

Thank you for the opportunity to comment as part of the DPIE survey for the development of the NSW 20-year Waste and Resource Recovery Strategy.

## **Camden Council**

The Camden Local Government Area (LGA) is located in Sydney's south-western suburbs known as the Macarthur Region, approximately 60km from the Sydney CBD and encompasses a land area of 206km<sup>2</sup> and 94,159 residents (as at 30 June 2018). Camden LGA is bounded by Liverpool City to the north, Wollondilly Shire to south and west and Campbelltown City to the east.

Camden is currently undergoing rapid growth and associated urban development which significantly impacts on the volume and generation of waste and its management.

It is important that NSW 20-year Waste and Resource Recovery Strategy, provides clear direction and realistic goals to guide local governments in their waste management framework and strategy. This is particularly crucial as Camden Council in collaboration with the Macarthur and Liverpool Councils work towards a regional waste contract to commence in 2024, known as 'Project 24', to ensure an efficient and cost-effective waste management systems are provided for current and future communities.

### **1. What are the key issues facing the NSW waste system?**

- Regulatory certainty for the industry regarding the processing and outputs from waste treatments.
- There are very limited large-scale waste facilities and a supporting infrastructure networks to efficiently handle the generated volumes of waste within the Sydney metropolitan area.
- There are no fallback/contingent options if technology or infrastructure fails and to withstand the impact of a volatile international market.
- There is limited secure government financial investment in waste and recycling despite the waste levies hypothecated for this reason.
- There is a need for domestic sustainable end markets for recycled material.
- There is a greater need for market incentives for the use of recycled or environmental benign products.
- There is limited innovation (and support and incentives for innovation) in domestic waste processing and end markets.
- There is a great deal of uncertainty and confusion about waste and recycling amongst the community across all local government areas.

### **2. What are the main barriers to improving the NSW waste system?**

- The level of regulatory uncertainty for the industry regarding processing options and the use of outputs from waste treatments.
- A lack of incentive for innovative waste infrastructure.
- There is no dedicated waste transport infrastructure.
- There is no clear path for the purchase or land and subsequent approval of new waste infrastructure.
- Poor public perception of the waste industry - perpetuates the community's lack of confidence and trust in current waste processing and recycling efforts.
- Financial barriers presented by the cost of processing - it is currently cheaper to landfill and there are limited successful incentives to encourage alternative or innovative options.
- A lack of sustainable domestic commodity markets for recycled products and their use.
- The prescriptive approach to specific technologies such as Food Organics Garden Organics (FOGO) System rather than encouraging more innovative performance-based outcomes

which creates an uncertainty, risk and lack of confidence in the permissibility of new technologies.

- There is no mandatory national labelling scheme for packaging.

### **3. How can we best reduce waste?**

- Ban the use of single-use plastics and implement restrictions on the use of excessive packaging.
- Expand the focus to Product Stewardship ie shift the focus to manufacturing and the higher end of waste management hierarchy rather than just processing end waste. Ensure that Life Cycle Thinking and Circular Economy principles are all incorporated into industry practices
- Support an industrial manufacturing shift to operating in the high end of waste management by focusing on waste avoidance.
- Taxing and other disincentives on the use of non-recyclable or virgin plastics/materials.
- Encourage innovative performance-based outcomes rather than prescriptive technologies.
- Expand the reach of current successful schemes such as the container deposit scheme.
- Ensure recycling options are available for both existing and new technologies ie. solar panels.

### **4. How can we recycle better?**

- Expand the reach of current successful schemes such as the container deposit scheme.
- Focus on the front end of product design and manufacture to ensure they can be readily recycled in standard recycling systems across local government areas.
- Mandate the use of recycled products in manufacturing and packaging to drive market demand.
- Implement a rebate for the use of locally-sourced recycled content.
- Implement a mandatory nationally-adopted labelling scheme – that provides clear, consistent and independently certified labelling to eliminate consumer confusion and ensures packaging is actually recyclable (ISO 14024).
- Align the items accepted in the recycling bin with end markets for recycled products to help reduce contamination levels in the recycling stream, reduce the amount of processing required and increase the value of processing outputs.
- Reduce the confusion about what is and isn't recyclable with a State-wide education campaign.
- Standardisation of accepted recycled materials across all regions at Resource Recovery Centres.
- Improved governance structures such as consistency and management of waste management policies.

### **5. What are the main opportunities for improving the NSW waste system?**

- Increased government support to help rebuild trust amongst the industry to create new opportunities, support innovation and influence regulation allowing for innovation.
- A holistic approach to waste infrastructure:
  - Federal funding and/or guarantees for waste infrastructure;
  - Dedicated zoning specifically for waste infrastructure;
    - Escalate the importance of waste infrastructure in planning instruments;
  - Encourage the building of large-scale facilities;
  - Build networks of facilities along key transport routes.
- Waste levies should be focused on investing in technology and innovation, independent and published research, and infrastructure to help invigorate the development of sustainable domestic markets for recycled material.
- Mandate the use of recycled products in manufacturing and packaging to drive market demand.
- Pursue sustainable procurement policies to ensure strong domestic markets for recycled material.

- Introduce a state standard/specification for acceptable contents across the waste streams coupled with national labelling scheme and an education and awareness campaign.

## 6. Are there any additional views or information you would like to provide about waste in NSW?

- There needs to be a clear position and path for the development of Waste to Energy infrastructure.
- Consider the removal of the levy on problem wastes, such as asbestos, to help prevent dumping.
- Expand the options and opportunities for small to medium businesses – remove the cost of separating waste at the source.
- Integrate sustainability education and training into trades and professions with significant waste management issues, creating less dependence on regulation.
- Shift the focus from the end of life processing/disposal to waste avoidance throughout the product life cycle in the design, purchasing, importing, manufacturing and production phase of manufacturing.
- Encourage and support the repair and repurposing of goods for both community and businesses.
- Support businesses to achieve certification of their Environmental management systems to ISO 14001.
- Increase procurement regulations for Local Government such as:
  - Mandate inclusion of sustainability in tenders to improve market for recycled content and reduce recycled content going to landfill,
  - Encourage sustainability assessments in the evaluation criteria,
  - Consider companies with an environmental management strategy plan or policy or is EMS certified,
  - Consider the full life cycle of products.


Please feel free to contact me should you require further detail regarding any of the points above as part of the response from Camden Council. Thank you.


Regards,

Denise Franovich


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