

Thanks for giving me the opportunity to provide feedback on the proposed waste ERRP. It is encouraging to see that the plan touches on a comprehensive variety of topics. And I'm particularly buoyed by the regular referral to the development of a circular economy in Tasmania. However, as with the previous ERRP on transport emissions, the plan lacks specificity – it is largely without targets and relies on ambiguous language.

Here are my thoughts:

1 Ambitious Targets and Timeframes:

To demonstrate Tasmania's dedication to waste reduction and recovery, it is imperative that the waste ERRP includes ambitious and specific targets across all areas of the plan. Clear timeframes for achieving these targets will provide a sense of urgency and accountability. By setting high aspirations, Tasmania can actively contribute to global emission reduction efforts and be at the forefront of climate action on waste emissions.

2 Circular Economy and Community Engagement:

The plan's discussion for a Tasmanian circular economy is welcome, and I fully support it. However, I note that the State of Play document includes more detail on the government's commitment at a national level:

"Environment Ministers from all jurisdictions agreeing to work with the private sector to achieve a circular economy by 2030" (State of Play Report, pg. 20)

The proposed waste ERRP contains no details on the 2030 target, or whether the Tasmanian government has committed to this timeline at a state level. Granted, the WRR Board has been set up *"to provide strategic oversight and drive a circular economy agenda"* (State of Play Report, pg. 20), but there was no discussion of timelines for when the government expects us to become a circular economy. A target should be included in the revised plan.

The revised plan should also consider the introduction of legislation like that introduced in France. The Extended Producer Responsibility regime *"is an application of the polluter-pays principle"* (<https://www.roedl.com/insights/france-new-developments-in-the-extended-producer-responsibility-regime>). As the volume of waste from a producer increases, so to does the cost to process it – meaning producers of significant amounts of waste pay more than others that produce less. Similarly, initiatives that encourage product stewardship, where businesses that produce products, like white goods, are responsible for their end-of-life disposal should be introduced.

To successfully move to a circular economy, we need better engagement between all sectors of society - government, industry and community. As quoted above, the Environment Ministers agreed to work with the private sector to help achieve a circular economy, but nothing was stated about the inclusion of the broader community. The community needs to be included in any plan to move to a circular economy.

While it is utterly important to hold businesses to account to drive a cultural shift towards circularity, the wider community can also be a player in driving the move towards a more circular economy. Public awareness campaigns must go beyond education, actively fostering dialogue and co-creation of solutions. This includes inviting the voices of young minds and decision-makers, ensuring they feel valued throughout the process.

3 Food Waste (and organic waste) reduction:

While all organic waste that ends up in landfill needs to be reduced, there should be increased focus on food waste reduction.

It is good to see that there is there is an opportunity to *“support a statewide community awareness program to reduce food waste and divert organic waste from landfill”* (Waste ERRP, pg. 13). And there is support for *“a program to raise awareness in business and industry of ways to reduce waste and divert it from landfill, for example through: ... donation of edible food to food banks”* (Waste ERRP, pg. 13). However, there is no target or commitment to follow through on these initiatives.

Tasmania should follow France’s footsteps and introduce legislation that bans businesses from sending unsold food to landfill. Current industry initiatives, like the Australian Food Pact, are a step in the right direction but there is some indication that they allow good food, which is still edible, to end up being composted instead of used to feed people. And according to the Australia Institute, there is *“unclear how effective the initiative has been”* (Food waste in Australia: and how supermarkets profit from it, The Australia Institute, Sep 2023).

Another initiative that happened in France could also be encouraged here in Tasmania. In the city of Roubaix residents have been participating in zero-waste families. A free initiative, run by the city council, that aimed to get 100 families to halve their annual waste has been running successfully for over nine years. Some 800 families have taken part and 70% of them have managed to reduce their waste by over 50%. This was accomplished by offering participants training and workshops – no direct financial assistance. They’ve also introduced zero-waste teaching in public schools and supports businesses that follow best-practices for waste reduction (The Guardian, ‘It’s kind of gross but we can do it’: How a community learned to go zero waste, 7/Dec/2023).

Additionally, it would be useful for the government to check out some community initiatives like the food pantries run by Grassroots Action Network Tasmania. The wider community has largely been overlooked in this consultation.

