LOCAL GOVERNMENT NSW

Draft Submission on the Discussion Paper – *Updating the 2009 National Waste Policy: Less waste, more resources*

October 2018

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Table of contents

Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing general purpose councils and related entities. LGNSW facilitates the development of an effective community based system of local government in the State.

LGNSW welcomes the opportunity to comment on the Discussion Paper *Updating the 2009 National Waste Policy: Less waste, more resources*.

This is a draft submission awaiting review by LGNSW's Board. Any amendments will be forwarded in due course.

Purpose

The Australian Department of Environment and Energy is seeking input on priority issues to be considered in future Australian waste management and resource recovery. The Department is undertaking updates to the *2009 National Waste Policy: Less waste, more resources* and has sought feedback by 5 October on the Discussion Paper that was released on 7 September 2018. The April meeting of environment ministers agreed to update the policy and incorporate circular economy principles. Feedback will inform updates to the 2009 National Waste Policy for consideration by environment ministers later this year.

Background

The Council of Australian Governments (COAG) Standing Committee on Environment and Water developed a comprehensive National Waste Policy in 2009 that provided a national framework for improving Australian waste management and resource recovery. There has been little progress or reporting on outcomes from the policy to date. This has left Australia's recycling industry in a vulnerable position to manage the volatility in global markets triggered by China's National Sword policy.

During the life of the 2009 National Waste Policy waste generation rates per capita have declined and recovery rates have improved, however our population and consumption choices continue to grow. Coupled with China's decision to restrict imports of recycled materials and changing international markets there is a need to develop a resilient waste management and resource recovery sector and improve domestic markets for recyclates (secondary materials produced from recycling). These new challenges require an update to the 2009 National Waste Policy.

Australia is behind other countries, particularly in the European Union, which have established policies and made investments in infrastructure and technology to support circular economies to ensure secondary materials are used onshore, creating jobs and wealth.

The Discussion Paper signals a shift in policy position, transitioning away from a linear economy to a circular economy that retains the value of materials in the economy for as long as possible.

Response

LGNSW welcomes the opportunity to comment on the Discussion Paper – *Updating the 2009 National Waste Policy: Less waste, more resources*. LGNSW has long advocated for the recognition of the waste and resource recovery sector as a priority sector, essential service and significant contributor to the Australian economy.

Overarching comments

The tight time frame for updating the National Waste Policy for sign off at the meeting of environment ministers in November in 2018 is likely to lead to a policy that has not been fully developed or endorsed by all levels of government. The timeframe is insufficient to allow the release of the actual draft policy for comment and for endorsement by local government, which is likely to be responsible for implementing actions.

Updating the existing National Waste Policy, including circular economy thinking, is a positive step towards preserving our prosperity. However the proposed update is still primarily focussed at end of life and in part on consumption, without reflecting all facets of a circular economy. Consideration could be given to including in the Policy a pathway for the development of a circular economy policy for Australia.

The discussion paper outlines proposed principles, targets, strategies and milestones that at times contain actions without identifying responsible parties for ownership or implementation. The strategies and milestones are not always outcome focussed, often mixing actions and activities with outcomes and this weakens the clarity of the policy direction. There is also a lack of information on how the policy will be monitored, reviewed, reported, evaluated and updated.

It is noted that this will be a policy that incorporates circular economy thinking and is most appropriately signed off by 'whole of government' as it impacts on Australia's triple bottom line and implementation will require action from a number of agencies at all levels of government.

If the National Waste Policy is to reflect circular economy thinking, recognition of the need to minimise the reliance on virgin material should be included as a first principle, rather than starting with avoiding waste.

Given that many recyclables (eg compost) have low commodity values that are undercut by transport and logistics costs, consideration should be given to including strategies that encourage the development of localised circular economies close to the source material.

The discussion paper does not list organisations that provided input. It is considered important that there is sufficient representation from the broader business community (for example Australian Business Group and Manufacturing Australia). The size of business that becomes a voluntary signatory to this policy and its action plans also needs consideration as there is opportunity to target, in the first instance, businesses over a certain size/turnover/type or that import goods.

