AUSTRALIAN
LOCAL GOVERNMENT
ASSOCIATION

12 February 2020

Ms Kristin Tilley
National Waste and Recycling Taskforce
Department Agriculture, Water and the Environment

Via email: coagwasteexportban@environment.gov.au

Dear Ms Tilley,

The Australian Local Government Association (ALGA) is pleased to provide this submission to the National Waste and Recycling Taskforce for the purposes of its consultation on the Regulation Impact Statement for the Phasing out of Certain Waste Exports.

Local Government plays a critical role in Australia's waste and resource recovery system and as such is a key stakeholder in this consultation process. ALGA is the national voice of Local Government in Australia, representing 537 councils across the country. In structure, ALGA is a federation of state and territory local government associations.

This submission should be considered in conjunction with any submission made by State/Territory Local Government Associations and individual local councils.

ALGA was a co-author of the National Waste Strategy 2018 (with states and territories and the Australian Government), which aims to address Australia's 'waste crisis'. Australia's recycling rate is below that of most OECD countries, with around 37% of Australian waste being landfilled. The shortcomings in Australian waste management weigh particularly heavily on Local Government. Around 26% of Australian waste is Municipal Solid Waste (MSW) managed by local councils. Local Government receives no financial contribution from the manufacturers of the products from which the waste arises. Consumers have limited choice in avoiding overpackaged goods. Collecting, treating and disposing of Australian MSW costs Local Government a conservatively estimated $3.5 billion annually.

Recommendations

1. The Problem Statement should more clearly acknowledge the overarching problem: Australia landfills around 37% of its core waste. The quantity of Australian waste that is exported is a small fraction of total waste. Measures addressing the full scale of the issue will achieve economies of scale.

2. The Objectives should include ensuring the impact of the ban does not fall inequitably on Local Government and its ratepayers. The cost of managing Municipal Solid Waste is borne almost entirely by Local Government. Better Product Stewardship is required to ensure the food and beverage industry and other manufacturers produce packaging that is less wasteful and more easily recycled in order to reduce recycling costs or landfilling.

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3. The Options, as framed, do not sufficiently take into account the current rollout of the National Waste Policy 2018 and the National Waste Action Plan, which encompass measures to increase Product Stewardship programs, address infrastructure gaps, grow markets for products containing recycled material, increase consumer education, set new standards and derive better data and research. The Action Plan has been agreed to by the Meeting of Environment Ministers (MEM), and so should be considered the status quo. On the other hand, Option 2(b) appears to be a summary of the Action Plan so is not really an 'option' (which also makes Option 2(a) redundant). Therefore, the Options might be reframed, with new sub-options for Option 2, in the following way:

Option 1. The status quo: NO export ban, but within the context of the Action Plan ratified by MEM and currently being rolled out;

Option 2. The Action Plan ratified by MEM (status quo), PLUS the export ban, and within this:

Option 2(a): the Action Plan:

- with the export-ban timetable changed to synchronise with Action Plan/APCO timetable; and
- original COAG definitions for bans on paper and plastic.

Option 2(b):

- as for 2(a);
- but with amended bans for paper and plastic.

Option 2(c): the Action Plan:

- with Action Plan timetable changed to synchronise with export ban timetable (and Action Plan's 'actions' more clearly developed, given compressed timeframe).

Option 2(d):

- as for 2(c);
- but with amended bans for paper and plastic.

The rationale for these recommendations is outlined in the attached submission, which responds to the questions posed by the Consultation Regulation Impact Statement.

Please contact Roz Chivers at roslyn.chivers@alga.asn.au if you would like to discuss this submission further.

