

# **Submission on draft NSW Circular Economy Policy Statement and Discussion Paper**

November 2018

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## Opening

Local Government NSW (LGNSW) is the peak body for local government in NSW, representing NSW 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 make a submission on the Draft NSW Circular Economy Policy Statement and Discussion Paper. We strongly support NSW having a circular economy policy to guide the transition to a more sustainable future for NSW.

While a good start, the impetus for developing this policy (the impact of China's National Sword Policy) has resulted in short lead times for policy research and analysis. Further work to analyse the potential benefits and opportunities to the NSW economy as a whole, rather than focussing on the resource and recovery sector is required.

This submission has been developed with considerable input from councils in NSW.

## Purpose

The NSW Government has released a discussion paper and draft Circular Economy Policy Statement about how the circular economy can be applied in NSW and the benefits it could bring. The consultation aimed to encourage dialogue on circular economy principles and how these might be applied in NSW.

The NSW Government is seeking feedback to inform the finalisation of a NSW Circular Economy Policy and develop a NSW Circular Economy Implementation Plan.

## Background

The NSW Government is developing a Circular Economy Policy for NSW which it defines as an economy that values resources by keeping products and materials in use for as long as possible. Maximising the use and value of resources brings major economic benefit, contributing to innovation, growth and job creation. A circular economy can help protect businesses from fluctuating resource commodity prices and provides a more stable operating environment for manufacturers, retailers and consumers.

The accompanying Discussion Paper sets out how the circular economy can be applied in NSW and the benefits it could bring with the aim of encouraging dialogue on circular economy principles and their potential application in NSW. The paper also proposes the next steps and priority focus areas for NSW Government. Questions have been provided throughout the Paper to stimulate further discussion. A draft Circular Economy Policy Statement has also been developed reflecting the principles and focus areas of the Discussion Paper.

Circular economy approaches have been adopted by cities, states and nations across the world, particularly in Europe, Asia and North America. Most states and territory governments and the Australian Government are developing circular economy policies and approaches. Several NSW councils are also taking a circular economy perspective when dealing locally with recycling and resource recovery.

## General Response

While the consultation survey approach may streamline the submission process and make collation of feedback easier for Government, the questions were somewhat limited in nature. LGNSW welcomes the opportunity to supplement our responses to those questions with this submission.

### Integration with current policies

The draft policy statement would benefit from considering how it contributes to/integrates with/works with other related international, national and state policies/targets that are also working towards a sustainable future such as:

- NSW Premier's priorities – creating jobs, delivering infrastructure
- NSW Resource Efficiency Policy
- NSW Climate Change Policy Framework
- United Nation's Sustainable Development Goals 9,11,12,13,
- National policies and targets:
- National Waste Policy and waste and recycling targets
- Australia's 2030 climate change target
- Australia's Renewable Energy Target
- Australian Product Stewardship Act and Framework
- Other states' circular economy policies for alignment
- Australia's export and import controls

It is viewed as inappropriate at this early policy development stage to target specific programs (such as *Waste Less Recycle More*) as policy delivery vehicles prior to policy development and implementation planning. Substantial upfront investment will be needed across the economy to transition to the circular economy. This investment should not be automatically be earmarked to come from existing programs such as *Waste Less Recycle More*.

### The need for a deeper dive

The impetus for developing this policy statement (the impact of China's National Sword Policy and the work of the NSW National Sword Taskforce) has resulted in short lead times for policy research and analysis. Consideration should be given to further work to analyse and quantify the potential barriers and opportunities to the NSW economy (eg at sector level) and to identify targets and milestones (in a circular economy strategy, for example) to inform the implementation plan. This would also allow the relevance of the targets and milestones in the soon to be finalised National Waste Policy to be considered in the NSW context.

The 'whole of government' draft policy statement and discussion paper is focussed on the waste and resource recovery outcomes. The Circular Economy Policy is an opportunity to encourage a range of sustainability outcomes and transition other sectors of the economy. LGNSW recommends the inclusion of enablers - energy, water, procurement, logistics and digital/communications as well as waste and resource recovery in the NSW Government's approach.

The draft documents lack the identification of a process for prioritising sectors of the economy for implementation planning, that will maximise the benefits and opportunities of the circular

economy in NSW. Any process should consider the inclusion of a sectorial analysis of the barriers, challenges, drivers and opportunities transitioning to the circular economy would bring, as well as supply and material chain mapping and analysis.

The policy levers covered in the discussion paper to bring about change are limited. LGNSW recommends further research to develop a toolbox of policy levers, such as appropriate economic instruments, behaviour change programs, voluntary and mandated targets, networks and material exchanges. Research should include international best practice and its relevance to the NSW context.

While the presentation of international best practice approaches is welcomed, there are good examples of localised circular economies operating in NSW businesses that could also be showcased that are more likely to empower localised change.

### **Immediate action for the waste and resource recovery sector**

Given the current impetus to improve processing of recyclables and end markets for recycle onshore, there is an immediate need to develop a circular economy strategy for the waste and resource recovery sector that can inform or act as a model for a sectorial approach to other enabling and priority sectors (eg food and beverage manufacturing, retail and construction) of the NSW economy. This strategy should also consider (or be integrated with) any long term waste and resource recovery infrastructure plan that the NSW Government is currently undertaking.

The finalisation of the circular economy policy statement and further circular economy strategy and implementation plan work should not halt essential industry, investment and market development for the waste and resource recovery sector.

LGNSW calls on the NSW Government to ensure that 100% of the levy arising from Section 88 of the *Protection of the Environment Operations Act 1997* be used for waste infrastructure and programs, predominantly by local government and the waste sector, for initiatives such as:

- Development of regional and region-specific solutions for sustainable waste management (e.g. soft and hard plastic recycling processing facilities, green waste, waste to energy).
- Support innovative solutions to reduce waste and waste transport requirements.
- Protect existing and identify new waste management locations.
- Local community waste recovery and repair facilities.
- Funding a wider range of sustainability initiatives, such as; waste to energy, marketing and strategies, that promote and support a circular economy.

### **The role of communication and education in behaviour change**

Transitioning to a circular economy approach is a culture shift and a change in perception for government departments, consumers and business alike and will require a focus on communication, education and behaviour change. This is not identified as a circular economy principle and has little focus in the draft policy and discussion paper. There is also a need to focus on greater consumer transparency and public awareness so that the community is aware of the source of their materials and products, and are empowered to drive change through their consumer choice.

## Expand the role for the NSW Government

The role of the NSW Government in the circular economy is three-fold:

- Whole-of-Government policy setting to establish appropriate policy frameworks and programs across all agencies is needed to embed circular economy principles in NSW businesses and the community.
- Government agencies' own operating environments and those of their contractors and suppliers should embed circular economy principles.
- Local, national and international advocacy.

The draft policy statement presents a limited role for the NSW Government. It recognises the NSW Waste Avoidance and Resource Recovery Strategy as the sole policy framework for implementation and provides little direction for government operations.

LGNSW recommends a more expanded role for the NSW Government in its policy setting and operating environment if the NSW economy is truly to embrace a circular economy approach and adopt the principles identified in the policy statement of:

- minimise consumption of finite resources
- decouple economic growth from resource consumption
- design out waste and pollution
- keep products and materials in use
- innovate in resource efficiency, give preference to higher order re-use and repair opportunities
- create new circular economy jobs.

The NSW public sector is singled out as an early policy adopter, yet the timeframe for public sector embedding circular economy principles is the same as the private sector – “to embed circular economy principles in NSW public and private sector decision making, and the NSW mindset more broadly, by 2025”. Consideration should be given to a different timeframe for public and private sectors.

Consideration should be given to including a vision in the policy statement as well as some high level goals. The one and only objective of “embedding circular economy principles in NSW public and private sector decision making, and the NSW mindset more broadly, by 2025” is a good marker along the pathway to the circular economy, however it does not provide the vision to recognise what a circular economy means for NSW, nor how we will know when we have achieved such a vision.

The EPA, which is leading the circular economy policy work, is extremely resource constrained and has the primary role as environmental regulator. It is not the appropriate agency to lead a ‘whole of government’ commitment to transition NSW to a circular economy including embedding circular economy principles across government operations, including service delivery, infrastructure, purchasing decisions and regulatory frameworks.