Reflecting circular economy thinking needs to recognise the opportunity and economic incentives for jobs including from the social sector, as well as regional economic development and modernisation of the industry. Consideration could be given to the use of economic instruments including using: global trade and compliance mechanisms for imports, relief from GST for products that remain in the economy eg through repair and reuse, and compliance with Australian Standards to leverage producers to create better-quality goods, and to reduce product lines that are single-use or made from virgin material.

Examples of economic instruments for consideration include:

- tax incentives (such as VAT reductions given in many countries) for enterprise/businesses that produce recycled products, sell goods that are repaired/reused/repurposed. See: http://www.rreuse.org/wp-content/uploads/RREUSE-position-on-VAT-2017-Final-website_1.pdf .
- tax relief (eg GST) for community purchase of certified recycled or refurbished goods.

- increased cost of consumer goods with packaging made from non-recycled plastic (eg France from 2019 will increase the cost of products sold in unrecyclable plastic packaging by 10%)
- enabling unique infrastructure opportunities for re-sale of recycled / repurposed items, to inspire or accommodate more 'takers, buyers' of second-hand goods. (eg ReTuna Recycling Mall in Sweden)
- supporting job growth by 'waste to wages' targets (eg Belgium identifying job growth as a key indicator for a thriving waste industry, with real actions towards social inclusion).

The discussion paper should consider outlining how this policy enables/overlaps/interacts with existing national policies, strategies and programs, such as the National Food Waste Strategy (targets are included but not identified), National Infrastructure Strategy and the Clean Energy Finance Corporation to stimulate the market to invest in low carbon initiatives.

Whilst the discussion paper recognises that transitioning to the circular economy involves strengthening product stewardship and sustainable procurement as well as investments in infrastructure, it does not adequately recognise the regulatory and policy changes needed to influence and change behaviour that should underpin the identified principles, targets and milestones. A strong national education and awareness raising theme should underpin all principles and targets, with consideration given to campaigns that increase the public's knowledge of and support for the circular economy.

Consideration should also be given to the development of a national knowledge/innovation hub (similar to Holland Circular Hotspot) for the circular economy including development of local circular economy case studies and international best practice as well as useful tools for organisations that outlines steps that can be taken on their journey towards the circular economy. This could also include case studies on smart technologies (eg bin sensors that allow 'bin sharing' for Commercial and Industrial (C&I) and Municipal Solid Waste (MSW), Food and Garden Organics (FOGO) vacuum systems and solar and geo-targeting applications)

Figure 3: Circular Economy could be better represented by the circular economy graphic from the Ellen McArthur Foundation. The discussion on the circular economy could better reflect the dual circular flows as represented by the Ellen McArthur Foundation.

There is a need to define words used (eg resource recovery or terms used in targets such as "problematic" and "unnecessary"). It is likely that different state legislation include differing definitions (eg recycling may or may not be included in the definition of waste).

The discussion, strategies and milestones of *Principle 2: Improve resource recovery* should consider improving the 'quality' of both the inputs to processing (eg reducing contamination of kerbside recycling) and the outputs of processing (eg recyclate). Higher quality will enable a wider range of markets/uses for recyclate and enable remanufacture of better quality products. It is also important to break down resource recovery into its component parts when setting targets so that recycling can be prioritised over recovery of energy from waste in line with the waste hierarchy.

Consideration should be given to strengthening strategies and milestones for high quality reuse and repair to extend product life.

The Policy should consider strengthening and mandating extended producer responsibility for products with high environmental impact. As the recommendations from the recent review of the Product Stewardship Act have not been released it is not possible to comment on which of these should be included in this updated policy.

The Policy should also recognise the waste and resource recovery sector as an enabling sector necessary for the efficient and effective operation of many other sectors of the economy (similar to the energy sector) and that the value of this sector is likely to increase rapidly in the transition to the circular economy until it becomes predominately integrated into all sector supply and demand chains in a circular economy.

