



6 May 2020

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SUBJECT: 20 Year Waste Strategy for NSW

Introduction

Thank you for the opportunity for NetWaste to provide input into the development of the NSW 20-year strategy. Our member Councils are involved in a wide range of important waste management and recycling activities supplying essential services to regional NSW. This includes the delivery of a broad range of services to many stakeholders including resource recovery, infrastructure investment, collection, community engagement, education and responsible management of Council managed residual resources and landfill space.

NetWaste supports the regional Councils waste and recycling activities and is aware that the region manages an extremely large, varying, valuable regional asset. Resource management for the NetWaste region is extremely challenging for Local Government as there is such a diverse range of Councils. Due to this diversity, a one size fits all approach is highly inadequate, and does not represent the best value from regional Councils. The release of this strategy will hopefully create opportunities for NetWaste Councils to increase their efficiencies, and in turn protect the environment whilst capturing opportunities to build the economy with localised industry and jobs.

Waste management is a shared responsibility. For regional NSW to fully manage its waste and recycling it must be supported by Government with robust regulation, policy, and funding.

Background

NetWaste is a collaborative environmental management project sponsored by the NSW Environment Protection Authority (EPA) and the Central West (CENTROC) and Orana Regional Organisation of Councils (OROC), located in the central and western regions of New South Wales, Australia. The region comprises 26 councils, covering a total area of 310,000 square kilometres and supports a population of more than 400,000 people.

Covering almost 40% of the state, member councils include: Bathurst, Blayney, Blue Mountains, Bogan, Bourke, Brewarrina, Broken Hill, Cabonne, Central Darling, Cobar, Coonamble, Cowra, Dubbo Regional, Forbes, Gilgandra, Lachlan, Lithgow, Midwestern, Narromine, Oberon, Orange, Parkes, Walgett, Warren, Warrumbungle and Weddin. Note that the former Wellington Council recently amalgamated with Dubbo City Council to form Dubbo Regional Council.

The NetWaste model delivers on collaborative waste projects and education strategies with the opportunity to share resources and knowledge, and coordinate planning at regional and sub-regional levels. NetWaste is supported financially by the NSW EPA Waste Less Recycle More initiative funded from the waste levy, noting this will be replaced by the 20 Year Waste Strategy.

Whilst participation in projects is voluntary, consultation and involvement of community and industry in the planning process have been key factors in the implementation of an increasing number of successful programs.

The adopted objectives of the organisation are as follows:

1. To maintain a waste management model that promotes collaborative, cooperative, and cost effective environmental best practice for participating councils
2. To develop effective educational strategies
3. To identify and complete projects as part of environmental management planning processes.

A key role of the NetWaste alliance is to develop and assist in the implementation of a regional waste strategy which links with and supports national, State and local waste strategies and policies.

Voluntary Regional Waste Groups – NetWaste



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The Steering Committee, made up of key representatives from member Councils, meet quarterly to consider strategic planning and project initiatives including deliberation over financial/budgeting strategies. The quarterly forum meetings made up of representatives from member Councils consider project initiatives and their potential participation. Meetings are convened at various locations within the region.

NetWaste believes that the Government must take this opportunity to show leadership and drive the changes that are required for the industry, and in turn support the Regional Councils that must accept the resource loss currently being experienced in rural NSW. NetWaste will look to enhance the regional diversion rates through the strategy by initiating small and large scaled projects through funding initiatives. Whilst NetWaste does have its challenges, being an extremely large and diverse area, there are many examples of collaborative projects which have and will continue to increase the region's overall waste recovery targets.

Process

NetWaste has surveyed 26 Councils in the region and has found that the following circular economy directions do align overall with regional waste needs, and the 20 Year Waste Strategy.

NetWaste would like to see an integrated approach by the NSW State Government, and to treat waste and resource recovery as a shared responsibility. NetWaste would like to see further investment in the regional areas, and in doing so building a stronger network and economy based on the strategy directions. Due to the extensive distances between Councils, resource recovery could be initiated, however without localised processing and access to end markets, the process is compromised with little to no investment.

In order to ascertain the importance of regional waste management and recycling, NetWaste has conducted an extensive waste survey in relation to the Issues Paper and how the 20 Year Waste Strategy will benefit the region. The 26-member Council group has recognised the following directions, and how they may align the future of waste management in the region. Although some of these initiatives may not be undertaken in every Council, their introduction may have a beneficial flow on effect for rural NSW.

The NetWaste region has had many successes in regard to recycling and waste projects through the WLRM grant funding and are keen to explore what future opportunities exist with the release of the new 20 Year Waste Strategy. The area has shown incredible resilience over the last two years with increased drought and bush fires. Whilst not entirely linked to resource recovery, it does play its part in the growth of towns, which does affect the circular economy of a region by which many rural areas solely rely on.

The introduction of a kerb side food and organics collection service, and Community Recycling Centre Hubs (CRCs) to several medium to large Council areas such as is proof that the region is adaptable and accepting of further long-term sustainable outcomes. NetWaste has always been supportive of collaborative projects and are unified through multiple Council waste and recycling contracts.

Without funding from WLRM none of these projects could have taken place. Funding to the NetWaste Councils is critical to the regional development and is important to the future of increased resource recovery and diversion of waste from landfill. By having this collaborative approach to funding, future services could be replicated further West to encapsulate smaller Councils not capable of establishing services (such as kerb side dry recycling) on their own.

Directions: Comments and Recommendations

As stated, NetWaste has issued a survey to the 26 member Councils in the regional area and through this extensive process identified the most important issues facing regional NSW through the 20 Year Waste Strategy Issues Paper. The following submissions provide a snapshot of the NetWaste region, and what challenges and successes Councils face within the waste industry. It will provide insight to the EPA of how Councils can utilise a best fit within the directions of the 20 Year Waste Strategy.

