

Waste Reduction and Recycling and Other Legislation Amendment Bill 2023

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To Whom It May Concern

Waste Reduction and Recycling and Other Legislation Amendment Bill 2023

On behalf of the Australian Council of Recycling (ACOR), we welcome the [Queensland Government's Waste Reduction and Recycling and Other Legislation Amendment Bill 2023](#), to support the development of a circular economy.

ACOR is the peak industry body for the resource recovery, recycling, and remanufacturing sector in Australia. Our membership is represented across the recycling value chain, and includes leading organisations in advanced chemical recycling processes, CDS operations, kerbside recycling, recovered metal, glass, plastics, paper, textiles and e-product reprocessing and remanufacturing, road recycling and construction and demolition recovery. Our mission is to lead the transition to a circular economy through the recycling supply chain.

Recycling is an integral gear within the circular economy, delivering significant social, economic and environmental value. The Australian recycling industry contributes almost \$19 billion in economic value, while delivering environmental benefits such as resource efficiency and diversion of material from landfill. One job is supported for every 430 tonnes of material recycled in Australia. The industry operates across our homes, businesses, factories and construction sites. It collects, sorts and reprocesses material, and makes new products with recycled content, creating more jobs for Australians.

Please find below ACOR's response to the Bill.

1. Definition of waste

ACOR strongly welcomes the proposed changes to the definition of *waste* to "enable a thing to be prescribed by regulation to not be a waste".

The 'once waste, forever waste' outlook is reflective of an outdated linear economy approach that classes waste as simply another pollutant that must be regulated, rather than a resource from which social, economic, and environmental benefits can be derived. For a circular economy to fully advance, recovered resources must be recognised as commodities competing on a level regulatory playing field with virgin and raw resources.

Further clarity should be provided on how an amended definition of waste will interact with Queensland's '[end-of-waste codes](#)'.

Above all, we strongly encourage the Queensland Government to work across jurisdictions to address a nationally harmonised definition of 'end of waste'.

2. Clean earth

ACOR supports the proposal to remove the automatic levy exemption for clean earth.

The removal of exemptions for clean earth from the landfill waste levy will incentivise resource recovery of this material and divert from landfill.

3. Chief executive decisions on Resource Recovery Area declaration and payments to local government

We note the proposals to enable the chief Executive to make decisions about amending or suspending a Resource Recovery Area declaration, and payment to a local government to mitigate direct effects of the waste levy on households.

We recommend that these powers should be granted on the basis of transparent decision-making, in accordance with the principles of best-practice regulation, as outlined in the [Queensland Guide to Better Regulation](#). Investment confidence in resource recovery will be curtailed if sudden decisions result in stranded assets.

In relation to payments to local governments, the intention of the waste levy is to divert material from landfill, to advance Queensland's resource recovery targets. Payments to ameliorate the effect of the levy undermine the intended effect of the levy.

4. Circular economy principle as a principle under the WRR Act

ACOR strongly supports enshrining the principle of circular economy in the *Waste Reduction and Recycling Act 2011* (WRR Act).

This principle underpins a better balance between environmental protection and resource recovery priorities, and aligns with the commitment of all Australian governments to "[keep materials in use and foster markets to achieve a circular economy by 2030.](#)"

5. Review date for the Waste Strategy

ACOR notes the proposal to change the Waste Strategy review date from 3 to 5 years.

A longer review period should be supported by regular reporting and constructive engagement with industry, to share insights, track progress and ensure that reviews are comprehensively informed.

The data and analysis that informs reporting and reviews must also reflect the distinct and detailed activities of waste management and recycling. Historically, reporting has conflated these two sectors, such that the true local capacity for recycling and re-manufacturing infrastructure is not well mapped. Logistics operators, aggregators, processors and remanufacturers are often defined as one group in data-sets, masking genuine capacity and the value chain required to deliver recycling outcomes.

Detailed and regular reporting of resource recovery and recycling activities will provide feedback about whether policy settings are adequate. This needs to happen expeditiously and frequently to confirm whether or not Queensland is on track to achieve resource recovery targets.

ACOR-initiative [Recycle Mate](#) can assist the Queensland Government by mapping resource recovery data across the state. Recycle Mate's live national platform can identify critical waste and resource recovery information for governments, highlighting shortfalls in collection options in regional areas, for example. The platform, built over three years, amasses recycling and safe disposal options for over 5,000 items, linked to mapped directions to more than 30,000 geolocated disposal options.

Recycle Mate allows governments, recyclers, product stewardship schemes and the community to work together to gather, share and update recycling information and avoid duplication of effort as our industry evolves. We strongly recommend the Queensland Government supports the uptake of Recycle Mate, which can help reduce contamination in recycling, as well as increase recycling rates through community and EPR recycling schemes.

Conclusion

ACOR welcomes the Queensland Government's attention to supporting a circular economy and boosting resource recovery and we would be very pleased to facilitate further dialogue and consultation with our sector.

Yours sincerely


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Chief Executive Officer