LOCAL GOVERNMENT NSW

# Draft Submission on the 20-year Waste and Resource Recovery Strategy

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## Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

As the provider of waste services and infrastructure, local government plays a critical role in our waste and resource recovery system. This is reflected in waste and resource recovery being an advocacy priority for LGNSW in 2019.

LGNSW supports the development of a 20 year Waste and Resource Recovery Strategy (the Strategy) and welcomes the opportunity to provide our initial feedback through the 20-year Waste and Resource Recovery Strategy survey.

The priority for local government is for the NSW Government to reinvest the waste levy to:

1. Fund regions of councils to develop regional waste plans for the future of waste and resource recovery in their regions, which include infrastructure and circular economy solutions to address the needs of our cities and regions.
2. Fund the delivery of priority infrastructure and other projects, procured by local government, that are needed to deliver the regional-scale plans, particularly where there is market failure identified in the regional plans.
3. Increase local and state government procurement of recycled goods made with domestic content, for example by:
    - adopting recycled content targets to help drive demand and provide incentives to deliver on these targets
    - funding further research, development and delivery of recycling technologies and products generated from recyclables, particularly by local or regional councils.
4. Fund and deliver state-wide education campaigns on the importance of recycling to encourage the right way to recycle, the purchase of products with recycled content, as well as promote waste avoidance.
5. Work with the Australian Government to introduce producer responsibility schemes for soft plastics and other emerging problem wastes.

We look forward to working with member councils to participate in ongoing consultation to take a deeper dive into the issues to be addressed by the strategy.

This submission builds on regular consultation on waste and resource recovery issues with member councils over time and has been developed with direct input from regional waste groups in NSW as the deadline has not given sufficient time to consult with all member councils. It is a draft submission awaiting review by LGNSW's Board, and any amendments will be forwarded in due course.

## Purpose

The Department of Planning, Industry and Environment, including the EPA, is seeking a variety of perspectives from across the sector about the problems facing the NSW waste industry and what options there are to address them via a survey. This is to inform a 20-year Waste and Resource Recovery Strategy being developed for NSW. The survey is the first step in providing written feedback and will also help inform new state-based initiatives, such as the NSW Plastics Plan announced in July.

## Background

The new Strategy will follow on from the current NSW Waste Avoidance and Resource Recovery Strategy 2014-2021 that is providing the framework for waste management to 2021-22, supported by the Waste Less, Recycle More funding initiative.

Since the 2019 election, the appointment of a new Minister and a clear commitment on coordinated waste reforms at the federal level, the NSW Government has amended its timetable for the delivery of a strategy. LGNSW understands that an issues paper about the strategy and potential reform directions is anticipated towards the end of 2019, with a draft strategy to follow. These phases will be accompanied by stakeholder engagement which will inform the final strategy.

The NSW Minister for the Environment has said the focus for the Strategy and accompanying policies is centred on:

- Sustainability – the NSW waste industry is self-sustaining, delivers improved environmental outcomes and avoids the human health impacts associated with poorly managed waste
- Reliability – the bins are always collected, and our waste is managed in accordance with community expectations where our recycling is recycled, for example
- Affordability – waste services are delivered at a reasonable cost and with the customer in mind.

## Survey Question Responses

### What are the key issues facing the NSW waste system?

*Ownership of packaging and product design*

Consumers and councils have been left with the burden of what to do with all the unwanted packaging and products in our households at end of life rather than producers being responsible for better product design and recyclability at start of life as well accountable for end of life disposal, particularly for problem wastes.

LGNSW believes the NSW Government must work with the Federal Government to introduce producer responsibility schemes for soft plastics and other emerging problem wastes.

*Low status of waste and resource recovery in the planning system and as an essential service*

Waste and resource recovery infrastructure and services continues to be given a lower priority than other essential services in the NSW planning system. The outcome has been inadequate planning and protection (including site tenure and encroachment) for this essential service. This systemic issue has contributed to a lack accessibility for waste services and a lack of availability and capacity for processing, with a reliance on offshore waste processing no longer viable.

*Lack of state-wide strategic planning for waste infrastructure*

The current WARR strategy has not taken a long term strategic approach. NSW targets have been set without an infrastructure plan to develop the capacity to recover resources from waste to meet these targets. The *Draft NSW EPA Infrastructure Strategy 2017-21* showed significant infrastructure gaps for household waste streams even to 2021.

