

4 October 2019

Policy and Business Branch  
Department of Primary Industries, Park, Water and the Environment

WAP.Enquiries@dpipwe.tas.gov.au

Dear Sir or Madam


**Tasmanian Draft Waste Action Plan**

Thank you for the opportunity to provide a submission on the Draft Waste Action Plan. This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of the Local Government Sector in collaboration with our Members, all 29 Local Councils in Tasmania.

LGAT is incorporated under the *Local Government Act 1993* and is the representative body and advocate for Local Government in Tasmania. Where a Council has made a direct submission to this process, any omission of specific comments made by that Council in this submission should not be viewed as lack of support by the LGAT for that specific issue.

If you have any questions or would like further information, please do not hesitate to contact Dion Lester at [dion.lester@lgat.tas.gov.au](mailto:dion.lester@lgat.tas.gov.au) or via phone on (03) 6246 3740

Yours sincerely,



Katrena Stephenson  
**CHIEF EXECUTIVE OFFICER**

## LGAT Submission: Tasmanian Draft Waste Action Plan

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### Introduction

The Tasmanian Government is at a crossroads. Local Government and the community have been calling for leadership and action on waste for several years. Consequently, we welcome the release of the draft Waste Action Plan (WAP) for consultation and particularly the commitment to a statewide waste levy and container refund scheme. However, the WAP does not deliver the clarity and leadership required in adopting a circular economy, particularly in the face of significant global, national and state pressures related to resource use and waste management.

There is a significant opportunity for our state in adopting a circular economy, however the WAP lacks a clear framework, principles, objectives and specific plans for how our state will unlock waste as a resource, so that we can create jobs in new industries and reduce landfill. Local Government, industry and the community are ready to commence this transition, evidenced by the highly successful Food and Waste System Forum recently held at Parliament House. The event brought together leaders and decision makers from government, business, industry, community and research to:

- Identify key priorities in our food and waste systems, including a preliminary set of measurable 2030 goals and targets;
- Identify solutions in Tasmania that are advancing more sustainable food and waste systems; and
- Co-create a roadmap to coordinate greater action to deliver the goals and targets.

Feedback from the participants was overwhelmingly positive, with a significant desire to continue to work together towards achieving a Circular Food Economy in Tasmania.

The opportunities to unlock the value of waste at an industry level are immense but require significant coordination and collaboration from our State Government, as well as real on-ground action.

### General Comments

The following section provides overarching commentary against the key Focus Areas and Actions within the WAP. **Attachment 1** provides additional specific comments against each Action.

### Statewide Waste Levy

Implementation of a statewide waste levy is strongly supported by the Local Government Sector, but it will be critical to work closely together to deliver the right model for

Tasmania. In particular, a statewide waste levy must be fully hypothecated to fund a range of waste management and resource recovery services and projects.

Pricing mechanisms are used internationally and in most Australian states to achieve targets for diverting waste from landfill and to help fund waste reduction activities. The application of a landfill levy is widely held to be the most effective financial lever to divert waste from landfills into resource recovery activities, provided the quantum is sufficient to encourage behavioral change.

In the absence of a statewide levy, Tasmanian landfill prices are amongst the lowest in the country and low landfill prices equate to poor resource recovery. This lack of a statewide landfill levy has created a market environment in our state where resource recovery has a limited capacity to compete with landfill. The low landfill diversion rates result in a low economic benefit from the waste and recycling sector and the loss of the value of recoverable resource. Resource recovery operations employ more people and require greater investment in infrastructure per tonne of material processed compared to landfills.

The current regional and Local Government levies are not adequate to significantly encourage investment in resource recovery by private industry. Additionally, these are applied inconsistently across the state, and consequently waste is likely to be being transported greater distances than necessary in order to realise gate fee savings. In some instances, long-term contracts are a barrier to regional/Local Government landfill operators implementing and/or altering levies.

The implementation of a waste levy needs to be thoroughly considered, and lessons can be learned from other jurisdictions. For example, South Australia recently suffered extreme negativity following a decision to raise the levy considerably without appropriate consultation. Applying levies can impact existing contracts that have not catered for a levy or assumed a lower levy. Queensland has a curious history with their levy being implemented, then withdrawn, then re-implemented. Long term modelling needs to be undertaken and all stakeholders informed throughout the process, and legislative frameworks need to be implemented to ensure future governments cannot repeal or dramatically alter the levy.

