



21 December 2023

Sarah Russell  
Director Climate Change  
Department of State Growth  
10 Murray Street, Hobart, 7000

Dear Sarah

**Re: Public Consultation on Draft Emissions Reduction and Resilience Plan – Waste Industry**

Thank you for the opportunity to provide feedback for the draft Emissions Reduction and Resilience Plan (draft plan) for the Waste Industry on behalf of the Northern Tasmania Waste Management Program (NTWMP).

The NTWMP was formed in 2007 by northern Tasmanian Councils to provide advice, funding and education on better managing waste and recycling from a regional perspective. Current members include: Break O’Day, Dorset, Flinders’, George Town, Launceston, Meander Valley, Northern Midlands and West Tamar Councils. The Program provides support to Councils to ensure best practice in resource separation and waste collection, encourage increased resource recovery, track waste data, and educate residents on recovery contamination. The NTWMP encourages community participation in resource recovery through awards and grants programs.

The NTWMP commends RecFIT for preparing a sector based plan for reduction of greenhouse gas emissions, and in reviewing the draft plan, we submit the following observations.

1. Reducing the amount of organic waste sent to landfill

The NTWMP supports the actions focused on reducing the production of waste, including organic waste, and is actively involved in education and behaviour change programs, presenting a unified voice through the Rethink Waste brand and associated collateral. This service is a collaborative effort between the state’s councils, through the regional waste organisations, and has clear goals to educate Tasmanians to Avoid, Reduce, Reuse, Recycle and to encourage circular economy thinking.

NTWMP support businesses, schools and organisations through regular grant offerings in circular economy initiatives. These cover reducing organics to landfill as well as other waste streams. The NTWMP seeks to collaborate on priorities identified by RecFIT to avoid duplication in delivering the actions as detailed in the draft plan.

## 2. Increasing the recycling and recovery of organic waste

Recovering organic wastes will have a significant impact in reducing future emissions from the industry and the actions of the draft plan align with goals of industry leaders, such as the Waste and Resource Recovery Board (WWRB) and the regional waste organisations. This complementary approach is beneficial for all stakeholders and it is recommended that planning for investment in these initiatives is delivered in partnership to avoid duplication of effort.

The main barrier for organics recovery is the need for increased processing capacity, particularly in the Northern region and the commercial sector. As noted in the draft plan, infrastructure to manage organics is limited and issues such as PFAS and contaminants add significant cost burdens for potential entrants to the market.

The draft plan places the onus for delivering increased organics capacity on Councils, detailing a range of possible strategies including supporting at-home composting solutions as well as kerbside FOGO collections. There are many ways for Councils and industry to manage organic waste, and the region's more remote municipal areas are considering alternative options including incineration and biochar, however, the absence of a clear infrastructure and development strategy, and necessary investment, there are significant barriers for Councils.

Councils and industry are considering how to divert organic materials from commercial and construction industries. Building seconds and demolition wastes, discarded furnishings and other waste streams, include organics, often with some form of contamination, which add to emissions generated in landfill. Development of appropriate sorting and management facilities to increase recovery of materials collected is a high priority for the industry and also requires resources and time to plan and build infrastructure. This is an opportunity which may be worth consideration in the final version of the plan.

## 3. Building the resilience of our waste sector into the future

The opportunities identified in the draft plan around building resilience for climate change in the industry complements the actions for infrastructure planning and goals of the industry to improve product stewardship and design for product longevity and reuse. NTWMP supports the increased interest of governing bodies in advancement of these goals, and supporting

industry adaptation to climate change is welcomed. NTWMP looks forward to the outcomes of research underway and understanding the next steps in this process.

#### 4. Supporting collaboration to reduce emissions and build resilience in the waste sector

Stimulating markets for recycled and recyclable materials has been identified in the NTWMP interim strategic plan and the WRRB strategy. NTWMP, in collaboration with the other regional waste organisations, is likely to develop template procurement policies and procedures for Councils and businesses to embed the use of these materials into purchasing arrangements.

While the plan identifies actions across the whole sector, there would be benefit in clearly identifying the role of the Department to reduce emissions and improve climate change outcomes, and therefore in delivering the identified actions to achieve those outcomes. A clear understanding of the role of the Department and the required investment to deliver this plan would be advantageous in setting expectations between partners involved and achieving demonstrable outcomes.

Should you have any questions or wish to discuss our submission further, please contact our Sustainability Program Manager, Miriam Beswick, on (03) 6333 7777 or by email on [mbeswick@nrmnorth.org.au](mailto:mbeswick@nrmnorth.org.au).

Best Regards,



Jo Fearman  
Chief Executive Officer, NRM North