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Publishers' Response to the Australian Government consultation paper: "Updating the 2009 National Waste Policy: Less waste, more resources"

Delivered by email to: nationalwastepolicy@environment.gov.au

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Executive Summary

Publishers have worked proactively for more than three decades on advancing recycling and environmental outcomes and we welcome the opportunity to comment on the Australian Government's waste policy discussion paper.

The shared approach engaging the Australian, state, territory and local governments, business and industry associations and non-government organisations is to be commended. Government working together at all levels in a co-ordinated fashion, in conjunction with industry, is seen as an effective way forward to advance waste policy, including recycling and the diversion of material from landfills.

Australian newspaper and magazine Publishers, together with Australia's newsprint manufacturer Norske Skog, have had a voluntary Product Stewardship Agreement on waste and recycling in place since 1992. Known as the industry's "National Environmental Sustainability Agreement" (NESA), it has been endorsed by all State and Federal governments. Its success can be seen in the increase in Australia's newspaper recycling rate 75% currently, which is close to world's best. When success is demonstrated it is considered more efficient to minimise red tape and directly address issues through consultation between government and industry.

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NewsMediaWorks is the not-for-profit organisation industry association of more than 1000 newspapers and websites across the region. This includes the vast majority of newspapers in Australia and New Zealand, as well as many English-language newspapers in South-East Asia and the South Pacific. We also have 90 subscribers who are suppliers and partners of the industry. NewsMediaWorks connects members and subscribers with the world's best industry practice through events and information as well as promoting awareness and understanding of newspapers within the community.



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Background

In Australia, recycling of newspapers is a success story with recycling rates among the best in the world at 75% in 2017. This figure excludes use and reuse around the home which can account for an additional 6.7%. The potential exists for the new energy from waste plants in Australia to increase this figure further.

Australian publishers' long history of supporting and advancing newspaper and magazine recycling which began with the establishment of the industry's Product Stewardship Organisation "The Publishers' National Environment Bureau" (PNEB). The PNEB formulated a five-year, voluntary Newsprint Producer/Publisher Group Plan for Publication Paper Recycling together with the Australian domestic newsprint manufacturer, Norske Skog in 1991 (then know as Australian Newsprint Mills). This Agreement was endorsed by the Commonwealth, State and Territories environment ministers meeting as the Australian New Zealand Environment Conservation Council (ANZECC) in 1992 and it has run continuously since then.

The current Agreement covers the period 2015-2020 and is known as the industry's National Environmental Sustainability Agreement (NESA). The Agreement is managed by NewsMediaWorks and Norske Skog. Members of NewsMediaWorks Environment Advisory Group include the following:

- News Corp Australia
- Fairfax Media
- Seven West Media
- Bauer Media

Principles that underpin successful recycling

Publishers acknowledge the principles that underpin waste management, recycling and resource recovery in a circular economy as they are outlined in the discussion paper: avoidance, improved resource recovery materials quality and collection systems, increased use of recycled material, better management of materials and improved information to advance waste management.



In addition, publishers have supported the following sound principles that underpin our Plan to advance recycling, these are:

- 1) **National Scope:** Sustainable sourcing and economic recovery and reuse of newsprint must remain market based and enacted on a national basis. Overly restrictive requirements, “red tape” or the implementation of state by state initiatives, will lead to confusion, contradictions, administrative problems and ultimately less desirable outcomes. Adequate economies of scale and operating efficiencies are essential to a sustainable outcome
- 2) **Market driven:** Newspaper and magazine recycling must be market driven to be sustainable. Inappropriate recycling legislation, targets or penalties result in economic distortions that lead to market failure and unsustainable outcomes
- 3) **No legislation is required:** The industry is voluntarily endorsing and extending an agreement format that has delivered world class paper recycling for some three decades and makes mandated action on our sector unnecessary
- 4) **Recovery and re-use are paramount:** The Publishers and Norske Skog Australia remain wholly committed to the sustainable production, recovery and reuse of newspapers and magazines
- 5) **Optimum Source Separation:** To achieve the optimum quality and utilisation of recovered newspapers and magazines source separation is the preferred method of collection. It minimises contamination and improves value to Local Governments and processors.

These principles were embedded in the original 1992 Newsprint Producer/Publisher Group “National Environmental Sustainability Agreement”. The validity of these principles have become even more important as global recycling markets continue to re-align in response to the China import ban.



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Publishers' response to the six key questions raised in the discussion paper are as follows:

1. *Total waste generated in Australia is reduced by 5 per cent per capita by 2025.
Reduce total waste generated in Australia per capita by 10 per cent by 2030*

These goals provide a clear aspirational vision to all stakeholders and are supported to underpin Australia's future waste policy.

Other waste avoidance goals of information and infrastructure sharing are supported as they provide a logical framework to meet the waste reduction objectives. The halving of food waste by 2030 is an ambitious goal that may require some milestones to provide clear objectives along the way.

2. *80 per cent average recovery rate from all resource-recovery streams, following the waste hierarchy, by 2030*

The achievement of this goal is supported. Consideration of varying challenges faced by different sectors of the waste stream should be taken into consideration, for example some materials are inherently easier to recycle than others. Also, is reuse around the home to be counted, and similarly is energy from waste to be included in this target. Publishers would argue yes to both of these.