Yours sincerely

Adrian Beresford-Wylie
Chief Executive

AUSTRALIAN
LOCAL GOVERNMENT
ASSOCIATION

Submission to the National Waste & Recycling Taskforce

In response to the Consultation Regulation Impact Statement – Phasing out Certain Waste Exports

12 February 2020

RESPONSES TO CONSULTATION QUESTIONS

Questions relating to the 'Problem' statement

1. Do you agree with the problems that have been identified?

It is agreed that reliance on waste exports has made Australia's waste and recycling system vulnerable to changes in international markets. Also, that Australian waste management will benefit from an increased capacity to handle waste currently exported. However, the 'problem' faced by the Australian waste sector does not begin and end with the relatively small proportion of Australian waste that is exported. Australia's waste and recycling system as a whole is significantly underdeveloped.

The breadth of the 'problem'

The RIS states that it will consider:

> *... whether a more cost-effective adjustment to global restrictions on waste exports can be facilitated by increasing domestic handling of waste material that is currently exported.*

Only a very small percentage of Australia's total waste generated is exported: in 2018-19 it was 6.5% of the total of Australian core waste. Around 37% of Australian core waste is landfilled. Therefore, Australia's overall poor recycling rate is the underlying 'problem', rather than the capacity to recycle the small exported component. The problem statement might more clearly acknowledge the overarching issue, and that the export ban is only one action among many set out in the *Waste Policy Action Plan 2020,* a broad, multifaceted response to Australia's poor recycling rate.

Utilising economies of scale to address the whole problem will make addressing the small export portion easier.

The export ban will nonetheless potentially play an important role in expediting this process and will create a market signal that will help spur private and public infrastructure investment and the development of markets for recycled products.

Source of banned exports not acknowledged

The lion's share of exports to be banned are mixed paper and cardboard, and mixed plastics. These predominantly come from Municipal Solid Waste (MSW) collection facilities managed or contracted by Local Government. The 'problem' statement must acknowledge this. Please see the answer to Question 3, below, for evidence of the large role Local Government plays in managing waste which will be impacted by the export ban.

Consumer expectations

The 'problem' statement says:

> *Current recycling collection methods and infrastructure mean it is generally not cost-effective to meet the new* [overseas] *standards.*

While true, exports nevertheless continue. In fact, exports have increased since the China Sword restrictions – to alternate markets that have no restrictions but offer negligible prices. The 'problem', therefore, is that overseas markets are the *only* possible destination for mixed waste other than landfill. Local Government is bearing the high cost of export, however, because rate payers expect their waste to be managed in an environmentally responsible way, not simply landfilled. The challenge for Local Government to meet 'consumer expectations' should be reflected in the 'problem' statement.

2. What effect do you think the problems could have on the waste and recycling sector, consumers and environmental regulators?

As stated above, overseas exports to alternate recipients are undertaken regardless of whether revenue returns are commensurate with collection and transport costs. As a result, the costs of waste recycling are already impacting Local Government and rate payers. However, banning the only markets available, without first establishing local alternatives, will likely see more paper and cardboard landfilled. Where recovered paper and cardboard are landfilled, kerbside separation becomes redundant, and will likely cease. This will mean the waste recovery/collection industry will be financially impacted and potentially left with stranded assets (kerbside collection infrastructure). Jobs will be lost, and landfills will be overstretched. Local Government will incur greater waste levies, and local communities will incur higher council rates reflecting an increase in waste management fees (an increase of up to $45 per household per annum[1]).

3. Do you have any information, analysis or data that supports characterising the impact of the problems identified?

The export ban will have a disproportionately large impact on Local Government. Around 26% of Australian waste is MSW managed by Australia's 537 local councils. Local Government receives no financial contribution from the manufacturers of the products from which the waste arises. Consumers have little choice but to buy over packaged or non-sustainably packaged goods. Product stewardship is nascent in Australia[2], and there are no regulations requiring manufacturers to produce less packaging or make it more easily recycled.

Local Government must bear the cost within the context of diminished general funding from the Commonwealth, rate capping in some jurisdictions and the need to provide a plethora of other local community services and infrastructure.

