



14 September 2020

Recycling & Recovery

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

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Dear Committee Secretary

***Re: Inquiry into the Recycling and Waste Reduction Bills 2020***

SUEZ appreciates the opportunity to provide a submission to the Senate Standing Committees on Environment and Communications inquiry in relation to the Recycling and Waste Reduction Bills 2020 package.

We understand the Bills would implement the 2020 commitment of the Commonwealth Government (through the former COAG) to ban the export of waste glass, plastics, tyres and paper, and incorporate the framework of the *Product Stewardship Act 2011* to regulate and encourage businesses that design, manufacture and distribute products to take greater responsibility for their environmental impacts.

As a member of the Waste Management and Resource Recovery Association of Australia, SUEZ is supportive of their submission and would like to provide the following comments.

SUEZ commends the work by Commonwealth, State and Territory Governments to date and believes these reforms will provide an important step change in driving long-term transformation in Australia's recycling sector.

SUEZ supports the objects of the Bill, which includes minimising the harm of waste to humans and the environment, encouraging a circular economy, and realising its economic benefits by:

- Providing a national framework for Commonwealth legislation to support reuse, recycling and recovery of waste in an environmentally sound way
- Banning the export of certain wastes so they do not cause harm to the environment or humans in importing countries, and
- Encouraging those responsible for using, designing, manufacturing and distributing products to take responsibility for those products.

SUEZ supports the rationale behind waste export licence conditions which may include the regulated waste material being processed to a certain standard or contamination thresholds being met prior to export.



These conditions, as well as the types of waste material to be regulated, are to be set out in rules made by the Ministers for the Environment. These rules will have a significant impact on the waste and resource recovery industry, and we believe mandatory early engagement with industry will be key.

Industry consultation and visibility of proposed quality standards for targeted materials, particularly in relation to contamination thresholds, will be critical to help drive a viable, circular approach. Due to the lead times associated with implementing new technologies and upgrading sites to meet new standards, SUEZ encourages the inclusion of as much information as possible in the final Act to provide certainty to industry.

SUEZ is supportive of consequences linked to the failure to comply with the prescribed export conditions. However, we believe that the penalties are excessive, particularly in relation to imprisonment for a third-party officer under the Bill. We recommend that imprisonment for a third-party officer is removed as a penalty in the Bill.

Our ability to undertake audits at offshore offtake facilities has been significantly impacted by COVID-19. As such, industry will be more reliant on statutory declarations and procurement checks.

Due to the lack of economically viable domestic offtake markets, the Bills cannot rely on a punitive approach alone for the export of materials that may only have export markets for remanufacturing available. Stimulating the creation of a domestic market to process and reuse recyclables locally is a critical element in encouraging greater diversion, fuelling demand for investment in scalable infrastructure and developing the industry towards a circular economy.

This must include mandated recycled content in new products and government procurement standards to stimulate pull-through demand and drive economically sustainable investment in new facilities.

SUEZ appreciates the opportunity to provide these comments. Should you require any further information, please don't hesitate to contact me or Laura Schwark, Head of Marketing and Corporate Affairs on  
or

Yours sincerely

**Justin Frank**  
Chief Sustainability & Communications Officer  
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