

23 September 2019

The Hon. Matt Kean MP  
Minister for Energy and Environment  
NSW Government  
GPO Box 5341  
SYDNEY NSW 2001

Email: [20YWS@dpie.sw.gov.au](mailto:20YWS@dpie.sw.gov.au)

Dear Minister Kean,

**RE: 20-Year Waste and Resource Recovery Strategy for NSW**

Thank you for the opportunity to provide a submission to development of the 20-year waste and resource recovery strategy for NSW. AORA works on behalf of its members to raise awareness of the benefits of recycling organic resources. It acts as an advocate for the organics resource recovery and beneficial reuse industries, and represents their views in a constructive dialogue with policy makers.

AORA looks forward to working with the NSW Government to develop a comprehensive 20-year strategy that maximises the recovery and beneficial reuse of our organic resources. A copy of the submission lodged 23 September 2019 is attached.

Regards



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**Director and NSW Chair**  
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## 20-Year Waste Strategy for NSW

23 September 2019

Question	AORA Submission
<p>1. What are the key issues facing the NSW waste system?</p>	<p><b>The creation and enforcement of consistent regulatory standard for organics processing</b></p> <p>NSW has no 'end-of-waste' definitions, criteria for "waste" to be become a "resource" requires legislation to encourage circular economy activity.</p> <p>Resource Recovery Orders (RROs) and Resource Recovery Exemptions (RREs) provide criteria for "waste" to be processed, however, a resource such as "compost" remains a "waste" product despite meeting the processing criteria of the RRO and the land application criteria of the RRE.</p> <p>AORA supports the creation and enforcement of operational and product quality standards for recycled resources.</p>
<p>2. What are the main barriers to improving the NSW waste system?</p>	<p><b>Lack of Cohesion in Strategy and Planning Pathway for Recycling Facilities</b></p> <p>The creation of recycling facilities requires considerable investment prior to commencing. Identification of appropriate sites and surrounding land buffers that protect these assets for the life of the infrastructure is required. Planning pathways for critical waste and recycling infrastructure currently sits with Local and State Government authorities that often have conflicting roles and responsibilities.</p> <p>As per question 1, the creation and enforcement of consistent regulation standards for the NSW Waste system. Regulations that align with the 20 year strategy. At times initiatives such as infrastructure grants via Waste Less Recycle More conflict with existing planning, approvals and waste regulations.</p>
<p>3. How can we best reduce waste?</p>	<p><b>Waste Less Recycle More (WLRM)</b></p> <p>Continued investment in reduction, avoidance &amp; recycling programs such as <i>Waste Less Recycle More</i> and <i>Love Food Hate Waste</i>.</p> <p><b>Waste Levy &amp; Product Stewardship</b></p> <p>Maintaining a State waste levy whilst expanding National Product Steward Ship schemes and regulations. Expansion of the Container Deposit Scheme (CDS) to include a wider range of waste materials that source separation and collection provides a) resource of higher value and b) reduces contamination of mixed streams such as paper, cardboard and organics. By otherwise restricting manufacture and import of products that do not have end-of-life reuse and recycling options (for example biodegradable vs compostable).</p>
<p>4. How can we recycle better?</p>	<p><b>Assist with programs to reduce contamination in municipal and commercial waste derived resources</b></p> <p>Problematic plastics and other potential contaminants need to be removed from the waste stream. Through improved education and product stewardship, contamination can be reduced and clean resources produced.</p> <p>The onus (and cost) to understand the environmental risk and benefit of a input waste such as certified compostable plastics</p>

	<p>should not be on the producer of compost, rather the manufacturer of the material.</p> <p><b>Highest Order of Recovery</b></p> <p>Beneficial reuse of organics to generate compost for soils be prioritised as part of a waste to energy strategy that includes anaerobic digestion and refuse derived fuel.</p>
<p>5. What are the main opportunities for improving the NSW waste system?</p>	<p><b>Resource Recovery</b></p> <p>Waste cannot always be a waste, at some point after beneficial processing it must become a resource.</p> <p>Resource recovery, product stewardship, circular economy &amp; buy recycled initiatives all provide investment and employment in NSW.</p>
<p>6. Are there any additional views or information you would like to provide about waste in NSW?</p>	<p><b>Food Waste Landfill Ban</b></p> <p>Diversion of Food Waste from landfill, providing further opportunities to create renewable energy and “compost for soils”.</p> <p>Increasing diversion of Food Waste from landfill currently relies heavily on implementation of local government kerbside collection programs for Food and Garden Waste (FOGO) to provide tonnage and revenue certainty for processing infrastructure. A ban on landfill disposal of Food Waste generated by the commercial and industrial (C&amp;I) sectors would support local government and industry initiatives to increase investment in infrastructure that supports diversion of source separated Food Waste.</p>