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[1] Centre for International Economics, 2019, *Microeconomic analysis of waste industry supply chains.* p2

[2] Corporate Waste Solutions, 2017, *Is Australia's Product Stewardship Act Effective?* https://www.fmmedia.com.au/sectors/australias-product-stewardship-effective/

Furthermore, the waste levies that local governments are charged by the states (which are aimed at making recycling more cost effective) amount to over $800 million per annum nationally[3]. Next to none of this sum, however, is reinvested in the capacity and capability of recycling infrastructure, which would assist Local Government in avoiding the levies. Waste levies, as they are currently managed, have little potential to drive further improvements to the recycling rate.

The cost of recovering the MSW stream is onerous. Collecting, treating and disposing of Australian MSW costs Local Government approximately $3.5 billion annually[4]. Unlike other streams of waste, MSW comprises a complex mix of waste types, and needs to be recovered weekly or fortnightly from individual homes safely and hygienically. The large variety of household waste materials and the large proportion that is currently not able to be recycled means kerbside recycling bins are highly 'contaminated' or contain significant amounts of unrecoverable content. This represents a great challenge to the sorting of recycled materials at Material Recovery Facilities (MRFs).

Capability shortfalls at MRFs mean that their output is largely mixed paper and mixed plastics. These mixed products are the least valued by Australian recyclers, who source almost exclusively from cleaner, commercial and industrial streams[5]. As a result, waste sorted by MRFs for recycling makes up the lion's share of waste exports[6]. It is therefore likely that the export ban will result in more waste going to landfill and greater landfill management costs. It has been estimated that the cost to Local Government and Australian households of the ban will be an extra $45 per year for additional landfill costs and lost export revenue. This amounts to $416 million per year across Australia[7].

4. **Are there any other problems that you think should be considered as part of the RIS? If so, please set out what they are, what effect you think these problems could have and how the problems should be addressed.**

   The *National Waste Policy 2018* provides a comprehensive picture of the overall 'problem' and its impacts. The RIS might make greater reference to this document. The Policy is the result of collaboration between all levels of government.

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[3] NRIC, 2019, Waste Levies White Paper

[4] ABS 2016-17 *Waste Account Australia, Experimental Estimates.* Over $14 billion is spent annually on waste collection treatment and disposal; and according to the *National Waste Report 2018* (p8) MSW comprises 26% of Australian core waste.

[5] Industry Edge, 2019, *Assessment of Australian paper & paperboard recycling infrastructure*

[6] Envisage Works, 2019, *Plastics infrastructure analysis update*

[7] Centre for International Economics, 2019, *Microeconomic analysis of waste industry supply chains.* p2

The *National Waste Policy 2018* and the *National Waste Action Plan,* discuss Australia's current:

- o lack of markets for recycled material and products containing recycled material;
- o lack of government procurement, that might incentivise such markets;
- o lack of recycling infrastructure capacity and capability;
- o lack of data/research on infrastructure capacity/capability;
- o lack of standards; and
- o lack of education for users of kerbside collection services.

To these points can be added:

- o lack of hypothecation of waste levies; and
- o lack of transparent data on waste levies claimed to be hypothecated by some jurisdictions.

Questions relating to 'Policy Objectives'

5. Do you agree with the policy objective as outlined?

It is agreed that environmental and human health protection through better waste management should be the policy objective. However, the second objective of ensuring Australia *'manages the risks of countries imposing waste import restrictions'* seems redundant given the ban will eradicate the need to 'manage' the risks by way of avoiding them altogether (i.e. value-added material only will be exported, not 'waste').

6. Are there any other objectives that you think the Commonwealth, state and territory governments should be pursuing in addressing the problems? If so, please set out what they are.

