



xx July 2024

NSW Environment Protection Authority  
6 Parramatta Square  
10 Darcy Street  
Parramatta NSW 2150

Via email to: NSW EPA [wastelevyreview@epa.nsw.gov.au](mailto:wastelevyreview@epa.nsw.gov.au)

Dear Waste Levy Review Team,

**REVIEW OF NSW WASTE LEVY ISSUES PAPER – SUBMISSION FROM NETWASTE AND MEMBER COUNCILS**

Thank you for the opportunity to provide comment on the *Review of the NSW waste levy: Issues paper*.

All 25 NetWaste Councils re-iterate the Position Statement presented to the EPA on 23 November 2023 during the first stages of consultation:

***NetWaste Councils strongly and completely oppose any change in the waste levy that will extend the regional levy area to include any of the 25 NetWaste Councils. The NSW EPA Levy applied to any of our Councils would be highly detrimental to waste management and simply lead to community angst and resentment against both Local Council and the NSW Government.***

Any introduction of a waste levy to any of the NetWaste Local Government Areas will simply be another form of cost-shifting by the NSW government that will add to the cost of living, encourage illegal dumping and have minimal impact on resource recovery. It will have a detrimental impact on our local communities and cause disengagement in our communities with the goal of reaching a circular economy.

NetWaste and all member Councils agree that the levy boundaries should not be expanded as:

1. The EPA waste levy has demonstrably **failed to meet landfill diversion targets** set by the NSW Government.
2. Under the Waste Levy there has been **insufficient investment and promotion of recycling infrastructure** that provide genuine alternatives to landfill. As a result, whilst there has been some success in easy to recycle material (e.g. C&D waste), the levy has overall increased the costs of waste management and incentivised illegal dumping and rogue operators.

3. Over **half a billion dollars each year** is collected from the Waste Levy and diverted away from waste programs and into NSW Government consolidated revenue. The loss of revenue from the waste industry occurs at a time when there is a critical lack of waste infrastructure and insufficient alternatives to landfilling (hence why diversion targets not met).
4. The levy applied to NetWaste Councils will be nothing more than a **cost-shifting** exercise that will place additional financial burden on regional communities. The Waste Levy will act as no more than an additional tax with zero net benefit.
5. The EPA should focus on **higher order waste hierarchy principles** as set out in the *NSW Waste Avoidance and Resource Recovery Act 2001*, rather than simply applying a blunt instrument like the levy to disincentivise landfilling.
6. Landfill diversion must start with **product manufacture, Product Stewardship** and following the principle of a **circular economy**. These should be the priorities of the State and Federal Governments, rather than the “end of pipe” solution of pushing waste problems down to Councils and communities who can least afford the imposition of the levy.
7. NetWaste Councils already price their landfills to represent the cost to the current and future community, including recycling. Councils are acutely aware of the perverse impacts from the cost of waste disposal and must balance landfill price with accessibility to illegal dumping opportunities etc.
8. NetWaste Councils have already demonstrated their commitment to landfill diversion through extensive recycling and education programs. Already 10, (40%) NetWaste Councils are operating a kerbside FOGO/GO service.
9. The levy will produce an illegal dumping haven with irresponsible offenders targeting unstaffed and unlicensed landfills due to increased gate fees.
10. Councils in regional NSW already face significant challenges allocating human resources with appropriate skills to existing operations. An imposition of a State Levy with associated reconciliation and reporting is beyond the capacity of most Councils and demonstrates the lack of real understanding of regional economic and demographic capacity.
11. Expansion of the Levy boundaries is fundamentally breaking all good will and trust built between the NetWaste member Councils working collaboratively with State Government on agreed common ground project initiatives that works towards enhanced resource recovery and waste diversion from landfill. Obviously, the State Government needs to be reminded that NetWaste was a pilot regional waste group originally established on the base principle that all member Councils would work collaboratively toward meeting State based waste diversion objectives on the premise of not imposing a waste levy to our Local Government Areas as we are already disadvantaged by access to markets, geographic isolation to industry and service providers and propensity for illegal disposal in vast areas of our jurisdiction.

