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17 November 2021

Dear Ms Ferres Miles

Re: SV 2030: A decade of action – consultation draft

Thank you for the opportunity to provide feedback on Sustainability Victoria's draft SV 2030 strategy. The Waste Management and Resource Recovery Association of Australia (WMRR) is the peak national body for all stakeholders in Australia's \$15.5 billion waste and resource recovery (WARR) industry. We have more than 2,000 members across the nation, representing the breadth and depth of the sector, spanning business organisations, the three (3) tiers of government, universities, and NGOs.

The sector drives jobs – employing up to 50,000 people – and investment in the Australian economy, and WMRR's purpose is to lead the success of this essential industry while ensuring the environment and community are protected through the safe and responsible management of waste and resources.

In Victoria, the WARR industry remains a key contributor to the state's economy and environment. The value of the sector in 2017-18 was estimated to be about \$3.7 billion¹ while in 2018-19, Victoria's WARR system managed 15.33 million tonnes of material, of which approximately 4.57 million tonnes were sent to landfill and 10.77 million tonnes (70%) were recovered for recycling².

WMRR acknowledges the Victorian government's significant work over the last two (2) years, in an attempt to manage its ongoing WARR challenges and capture opportunities that will future-proof the sector and economy. Despite the flurry of activity, including the development of new environment protection regulations and reference standards that came into effect on 1 July 2021, the release of the waste to energy framework, significant funding committed by government, as well as the introduction of the Circular Economy (*Waste Reduction and Recycling Bill*) into Parliament (which would enable the roll-out of initiatives such as the container deposit scheme), WMRR is growing increasingly concerned that the approaches taken are not well-considered and run a real risk of failing to meet stated policy objectives, given the lack of coherence and industry knowledge that continues to be exhibited.

¹ Inside Waste Industry Report 2019: Volumes and Values

² National Waste Report 2020

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In relation to SV's draft 2030 strategy, WMRR acknowledges the organisation's intent to "deliver a decade of action to 2030" and in theory, supports SV's focus on the three (3) areas identified – investment and innovation, behaviour change and education, and community action. WMRR also notes that SV appears to have a clear understanding of the principles of a circular economy, the linkages between carbon emissions abatement and WARR, and the value in taking a materials management approach towards WARR.

However, it is regrettable that the strategy, as it currently stands, is a high-level document that tends to be repetitive, does not appear to understand circular economy (how to get there; beyond the principles) and the role that SV can play, and provides little, if any, tangible and meaningful actions that will allow SV and the Victorian government to meet its objectives

A missed opportunity

WMRR notes that SV intends to develop an activation plan which outlines the steps it will take towards a "sustainable future" but queries how it can develop such a plan if there are no concrete actions, targets, milestones, roles and responsibilities, etc. articulated and/or assigned in the strategy in the first place. Without these details, WMRR questions how SV can develop a follow-up action plan that provides meaningful and practical pathways in which these actions can and will be implemented, funded, tracked and/or delivered.

It is noted that SV has tried to detail how it will support each focus area, providing information around the activity types, framework/plan, and service offering. However, all of these are lacking the clarity, certainty, and detail required to provide stakeholders with confidence that SV understands its role, responsibilities, and actions required to meet its remit. As this may be explained by the current lack of certainty as to the future resources and responsibilities that SV will have once the proposed Waste Authority is developed and implemented in 2022, one wonders if this is reason enough to hold off on dedicating resources to SV's plan until such issues are clarified (more below).

As highlighted above, the Victorian government has been active in the WARR sector and today, has a number of policies, priorities and plans, which SV has included on page 10 of its strategy. It is unfortunate that SV has missed an opportunity to clearly articulate how it will intertwine its activities and initiatives with these strategies/policies – including, Recycling Victoria, the EP Act reform, recycling infrastructure plan, and more, as well as, importantly, other government departments. It is submitted that the graphic on page 10 that claims which policies SV's focus areas are aligned with is insufficient in the absence of specifics around how and where the alignments are. Further, the graphic on page 12 that stipulates SV's impact areas cannot be understood as there are no details on what the percentages mean, how they have been derived, or how the targets and impacts will be achieved.

Role clarity

This lack of clarity in what SV intends to do and its roles, responsibilities, actions, and timeframes are a possible sign of unnecessary bureaucracy and overregulation of the WARR sector. Victoria's current state government's WARR portfolio agencies, comprising DELWP, the EPA, and SV, represent a significant amount of government oversight and had the ability to provide a strong structure for effectively planning and delivering Victoria's WARR system in conjunction with industry, particularly given government investment in this area. Yet by mid-2022, Victoria will have four (4) bodies. To

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exacerbate the structural confusion, it is not evident how these government bodies will work together, which is apparent in SV's draft strategy, as it is unclear what SV intends to undertake (and how) till 2030 in conjunction with the other organisations in the government's portfolio.

Given that Victoria will soon have four (4) agencies, it is particularly surprising that SV is proposing to explore the development of yet another coordination body [focus area three (3)] to "deliver cohesive integrated government program and policies targeting communities and mid-scale climate action". WMRR does not support this as there is already a well-resourced government agency.

WMRR notes that SV's survey has asked respondents to rank the four (4) resources – materials, water, people, and energy – in order of importance. All four (4) resources are vital to the economic, human and environmental health of the state and as SV is adequately resourced, WMRR queries why activities across these resources cannot be given equal focus and why these actions cannot operate in tandem.

Too many unanswered questions

SV's draft strategy leaves too many questions unanswered and provides little, if any certainty over SV's plan of action and role in the WARR space.

In addition to addressing the issues highlighted throughout this submission, WMRR is also seeking clarity of the following:

- It is acknowledged that SV appears to have a clear understanding of what a circular economy entails, the importance of holistic material management and optimisation, and the gravity of all parts of the supply chain in establishing circularity and providing higher order outcomes in accord with circular economy principles. SV is encouraged to articulate its role and responsibilities, as well as actions, in creating end markets for materials (including how it will get all stakeholders in the supply chain to the table, and not just the end-of-pipe WARR sector), and how it proposes to drive resource optimisation across the supply chain to achieve a circular economy.
- It is unclear how the various state policies, strategies, and organisations, when employed, will assist with meeting Victoria's 2025 and 2030 targets set out in Recycling Victoria and the Climate Change Strategy. On SV's part, WMRR proposes that the organisation develops sector- and material stream-specific plans aligned to the state's targets and against SV's remit, as well as in consideration of a more rapid uptake of recycled content, with clear measures, actions, milestones, and consequences for not meeting these.
- How SV's investment facilitation service will align with the EPA's approval process for beneficial reuse of materials and prioritise those that will have greatest impact.
- How SV intends to enable sustainable and genuine dialogues with the WARR sector to drive success across its focus areas; in particular, genuine innovation (as opposed to simply claiming something is innovative).
- SV's waste project model does consider the expected decrease in residual waste generation from the anticipated rollout of FOGO. WMRR queries how SV presumes to be able to understand the necessary waste infrastructure capacity required in Victoria as it develops the



Victorian Recycling Infrastructure Plan, and subsequently, its investment and grant funding decisions, if these are based on an outdated model.

It is vitally important that SV continues to engage with the WARR sector as it finalises its strategy and activation plan. Please do not hesitate to contact the undersigned if you would like to further discuss WMRR's submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia