

Response ID ANON-XJT9-4W6F-P

Submitted to **Discussion Paper – Updating the 2009 National Waste Policy**

Submitted on **2018-10-05 16:52:19**

Introduction

Confidentiality

1 Is this a confidential submission?

No

2 What is your name?

Name:

Jane Bremmer

3 What is your organisation? (if applicable)

Organisation:

Zero Waste OZ and National Toxics Network

4 What is your email address?

Email:

acejane@bigpond.com

5 What is your residential address?

What is your address?:

47 seventh ave, Bassendean, Perth Western Australia

Circular Economy Principle 1: Avoid waste (target)

6 The discussion paper proposes a national target to reduce total waste generated in Australia per capita by 10 per cent by 2030.

Targets - Target:

Disagree

Additional comments:

This target is way too low for an advanced nation like Australia. Other similar countries are able to achieve far greater national targets for waste reduction. San Francisco and many cities in Europe which have similar demographics to Australia are achieving more than 75% diversion from landfill and lower waste generation per capita than this target proposed. Australia can do much better simply through better source separation at home and in the workplace. Zero Waste strategies can dramatically reduce the generation of waste through removing all organics and recyclables from the waste stream leaving a small amount of residual waste that can be better managed and reduced through education and stronger materials production regulation. Given most residual waste is plastic, greater regulation for plastic packaging and products can reduce this residual waste stream significantly reducing the need for expensive and risky disposal options. Australian citizens currently produce nearly 1.5 tonnes per year of waste compared to EU citizens who are producing 480kg/year....this is because of the superior waste management systems, investment in public education and direct incentives and support the EU provides for waste reduction.

<https://ec.europa.eu/eurostat/web/products-eurostat-news/-/DDN-20180123-1>

7 Is there a different target that should be included?

Can you suggest a better target?:

Australia should have a national target for total waste generated so as to be able to clearly see the climate, energy and environment costs of our total waste generation.

Australia also needs to have a per capita target to promote individual and consumer behaviour towards waste reduction and to identify where exactly the problems in Australia lie- both for consumers, commercial and industrial waste generation.

Targets should be directed at generation and not landfill. Landfill represents one disposal outcome but not all. Our national aim should be to reduce waste disposal not a particular disposal technology. In some instances landfill of clean dry residuals is a better option than waste to energy incineration or plastic to fuel technologies. Australian should learn the lessons from other countries who have made the mistake of focusing on a landfill diversion target which in effect hid waste dumping, burning and stockpiling with no economic or environmental benefit.

Yes targets should be set for each waste category. C&D and C&I sectors generate large volumes of residual and contaminated wastes and require greater regulation to prevent environmental harm. These waste streams have not historically provided reliable data and this needs improvement.

Circular Economy Principle 1: Avoid waste (strategies and milestones)

8 Do you agree with strategies 1, 2, and 3 and related proposed milestones?

Strategies 1,2,3 - Strategy 1:

Agree

Strategies 1,2,3 - Strategy 2:

Agree

Strategies 1,2,3 - Strategy 3:

Agree

Additional comments. If you suggest other strategies or milestones, please explain why.:

The cornerstone of a circular economy is Zero Waste policy. This should be highlighted and embedded in the National Waste Strategy. In particular there needs to be a more robust and directed strategy around packaging. This is because plastic packaging makes up the bulk of most residual waste streams. Government procurement policies should also be included. Schools, hospitals and other public and government entities should also be included.

9 What other action is required to meet the target?

What other action is required to meet the target?:

Targets and actions will not be enough to address the waste crisis. Government must legislate and regulate the causes of waste generation such as plastic packaging, product design and improved waste collection and management systems.

<http://www.europarl.europa.eu/EPRS/EPRS-Briefing-573936-Circular-economy-package-FINAL.pdf>

<http://ec.europa.eu/environment/waste/waste-to-energy.pdf>

10 Who should be responsible for implementation?

Who should be responsible for implementation:

This must be a whole of government approach. All levels of Government in an integrated way through National Policy and Regulation, States should implement and measure progress in cooperation with Local Governments. Proactive community engagement must support a whole of government approach.

Circular Economy Principle 2: Improve resource recovery (target)

11 The discussion paper proposes a national target of an 80 per cent average recovery rate from all resource recovery streams, following the waste hierarchy, by 2030.

80% resource recovery target - Target:

Neutral

Additional comments:

We should be aiming higher for a 2030 target. Simple actions now can achieve this target already. Enshrining a 20% disposal outcome just leaves the door open for unsustainable disposal technologies to hijack the opportunity for better waste management outcomes and the continuation of product design failures.

12 Is there a different target that should be included?

Can you suggest a better target?:

There should be targets for each waste sector and also targets for avoidance, reuse and recycling.

Circular Economy Principle 2: Improve resource recovery (strategies and milestones)

13 Do you agree with strategies 4, 5, 6 and 7, and related proposed milestones?

Strategies 4,5,6,7 - Strategy 4:

Neutral

Strategies 4,5,6,7 - Strategy 5:

Agree

Strategies 4,5,6,7 - Strategy 6:

Agree

Strategies 4,5,6,7 - Strategy 7:

Neutral

Additional comments. If you suggest other strategies or milestones, please explain why.:

4. Product stewardship requires legislation and regulatory support. Given the local and global environmental impacts of waste government must not partner with industry but guide and regulate for change.

