



## Response from Circular Economy Huon

### Emissions Reduction and Resilience Plan – Waste, Consultation Draft Renewables, Climate and Future Industries Tasmania

Circular Economy Huon supports taking action on all areas of waste to reduce emissions. As the Draft Strategy outlines, taking action to reduce organic waste is very important. The report provides information about what is happening in Tasmania now and suggests many potential actions for the future. Circular Economy Huon commends Renewables, Climate and Future Industries Tasmania (RECFIT) on the Draft Strategy but has concerns about the governance structure of waste in Tasmania and we suggest there are other aspects of emissions from waste that should be addressed in the document.

#### **1. Harmonising waste plans - too many strategies confuse the actions**

In terms of the government priorities for dealing with waste it is challenging to sort out the intended outcomes of the RECFIT Draft Strategy released in November 2023 and the Tasmanian Waste and Resource Recovery Strategy 2023 – 2026 from the Tasmanian Waste and Resource Recovery Board (TWRRB). In one sense they are both dealing with a similar topic but the Priority Areas in the Draft Strategy differ greatly from the four Pillars and Objectives in the TWRRB strategy.

At a regional level there are three waste bodies that presumably take direction from the TWRRB and they work with 29 individual municipalities who in turn have their separate waste plans. If there is confusion between the actions proposed by RECFIT and TWRRB it will be hard to see them being meaningfully implemented across the state either at a regional or local government level.

#### **2. Ideas rather than achievable actions?**

The Draft Strategy has a set of good ideas but it is totally unclear as to how they will be achieved. The document is written by RECFIT, part of the Department of State Growth but it hasn't the capacity to deliver any of the 'Future opportunities'. Presumably the body that c/would action the report is the Tasmanian Waste and Resource Recovery Board as they are managing the Landfill Levy? If the final version of the document is to have credibility it needs to explain how RECFIT will work with the agency that will action the strategy. What budget will be required on an annual basis to deliver the outcomes? What is the response from the TWRRB to the Draft Strategy?

There are many government plans that have been written for Tasmania by very capable people which have never been implemented. Often this is due to lack of funding. In the case of the RECFIT strategy there is limited chance of implementation as the components and total plan have not been costed at this stage.

### **3. Organic omissions**

The major element of the Draft Strategy is reducing the emissions from organic waste. But organic waste from primary production – horticulture, aquaculture, agriculture and forestry are excluded. If Tasmania is to take a holistic view of dealing with organic waste shouldn't all sources be included in this plan? For example, in the Huon Valley there is both waste from primary production and households so there is scope for looking at a comprehensive strategy to treat all sources of waste. It is likely that taking a comprehensive approach will lead to better economies of scale.

### **4. Targets**

The target mentioned in the report is to reduce the volume of organic waste to landfill by 50% by 2030 but the Organics Report 2022 has a higher target of 75%. It is unclear from the Draft Strategy whether the 2030 target is just for household and municipal organic waste or for organic waste from all sources including organic waste from primary production. It is always good to have a higher target, particularly as the impact of climate change is now so evident.

### **5. Specific responsibilities of the food industry**

It is unclear from the Draft Strategy what responsibilities food retailers, processors and producers will be required to adopt. The document is written in a style that supports good practice but is short on specific requirements and mandates. To meaningfully reduce emissions from organics there will need to be specifications stipulated for all aspects of organic use and production. This is likely to require legislation in Tasmania together with strong representation to federal government.

### **6. The importance of locally grown food and organic emissions**

The longer fresh food is in transit, at point of sale and held prior to consumption the greater the likelihood of the food deteriorating and emitting methane. Therefore, an objective of the Draft Strategy should be to increase local food production either by householders or smaller commercial growers in the region.

### **7. Emissions from transporting organic material**

Carbon dioxide, nitrous oxide etc. are emissions produced from transporting organic material. To reduce these emissions, every effort must be made to ensure that the distances organics are transported are at a minimum. Again this supports local food production and a shift to low carbon transport vans and trucks.

It also means that governments will need to investigate how much food is brought into Tasmania from interstate and overseas. Likewise there are serious questions to be asked about flying fresh cherries, vegetables or cray fish from Tasmania to interstate and international markets.

#### **8. Packaging and emissions**

The Draft Strategy addresses emissions from food organics rather than packaging. But it is more realistic to also include food packaging emissions as a large proportion, if not all food, is packaged in some way. The TEORRA website lists the carbon emissions from cardboard – 0.94kg per kg of packaging; Styrofoam – 1.16kg of carbon; aluminium – 2.32kg and plastic packaging – 3.50kg.

Almost all forms of food packaging enters the waste stream and so far more attention needs to be given to reducing food packaging both for the volume of waste and the emissions. Even packaging that is labelled 'compostable' may only be broken down by receiving special composting treatments that are not available in most regions of Tasmania.

#### **9. Food packaging and price**

Point 8 above highlights the emissions from food packaging. Another disadvantage of packaged food is that it is cheaper than unpackaged foods. For example 1kg of basmati rice from Woolworths in Huonville is \$4.00 whereas 1kg of rice at the local unpacked store is \$9.30.

Unpacked food is invariably more costly than pre-packaged food. Government intervention is needed to encourage bigger retailers to stock more unpackaged food and do so at a price that does not exceed packaged foods. This will reduce packaging emissions and address cost of living pressures by people that want to be more responsible consumers.

#### **10. Other products omitted from the Draft Strategy**

Many products produce emissions and should be included in this Waste Draft Strategy. For example around 90% of children's toys are made of plastic which are made from fossil fuels including oil. They can contain heavy metals and contain hazardous chemicals such as phthalates. Many children's toys break easily, can't be mended, are sent to landfill. There are alternatives, LEGO has products made from sugarcane 'plastics'. Far greater scrutiny is needed on goods allowed to enter the state, so they don't become a source of emissions in Tasmania even when they are discarded.

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