This can also be applied to a Container Refund Scheme, where planning needs to consider what has been undertaken elsewhere, and the lessons learned.

The principles of good levy design include:

- Introduce a landfill levy at an appropriate price, with gradual increases over time until the desired level is achieved;

- Provide sufficient lead time and phasing in of the levy to allow the market to respond and transition to the new regulatory environment;
- Levy pricing should provide clear and credible projections, providing industry with certainty and informing investment decision-making;
- Levies should be applied as broadly and consistently as possible to limit the risk of intentional reclassification of some waste, reducing the effectiveness of the levy;
- Exemptions should be kept to a minimum and only granted in accordance with clear, statutorily defined criteria; and
- There needs to be a mechanism for a differential levy structure, having regard to the relative capacity of regions to divert waste to recycling and other facilities. Taking account of socio-economic differences, lack of waste recovery infrastructure and distances (and associated higher transportation costs) in rural and regional areas. This will be particularly important for municipalities such as King Island, Flinders and West Coast Councils.

The Tasmanian Government must provide clear direction on the application of levy revenue. To promote stakeholder acceptance of the need for a levy, the proceeds should be used to fund initiatives in areas such as waste avoidance, market development, recovery and recycling infrastructure, education, increased compliance and enforcement and promoting regional collaboration.

Effective compliance and enforcement are fundamental to the success of any policy and regulatory regime. The intent of legislation and regulation is to shape behaviour and sanction breaches where necessary. In other states, the introduction of, or any significant increase in, a waste levy has generally been the precursor to an escalation in illegal dumping and stockpiling activities. In order for the State to mitigate this risk (or address the unintended consequences), a range of targeted monitoring and enforcement programs will need to be implemented.

The first line of defence is the enforcement capability of the regulators (EPA and Local Government). Appropriate resourcing is required to be both responsive and proactive in engaging with industry and the community. In addition, there needs to be a suite of monitoring and compliance controls and instruments developed or applied to support the effectiveness of regulation and compliance. Data will play a crucial role and is discussed in more detail later in this submission. Without the right data, it will be difficult to understand the effectiveness of regulations and gaps that may allow non-compliance activities. To improve regulation and compliance awareness, the Government must also roll out a fit-for-purpose education program, with target audiences ranging from waste producers to waste and recycling facility operators.

### **Container Refund Scheme**

Local Government welcomes the introduction of a Container Refund Scheme (CRS). It is well documented that the benefits of such a Scheme include increased resource recovery, a reduction in litter and an increase in community awareness and involvement in waste management.

Other jurisdictions have found that the design of their CRS can be captured by the beverage industry, who unsurprisingly seek to influence the Schemes to limit the return rate of containers. While the beverage industry should be a stakeholder in the design and development of a CRS for Tasmania, it must not be the dominant driver. The resource recovery, logistics, not-for-profit and Local Government sectors are critical stakeholders whose participation in Scheme design is paramount.

### **Moving to a Circular Economy**

In Tasmania, there appears to have been limited discussion, outside of the waste management industry, on what a Circular Economy is, and if a move to a Circular Economy is an approach that would benefit the State. However, the Circular Economy is becoming a mainstream focus for industry development, waste and resource recovery policies in many jurisdictions. The European Union has taken a strong lead with *Closing the Loop—An EU action plan for a Circular Economy*, which is supported by national strategies in Denmark, Finland, France, Germany, the Netherlands and Scotland. Waste strategies in England, Wales and Canada explicitly target circular practices and China and Japan are implementing a circular approach to reduce their reliance on raw materials. Cities, such as San Francisco and Amsterdam, are also playing an important role in leading the shift at a subnational level. In Australia, most mainland states are investigating what a circular economy would look like for their communities.

