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Question 1 - What are the key issues facing the NSW waste system?

There is currently no clear government wide framework for waste management and resource recovery in NSW, leading to a lack of strategic planning towards infrastructure development needs, markets that are dependent on the tenuous global recycling market with no regulatory certainty and ad hoc enforcement practices across multiple authorities. In addition, the focus on government and business procurement of waste disposal and recycling services has been on the cheapest rate possible, with disregard to the environmental externalities and the supply of waste services as an essential service. This has led to unviable pricing structures and vulnerable relationship, which have impeded investment in the development or expansion of services and facilities that would further support the sustainability of the industry and state.

Question 2 - What are the main barriers to improving the NSW waste system?

It is our view, that as well as improved policy and increased funding at a state level, Australia needs a nationally coordinated response from all of Government to improve the NSW waste system and to improve the quality of recycling and secure alternative long-term end-uses for materials. This requires cooperation between industry and all levels of Government, significant funding and a commitment to mandating the procurement of recycled content. There is a need for harmonisation to overview the inconsistencies in waste policies across states and the commonwealth. The adoption of common standards across all Australian jurisdictions would assist in avoiding the unintended consequence of unnecessary waste transport. The inability to access accurate and up to date data is a further barrier to improving the NSW waste system as decisions on future plans and opportunities are not being made with any analysis on how effective existing measures have been, which would enable the prioritisation of future initiatives and more effective assessment on the need for future infrastructure. Waste needs to be considered an essential service. The term 'essential service' is often applied to waste management activities by various stakeholders within all tiers of government and the waste industry however, this title is not legislated in state or federal government policy which causes complications in planning processes and contingency planning. Formally classifying waste as an essential service would help create a platform to bring together planning, logistics, funding and processing requirements for the much needed holistic approach towards waste management. This would need to incorporate land-use planning to ensure appropriate zoning and buffer distances including precinct planning to avoid residential encroachment, which is increasingly becoming an issue for waste and resource recovery facilities. The NSW Government refers to the 20 year strategy as providing a long term vision for waste and resource recovery. However, 20 years may not be long enough to effect the change required. Veolia believes that the development of a circular economy approach is critical in the successful implementation of any future resource recovery strategy. The Vision in the NSW WARR Strategy 2014-2021 refers to '... Using resources efficiently and keeping materials circulating in the productive economy can also help to create jobs and grow the NSW economy.' Circular economy thinking encourages us to view resources differently, ie waste is not a waste but a secondary raw material - it encourages us to view the resource (whether it's waste or energy or water) 'beyond the bin?', 'beyond the light switch' and 'beyond the tap?', to imagine how a material could be used beyond its currently perceived end of life or even better, how a product could be designed to enable its materials to keep looping through the system - a product which positively impacts peoples lives.

The concept of the circular economy is based on the development of regenerative, restorative systems, with the general principles being:

1. Keeping products and materials in use (not just once, but over and over again)
2. Regenerating natural systems
- and, 3. Designing out waste & pollution. All these concepts need to be considered in order to have an effective long term approach to resource recovery and changing the thinking of government, industry and the community takes time.

Question 3 - How can we best reduce waste?

We need to build a sustainable, long-term remanufacturing sector in Australia that has consideration for the long term value of material, thereby supporting a circular economy. This starts with the design and manufacture of products. That is looking at problem wastes and considering how the source material could be designed out or removed from the manufacture process. Extended producer responsibility is an example of an initiative that assists in achieving this by providing incentives to prevent waste at source and promote sustainable product design. A further initiative that assists in reducing waste is the Australian Packaging Covenant which creates a platform for collaboration and shared commitments that consider the whole supply chain. A collaborative approach towards education programs that focus on avoidance, recycling and reuse remains a key factor in driving a reduction in waste generation through community awareness and behavioural change.

Question 4 - How can we recycle better?

Although previous policies have supported the reduction of waste generation and considered the need to improve the circularity of materials through recycling - their main focus has been on the safe disposal of waste materials. Whilst grants have been made available, mandated support for the recycling industry has largely been absent, particularly in the area of procurement of recycled content which would support state and national based markets for recycled materials. We need to develop local markets that create certainty within our own jurisdiction for recyclable material so that we are no longer dependent on international markets through initiatives such as: - Procurement policies that mandate recycled content - Apply the waste hierarchy to guide decision making in waste and resource management - Ensure fit for purpose technology for the relevant waste stream - Encourage source separation to produce the highest value recoverable material - Promote a circular economy approach towards resource recovery - Targeted education campaigns focused on behavioural changes that are linked to separation, contamination reduction and technology drivers.

Question 5 - What are the main opportunities for improving the NSW waste system?

Greater collaboration between government, industry and communities will assist in the effective implementation of the 20 year waste strategy. There needs to be a clear government policy on waste management priorities, which incorporates long-term infrastructure planning. Key deliverables in the strategy need to address the issues and barriers already outlined in this response including regulatory certainty that supports rather than inhibits investment in processing technology. For example, the recent MWOO issue has highlighted the fragility of the resource recovery exemption process and raised questions for the broader industry when considering the viability of new developments which require long term market certainty. Further to this, there is an opportunity to create a more effective regulatory enforcement system for all industry regardless of scale, ie no threshold on waste facilities to ensure that all facilities are captured in any enforcement campaigns.

Question 6 - Any other information that you would like to contribute to the waste strategy initiative?

Incorporate previous feedback provided through workshops, discussions and information sessions already undertaken into the strategy.