Alignment of 20-Year Waste Strategy directions with a circular economy approach



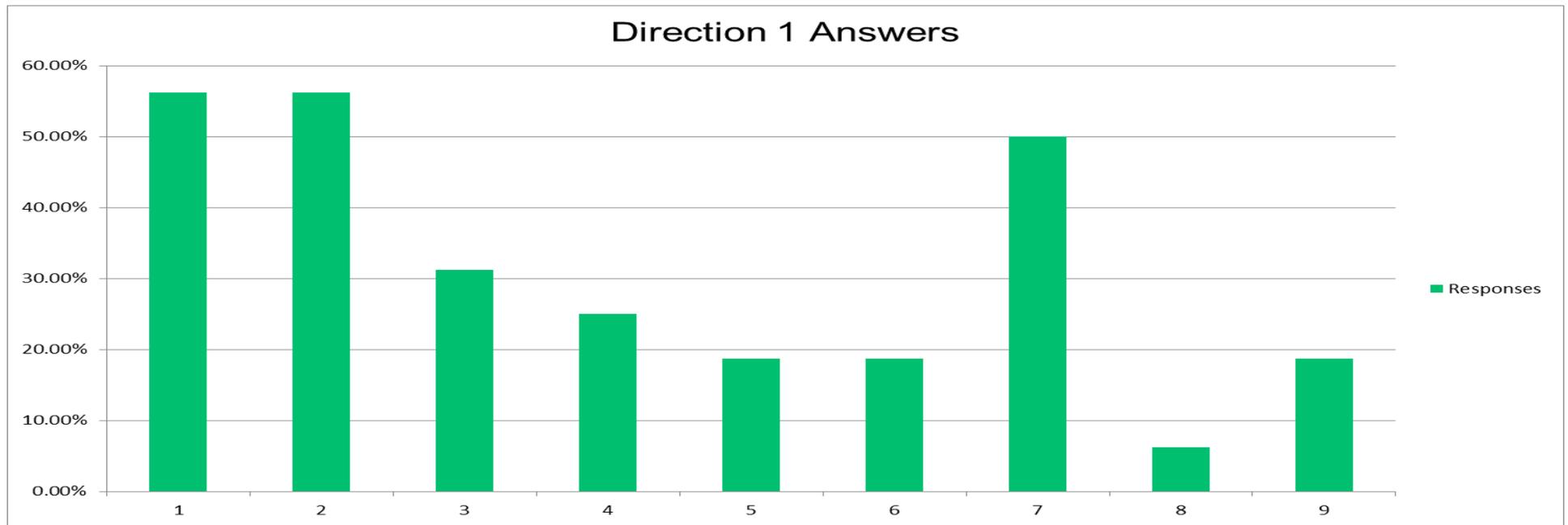
From the collated NetWaste survey data, the far most popular two (2) directions that the NetWaste region support (chosen from the four directions in the Issues Paper above) are:

Direction 3 - Plan for infrastructure and Direction 4 - Create end markets.

Both directions are somewhat critical for the region's waste and recycling needs with greater strategy and funding required in both fields. These 2 directions are regarded the most beneficial for NetWaste in creating the most sustainable flow on effects in regional NSW.

Direction 1 – Generate less waste and Direction 2 – Improve collection and sorting have their place in the circular economy, however, do not necessarily drive that economy in rural NSW where population and funding are much lower. With a waste strategy placing greater emphasis on 3 & 4 for the NetWaste region, this would allow significant progress. The ability to shift end markets and services West will create more businesses. This should create a much needed boost for the regional economy, so as to replicate metro based circular economy Council procurement models. Additional Council services combined with modern integrated waste and recycling systems, will greatly assist in the ongoing resource management of waste. The survey has given the following answers:

Q. Direction 1 Generate less waste - What reduction programs would be a best fit for participating regional councils in regard to this? Three most important and relevant future directions from your regional Council's perspective.



- 1 Mandatory extended producer / retail responsibility
- 2 Greater reduction in single use items and products through education
- 3 Considering waste disposal and environmental costs in future Local Government planning
- 4 More closed loop retail programs from industry
- 5 Increased resource separation / segregation at disposal point
- 6 Flexible regulatory framework with best practice performance guidelines
- 7 Prioritise product stewardship schemes in regional areas
- 8 More emphasis on resource loss in Municipal kerb side collections
- 9 Other (please specify below)

The top three responses were:

- 1. Mandatory extended producer / retail responsibility**
- 2. Greater reduction in single use items and products through education**
- 3. Prioritise product stewardship schemes in regional areas**