Feedback to questions posed in the Discussion Paper and specific edits to the principles, strategies and actions have been collated in the attached table. Revisions are underlined and in strikethrough text, new text is in green.

Conclusion

LGNSW welcomes the Australian Government's leadership in updating the National Waste Policy, including circular economy thinking, and we look forward to the opportunity to input to the draft National Waste Strategy when it is released.

Any financial flow-on effects to NSW local government in implementing this Policy should be funded by hypothecation of the NSW Waste Levy to councils for the purpose for which it was collected - encouraging waste avoidance, recycling and the safe environmental disposal of waste.

For further information, please contact Liz Quinlan, Senior Policy Officer – Waste, on Liz.Quinlan@lgnsw.org.au or 02 9242 4095.

Feedback on targets

Principles	**Target**	**Do you agree? Ranking: 1 yes-5 no**	**Is there a different Target that should be included**	**Comments**
NEW - Minimise reliance on virgin materials *(should be first principal)*	*By 2030 achieve the sustainable management and efficient use of natural resources (part of UN SDG Goal 12); OR* *By 2030 achieve sustainable materials management reducing pressure on natural resources*		See new target	A principle and target that reflects reducing dependence on virgin material/natural resources, particularly for resources with high environmental pressure or limited supply, is needed to reflect circular economy thinking. Alternatively, a pathway to achieve this is needed.
P1: Avoid Waste (define)	*Reduce total waste generated in Australia per capita by 10% by 2030*	1	Have both a generation target AND a target to ban untreated MSW, C&I and C&D from landfill	How waste generation target is measured for avoidance rather than other conditions (eg light weighting, economic conditions) needs consideration.
P2: Improve Resource Recovery *(define)*	*80% average recovery rate from all resource-recovery streams, following the waste hierarchy by 2030*	2	Target should be separated into individual targets for MSW, C&I, C&D as all have different baselines and management systems. Separate targets should also be given for recycling and recovering energy from waste to ensure that recycling is prioritised over energy from waste.	This target needs to be closely tied to P3 as need strong markets for system to work A definition of resource recovery is required – does this include recycling and recovering energy from waste?

P3: Increase use of recycled material and build demand and markets for recycled products	*30% average recycled content across all goods and infrastructure procurement by 2030*	2	Should Australian vs imported recycled content be specified?	Most common recycled products (eg recycled paper) have imported recycled content and do not support markets for local resource recovery.
P4: Better manage material flows to benefit human health, the environment and economy	*a) Phase out problematic and unnecessary plastics by 2030*	3	Phase out hard to recycle products by 2030	Problematic needs to be defined and 'unnecessary' is unnecessary! Should be broadened to all hard to recycle or 'problematic' materials (with definitions). If it is to be applied just to plastics, then target should be by 2025
	b) Halve the volume of organic waste sent to landfill by 2030	3	80% reduction in the volume of organic waste sent to landfill by 2030	Considerable progress has been made already in NSW so a harder target is required to drive the development of alternatives to eg pallets and treated timbers
*P5: Improve information to support innovation, guide investment and enable informed consumer decisio**ns***	*A national target for fit-for-purpose and timely data to be available for individuals, businesses and governments to make informed decisions*	5	A fit for purpose national data framework is endorsed by 2019 and in use to make informed decisions by 2020 with the goal of real time data.	Apart from the biennial National Waste Report there is little knowledge at local government level regarding national WARR data frameworks
NEW – People have the relevant information, awareness and skills to make sustainable choices	*NEW – Consumer education strategies in place across Australia about sustainable consumption choices, waste avoidance and reduction, improved recycling and resource recovery by 2021.*		See new target	

