



8 March 2016

Nick Heath
General Manager
City of Hobart
GPO Box 503
HOBART TAS 7001

Re: Draft Waste Management Strategy 2015 - 2030

Dear Mr Heath,

Thank you for the opportunity to comment on the City of Hobart (CoH) Draft Waste Management Strategy 2015-2030 (the Strategy). It is a high quality document, complete with well researched and transparent statistics, and we appreciate the efforts of the well-intentioned CoH waste team and the overarching push towards zero waste.

Sustainable Living Tasmania (SLT) is a not-for-profit, public interest community service working to bring about sustainable environmental and social outcomes in Tasmania. Our objectives include inspiring Tasmanians into action and equipping Tasmanians to live sustainably.

Below the background snapshot table, we have listed the actions we believe should be prioritised to improve waste management both in Hobart and Tasmania wide. We recently ran a workshop to capture ideas from our members about the Strategy and have also incorporated these ideas in our submission.

We appreciate the opportunity to make these comments. Please do not hesitate to contact us if you wish to discuss anything raised in this submission.

Kind regards,

A handwritten signature in black ink, appearing to read "Todd Houstein".

Todd Houstein
Executive Officer

Background snapshot

| | |
|---|--|
| <p>Australia:</p> <ul style="list-style-type: none"> • 29 million tonnes of material recycled • 20 million tonnes of waste landfilled • Recycling rate of just under 60% | <p>Tasmania:</p> <ul style="list-style-type: none"> • 200 thousand tonnes of material recycled • 400 thousand tonnes of waste landfilled (concrete rubble, road pavement, glass, bricks and industrial stockpiles are not included in this statistic) • Recycling rate of around 33% (less because 75% of 'reported recycled glass' is landfilled) • We bury 771kg per person per year |
| <p>Tasmanian municipal landfills bury:</p> <ul style="list-style-type: none"> • 42% food and green waste • 18% cardboard and paper • 13% recyclable plastics • 20% building materials <p>(National Waste Reporting 2013)</p> | <p>McRobies bury:</p> <ul style="list-style-type: none"> • 29% food and green waste • 5% cardboard and paper • 5% plastics • 42% building materials. • over 50% from business. <p>(Waste Strategy)</p> |
| <p>Currently recycled through the resource recovery facility:</p> <ul style="list-style-type: none"> • Cardboard/paper • Concrete • E-waste • Phone and batteries • Green waste • Engine oil • Tyres • Steel • Tip shop wonders | <p>Currently recycled through kerbside recycling:</p> <ul style="list-style-type: none"> • Cardboard/paper • Plastic beverage containers • Plastic milk containers • Other large plastic containers (laundry detergent, etc.) • Steel cans • Aluminium cans • Glass is accepted but 75% ends up in landfill and glass shards reduce the quality of other recycling stocks such as cardboard and paper. |
| <p>Cost to landfill wastes</p> <p>NSW landfills charge around \$355 per tonne (\$133 of this is paid to the State Government as a levy). The current Tasmanian rate is around \$80 per tonne (or less for high annual usage customers).</p> | |

Actions to prioritise

Advocacy for State/Federal Government action to reduced waste creation and landfilling

We believe that advocacy should be the priority, the reason being that although most businesses want to do the right thing, they are also economically rational and will only implement waste reduction strategies to the extent limited by cost and return. Pricing structures to incentivise better recycling and composting are therefore essential.

Tasmanian landfill gate fees are too low to cover the true costs of operation, pollution control and rehabilitation, so the onus falls to rate paying households, who in turn fund only the cheapest waste management options. It is time to transfer the onus to the waste producers by accurately pricing landfill, this is fairer and will lead to positive waste reduction outcomes.

In addition, artificially cheap landfill is biasing the market and has created anti-competitive forces, undermining recycling and resource recovery opportunities. Higher landfill prices create the headroom for recyclers to operate competitively.

| Our recommended priority actions | Equivalent CoH Waste Strategy Ranking |
|---|---|
| Accurately price McRobies landfill | 1 |
| Advocate to the State Government for a state based waste levy (similar to the NSW levy but introduced over five years) | 2 |
| Advocate to the State Government for the establishment of state waste reduction targets | 42 |
| Lobby for additional product stewardship programs to be regularly implemented through the National Waste Policy ¹ | 20, 4, 24, 38, 49, 50, 53, 62, 65, 67, 68, 72, 81, 83, 84 |
| Work with the EPA and other facilities to establish common definitions for waste and introduce mandatory reporting of concrete rubble, road pavement, glass, bricks (currently classified as 'clean fill') and industrial on-site stockpiles. | 30 |
| Work with the EPA to improve commercial composting planning processes (to provide confidence for the commercial composting industry). | |

Encourage source separation to reduce mixed loads coming to the facility

Waste that arrives at the facility sorted into different materials, increases the rate of recycling. Mixed loads make it very difficult for landfill and Resource Co-op staff to divert materials to recycling and reuse.

¹ wastes include C&D wastes, polystyrene, batteries, oils, fluorescent light globes, paint, plastics, mattresses, quilts, e-waste, flexible plastics, steel, textiles, tyres, timber, plasterboard and masonry items

| Our recommended priority actions | Equivalent CoH Waste Strategy Ranking |
|---|---------------------------------------|
| Implement mandatory waste reduction (e.g. procurement surveys and waste reduction reports) and recycling requirements, plus training and assistance: <ul style="list-style-type: none"> on all City coordinated events and non-city coordinated events within the jurisdiction; and within all City Government agencies (including schools, hospitals etc.) | 2, 3, 5, 54, 69 and more |
| Include enforceable clauses in the planning process to ensure that construction and demolition (deconstruction) projects require source separation and recycling/reuse plans and action. | Partly 7 |
| Establish a regional long-term solution for glass recycling, including market options (e.g. bottle re-use scheme and glass recycling- back into glass). Our investigations have lead us to believe that approximately 75% of post-consumer glass ends up in landfill. | 17 |
| Provide households with two landfill vouchers each year to avoid receiving and processing too much waste on one weekend (less separation) | 64, 34, 24 |

Commit to diverting food waste from landfill by 2018

Organics in landfill are a wasted resource, produce methane and contaminate other resources that could otherwise be recycled at waste management facilities.

| Our recommended priority actions | Equivalent CoH Waste Strategy Ranking |
|--|---------------------------------------|
| Commit to diverting food and green waste from landfill by 2018 | partly 4, 46, 47 |

Encourage community involvement

Once the price indicators are in place, and diverting waste is a financially advantageous option, City of Hobart should encourage the community to find novel ways to reduce, reuse and recycle waste. The Draft Strategy lists many worthwhile engagement programs and activities. An additional idea is to target popular culture and encourage businesses to introduce waste reduction strategies, for example offering a reduced price for BYO coffee cups, or drinks without a straws.