All 25 NetWaste Councils therefore:

1. Vehemently oppose the introduction of any NSW EPA Waste Levy into NetWaste Council LGAs and commit to lobbying political stakeholders to ensure this does not occur.
2. Recommend an immediate review of the allocation of revenue collected from the waste levy to achieve State Government landfill diversion targets and transition to a circular economy.
3. Recommend the EPA provide more resources and endorse legislative change into higher order waste management (e.g. Product Stewardship/Extended Producer Responsibility schemes) so that the solutions for waste management are not dealt with at end of life and simply passed to Local Councils to manage.
4. Recommend the EPA finalise the proposed NSW Waste Infrastructure Plan (including detailed analysis of capacity and accessibility constraints) as a priority so that infrastructure can be planned and built in appropriate locations.
5. Recommend the EPA commit to gain a better understanding of the issues facing regional communities and their waste management. Issues such as unsupervised sites, lack of weighbridges, small budgets, recruitment difficulties, increased distances and smaller population bases are all relevant and affect resource recovery.
6. Appropriate reallocation of funding to Regional Waste Groups to assist with meaningful on-ground infrastructure and project initiative enhancements needs to be directed to achieving full circular economy outcomes.

The position of NetWaste and the 25 member Councils, along with the issues described above, was presented to the EPA at the initial consultation phase in November 2023. The Issues Paper now refers to how the levy boundaries should be expanded, rather than if the levy boundaries should be expanded. NetWaste would appreciate some constructive consideration and dialogue including EPA site presence / visits to understand these issues prior to any levy review or policy being administered in the NetWaste region.


Yours sincerely,




Nigel Campbell  
**NetWaste Executive Officer**


The NetWaste Voluntary Regional Waste Group and Council Delegates:


Signed for and on behalf of NetWaste by its authorized delegate	
	
Signature of Regional Projects Coordinator	Signature of Regional Environmental Learning Advisor
Antony Cullen-Ward	Bill Tink
(Print) Name	(Print) Name


Signed for and on behalf of Council by its authorized delegate	
Signature of General Manager / CEO	Signature of Council Mayor
(Print) Name	(Print) Name





Signed for and on behalf of Council by its authorized delegate	
----- Signature of General Manager / CEO	----- Signature of Council Mayor
----- (Print) Name	----- (Print) Name


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----- (Print) Name	----- (Print) Name


Signed for and on behalf of Council by its authorized delegate	 <b>CENTRAL DARLING</b> SHIRE COUNCIL
----- <b>Signature of General Manager / CEO</b>	----- <b>Signature of Council Mayor</b>
----- <b>(Print) Name</b>	----- <b>(Print) Name</b>


Signed for and on behalf of Council by its authorized delegate	
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----- (Print) Name	----- (Print) Name





Signed for and on behalf of Council by its authorized delegate	 <b>DUBBO REGIONAL COUNCIL</b>
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<hr/> <b>(Print) Name</b>	<hr/> <b>(Print) Name</b>


Signed for and on behalf of Council by its authorized delegate	 <b>FORBES SHIRE COUNCIL</b>
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Signed for and on behalf of Council by its authorized delegate	 <b>GILGANDRA</b> SHIRE COUNCIL <i>Live &gt; Enjoy &gt; Grow</i>
----- <b>Signature of General Manager / CEO</b>	----- <b>Signature of Council Mayor</b>
----- <b>(Print) Name</b>	----- <b>(Print) Name</b>


Signed for and on behalf of Council by its authorized delegate	
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----- <b>(Print) Name</b>	----- <b>(Print) Name</b>





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<hr/> <b>(Print) Name</b>	<hr/> <b>(Print) Name</b>

Signed for and on behalf of Council by its authorized delegate	
 ----- <b>Signature of General Manager / CEO</b>	 ----- Jasen Ramien (Jul 18, 2024 18:10 GMT+10) <b>Signature of Council Mayor</b>
 ----- <b>(Print) Name</b>	Jasen Ramien ----- <b>(Print) Name</b>

Signed for and on behalf of Council by its authorized delegate	
----- <b>Signature of General Manager / CEO</b>	----- <b>Signature of Council Mayor</b>
----- <b>(Print) Name</b>	----- <b>(Print) Name</b>









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