Planned population and economic growth for NSW, particularly in metropolitan Sydney, coupled with the federal ban on exporting waste makes the issue of state level infrastructure planning and incentives for delivery of priority infrastructure for reprocessing and remanufacture even more critical.

State level planning that integrates with state and local land use planning regulations, along with the right levers to encourage investment, and even interference in the market to ensure a robust and resilient system is required.

Fundamental to delivering a strategic vision is the need for local government regional waste plans that include infrastructure and circular economy solutions to address local and regional needs. As the sphere of government closest to the community, local government is best placed to procure and coordinate delivery of priority infrastructure and other projects to deliver these plans (particularly where market failure is identified). Funding this regional approach will be critical to the success of the waste and resource recovery system.

LGNSW believes the NSW Government must:

6. Fund the delivery of priority infrastructure and other projects, procured by local government, that are needed to deliver the regional-scale plans, particularly where there is market failure identified in the regional plans.
7. Increase local and state government procurement of recycled goods made with domestic content, for example by:
    - adopting recycled content targets to help drive demand and provide incentives to deliver on these targets
    - funding further research, development and delivery of recycling technologies and products generated from recyclables, particularly by local or regional councils.

*The need to be waste wise and recycle right*

Without state level waste avoidance and recycling campaigns underpinning local level behaviour change initiatives, waste generation rates are not decreasing and recycling contamination is high. The public has a low level of understanding and appreciation of recycling and sustainable consumption. While the 'Love Food, Hate Waste' campaign has helped on food waste, improved focus and campaign outcomes are needed across all material types, particularly 'smart shopping' campaigns for hard to recycle packaging. Confidence in recycling appears to be decreasing, influenced by recent media coverage of exported contaminated recycling and landfilled recycling.

LGNSW Government believes that the NSW Government must fund and deliver state-wide education campaigns on the importance of recycling to encourage the right way to recycle, the purchase of products with recycled content, as well as promote waste avoidance.

*Lack of investment in the sector through hypothecation of the waste levy.*

There has been underinvestment in the NSW waste and resource recovery system as NSW has relied predominantly on overseas processing of recovered materials. This has resulted in an underdeveloped domestic system that has generally not kept pace with best practice technologies.

The NSW government collected $727 million in 2017-18 from industry, businesses and local government through the waste levy, with $300 million of that paid by councils. Currently only about 18 per cent of the levy collected is reinvested into local recycling and waste management with the rest disappearing into consolidated revenue.

The NSW Government has invested in a $465.7 million four-year infrastructure and recycling grants program and other programs under the Waste Less Recycle More initiative. However, residents expect all of the waste levy to be spent for the purpose for which it was collected, and they want the recycling and resource recovery system to work. The waste levy provides the funds for the solution and should be reinvested into a state-wide approach to waste and recycling that creates jobs and develops a circular economy.

*Quality, transparency and accountability of data*

The lack and poor quality of data is inhibiting policy and investment decisions, eg the latest available kerbside data is 2015/16. There is also a lack of central coordination and management of waste sector data for informed decision making. A lack of transparency and accountability of processing costs, commodity prices and end markets for recyclables was experienced by many councils trying to negotiate fair and reasonable Container Deposit Scheme Refund Sharing Agreements and China Sword policy gate fee adjustments to ensure that the community's recycling was managed responsibly and value for money has been obtained.

*Waste policy and targets*

The WARR strategy implementation has not prioritised the waste hierarchy, with little program focus on higher order waste avoidance and reuse.

The current municipal solid waste (MSW) landfill diversion targets are not realistically achievable and are being impacted further by the mixed waste organic outputs (MWOO) regulatory position. New approaches are needed for collection, treatment, recycling and resource recovery (including energy) if even the current targets are to be achieved.

Recycling and recovered resources are viewed as waste within the regulatory system. This negatively influences their value, treatment by the market and their priority within the economy. Whilst it is important to protect human and environmental health, we need to move away from the concept that waste is created once something has been used and remains as such. Strong consideration should be given to changing our view so that material is not waste until it reaches the point where it cannot be economically recycled.

Waste policy has been siloed from other sustainable living and lifestyle policies. A more integrated one stop approach for sustainable living/life style changes for households should be considered, particularly as we move to more compact living without cars in metropolitan areas.

State and local government leadership is needed to drive the procurement of goods with domestic recycled content.

*No domestic pull through for recyclate*

With export markets for unprocessed recyclables closing there is an urgent need to develop onshore markets for processing recycling, and also for creating the demand for domestic recycled content.