Feedback on strategies

Principle 1: Avoid Waste

Strategy	***Do you agree?*** **Ranking: 1 yes, 5 no**	***If not, why not?***	**Interim Milestones** **(revisions in red, new milestones in green)**	***Do you agree?*** **Ranking: 1 yes, 5 no**	***If not, why not?***
Strategy 1: Waste avoidance - *Deliver actions that help the community and businesses avoid and minimise waste, including through design, reuse, repair, and sharing of products and services*	3	Revised wording: *Deliver actions that help governments, community and businesses avoid and minimise waste, including through consumption choices, design, reuse, repair, and sharing of products and services.*	*Businesses across the food supply and consumption chain become signatories to the voluntary commitment program to reduce food waste by 2019*	1	Funding for oversight body for voluntary commitment program already committed by government. Public reporting of progress against commitment is required.
			Total waste generated in Australia is reduced by 5 per cent per capita by 2025	1	
			Food waste is halved by 2030, in line with the National Food Waste Strategy	1	Existing commitment – National Waste Strategy should clearly identify strategies/milestones already agreed to as part of the National Food Waste Strategy
Strategy 2: Design - *Design systems and products to avoid waste, conserve resources and maximise the value of all materials used at every stage of a product's life*	3	Revised wording: *Design materials, products and systems to avoid waste, conserve resources and maximise the value of all resources~~s~~ used at every stage of a product's life*	*Government & b~~B~~usinesses implement actions to avoid waste and support eco-design of products that increases a product's lifecycle (including avoidance of toxic/hazardous materials, disassembly, ~~and~~ repair and future life) by 2020.*	2	Governments have a role in designing the systems and setting the standards for design. What business incentives/regulations will achieve this?
			NEW – Australian Government places obligations on importers of products to provide information on their product's environmental risk and end of		

			life disposal options that are third party verified and activate appropriate compliance mechanisms for poor performing products.		
Strategy 3: Knowledge sharing, education and behaviour change - *Apply waste hierarchy and circular economy principles to design, implement coordinated initiatives that address the needs of governments, businesses and individuals, and incentivise the redesign, reuse, repair, resource recovery, recycling and remanufacturing of products*	2	Too long and complex for a strategy	*Infrastructure, ~~and~~ information sharing, regulation where necessary and incentives are ~~is~~ in place to support ~~-~~redesign, reuse, repair, resource recovery, recycling and remanufacture of products ~~reuse, repair and sharing of products~~ by 2025*		
			Targeted behaviour change ~~consumer education~~ strategies in place across Australia with evidenced-based messaging about sustainable consumer choices , ~~-~~avoiding and reducing waste, improved recycling and resource recovery ~~waste reduction strategies~~ by 2021		

Principle 2: Improve Resource Recovery

Strategy	***Do you agree?* Ranking: 1 yes, 5 no**	***If not, why not?***	**Interim Milestones** **(revisions in red, new milestones in green)**	***Do you agree?* Ranking: 1 yes, 5 no**	***If not, why not?***
Strategy 4: Product Stewardship - *Develop and implement partnerships across government and business to ensure ownership and responsibility for action to minimise the negative environmental impacts from products and materials, ensure the minimisation of waste and maximise reuse, repair and recycling of products and materials throughout their life cycle*	2	See rewording	*Framework that prioritises mandatory over voluntary schemes for national action on products, through product stewardship, endorsed and used by all governments by 2019*	2	There is need for more mandatory schemes particularly where voluntary schemes are not achieving desired outcomes.
			Current product stewardship schemes reviewed in line with prioritisation framework and agreed by 2020	1	
			Findings and recommendations of the Product Stewardship Act review are implemented by 2020.	3	Findings and recommendations have not been released so need to see before agreeing
			National end-of-life management system for photovoltaic panels and batteries designed by 2020	3	COMBINE - National end-of-life management system for photovoltaic panels and batteries designed by 2020 and implemented by 2025.
			End-of-life management process for photovoltaic panels and batteries in place by 2025, or earlier	3	
			100 per cent of packaging designed to be reusable, recyclable or compostable in Australia by 2025	2	This target is nearly met as most packaging is reusable, recyclable or compostable somewhere in the world – it assumes export. Milestone needs to be broken down into categories.

