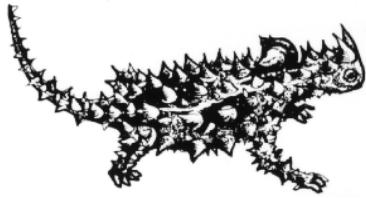


# Arid Lands Environment Centre, Inc.



Office 90 Gap Rd, The Gap  
PO Box 2796 Alice Springs  
Mail NT 0871 Australia  
Phone +61 (08) 8952 2497  
Fax +61 (08) 8953 2988  
E-mail [info@alec.org.au](mailto:info@alec.org.au)  
ABN 50 100 640 918

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## **Discussion Paper Updating the 2009 National Waste Policy: Less waste, more resources: ALEC Submission**

The Arid Lands Environment Centre (ALEC) is central Australia's peak environmental organisation that has been advocating for the protection of nature and ecologically sustainable development of the arid lands since 1980. ALEC plays an important role in waste management in the Alice Springs region by contributing to the development of appropriate and sustainable waste policy through collaboration with local government, industry and the community.

Alice Springs has great potential to demonstrate the possibilities of developing self-sufficient, micro industries that drive the circular economy. We therefore welcome the release of this document and recognise the important role it could play in implementing the circular economy in waste, provided it is properly enforced.

### **Operation of the Policy**

This submission will address each section and questions within the discussion paper. However, it is first necessary to outline key recommendations for improving the effectiveness and operation of the plan in driving sustainable waste management that delivers economic and social benefits.

The strength of the paper lies in recognising the importance of transitioning to the circular economy as well as acknowledging key targets to enforce the waste hierarchy. However, there are key terms in the document that are lacking in definitional detail and clear processes to drive their implementation. The paper needs to explicitly acknowledge the political and economic factors that currently operate as barriers to realising the potential of waste as a resource.

The discussion paper must acknowledge the vital role of legally enforceable guidelines, targets and processes to ensure the waste hierarchy is complied with at all levels of government. A key flaw in current waste policy is the overreliance on voluntary programs and strategies to deliver outcomes. While voluntary action has a role to play it will ultimately not deliver the entire systemic shift that is urgently needed to operationalise the circular economy.

### **Key issues:**

- Over reliance on voluntary mechanisms: voluntary action does not carry enough practical authority to achieve outcomes. In the absence of clear economic incentives to reduce waste, regulation has a critical role to play in enforcing sustainable actions.
  - Should include strategies for strengthening resilience in Australia's waste market to the fluctuations in global resource markets.
  - Needs to explicitly acknowledge the importance of reducing greenhouse gas emissions as a core environmental outcome of improved waste management processes.
  - There needs to be improved integration of available data such as the review of the product stewardship program and hazardous waste reports.
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**Principle 1: Avoid Waste**

Goal: A national target to reduce total waste generated in Australia per capita by 10% by 2030.

- 1.1 The 10% target by 2030 is too low. New Zealand is already achieving a 2000 kg per capita per year waste generation, compared to Australia (2500 kg per capita per year). By 2030, Australia should be able to reach the NZ per capita equivalent, which would be a 20% reduction.
- 1.2 A target to reduce waste generated sends a powerful message, that we should be avoiding waste production altogether, rather than relying on recycling to reduce waste to landfill. The Arid Lands Environment Centre submits that it would be beneficial to set specific targets for all sectors.
- 1.3 Feedback on strategies