State and local government leadership is needed to increase local and state government procurement of recycled goods made with domestic content, for example by:

- adopting recycled content targets to help drive demand and provide incentives to deliver on these targets
- funding further research, development and delivery of recycling technologies and products generated from recyclables, particularly by local or regional councils.

*Lack of competition in the industry*

There is a significant lack of competition within the industry with only two major processors in NSW for materials usually collected for recycling at kerbside (Visy and Polytrade). This impacts prices and creates risks should either company fail.

LGNSW believes that the NSW Government should fund and deliver priority infrastructure and other projects, procured by local government, that are needed to deliver identified priority infrastructure where there is market failure identified in regional waste plans.

*Options for residual waste*

There needs to be clearer policy directions regarding the role of landfill and energy from waste technology for residual waste. The current *Energy from Waste Policy* has not resulted in investment so policy and regulatory settings may need adjusting.

There has been no planning or investment in new landfills for putrescible waste and Sydney's existing putrescible landfill capacity is rapidly running out. Pressure for landfill is increasing, particularly with the MWOO exemption revocation, and transporting waste to regional landfills comes at a high cost and large environmental footprint.

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

*Problems with supply and demand for recycled content*

Contamination of kerbside recycling at householder level caused by the prevalence of hard to recycle packaging/materials and householder malpractice, as well as technological challenges faced removing contamination through sorting, has resulted in poor quality output that is difficult to sell domestically now that overseas markets have closed.

Challenges and costs of recovering organics from metropolitan Sydney households, particularly in medium and high density buildings.

Lack of economies of scale, lack of local processing and high transport costs in regional areas make the cost of recycling higher than landfilling.

Little stable domestic demand for recycled content has meant there is little incentive for investment in innovation and new capital for secondary processing.

Lack of awareness or confidence in recycled materials, lack of research and engineering certification, challenges in guaranteed quality and supply, and lack of domestic markets are all barriers to recycled content use.

Underinvestment by all levels of government to support domestic markets for recycled content.

Failure to fully hypothecate the waste levy to councils and industry to invest in solutions.

*Planning and policy barriers*

Lack of national leadership to:

- regulate / ban /de-incentivise production and importation of hard-to-recycle materials
- introduce producer responsibility schemes with binding targets to drive action by producers to take responsibility for the environmental impacts of their packaging and products.
- standardise packaging labelling and certify use of recycled content

Lack of political will and leadership for infrastructure planning and lack of recognition of the sector's importance as a priority essential service.

Lack of policy and regulatory focus on waste avoidance, reuse, and repair.

Failure to seek input from local councils on waste disposal issues when development is declared 'state significant'. For example, consideration of the impact on local landfill lifespan from disposal of packaging from solar farms, and poor commitment to end of life management of spent solar panels.

Regulatory uncertainty and lack of risk mitigation eg MWOO.

Poor waste data and lack of timely data that inhibits sound policy and investment decisions.

Lack of critical streamlined state level community education for eg waste avoidance and over consumption, recycle right and buy recycled content.

Suggested solutions for addressing these barriers are covered in the opportunities section below.

### How can we best reduce waste?

*Uncouple waste generation from economic growth*

With a growing economy, waste generation in NSW is likely to increase at a faster rate than population growth. There is the potential to aim at uncoupling waste generation from economic growth. As consumers, we tend to view recycling as a panacea that can make any level of consumption sustainable and this is reflected in the current waste strategy for most waste streams. This thinking needs to change.

Uncoupling waste generation from economic growth could be achieved through awareness raising and education campaigns, as well as regulatory or economic policy instruments that avoids the creation of waste and prioritises reuse and repair, particularly as lifestyle models become more compact in metropolitan Sydney.

*Build understanding and change behaviour*

We need coordinated state-wide campaigns supported by local level behaviour change initiatives that build the community's, business and governments' understanding of the system and the impacts of their behaviour on the system. The campaigns also need to promote waste avoidance and over consumerism, how to reuse and repair, provide guidance on how to recycle the right way, and target problematic material items and packaging such as soft plastics, polystyrene and composite materials.

*Reduce consumer packaging waste and hard to recycle packaging and products*

Shift the cost of managing consumer packaging waste at end of life from local government to those who design and generate the packaging through product stewardship schemes for manufacturers, importers and distributors. These schemes should include targets, bans, and design and labelling requirements.

Phase out single-use plastics and problematic and unnecessary materials, including those that are hard to recycle, by providing economic and regulatory incentives to reduce their use.

