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Dear Sarah,

# DRAFT EMISSIONS REDUCTION AND RESILIENCE PLAN FOR THE WASTE SECTOR

Thank you for the opportunity to provide feedback on the draft Emissions Reduction and Resilience Plan (ERRP) for the waste sector. There is no doubt that it will be an important guiding document for the sector generally and it is an opportune time to be progressing this Plan given the current level of change and activity in the waste and resource recovery sector.

# State of Play Report

It is pleasing to note that amendments to that document have been made in line with our feedback on that document in July. For completeness, there is a typo in the title of this

organisation in the final paragraph on page 21. The term 'management' needs to be removed from our title.

## **ERRP**

It is noted that the future opportunities identified in the ERRP are high-level and contain passive language such as 'consider', 'explore' and 'identify'. It is presumed that the ERRP will require an action plan being developed to operationalise these future opportunities or at least a mapping exercise being undertaken to identify where these future opportunities are already being progressed by other entities (or will be). In the absence of this approach there is a risk that the ERRP will fail to recognise the opportunities identified to the extent required to achieve change.

A number of the future opportunities identified include the involvement of local government – either directly through being named-up in the opportunity or indirectly. If there is an expectation that local government will be relied upon in the delivery of these opportunities, then it is important that funding and/or resourcing follows where the activities are in addition to current services provided by local government.

Throughout the ERRP, numerous references are made to working with the Tasmanian Waste and Resource Recovery Board. That is an obvious and sensible approach, however for ease of implementation and reference by other organisations, it would be useful to identify within the ERRP which of the Pillars and Actions from the Tasmanian Waste and Resource Recovery Strategy are of benefit to the implementation of the ERRP. This will ensure that actions are codified within one document making clear the actions being pursued.

In relation to the specific priority areas in the ERRP, there are two on which we have comments.

## Priority Area 1

There is an underlying assumption in the first future opportunity identified that increased collection and processing will address the issues around organics. The future opportunity doesn't prioritise processing capacity or market creation for off-take which are both critical to the improved handling of organics.

## Priority Area 3

The resilience of the waste sector is critical to the ongoing provision of services to the community. The future opportunities in this priority area do not contain an action around the identification of critical infrastructure and undertake contingency planning for failure or incapacity of that infrastructure. Given Tasmania's geographical isolation this is vital.

The timing of this work and the Tasmanian Waste and Resource Recovery Strategy presents a unique opportunity for Tasmania to address some of the significant challenges in the waste sector and one that the Southern Tasmanian Regional Waste Authority looks forward to assisting with in its implementation.

Yours sincerely,

Paul Jackson

**Chief Executive Officer** 

**Southern Tasmanian Regional Waste Authority (STRWA)**