Additional objectives should be:

- o ensure local governments and their rate payers don't inequitably bear the costs of the ban;
- o spread costs across the waste chain, from production to recovery; introduce better Product Stewardship to avoid waste in the first instance;
- o ensure current kerb-side collection does not become economically unsustainable as a result of the ban;
- o position Australia to produce less waste and compete in both the domestic and global circular economies to improve the resilience of Australia's waste and recycling sector; and
- o responsibly manage resources and reduce reliance on virgin materials that are adding to already constrained landfills and associated environmental impacts.

Questions relating to Policy Option 1

7. **What is your role in the waste stream (producer of waste, collection, recycler, exporter)?**

   The Australian Local Government Association represents 537 local governments across Australia and seven state and territory Local Government Associations. Councils have a significant role in municipal and public-place waste-and-resource recovery. Councils organise collections, operate waste facilities – most commonly Material Recovery Facilities (MRFs) and landfills – and develop and deliver community waste education. Councils represent a significant potential market for recycled materials.

8. **How have waste import restrictions imposed by other countries impacted your activities?**

   Local governments and their ratepayers have been significantly impacted by contract changes and price increases resulting from China's National Sword Policy. Regional councils have been the hardest hit, with contractor price increases of up to $200 per tonne for kerbside collection. A lack of transparency in the supply chain has meant councils have been unable to substantiate the price increase. Long term contracts and a lack of competition and capacity in the processing market have meant councils have had little choice but to accept the price increases and pass them on to ratepayers.

   Import restrictions have resulted in contamination rates being enforced by MRFs, which has also added to costs. However, kerbside recycling contamination cannot currently be reduced to zero, because composite materials in packaging make it impossible to meet a contamination rate of 0.5 percent under the National Sword Policy.

9. **What would be the longer-term implications if similar import restrictions are imposed in other export markets?**

   Impacts on Councils will continue as more countries effectively close their doors to exported Australian material. Without alternative domestic pathways for reuse and recovery of that material, more material will be stockpiled, landfilled, or disposed of illegally. This will lead to significant environmental, social and economic impacts. Continued impacts will undo over a decade of waste-separation education programs and undermine any attempts to re-introduce such systems.

   Manufacturers of the packaging and products that enter kerbside recycling should be required to design for waste avoidance, reuse, repair and recyclability (secondary processing and remanufacture) or contribute to the increased cost of recycling their packaging and products. Ratepayers cannot continue to bear the cost of poor design and poor material choice by packaging manufacturers. Local Government must manage in a fiscally responsible way and balance multiple competing demands including the delivery of large range of vital community services and infrastructure. The financial implications of the bans in the short and long term may result in kerbside collection becoming financially unviable ultimately increasing the amount of waste going to landfill. This is contrary to the intent of the COAG waste export ban.

10. Are there other existing or future government or industry-led initiatives that are relevant to addressing the problem?

The *National Waste Plan 2018* and *Action Plan 2020* aim to address Australia's poor waste recovery and recycling rates.

- The *Action Plan* was developed by working parties comprising all levels of government and industry delegates;
- The *Action Plan* includes an extensive list of government and industry-led initiatives;

However, the waste ban was a last-minute addition to the *Action Plan and* was not formulated in accord with the timeframe of the waste ban. Either the *Action Plan* should be expedited in line with the timetable for the export ban, or the export ban timetable amended in line with that of the *Action Plan*. Further, some of the actions within the *Action Plan* are 'aims' not 'actions' and need to be better developed. Finally, governments need to commit funds to implement the *Action Plan.*

11. Does the status quo achieve the policy objectives?

No, and the subsequent options, as framed, are problematic. The following discussion raises points about the limitations of the CRIS options, and then provides an alternative framing for them:

Options as set out in CRIS:

- **Option 1 (status quo)** purports to be a business-as-usual option. But it does not sufficiently consider the current role-out of the *National Waste Policy 2018* and the *National Waste Action Plan.* Both documents have been agreed to by Meeting of Environment Ministers (MEM) and so suggests a change to business as usual is currently in train.
- **Option 2(a)** is the ban but without interventions to increase recycling / build markets. This option is, however, redundant because the *Action Plan* agreed to by MEM suggests there will in fact be interventions to increase recycling / build markets.
- **Option 2(b)** consists of the interventions that are already part of the *Action Plan*:
  - development of standards;
  - product stewardship;
  - improved data collection;
  - consumer education;
  - procurement targets; and
  - industry assistance.