The policy is also very focussed on domestic waste and recycling opportunities rather than broader opportunities in the waste sector. LGNSW recommends further investigation and focus on opportunities across other sectors, retail, food and beverage, commercial and industrial sectors for example.

It may be more appropriate that the lead agency for the circular economy is the Department of Premier and Cabinet or a new agency, similar to South Australia's Green Industries or Victoria's Sustainability Victoria. Consideration should be given to making 'creating a state wide circular economy' a Premier's priority as an evolution of the 'Reduce the volume of litter by 40 per cent, by 2020' priority.

### **The role of product stewardship and extended producer responsibility**

LGNSW has long advocated for the requirement of producers to take greater responsibility for their products, so there will be less waste to deal with, and so that the environmental impacts of waste will be reduced. LGNSW advocates on behalf of councils for the following issues to be addressed:

- Responsible packaging design and extended producer responsibility for packaging waste
- Management of problem wastes including but not limited to paints, batteries, chemicals, mattresses, electronic waste (e-waste) and asbestos
- Reducing the impact of plastic shopping bags, microbeads and other pollutants.

Please also refer to LGNSW's submission to the Australian Government's Product Stewardship Review which includes feedback on how product stewardship schemes can be expanded and what products should be included in a product stewardship scheme.

While the product stewardship legislation is national, there is opportunity for the NSW Government to investigate and implement product stewardship schemes at state level (for example Return and Earn) and investigate extended producer responsibility opportunities with manufacturers of problematic products.

### **Policy implementation**

LGNSW notes that a Circular Economy Implementation Plan will be developed by 2020 to establish timing and direction for implementation in the eight focus areas. Consideration should be given to first developing a circular economy strategy that applies these eight focus areas to priority sectors of the economy, identifies goals and targets (and where possible benchmarks), and sets in place an evaluation and monitoring framework. This would provide the pathway for developing implementation plans for priority areas.

Given the range of stakeholders involved in transitioning to the circular economy, establishment of a cross sector implementation plan reference group should be considered to guide strategy and implementation (if this remains the next step), rather than the policy and implementation plan being reviewed in line with NSW Government regulations.

### **Consultation Questions**

The attached table presents responses to the consultation questions posed in the *Too Good to Waste – Discussion paper on a circular economy for NSW*. Changes to the wording of the eight focus areas are tracked in red and an additional question was added by LGNSW during its consultation with councils to provide feedback on the six principles (an area not covered by the survey questions).



## Summary of Recommendations

- 100% of the waste levy be used for waste infrastructure and programs, predominantly by local government and the waste sector, for initiatives such as:
  - Development of regional and region-specific solutions for sustainable waste management (e.g. soft and hard plastic recycling processing facilities, green waste, waste to energy).
  - Support innovative solutions to reduce waste and waste transport requirements.
  - Protect existing and identify new waste management locations.
  - Local community waste recovery and repair facilities.
  - Funding a wider range of sustainability initiatives, such as; waste to energy, marketing and strategies, that promote and support a circular economy.
- Include other enablers - energy, water, procurement, logistics and digital/communications, as well as waste and resource recovery - in the NSW Government's approach.
- Undertake further research to develop a toolbox of policy levers, such as appropriate economic instruments, behaviour change programs, voluntary and mandated targets, networks and material exchanges.
- Expand the role for the NSW Government in its policy setting and operating environment so the NSW economy can truly embrace a circular economy approach and adopt the principles identified in the policy statement, for example *minimise consumption of finite resources* and *decouple economic growth from resource consumption*.
- Set shorter timeframes for the public sector to embed circular economy principles if it is to be an early adopter.
- Further investigate and focus on opportunities across other sectors, retail, food and beverage, commercial and industrial sectors for example.
- Take a more proactive approach with different business models to provide waste and resource recovery infrastructure to provide the best sustainability outcomes for NSW
- Establish and facilitate a Circular Economy Hub, with a supply chain as well as a government focus, to pilot and share approaches
- Establish an independent body to guide, assist, undertake R&D innovation, knowledge share and monitor and evaluate the progression to the circular economy.
- Include focus on increasing consumer awareness and behaviour change.
- Consider responsibility for the circular economy being removed from one agency (EPA) so it can be truly whole of government, for example Department of Premier and Cabinet or a new agency similar to Sustainability Victoria.

