



Mr Alistair Jones
A/ Director General
Department of Water and Environmental Regulation,
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Joondalup WA, 6027

Email: wastestrategyreview@dwer.wa.gov.au

23 August 2024

Dear Mr Jones

Re: Waste Avoidance and Resource Recovery Strategy 2030

Thank you for the opportunity to provide feedback on the Waste Avoidance and Resource Recovery Strategy 2030. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$17 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent in Western Australia, over 180 individual members from more than 35 entities. The state generates 8.05 million tonnes of waste each year with a resource recovery rate of 64% delivering an economic value of \$724 million employing 5,070 West Australians.

WMRR notes this version of the strategy has taken on feedback from the 2023 consultation and we encourage the department to continue to work with industry to understand and capture this feedback further, given that in WMRR's view the draft strategy as it stands, requires greater policy emphasis on creating a resource efficient and productive WA which values materials and resources, reduces reliance on virgin materials, and works to mitigate carbon and create local jobs. Put simply an economy that uses less for longer.

The *National Waste Report 2022* states that WA will need to recover an additional 1,300,000 tonnes to 2030 to meet the national resource recovery target of 80% recovery. At this stage, it is unclear how these resource recovery targets can be met in WA in the absence of a significant shift towards investment in resource recovery infrastructure (including meaningful strategic planning) across all streams, increased emphasis on green procurement by government at all levels, establishing the correct economic settings including levy settings and increased emphasis on market development and demand for secondary raw materials. Not meeting these targets in WA will affect the linked economic (jobs) and environmental (carbon mitigation) benefits, as well as the stated government desire to achieve a circular economy- which requires far greater emphasis on generator responsibility, behavioural change, regulation and further utilisation of economic levers across the entire value chain.

In reviewing the current draft Strategy, we note that the document could benefit from greater clarity, for example the generation targets are listed under Avoid and Protect, and arguably should only sit under Protect. Targets under Avoid should relate to higher order waste management hierarchy activities like making do, borrowing, reusing, repairing etc. WMRR in general supports developing nationally consistent targets and measurements. However, this does not mean that the Federal

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Government must lead this, rather governments should act consistently. Secondly setting specific targets for the use of recovered materials and enhancing transparency in the recycling process can bolster public confidence and participation in recycling programs. Government should lead by example here and set minimum recovered material targets for publicly funded projects in WA.

This strategy also presents a perfect opportunity to kick start a concerted systems change across WA government and all of industry, as there is a real risk that by remaining simply an environment or DWER strategy it can end up disconnected to other sections of the economy. Principle 1 should replace waste with production and consumption. The strategy notes 45% of emissions are associated with products however the focus of the strategy still remains on end-of-pipe activities and not moving further up to address the value chain or design. Principles 2 and 3 should be combined into – waste management is a shared responsibility and essential service. The new Principle 3 should reflect a connected systems approach and accountability. By incorporating 'connected' into the vision the department emphasizes the importance of connected policy (obviously: net zero, WARR, industry, planning and less obvious: Health, Education, Treasury) connecting business models and community to facilitate the movement towards circularity. Principle 4 will then reflect the circular economy principles rather than focusing on end-of-life waste management (we say again waste is not circular). The circular economy and waste management hierarchy diagrams both need to be updated to provide more steps in the value chain, for example design is missing from the WA circular economy- we hope this was not intentional.

WMRR would like to once again reiterate the importance of the landfill levy, an economic tool to reflect the true costs of landfilling (carbon, remediation, gas capture, etc) valuable material that should continue to be circulated. The levy's purpose is also to change disposal behaviour as recycling and recovery become attractive alternatives relative to landfilling. The approach by WA to date of not increasing the levy to reflect the true cost and drive resource recovery, promotes the lowest order of disposal (landfill) as the cheapest option in the waste management hierarchy. This in turn is inhibiting capital investment in recovery infrastructure. Which will in turn continue to see landfill as the cheapest option and prevent WA capitalising on the necessary capital investment and job creation resulting from resource recovery that is necessary to meet its own strategy. The reality is that business as usual is not going to get us where we need to be!