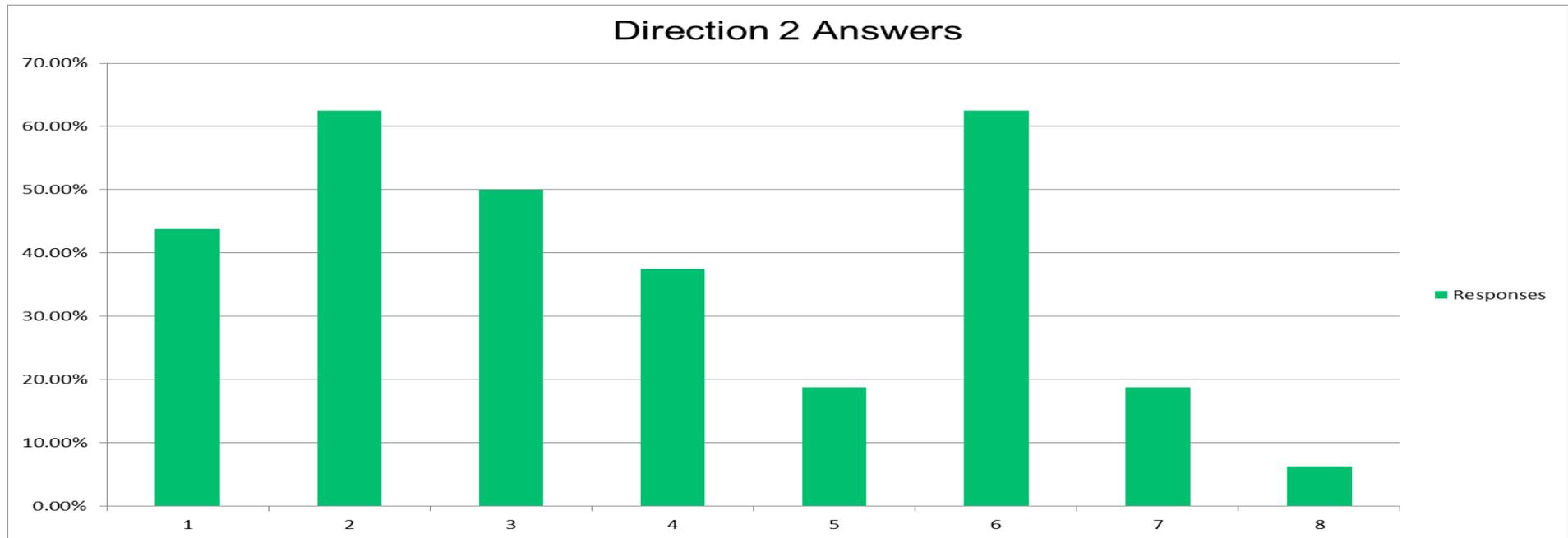
Currently there is virtually zero extended producer responsibility in NSW. This is especially evident in regional NSW as there are few recycling systems available to process the waste that accompanies the products. Many regional centres experience large amounts of cardboard, glass, steel and aluminium being landfilled due to either the Council having limited access to kerb side recycling or being cost prohibitive to take material to an end market.

As materials and products are transported to the retailer, surely waste products produced through the sale of these items could be then back loaded (possibly through levied cost) to an end market by way of producer responsibility. **This would ease the flow of commercial waste to regional landfills, create a circular system and share the responsibility between producer, customer, and Council.**

A greater emphasis on avoiding the creation of waste and in particular single use and complex materials is needed. Waste generators need to take responsibility for their materials they design and should pay the cost of managing these materials. They too like the public, require extensive education and to be provided a framework by the NSW Government in which they are responsible for limiting the use of single use packaging, mandated use of Australian recycled content, and designing out the problematic plastics. **The Government can play a role in consumer education, purchasing power, creating and funding the policy initiatives so we can truly close the loop with Australian recycled materials.**

Stewardship again is rarely seen in regional NSW. One such successful scheme is DrumMuster which sees plastic chemical containers collected by regional depots in NSW. Why couldn't this system be applied to products such as cotton baling wraps, plastic oil containers, other forms of high volume agricultural waste. The stewardship could pay for the transport, reprocessing, and creation of the end markets such as seen in the DruMmuster model.

Q. Direction 2 Improve collection and sorting – what could be done to improve regional diversion of resources from the waste stream? Three most important and relevant future directions from your regional Council’s perspective.



- 1 More education and awareness regarding contamination of kerb side services
- 2 More network-based disposal options for specific or problem wastes
- 3 More incentives for businesses to recycle prior to disposal
- 4 Increased joint regional kerb side procurement opportunities
- 5 Volume based user pays kerb side charges to drive further municipal diversion (larger / smaller waste bins = increased / decreased charges)
- 6 Standardising NSW State wide collection systems for households and businesses
- 7 Setting waste diversion benchmarks for the commercial and building sector
- 8 Other (please specify below)

The top three responses were:

- 1. Standardising NSW State wide collection systems for households and businesses**
- 2. More network based disposal options for specific or problem wastes**
- 3. More incentives for businesses to recycle prior to disposal**

Unfortunately for NSW there are so many waste and recycling combinations, these create confusion among residents as systems can differ vastly from one municipal area to another. Having a common collection system across the NSW would simplify education programs. A State wide approach would also lessen the cost of advertising material with common themes shared across NSW, even nationally. It would also make waste management less confusing for residents / businesses that move from one LGA to another, with same systems mirrored across metro, regional, and rural areas.

Once clarity is established, (especially in the dry recycling stream) then more emphasis can be placed upon the end market. With an identified end market, the resident or consumer will be familiar with recycling as a whole and improve their recycling efforts, as they know where and how the product will be used.

A common phrase used in the Municipal sector by the public is “It all goes to landfill anyway”. With a standardised education template, and systems identifying products from collection to end market, this shift would hopefully see a vast improvement in recycling efforts and raise awareness of the industry and environmental goals.

The Commercial / Industrial and Construction / Demolition sectors also need greater accountability as the major users of larger regional centre landfills. There is little to no diversion taking place in these regional sectors as there are no drivers or incentives to do so. Uniformity is the key to achieving improved waste diversion from landfill and this can be achieved by standardising services; user-pays for volumes of waste generated and having the commercial & building sectors mandated to achieve resource recovery and minimisation of waste to landfill.

This places responsibility on the individuals who generate waste and need to account for its management. Currently Regional Council facilities make up the sole base of waste processing and landfilling. Little to no diversion takes place prior to landfilling. In the Construction sector little compliance is placed on the user / generator at Development Application stage, nor prior to demolition or building. In the Manufacturing sector again, few policies are implemented during the production of goods, and the providing of services prior to waste production then disposal.