Research and analysis from Australia and overseas have shown that transitioning to a Circular Economy can create jobs and contribute to economic growth<sup>1</sup>. Modelling undertaken in NSW<sup>2</sup> and South Australia<sup>3</sup> indicates that material efficiency gains could deliver significant long-term job growth compared to a ‘business as usual’ scenario. South Australia, which already has a current recovery rate of over 80 per cent, has estimated that moving to a Circular Economy could create an additional 25,700 jobs within the state by 2030<sup>4</sup>. Recognising and responding to this shift is important for Tasmania’s national and international competitiveness.

The Circular Economy approach has potential to change the way waste is viewed and lead to a shift in how products are developed and services provided. However, such a move

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<sup>1</sup> McCarthy, Dellink, and Bibas, *The Macroeconomics of the Circular Economy Transition: A Critical Review of Modelling Approaches*. OECD Environment Working Papers, 2018(130).

<sup>2</sup> NSW EPA, *Too good to waste - Discussion paper on a circular economy approach for NSW 2018*, NSW Government Sydney.

<sup>3</sup> Green Industries SA, *Benefits of a circular economy in South Australia 2017*, Government of South Australia Adelaide.

<sup>4</sup> Ibid

will require a considerable change to Tasmania's current economic system, which will require a whole of Government approach. Local Government believes the Circular Economy could bring significant benefits to not only the waste management industry in Tasmania, but also the economy more broadly. However, detailed analysis of the Circular Economy in a Tasmanian context is required to understand and quantify the costs and benefits of moving to this approach.

The Government needs to clearly identify its position and commitment regarding the Circular Economy and outline its roadmap for transitioning to this different economic system. The roadmap should consider how the economy is currently structured and what policy tools could be used to address priority issues over and above the high-level targets provided in the WAP. The changes to the structure of the economy would initially require incentives to encourage businesses to change their operating model and to create markets for waste materials that would eventually need to become self-sustaining.

When considering what a Circular Economy would mean for Tasmania, it is important to clearly define:

- The scale of the Circular Economy to be adopted - local, regional, state or national;
- The type of benefits that could be realised in Tasmania and the associated adjustment costs (e.g. implications for jobs and economic growth); and
- How other jurisdictions with similar structures and challenges to Tasmania have approached the Circular Economy.

To achieve a shift towards a Circular Economy there is a need to foster cross-government collaboration on resource recovery and waste management issues in the first instance. While the final WAP should incorporate principles that set a path to the Circular Economy, a standalone policy statement on the Circular Economy should be developed as a priority to signal to industry where Tasmania is heading and to guide infrastructure and investment planning during the transitional period and over the longer-term.

As a starting point the Final WAP needs to demonstrate how it will link to other existing Government strategies and policies.

## **Governance**

The waste and resource recovery industry has a myriad of touchpoints with different agencies and levels of government and operates within a complex and evolving legislative and policy environment. Tasmania does not have a dedicated body with capacity to provide advice on statewide waste issues to the Tasmanian Government and which has the resources to deliver statewide programs. For example, Sustainability Victoria, Green Industries South Australia and the Western Australian Waste Authority all have strategic

planning and program delivery roles with guaranteed core funding hypothecated from a landfill levy.

In the absence of a single statewide body responsible for implementing the WAP, there is a significant risk of different understandings of who has ownership of the WAP's implementation and which party is responsible for implementing individual actions. Local Government considers that a coordinated and effective agency must drive the implementation of the WAP. This is particularly relevant for the delivery of waste related policy, strategy, planning, statewide data collection and analysis, coordination of education, Government procurement support and market development. The current Departmental structure does not appear to facilitate easy collaboration across Departments and as a result there could be limited coordination in the approaches of multiple agencies delivering on the WAP. This will make it difficult to effectively influence the decisions of business, the waste management industry and other Government agencies.

The development of the WAP presents an opportunity to review Tasmania's existing governance framework.

The final WAP requires an organisation to lead and provide oversight of its implementation and funding to deliver programs and or strategic actions. Understanding what this might look like has been an area of investigation by LGAT on behalf of Local Government over the past 12 months.

### **Statewide Waste Arrangements Feasibility Study**

At the July 2018 General Meeting, councils endorsed LGAT undertaking a feasibility study into Statewide Waste Arrangements (the Feasibility Study). The final report is now complete and is available on the LGAT website under [Media and Publications > Reports and Submissions](#).

