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**From:**  
**Sent:** Monday, 15 January 2024 1:32 PM  
**To:** Climate Change  
**Cc:**  
**Subject:** FW: Emissions Reduction and Resilience Plan - Waste

**Categories:**

Hi,

Thank you for the opportunity to review the State Government's Draft Emissions Reduction and Resilience Plans (waste).

TasWater have committed to making a step-change improvement in our environmental performance to continue to make a positive difference in Tasmania. Through our Environment Strategy and our Climate Change Adaptation Strategy we have outlined a range of bold strategic ambitions which include:

- **Beyond zero carbon** – this will see us focusing on decarbonising our operations, improving energy efficiency, increasing renewable energy production, reducing emissions from our sewage treatment plants and beginning to quantify scope 3 emissions from our value chains.
- **Healthy waterways and oceans** – whilst covering a broad range of initiatives, of particular relevance to the ERRP is an increased focus on improving water recycling which will minimise the volume of nutrient rich water sent to waterways and exploring ways that this valuable resource could be used in agriculture production and sector growth
- **Towards zero waste** – this will see us transitioning to a circular economy and focusing on designing out waste and pollution from our operations and keeping materials at their highest value for as long as possible.
- **Integration of the latest climate science in our operations**
- **Building resilient service to climate change impacts and extreme events** – Infrastructure Australia noted in its Australian Infrastructure (2019) that the potential risk and cost of climate change are greatest in the water sector. As such, it is critical that we continue to work to ensure the essential service we provide to customers and communities across the state are resilient to the effects of climate change whilst also remaining affordable.
- **Providing secure water supplies** – We are focussing on better understanding the reliability of our water supplies to the effects of a changing climate and understanding what interventions are required to ensure continuity of service.

Please find below our responses to the consultation questions – we've split out our comments in relation to the key priority areas:

*Reducing organic waste to landfill*

- Good to see a broad set of current action areas in relation to reducing the amount of organic waste sent to landfill
- One of the barriers to preventing organic waste being diverted to landfill is the contamination of FOGO services. One of the causes of contamination is the variation in what is permitted in the FOGO bins (at home and public) in each local government area. It would be good to see a stronger focus on building consistency across local government areas to make it as easy as possible for consumers to use this infrastructure service as effectively as possible. This will hopefully help to reduce contamination rates and, ultimately, the assist in reducing the total amount of organic waste sent to landfill. This would be a key consideration in the viability of any potential future organic waste recycling/recovery schemes that TasWater may explore if municipal organic waste was an input

- Given the coverage of FOGO services is variable across the state, coupled with a high proportion of regional/rural properties, there may be benefit in supporting communities/individuals to effectively home compost or set up home vermiculture systems.

#### *Increasing the recycling and recovery of organic waste*

- We are pleased to see the focus on data, reporting and analysis in this space which will help businesses develop long-term, responsible commercial decisions/outcomes in this space
- We need to see a stronger emphasis here regarding translation of current/emerging science into policy and/or regulatory action or likely expansion of regulation which may change the commercial landscape in this space. This uncertainty may be a significant barrier for larger operations/players due to the potential commercial risk. Some examples here may include:
  - the impact of PFAS (and other chemicals of emerging concern) on biosolids/compost application to land
  - potential long-term viability of landspreading of waste products which may change supply/demand
  - potential regulation of the organic waste sector likely and if so what would that look like etc.
- We see ourselves as a critical player in this space going forward with significant potential for the recovery of organic waste and production of bioenergy
- The current actions are focused around State Government actions – it would be good to capture what councils/industry are doing in this space.

#### *Building resilience of the water sector into the future*

- It is good to see efforts being put towards fine-scale climate change projections for Tasmania. We are interested to understand further what the statewide climate change risk assessment will include and the expectations of State Government regarding its application and use across varying industries and its integration into planning schemes and other regulatory approaches
- Coverage of resilience in terms of TasWater's scope appears to pick up both the resilience of STPs but also mentions water security. As outlined above, resilience of our operations is a critical focus area for us. We would like to better understand whether the full scope of TasWater's resilience activities i.e. across both its water supply and sewerage services sit under the waste ERRP? While resilience of wastewater management is specifically noted, there doesn't appear to be any of the ERRPs that capture a significant portion of TasWater's climate change and resilience risk related to the provision of a secure and safe water supply – an essential service – and a key gap
- We feel that the resilience scope of the ERRP needs further development – references to resilience appear to be simplistic both in terms of its unpacking of the impacts of climate change on the sector, the potential responses required and what ambition the State Government has in terms of building resilience across the waste sector.

#### *Supporting collaboration to reduce emissions and build resilience*

- It is good to see that the Waste and Resource Recovery Board are starting to play a more prominent role in driving both circular economy initiatives concurrent with emissions reduction targets – we feel the two go hand in hand.
- We are pleased to see that future actions pick up the need to support greater collaboration between industry, academia and government.

We hope this helps and would be very happy to talk through any of our comments/feedback.

Regards,

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