



Policy and Business Branch

Department of Primary Industries, Parks, Water and Environment

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TFGA Submission: Waste and Resource Recovery Bill 2021

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

Agriculture is one of the key pillars of the economy and, with the current level of support from government, are well positioned to further capitalise on the stature of Tasmania agriculture.

The TFGA appreciates the opportunity to make comment on the Waste and Resource Recovery Bill 2021.

The TFGA consulted with TFGA members (Producer) and a key stakeholder (Processor) to ensure all points of view were considered and meaningful information was gathered to secure broad representation for this submission. Due to the complexities of both the producer and processor feedback and some questions and observations from TFGA, it was thought that it is best to detail where every question and observation has originated from to give you a clear perspective of each point.

Producer Feedback and questions:

- One producer has stated that this will be a painful but unfortunately necessary application of levies to help encourage resource recovery. Many producers will have areas on their properties where they dispose of their rubbish.
- The same producer stated that in their view that the true cost of waste disposal needs to be applied for the sake of the environment. A downside to this bill and new levy system will be that this change will encourage individuals to dump rubbish anonymously in undisclosed locations to avoid the expense.
- Will council rates rise with the introduction of the new levy? If so, will this be a staggered increase every 2 years to reflect the levy rise from \$20-\$60 per tonne over a 6-year period?
- Refuse site (tip) entry will rise. It is widely thought among all producers that this will cause a surge in illegal dumping and/or burning of waste. How will this be prevented?
- It is widely thought that establishing a Board with new members is not necessary as local government are perceived to be already top heavy with current employees and could be sourced from existing staff/management.

- Manure has recently been classed as industrial waste in Victoria. Will this happen in Tasmania too? The agricultural industry would be strongly opposed to this.
- All biological waste (animal and vegetative) should be considered a resource and appropriately recycled back into the environment at the cost of the consumer.
- A meaningful dollar amount should be applied to all drink and food containers, regardless of construction materials, and the appropriate receipt terminals set up at the cost of the manufacturer and supplier of such products.
- The largest and most profitable packaging businesses in Tasmania and Australia, along with the large retailers, are creating the waste crises. These industries need to be made responsible and accountable for their products.
- This bill looks fraught with danger for producers.
- The levy will raise a lot of money and the producers have concluded that the Board will be funded from them. Some producers think we don't need a board and would like to know the budget for the Board and what this funding will include right down to ancillary costs such as board meeting catering, venue hire, administration and travel etc.
- How will this bill affect regional waste management sites such as Hamilton? This is a unique site that offers offal disposal. Will this incur the levy cost?
- Regional sites are normally only open 4 days per week at 2-3 hours per day. Staffing is an ongoing issue, and this levy may make it worse and more expensive, especially if they must collect fees as well.
- It has been perceived by some producers that this Bill and the new levy funds will be funding something else that has not been disclosed in the Bill. Could you please comment?

Processor Feedback and questions:

- Processors have numerous waste types that they dispose of on a daily basis including general recycling, biological and cardboard to name a few. Will all these waste classifications attract the new levy?
- An individual processor has estimated that this levy will cost their business \$60,000 more per annum to dispose of waste if the levy applies to all waste classifications. How will increased costs on business be managed?
- This extra cost could contribute to more processors closing their doors as most have very tight budgetary margins. What mechanisms are being put into place to manage this risk?
- Selling and exporting of offal provides most meat processors the profit margin needed to stay financially viable. This profit margin will not cover the extra cost the levy will generate. What risk analysis has been done on the effects of this levy on business?
- Will the levy apply to sanitary bin disposal?
- This processor asked Veolia if they will be on charging the cost of the levy when disposing at refuse site and they did not know as they don't know the categories of waste that would attract the levy.

TFGA Feedback and questions:

TFGA's concerns are mirrored by what has been outlined above by both producers and processors. Some other concerns not mentioned and reiteration of what has been mentioned is listed below:

- A concern that has been asked on numerous occasions by our members is will rates increase due to the new levy? Agricultural rates are already much more expensive than residential rates and most of the time they only get half or less of the benefits such as normal waste removal, street cleaning, regular road maintenance and community infrastructure.
- TFGA are disappointed that this Bill seems to be rushed through without all the facts being decided upon such as what waste classifications will attract the levy. A thorough, balanced and accurate submission can't be submitted without all of the relevant information. The fact that this information is unavailable has been interpreted by many of our members as a 'tick and flick' exercise and not as consultation at all. This causes uncertainty and distrust which in turn makes it very hard for Government to achieve their desired outcomes efficiently and amicably.
- These unknown aspects of the Bill could have significant flow on effect which stops other stakeholders from being able to keep their customers and clients fully informed. This is unacceptable as it stops local businesses from providing the best customer service experience that they can.
- TFGA would like to reiterate, that this extra levy will cause a substantial rise in illegal dumping and burning. Could you please advise how this risk is going to be mitigated?
- In the Bill it is mentioned that certain charitable organisations will have access to an assistance program to offset the cost of the new levy. Does this include charitable organisations and their members?
- Is there a cost for the waste refuse sites to dispose of waste to the resource reuse facilities?

In summary, there is substantial concern associated with the new proposed levy and the Bill itself from TFGA members and stakeholders. We are very concerned that this consultation process has been undertaken without providing all the facts so that a fair and equitable understanding of this significant change to business practise and expenditure can be understood. It has caused angst, uncertainty and distrust among all stakeholders involved which immediately puts Government on the backfoot for community consensus and adoption of this new levy. The TFGA requested further information via email on 2nd March 2021 regarding a complete list of exemptions for this new levy. Unfortunately, we were informed that this information could not be supplied at this time which is also a concern. This has prevented the TFGA from submitting a more informed and useful submission, which could have been avoided through a more thorough and transparent consultation process.

Thank you for the opportunity to provide you feedback to the proposed Bill. We would welcome further consultation on this matter to discuss the many questions and queries to enable TFGA to consult with our members and stakeholders further.

If you have any questions regarding this submission, please feel free to contact me and we look forward to hearing from you soon.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized circle with a vertical line through it, followed by a long horizontal stroke that tapers to a point on the right.

Peter Skillern
Chief Executive Officer
12th March 2021