



Mr Jason Jacobi
Secretary
Department of Natural Resources and Environment Tasmania
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Submission via email: Waste.Initiatives@nre.tas.gov.au

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Dear Mr Jacobi

Re: Feedback on Draft Waste and Resource Recovery Strategy

Thank you for the opportunity to provide written feedback to the Waste and Resource Recovery Board (WRR Board) on the draft *Tasmanian Waste and Resource Recovery Strategy 2026–2031* (“Draft Strategy”) and for the continued engagement with the waste and resource recovery (WARR) sector over the previous year, including the workshop held at the *WMRR Tasmanian WARR Forum* in May 2026 leading into this consultation period.

The Waste Management and Resource Recovery Association of Australia (WMRR) represents more than 2,300 members from approximately 400 entities spanning the breadth and depth of the WARR sector including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs) and research bodies. Our members operate across the full waste and resource recovery (WARR) value chain, including infrastructure investment and operations, collection and transport, resource recovery, the manufacture of secondary raw materials, energy recovery, and community education and engagement. As advocates for the waste and resource management hierarchy—prioritising waste avoidance, reuse, repair, recycling, composting and energy recovery ahead of disposal—WMRR supports the transition to a circular economy in which recovered resources replace virgin materials in both domestic and international markets. We therefore welcome the release of the Draft Strategy and its vision of creating a circular economy in Tasmania where “nothing is wasted”.

In 2024–25, Tasmania generated 1.27 million tonnes of waste, comprising material disposed to landfill and waste received at resource recovery facilities. Of this, 757,119 tonnes were recovered, resulting in a nominal resource recovery rate of 60%. From the outset, the Draft Strategy identifies that data capture about waste generation, fates and flows within the state is limited, with “mixed waste”¹ being measured rather than specific streams and materials, resulting in misalignment with national waste data. Moreover, as an island economy with a small but stable population, opportunities to access processing technologies may be constrained by both limited throughput volumes and local end-markets for recovered product offtake undermining commercial viability, further we recognise that emerging technologies for recovery and remanufacturing may also be centralised in a

¹ As a side note, WMRR does not understand how this could occur, given the levy reporting requirements, and would request that Tasmania act to address this incorrect recording as a matter of priority given the adverse impact this has on data gathering, levy recovery and future planning.

small number of specific mainland locations— such as plastics processing, battery recovery and textiles recovery, making them challenging to access. Solutions for construction and demolition (C&D) waste are also challenging despite the recoverability and usability of materials such as recycled concrete aggregate, bricks and asphalt, with the lack of regional accessible facilities resulting in a very low recovery rate of 25% (against a national average of 84%), suggesting that mixed material construction loads are being sent directly to landfill.

WMRR's Tasmanian Branch has recognised these challenges throughout our discussions and engagement with the Tasmanian government, identifying the development of an infrastructure strategy, and the management of batteries, plastics and glass as priority materials as areas for reform. Key to discussions is the recognition that as an island economy, strategic planning is needed at a statewide level to develop 'hubs' that enable localised processing and aggregation points with access to appropriate feedstocks and end-markets. The opportunities for increased organics recovery have also been identified, with work progressing already on regional organics strategies to feed into a statewide approach, and WMRR advocating for national consistency across safe and appropriate contaminant levels, testing methods, and upstream management of emerging contaminants such as PFAS, to enable quality feedstocks that can be safely applied to land for beneficial reuse.

The Draft Strategy

WMRR is pleased to see that the Draft Strategy progresses the existing strategy from establishing the landfill levy system to a more delivery-focused agenda that moves Tasmania from a waste management approach to a circular economy approach. Built on circular economy principles with the three (3) pillars of 'Integrated Planning and Action', 'Strategic Investment', and 'Leadership and Engagement' (improving coordination and driving behaviour change), and 'enabled' by data, innovation and communication, the Draft Strategy identifies seven (7) priority materials – organics, C&D, commercial and industrial (C&I) waste, plastics, batteries, e-waste and textiles – and a suite of 24 actions to guide landfill levy investment over the next five (5) years.