Minimise the creation of hard to recycle packaging and products through better product design and material selection.

*Encourage materials and products to remain in use for as long as possible*

Maximise product lifespans by capacity building and investing in the expansion of the reuse and repair sector. Address barriers to buying second-hand and repaired products, including right to repair legislation for products that have significant environmental cost to build and discard.

## How can we recycle better?

The NSW community value their kerbside recycling service and want and expect that service to be reliable and responsible, resulting in the recovery of resources.

*Build understanding and change behaviour*

We need state level campaigns supported by local level behaviour change initiatives that build the community's, business and governments' understanding of the system and the impacts of their behaviour on the system. The campaigns also need to promote how to recycle the right way to reduce contamination (including targeting problematic materials in products and packaging) and the importance of purchasing products with recycled content.

*Better source separation and processing*

Review international best practice in household stream separation and explore innovative cost effective recycling methods through pilots at kerbside and take back schemes. For alternatives to be considered they must have improved outcomes compared to the current comingled bin and clean up models.

Explore opportunities to standardise MRF material inputs in the transition to the 2025 National Packaging Targets without restricting the MRFs' abilities to find markets or ways to process difficult recyclable material.

Invest in R&D and technologies and capacity building to support advanced waste and recycling separation at facility level.

Develop secondary reprocessing infrastructure to provide a clean recycled content stream to replace virgin materials.

*Encourage competition and innovation*

Strengthen collaboration for procurement of kerbside services to attract competition and new investment in recycling.

Encourage new entrants and innovative technologies into the market.

*Clearer signals*

Develop a waste and resource recovery industry roadmap to give clear direction and regulatory consistency and certainty for investment, skills and capacity building.

Undertake research and analysis on the types of recycling systems that best meet the NSW Government's 20 year strategic direction.

Improve developer compliance with Waste Not DCP plans, particularly for commercial developments.

Make sure kerbside systems and take back systems work in a complementary way.

*Proactive procurement of recycled content*

Increase local and state level procurement of products with domestic recycled content, for example by:

- Adopting recycling content procurement targets to help drive demand and provide incentives to deliver on these targets
- Funding further research, development and delivery of recycling technologies and products generated from recyclables, particularly by local or regional councils

Improve recycling rates of commercial and industrial and construction and demolition waste through mandated targets of recycled content in new developments.

Consolidate the selling power of MRFs and reprocessers to compete in the global recycled commodity markets, similar to the wool market or other trading co-operatives.

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

*Fit for purpose waste and resource recovery infrastructure*

Fund the development of regional waste plans including infrastructure and circular economy solutions to address the needs of our cities and regions.

Fund delivery of priority infrastructure and other projects procured by local government needed to deliver regional-scale plans, particularly where there is market failure identified in the regional plans.

Identify and safeguard suitable sites to ensure a network of waste and resource recovery infrastructure to meet NSW needs now and for the future.

Prioritise waste and resource recovery within District plans and LEPs and evaluate the benefit of a SEPP for waste and resource recovery infrastructure or similar.

Strategically plan and protect waste and resource recovery infrastructure and coordinate with other jurisdictions for national infrastructure context.

Determine current and forecast future material flows and preferred resource pathways and ensure planning regulations allow for the timely construction and upgrading of processing facilities including EfW and facilities in regional NSW.

Improve waste and resource recovery outcomes for state significant developments, such as wind and solar farms, including through planning approvals and consent conditions.

*Recover household organics*

Organics is the single largest waste stream (45%) in the kerbside residual bin and household organics contribute 34% of food waste nationally.  Its recovery is a key opportunity for improving the waste system.

EPA support for introducing FOGO collections and processing has been taken up by many regional councils but only one council in metropolitan Sydney (but not for multi-unit dwellings (MUDs)) and some councils have conducted trials.

Many metropolitan councils, working hard to meet the NSW Government WARR target for organics, were stimulated by NSW Government infrastructure grants to collaborate with industry to recover organics from their residual bin via alternate waste treatment technologies. This approach was seen to overcome many of the contamination and infrastructure issues that were faced by introducing a FOGO service. However with the revocation of the exemption for land application of MWOO, it is likely that this type of organics recovery will be no longer viable.

With Sydney's future growth expected to be dominated by multi-unit dwellings, a sustainable solution that has regulatory certainty is needed to manage household organics in metropolitan Sydney, particularly from MUDs and mixed use development.

There needs to be a clear strategic policy road map with an evidence-based regulatory framework for household organics recovery (eg FO, FOGO and improved residual organics processing) in metropolitan Sydney.