Alternative options:

- **Option 1.** The *Action Plan* now accepted by MEM (status quo) – **minus the export ban**
- **Option 2.** The *Action Plan* now accepted by MEM (status quo) – **plus the export ban**
    - **Option 2(a):** the *Action Plan:*
        - with export-ban timetable changed to synchronise with *Action Plan* /APCO timetable; and
        - existing definitions for bans on paper and plastic.
    - **Option 2(b):**
        - as for 2(a);
        - but with redefined bans for paper and plastic.
    - **Option 2(c):** the *Action Plan:*
        - with *Action Plan* timetable changed to synchronise with export ban timetable (and *Action Plan's* 'actions' more clearly developed, given compressed timeframe).
    - **Option 2(d):**
        - as for 2(c);
        - but with redefined bans for paper and plastic.

12. Are current laws and government policies sufficient to address the problem?

Government policies to address the problem are expressed in the *National Waste Policy 2018* and its *Action Plan 2020.* If sufficiently funded, in principle yes – the policies are a strong step in the right direction. Major components of the *Action Plan* are actions addressing:

- infrastructure development;
- industry assistance;
- procurement targets;
- product stewardship;
- consumer education;
- development of standards; and
- improved data collection.

Increased product stewardship is a fundamental component of the *Action Plan.* To date, product stewardship has been underutilised or unused entirely. ALGA provided a submission to the review of the *Product Stewardship Act* in 2018. The Government is yet to respond to that review. We recommend the Government prioritise completion of that review and any legislative response emerging from it. ALGA calls on the Australian Government to provide some meaningful leadership and investment in this space.

See also answers to Questions 10 and 11 above.

13. How effective are industry-led initiatives for addressing the problem?

Product stewardship schemes offer a solution to the current waste crisis. By internalising the environmental costs involved in managing products throughout their lifecycle, producers are incentivised to use resources more efficiently. Product stewardship schemes should therefore be put in place for all products that generate waste and send valuable resources to landfill. This is an aim of the *Action Plan* (see its Actions 3.1 – 3.5).

Ideally, product stewardship schemes will be mandatory. The advantage of mandatory schemes is that they create a level playing field: the costs and responsibilities are known and consistent in a competitive market and shared equally among producers of waste products.

The Australian Packaging Covenant

Because it is a voluntary scheme, the Australian Packaging Covenant faces several challenges. The Australian Packaging Covenant Organisation (APCO) may not be able to enlist the support of the entire packaging industry, smaller brands in particular; and there will be a significant number of industry non-signatories. There are also issues around states and territories not having the capacity to create a sufficiently strong incentive for those free riders to opt into the Covenant (for example, through their legislative responses to the Packaging NEPM and their capacity to penalise non-compliance).

There is also uncertainty around APCO's capacity to guarantee all its signatories will comply with its program. There are also issues with the term 'recyclable': this is still an emerging science, and the recyclability standards used within the APCO PREP may not make plastic packaging recoverable at an adequate proportion of Australian MRFs.

Therefore, mandating membership of APCO should be considered. Actions 3.1 – 3.5 of the *Action Plan,* which relate to Product Stewardship, should be expedited, as should the implementation of a response to the review of the *Product Stewardship Act*. Further, APCO targets should be more ambitious, and their implementation should be placed on the same timeline as the ban.

See also the answers to Questions 10 and 11 above.

14. Are there any other benefits or costs associated with the status quo?

No benefits or costs have been outlined in the RIS for the status quo.

15. Do you have any suggestions that could help a future education campaign? What kind of information should be provided as part of an education campaign?