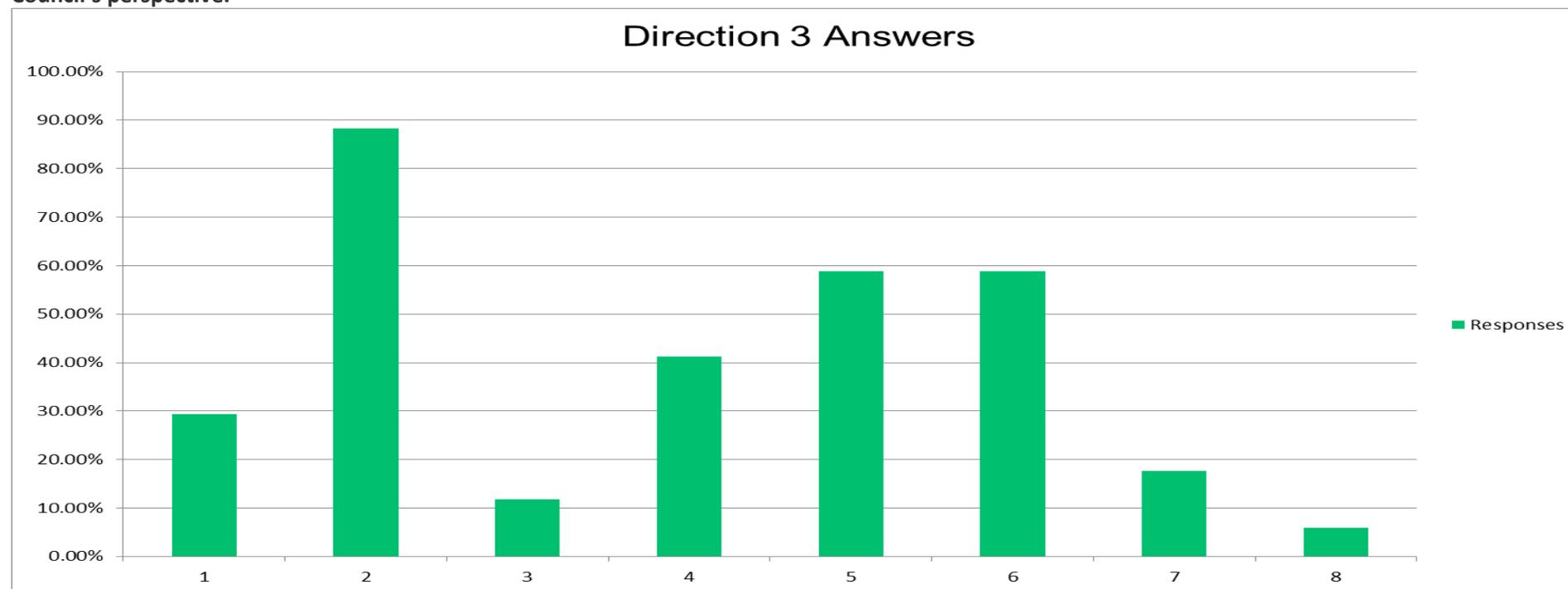
A regional Council having access to a network based disposal centre is a huge benefit and does rectify some the aforementioned points. By accessing networked based disposal options, joint regional kerb side procurement opportunities and/or by standardising state collection systems, it will give regional councils greater access to resources enabling the service to be considered as a financially viable service. Some remote regional Councils do not have kerb side recycling collections. Past investigations have suggested that the many communities are not willing to accept a rate increase to support kerb side recycling. Given the distance to major centres, the cost of removing materials from the waste stream makes recycling of resources difficult.

However, network based solutions can provide consistent and efficient methods for disposing of wastes that could otherwise be easily lost to landfill. Current NetWaste programs for scrap metal, E-waste, oil etc are very effective as they have established stable markets. Dry recycling however has seen a large shift in its value and is still proving a cost prohibitive exercise for more remote Councils to move large amounts of material to the end markets predominately located on the Eastern seaboard. Joint regional procurement provides economies of scale for regional areas and prevents councils from being 'price-takers', but still requires more funding for the remote and far Western based Councils and region.

For businesses to properly recycle prior to disposal there needs to be active incentivised programs through policy supported by the State Government. There are some businesses who do take the time to audit their processes through bin trim and other systems, however without standardised frameworks and incentivised systems many of these processes fall short.

The current, popular skip bin market utilised in construction and demolition projects sees huge amounts of recyclables landfilled. There is simply no incentive for them to use other options otherwise, with no recycling options available. Profit does play a major role where waste management costs are simply "built in" to many projects, without greater research in what really can be recycled and diverted from building sites. The speed in which current NSW housing is erected and the pressure placed on contractors to build and simply move on, does not provide a stable environment to maximise diversion. **An audit of the Construction industry is required to fully realise the potential of resource loss currently experienced in both metro and regional areas.**

Q. Direction 3 Plan for Infrastructure – what infrastructure and services could be built / initiated to reduce regional landfilling of waste and increase recycling? Infrastructure forms a major part of a long term plan of management for their Councils, and their principal landfill. Although not specified in the Issues Paper, it does identify for the identification and delivery of infrastructure. Three most important and relevant future directions from your regional Council’s perspective.



- 1 Regional kerb side recycling services for remote Councils
- 2 Regionally placed MRFs and recycling facilities
- 3 The creation of larger centralised landfills or transfer stations
- 4 Access to funding to build your own Council facilities
- 5 Transport subsidies to ease logistics and travel costs to move resources
- 6 Provide greater incentive for regional waste operators / investors
- 7 Greater use of social enterprise resourcing
- 8 Other (please specify below)

The top three responses were:

- 1. Regionally based MRFs and recycling facilities**
- 2. Transport subsidies to ease logistics and travel costs to move resources**
- 3. Provide greater incentives for regional waste operators and investors**

For many Regional Councils, to decentralise recycling collection and provide the MRF where the material can be sorted would instantly create the network and end markets that are required for regional centres. The current model with MRFs is based solely around volume, hence they are centralised (within Sydney).

Regional LGAs then incur large transport costs to get the recyclables to a centralised MRF which currently has little viable market for the output, thus further increasing regional costs. Small scale decentralised MRFs would create regional jobs. However, the MRF alone is not enough. **There must be local users of the recovered / reprocessed materials.** This is where greater incentives for regional waste operators / investors, or support for social enterprise could fill the gap of what to do with the sorted recycled materials such as Return and Earn.

