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Your submission for this review:

Total Environment Centre makes the following brief comments on IPART's proposal to benchmark waste charges and publish comparative charges across all councils: 1. The proposal pushes waste charges into a homogenous arena when various councils are at differing stages of achieving recycling targets. This will occur by virtue of their being a benchmark and the inevitable council by council comparison reinforced by simplistic media attention. 2. The proposal does not connect directly to (and thus not adequately support) achievement of the government's waste and recycling strategy by an analysis of the costs and benefits of delivering the strategy. The recycling sector and local government are in a critical transition phase up to 2030 and does not need potential "dumbing down" pressures on costs. 3. An example of point 2 is the implementation of FOGO. How will this be anticipated and integrated by IPART into waste management charges in a way that does not deter FOGO? Clearly IPART does not know nor has it proposed a methodology that allows this to be effectively assessed at council level. Councils should tender for best practice, but will also feel under pressure to minimise costs. The best way to approach this is by competitive tender placing sustainable results meeting targets at the centre of the program. 4. Similarly education about waste separation for recycling and importantly avoidance is a key activity and IPART by setting a common benchmark (or excluding it all together) has not accounted for quality and effective cost of ongoing education. What is the appropriate cost to achieve the objectives? How does IPART recognise this? In conclusion IPART will, with its proposals, negatively interfere at a critical moment when NSW is trying to establish a genuine circular economy.