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To whom it may concern

### **Tasmania's Draft Climate Change Action Plan 2023–25**

On behalf of the Australian Council of Recycling (ACOR), we strongly support Tasmania's vision of reducing emissions by 2030, through goals such as reducing the volume of organic waste going to landfill by 50 per cent.

ACOR is the peak industry body for the resource recovery, recycling, and remanufacturing sector in Australia. Our membership is represented across the recycling value chain, and includes leading organisations in e-waste and battery recycling, CDS operations, kerbside recycling, recovered textiles, metal, glass, plastics and paper reprocessing and remanufacturing, road recycling and construction and demolition recovery. Our mission is to lead the transition to a circular economy through the resource recovery, remanufacturing and recycling supply chain.

Recycling should be an important plank in Tasmania's climate change plan; and is essentially comprised of three key elements: collection, processing and end markets. If any one element is missing, recycling cannot occur. Recycling also needs to occur at a scale to match the volume of material brought to market.

Outlined below are the four main priorities for a thriving recycling industry.

#### **Strong end markets for recycled materials**

Recycling cannot function without robust markets for recycled materials. There are often significant barriers to market uptake of recycled material, including cost competitiveness with virgin materials and willingness within the supply chain to embrace change.

Procurement of recycled materials must be significantly scaled up to properly kickstart supply chain integration of sustainable recycled products and materials, and establish robust, resilient end markets. Government has a key role to play in leading market demand for recycled content. Measures should be introduced to directly link government funded projects to procurement of recycled materials, to stimulate end markets.

#### **National harmonisation, and alignment between environmental policies and circular economy principles**

An aligned and consistent regulatory environment is essential to delivering recycling outcomes. To this end, policies relating to resource recovery and recycling must be developed transparently and in collaboration with industry and broader stakeholders, supporting robust health and environmental outcomes, social licence, and investment confidence.

One way to properly define, map and support the recycling sector as distinct from waste would be targeted data collection and reporting focussed properly on materials recovery, reprocessing capacities and end markets for recycled materials, underpinned by consistent terms and definitions. The abundant data available in Australia's [National Waste Report](#), for example, doesn't sufficiently discern the various processes that comprise the recycling value chain, in part because of the historical conflation of waste management and recycling.

The right regulatory balance has not yet been struck between mitigating the risks of waste and unleashing the benefits of recovered resources. Another necessary regulatory measure is a nationally consistent definition of 'end of waste'. A circular economy cannot advance if recovered resources are enduringly defined and managed as waste even after being adopted for reuse in other markets: the 'once waste, forever waste' outlook is a relic of a linear economy approach.

Perpetually classifying recovered resources as waste causes an unequal playing field between raw materials and recovered resources, placing regulatory hurdles on recovered materials, such as restrictions on storing materials and on trade and licence arrangements.

To support credible recycling outcomes, we encourage all Australian governments to advance the establishment of ACOR's Australian Recyclers Accreditation Program (ARAP), which will be tailored to Australian recyclers of all types to assess recycling operations on a site-by-site basis.

The ARAP works by establishing an objective and consistent process for assessing a recycling operator's performance and providing assurance around the legitimacy of recycling operations. Accreditation tests whether the operator is secure, sustainable, and resilient. More information on the [ARAP can be found on the ACOR website](#).

### **Producer responsibility for end-of-use**

Product stewardship schemes are an effective way to design out waste, boost recycling rates and fund resource recovery. Spurred by strong consumer interest, there is a growing movement among manufacturers and distributors to take responsibility for their products at end-of-use, with a suite of both mandatory and voluntary product stewardship initiatives rolled out across Australia. However, with the volume of material currently diverted to landfill, a more concerted effort is required to properly deliver a circular economy and maximise recycling.

### **A community that knows how to 'recycle right'**

Community confidence in recycling has been impeded by a lack of awareness of the breadth of genuine and productive recycling activities undertaken in Australia and confusion about what can and can't be recycled, and where. More than ever, the community seeks reassurance that what they are recycling is being recovered and manufactured into new products, rather than being sent to landfill.

[Recycle Mate](#) is Australia's first community-driven recycling app, which is free to download and use. The app combines artificial intelligence with Australia's most comprehensive recycling directory, which allows users to search from over 5,000 items which are linked to provide mapped directions to more than 30,000 geolocated disposal options.

We strongly recommend that the Tasmanian Government supports the uptake of Recycle Mate, which can help reduce contamination in recycling, as well as increase recycling rates through community and EPR recycling schemes.

### **Conclusion**

A thriving recycling sector can help Tasmania lower emissions – through the lower embodied energy of recycled goods — as well as secure supply chains and create jobs.

ACOR strongly welcomes Tasmania's action plan for climate change and would like to play a constructive role in maximising recycling to further these goals. Our members bring considerable real-world resource recovery and recycling expertise through operating in every jurisdiction in Australia and internationally, and we would be very pleased to facilitate further dialogue and consultation.

Yours sincerely



Aziza Kuypers

**Policy and Communications Officer**