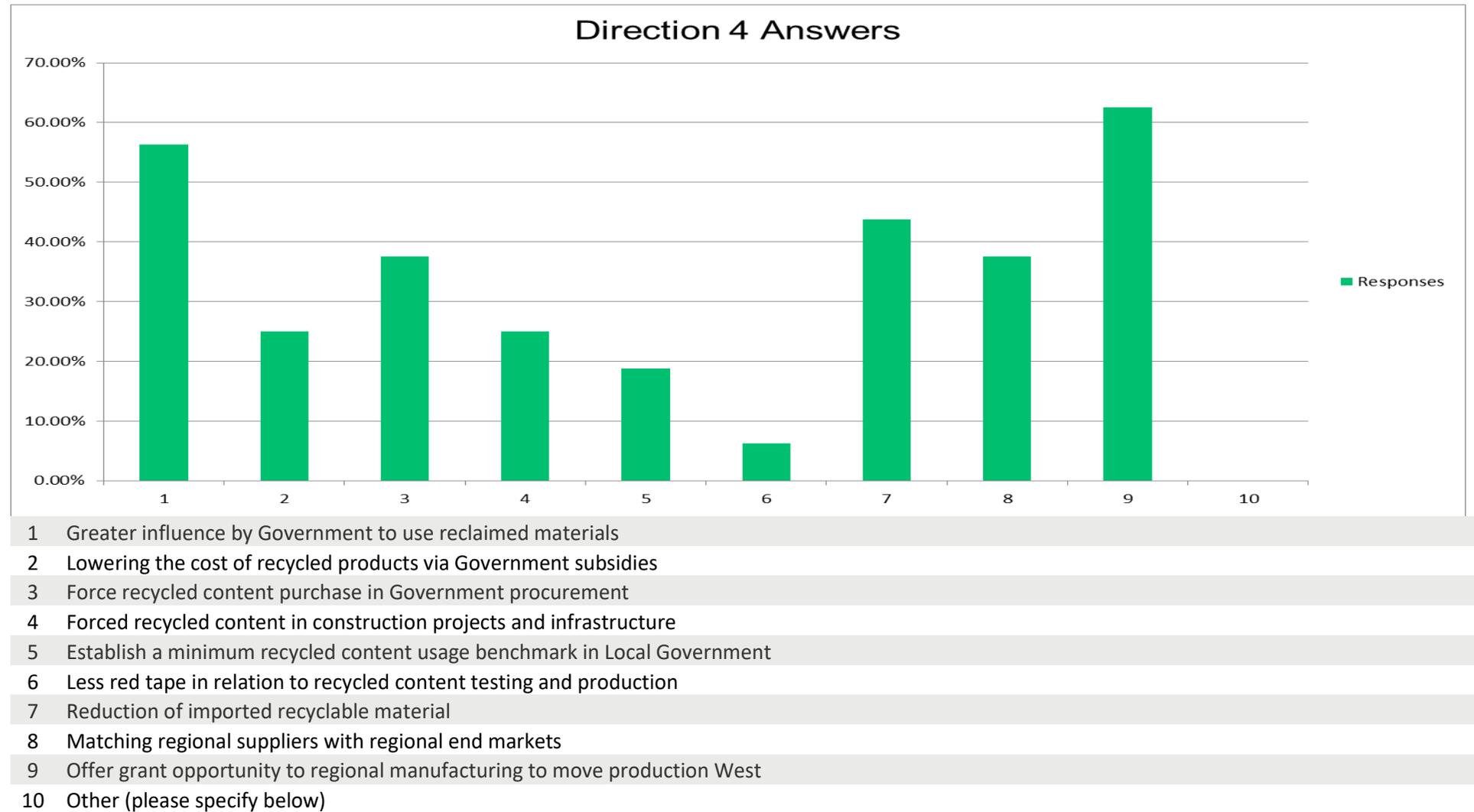
Regional MRFs generally require through-put greater than an individual regional council can provide. A regional MRF has allowed many Councils in the NetWaste region to access kerb side recycling and processing. This in turn provides active diversion from landfill. Regional MRFs allow processing control in regional areas without relying on the big players for recycling, this combined with social enterprise is proven to be a highly effective driver for recycling in regional areas. **This should be promoted and expanded. Funding should be made available for Regional MRFs and recycling facilities.**

Transporting raw collected dry recyclable material hundreds of km away to a MRF located in a metro area, is by far the biggest issue facing regional and remote centres. This can cause several roadblocks in getting services even initiated due to the huge cost. Hence, having infrastructure in regional areas where recycling content can be processed at a viable cost is important. Unfortunately, the recycling industry currently requires large volumes of material in order to make any regional venture profitable.

To support reduced transport logistics, access to funding to build Council owned facilities (this may be in form of a combined facility between a few councils, if need be) is particularly important. Transport cost is a major player in conquering the tyranny of distance faced by many council regions. Regional MRF placement, combined with the shared Council access and larger volumes of material, overcome the cost associated with longer distances - **all Councils could benefit from subsidised transport costs and centralised MRF placement with accompanying end markets.**

If the NSW EPA want regional rationalising of landfills to larger more cost efficient operations then larger incentivised programs are needed to not only improve diversion but create the circular economy mentioned around it. Funding and building regional recycling facilities be it Council or privately owned should be encouraged. By enhancing the local regional economy with employment opportunities, it gives reduction to the chance of metro monopolies fixing charges that we must accept to have our wastes dealt with. Incentives from Government for investors to build these facilities will be crucial. This is especially evident around existing transport hubs further West, with large opportunities to open up logistics via rail with existing infrastructure and transport hubs. Additionally, there is also no requirement for use of recycled products in most manufacturing or civil works. This impacts the growth of remanufacturing industry with some overly onerous EPA regulations limiting the range of products that, in raw resource form, that can be used.