Strategy	Proposed Milestones	Feedback
1	<ul style="list-style-type: none"> <li>• Voluntary commitment by businesses to reduce food waste</li> <li>• Interim goals for waste reducing</li> <li>• Food waste halved by 2030</li> </ul>	<ul style="list-style-type: none"> <li>• A legislative commitment for all businesses to reduce food waste would be far stronger than a voluntary program. For example, in France, supermarkets can no longer throw edible food away.</li> <li>• ALEC supports the interim goal setting, as a means of evaluating how the strategy is going.</li> <li>• ALEC supports the goal to reduce food waste by half by 2030.</li> <li>• ALEC supports a far wider strategy to avoid waste. Is there a mechanism that could be enacted to ban single use items from food serving? Requiring all food courts to return to a centralised system of serving food via washable crockery and cutlery would significantly reduce waste from the Commercial and Industrial sector?</li> </ul>
2	Design	<ul style="list-style-type: none"> <li>• ALEC supports legislative requirements to require manufacturers to offer replacement parts, manufacture products that meet minimum time periods eg. whitegoods that last a minimum of 15 years, during which time they are repairable.</li> </ul>
3	Knowledge sharing, education and behaviour change.	<ul style="list-style-type: none"> <li>• Educating the community on existing repair services and funding organisations to run toy libraries, tool libraries, etc. to promote sharing of products.</li> <li>• Support the repair of goods by requiring all manufactured products to be repaired by the company for the first 10 years of the object. Provide incentives for low-income community members to be able to access quality products.</li> <li>• Community education around meal planning, composting, gardening</li> </ul>

Other ideas:

- Legislate that all fresh produce (fruit, vegetables) is unpackaged and/or not packaged in plastic. This would reduce single-use packaging from food substantially. This could be achieved by:

- No packaging of fruit and vegetables
- Removal of plastic stickers from all fruit and vegetables (could be replaced with a biodegradable alternative or laser)
- Replacement of single use produce bags with reusable bags or single use paper bags.
- Provide financial assistance to all Councils to introduce a kerbside organic collection scheme for both residential dwellings and businesses, to reduce food waste.
- Ban the landfilling of food waste.
- AS a clear priority, ALEC supports the removal of all single-use plastic from the waste stream. This would reduce waste to landfill and protect animal habitat, which is being largely polluted by plastics.

## Principle 2: Improve Resource Recovery

2.1 ALEC supports the ambitious target of recovering 80% of all resource streams by 2030.

2.2 Targets could be set for both recycling and composting. Targets could also be set for all resource streams. ALEC supports separate targets for MSW, C&I waste and C&D waste.

2.3 Feedback on strategies

Strategy	Proposed Milestones	Feedback
4	Product Stewardship	<ul style="list-style-type: none"> <li>● A legislative requirement for all businesses to produce quality products with a minimum warranty period (eg. five years), the ability to be repaired, and requirements for goods to be recycled by the manufacturer at end-of-life.</li> <li>● ALEC supports the review of product stewardship schemes and the Product Stewardship Act, however we understand consultation has already been undertaken on this program. What action has resulted from that process?</li> <li>● ALEC supports the end-of life management system to be developed <i>and implemented</i> by 2020.</li> <li>● ALEC supports the aim of 100% of packaging designed to be reusable, or compostable by 2025.</li> <li>● We support the <i>elimination</i> of single-use plastic by 2025 to avoid the need to recycle. We favour the introduction of widespread compostable/biodegradable or reusable packaging by 2025. This must be supported by access to commercial composting facilities in all cities and regional centres.</li> </ul>
5	A common approach	<ul style="list-style-type: none"> <li>● We support all proposed interim milestones in this category.</li> </ul>
6	Improving access	<ul style="list-style-type: none"> <li>● ALEC supports the establishment of programs in collaboration with regional, remote and indigenous communities to access resource recovery infrastructure, such as kerbside recycling and kerbside organics recycling and associated education of communities.</li> <li>● ALEC also supports the involvement of first nations people in managing the waste crisis, through jobs creation around dismantling, repair, recycling and composting industries.</li> </ul>

7	Increasing industry capacity	<ul style="list-style-type: none"> <li>• Requiring all States and Territories to introduce a waste levy would result in increased funding for recycling and composting infrastructure. This is a current limitation in the N.T.</li> <li>• ALEC supports the use of mandatory targets for MRFs and the C&amp;D sector instead of voluntary standards.</li> </ul>
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**Principle 3: Increase use of recycled material and build demand markets for recycled products**

3.1 This target is strongly supported and encouraged. The current downturn in global demand for recyclable material requires Australian governments and business to commit to developing domestic recycling industries.

3.2 Instead of a flat out 30% target across all goods and infrastructure, it may be possible to set adjustable targets to achieve higher rates for goods that are capable of being recycled at a greater rate. For example, it could be economically feasible in a short amount of time to require all road construction to use crushed glass.