Currently, the draft waste ERRP uses terms like *“explore and support”* and *“identify and support”* (Waste ERRP, pg. 13) as part of its future opportunities. This ambiguous language needs to be replaced with far more specific targets.

Additionally, specific funding needs to be set aside to support projects that reduce wastage at every/any level. Focusing on ambitious targets and targeted funding, Tasmania can help curb food waste and promote better resource management.

4 Support for Repair and Reuse

It is disappointing to see that community initiatives like the Eastside Repair Cafe and the Hobart Repair Cafe have not been considered in the proposed plans. Instead, the report claims:

“Limited resource recovery infrastructure in the state may limit the capacity to repair and reuse products and recycle materials.”

While the repair cafes are not industrial in size, they show that there is a community in Tasmania that is interested in keeping organic waste out of landfill through repair and reuse. This community should be encouraged and supported. In France, there are examples of local government converting buildings into zero waste hubs to support groups that are focused on waste reduction.

To complement this, more needs to be done to introduce a *“right to repair”* and end practices like

planned obsolescence.

5 Bioenergy Potential and Limitations:

Biogas is a renewable and clean energy source that can effectively reduce greenhouse gas emissions in the short-term. But its limitations as a long-term initiative must be highlighted in revised ERRP. Australia does not currently produce enough organic waste to meet the demand for biogas production – according to the Climate Council. This will require businesses to shift to other energy resources as organic waste emissions decrease as planned – or encourage increased waste production to maintain supply. There is a concern that biogas could be used as a way of encouraging the use of natural gas as a long-term solution to the climate crisis – we need to ensure that we are moving away from any form of climate warming fuels, and this includes biogas.

As such, I'm worried about the Bioenergy Vision for Tasmania that was developed by the Tasmanian government and the *"alternatives for fossil-fuel boilers, for example in schools, hospitals and correctional facilities, with a focus on bioenergy solutions"* (Waste ERRP, pg. 14). A focus needs to be on electrifying everything, where possible. Bioenergy is a distraction and a short-term solution at best.

6 Mandatory Water-saving Technologies and Retrofitting Programs:

When it comes to emissions reduction in the waste water area, the plan focuses on capturing emissions for energy creation. For example, *"Explore options to support landfill and water treatment plant operators to increase the recovery of energy from organic waste across Tasmania"* (Waste ERRP, pg. 15). There appears to be little discussion of reducing emissions from wastewater by other means. Again, bioenergy should not be considered a long-term solution for waste emissions reduction.

Excessive volumes of water currently processed by wastewater treatment plants contribute to greenhouse gas emissions and energy consumption. To ensure a resilient and sustainable wastewater management system in Tasmania, the waste ERRP should incorporate mandatory water-saving technologies and retrofitting programs. By legislating initiatives that promote rainwater capture and reuse of used water, Tasmania can reduce the water inflow into the sewerage system and subsequently decrease waste-related emissions.

7 Changing Behaviour and Reducing Waste at the Source:

Changing consumer behaviour is crucial in waste reduction efforts. The community needs to be included if they are to change their habits. The previously described zero-waste families initiative is a good example for getting local communities onboard.

Factors such as convenience, cost, education, and incentives play a significant role in waste disposal decisions. Implementation of the proposed container refund scheme (which was not included in either consultation document), covering a wide range of containers and aligning with national standards, can incentivise better waste management.

However, it is equally important to hold producers and retailers to account for the impacts of their products. Circular economy principles should be adopted, and organic waste generated in the agricultural sector should be recovered and reused.

8 Economic Feasibility and Risk Assessment:

The Introduction of the draft plan includes the following:

"In Tasmania, the impacts of climate change will have environmental, economic and social impacts on

our businesses, industries, communities and our natural values. It is important that we adapt effectively to a changing climate and build strong, resilient communities, while continuing to reduce our emissions.” (Waste ERRP, pg. 4)

Climate change is going to have economic impacts. It is necessary to consider that while economic feasibility is important, it should not be used as an excuse to obstruct the actions needed to address emissions. The cost of inaction far outweighs the cost of mitigation, both economically and socially. Therefore, the Waste ERRP should be revised to reconsider the limitation of economic feasibility in the context of the potential risks associated with climate change. A broader statewide risk assessment should be conducted to inform decision-making and prioritise the adoption of bold and necessary actions.