Innovative incentives, including for front end infrastructure requirements, are needed to encourage transition, along with certainty and stability that the output is a viable and marketable product and that market demand exists.

Regulation, labelling and standards for compostable and biodegradable packaging need to ensure that these can accepted for recycling and kerbside FOGO collections, particularly in light of the national target for all packaging to be reusable, recyclable or compostable by 2025. Compostable and biodegradable packaging should be encouraged in the longer term for all household food packaging where food contamination is an issue.

Currently there is a well functioning collection and processing system for garden organics with ready stable markets that may be compromised if food organics (which have higher contamination rates) are added without behaviour change to reduce contamination.

*Transition towards a circular economy*

The NSW Government has a lead role in developing holistic strategy that supports a transition to a circular economy. Substantial commitment and investment from all levels of government (eg a Premier's Priority) is needed along with a resilient and responsible waste and resource recovery sector.

Regional areas have the potential to develop localised circular economies through regional processing and remanufacturing of recyclables, bringing jobs and investment and overcoming high waste and recycling processing and freight costs facing communities trucking their recycling to Sydney. Support is required to build the market demand for products manufactured with recycled content in regional NSW.

*An effective waste levy*

The waste levy was introduced as a market-based instrument to drive waste avoidance and assist resource recovery to compete against traditional landfill disposal. The levy's objective was to disincentive waste to landfill with levy revenue hypothecated to industry and local councils to assist in education, infrastructure and planning projects to aid the resource recovery industry.

NSW has the highest waste levy in Australia that continues to increase. This is meant to fund a strong and resilient waste and resource recovery system, yet we are not leaders nationally and our system is failing with increasing rates of waste being produced.

Local councils pay the waste levy on behalf of ratepayers. This is recovered through household rates. The levy has limited impact on reducing the waste generated by ratepayers as generally a flat fee is paid. There is no direct financial incentive to reduce, other than a minor reduction in waste charge for a smaller residual bin in some council areas. The domestic waste charge (DWC) is often dwarfed by the property component of the rates notice. There is even less incentive for tenants to reduce waste and recycle with the DWC paid by the owner and rental prices determined by the market.

Considerations for the waste levy review include:

- Structuring the levy to best incentivise higher order resource recovery and reduce environmental impact.
- Incentivising tenants to reduce waste
- Levy liability based on where waste is generated not disposed.
- Use of the levy to stimulate markets for recycled content in products through preferential procurement
- Supporting Strategy objectives
- Advocating that waste levies across Australia are harmonised to minimise interstate transfer of waste.

*Stronger coordination of councils*

The model of the Metro Regional Waste Groups and the RENEW Regional Waste Groups supported by regional waste strategies that align with the NSW WARR strategy has been effective in: improving the delivery of WLRM programs; increasing regional collaboration for planning and joint procurement of waste and resource recovery infrastructure and services, knowledge sharing and capacity building of councils, as well as regional scale campaigns to underpin council level behaviour change across the target areas of the WARR strategy.

A commitment to fund and resource regional coordination for strong waste and resource recovery outcomes for our cities and regions should form part of the Strategy.

*Improve waste and resource recovery data*

Better transparency and access to timely, robust and credible data along with central coordination and management would inform decision making, investment and the achievement of best value for the community, as well as foster trust amongst stakeholders. This is a priority if we are to understand material flows, identify capacity constraints, improve planning, accelerate infrastructure build and proactively develop recycled content demand.

A framework for collecting, analysing and sharing state-wide waste and resource recovery data at LGA level in a timely way is needed including:

- Improved timing of release and quality of the WARR data
- A framework and funding source for consistent, quality compositional audits across NSW to leverage scales of efficiencies
- Technologies for collecting data eg at remote facilities and unmanned landfills
- Systems to track and report that materials are being recycled

The introduction of the container deposit scheme and the China National Sword crisis has reinforced that even though waste and recycling is an essential service there is little competition in the market and transparency and accountability are not a given. Better systems are needed to:

- track and report that materials are being processed and recovered in a safe, healthy manner that meets communities' expectations

- manage commercial sensitivity issues to ensure best value for money is achieved for the community
- enable other price models such as cost/risk sharing to be responsibly considered

*Clearer policy direction, regulatory certainty and consistency*

It is essential the Strategy ensures that the NSW Government provides the framework for the development and maintenance of waste and resource recovery infrastructure to match population growth and transition to a circular economy. Clear policy directions underpinned by regulatory certainty that fosters innovation, investment and employment as well as environmental protection are needed. Recent regulatory uncertainty around MWOO has undermined confidence in the broader organics processing pathways and outputs.