There is great scope for the Australian Government to develop and deliver national education campaigns for waste avoidance, reuse and repair as well as reducing over-consumerism. Waste avoidance and minimisation education is not dependent on the collection systems that may vary between jurisdictions. As discussed above, the Australian Government has the power to mandate product stewardship schemes and to then educate the community about how to access those schemes.

Questions relating to Policy Options 2(a) and 2(b)

16. Are there any other benefits or costs or unintended consequences associated with Options 2(a) or 2(b)?

The assertion made in the RIS's Option 2(b) is correct:

> *Targeted government interventions must address the inability of existing recycling infrastructure and markets to absorb the material that would have been exported.*

The interventions outlined for Option 2(b) are very high level, and no cost / benefit analysis is provided for them. This is a significant shortcoming of the CRIS. It does not clearly identify who is likely to be affected by each regulatory option and assess the economic, social and environmental costs and benefits. The implications for Local Governments and the communities they serve are not stated beyond "financial implications for Australian households and businesses could arise from costs associated with disposing waste that was previously exported, such as costs from transport within Australia".

Whilst the broad areas for intervention are generally in line with those of the *National Waste Policy Action Plan* it is not clear whether the interventions are the same or go beyond those of the *Action Plan.* Given the timetable for the ban, the interventions will need to be additional to those in the Action Pan. If they are not, a proportion of kerbside collection will become unviable. This in turn would create very significant:

- social impacts (job losses);
- local financial impacts (stranded assets, higher waste levy payments);
- health impacts (i.e., stockpiling); and
- environmental impacts (more landfills opened, more illegal dumping, increases in greenhouse gas emissions).

17. Under a prohibition or restriction on waste exports, how should the ban be designed to achieve the policy objectives while minimising costs and adverse impacts?

It is vital that there be a greater integration / synchronisation of the ban and *Action Plan.* This will involve either changing the ban timeframe to match that of the Action Plan, or alternatively, changing the Action Plan timeframe to match that of the ban. Further, it is necessary to redefine (a) the plastics permitted to be exported (i.e., allow clean low contaminated sorted material to be off shored), and (b) the paper permitted to be exported (i.e., allow clean low contaminated sorted material). Importantly, more funding commitments need to be made for the *Action Plan* to ensure it achieves its objectives.

18. Under a prohibition or restriction on waste exports, do you consider there are waste materials that should continue to be eligible for export? Please provide details.

Waste that has viable export markets and/or the material meets internationally recognised export standards and specifications should not be banned. Some social enterprise MRFs sort, with very minimal contamination, plastic bottles by colour for export to the EU for a sustainable return.

Under the ban, this would end, jeopardising the jobs of workers. Waste material streams that have insufficient volumes to justify domestic secondary processing should be exempt from the ban if they can prove responsible export, otherwise this material will be landfilled, if not phased out.

19. What sort of penalties should apply to businesses that fail to comply with an export prohibition or restriction?

The CRIS should examine the impact of how the ban will be enforced and the cost of enforcing the ban to stop an uneven playing field developing between those operators that do the right thing and those that don't. Businesses should be adequately supported / resourced to ensure they are able to comply in the first instance. If they are not supported, they cannot be expected to comply, and thus should not be penalised in the short term.

20. What kind of costs (including compliance costs) or loss of income will businesses face to comply with export prohibitions or restrictions? Will these costs be passed on and if so to who? Please provide data where possible.

Capability shortfalls at MRFs mean that their output is largely mixed paper and mixed plastics. These mixed products are the least valued by Australian recyclers, who source almost exclusively from cleaner, commercial and industrial streams[9]. As a result, waste sorted by MRFs for recycling makes up the lion's share of waste exports[10]. It is therefore likely that without interventions, the ban will result in more waste going to landfill and greater landfill management costs. It has been estimated that the cost to Local Government and Australian households of the ban will be an extra $45 per year for additional landfill costs and lost export revenue. This amounts to $416 million per year across Australia[11].

