

23 February 2023

Tasmanian Waste and Resource Recovery Board

By email: enquiries@wrr.tas.gov.au

Dear Board,

Draft Tasmanian Waste and Resource Recovery Strategy

Thank you for the opportunity to provide a submission on the Draft Tasmanian Waste and Resource Recovery Strategy 2022 – 2025. 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 or via phone on (03) 6246 3740.

Yours sincerely,



Dion Lester
CHIEF EXECUTIVE OFFICER

LGAT Submission: Draft Tasmanian Waste and Resource Recovery Strategy

Local government welcomes the release of the Draft Tasmanian Waste and Resource Recovery Strategy 2022 – 2025 (the Strategy). Our sector has been calling for state leadership and action on waste for several years. And while the State Government released a draft Waste Action Plan (WAP) in 2019 aimed at providing a framework to address waste and resource recovery challenges in Tasmania, the WAP did not progress to a final document or tangible on-ground actions.

The two key actions in the WAP that were implemented (and welcomed by our sector) were the Statewide Waste Levy and commencement on the Container Refund Scheme design. LGAT is supportive of both actions, after lobbying the State for many years for policy action on each of these important actions.

The Strategy provides an important foundation for further action, and we note that it will be supported by an action plan that identifies the responsibilities of all the critical parties. However, given the stalled actions from the WAP, it is important that the Waste and Resource Recovery Board (the Board) move swiftly from planning to action.

Embracing the Circular Economy

The high-level aim of “embracing a circular economy” is supported, as this offers a significant opportunity for our state. 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 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. And while there is a lot already happening in Tasmania around the circular economy much of the work is happening in isolation because there is no central plan or coordinated action.

The Board needs to clearly 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 statements and targets provided in the Strategy.

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, or state.
- The type of benefits that could be realised in Tasmania and the associated adjustment costs (e.g., implications for jobs and economic growth).
- How other jurisdictions with similar structures and challenges to Tasmania have approached the circular economy.

Consideration should be given to the Strategy incorporating principles that set a path to the circular economy, and then the development of a standalone policy statement on the circular economy to signal to industry where Tasmania is heading, and to guide infrastructure and investment planning during the transitional period.

Compliance and Enforcement

The implementation of a waste levy needs to be thoroughly considered, and lessons can be learned from other jurisdictions. 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 (Environmental Protection Agency (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 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 the regulations and gaps that may allow non-compliance activities.

We note that the EPA will receive an annual allocation from levy funds to undertake compliance and enforcement activity for illegal dumping and that the Strategy includes an action to:

Identify the agreed range of services provided by the EPA in addressing littering and rubbish dumping across the State.

Tasmanian councils are co-regulators with the EPA under the *Environmental Management and Pollution Control Act 1994*. LGAT has been working with EPA to design a new our Memorandum of Understanding (MoU) to reflect that councils are partners with EPA for an effective, joined up approach to compliance activities. We understand that the EPA is developing an illegal dumping team, and that this forms part of our draft MoU. We look forward to active engagement with our sector, and local government

participation in program planning of the important compliance education and enforcement activities. In addition to the EPA's work, it is critical that councils are supported (with resources and direct funding) to implement the necessary statewide activities on litter management and illegal dumping.

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 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.

In addition, measuring progress towards the circular economy 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.

Support for 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 Construction and Demolition (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 are high. Tasmania also has a significant opportunity to benefit from greater local recovery and recycling activity.

The Strategy and subsequent action plan 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 Strategy is currently silent on Government procurement targets.

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.

Conclusion

Councils and regional waste authorities are the primary waste managers that provide household waste collection and recycling services, manage 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 to align with the final Strategy and support a move towards becoming a circular economy.