

M/s Cosgrove,

Director, Policy – 20 Year Waste Strategy

NSW Environment Protection Authority

RE: 20-YEAR WASTE STRATEGY for NEW SOUTH WALES

The Councils of Liverpool, Campbelltown, Camden, Wollondilly and Wingecarribee (The Councils) welcome the opportunity to provide input and feedback on the development of the NSW Government's 20 Year Waste and Resource Recovery Strategy. The Councils are currently working to secure a domestic waste solution for the South West Sydney region from July 2024, when current waste contracts across the region expire. This joint project has aptly been titled 'Project 24'.

The Councils currently service a population of over 580,000 residents and generate in excess of 240,000 tonnes of domestic waste annually. With the rapid growth across the region, this figure is estimated to grow to over half a million tonnes annually by the end of 2044.

With a declining number of landfill options and waste management solutions available to the Sydney metropolitan area, the Councils are looking to secure a solution for the region that will provide a number of key outcomes. This includes a positive environmental outcome, diversion of waste from landfill, security of a processing solution for the next 15-20 years and price certainty. The Councils also hope to attract investment into the waste sector to support the development of technology to deliver these outcomes.

The Councils are encouraged by the focus for a Strategy that supports a self-sustaining waste industry and encourages the reliability of services for our community at a reasonable cost. The Councils have prepared the attached document to convey our comments and feedback in response to the 6 questions put forward. In addition, the Councils would like to have the points below considered as part of our submission.

Key Points to Consider

1. The Strategy should be supported by an appropriate funding package. The funding should focus on supporting major infrastructure projects that deliver on the strategy outcomes rather than smaller *trickle* projects;
2. There is an urgent need for the waste sector to be provided with regulatory certainty over the outputs from waste and/or organics processing pathways;
3. The EPA should be less prescriptive about 'how' outcomes are achieved e.g. FOGO, and provide performance-based outcomes that encourage innovation and investment, and allows the industry increased opportunity to be innovative within the compliance framework;
4. There is little evidence available that the current 2014-21 strategy has achieved its objectives. An evaluation of its impact and effectiveness would benefit the design of the new 20-year strategy;
5. There would be substantial benefits in considering banning organics from landfills. This initiative could be supported through implementation of a tiered landfill levy (Section 88) structure that applies a reduced levy (\$/t) rate to those observing the ban.

Project 24

6. The Strategy should embrace the recommendations from the Federal Governments 2018 inquiry and report into the Waste and recycling industry;
7. Consideration should be given to expanding the product range accepted under the 'Return and Earn' program;
8. Consideration should be given to implementing a State-wide education and awareness campaign on separating resources. This could capitalise on the current consistent household bin identification efforts of councils across NSW and implement:
 - a. a yellow lid anti-contamination (clean-stream) campaign to raise awareness, restore community confidence and reduce the confusion about what is and isn't acceptable in the recycling bin
 - b. a green or lime green lid (clean stream) campaign for the food or FOGO organics stream to ensure residents understand the necessity of recycling organics and the environmental consequences of landfilling this resource;
9. Support councils and NSW Government departments to increasing recycled content in procurement projects, particularly civil works, that could utilize crushed glass fines, recycled organics, plastics and other recyclable materials;
10. Reduce the time taken to release annual WARR data to support local councils and the waste sector in making informed decisions.

We look forward to additional opportunities to provide input to the Strategy and the subsequent release of the final Strategy.