			NEW – A Commissioner for Product Stewardship is in place by 2020.		
Strategy 5: A common approach - *Australian, State and Territory Governments i~~I~~mplement a common approach to~~wards~~ policy and regulation of waste and resource recovery, particularly in relation to national opportunities to support development of markets for recycling*	2	See rewording	*Action plans on policy priorities to achieve a common approach agreed by 2019. This will include common approaches towards transportation of waste and recycling (particularly to support market development), national energy from waste policies~~responses~~ (consistent with the waste hierarchy), landfill levies, and minimisation of regulatory inconsistency*	3	
			National classifications and definitions agreed for data and reporting on wastes and recycling by 2020	1	
			Priorities for ~~common~~ national standards and specifications agreed by 2020		Unclear in what area national standards are required - some potential examples would be good. Eg Procurement Specifications etc
			Consistent approach ~~Common approach~~ towards classifications and definitions for data and reporting on wastes and recycling across Australia implemented by 2025.	2	See rewording
Strategy 6: Improving Access - *I~~dentify and~~ improve ~~the ability of~~ regional, remote and Indigenous communities ~~to~~ access to waste and*	2	See rewording	*Programs implemented~~established~~ by 2020, in collaboration with regional, remote and Indigenous communities, to ~~that~~ increase access to resource recovery and waste management infrastructure*	2	See rewording

resource recovery infrastructure at an appropriate scale and services and improve their ability to participate in the local circular economy *~~, influence and participate in a circular economy~~*			*and services, and associated education and training~~, by 2020~~*		
			Access to resource recovery and waste management infrastructure for regional, remote and Indigenous communities ~~increased~~improved ~~-~~in every state and territory by 2025.	2	See rewording
			New milestone: *Regional and local circular economy resource recovery pilots operational by 2020.*		See rewording
Strategy 7: Increasing industry capacity *- Identify and address opportunities across municipal solid waste, commercial and industrial waste, and construction and demolition waste streams for improved recycling and resource and energy recovery, to deliver ongoing improvements in diversion from landfill. and support the transition to a circular economy ~~implementation of the waste hierarchy~~*	2	See rewording	*Identify skills and competencies in the waste management and recycling sectors and invest in skills development by 2019*	2	See rewording
			Identify ~~Consider~~ opportunities to improve planning for waste infrastructure by 2019	2	See rewording
			Undertake a national inventory of waste and resource recovery infrastructure and capacity by 2019 and e~~E~~stablish or improve recycling and resource recovery infrastructure where required by 2025~~0~~ including attracting new players.	2	See rewording
			Report on capacity of the resource recovery and recycling sector to meet targets by 2020	3	What targets are we referring to? Only target is *80% average recovery rate from all resource-recovery streams, following the waste hierarchy by 2030.* It is unclear how

					data will be made available by industry.
			Investigate~~Consider~~ the development of ~~voluntary~~ standards for material recovery facilities and the construction and demolition sector by 2020	2	See rewording It may be appropriate for minimum standards for facilities to be regulated.
			National Packaging Targets, focused on recycling rates, achieved by the Australian Packaging Covenant Organisation by 2025	2	
NEW – Support the transition to the circular economy			*NEW - Develop a national strategy to support investment in R&D, innovation and advanced technologies to increase resource recovery and remanufacture as well as market development for products with recycled content by 2020 with implementation by 2025*		

Principle 3: Increase use of recycled material and build demand and markets for recycled products

