



Mr Kim Evans  
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Department of State Growth  
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6 April 2023

Dear Mr Evans

**Re: Tasmania's Draft Climate Change Action Plan 2023-25**

Thank you for the opportunity to provide feedback on *Tasmania's Draft Climate Change Action Plan 2023-25*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,000 members from over 500 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and NGOs.

WMRR appreciates that an outcome of the *Climate Change (State Action) Act 2008* is this action plan, however we would propose that it is necessary for the plan to consider areas outside of the stipulated emissions focus. In WMRR's opinion the five (5) set sectors, with the focus for WARR being on landfill emissions is too narrow. Focussing on landfill alone does not sufficiently recognise or address the role that the resource recovery activities that our sector undertakes and the creating and using secondary raw materials that the WARR industry produces, plays in the economy and the clear impact that our sector has in carbon mitigation, which goes well beyond simply measuring carbon and methane in landfill.

As noted in the *Circularity Gap Report 2023*, only 8% of the world's materials are circulating, with 70% of global emissions being attributable to material management.<sup>1</sup> Our sector is crucial to keeping resources in circulation. Creating a climate action plan that simply focuses on disposal fails to recognise the important role that WARR plays in climate change. As such we would propose that the scope be broadened to include the broader resource recovery activities that WARR undertakes, as well as the materials that we manage. Specifically higher order waste management hierarchy actions (avoidance, reuse, repair and recycled).

WMRR's responses to the consultation questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

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<sup>1</sup> Circle Economy, 2023, *The Circularity Gap Report 2023*, accessed 28 March 2023, < <https://www.circularity-gap.world/2023>>.

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A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan  
**Chief Executive Officer**  
Waste Management and Resource Recovery Association of Australia

**Submission:**

<p><b>Vision and goals</b></p> <p><b>Do you agree with the proposed vision and goals for the action plan? Which goals are you most supportive of? Are there any other goals that should be considered?</b></p>	<p>WMRR supports the intent of the vision and goals of the plan and proposes incorporating circular economy principles into the plan. Tasmania needs to recognise the role resource recovery, resource efficiency and recycled material plays in reducing emissions, reducing reliance on virgin materials as well as reducing energy demands.</p> <p>A key to reducing emissions is shifting Tasmania from a linear economy, which focuses on end-of-pipe, to a circular economy, where the objectives are to design out waste and pollution, prolong the life of products and materials, and to restore, regenerate and decarbonise. The WARR sector, arguably does the heavy lifting when it comes to creating a circular economy within Tasmania, given how integral we are to the recycling and recirculating of materials within the productive economy.</p> <p>WMRR suggests expanding the goals to include establishing systems that support reuse and redesign behaviours, a reduced reliance on virgin material and the development of government procurement targets for using secondary raw materials and recycled content.</p>
<p><b>Priority areas</b></p> <p><b>2. Will the three priority areas, (1) information and knowledge, (2) transition and innovation and (3) adaptation and resilience, help Tasmania achieve its legislated 2030 emissions reduction target and its vision for action on climate change? Are there other issues not covered by the three priority areas?</b></p>	<p>WMRR broadly agrees that these priority areas will help achieve the currently narrow focus on emissions for the five (5) specific sectors. To reduce all emissions and build climate change resilience WMRR strongly advocates for Tasmania to adopt a systems-based approach to managing materials and incorporate this into the three (3) priority areas. This approach which must be underpinned by the waste management hierarchy, considers carbon mitigation, emphasises product design, extended producer responsibility, and sustainable natural material management, as well as having clear pathways for the use of secondary raw materials in order to keep these in circulation.</p> <p>WMRR also encourages Tasmania to consider total lifecycle assessments when proposing initiatives to ensure that the same level of consideration, requirements, and restrictions on end-of-life material management, currently placed on WARR operators, are placed on those operating at the start of the supply chain. Mandated extended producer responsibility (EPR) schemes are not only logical and have proven globally and locally, that they provide moral, legal, and financial imperatives for product manufacturers to take responsibility for the products they</p>