## Conclusion

LGNSW welcomes the NSW Government's policy direction to transition to a circular economy in NSW. We strongly support NSW having a circular economy policy to guide the transition to a more sustainable future for NSW.

While a good start, the impetus for developing this policy (the impact of China's National Sword Policy) has resulted in short lead times for policy research and analysis. Further work to analyse the potential benefits and opportunities to the NSW economy as a whole, rather than focussing on the resource and recovery sector, is required.



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

## Attachment: Too Good to Waste discussion paper on a circular economy approach for NSW - Answers to consultation questions

Topic	Questions for consultation	Local Government Response
General	Do you support NSW having a circular economy policy?	<p>Yes, however the policy should be supported by a CE strategy with associated implementation plan. Consideration should be given to analysing and quantifying the potential barriers and opportunities for NSW (as a precursor to any implementation plan development).</p> <p>The one and only objective/goal in the policy is to embed CE principles in NSW public and private sector decision making, and the NSW mindset more broadly, by 2025. Given the NSW public sector is singled out as an early policy adopter, the timeframe for public sector embedding CE principles should be set earlier than the private sector. Milestones to reach this objective should be included.</p> <p>LGNSW believes the lead agency for the implementation of a circular economy should not be the environmental regulator, but rather Department of Premier and Cabinet or a new organisation similar to SA's Green Industries or Sustainability Victoria. Consideration should be given to making - creating a state wide circular economy - a Premier's priority as an evolution of the 'Reduce the volume of litter by 40 per cent, by 2020' priority.</p>
	What would you like to see in a Circular Economy Policy?	<p>A vision – identification of ambition level (including timeframe)</p> <p>A commitment to develop a CE strategy that identifies priority sectors of the economy for focussed work based on sound research, data and analysis including supply and material mapping and analysis. This would include establishing benchmarks and targets for tracking progress. An example for the reuse and repair sector would include:</p> <ul style="list-style-type: none"> <li>• Baseline data and ongoing data collection on volume and value (financial, environmental and social) of items reused and repaired</li> <li>• Analysis of current research and data available on reuse, repair and technologies available to recover materials,</li> <li>• Identification of infrastructure needs eg reuse centres, repair facilities and recycling facilities</li> <li>• Domestic and overseas supply chain analysis</li> <li>• Stakeholder analysis and priority target audiences, as well as barriers and drivers to behaviour change</li> <li>• Identification of economic instruments to incentivise transition to a circular economy</li> <li>• Communication strategies for target audiences to support transition to a circular economy</li> </ul>

		<p>Data collection and analysis to inform Policy activities, targets and measures in the Policy, such as how end-to-end product chains co-exist currently and how they could be re-imagined. Data collection and analysis measures that are robust and agreed are required across all focus areas in the Policy.</p>
	<p>How could the Government support a transition towards a circular economy?</p>	<p>Communicate and educate business and community on the circular economy and the value it brings to the NSW economy</p> <p>Use of regulatory powers, incentives, labelling and certification schemes</p> <p>Tax incentives eg payroll tax subsidies for reuse and repair organisations</p> <p>Leverage the purchasing power of government to drive market change</p> <p>Lead by example on reuse, repair, refurbish</p> <p>LGNSW recommends the establishment an independent body to guide, assist, undertake R&amp;D innovation, knowledge share and monitor and evaluate (based on agreed metrics)</p> <p>LGNS recommends the establishment and facilitation of a Circular Economy Hub with a supply chain focus as well as a government focus to pilot and share CE approaches</p> <p>Provide for industry development, and develop investment and market strategies, for secondary processing of materials</p> <p>R&amp;D to identify problematic products and materials and measures to safeguard environment and human health</p> <p>Provide regulatory certainty to aid development of new markets</p>
	<p>What are the main barriers to the implementation of a circular economy? (pick up to three)</p> <ul style="list-style-type: none"> <li>○ government policy and legislation</li> <li>○ consumer awareness and preferences</li> <li>○ technology</li> <li>○ funding for research and development</li> <li>○ collaboration across supply chains</li> <li>○ other – please specify.</li> </ul>	<ol style="list-style-type: none"> <li>1. Government policy and legislation</li> <li>2. Funding for research and development</li> <li>3. Consumer awareness and preferences/collaboration across supply chains</li> </ol> <p>Other:</p> <ul style="list-style-type: none"> <li>● Deep seated cultural behaviour norms</li> <li>● Price of virgin materials outcompetes secondary materials due to lack of whole of life cycle costing</li> <li>● Built in obsolescence</li> </ul>