Tasmania continues to be behind the national resource recovery average across all major waste streams – constrained by dispersed populations, limited economies of scale, insufficient regional infrastructure and limited waste data, however it is correct to say that there have been significant gains made since the introduction of the landfill levy. Consequently, the Draft Strategy proposes provisional recovery targets for Mixed Solid Waste (MSW), C&D and C&I waste that are below the 80% recovery set by the *National Waste Policy Action Plan*:

- 65% recovery of MSW (against 48% recovery baseline)
- 45% recovery of C&D waste (against a 25% baseline)
- 55% recovery of C&I waste (against a 48% baseline)

The provisional targets also include a 50% reduction in organics sent to landfills and 10% reduction in waste generation per person, aligning with national targets. Despite being identified as priority materials, there are no set recovery targets for e-waste, batteries, textiles or plastics, with actions for repair and reuse, product stewardship, and the phase out of single-use plastics by 2028, predominantly being the approach to addressing these materials.

Given the unreliability of the baseline data available, and in keeping with the Draft Strategy's foundation of moving to a circular economy 'enabled' by data and communication, the provisional targets will be reviewed annually in the WRR Board Reports and, where appropriate, increased, as data quality improves. A formal review is also proposed for mid-2029 to assess whether the priority materials and streams, provisional targets and key programs remain appropriate. This review mechanism suggests that the provisional targets will be adjusted as the strategy progresses.

Ahead of addressing the [consultation questions](#), WMRR emphasises that the Draft Strategy is well structured document cognisant of consultation feedback to date and rationalised against the best available data. The actions seek to embed significant reforms across the Tasmanian economy to shift focus away from solely "landfill diversion" and positioning the transition to a circular economy as a key driver of broader government priorities, including emissions reduction, cost-of-living relief, sovereign capability, and stronger regional economies. WMRR supports this shift as a positive step change, noting the Draft Strategy's emphasis on government led actions that embed:

- *Improving the accuracy and consistency of data, and consequent data-driven decision making.* This is underscored by the *Statewide Waste Data Strategy* that sets nationally consistent definitions, reporting requirements and data systems for all regions, operators and funded programs and a cloud-based Waste Data Hub to provide 'transparent public reporting' with near real-time waste tracking to enable meaningful material flow analysis (Action 1.1). This is a significant reform that will enable investment certainty for innovations and infrastructure and supports the National Environment Ministers' [commitment](#) to establish nationally consistent waste and resource recovery data under the National Competition Policy arrangements to help reduce barriers to business and boost productivity. It should also promote community confidence in recovery efforts and consequently help drive behaviour change.
- *Strategic infrastructure planning*, underpinned by the development of a *Statewide Roadmap* (Action 1.4) identifying infrastructure gaps, required facilities, priority investments and regional service needs, implementation of a *Statewide Organics Action Plan* (Action 2.5) and *Statewide Landfill Strategy* (Action 1.8) and a formal *Statewide Investment Plan* to prioritise levy spending and guide future funding decisions (Action 2.1). Tasmania's stable population and island geography make it particularly suited to regional processing and local value adding, enabling the economy to reduce dependence on imports, strengthen regional economies and improve industrial resilience.
- *Repair and reuse before recycling*, including repair and reuse sector funding with dedicated strategies and programs for repair businesses, reuse enterprises, social enterprises and community-led circular economy projects (Actions 2.2, 2.3, 3.5 and 3.8) and co-design of regulatory and policy approaches to remove barriers (Action 1.6). This is a particularly important to compliment efforts to phase out single-use plastics and for improving the circularity of textiles and electronics. WMRR notes that the development of a *Repair and Reuse Strategy and Action Plan* (Action 2.2) seemingly is the first action to be delivered under the Draft Strategy, with a delivery timeline of 2026-2027.