Q. Direction 4 Create end markets – How can end markets be created and accessed by regional councils? Although some of these initiatives may not be undertaken in your council, their introduction may have a beneficial flow on effect to rural NSW. Three most important and relevant future directions from your regional Council’s perspective.



The top three responses were:

- 1. Offer grant opportunity to regional manufacturing to move production West**
- 2. Greater influence by Government to use reclaimed materials**
- 3. Match regional suppliers with regional end markets and reduction of imported recyclable material**

Whilst businesses are happy to secure grants and other incentives, it is pointless unless long term sustainable legislation measures are taken to drive change. Manufacturing in NSW needs a defined and mandated framework in order to secure grants that provide minimal up-front cost and promote investment, not to subsidise an otherwise uneconomic project in the long-term. The recycling industry should not rely on ongoing subsidies for viability, but reduced capital cost (via funding) savings. The potential certainly exists for greater usage of recycled products, and to create new industries and markets in the NetWaste regional area. Recycling businesses should be interlinked to manufacturing at a sub-regional level. **The Government should take the lead and set an example by procuring the recycled products and encourage the community and business to follow.**

State Government needs to facilitate the development of regional businesses that can utilise recyclable materials in the manufacturing of products to be used locally. Specifying the use of recycled content in construction projects and infrastructure will help to develop a market niche that switched on manufacturers could then fill. While many production companies focus on virgin, raw materials (for an excuse to manufacture high quality products), it is time to establish minimum requirements to use reclaimed materials in lieu of raw materials for the manufacturing of new products. All points have their merit. **Government can force all these options via legislation in order to make recycling more cost effective and utilised across the board.**

If the import of recyclable materials is reduced and controlled, there will be a natural increase in demand of locally available recyclable materials. This would increase the viability of the whole process. Tariffs should also be considered as Australia pays dearly in the export market, so too should importers of recycled material which could otherwise be sourced locally.

Until such time where policy is used to drive local procurement, manufacturing and recycled material use by Regional Councils still face isolated distance issues. Much greater Government influences are essential in future waste strategies. **The promotion and assistance of using recycled products ensures waste production is targeted at the front end, helping to reduce the amount of non-recyclable waste.**

Directions: Regional Funding

Overall NetWaste Councils are informed of what options are available regarding funding and assistance for waste projects. However, through the survey responses many Councils felt that the process provided by the EPA was too overwhelming, and that it was so onerous that it did not allow enough time to take in the additional project through normal work hours. The framework that is provided through both the EPA and NSW Environmental Trust should be consolidated into one entity ensuring that both Council and EPA officers are responsible for the support and success of the project, funding acquisition, reporting, accounting, and reconciliation of the grant funding.

The amount of information required for some types of grants require hours of data collation. Smaller Councils may need to use a consultant (at their cost) to complete an application that may not get funded. The staff resources available to project manage a successful grant application may also be lacking at a Regional Council level. Reporting requirements around the grant may also be very time consuming. Grant selection is quite restrictive on who can apply for it. The interested Council may be quite receptive to the idea but may not fit the selection criteria for grant eligibility, the grant timing, or the available funds may have expired.

Any projects of operational nature such as on a waste facility site tend to be not funded, as its considered core business of Local Government and therefore not eligible. This makes waste asset management incredibly challenging without the support of a large accompanying budget, or access to funding. Overall EPA / NetWaste grant funding for numerous waste projects has been beneficial. The grants do, however, require significant administration and this can also act as a large deterrent for many Councils. Creating greater streamlined access, and increased time for core operational waste management (including plant and assets) funding would improve many sites, especially smaller Councils looking to upgrade and improve un-licensed site environmental management.

Directions: Regional Success

The access to last WLRM funding from State Government was critical, and many Councils were privileged by the grant funding opportunities to implement some very important projects. These have had a lasting effect on the region's waste diversion and resource management. Projects such as food and organics kerb side collection, as well as the establishment of Community Recycling Centres all assist in the regional success of waste diversion, work health and safety, and preventing resource loss.

NetWaste's ability to provide additional educational support has been critical, especially for many smaller Councils. Development of innovative community focussed programs, and targeted resources aimed at reducing contamination, and raising awareness about waste management is central to changing behaviours. Additionally, the ability for NetWaste to extend its services via an Environmental Learning Advisor is key to the region's educational needs. The advisor has developed many educational targeted resource kits for smaller Councils and Communities. These include local schools, committees, associations, non for profit, and remote Indigenous Communities. Topics such recycling, sustainability, food care, litter management, and asbestos awareness have all been delivered across the 26 member Councils. A regional focus from NetWaste provides an opportunity for many of our Councils to be involved in EPA programs such as Love Food Hate Waste and Food Rescue.

Smaller councils do not have the funds available to implement major improvements to un-licensed sites or upgrade their environmental controls (such as a very costly ground water monitoring bore). As the EPA becomes more stringent around enforcement and requires improvements at sites, resources need to be available to make these changes to not only cover specific EPA environmental issues, but generalised fields such as remote dump sites, legacy waste clean ups, and upgrades to landfill site hardware.

Funding is critical for many waste projects as it is difficult to use pricing to fund projects, as any increase in waste charges can increase illegal dumping. This is a very real problem in regional NSW. Many Councils do not the have the funds or access to a RID squad, or the time to undertake such compliance issues which include dumping spreading from the levied metro area of Sydney.

Whilst regional Councils remain resilient through these challenges there still is a major disconnect from the EPA to regional NSW. This situation has seen some improvement however there is still no actual identified Regional Development Officer role from the EPA, that provides a direct conduit between the EPA and the regional waste groups. Government programs are covered as a whole, but there is still no direct link between regional and metro, which is required to bridge the gap and formalise the links from Local Government to State.