<p><i>Circular Economy Principles for NSW (p16)</i></p> <p><i>Added question by LGNSW for council consultation</i></p>	<p><i>Do you agree with the six principles and descriptions?</i></p> <ul style="list-style-type: none"> <li>○ <i>minimise consumption of finite resources</i></li> <li>○ <i>decouple economic growth from resource consumption</i></li> <li>○ <i>design out waste and pollution</i></li> <li>○ <i>keep products and materials in use</i></li> <li>○ <i>innovate in resource efficiency, give preference to higher order re-use and repair opportunities</i></li> <li>○ <i>create new circular economy jobs.</i></li> </ul>	<p><i>Yes</i></p> <p><i>With an additional principle (and an additional focus area)</i></p> <ul style="list-style-type: none"> <li>● <i>Foster behaviour change through education and engagement on the circular economy</i></li> </ul>
<p><b>Eight focus areas for NSW Government</b></p>	<p>The order of focus areas should reflect the waste hierarchy.</p>	<p>The focus areas should reflect a broader sustainability agenda including the United Nations Sustainable Development Goals</p>
<p><u>Promote and facilitate Support Innovation, collaboration and skills</u></p>	<p>How could a new or improved research support platform support circular economy?</p>	<p>Generate and support ideas, moving sound ideas forward to implementation for both business and government</p> <p>Connect innovative people, ideas and resources to transition to CE</p> <p>Work to deliver CE at the appropriate level (local, regional and state level, or at all levels, dependent on the strongest business case (eg recycle food and beverage close to source of waste, transport higher value recycle further)</p> <p>Bring supply chains together including consumers to identify areas of CE innovation</p> <p>Develop mechanisms for pricing secondary materials at a level where they outcompete virgin materials</p> <p>Develop people skills to assist delivery of circular economy</p> <p>Data to monitor and inform work</p>
	<p>What services and support would you like to see a circular economy innovation hub provide?</p>	<p>Identify innovation priorities across the economy</p> <p>Integrate circular economy thinking and approaches into existing industry (eg SME) and social enterprise programs and innovation hubs</p> <p>Deliver commercialisation and leadership programs focussed on CE</p> <p>Seed funding for research and easier pathways to scale up proven innovations</p>

		<p>Deliver systems to improve forward and reverse logistics setups</p> <p>Trial and case study alternate business models</p> <p>Unlock peoples' expertise, interests and life experiences to improve capacity and systems</p> <p>Secondary materials market exchange</p> <p>Develop and deliver behaviour change programs for eg supply chains, consumers</p> <p>Shared data</p>
	Do you have a comment about this focus area?	Link to Australian Government innovation programs and other states' CE work
<p><u>Sustainable</u> <u>Proactive</u> procurement <u>practices and</u> <u>market</u> <u>development</u></p>	What purchasing decisions do you make where circular economy principles can be applied?	With a spend of over \$10 billion annually on procurement – from construction materials, office-related products, catering through to energy, water and landscape products, local government makes daily purchasing decisions where circular economy principles can be applied.
	How do you think the NSW Government could increase the use of re-usable and recyclable material through its purchasing decisions?	<p>Publicly reported recycling targets for local and NSW governments procurement transitioned to over time</p> <p>Write it into standard form contracts with suppliers and contractors (reuse of materials etc) so adopted across government</p> <p>Promotion, training and where appropriate mandating of AS/ISO 20400 and AS/ISO 20600 including the use of model procurement templates that include circular economy principles.</p> <p>Ensure CE principles are embedded in existing environmental rating schemes</p> <p>Short term economic instruments that encourage market development of products in line with the waste hierarchy</p> <p>Develop specifications and standards that actively encourage the use of recycled materials and support businesses that successfully certify against specs and standards</p> <p>Development and promotion of alternative procurement models (eg goods provided as a service designed for long life with upgrades and maintenance integrated as part of contract; reuse, repair, remanufacture, refurbish of products already procured and to be procured by govt)</p> <p>Ensure sustainable procurement policies and frameworks are widely adopted</p>

