



Mr Craig Limkin  
Renewables, Climate and Future Industries Tasmania  
Department of State Growth  
GPO Box 536  
HOBART TAS 7001

Email: [climatechange@recfit.tas.gov.au](mailto:climatechange@recfit.tas.gov.au)

20 December 2023

Dear Mr Limkin

**Re: Emissions Reduction and Resilience Plan - Waste**

Thank you for the opportunity to provide feedback on the *Emissions Reduction and Resilience Plan - Waste* consultation draft. 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 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. Our members are involved in a range of important waste management and resource recovery activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residual waste.

The WARR sector is intertwined with all other industries, as such we believe that we are uniquely placed to assist the entire Tasmanian economy in reducing its carbon footprint. In addition to mitigating end-of-pipe emissions through landfill diversion, organics processing, and methane recovery, the WARR industry is integral to creating a regenerative economy that is bolstered by reuse, remanufacturing and repair and will further enhance the reduction of indirect emissions, e.g., through the reduced extraction of virgin materials for product manufacturing, extended product lifespan, and more. WMRR advocates for this plan to not be viewed in isolation and that a systems-based approach be taken to ensure circular economy principles and the waste management hierarchy are incorporated in all plans.

The plan does not specifically mention scope emissions, however scope 3/ indirect emissions must be considered in all plans. 45% of global Green House Gas (GHG) emissions can be attributed to 'products'; the production of materials, products, and food (including the management of land). The remaining 55% of global GHG emissions are attributed to energy systems and energy for buildings and transportation.<sup>1</sup> The WARR sector is responsible for the safe management of products at end-of-life however has limited impact on products coming to market. WMRR calls on the government to work closely with our sector to be sure that we are able to drive the necessary change to mitigate emissions

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<sup>1</sup> Ellen MacArthur Foundation, "Completing the Picture: How the Circular Economy Tackles Climate Change" (2021)

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037  
  
(02) 8746 5000  
INFO@WMRR.ASN.AU  
  
**WMRR.ASN.AU**



as well as using the sector's material outputs as feedstock for broader industry, reducing reliance on virgin materials and also assisting with carbon mitigation.

While the plan focuses on organics recovery it is out of step with the current challenges faced, particularly when it comes to understanding the quality of inputs available to the WARR sector are reflected in outputs. For example, if contaminated material goes in, a contaminated product will be the end result. Currently organics recovery is hindered by contamination (eg packaging and plastics) and chemicals such as PFAS/ PFOS. Until PFAS is eliminated from upstream products this will continue to be an issue in Tasmania with organics unable to be recovered and circulated in the economy.

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

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>1. How can we build on the work already underway to reduce emissions and build resilience in the waste sector?</p>	<p>Firstly, regarding waste streams the plan must go beyond organics and investigate the Commercial and Industrial (C&amp;I) and Construction and Demolition (C&amp;D) streams. As a minimum this should start with the bottom of the waste management hierarchy (landfill diversion) and build up from there to investigate recycling, repairing and reuse pathways, as well as the use of recycled materials in broader manufacturing to reduce reliance on virgin materials. WMRR supports organic diversion and encourages the department to mandate organic recovery from C&amp;I waste, not just municipal solid waste. This will require support for processing infrastructure and market development for recycled organics use in agriculture to regenerate soils and nature.</p> <p>Moving higher up the hierarchy, WMRR encourages the department to consider developing a strong avoidance strategy such as Love Food Hate Waste for the community, which would build on local Tasmanian <i>Eat Well</i> initiative. Further, systematic production changes (alternative market development, crop diversification, harvesting efficiencies) as well as value-adding business ideas (preserve, distil, ferment, dehydrate) to prevent the waste creation in the first instance while adding benefit and/or reducing expenses will all assist and complement. An avoidance campaign should be at the forefront in order that infrastructure investment is future fit, leaves money in householder's pockets, and does not result in stranded organics assets.</p>
<p>2. What future opportunities do you think will have the most impact?</p>	<p>WMRR suggests a few clear investment areas to compliment the inclusion of C&amp;I and C&amp;D in the plan, including:</p> <ul style="list-style-type: none"> <li>• A state-wide education and behaviour change platform with incentives.</li> <li>• Tasmanian re-manufacturing using recycled/recovered material.</li> <li>• Sharing economy business models that reduce waste (product libraries, repairs cafes, sharing platforms).</li> <li>• Precinct areas.</li> </ul> <p>WMRR would suggest an explicit focus on market development for the use of recycled products focusing on the remaining four (4) priority materials from the National Waste Report (Plastics, Construction, Transportation and Textiles) and encourage the development of green procurement targets for all levels of government which would include clear targets for dollars and tonnes of recycled materials. Best practise without targets removes an element of accountability that is crucial in changing behaviours to align with the higher order circular economy principles and creating demand for recycled material that replaces virgin as a feed stock for new products. The</p>

	<p>plan must assist in developing the requisite market demand and therefore infrastructure investment and employment in Tasmania.</p> <p>WMRR supports the government's interest in energy recovery from organics. However, as stated above the priority should be avoiding the creation of this waste stream in the first place, which is vital in current economic times.</p>
<p>3. Are there any priorities or future opportunities missing from this draft Plan?</p>	<p>WMRR also supports a focus on local circular manufacturing, recycling and redesign. However, reiterates that securing demand for secondary raw materials requires strong regulatory action, and as mentioned above needs government initiatives to support growth in demand.</p>
<p>4. Are there other ways we can collaborate to reduce emissions and build resilience in the waste sector?</p>	<p>WMRR encourages the department to follow the example set by Sustainability Victoria and Ecologiq in Victoria, and continue to emulate the work these organisations have done in developing industry policies that focus on material design, sustainable procurement and market demand, which is then supported with comprehensive infrastructure plans and targeted funding arrangements to meet State targets.</p>