The Local Government sector considered the recommendations in the Feasibility Study at its General Meeting on 13 September 2019 and overwhelmingly provided in principle endorsement of the recommendations, and in particular numbers two and four included below. LGAT has been instructed to commence discussions with the State Government on the proposed model to gain an understanding of the level of support for the arrangements, as well as the proposed implementation network (co-investment funding model).

#### **Recommendation 2**

*That LGAT accept a formal shared collaboration structure, co-owned by and accountable to State and Local Government, as the preferred option to deliver the statewide waste management arrangement.*



#### **Recommendation 4**

*That LGAT pursue a co-investment funding model (involving State and Local Government) to enable the implementation arrangement from 1 July 2020 for a period of two years.*

*This option sets out a model that formally partners Local Government and State Government in leading a statewide arrangement (see Figure 6<sup>5</sup>). The aim is to pair the historic progress made and competencies held by local governments and their regional bodies with the Tasmanian Government's ability to formally represent the state, enforce regulations, and enact legislation.*

Tasmanian councils have indicated they believe there is significant merit in our sector and the State Government collaborating via a formal partnership to lead the delivery of the final WAP and ongoing strategic management of waste management and resource recovery in this State. The immediate co-investment proposed will enable, via an agreed work plan, progress towards formation of the preferred ongoing arrangement and establishment of statewide functions and activities to complement regional and local actions.

The proposed arrangements (Option 3 in the Feasibility Study) brings together the comparative strengths in local and regional functions and service delivery experience, with the state's formal representation, regulation and lawmaking capacity. The collaboration model allows for the statewide waste management arrangement to directly use local and regional networks to identify issues. It can also ensure strategies and action plans take account of issues raised regionally and also the decision processes required of Local Government. For example, it will offer a suitable delivery vehicle to implement the final WAP and arguably help to fill many of the gaps in the draft WAP highlighted throughout this submission.

A statewide body can deliver a critical role in brokering and coordinating partnerships between sectors at local, regional and state scales; and applying its functions to drive more resource efficient practices in line with Circular Economy principles. Over time, its influence could extend from a focus on waste and resource recovery market interventions to impact activities 'upstream' of waste management (such as influencing purchasing decisions, supply chains, production systems, and product specifications) as well as those that are 'downstream' (such as developing new markets and unblocking impediments to market access).

There must be agreement regarding shared responsibility to implement the WAP, between Governments and the waste management industry to deliver improved waste

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<sup>5</sup> In the Part B Report available on the LGAT website



avoidance, resource recovery and consequent diversion of material from landfill. Roles and responsibilities must be clearly negotiated, understood and agreed to by all stakeholders.

### **Data, Innovation Networks and Resource Recovery Targets**

Unlike most jurisdictions, Tasmania has not established clear performance targets for resource recovery. Statewide waste resource recovery data collection management systems are required to monitor and evaluate effectiveness of programs and provide public transparency on the progress toward Tasmanian waste and resource recovery goals.

#### **Data**

Effective decision-making by governments, business, industry and the community, must be supported by reliable, timely and relevant information, including data on material composition, volumes, consumption streams, locations, movements and ultimate fate.

The current absence of data and targets inhibits the comparison of the performance of regions and municipalities against state objectives and/or to identify a need for support or targeted programs. As a minimum data management systems and resources to collect, quality check and disseminate data are required to establish statewide waste baseline data (e.g. waste generation and recovery rate) and to monitor against performance targets.

To support the better use of resources and resource recovery, Government needs to collect and communicate enough information to support investment, inspire public confidence, prevent levy avoidance and facilitate continuous improvement. However, measuring progress towards the Circular Economy also requires a rethink of the traditional indicators and the evidence base required. Whilst it will be essential to ascertain how materials are kept in circulation through reuse and recycling, and other efforts to divert materials from landfill, it is also important to recognise and measure the economic benefits such as the greater jobs, investment in resource recovery and productivity improvements.