- *Market development for recovered materials*, including a *Market Development Plan* (Action 2.4) to support new markets for recovered materials and stimulate private investment, co-designing regulatory and policy reforms to remove barriers to markets (Action 1.6), phasing out single-use plastics by 2028 (Action 1.7), and developing guidance for government circular procurement as a market driver by including minimum recycled content, preference for reuse/repair, and end-of-life considerations (Action 3.6).
- *Product stewardship and regulatory reform*, by advising government on solutions for batteries, e-waste, soft plastic and textiles (Action 1.5) and advocating national harmonisation (Action 3.2). WMRR emphasises that international experience, including Scotland's *Circular Economy Act* and the European Union's *Waste Framework Directive*, demonstrates that circular economy outcomes are driven by robust regulatory frameworks and economic incentives—not voluntary measures alone. WMRR has also provided comments on how these actions should go further to deliver meaningful commitment to battery stewardship in particular, noting that significant work to adopt mirror legislation to the *NSW Product Lifecycle Responsibility Act 2025* has already progressed.
- *Circular economy principles across government and industry*, including coordination of cross-government arrangements for circular economy outcomes (Action 3.1) delivering a statewide coordinated education and behaviour change program focused on reducing contamination, improving recycling and supporting reuse and repair (Action 3.4), developing a social impact measurement and certification framework (Action 3.9), using circular procurement and government purchasing to stimulate recycled material markets (Action 3.6), supporting regional innovation, social enterprises and workforce capability programs (Action 2.7), providing funding to grow community-led circular initiatives (Action 3.5), partnership with indigenous communities to co-design circular initiatives (Action 3.9) and aligning with national circular economy reforms while developing Tasmania-specific solutions (Action 3.2).

In WMRR's view, the Draft Strategy has provided a strong framework for progressing Tasmania to achieve its vision of becoming a circular economy "where nothing is wasted". However, in WMRR's opinion revision is needed to:

- include glass as a priority material, and
- align the actions with funding, annual delivery dates and further granularity against priority materials where possible, to ensure that the strategy is actually built on the pillars of 'Integrated Planning and Action', 'Strategic Investment', and 'Leadership and Engagement'. These pillars require ongoing transparency regarding performance data and metrics, clear accountable timebound actions and public access to analysis and planning instruments to encourage investment in circular innovation.

These points have been detailed in our response to the consultation questions.

Responses to the consultation questions

i. *What do you see as the most significant opportunities and challenges to improve waste and resource recovery in Tasmania over the next five (5) years?*

The most significant opportunities are:

- *Developing a statewide WARR Infrastructure Strategy* – this should be inclusive of product stewardship infrastructure such as aggregation points and regional circular hubs to support local participation and product offtake.
- *Establishing standardised data and waste flow analysis* – in order that meaningful progress can be tracked against both Tasmanian and national targets, and evidence-led policy and investment decisions can be made.
- *Stronger procurement and circular supply chain requirements*– starting with recycled content thresholds and preference for reuse/repair and recycled materials in government procurement policies and guidance alongside upstream requirements for manufacturers to phase out problematic materials (ie: plastics) and emerging contaminants.

WMRR believes that these opportunities will drive strategic investment in appropriate, regional infrastructure that moves material up the waste hierarchy.

The biggest challenges remain logistical ones resulting from Tasmania's island economy and small population:

- There are limited quantities of feedstock available, impacting commercial viability of recovery innovations;
- There are limited local markets for the direct offtake of recovered products, and
- There is lack of infrastructure convenience – particularly for C&D recovery where there is limited availability of appropriate technologies on-island (i.e.: crushing), and facilities for the recycling/treatment of textiles, batteries, e-waste and plastics, which are largely based on the mainland.

These challenges could be addressed through funding for targeted innovation hubs and technology procurement to solve specific material challenges that have obvious gaps on-island. This is the strategy taken by Victoria following China's National Sword, where it was very intentional about what recovery infrastructure would be invested in to address particularly plastic polymer processing that was highly reliant on export restrictions, and which was also supported with government procurement under the *Big Build* – creating significant local jobs. This could be a very clear model for Tasmania given the isolations and stadium development.

Does the proposed framework, comprised of the three (3) Pillars, the supporting Enablers, and the circular economy foundation provide a clear and effective structure for advancing waste and resource recovery in Tasmania? If not, what changes or additions would make it more effective?

Yes. WMRR supports this framework noting it facilitates transparency, accountability and evidence-led decision making.

- ii. *Do the proposed priority materials and waste streams reflect the areas where Tasmania should focus its efforts over the next five years? Are there other materials or products that should be considered?*

WMRR is supportive of the seven (7) priority materials and waste streams, and understands the data rationale for their inclusion, however WMRR is concerned that the Draft Strategy is silent on glass. In WMRR's view, the revised strategy should also include glass as a priority material.