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20-YEAR WASTE STRATEGY for NEW SOUTH WALES

QUESTION	RESPONSE MATRIX						
	REGULATION	POLICY/STRATEGY	OPERATIONAL	FINANCIAL	EDUCATION	INFRASTRUCTURE	STAKEHOLDERS
<p>1. What are the key issues facing the NSW waste system?</p>	<p>1. There is a lack of certainty over the State regulator’s position on MWOO and processed outputs from other resource recovery pathways such as FOGO. This creates enormous uncertainty for the entire industry in relation planning, tendering and investing in projects.</p>	<p>1. There is no evidence available that the current 2014-21 strategy has achieved its objectives. An evaluation of its impact and effectiveness would be beneficial to the new 20-year strategy. A prime example is the provision of resource recovery infrastructure.</p> <p>2. Procurement strategies mandating recycled content have not been implemented by councils and State agencies for the provision of civil works.</p>	<p>1. There is a lack of waste infrastructure to service the Sydney Metropolitan and regional areas now and into the future.</p>	<p>1. It is currently cheaper to landfill residual waste rather than process it. There are no viable incentives to consider alternative or innovative options for residual waste.</p> <p>2. There is a lack of financial investment in waste and recycling despite the waste levies hypothecated for this reason.</p> <p>3. There is a lack of sustainable domestic end markets for recycled material or market incentives for recycled or environmental benign products.</p>	<p>1. There is currently no state-wide standard for acceptable contents within each of the waste streams both residential and commercial waste collection.</p> <p>2. There is currently no consistency across residential bin configurations i.e. red, yellow, green vs red, yellow, green, blue</p> <p>3. There are currently limited state-wide residential and business education and awareness campaigns.</p>	<p>1. There is a significant lack of planning and policy commitment to the provision of resource recovery and waste management infrastructure.</p> <p>2. There is a lack of domestic contingency options. If technology or infrastructure fails or the international market declines, there are no viable domestic alternatives.</p>	<p>1. Delays in the release of data on tonnages, service details and recycling rates from the Annual WARR data reporting by each Council. Release of this data can take up to 4 years. This hinders industry and local government to be able to properly plan ahead.</p>

Project 24

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<p>2. What are the main barriers to improving the NSW waste system?</p>	<p>1. There is a lack of certainty over the State regulator’s position on MWOO and processed outputs from other resource recovery pathways such as FOGO. This creates enormous uncertainty for the entire industry in relation to planning, tendering and investing in projects.</p>	<p>1. There appears to be a strict regulatory approach prescribing specific technologies such as FOGO rather than encouraging more innovative performance-based outcomes. The compliance framework should monitor and regulate process and facility outputs rather than mandating specific technologies. The ‘how’ should be left to the service providers and industry to foster and support innovation in the sector.</p>	<p>1. Australian Standards required to be updated to include the adoption of recycled products like glass fines sand, recycled organics and plastics into product specifications such as civil construction applications.</p> <p>2. There is a lack of local processing/manufacturing options to support domestic markets for recycling outputs.</p>	<p>1. It is currently cheaper to landfill residual material rather than process. This represents a financial barrier. There are very limited viable incentives to consider alternative or innovative options.</p> <p>2. Lack of market incentives for recycled or environmental benign products.</p>	<p>1. There are currently limited standardized state-wide residential and business education and awareness campaigns.</p> <p>2. Loss of public confidence in recycling in the wake of China Sword and subsequent media coverage (e.g. recycling being landfilled, recycling being shipped offshore to illegal operators in South East Asia)</p> <p>3. Confusion caused by differing ‘rules’ (arising from different processing/recycling contracts) in different LGAs, despite standard bin lid colouring. Each facility and subsequent recycling contract allow different materials to be collected across council collection systems.</p>	<p>1. There is a significant lack of planning and policy commitment to the provision of resource recovery and waste management infrastructure.</p> <p>2. There is a lack of dedicated waste transport infrastructure and networks to access regional or alternative facilities.</p> <p>3. There is a lack of community acceptance of new waste facilities being constructed.</p>	<p>1. Poor public perception of the waste industry - perpetuates the community’s lack of confidence and trust in current waste processing and recycling efforts. This also impacts the community’s acceptance of a new facility being proposed or built and creates additional barriers to new infrastructure.</p>