Strategy	***Do you agree?*** **Ranking: 1 yes, 5 no**	***If not, why not?***	**Interim Milestones** **(revisions in red, new milestones in green)**	***Do you agree?*** **Ranking: 1 yes, 5 no**	***If not, why not?***
Strategy 8: Sustainable procurement by governments - *All levels of ~~Australian~~ governments~~s~~ create and promote demand for recycled materials and products containing recycled content* *~~consider environmental issues in their approach to goods and infrastructure procurement and promote demand for recycled materials and products containing recycled content~~*	3		*All Australian governments ~~to~~ adopt, implement and report on their sustainable procurement policies or guidance with measurable, publicly reported targets for use of Australian and imported recycled content by 2020*	2	Opportunity to build in recycled content reporting in govt annual report
			Develop a National Waste Account and establish a baseline to measure changes ~~Establish a baseline through a new National Waste Account from which to measure changes~~ in procurement of goods containing Australian and imported recycled materials by 2020	2	
			Set mandated, publicly reported targets~~30 per cent~~ for average recycled content in 5 priority procurement categories for ~~goods and~~ products and materials purchased by governments, by total volume, by 2025	2	Categories eg infrastructure, civil construction, general goods
Strategy 9: Sustainable procurement by business and consumers -	2		*Review of ~~regulatory~~ barriers and opportunities (including regulatory) for use of recycled content in products by 2020*	2	

Businesses and individuals in Australia take environmental issues into account when purchasing, importing or manufacturing goods and services, and promote domestic demand for recycled materials and products containing recycled content			*National i~~I~~nnovation fund to support~~in~~ resource recovery and remanufactur~~e~~ing of products with recycled content. ~~uses for recycled content better supported~~ in place by 2020*	2	
			Develop n~~N~~ational standards and specifications for use of high priority recycled materials in products or applications~~in place~~ by 2020	2	How will priorities be determined? Explain reasons why we need common approaches to standards – so that product/industrial designers, manufacturers and waste industry can design for recovery.
			National Packaging Targets, focused on recycled content in packaging, achieved by the Australian Packaging Covenant Organisation by 2025	1	Increasing the demand for recycled content could reduce the quality of the recycling stream – need to balance against targets for avoidance and reuse of packaging.
			Standardised national product labelling indicating percentage of Australian and imported recycled content in packaging in place by 2020	2	
			Australian businesses adopt, implement and report on their sustainable procurement policies or guidance with measurable targets for use of recycled content by 2025	1	Reporting requirements should be built into annual reporting requirements
			Set voluntary, publicly reported targets~~30 per cent~~ for average recycled content in 5 priority procurement categories for ~~goods and~~ products and materials	2	Categories eg infrastructure, civil construction, general goods

			purchased by governments, by total volume, by 2025		
			NEW - Investigate the feasibility of using economic instruments such a taxes and financial incentives to create demand for products with Australian recycled content compared to virgin material content by 2020.		
			NEW – Undertake a review by 2020 of existing rating schemes for eg products, infrastructure and civil construction and ensure that waste avoidance and minimisation, reuse, recycling, resource recovery and use of recycled content is included and weighted appropriately.		

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

Strategy	***Do you agree?*** **Ranking: 1 yes, 5 no**	***If not, why not?***	**Interim Milestones** **(revisions in red, new milestones in green)**	***Do you agree?*** **Ranking: 1 yes, 5 no**	***If not, why not?***
Strategy 10: Plastics and packaging - *Reduce the environmental impacts of plastic and packaging, reduce plastic pollution, and maximise benefit to environmental and human health as well as the economy ~~and society~~*	2		*~~Targets established to p~~ Phase out priority ~~problematic and unnecessary~~ single-use plastic packaging by 2019*	3	Are priorities single use plastic bags and general purpose straws?
			Problematic and unnecessary plastics~~, including single-use plastic~~ packaging identified and prioritised by 2020	1	
			100 per cent of microbeads from rinse off cosmetic and personal care products phased out by 2020, and options examined to broaden phase out to other products	1	
			Problematic and unnecessary single-use plastic packaging phased out through redesign, innovation, or alternative delivery methods by 2025	1	
			NEW – Develop a system to manage the import, use, manufacture and end of life disposal of plastics and packaging to minimise environmental and human health impacts by 2025.		