3. *30 per cent average recycled content across all goods and infrastructure procurement by 2030*

Average recycled content targets may be appropriate for some materials, such as infrastructure such as roads etc, but it would be very problematic for newspapers and magazines. Currently, newsprint manufactured in Australia has an average recycled fibre content of 30%. The average would of course be higher than this as imports can have up to 100% recycled content.

Evidence in the USA shows that in previous years in Massachusetts and Connecticut publishers went so far as to pay a recycled content fine as it wasn't possible to effectively source newsprint that met the mandated recycled content target. Many factors impact on the ability of publisher to meet such targets including scarcity of high quality recycled fibres and subsequent quality of newsprint itself.

Most importantly, a mandated recycled content target for newsprint would impact on



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the economics of recycling. Markets which can afford to pay well for fibre, such as fruit packing, kitty litter and home insulation, may find themselves short of quality fibre. Local Councils may have to accept lower prices for their recycled fibre if these high paying industries fail due to fibre shortages.

4. *Phase out problematic and unnecessary plastics by 2030*

Reducing plastic waste is becoming a community and government priority as the impacts of plastics on our environments, and in particular our waterways and oceans, becomes apparent. Publishers would support moves for phase outs but would caution as to the criteria applied to “unnecessary”.

5. *Halve the volume of organic waste sent to landfill by 2030*

This target would be most effective with realistically achievable milestones to measure progress along the way. Without these milestones marking out the expected journey 2030 represents a very far horizon.

6. *Fit-for-purpose and timely data to be available for individuals, businesses, and governments to make informed decisions*

Publishers support accurate and reliable information on which to base decisions to advance waste management and recycling. With this in mind Publishers have publicly provided accurate annual industry waste and recycling statistics since 1990.

Additional proposals relevant to address the current China Sword recycling issue

Improving collections. Source separation and review of garbage bin sizes

- a) Source separation. Recycling collections that pick up materials separately, known as “source separated” systems, are an effective solution to raising quality. Germany is looking to move in this direction and many authorities in the US are also considering it. It requires more infrastructure, collections and cost but the certainty of higher returns from quality recyclables is the reward. Trials would provide evidence of the effectiveness of this initiative. Markets previously unable to accept contaminated household paper may be able to review this decision.
- b) Introduction of smaller 120 litre bins has been shown to double contamination. For



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example, in the Hunter region recently a move from 240 litre garbage bins to 120 litre bins doubled recycling contamination to 15%. A review of the existing benefits/problems associated with smaller bins may be definitive in leading to policies that reduce recycling contamination. It may be that households could be allocated say 60 litres of garbage bin capacity per person to effectively manage the twin goals of minimising waste to landfill and achieving quality collected recyclables.

Sorting quality improvements. Increasing Australia's sorting quality by assisting MRFs to upgrade or building MRFs able to meet higher specifications would go a long way to helping resolve some of the issues.

Initially intermediate sorting in other countries may be seen by some as a key to meeting China's quality criteria. This of course increases costs but may provide a short term benefit.

Market development. In the medium to longer term, the development of markets is a key consideration despite being tried and failed for many years previously. A simple measure such as mandating the use of appropriately crushed glass to the correct standard in road base or landfill cover would go a long way to addressing the immediate issue around glass recycling which is unlikely to develop other sizable markets.

Waste to energy plants can provide a medium to longer term partial solution. Introduction of waste to energy facilities would allow Australia to avoid landfilling up to 80% of its waste. Contaminated recyclables would return value as energy rather than being wasted in landfill. Baseload power would be cost effectively provided to the electricity grid, displacing technologies with higher and more polluting emissions and effectively underpinning any transition to intermittent renewable technologies.

Recyclables that are contaminated and unable to find markets are being landfilled in Australia. This has a high cost, both in monetary terms and by using up valuable and difficult to replace landfill space as well as in wasting the value of the energy embodied in the material. Where interstate transport of these materials is concerned the added risk of road accidents and clogging of our transport infrastructure also exists.

Recently some recyclables such as flexible plastics, have been sent to Malaysia where waste to energy plants burn them. This is done at a cost, wastes transport resources and removes Australia's direct responsibility for managing its waste.



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Conclusion

Publishers note the timely importance of updating Australia's National Waste Policy and, with some exceptions, generally support the actions outlined in the discussion paper.

Areas of concern for publishers centre around the appropriateness of targets, in particular mandated recycled content targets. Publishers recommend that the current ability of proactive industries, such as our own with existing Product Stewardship agreements, be allowed to continue to work voluntarily and remain outside any legislated framework.

Publishers strongly support, and actively provide, fit-for-purpose and timely data that is publicly available to make informed decisions to advance waste management and recycling as outlined in the discussion paper. Our industry has been providing such accurate statistics since 1990. This provides an immediate benefit to identifying and addressing waste reduction opportunities.

Please direct any questions regarding this submission to:

Dr Tony Wilkins
Executive Director Environment
NewsMediaWorks
anthonywilkins@NewsMediaWorks.com.au
0413080789