#### **Targets**

Targets should be based on modelling of realistic configurations of infrastructure, engagement and service delivery, with due regard to the differences between metropolitan and regional areas. The methodology used to develop the WAP targets has not been provided. The Waste Strategies adopted by other jurisdictions clearly explain

what rationale and data have been used to set targets. For example, targets for municipal solid waste (MSW), commercial and industrial (C&I) and construction and demolition (C&D) waste streams in the South Australian Waste Strategy 2015-2020 are based on a detailed analysis that was undertaken as part of the Review of South Australia's Waste Strategy 2011–2015, annual recycling activity surveys and Zero Waste SA's own internal analysis. Similarly, targets for the MSW, C&I and C&D waste streams of the NSW Waste Avoidance and Resource Recovery Strategy 2014-21 are based on an independent modelling study conducted on behalf of the EPA.

What analysis and modelling has been undertaken to inform the development of the targets in the WAP?

The WAP fails to detail how targets will drive improvements in the recovery of specific materials. To change behaviours and focus activity, there needs to be a combination of strategies grouped around knowledge, enabling infrastructure and incentives. Knowledge plays an important role in getting individuals and organisations started on behavioural change, but it is only a start. Knowledge needs to be complemented with the incentives and the practical support individuals and organisations need to act on their decision to change behaviours. Access to appropriate enabling infrastructure is critical in allowing individuals and organisations to engage with waste management options to improve their effectiveness and efficiency. Enabling infrastructure includes the physical facilities necessary to manage waste, as well as the organisational structures of government and legislation applying to individuals and organisations.

Appropriate knowledge and enabling infrastructure can assist in removing barriers to behaviour change, and incentives can provide a driving force for change. Incentives can be positive, such as funding, or negative, such as penalties and compliance actions.

The final WAP needs to detail how the targets will drive improvements in the recovery of specific materials through a combination of strategies grouped around knowledge, enabling infrastructure and incentives.

### **Priority Materials**

Have the highest priority wastes for Tasmania been identified? Will they be?

In order for the resource recovery targets to be achieved there is a need for implementation/action plans to be included in the final WAP on priority issues and materials. It is difficult to identify the methodology that will be used to determine priorities from the information provided in the WAP. Local Government suggests that the focus of the final WAP, as communicated through targets, should also determine priority materials. For example, if the aim of the WAP is to divert tonnes from landfill, materials such as organics and C&D waste will become high priority materials. However, if the WAP

is designed to pursue the adoption of a Circular Economy, an assessment of available materials and where they can be used will determine priority.

By way of illustration, and to inform consideration of the priority areas the WAP needs to address, the LGAT Statewide Waste Feasibility Study previously discussed, captured stakeholder interests across Local Government, regional authorities, the Tasmanian Government and the resource recovery sector. As part of this engagement, four problem areas were identified by stakeholders as priorities:

1. Poor cohesion in the demand for organics recovery services;
2. Insecure market for investing in recovery infrastructure;
3. Risks and harms incurred by tyre stockpiles and illegal dumping; and
4. Resource inefficient use of single use plastics and packaging.

**Attachment 2** presents Investment Logic Map (ILM) outputs for the four agreed problem areas that a statewide arrangement (and the WAP) could prioritise. Four diagrams were then prepared; drawing on stakeholder views on the nature of problems, benefits and potential functions relating to those problem areas. These functions define the scope of roles and inform the procedural objectives that need to be delivered. Each diagram is accompanied by a set of bullet points that explains why a problem is perceived in that area and why action is justified.

This work illustrates the type of plan that needs to be developed for the final WAP on priority materials.

### **Infrastructure Planning**

The capacity of Tasmania's statewide waste and resource recovery system to manage the current and likely future need has been untested. Infrastructure planning is required to:

- Identify the existing critical waste infrastructure required to guarantee delivery of essential waste and resource recovery services;
- Address future infrastructure gaps likely to arise from population and economic growth (including landfill airspace);
- Identify appropriately zoned precincts for future developments and ensure adequate buffers;
- Identify contingency arrangements for emergency events and/or natural disasters; and
- Provide a roadmap to achieve a mix of infrastructure that will maximise the recovery of valuable resources and minimise the environmental and public health impact on Tasmania's communities.