WMRR's responses to the consultation questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

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Submission:

Page/ priority	Comments
Priority 1 Better outcomes for regional and Aboriginal communities	Broadly, the key actions support this priority area. Recycling and landfill diversion activities in regional areas and Aboriginal communities are regularly constrained by transportation challenges. These include, but are not limited to, the cost of transport, availability of servicing from recyclers, condition of roads into remote communities, seasonal variation in road openings, and having adequate storage facilities to safely stockpile streams until such a time that they can be serviced. Regionalisation and consolidation of waste infrastructure is supported, and results in achieving better outcomes which in many instances cannot be achieved at a local level. Backloading is encouraged, however it does not provide a long-term stable solution for the transport of recoverable materials. Consideration should be given to the cost of facilitating long-term transport out of these areas, and the potential benefit of that expenditure towards achieving the waste strategy targets. WMRR also encourages the development of specific guidance for landfill management and operation in regional and Aboriginal communities, tied to educational programs to support improved waste management activities at these facilities. Improved environmental outcomes in these areas where landfill is the primary method for all waste management is often driven by improvements in landfill management, and there is an absence of practical guidance for landfill management in these communities. Extended producer responsibility and product stewardship schemes are discussed in detail below. The Containers for Change program has proven to be a significant incentive for material recovery and an opportunity exists to leverage this and extend collection networks and materials covered. However, many of the programs noted are not specific nor fit-for-purpose to support the waste services in these communities. The recent e-waste to landfill ban is an example of where a bespoke approach has not been considered, resulting in significant confusion for regional operators, and incurring significant transportation fees for local governments. We encourage WA to work collaboratively with communities to develop tailored solutions. Improved and targeted educational and behavioural change programs should also be developed for regional and Aboriginal communities recognizing Culture, Language and long traditions of caring for Country. Queensland and Canada have developed specific First Nations WARR strategies and initiatives.
Priority 2	Waste avoidance is the shortest of the five (5) priorities with key initiatives and activities that will not significantly change the status quo. A system change is needed to move from linear to circular. WMRR advocates for legislative measures and financial incentives to encourage sustainable production and consumption patterns. This would include new and improved existing stewardship schemes, product labels, standards and government procurement to name a few. Along with increasing funding for behaviours change programs and waste prevention activities including infrastructure development.