Project 24

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<p>3. How can we best reduce waste?</p>	<p>1. Ban the use of single-use plastics.</p> <p>2. Increase mandatory product stewardship schemes to include other problem wastes such as mattresses and expanded polystyrene. Voluntary schemes have limited success.</p> <p>3. Impose tariffs or other regulatory disincentives to reduce manufacturing or importations of disposable items – both single use items, and items that are made cheaply to serve a short lifespan and then be replaced (e.g. appliances, furniture, clothing that is made cheaply and are cheaper to replace than repair)</p> <p>4. Mandate packaging standards to ensure packaging can only be made from readily recyclable materials.</p>	<p>1. Reduce purchasing (procurement) of non-recyclable materials.</p> <p>2. Mandate state and Local Government Procurement policies include a component of recycled content in key areas to create markets for recycled products.</p>		<p>1. Implement a tax or other disincentive on the use of non-recyclable or virgin plastics and other easily recycled products.</p>	<p>1. Implement a state-wide education and awareness campaign focusing on waste avoidance</p>		

Project 24

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<p>4. How can we recycle better?</p>	<p>1. Expand the reach of the Return and Earn program to include other readily recyclable products.</p> <p>2. Incentivise or increase regulation to make product packaging readily recyclable.</p> <p>3. Expand Extended Producer Responsibility schemes to deal with more products more effectively at their end of life.</p>	<p>1. Procurement policies / strategies including mandated recycled content to be better implemented to drive market demand.</p>	<p>1. Streamline the type and number of items that are accepted in domestic recycling bins so that only items with an end market are recycled (ties in with reducing the types of materials that can be used for packaging, so that packaging is readily recycled).</p>		<p>1. Implement a state-wide standard for acceptable contents within each of the waste streams.</p> <p>2. Implement a state-wide residential and business education and awareness campaign.</p>	<p>1. Standardise recycling collection systems to simplify the system for users.</p>	
<p>5. What are the main opportunities for improving the NSW waste system?</p>	<p>1. Clarify the position on outputs from mixed waste and organics processing pathways to increase innovation in the industry.</p> <p>Bans organics from landfill. This would need to be a phased approach.</p> <ul style="list-style-type: none"> Phase 1 could transition the domestic/residential sector by a set time or ideally upon expiry of current processing and collection contracts. Phase 2 relates to the C&I sector in a further set time. <p>This initiative could be supported by a strategy outlining how this will be achieved and alternative options. Additionally, the implementation of a tiered landfill levy (Section 88) structure that applies a reduced levy (\$/t) rate to those observing the ban could be explored.</p>	<p>1. Be less prescriptive about the pathways to achieve optimal resource recovery and focus on performance-based outcomes leaving the 'how to' to industry to work out the most compliant, innovative and cost-effective solution options.</p>		<p>1. Waste levies could be better used to invest in technology and innovation, research, infrastructure and help invigorate the development of sustainable domestic markets for recycled material.</p> <p>2. Mandate the use of recycled materials whilst implementing a tax/other disincentive on the use of non-recyclable or virgin products, to drive market demand.</p>	<p>1. Introduce a statewide standard for acceptable contents across the waste streams coupled with a mandatory national labelling scheme and education and awareness campaigns.</p>	<p>1. A wholistic approach to waste infrastructure is required:</p> <ul style="list-style-type: none"> Federal funding / guarantees for waste infrastructure. Dedicated zoning specifically for waste infrastructure and facilities. This would help to simplify and stream line the process for new facilities. Encourage the building of large-scale facilities Building networks of facilities along key transport routes and corridors. Coordinate transport hubs and infrastructure to support waste precincts. 	<p>1. Identify a specific government body to be tasked with rebuilding trust amongst the industry to create new opportunities, support innovation and influence regulation allowing for innovation.</p>

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

- Integrate sustainability education into trades and professions with significant waste management issues, creating less dependence on regulation.
- Increased regulatory provisions on design, purchasing, importing, manufacturing and production and waste.