3.3 Strategy 8: This strategy is supported. It is again important to acknowledge the need to not treat all waste streams as having equal recycling potential and that certain products may be better incorporated into sustainable procurement policies than others. This strategy will only be viable if there are incentives and frameworks developed to facilitate the growth of industries that make products from recycled material.

Strategy 9: Supported. The review of regulatory barriers should however be commenced as a matter of urgency. Recyclable material is already beginning to stockpile, which demonstrates the immediate need to develop domestic recycling initiatives with complementary markets in products. While the intent of having business take this consideration into account is supported, this strategy again would be strengthened by being able to utilise regulatory instruments and controls. Voluntary action alone will not be capable of driving rapid market changes that produce viable quantities of product from recycled material.

3.4: Another action would be through introducing increased regulatory powers to encourage uptake of procurement targets.

3.5: The Department of Environment and Energy could be responsible for implementation.

**Principle 4: Better manage material flows to benefit human health, the environment and economy**

4.1 The principle of the target is supported but there is a practical issue with the implementation because of the ambiguity in the terms ‘problematic’ and ‘unnecessary’. To commit to this target there will need to be a broad consultation with industry experts and environmental groups on what constitutes unnecessary packaging and problematic plastics before 2020.

4.2 Again the issue here is not the target but the process for implementing process to reach that target. Without more information around implementation strategy a target will not be enough.

4.3 Plastics - The strategies and targets are supported. The milestones should be expanded to include key stages in the development of regulation necessary to achieve those targets. These targets will only be achievable through committing to legislatively enforceable actions including penalties and other coercive measures.

Chemical and Hazardous Waste – The principle of these milestones is supported. However, there are again issues with uncertainty and ambiguity.

‘Manage’ does not suggest any specific instrument or process that could be utilised to achieve desired outcomes. Hazardous waste in Australia is currently poorly managed because there is no overarching inclusive policy that ensures compliance without international obligations under the Basel and Stockholm conventions. There is already a wealth of information and research conducted into hazardous waste which outlines management options, acknowledging that each stream of hazardous waste has appropriate reuse, recycling or final disposal options. Hazardous waste policy should be developed that ensures each waste stream is appropriately managed in accordance with the waste hierarchy and our obligations under international law. The use of product stewardship for batteries is supported. This could be expanded to other listed wastes through co-regulation. Voluntary actions are currently failing, and this is obvious with the stockpiling of hazardous waste around the country.

Organic – This strategy is supported and strongly encouraged. Additional milestones should be added which require the development of a plan to grow commercial composting industries from organic waste. There should also be a process for measuring the greenhouse emissions abated by the reduction in total organic waste in landfill. This will open the strategy up to considering additional environmental and economic benefits. Another strategy could be to encourage partnerships with food retailers and community organisations that use leftover food such as the second bite program.

4.4 Clear, legislatively enforced targets complemented with transparent process will be necessary to drive this shift in management.

4.5 The Department of Environment and Energy as well as industry should be responsible for implementing these targets.

**Principle 5: Improve information to support innovation, guide investment and enable informed consumer decisions**

5.1 The principle is supported but a timeframe is needed. The design and format of the data will need to be targeted towards specific needs of community, business or government.

5.2 The parameters of this target should be further refined; what form of data is being contemplated here. It should be total national stockpiles, export and imports to allow for more accurate market signals that will drive the development of domestic processing industries.

5.3 Rather than reviewing existing recycling data collection, it is vital that the data is compiled to assess the impact of the Chinese Sword policy on Australian recycling markets. The urgent issue here is not the method of collection but processing, transport and export. Support analysing barriers to developing stronger domestic markets in recycled goods. The 2025 target for supported innovation is too long. Research and innovation should be a core priority commencing at the beginning of the next decade.

5.4 To reiterate, legislative mechanisms are necessary to drive the development of markets and ensure consistent, transparent and accountable information is compiled and published. Accurate and reliable data will only be acquired through developing a clear regulatory process. Relying on voluntary reporting will not provide a holistic picture that captures the entire waste system.

5.5 This principle is best achieved through collaboration and partnership with waste producers, collectors and processes with administrative and regulatory support resting with the Department of Environment and Heritage.