Directions: NetWaste

From survey information regarding NetWaste assisting Council involvement, and how it links to the four directions, most Councils generally want NetWaste in conjunction with the EPA to assist in three ways:

- 1. Investigate avenues of funding with the EPA (putting Councils in touch with the right people and contacts)**
- 2. Inform Councils of what grants are available and how they may suit their particular needs (match the right grant with the right project)**
- 3. Provide kickstart funding to initiate a project in conjunction with larger EPA funding opportunities**

For ongoing assistance, it is imperative that NetWaste itself secures more funding. The success of NetWaste is that it is truly collaborative in every sense of the word. It has more than double the Councils of any other Regional Waste Group and covers a 1/3 of NSW in area, so relies very heavily on information sharing, regional procurement, and regional action plans.

NetWaste would also welcome the addition of a dedicated EPA liaison / development officer for the region. This would assist the process of funding projects and give Councils the confidence to actively take ownership of the opportunities available. It will also provide a conduit for communication between the groups of Councils, voluntary waste groups, and the EPA. The majority of interactions are for the majority, faceless. This would create more trust between the Councils and EPA, so it is not seen solely as a compliance and regulating body. Many initiatives are being formulated by smaller Councils however the process involved can be somewhat overwhelming and onerous. By creating a more humanised link, the NetWaste region would benefit greatly and allow more involvement, funding, and environmental stability from the Councils who require this help the most.

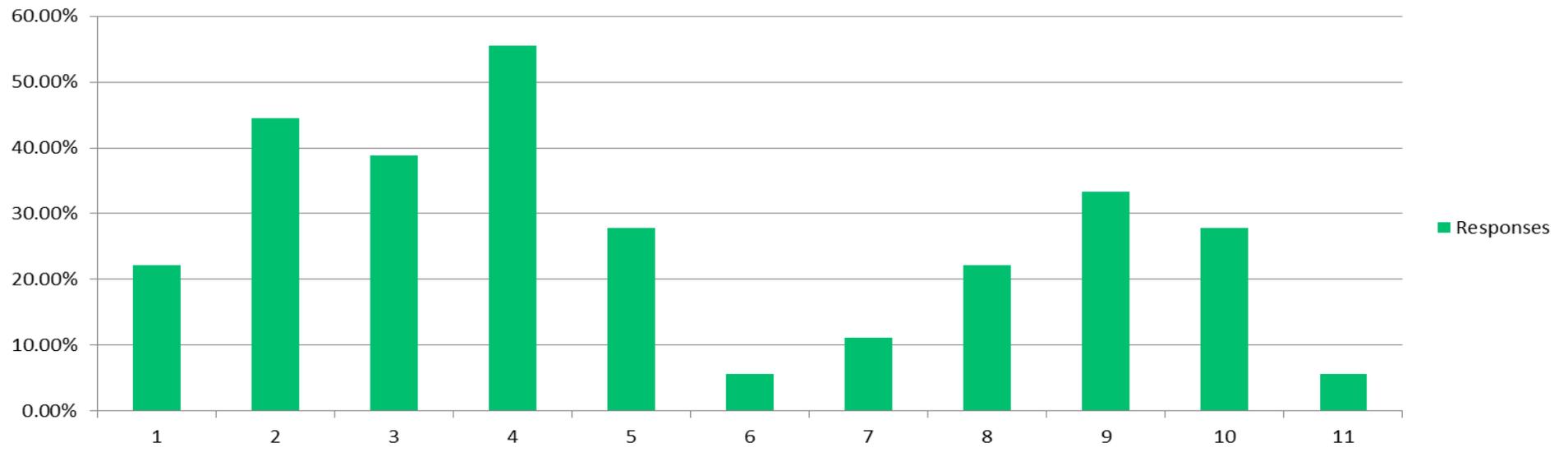
As stated previously the EPA does not have a totally committed regional resource for the waste groups. With regional EPA offices located throughout NSW, a permanent regional liaison based in the Central West would greatly assist the NetWaste forum meetings and highlight the importance of waste management both at Local and State levels. NetWaste would ask the EPA to please consider an expression of interest to develop such a position. Ideally this could coincide with the release of the new 20 Year Waste Strategy, with NetWaste updating its own action Regional Waste Strategy to reflect the new State directions.

Many projects were developed in collaboration with local communities to highlight priorities and actions for each region. The action plans encourage groups of councils to develop regional waste avoidance and resource recovery strategies. NetWaste is hopeful that the new 20 Year Strategy will take into consideration the challenges faced by our region, and the good work that has been accomplished by the Councils.

Directions: Councils

In order to keep improving and sustain the NetWaste region and its waste and recycling resourcing, it is important to identify the regional key environmental challenges for the future. The following information provides an inside view of what Councils would view as an ideal waste / recycling related / environmental challenge that could be rectified if appropriate funding were available at your Council?

What is your ideal waste / recycling related / environmental challenge that could be rectified if appropriate funding was available at your Council? Please select the (3) three most important



- 1 Reduce contamination of the local environment (legacy waste) from an old (contaminated/toxics/asbestos) landfill site or process via clean ups
- 2 Address illegal dumping with compliance or regulatory work
- 3 Increase educational resourcing
- 4 Establish regional processing hubs
- 5 Introduce a kerb side recycling service
- 6 Introduce bulky waste collections
- 7 Conduct landfill / kerb side waste audits and reviews
- 8 Improve landfill management (main site)
- 9 Improve remote (rural site) management / maintenance
- 10 Engage contractors to assist in the chosen project or more staff
- 11 Other (please specify below)

The top three responses were:

- 1. Establish regional processing hubs**
- 2. Address illegal dumping with compliance or regulatory work**
- 3. Increase educational resourcing**

As mentioned before, regional processing hubs can make many projects viable (eliminating / reducing significant transport costs) and encourage improved resource recovery. Knowing what goes where is important to decide what should be the focus area (to identify the opportunities) of improvement. The establishment of regional processing hubs that include sorting / processing of recyclables with end users, encourage small industrial hubs with raw supply from the MRF and manufacturing next door. With the introduction of processing hubs, comes collection, mobile plant, logistics, and other support business - all benefit from its introduction to a regional area.