The industry should be adequately supported/resourced to ensure it has alternate markets for recovered waste and can afford to access these. If not, Local Government will be forced to pass on costs to rate payers or will find it impossible to meet the cost of separated kerbside collections (recycling bins) and therefore send it to landfill.

21. How do recycling service providers manage changes of law in their contracts? What costs could introducing a prohibition or restriction on waste exports trigger under these contracts? How would service providers seek to manage these costs? Please provide details.

Contracts for recycling collection and processing provide Local Government with certainty and access to volume. An export ban will have significant implications for the many hundreds of local government contracts. Without new infrastructure capacity or markets, MRF operators could use change-of-law clauses to register the materials affected by the ban as contamination. Councils are likely to be forced to accept much higher gate fees or send kerbside recycling to landfill. Furthermore, significant legal costs and staffing resources will be incurred by councils to undertake contract negotiations with waste service providers in preparation for the export ban.

If effective interventions are introduced to support the development of processing capacity and markets, it is likely that there will still be a short to medium term period (up to 5 years) in which materials are sent to landfill. There are significant barriers for investment in new processing infrastructure including high labour costs, high electricity costs, water availability, and access to finance. The cost of building this processing capacity is likely to be passed on to councils via processing contracts.

Regulatory impacts are often supported by funding to industry, with little reference to the financial commitments already in place via local council service contracts. Grants and other funding provided to industry ought to be conditional on reduced costs flowing through to local councils.

It is also possible that too many new processing facilities will be built to process high value materials, which could lead to a shortage in feedstock. Alternatively, an oversupply of feedstock for less valuable materials and increased demand for domestic processing will result in the value of the feedstock plummeting and the cost of processing increasing. Either way the costs would be transferred to Local Government.

Given the very limited number of vertically integrated recycling processing providers, a ban on the export of sorted and baled paper and cardboard in particular will potentially impact on the level of competition in the Australian market. Potential negative effects of the ban on competition should be analysed by the ACCC.

The final RIS should provide more detail on these issues and how they could be mitigated by government interventions.

22. What impacts will Options 2(a) or 2(b) have for relevant markets, including impacts on prices and competition?

The RIS itself should detail and analyse impacts on relevant markets, including price and competition. While some information on impacts has been supplied above, detailed and concerted research is required.

23. Do you consider there is existing Australian markets and infrastructure have capacity to respond to a prohibition or restriction on waste exports? If not, please provide details such as:

- **a) What is the infrastructure capacity gap that will need to be filled?**
- **b) How long will it take to commission the infrastructure?**
- **c) What is the cost of building the infrastructure and who will bear this cost?**

The *National Waste Policy* and its implementation *Action Plan* acknowledge that existing Australian infrastructure does not have adequate capacity and capabilities, with or without the export ban. It therefore contains actions requiring research into industry capacity to be undertaken by 2020:

> *Action 1.6 Analyse and report on national infrastructure capacity requirements with a particular focus on plastics, paper, glass and tyres.*

Therefore, the answer to all these questions should be the subject of thorough, methodical research, independently undertaken for or by the authors of the RIS.

24. **Do you believe that the combination of costs and benefits under Option 2(a) are superior to other options?**

    There are no monetarised costs given, only benefits and impacts in very general terms. Thus, no quantitative comparison can be made. These general descriptions, however, are likely to be inferior to Option 2(b).

25. **Do you believe that the combination of costs and benefits under Option 2(b) are superior to other options?**

    There are no monetarised costs given, only benefits and impacts in very general terms. Thus, no quantitative comparison can be made. These general descriptions, however, are likely to be superior to Option 2(a). There needs, however, to be a full cost-benefit analysis of a range of additional options within Option 2(b). These options should be for different schedules for the ban, and with different definitions of what is being banned. Please see the answer provided for Question 11, above.