WMRR appreciates that the MJA/ Arcadis 2019 data referenced in the background report by NRE on *Priority Materials and Provisional Targets* suggested Tasmania's glass recovery rate was 71%. However, more updated data is required, as WMRR understands anecdotally that thousands of tonnes of recoverable glass continue to be stockpiled and possibly landfilled in Tasmania due to limited local processing capacity, the cost of transport to the mainland and lack of access to offtake markets. This is stark contrast to national [APCO data](#) shows Australia's domestic glass reprocessing capacity now exceeds the volume of glass packaging placed on the market, with 54% of glass packaging manufactured from post-consumer recycled content. This point has been raised in forums with the WRR Board throughout consultation. However, glass is neither identified as a priority material nor specifically recognised as a recoverable material within the C&D waste stream.

Tasmania remains largely reliant on crushing recovered glass for lower-value applications rather than producing high-value recycled glass products. While Tasmania does not have the scale to support bottle-to-bottle manufacturing, there are immediate opportunities to expand "next-step" processing capability, including regional investment in glass crushing technologies to enable recovered glass to be processed for offtake in local civil construction, road base, drainage and asphalt applications rather than landfilled.

Initiatives such as the *Statewide Strategic Infrastructure Roadmap* and *Market Development Plan* are powerful instruments that should be used to support greater glass recovery. Expanding the Container Refund Scheme also provides a significant opportunity to increase the volume of clean, source-separated glass to strengthen the commercial viability of local recovery infrastructure, and support higher-value circular economy outcomes. According to TOMRA Cleanaway, glass currently represents approximately 15% of all containers collected through the scheme. Expanding Tasmania's CDS to include wine and spirit bottles, consistent with schemes already operating in Queensland, Western Australia and the Northern Territory, and from 2027, New South Wales and South Australia, would also best support Australia's efforts to increase recovery of glass and plastic beverage containers, noting the National Environment Minister's [March 2026](#) agreement to progress a national portal for beverage suppliers as a matter of urgency.

- iii. *Do the provisional 2031 resource recovery targets provide an appropriate level of ambition for Tasmania's transition to a more circular and resource efficient economy? If not, how should they be adjusted?*

Yes – Whilst not overly ambitious, WMRR appreciates that the provisional targets are deliberately grounded in Tasmania's current starting point and data quality, and have been benchmarked against the best available baseline data, which indicate significant gaps between Tasmania and other jurisdictions - predominantly due to the levy only being introduced in 2022. WMRR notes a formal review of the provisional targets is earmarked for 2029, however, provisional targets should be adjusted following annual progress reviews as better data becomes available.

iv. Does the draft Action Plan provide the right level of clarity around each action, including the proposed delivery timeframe, the nominated lead agency, and the identified delivery and supporting partners? Are actions sitting under the right Pillar? Please reference the action number in your response if you have any specific comments on an individual action.

No. Whilst WMRR supports the actions in principle, many of the actions have not been drafted in a way that matches the WRR Board's "commitment to clever planning and clear accountability" and should be revised to articulate clear, specific, measurable, and time-bound actions.

Most notably:

- The actions do not assign any funding allocation. WMRR notes that the NRE Report modelled \$50M investment, however the Draft Strategy has not indicated the levy investment expected to meet the deliverables. Action 2.1 for the delivery of an *Investment Plan* should articulate funding opportunities across the strategy timeframe to enable stakeholders to be adequately prepared and not surprised by funding announcements with tight application turnaround times. This is particularly important for local government funding opportunities, which must be cognisant of council budget cycles and lengthy approval processes, and industry stakeholders who often have complex procurement processes for technology and supplies, as well as internal budget approval processes.
- Some actions – particularly those related to data such as Action 1.2 (analyse priority material waste flows) and Action 1.4 (*Strategic Infrastructure Roadmap*) – do not stipulate if these deliverables will become public documents. WMRR would recommend that these are released publicly, noting that such documents will be crucial to informing local government and regional planning and forecasting, as well as providing evidence to support investment in innovation.
- Action 1.6 proposes NRE/WRR Board co-designing policies and potential regulations that remove barriers to recycling and reuse, stimulate circular businesses, improve market development and support resource recovery industries. Whilst this is an important and welcome commitment, it is set with an ongoing timeframe and without specific deliverables, which makes it difficult to measure and hold to account.
- Product stewardship reform is articulated with actions for government advice and policy development for batteries, soft plastics, textiles and e-waste including regulatory, industry-led and incentive-based approaches aligned with national reforms. (Action 1.5). This action has a delivery timeframe of 2026-2028, and there is no explicit reference to introducing mandated stewardship schemes to regulate materials within supply chains. Given the lack of progress by the federal government to move on the review of the *Recycling and Waste Reduction Act 2020*, WMRR would encourage this action to be fleshed out in the final strategy to articulate specific actions and streams, notably:
 - A commitment to adopt framework legislation in 2027 – noting that NSW have implemented the *Product Lifecycle Responsibility Act 2025*, and that discussions are underway with