## Support Resource Recovery across Industry

A range of issues in the current resource recovery system have been identified that prevent greater resource recovery; including infrastructure, services and the recovery of priority materials. Significant opportunities exist for improving resource recovery rates which target priority materials such as organics, materials from the C&D sector, optimising kerbside systems, upgrade of Local Government infrastructure to best practice and addressing more efficient collection of problematic wastes such as hazardous household wastes. For each of these, local solutions are particularly important, as access to markets is limited in Tasmania, and transport costs and impacts are high. Tasmania also has a significant opportunity to benefit from greater local recovery and recycling activity.

The final WAP must focus on identifying and prioritising local market solutions for those recyclable materials traditionally exported from the state. Attracting investment into local reuse options requires a degree of certainty which has not been present under standard market conditions in Tasmania. This will rely on procurement decisions recognising the benefits that local reprocessing, and the use of products made locally from recycled materials, can offer compared to national or international export options. The WAP is silent on Government procurement targets.

Councils and regional waste authorities are the primary waste managers that provide household waste collection and recycling services, manage and operate landfill sites, and deliver education and awareness programs. They also provide information, infrastructure and incentives that encourage behaviour change and plan for the management of waste within their local areas. With increased support it is councils and regional waste authorities that will identify local, fit-for-purpose solutions working with their local industries that align with the final WAP and support a move towards becoming a Circular Economy.

The recent disruptions to the global trade in recyclables have created major challenges in the short-term for some parts of Tasmania. However, with appropriate market development there is an opportunity for a number of existing and new Tasmanian businesses to scale up or find new, productive uses for much of the recycled materials that we traditionally exported. To support this transition, the Tasmanian Government must consider its role (and that of Local Government) in driving better material outcomes, particularly by:

- Purchasing more products made from recycled materials; and
- Using more recycled materials in the construction of roads, buildings and other civil infrastructure, for example.

## **Education and Community Engagement**

In recent decades, there has been increasing awareness of the impact of waste on the environment, and the need to adopt more sustainable habits and practices of production, consumption and disposal. However, there are still multiple barriers to change in Tasmania. For example, awareness still remains low (particularly in a practical, day-to-day sense) and for those who are aware, there is uncertainty about what action to take and the reliability of the end to end processes, a situation made more acute by the recent challenges with kerbside recycling.

To overcome these barriers, a cohesive, high-impact education strategy is required at a whole-of-state level. This will require collaboration across all levels of government, informed by community and industry input. Roles and responsibilities for education should be clearly articulated in a Government education strategy, with funding and incentives linked to education outcomes and objectives.

## **State and National Policy and Regulatory Settings**

A clear policy commitment is required to evaluate and implement national product stewardship schemes which provide a cost/benefit to the state. State leadership, support and co-ordination is required to ensure the success of extended producer responsibility programs.

To date, a lack of State Government advocacy and support for implementation of national product schemes has resulted in additional costs to Local Government and poor outcomes for the state.

## **Conclusion**

All Australian states and territories, except Northern Territory and Queensland, divert a significantly greater percentage of material from landfill. The Tasmanian landfill diversion rate is significantly lower than the national average and almost half that of the ACT, NSW, Victoria and South Australia.

In order to unlock waste as a resource, so that we can create jobs in new industries and reduce landfill, we need a tangible commitment and action from the State Government. The opportunities to realise the value of waste at an industry level are immense. While the draft WAP provides a useful starting point, as outlined in this submission there is significant further work required in producing the final WAP to drive the significant coordination and collaboration necessary from the State Government, as well as real on-ground action. Without this Tasmania risks missing out on the significant opportunities that improved resource recovery offers.