			NEW – Collaborate to prioritise preventative actions for microfibres by 2020 and implement actions by 2025		Eg filtration devices on washing machines
Strategy 11: Sound management of chemicals and hazardous waste - *Implement reforms to minimise and -manage chemicals and wastes throughout their lifecycle to minimise environmental and human health impacts and meet Australia's international obligations*	2		*Develop consistent, transparent, predictable and streamlined regulation to minimise and manage environmental risks of chemicals and wastes for all Australians by 2025*	2	See rewording
			Better manage and report on the import, export, use, manufacture and end-of-life disposal of products and articles containing hazardous substances by 2025	3	How will we know that we are better managing and by when?
			NEW - Investigate regulatory and economic instruments to design out hazardous materials from products by 2021 and implement by 2025.		
			Prevent or significantly reduce environmental and human exposure to chemicals and wastes that are known to be hazardous, bio accumulative or persistent by 2020	1	How does this align to UNSD Goal 12?
			Evaluate and report on ~~Consider~~ the performance of Australia's hazardous waste management framework in reducing and managing hazardous waste, including new and emerging wastes, by 2020	2	See rewording

			Identify high priority hazardous substances and support development of national plans for reduction and management by 2020		
			Divert batteries from landfill through a product stewardship scheme or other appropriate end-of-life management system, by 2025		
Strategy 12: Organic Materials - *Reduce the generation and landfill disposal of organic waste, including garden and food waste, ~~by avoiding their generation~~ and support~~ing~~ diversion of remaining material to higher order uses ~~soils and other uses,~~ supported by appropriate infrastructure*	2		*Businesses across the food supply and consumption chain become signatories to the voluntary commitment program to reduce food waste by 2019*		Government has already allocated funding to oversee voluntary commitment program
			Work underway in every Australian state and territory to better manage organic material by 2020		Well underway in NSW. Needs to clarify what outcome is desired – eg develop end markets
			25 per cent reduction in organic waste sent to landfill by 2025		low targets for NSW – NSW could act as a case study for other jurisdictions to follow
			NEW – Investigate and report on strategies to increase the recovery of organics from municipal solid waste by 2019 and implement strategy to achieve greater recovery of MSW by 2025		
NEW – Strategy: Identify, map and manage recycle material flows to maximise opportunities for			*Develop a national online exchange to reduce transaction costs for recycle buyers and sellers and to bring transparency*		

procurement and remanufacture			*to available stockpiles, location (transport costs), quality and contamination levels by 2025*		
			Develop national indexes of market information available for use in processing contracts		
			Develop a common regulatory approach to stockpiling of waste products for reuse and recycling to enable quantities of certain types of material [inerts?] to be stockpiled for efficient transportation and use		

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

Strategy	***Do you agree?*** **Ranking: 1 yes, 5 no**	***If not, why not?***	**Interim Milestones** **(revisions in red, new milestones in green)**	***Do you agree?*** **Ranking: 1 yes, 5 no**	***If not, why not?***
Strategy 13: Data and reporting - *Continue to improve national data and reporting on material flows, wastes and recycling, including economic aspects and reporting indices, to support consumers and manufacturers to make more informed decisions*	1		*Publish biennial National Waste Reports that drill down to local government level in transition to real time reporting by 2025, ~~and~~ includinge ~~d~~ data generated through a new National Waste Account by 2020*		We already do public biennial National Waste Reports so not really a milestone. Data on infrastructure inventory should also be included.
			Investigate options for the production of ***infrastructure****, trade and market information, including imported and exported product and packaging information and material flows, by 2020 and implement by 2025*		By infrastructure do you mean indexes or exchanges? unclear
			Data and reporting improvements program implemented by 2020		
Strategy 14: Market development and research - *All Australian governments and businesses generate and report information to support creating and maintaining markets for recycled materials, both domestically and internationally*	1		*Review existing recycling data collection methodologies by 2020*		
			Analyse barriers and opportunities in markets for goods containing recycled content by 2018, and review every five years		
			Ensure resources and funding are available to i~~I~~mprove support for innovation and research and development in waste management and recycling by 2025		