

Circular Economy consultation – responses submitted online on Friday 23rd November

Do you support NSW having a circular economy policy? Why or why not?

We do support the State Government's ambition to deliver and implement a Circular Economy Policy but note that while many current policies support an approach to a circular economy, it is not currently linked to any legislative or regulatory drivers or supported by funding that has not already been allocated. We note that case studies presented in the discussion paper required significant investment. We support a portion of funding coming from the NSW waste levy.

What would you like to see in a Circular Economy Policy?

In a circular economy policy, we would like to see practical application across the focus areas as well as drivers for industry to make changes including supporting research and development leading to innovation in product design and packaging, adaptive procurement thresholds and high quality and consistent recycling. There is concern that the transition to the circular economy seems to imply the drivers will come from the waste industry. Drivers in the UK such as taxes on packaging that does not contain recycled content could be far more effective in driving investment in infrastructure that will capitalise on current market opportunities. The policy statement needs direct links to the National Waste Policy which will *hopefully* include regulated targets set by the APCO. Objectives and targets included in the policy need to be embedded from the top down, including all NSW Government Departments in all aspects of procurement and contracts and linked to instruments to meet targets, whether economic or regulatory, otherwise we see limited incentive for change. An example of this is the NSW Premier's target of 40% litter reduction by volume by 2020. This was an ambitious target that will be met because it was supported through a multi-tiered approach, targeted funding and localised actions. A true transition to a circular economy, as depicted in the life cycle on page 15 of the discussion paper; with prioritisation of the design, modularise and repair phases through industry led, government administered EPR schemes. This has to be supported by consistent ongoing education of consumers. Prioritisation of funding for different circular economy models to encourage industry led change as an attractive business option, rather than a reliance on social enterprises for enablement, e.g. return and repair, or leasing models. Additionally, we would like to see an independent body established to oversee the transition, work across sectors, data collection and reporting schemes and education.

How could the Government support a transition towards a Circular Economy?

We believe the Government can support a transition to the Circular Economy by returning the waste levy in prioritised funding under the following legislated key drivers; • Minimum thresholds for product design, • Responsible and recyclable (within Australia) packaging by 2025, • Mandatory product stewardship expanding to include repair and reprocessing as a responsibility of the producer • Adaptive procurement thresholds including minimum levels of recycled content • High quality and consistent recycling • Mandatory organics recycling

What are the main barriers to the implementation of a circular economy? (pick up to three)

Government policy and legislation
Lack of funding for research and development
Collaboration across supply chains

Support innovation

How could a new or improved research support platform support circular economy?

Funding for improved research has application across all key focus areas and should be a State Government priority to return levy money to support R&D and in turn, innovation across both local Government and Industry.

What services and support would you like to see a circular economy innovation hub provide?

An innovation hub would need to be established as an independent organisation to support research and development as a cross collaboration effort between Local Government and Industry or potentially utilise existing programs with longer term funding. Programs currently exist, supported through Department of Industry and

various Universities (UoW Advantage SME) with matched funding to assist SME's to invest in R&D and thereby improve productivity. Success is varied depending on drivers, input and market for the product. As with previous comments, without funding, legislative and market drivers, industry will not make changes.

Do you have a comment about this focus area?

Nothing further

Procurement

What purchasing decisions do you make where circular economy principles can be applied?

Under ISJO's Procurement program, we provide member Councils with procurement advice and tender for and award regional procurement contracts. There are opportunities for ISJO to build circular economy principles into our regional procurement guidelines.

How do you think the NSW Government could increase the use of re-usable and recyclable material through its purchasing decisions?

There is currently a disjointed approach between departments at both state and local government level to procurement and use of recycled content materials, e.g. glass or other recyclables in road base.

Do you have a comment about this focus area?

Evaluation criteria needs to have a stronger focus on recycled content and the minimum standard needs to be legislated.

High quality, consistent recycling

What would help you with recycling more of the products you use?

Minimum standards block innovation however without minimum standards, there is the potential loss of control of MRF's. Demand needs to be tied to a higher legislative driver – packaging recyclability within Australia.

What can the NSW Government do to better support the recycling industry?

Government Policy and Legislation has the ability to remove all barriers to innovation and stop the exporting of resources. Alongside this, changes to specific State government policies could support innovation and change, e.g. providing exempt status for innovative trials at landfill sites or recycling facilities.

Do you have a comment about this focus area?

Nothing further

Value organics

Would you support zero food and garden waste to landfill?

Agree with zero food and garden waste to landfill, no agreement that FOGO is the solution that suits all situations.

What measures do you think would help organics become more circular and reduce food waste to landfill in NSW?

Food waste reporting from the commercial and industrial sector, including supermarkets needs to be more transparent to enable a more circular approach. There should also be publicly available data on supply chain waste to educate consumers, e.g. farm gate waste that supermarkets won't accept.

Do you have a comment about this focus area?

Nothing further

Mainstream product stewardship

How do you think product stewardship schemes can be expanded, and what products should be included in a product stewardship scheme?

There needs to be a regulated move to mandatory product stewardship schemes supported by national communication and awareness campaigns for retailers and consumers. This should be driven by industry and supported administratively by Government. The following products should be included with some already having small sale programs or social enterprises running them: - Textiles - Mattresses - Lounges and soft furnishings - Compressed and laminated timber products; including furniture, cabinetry - Single use coffee cups

Do you have a comment about this focus area?

Product stewardship has its place and great examples exist overseas. Successful schemes are industry driven and led and Government regulated and administered.

Responsible packaging**What actions would you like to see the NSW Government take to better support these national targets?**

- Standard labelling needs to be simple and easily understood by residents. Current APCO labelling system being trialled does not translate to Council kerbside recycling contracts.
- Incentivise industry to normalise compostable packaging
- Food safety standards are a blockade to changing packaging standards. Engage with Safe Food Australia to undertake R&D on packaging to enable standards to be applied to additional packaging types.
- APCO proposed targets need to be tightened to ensure packaging is re-usable, recyclable or compostable within Australia.

Do you have a comment about this focus area?

Nothing further

Support re-use and repair**What would encourage you to repair products you already own or choose second-hand products?**

- Ease of access to repair facilities - Warranties on repaired of second-hand items - Reduced repair cost through product stewardship model

Do you have a comment about this focus area?

The Councils support reuse and repair hubs as already exist through reuse stores attached to landfills or waste facilities as well as charities. Whilst social enterprise provide a role in this space, there is the risk of monopolising the capture, reuse and repair of products if other options are not funded alongside social enterprise. Purchasing second hand should be reflected in the price and often is not due to business overheads and unrealistic expectations from providers. Dedicated funding would alleviate overheads allowing for more accurate pricing models to be applied. Whilst Councils have a great opportunity through self-hauled materials and bulky waste collections, the resources required to divert that material from landfill often outweighs the benefits. Repair should be the responsibility of the producer and fall to the product stewardship scheme. If a robust product stewardship scheme existed, it would apply pressure to producers who are not manufacturing to the same quality as others in a similar market.

Better Design**How would information on durability and reparability of products impact your purchasing decisions?**

Information on packaging regarding modularised components that can easily be repaired or replaced would benefit consumers in purchasing decision.

Do you have a comment about this focus area?

Durability and reparability should be reflected by producers through warranties and as above relates back to Product Stewardship. If a robust product stewardship scheme existed, it would apply pressure to producers who are not manufacturing to the same quality as others in a similar market.