AREA & ACTIONS	COMMENTS
<p><b>1. Circular Economy</b></p> <p>No Actions</p>	<p>Local Government is supportive of moving towards a circular economy and promoting and adopting circular economy principals.</p> <p>However, no actions are listed regarding this focus area.</p>
<p><b>2. Governance</b></p> <p>Investigate and discuss models for waste management governance with Local Government.</p> <p>Establish a relevant administrative structure.</p>	<p>Local Government is supportive of development of a state-wide governance model. Councils and regional waste authorities have been actively involved in providing input into the feasibility study into a statewide waste arrangement (as discussed earlier in this submission) coordinated by LGAT, with support from the EPA. The Study has gained support from Local Government and feedback from the resource recovery industry is also positive.</p>
<p><b>3. Data, Innovation Networks and Resource Recovery Targets</b></p> <p>Help to support the establishment of standardised data management systems to capture waste data, to monitor progress against targets and facilitate businesses investment in resource recovery. Develop and support waste-related innovation and research networks in the bioeconomy, agritech, tourism, education (STEM), and renewable energy sectors. Adopt the following targets for waste and resource recovery:</p> <ul style="list-style-type: none"> <li>• Reduce waste generated in Tasmania by 5% per person by 2025 and 10% by 2030;</li> <li>• Ensure 100% of packaging is reusable, recyclable or compostable by 2025;</li> <li>• Achieve a 40% average recovery rate from all waste streams by 2025 and 80% by 2030;</li> <li>• Have the lowest incidence of littering in the country by 2023;</li> <li>• Reduce the volume of organic waste sent to landfill by 25% by 2025 and 50% by 2030; and</li> </ul>	<p>Standardising data has been a common theme amongst Local Government and industry for a long time. This is applicable not only to Tasmania but also to national waste data reporting. Any action led by the State in this regard is welcomed.</p> <p>Consideration needs to be given to how to obtain data from no-regulated or informal waste and recycling treatment options. There is also development needed on how it is proposed to appropriately capture data on litter (as there is a target for Tasmania having the lowest litter rates by 2023)</p> <p>The targets within the plan mirror the targets agreed to by the Environment Ministers under the National Waste Policy. It is positive that targets are being adopted, as the government has been lobbied to do for some time.</p> <p>While targets are listed and supported, the State Government is not responsible for provision of waste services, operating landfills or recycling facilities, and other than through legislative frameworks, cannot enforce operators or Local Governments to meet targets.</p>

<ul style="list-style-type: none"> <li>• Work at the national level and with Local Government and businesses in Tasmania to help phase out problematic and unnecessary plastics by 2030.</li> </ul>	
<p><b>4. Infrastructure Planning</b></p> <p>Develop a Tasmanian Waste and Resource Recovery Infrastructure Plan by 2021. Work with Local Government to address potential planning issues around waste management and resource recovery infrastructure.</p>	<p>Local Government is supportive of the development of a Waste and Resource Recovery Infrastructure Plan. This will assist with delivering state and/or regional facilities and generate benefits from economies of scale.</p> <p>There are significant opportunities for rationalisation of infrastructure and long-term planning that isn't defined by municipal boundaries.</p> <p>Any infrastructure plan needs to include detailed mapping of infrastructure across government, private business, and community groups. There is an opportunity to widen the scope to include services in addition to infrastructure.</p> <p>Infrastructure to support re-manufacture, re-purpose, design for re-use, and recycling are preferable to any infrastructure that focusses on end of pipe treatment of waste (such as incineration).</p> <p>Regional facilities are required right now to recover and treat waste items such as organics, construction and demolition waste, and commercial and industrial waste. Investment by the State in this field is welcomed.</p>
<p><b>5. Support Resource Recovery Across Industry</b></p> <p>Develop capacity across Government to support business development in the waste and recycling industry.</p> <p>Establish a loan scheme for businesses and local government that helps grow locally based and innovative recycling and processing facilities which increase recycling rates while also delivering new jobs across Tasmania.</p>	<p>Local Government has received feedback from industry regarding a need for access to capital to realise projects and to enable business creation. As such Local Government is supportive of actions, such as loan schemes, and business development.</p> <p>While the actions contained in this section are supported, it remains unclear how they will be resourced, both in terms of finance required, and staffing.</p>



<p>Support industry to use materials effectively, reuse materials and to understand the business case to improve resource recovery.</p> <p>Develop an Organic Waste and Resource Recovery Strategy by the end of 2020.</p> <p>Develop a Tasmanian Market Development Study by the end of 2021.</p> <p>Continue to investigate and provide appropriate support for Energy from Waste and Bioenergy options, which includes the management and utilisation of forest residues.</p> <p>Support the investment in industrial waste sorting – in particular construction and demolition waste.</p> <p>Boost demand for recycled products through adoption of sustainable procurement practices across State and local government.</p>	
<p><b>6. Education and Community Engagement</b></p> <p>Provide support to Local Government and the regional waste groups to continue their targeted education and grant programs for schools, businesses, householders and other stakeholders such as charitable recycling organisations.</p>	<p>There is no indication of the level or type of ‘support’ to be provided, and for a plan that is tackling waste, the focus on education and engagement here is extremely small.</p> <p>Education and engagement are vital to the success of programs in this field, and by presenting one paragraph it appears to be significantly undersold, and the one action within the plan is quite vague.</p> <p>Local Government is supportive of broad community engagement to educate about waste minimisation, particularly with a focus on consumption and avoidance of waste, however more details are required on what is envisaged with this action.</p>
<p><b>7. State and National Policy and Regulatory Settings</b></p> <p>Work with Local Government to introduce a statewide waste levy by 2021 to fund waste management and resource recovery activities.</p>	<p>Local Government has been advocating for a waste levy for a number of years and is supportive of this action. In the course of advocating for a levy, Local Government has detailed certain criteria including that any levy be returned to waste management, and not absorbed into State Government general revenue.</p>

<p>Introduce a Container Refund Scheme into Tasmania by the end of 2022</p> <p>Work with the Australian Government to ensure that reviews of relevant legislation, such as the <i>Product Stewardship Act 2011</i>, result in effective programs that enhance resource recovery</p>	<p>There is no detail in regard to the levy charge. Voluntary levies have existed in Tasmania, ranging from \$2 up to \$10 per tonne of waste to landfill.</p> <p>The levy needs to be set at a rate high enough to provide a substantial revenue stream to provide administration and deliver projects. Driving up landfill rates by adding a levy will also reduce the gap between landfill and recycling programs, making recycling options more attractive.</p> <p>Local Government has been advocating for a Container Refund Scheme (CRS) to be introduced in Tasmania. Council officers have consulted with the EPA appointed consultants who developed the model framework for a CRS. A well-managed CRS will reduce the strain on kerbside recycling systems, in particular a large portion of glass (around 40% of the kerbside recycling bin). It will lead to reduced litter as items become more valuable, and it will deliver financial benefits to community groups.</p> <p>Local Government will continue to monitor development of the CRS and its suitability, such as adequate number of drop off points proposed, and impacts on kerbside recycling contracts.</p> <p>Local Government is supportive of the development of further programs under the Product Stewardship Act. Many councils have tapped into national programs in the past such as paint, and ewaste.</p>
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## GAPS IN THE WAP

### Response to emergency situations

From time to time there are unforeseen events that impact the waste industry. Circumstances such as loss of markets, and loss of facilities and infrastructure through natural disasters, can lead to emergency actions being required. Contingencies should be planned for within this plan.

### **Determination of resourcing levels to implement this plan**

To achieve the outcomes contained within the plan, a significant level of resourcing, both in terms of finance, and staffing, needs to be secured. There is no indication of the level of resources required to implement this action plan, or where the funds or staff will come from.

#### *Local Government resource recovery facilities and kerbside collection*

For Local Government, key responsibilities include the collection of waste and recycling from rate payers, whether through kerbside collection or by providing transfer stations and landfills.

All regions have identified a need for the assessment of the operation of transfer stations to best practice. The upgrade of facilities and the transfer station network, in particular smaller sites, is required in order to improve usability and site safety, recover more materials of differing types and improve site management including data collection.

The recent recycling market disruptions and resultant challenges with kerbside recycling are unlikely to abate in the near future. The final WAP needs to recognise and respond to the recent COAG commitment that “Australia should establish a timetable to ban the export of waste plastic, paper, glass and tyres, while building Australia’s capacity to generate high value recycled commodities and associated demand”.

### **Household hazardous waste**

The issues with household hazardous waste have been constantly raised for a number of years by Local Government as a priority action. Household hazardous wastes include items such as old medications, chemicals, paints, and batteries. Several years ago, the State Government funded a 3-year program providing an avenue for the community to dispose of household hazardous wastes in a controlled environment through a series of free drop off days shared amongst regions. This program was very successful but ceased when government funds allocated to the program were exhausted.