Increasing our focus on waste avoidance	Government should lead by example and promote the cost saving benefits of avoiding waste throughout the supply chain and product life. By incorporating circular economy principles into existing procurement policies and supporting resultant business models government can lead by example. For example, promoting highest value use for as long as possible through sharing, lending, buying used and refurbishing products. Secondly by setting recycled content minimums or requirements to create demand for these materials and reduce reliance on virgin. This will involve changing mindsets and procedures to support different business models. While WMRR has supported the WA Plan for Plastics Ban in principle, we advocate for broader elimination of single-use items with greater explanation of why. By focusing on a single material type and promoting fibre alternatives WA is reinforcing the values of consumption and a throwaway society, and again not looking to the challenges that exist with some of these alternatives, such as the presence of PFAS. Instead, emphasis should be on avoidance, reuse, redesign and establishing systems that support these behaviours- all of which are about creating less waste and using less for longer. This ties into stronger product stewardship schemes and product design. To create a more resource efficient and productive, less carbon intensive economy, and to shift towards a circular economy we need to start by tackling product design and material use to eliminate waste and pollution at first instance, to enable efficient processing and recycling of materials, as well as the management at end-of-life, including meeting the true costs associated with these. It is often lamented that Australia is a net importer of products with relatively small demand to other nations and lacks the power to influence product design conversations. However, this has not hampered safety standards nor energy and water efficiency labelling. Secondly, we do not have to go it alone and can align with and reap the rewards of European Union requirements. Mandated EPR could spur on long-term complementary manufacturing and design initiatives, for example, the European Ecodesign program, which establishes a framework that sets mandatory ecological requirements for all products sold in the EU. The aim of this initiative is to ensure that manufacturers will, at the design stage, be obliged to reduce energy consumption and other negative environmental impacts of products, while enforcing considerations such as recyclability, polluting emissions, waste, and water use. Reuse and repair also contribute to connecting wellbeing and sustainability. Education and behavioural change programs can shift consumer behaviour to reduce material consumption, enable reuse and repair and utilise current reuse/repair business models or demand their creation. These changes at the community and business level are integral in the transition to a circular economy. Funding to support these activities should not be limited to existing centres and should be expanded to include pathways for agencies, groups and businesses to increase repair and reuse of existing products and designing future ones with this focus.
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Priority 3	The absence of a strong and meaningful WARR infrastructure strategy is felt under this priority. However, WMRR supports the reduction in the number of priority materials. The move to consider environmental risks and potential value alongside tonnes of waste is supported.
Better management of priority materials	Policy goals for food loss and waste reduction must recognize the links among the social, environmental and economic aspects across the food system and must not be viewed as a problem only at end of life. Australia's National Food Waste Baseline Report (against which progress towards national food waste reduction targets is tracked) reveals that by weight, almost as much food is lost in primary production as at the household level: ~2.3 vs. ~2.5 million tonnes. Data from Fight Food Waste CRC similarly indicates that by value, financial losses from food waste are a significant issue across all points of the entire supply chain. WMRR supports the inclusion of the C&I stream and collection for State government agencies and assets however, a systems-level approach towards improving the health and sustainability of food production and consumption needs to be taken. The European Union's Farm to Fork strategy is a pioneering example of a holistic, entire supply chain approach to tackling food waste that could be applied to Australia's Healthy Soils Fund. WA should firstly deploy Wrap UK's Love Food Hate Waste program before working with End Food Waste Australia on broader behavioural and educational campaigns promoting food waste avoidance among businesses and households. The strategy mentions increased recovery of organics however does not recognise demand for the recovered product, nor standards associated with this to maintain confidence and safety. Regulatory frameworks are required to provide clear pathways for reclassifying FOGO and GO-derived materials as a resource permissible for beneficial reuse, such as applying compost to agricultural land. They also protect the environment and community by ensuring that materials are reused safely by, for instance, meeting an agreed standard. Such frameworks are vital for not only making safe products but also serve as the basis for educating households about inputs into kerbside FOGO. WMRR again reiterates strongly that compostable packaging should be out, given the known presence of PFAs and the impact that this can have on both healthy soils and the food that it grows. It is not clear whether paper and cardboard are included in this priority stream. WMRR advocates for inclusion. Action is clearly needed to appropriately manage the recovery gap of 170,000 tonnes in 2021. This was before the introduction of the national export ban for mixed paper and cardboard, which came into effect on 1 July 2024. The strategy should reflect this flexibility and allow for priority materials to change over time. Avoidance is covered in the previous priority. WMRR was expecting plastic recycling and recovery actions in this section considering WA has 270,000 tonnes of plastic to recover to meet the 80% diversion target. Infrastructure developments to support reaching this target do not happen overnight they are faster than behaviour change to avoid generation and should be reflected in the strategy.

