fraud. More detail is provided below.

⁴ [Extrapolated from the National Waste Account.](#)

5.2 Is there a different target that should be included?

Having data available in a timely manner at a National and State level is key to good decision making and the implementation of this policy. Data collection and reporting can also help monitor consistency nationally in policing the industry, standards and preventing fraud, which is important in ensuring a fair market for the waste and recycling industry.

Consumer awareness, attitudes and behaviours should also be tracked nationally. As changing consumer behaviours is also key to the success of this policy.

To ensure the data captured is meaningful the NWRIC believes all waste facilities should be licenced and all waste transporters should be registered. Licence inspections should be applied equally to all facilities, standards must be applied universally. All waste facilities should provide mass balance reporting, as this is an important step measuring how we are progressing towards the circular economy.

5.3 Do you agree with strategies 13 and 14 and related proposed milestones? If you suggest others, please explain why.

Strategy 13 – Data and Reporting

Data for investment - In regard to market and infrastructure development, improved data can help inform waste infrastructure plans. These plans should be based on accurate data extrapolation of growth in the waste market. The NWRIC submits the following data should be published; waste generation and material recovery data at State and National level, the National Waste Accounts from the ABS, future infrastructure needs to support new services,

Data for tracking and policing - The NWRIC supports that every waste facility in Australia should be licensed - irrespective of size. Licensing should include that all landfills must have weighbridges and report received tonnes to the State Government authorities.

Data can be used to inform EPA inspections. EPA inspections should be across all facilities, not just large or licenced facilities. State EPAs should be further funded to police and collect information on standards and regulation. The NWRIC support that additional landfill levy funds be committed to invest into databases, additional licensing/tracking programs and other monitoring programs such as drones.

All waste transporters should be registered with State EPAs. GPS trackers on trucks should be mandatory. When suspected of a breach of the law, GPS data could provide an important tool in prosecution and investigation. Data reporting requirements should be the same for both local government and industry.

Strategy 14 -

A national waste market report should be produced every two years along with the National Waste Report

5.4 What other action is required to meet the target?

Information technology investment will be needed to enhance reporting and data collection for policing and mass balance reporting. This includes new licence databases the collection of mass balance data. The NWRIC recommends that EPAs make the provision of GPS tracking on waste trucks mandatory.

5.5 Who should be responsible for implementation?

The Commonwealth should fund aggregated national waste accounts through the Australian Bureau of Statistics (ABS) and conduct a regular community awareness, attitudes and behaviour survey.

State EPAs should be responsible for compliance and auditing data.

All waste industry should collect mass balance data for waste facilities and GPS data from waste collection trucks.

Further Consultation

The NWRIC welcomes further consultation on any of the recommendation included in this submission.

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