	<p>create. This policy approach has the potential to drive a paradigm shift in the creation of products at first instance, with greater thought and emphasis given to material selection and product design to minimise the costs associated with total lifecycle management not just end-of-life disposal.</p>
<p><b>Priority 1 Information and knowledge</b></p> <p><b>3. Will the key actions under Priority area 1 help support decision making for you and your community or organisation? What types of projects should be supported under the final action plan?</b></p>	<p>WMRR supports the development of a whole-of-government framework and insists on the inclusion of circular economy and waste management hierarchy principles. The previously mentioned government procurement targets, for all levels, and should be included in the framework.</p> <p>WMRR supports education campaigns for schools and advocated for the recipients to be expanded to include all levels of government and the broader community and the scope to include the circular economy and waste management hierarchy. Tasmania needs to provide the community (and procurement professionals) with the knowledge to exert their consumption power to consume low carbon activities and buy with longevity, repair, reuse, and refurbishment in mind.</p> <p>Education and behavioural change campaigns to-date have struggled to raise the need to consider consumption habits and take responsibility for the waste material we create (whether as an individual, government, company, facility, etc., and think beyond the collection and disposal costs), including where discarded materials and products end up once discarded.</p>
<p><b>Priority 2 Transition and innovation</b></p> <p><b>4. Will the key actions under Priority area 2 support Tasmania to achieve its 2030 emissions reduction target and continued emissions reduction across Tasmania? What types of projects should be supported under the final action plan?</b></p>	<p>WMRR supports Tasmania developing Emissions Reduction and Resilience Plans (ERRP) and encourages all plans to align with the Waste and Resource Recovery Strategy. The government should also explore either broadening the scope of the five (5) sectors or including additional plans. WMRR sincerely hopes that the Waste ERRP goes beyond the single “best fit” opportunity, reducing landfill methane emissions, suggested in the plan.</p> <p>To create a more resource efficient, less carbon intensive economy and to shift towards a circular economy, Tasmania needs to start tackling product design to eliminate waste and pollution at first instance, and to enable efficient processing and recycling of materials, as well as the management at end-of-life, including meeting the costs associated with these. There must be an understanding and an acknowledgement that WARR facilities are recipients of materials, not generators.</p>

	<p>As stated above full lifecycle assessments are needed to ensure that resource recovery capabilities are adequately considered when developing policy. When promoting product upgrades, what happens to the discarded energy inefficient products? System-wide redesign and life cycle thinking are key to ensuring that future products are designed with circularity in mind (disaggregation and reuse of a producer’s own part). Through EPR schemes which hold manufacturers, producers and generators to account Tasmania can proactively avoid future issues similar to the impending solar PV problem- which currently have no recovery pathway.</p>
<p><b>Emission reduction measures – Waste</b></p> <p>We are:</p> <ul style="list-style-type: none"> <li>• Developing a Waste and Resource Recovery Strategy for Tasmania.</li> <li>• Developing a Container Refund Scheme, due to start in 2023.</li> <li>• Delivering a second round of the Business Resource Efficiency Program, following the success of the first round in 2018.</li> <li>• Committed to phasing out single-use plastics in Tasmania by 2025, with funding of \$1 million to help us achieve this target.</li> </ul>	<p>WMRR supports the completed and proposed actions and encourages Tasmania to go beyond viewing the Waste section of the plan as solely end-of-life material management. A systems-based approach ensures that the value of material is understood including the associated positive and negative externalities throughout its lifetime. For example, diverting organic waste from landfill has greater benefits than simply reducing GHG emissions as organic output materials (compost) are a financially valuable resource stream and replace virgin material (another carbon saving). The plan needs to recognise the interconnected and flow on benefits from the WARR sector.</p> <p>The container refund scheme is an EPR scheme that nationally has led to over 70% recovery rate, provides a clean stream of material ideally for remanufacturing of beverage containers in Australia. The market demand for this material and others and secondary raw material in general in Tasmania is lacking and requires government procurement targets, as well as concise nationally developed targets for minimum percentage content of Australian-recycled materials to make recycle competitive with virgin material. The Tasmanian Government must move quickly to establish targets for using secondary raw materials and recycled content.</p> <p>All single-use products that can be readily and economically replaced, should be eliminated not only plastics. Alternatives to single-use plastics tend to reinforce the values of a throwaway society and themselves as products may pose further issues for Tasmania’s resource recovery infrastructure. For example, compostable and organically degradable products may require longer to breakdown than advertised or pose a contamination risk rendering the secondary product (compost) unsafe.</p>

<p><b>Priority 3 Adaptation and resilience</b></p> <p><b>5. Will the key actions under Priority area 3 build resilience and support adaptation planning across Tasmania? What types of projects should be supported under the final action plan?</b></p>	<p>As discussed above, Tasmania needs to move from a linear to circular economy; design out waste and pollution, prolong life of products, grow demand for secondary materials and reduce reliance on virgin.</p>
<p><b>Implementation, reporting, and monitoring and evaluation</b></p> <p><b>6. Are there other ways the government could make its action on climate change, and progress towards meeting its targets, more transparent and accessible?</b></p>	<p>WMRR recognises the reporting requirements under the plans listed on page 29 with a particular focus on the draft Waste Action Plan.</p>