		The focus on e-waste and batteries aligns with the e-waste to landfill ban which WMRR supported in principle, on the basis it would be well-thought-out, supported by policy, regulatory, and funding pathways and frameworks ensuring the development and viability of onshore reprocessing, remanufacturing, and end market demand. In the absence of an integrated system with strong product responsibility there is a real concern WA will see increased illegal dumping and/or possibly stockpiling that has a real chance of significant environmental harm. Additional funding is required to support local governments collecting and aggregating e-waste and batteries. Given B-cycle, the national battery product stewardship scheme does not yet deal with batteries embedded in and the national Wired for change, small electronics scheme has not progressed. This funding should be sought from those that generate these materials, hence the need for regulated stewardship. Problematic and legacy waste streams are not mentioned in the report and WMRR is drawing the assumption that existing programs will be unchanged however this does not recognise the continued risks posed by these materials. While priority materials have been drawn from the National Waste Report they do not reflect regional areas. Materials flow analysis is badly needed for the Perth and Peel region and was a deficiency of the State Waste Infrastructure Plan. WMRR also encourages the investigation of regulation requiring government departments and large companies to report their waste management practices therefore promoting public accountability and improvement.
Priority 4	Realising the economic potential of recycling	WMRR suggests rephrasing this priority to reflect far more than just the economic benefits of recycling, there are many benefits to be gained across the entire hierarchy, this should promote activities higher up the waste management hierarchy or promote market demand for recovered materials and the economic impact that this can have. Pulling recycled materials into the circular economy is preferred over proponents continually pushing new products. Two (2) decades of voluntary targets have failed to grow demand for the recycle we produce. We must establish rules that accelerate rather than impede demand for recycled materials and mandate recycled content targets. The previously mentioned avoidance procurement policies should include mandating recovered materials and should support local and state government requirements in contracts to buy back recovered materials produced from their own waste streams. For example, FOGO collection contracts should include buying back compost. This will both ensure demand for the product and encourage quality input materials and reduced contamination. Procurement practices should be a key focus for government to get better alignment with treasury and large government departments. Grant funding and the Recovered Materials Framework should support innovation, market develop and as already mentioned the infrastructure to recover these materials. Bottom ash while a time sensitive priority is not the only material affected by the lack of this framework.

	As stated above, the waste levy moving to an appropriate level is a priority. Expanding to five (5)+years horizon and to a level that incorporates more than simply inflation is required to provide certainty for industry and infrastructure projects. With virtually all the Perth and Peel based councils on waste to energy contracts, residents have insulated themselves from this rise and this will not impact the cost of living. Currently, the majority of residual C&I is being transported out of Perth to landfills in regional WA. Until this becomes uneconomical, recovery of the material will stay low. Funds collected from the levy will also support the activities and programs of the strategy. Policies such as Roads to Reuse and others should employ a risk-based framework for reuse of materials as opposed to highly restrictive product specifications. Environmental protection is a priority, and this can be done with a properly developed risk-based framework. The Recovered Materials Framework is badly needed, and legislation delays until the end of 2027 are hampering industry. Innovations funds to support start-up or expansion are supported but a low landfill levy stymies the development of long-term sustainable recycling businesses.
Priority 5 Contingency planning and climate resilience	WMRR supports improved data and information on options for emergency waste. Further support for collaboration between regulation and local government emergency preparedness is required. Prior to disaster WA should investigate support for WARR facilities and local governments undertaking risk assessment and mitigation as part of emergency preparedness activities to withstand extreme weather events and reduce other hazards posed by emergency events ensuring they remain operational during adverse conditions. In progressing a comprehensive statewide approach, local waste management strategies must be integrated with emergency services and DWER to ensure seamless operation during crises. As COVID-19 has demonstrated the remit of emergency plans must exceed natural disasters and recognise the knock-on effects of small shocks leading to potential large-scale disruption. Developing a consistent framework for WARR management post emergency is paramount before an event to ensure agreement and understanding from all parties. WMRR encourages WA to reach out to Green Industries South Australia who include disaster waste management in their State Emergency Management Plan. WMRR strongly discourages the regulatory approach taken by the Victorian government In addition to the mentioned WALGA Preferred Supplier Panel for Hazardous and Emergency Event Services is important from a state perspective and should be established with consultation from State Emergency Waste Management Working Group with specified deadlines. Finally, WMRR encourages promoting the use of recycled materials in rebuilding efforts after disasters. By encouraging the use of recycled materials in post-disaster reconstruction WA will be supporting both environmental and economic recovery.