numerous states (including Tasmania) with NSW to adopt mirror legislation as agreed at the [December 2024 Environment Ministers Meeting](#). It would be prudent for Tasmania to include in its actions a clear delivery pathway towards introducing similar legislation within the short term under which mirror regulations for the management of material streams (with batteries being a priority) can be introduced.

- Batteries regulation to be progressed by the end of 2027 – WMRR understands that ongoing discussions are underway with NSW with a view to adopt the NSW drafting and have the NSW potentially help resource this piece of work. Given the safety issues associated with battery-related fires in WARR facilities and vehicles, this should be urgently prioritised.
 - All actions with words like “improve” and “support” are going to be difficult to monitor and track for accountability and transparency. For these actions, annual progress should provide metrics that can substantiate how this action is being implemented, such as funding investment, participation in schemes and initiatives, or volume throughputs.
 - Some actions have five (5)-year timeframes (such as Actions 3.4, 3.5 and 3.7), which refer to delivering behavior change programs, funding and training support, and community partnerships – all of which are initiatives that require key milestones to be met by community and local government partners. For ease of progress reporting, it would be prudent to separate out actions which use words like “develop and implement” so that these words each accord with a specific year for delivery i.e.: develop in 2028, implement in 2029.
 - Specific action points should be included to specifically drive markets for the priority materials. For example, Action 3.5 can include procurement guidance for all levels of government for recovered organics – in particular FOGO derived composts – to develop secure, circular markets; or set requirements for government policies to require reusable service-ware at events.
- v. *If progress reporting on the Strategy is provided, what information would be most useful for you to see? For example, updates on specific actions, changes in priority material recovery rates, progress against targets, investment outcomes, or other performance measures?*

The WRR Board should publicly report on implementation progress, ensuring stakeholders can assess whether levy funding is being invested effectively and whether policy interventions are delivering measurable improvements. Transparent reporting will also provide industry with the confidence needed to make evidence-based investment decisions in new infrastructure, processing capability and market development. At a minimum, annual reporting should include progress against each strategy action, changes in recovery rates, performance against the strategy's targets, expenditure of levy funds and the outcomes achieved through government investment.

Given the Draft Strategy's vision for Tasmania to be a place where nothing is wasted, the metrics and reporting should capture the *value added* by keeping materials circulating for longer, including:

- Circular economy indices that align with the national *Circular Economy Framework* and to methodologies used by other jurisdictions such as material reuse, material productivity and repair frequency to both measure progress and assist evaluation against national targets; this also supports the pillars of the Draft Strategy for data-based decision making, clear communication and innovation.
- Economic indicators showing the uptake of and demand for recovered materials over virgin counterparts to demonstrate the state's shift towards a more circular economy; for example, tracking the cost impacts of circular procurement, tracking on-island imports and exports.
- Greenhouse gas emissions avoided through diversion and treatment of waste streams - including scope 2 and 3 emissions and avoided carbon through displacement of virgin alternatives (not just avoided landfill) and lifecycle emissions reductions from reuse and extended product life. This may also necessarily capture environmental impacts such as the reduced energy and water consumption per tonne of material processed on island as opposed to imported on-island and manufactured with virgin materials;
- Measures showing households and business attitudes, awareness and behaviours to underscore investment in targeted behaviour change programs;
- Social value indicators such as job creation, social enterprise engagement, and community participation in repair and reuse, recycling, recovery and avoidance efforts; and
- Timely, standardised contamination audits using a consistent, statewide audit methodology to enable tracking against the contamination and recovery targets. WMRR understands this will be rolled out as part of the *Statewide Data Strategy*.

WMRR welcomes the opportunity to further contribute to the development of the final strategy and values ongoing engagement. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely



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