Diversion from landfill and recycling targets should be reconsidered to include waste avoidance and circular economy targets, such as measuring recycling outcomes in remanufacturing, including indirect outcomes such as greenhouse gas emission reduction and energy.

Targets for the Strategy should consider an environmental impact base. For example, soft plastics are an extremely small percentage of the waste stream in weight but have significant impact on land and marine environments. State based targets should be supported by achievable metropolitan and regional targets, for example different organics targets for metropolitan and regional areas, that support investment in areas of most need/impact.

A strong regulatory framework that incentivises correct behaviour and strongly discourages wrong behaviour is essential.

Mechanisms to mitigate/better manage the risks such as commodity price fluctuations in local government disposal and waste processing contracts.

*Support for emerging technologies*

There are opportunities for the NSW Government to provide incentives and mechanisms to encourage the uptake of leading edge technologies and seed fund local innovation to solve some of the system's challenges, particularly with decreasing availability of landfill space in the Sydney region.

*Stable demand for recycled material*

The closure of offshore markets and the ban on export of recyclable waste - paper, glass, plastic and tyres, coupled with increasing waste volumes, requires the development of a stronger domestic reprocessing and remanufacturing sector. Without stable demand there is little incentive for investment in innovation or new capital for reprocessing and remanufacturing.

Governments can use their considerable purchasing power and policy levers to drive demand for local recycled content. This could provide a bulk safety net for recycled content through base products eg recycled crushed glass in roads, as a precaution against demand failure in higher value product markets, eg kitchen benchtops.

Increased procurement by local and state governments of products with domestic recycled content could be achieved by:

- Adopting recycled content targets to help drive demand and provide incentives to deliver on these targets.

- Funding further research, development and delivery of recycling technologies and products generated from recyclables, particularly by local or regional councils.

Regulatory settings and financial incentives can also be used to drive demand for recycled materials in NSW industries such as manufacturing, construction and agriculture.

*Long term strategy for landfills*

A long term strategy for landfill is needed to determine how long this form of disposal will continue as well as the types of wastes that will be accepted/banned at landfills. Leading jurisdictions around the world have aimed at zero waste to landfill in line with the waste hierarchy.

*Increased hypothecation of the waste levy*

The NSW Government collects more than $770 million each year from its waste levy but it only returns a small portion of that money – less than 20 percent - to waste and recycling services in NSW. The remainder funds other NSW Government priorities rather than reserving the revenue for waste management and recycling programs as is its purpose. The more waste is disposed in landfill, the more income the NSW Government receives.

NSW has the highest waste levy in Australia which is meant to fund a strong and resilient waste and resource recovery system, yet we are not leaders nationally and our system is failing. Some of the inadequacies of the levy were documented in the 2012 waste levy review by KPMG.

A growing number of councils have endorsed LGNSW's Save Our Recycling campaign following its launch at the 2018 Annual Conference. The campaign calls on the NSW Government to fully reinvest its increasing waste levy revenue in better planning and management of our waste and recovered resources to drive a circular economy.

*Producers take responsibility*

Producers should be responsible for better product design and recyclability at start of life as well accountable for end of life disposal, particularly for problem wastes. Councils and the waste industry should no longer be left with the end of life management of packaging and products that have built in obsolescence, or are difficult to reuse, repair or recycle.

The NSW Government needs to work with the Australian Government to introduce producer responsibility schemes for soft plastics and other emerging problem wastes.

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

A comprehensive independent evaluation of the WARR Strategy 2014-2021 and the WLRM funding mechanism would inform the design of the Strategy and associated funding mechanism.

Consultation on the Strategy should seek feedback on appropriate funding models for implementation with a focus on projects that deliver strategy outcomes that are identified by councils through regional infrastructure planning.

## Conclusion

The post China National Sword period has been very costly and difficult for councils. However it is acting as a catalyst for strong policy leadership, significant reforms and investment across all tiers of government as well as the private sector and the community to help expedite the transition to a circular economy.

Getting the Strategy right, including an infrastructure plan and implementation of the NSW Government's Circular Economy Policy, is pivotal to the long term success of the waste and resource recovery system in NSW and its role in our transition to the circular economy.

LGNSW looks forward to working with local government, the NSW Government and other stakeholders to make the Strategy a success.

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