		State level campaigns to promote positive consumer choices
	Do you have a comment about this focus area?	Procurement is the number one enabler of CE to stimulate demand for goods and services that deliver CE
High quality, consistent recycling <u>and secondary processing</u>	What would help you recycle more of the products you use?	<p>Knowing exactly what should go in the yellow bin and making it easy for me to recycle other products locally</p> <p>Effective product stewardship systems</p> <p>Localised systems that make it easy for people to sort and recycle</p> <p>Incentives to encourage recycling built into product pricing models</p> <p>Effective consistent labelling and third party certification</p>
	What can the NSW Government do to better support the recycling industry?	<p>Reinvest the NSW waste levy back into the waste and resource recovery industry to fund the transition to the circular economy</p> <p>Build a sustainable domestic recycling sector through technology, infrastructure and industry and market development. For the last decade, the NSW Government has played a passive role in ensuring sufficient waste and recycling facilities are available in NSW, leaving it to the market to provide. This strategy has failed NSW communities. LGNSW recommends a more proactive approach and different business models to provide infrastructure to provide the best sustainability outcomes for NSW. For example, other agencies such as NSW Fisheries will invest and build facilities such as aquaculture businesses and then lease or sell these business to commercial interests.</p> <p>Work with the Australian Government to access additional policy levers such as taxation and national regulation and schemes. For example, regulations to make packaging easy to recycle for the consumer and more recyclable for secondary processing.</p> <p>Benchmarks and systems of accreditation for quality control at MRFs with consideration at householder level</p> <p>Capture and promote the CO2 reduction benefits of recycling activities</p> <p>Create the markets for Australian sourced recycled products (eg by buying 100% Australian sourced recycled paper, glass sand use in civil construction etc)</p> <p>Investigate and trial innovative source separated collection systems</p>

		<p>Fund innovation, commercialisation and adoption of leading edge technologies to develop secondary materials markets eg industry development of secondary processing sector for cleaner better sorted streams; similar initiative to CSIRO ASPIRE platform for industrial symbiosis</p> <p>Buy recycled basic office products that use Australian material eg recycled paper and AS5810 satchels</p>
	Do you have a comment about this focus area?	Definition of recycling needed in discussion paper
<p><u>Maximise the value of organics</u></p>	Would you support zero food and garden waste to landfill?	<p>Further information required prior to answering. Separate streams (food and beverage organics, kerbside FOGO, garden organics, municipal food waste) have different systems so targets, strategies and timing of ban might differ. Potential for support depending on how it was done eg transitional arrangements with targets. A ban on supermarket food waste to landfill may be a logical start.</p> <p>In parallel with any ban should be the prioritisation of higher order uses for recovered organics</p>
	What measures do you think would help organics become more circular and reduce food waste to landfill in NSW?	<p>Small scale local treatment and market development close to source in regional areas</p> <p>Proven easy to use technologies and systems for new high rise developments and large scale developments</p> <p>Funding support for regional/local solutions</p> <p>Rigorous scientific study and certainty of end markets</p> <p>NSW Govt leading by example within its own operations and with its contractors (schools, TAFE, leased food premises etc)</p> <p>A greater range of high level uses for recovered organics</p>
	Do you have a comment about this focus area?	<p>Restricting organics to landfill would benefit from staged-implementation of targets for those most able to respond quickly eg such as supermarkets to have shorter deadlines to reach zero targets</p> <p>This would allow markets to develop before councils in Sydney collected food organics. Many Sydney councils have trialled food waste collections but multiple barriers have meant that few have transitioned into a regular service</p>



Mainstream product stewardship	How do you think product stewardship schemes can be expanded, and what products should be included in a product stewardship scheme?	<p>Refer to <a href="#">LGNSW submission</a> to the Australian Product Stewardship review</p> <p>Consideration could be given to landfill bans for potentially hazardous products such as batteries and e-waste with support for parallel mandatory product stewardship schemes</p> <p>By firmly linking policy and regulatory platforms</p>
	Do you have a comment about this focus area?	A clearer pathway for LG input to product stewardship policy work would be welcomed/
Responsible packaging	What actions would you like to see the NSW Government take to better support these national targets?	<p>Ensure NSW MRFs are able to process and have the capacity to process packaging types promoted through national targets eg compostable packaging</p> <p>Procurement practices that incentivises packaging design that avoids waste, followed by reuse, recycled content and recyclability in packaging material (in line with the waste hierarchy).</p> <p>Advocate to Australian Govt to incentivise purchase of responsible packaging eg removal of GST (see EU RREUSE examples <a href="http://www.rreuse.org/wp-content/uploads/RREUSE-position-on-VAT-2017-Final-website_1.pdf">http://www.rreuse.org/wp-content/uploads/RREUSE-position-on-VAT-2017-Final-website_1.pdf</a>)</p> <p>Showcase business cases demonstrating responsible packaging in the private and public sector</p> <p>Advocate for stronger import restrictions on non-recyclable packaging and single use plastics or packaging outside the scope of National Waste Policy targets.</p> <p>Education campaigns to ensure packaging is recycled right (eg compostable packaging that looks similar to common recycled packaging)</p>
	Do you have a comment about this focus area?	APCO targets are now national packaging targets, and combined with the updated National Waste Strategy targets, should be met through circular economy approaches where appropriate.
Support <b>maintenance</b> re-use, repair <b>and</b> , <b>refurbish</b>	<p>What would encourage you to repair products you already own or choose second-hand products?</p> <p>Do you have a comment about this focus area?</p>	<p>Develop the capacity across NSW for reuse and repair – nurture organisations willing to provide this service, provide skills development and co-locate with community hubs and waste and recycling drop off points.</p> <p>Assist businesses to educate purchasers about the potential for reuse and repair to increase take up by consumers</p> <p>Set government targets for reuse and repair for procurement lines</p>

		<p>Introduce a rating/certification/warranty system for the reuse/repair/refurbish market</p> <p>Drive demand for better product information regarding expected lifespan and repairability of products/components through government procurement</p> <p>Introduce economic instruments to encourage donation and reuse/repair etc</p> <p>Advocate to Australian Government for national harmonised approach</p> <p>Provide incentives for reuse and repair business such as payroll tax subsidies</p>
<p><b>Better Design</b> Enhance circular economy through design</p>	<p>How would information on durability and repairability of products impact your purchasing decisions?</p>	<p>Information that government is leading the way would impact my purchasing decision, would make me less risk adverse</p>
	<p>Do you have a comment about this focus area?</p>	<p>Influence design curriculum to ensure that CE is enhanced through design</p> <p>Cultural and behavioural changes linked with economic instruments</p> <p>Refer to <a href="#">LGNSW submission</a> to the Australian Product Stewardship review</p>
<p><b>Are any other focus areas needed?</b></p>		<p>See additional focus areas below</p>
<p>Use economic instruments to kickstart the circular economy</p>		<p>Advocate to Australian Government for different GST treatment for virgin vs recycled content in major product manufacturing and importation categories eg road construction, packaging etc;</p> <p>Introduce payroll subsidies for reuse/repair organisations</p>
<p>Monitor and evaluate the transition to the circular economy</p>		<p>Establish an independent well resourced research organisation to develop and use agreed metrics to monitor and evaluate success of the transition to the circular economy (similar to WRAP UK) including the collection of data.</p>
<p>Change behaviour to support the transition to the circular economy</p>		<p>An extensive education, media and communications strategy and investment plan is required to support the transition to a circular economy. Research is needed to identify the barriers and drivers to changing consumers purchasing decisions eg repairing and reusing items and buying second hand is normalised.</p>