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To whom it may concern

**Tasmanian Positive—Our state's sustainability strategy: discussion paper**

On behalf of the Australian Council of Recycling (ACOR), we welcome the development of a sustainability strategy for Tasmania, to ensure that present-day economic development and resource use does not come at the expense of future generations or the depletion of natural resources.

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.

ACOR welcomes the positive steps the Tasmanian Government has already made towards increasing resource recovery, including the introduction of a container refund scheme, establishing a waste levy, and most importantly, the establishment of the Tasmanian Waste and Resource Recovery Board to reinvest waste levy funds back into resource recovery initiatives. Also very welcome is Tasmania's Waste Action Plan, as well as developing State Roads Recycled Materials Specifications that allow the use of recycled tyres, plastics and glass in road construction and resurfacing.

Among the possible sustainability priority areas for Tasmania is a circular economy and waste goal: to 'eliminate the disposal of waste to the environment through better consumption choices, production design and developing circular economies'. ACOR supports centring a circular economy in Tasmania's sustainability strategy and notes that recycling is an essential part of that transition.

Recycling is comprised of three key elements: collection, processing and end markets. If any one element is missing, recycling cannot occur. Recycling rates also need to match the volume of material on market.

The four priorities to boost recycling through Tasmania's sustainability strategy are set out below.

**Strong end markets for recycled materials**

Recycling cannot function without robust markets for recycled materials but there are significant barriers to market uptake of recycled material, including cost competitiveness with virgin materials and willingness within the supply chain to embrace change. Procurement of recycled materials must significantly scale up to properly kickstart supply chain integration of sustainable recycled products and materials, and establish robust, resilient end markets. Government has a key role to play in leading market demand for recycled content. Measures should be introduced to directly link government funded projects to procurement of recycled materials, to stimulate end markets.

**Alignment between environmental policies and circular economy principles**

An aligned and consistent regulatory environment is essential to delivering recycling outcomes. To this end, policies relating to resource recovery and recycling must be developed transparently and in collaboration with industry and broader stakeholders, supporting robust health and environmental outcomes, social licence, and investment confidence.

One necessary regulatory measure is a nationally consistent definition of 'end of waste'. A circular economy cannot advance if recovered resources are enduringly defined and managed as waste even after being adopted for reuse in other markets: the 'once waste, forever waste' outlook is a relic of a linear economy. Perpetually classifying recovered resources as waste creates an unequal playing field between virgin and recycled materials through additional regulatory hurdles placed on recovered materials, such as restrictions on storing materials and on trade and licence arrangements.

To support credible recycling outcomes, we encourage the Tasmanian Government to help advance the establishment of ACOR's [Australian Recyclers Accreditation Program](#), to establish an objective and consistent process for assessing a recycling operator's performance and providing assurance around the legitimacy of recycling operations. ACOR is also calling for the establishment of an Australian Resource Recovery Code Board, based on the model of the Australian Building Codes Board, to deliver a nationally harmonised framework for resource recovery and recycling and oversee an aligned and consistent approach to product stewardship with the priority of advancing circular economy outcomes.

### **Producer responsibility for end-of-use**

ACOR supports moves to place greater responsibility on producers and manufacturers for the lifecycle of their goods through product stewardship schemes, as they can be an effective way to ensure recyclability and fund recycling efforts. However, with the volume of material currently diverted to landfill, a more concerted effort is required to maximise recycling. ACOR is concerned that some existing product stewardship schemes are not delivering strong recycling outcomes, while future schemes are being established without the correct mechanisms in place to drive effective resource recovery.

A poorly designed product stewardship scheme can enable greenwash and cause more harm than good by slowing momentum while promoting ineffectual activities with strong marketing, failing to deliver effective and transparent outcomes for consumers, who essentially fund these schemes, and driving down resource recovery outcomes by prioritising cost reduction over performance.

### **A community that knows how to 'recycle right'**

Community confidence in recycling has been impeded by a lack of awareness of the breadth of genuine and productive recycling activities undertaken in Australia and confusion about what can and can't be recycled, and where. More than ever, the community seeks reassurance that what they are recycling is being recovered and manufactured into new products, rather than being sent to landfill.

[Recycle Mate](#) is Australia's first community-driven recycling app, free to download and use. It combines artificial intelligence with Australia's most comprehensive recycling directory, which allows users to search from over 5,000 items linked to mapped directions to more than 30,000 geolocated recycling locations. We recommend the Tasmanian Government supports the uptake of Recycle Mate, which can help reduce contamination in recycling while increasing recovery rates through community and EPR recycling schemes.

### **Conclusion**

A thriving recycling sector will drive Tasmania's transition to circular economy. ACOR strongly welcomes Tasmania's sustainability strategy and would like to play a constructive role in maximising recycling to further these goals. Our members bring considerable real-world resource recovery and recycling expertise through operating in every jurisdiction in Australia and internationally, and we would be very pleased to facilitate further dialogue and consultation.

Yours sincerely



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