Illegal dumping compliance has always been a very resource heavy project for Councils, as it not only takes up vast hours of investigation, but normally the council wears the clean up cost. Even a small amount of successful compliance work sends a strong message. The most common reason for compliance projects not being completed, or lack of result is that staff resourcing is so incredibly high. Staff require specific training and legal experience to undertake this line of work. There has been increased successes through diligence by NetWaste councils in the field of compliance using CCTV, however this is still very resource heavy and does not have the added benefit of specialised staff such as RID Squads that are able to encompass the entirety of illegal dumping and successfully prosecute offenders.

Other developments in waste can be lost in regional areas and this should be rectified. Developments include increased environmental controls required for landfilling, true cost of landfilling, and the benefits of waste avoidance and recycling. In many areas the waste stream is seen simply as something you place in the ground to get it out of sight. There is a general lack of knowledge of the technical aspects (environmental / economic) of waste management and the need to have suitably qualified and experienced resources to manage waste.

Getting the EPA (and to some extent NetWaste) to educate councils on importance of waste management and the need to allocate sufficient resources is highly important. Education will improve the management of waste facilities (prevent environment incidents) and provide for better overall waste management including waste avoidance, efficiency, and recycling options.

The perception and attitude of waste can change through education, and public awareness is very important to increase recycling. Unfortunately, it is a very short process (sometimes project to project) and needs continued effort. The ongoing waste education strategies that are required by larger councils are mostly produced in house. Smaller Councils on the other hand require external assistance which can lead to higher costs. Funding opportunities would help these councils cater for this requirement more frequently and appropriately.

Directions: Waste Levy

The waste levy is not applicable to the Councils within the NetWaste region. Many councils do not have the ability to accurately and fully capture the volumes of waste to apply a waste levy. Administration, plus the addition of weighbridges, reporting, software, and additional staff are simply not viable options for most of the NetWaste Councils. There would be a significant additional cost in terms of gate fees at the landfills.

This would be hugely unpopular with residents and businesses, with significant backlash for Councils. Illegal dumping is already a major issue for regional Councils without the introduction of a new State driven tax. A waste levy places additional demands on Councils who are already struggling to provide services, and complete projects. The administration system required to collect such levies is highly extensive and would greatly outweigh the actual benefits that a possible levy could deliver.

A levy could encourage more diversion from landfill and increase some recycling, however, at what cost to Regional Councils? The total volumes for the region simply do not equate to warranting a waste levy to regional NSW. Any potential savings would be instantaneously lost to illegal dumping clean ups which would increase substantially. The waste volumes generated do not warrant the cost of implementing a levy in the NetWaste region.

With much of the collected metro levy sitting in consolidated revenue, the investment back into the industry, true resource recovery, and State targeted waste diversion, the actual purpose of the levy cannot be fully achieved. The funds already captured from the levy areas should be put into incentivising investors to build reprocessing hubs in the NetWaste region. This would tie into the circular economy strategy, without placing increased financial burdens on Councils, and value adding to the local economy.

State Government should additionally apply the levy to the producers of products and make them accountable for their waste streams through product stewardship / EPR schemes. We are all responsible for our waste. The key is to provide the options and incentives to move these end products away from landfill and into the resource market where they belong. It is not the case for Government to simply leave all recycling to Regional Councils. It is too greater task for them to manage every aspect of the three prevalent waste streams and their corresponding impact to local landfills.

Netwaste was established to provide regional resources and projects to make resource recovery and recycling viable in the region. This was due to the increased distance from the collection area to the processing facilities, to the end market, that make many regional projects highly cost prohibitive. **A waste levy will simply create increased illegal dumping, strain Council resources, and not provide any substantial meaningful improvement to the council or the landfills they operate.**

Directions: Waste to Energy

This topic has raised much discussion in the NetWaste region with collation of landfill volume data already being recorded by State Government Regional Growth Development Corporation. This could very well be the answer for many more remote councils. The opportunity to divert waste from landfill to a waste to energy plant, could be welcomed by many Councils. Much would be depending on the cost benefit of the technology and environmental outcomes versus cost of local landfill operations currently in place.

This consideration would have to take whole of life costings including the replacement cost of building a new landfill. Regional employment will also be a consideration, however, could move both ways with gains and losses in the same industry with waste moved to a third party outside the municipality. The ability or willingness to pay for the service would also depend on the extent of the gate fee, transport costs, and resources required, and how this relates or compares to current waste practices in the region.

As solid waste landfill management appears to be declining overseas, waste to energy will have a future in Australia, and especially NSW. Such a facility will need to be strategically located. Where certain areas do not have the option of integrated dry recycling capture, Councils would be happy to use those products as waste to energy. This is especially relevant for the far Western Councils. Seeing as waste still requires some processing regardless of collection methods, and if the alternative is competitive with landfilling gate fees then the region could see extended future benefits.

Conclusion

It is essential that in the forming of the 20 Year Waste Strategy, State Government recognise the role of NetWaste and the waste and recycling services that regional Councils deliver daily. The outcomes of this submission and the NetWaste survey will hopefully raise awareness to the State Government on the real issues surrounding regional NSW, and ascertain what future waste directions our region and State will take.

NetWaste like other Regional Waste Groups provide the collaboration between DPIE and Local Government to administer the essential service of waste management. The current waste and recycling services offered in the metro region simply cannot be fully replicated without adequate funding and investment. NetWaste will look to bolster these existing regional Council arrangements through the new strategy, and in turn support all Regional Waste Group operations.

Submission

This submission on the issues paper has been lodged electronically to the Department of Planning, Industry and Environment via email to 20YWS@dpi.e.nsw.gov.au

Kind regards,



Jessica McDonald