7. Energy recovery of waste is not a priority or a preferred option under the Australian...or any waste hierarchy. The focus should be on avoidance and reuse of waste...not disposal outcomes through recycling and energy recovery. Organic waste is better composted and returned to our biosphere, reusable and recyclable

materials should be removed and sent back to the manufacturer through Extended Producer Responsibility schemes and Container deposit schemes and our residual waste should be isolated and investigated to determine how to eliminate it from our systems....not burnt for energy or landfilled or exported. There are safer technologies (ie Gas Phase Chemical Reduction, Sanitech, Material Recovery and Biological Treatment (MRBT) and secure residual waste landfills) to deal with residual waste. http://www.ecocycle.org/files/pdfs/best_disposal_option_for_leftovers_on_the_way_to_Zero_Waste.pdf

14 What other action is required to meet the target?

What other action is required to meet the target?:

Zero Waste Policy.

15 Who should be responsible for implementation?

Who should be responsible for implementation?:

A whole of government approach is needed.

Circular Economy Principle 3: Increase use of recycled material and build demand and markets for recycled products (target)

16 The discussion paper proposes a national target of a 30 per cent average recycled content across all goods and infrastructure procurement by 2030.

30% recycled content target - Target:

Disagree

Additional comments:

This target should be higher for plastic packaging industries.

Recycled materials in the C&D sector require greater scrutiny due to the hazardous materials that concentrate in this waste stream and have the potential to accumulate and increase the toxicity and hazard of the resulting recycled products. for example cement especially.

17 Is there a different target that should be included?

Is there a different target that should be included?:

Circular Economy Principle 3: Increase use of recycled material and build demand and markets for recycled products (strategies and milestones)

18 Do you agree with strategies 8 and 9 and related proposed milestones?

Strategy 8,9 - Strategy 8:

Disagree

Strategy 8,9 - Strategy 9:

Disagree

Additional comments. If you suggest other strategies or milestones, please explain why:

This strategy must be legally mandated otherwise industry will exploit this lack of regulation and the milestone will not be met. While the plastics industry prepares for a massive increase in production, how will governments and consumers be able to compete with cheaper new plastic raw materials while recycled materials are more expensive.

19 What other action is required to meet the target?

What other action is required to meet the target?:

Legislate for recycled content in our materials production processes.

20 Who should be responsible for implementation?

Who should be responsible for implementation?:

Federal Government

Circular Economy Principle 4: Better manage material flows to benefit human health, the environment and the economy (targets)

21 The discussion paper proposes a national target to:(a) phase out problematic and unnecessary plastics by 2030(b) halve the volume of organic waste sent to landfill by 2030.

CE4 targets - (a) Phase out problematic and unnecessary plastics by 2030:

Disagree

CE4 targets - (b) Halve the volume of organic waste sent to landfill by 2030:

Disagree

Additional comments:

Problematic wastes must be eliminated now...not phased out by 2030. We saw the result when a microplastic in cosmetics ban was threatened...why wouldn't the government move to have problematic and unnecessary plastics eliminated asap given the catastrophic impacts they have caused globally and especially in our marine environment and food chain.

There is no need to send any organic waste to landfill right now. This is the easiest waste stream to divert and should be done immediately A target of 90% is achievable right now.

22 Is there a different target that should be included?

Is there a different target that should be included?:

Circular Economy Principle 4: Better manage material flows to benefit human health, the environment and the economy (strategies and milestones)

23 Do you agree with strategies 10,11 and 12, and related proposed milestones?

Strategies 10,11,12 - Strategy 10:

Agree

Strategies 10,11,12 - Strategy 11:

Agree

Strategies 10,11,12 - Strategy 12:

Agree

Additional comments. If you suggest other strategies or milestones, please explain why:

Australia needs to align its chemicals and waste policies with other similar EU and US countries right now.

24 What other action is required to meet the target?

What other action is required to meet the target?:

25 Who should be responsible for implementation?

Who should be responsible for implementation?:

Circular Economy Principle 5: Improve information to support innovation, guide investment and enable informed consumer decisions (target)

26 The discussion paper proposes a national target for fit-for-purpose and timely data to be available for individuals, businesses, and governments to make informed decisions.

CE5 target - Target:

Agree

Additional comments:

27 Is there a different target that should be included?

Is there a different target that should be included?:

Circular Economy Principle 5: Improve information to support innovation, guide investment and enable informed consumer decisions (strategies and milestones)

28 Do you agree with strategies 13 and 14, and related proposed milestones?

Strategies 13,14 - Strategy 13:

Agree

Strategies 13,14 - Strategy 14:

Agree

Additional comments. If you suggest other strategies or milestones, please explain why.:

29 What other action is required to meet the target?

What other action is required to meet the target?:

30 Who should be responsible for implementation?

Who should be responsible for implementation?: