SSROC submission to the Australian Government Productivity Commission's Circular Economy Enquiry

October 2024

1 Introduction

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of 12 councils spanning Sydney's southern suburbs, eastern suburbs, CBD, and inner west and covering a third of the Greater Sydney's population, over 1.8m people. Our Councils manage around 655,000 tonnes of household waste each year, which is about 20 per cent of all NSW household waste.

SSROC provides a forum through which our member councils can interact, exchange ideas and work collaboratively to solve regional issues and contribute to the future sustainability of the region. We advocate on behalf of our region to ensure that the major issues are addressed by all levels of government. Our current focus includes the environment, procurement, waste, and planning.

In this submission, we have responded to the four information requests in the Productivity Commission's *Opportunities for a Circular Economy Call for Submissions*. We have also summarised our recommendations below which are further detailed in this submission.

2 Summary of Recommendations

To design out waste, support the reuse and repair sector, and provide the necessary facilities and systems to transition towards a circular economy we recommend:

I. **Tougher regulation on products imported** into Australia that are made from materials that cannot be easily repaired, dismantled or recycled, including product packaging.

II. **Creating a Repair Star Rating for products** similar to the Australian government led Energy Star rating and the Water Efficiency labelling and standards (WELS). This needs to be supported by a national behaviour change program focused on buying repairable and durable products.

III. **Introduction of income tax deductions or other fiscal repair incentives**. To incentivise consumers to undertake repairs and boost jobs in the repair sector.

IV. **Acting on the Productivity Commission's previous recommendations on the Right to Repair** to ensure that consumers can legally repair goods at a competitive price at a repairer of their choice.

V. **Transitioning to regulatory or co-regulatory product stewardship (PS) schemes** because the majority of existing and emerging PS schemes in Australia are voluntary, without regulation they cannot get adequate market share and effect the level of system change needed to progress towards a circular economy.

VI. **Implementing a whole of government approach to enable economic transformation to a circular economy.** In Australia, circular economy approaches and projects have tended to be confined to environmental sections of government. We need all government departments especially Treasury to be collaborating on this substantial change to the Australian economy. Senior executives at all government departments should have to report on circularity performance objectives relevant to their agency, to ensure accountability.

VII. **Developing national policy to support circular economy activities, supported by a funding package and a team of staff.**

VIII. **Investment and planning for designated infrastructure for reuse, remanufacturing of materials, as well as increasing support for waste processing and recycling infrastructure.**

IX. **A national behaviour change program focused on key consumer behaviours needed to support a circular economy** (e.g. make do with less, borrow/rent, source second hand, prioritise durability, repair, reuse and pass on).

3 Circular Economy success stories and measures of success

SSROC manages over 50 joint contracts for our councils. When commencing a new joint procurement for a product category, part of our procurement strategy is to consult with our member councils on the main sustainability and circularity risks and opportunities for that product category. For example, is the purchasing of a new product necessary or could it be avoided through renting/ leasing models? IT equipment or office furniture for instance can be rented instead of purchased.

In tender specifications for products, we include requirements for the durability and repairability of products, the avoidance of virgin materials and single use packaging. We seek commitments and opportunities to source products that use recycled content, reduce emissions or close the loop on materials. Often, end markets are not developed enough to close the loop on new materials at the time of tendering which can make evaluating circularity difficult. However, SSROC has successfully encouraged suppliers to offer emerging materials, products or services to improve circularity by including innovation clauses in our contracts. This encourages suppliers to continue to look for improvements over the life of a long-term contract.

SSROC has produced sustainable procurement resources for councils that include a focus on circularity principles. These include short e-learning modules on sustainable procurement, that explain the concepts of circular economy and circular procurement, as well as resources on sustainability criteria, clauses and metrics in procurement and case studies. They can all be found at: https://ssroc.nsw.gov.au/sustainable-procurement/

SSROC has had several projects that have effectively kept resources within the productive economy by extending the useful life of materials and products, including:

Paving the Way – SSROC identified recycled crushed glass (RCG) as a priority material due to the high kerbside tonnages collected in our region,[1] high processing cost,[2] limited end markets[3] and a growing body of data supporting the viability of RCG as an alternative to natural sand in civil works. SSROC started this project by collaborating with council civil engineers, Transport for NSW and AUS-SPEC to address any concerns about changing standard approaches to asphalt mixes for road and developed factsheets on using RCG in asphalt. Then SSROC led a joint procurement approach with 16 Sydney councils to aggregate demand for RCG. This procurement has achieved the following benefits:

- Indicative volume of approximately 20,700 tonnes of RCG per year expected to create a market for around one-third of the glass collected through participating

[1] Approximately 30% by weight of all recyclables collected, as reported by material recovery facilities (MRFs). This equates to approximately 39,000 tonnes per annum in SSROC, and 59,270 tonnes per annum across all 15 participating councils.
[2] Current council recycling processing contracts are long-term gate-fee based, with increases linked to the Consumer Price Index (CPI). Gate fees are calculated by weight of all recyclables received at the MRF. If there are not sufficient end markets for recycled glass, councils will be required to pay higher gate fees, with the possibility that collected glass will not be recycled and then possibly disposed at landfill.
[3] About 60% (23,000t) of this collected glass can be recycled back into glass bottles and containers (*Australian Packaging Consumption & Resource Recovery Data*, December 2019), while the remaining 40% (16,000t) can be recycled into secondary uses, such as RCG for use in civil road construction.

councils' domestic kerbside collections, or the equivalent of 93 million glass bottles, without compromising higher-order recycling of glass back into beverage containers.

- Provides an innovative contract model that monitors and reports volumes of recycled materials, potential greenhouse gas emissions reduction (due to shorter transport distances for local glass versus natural sand from distant quarries), and contract performance.
- Provides media and community communications assets to reinforce the importance of source separation.
- Creates a framework for future joint council procurements to drive end markets for other recycled materials, with council demonstration projects under way for using recycled crumbed rubber in asphalt mixes.
- The panel contract is available for other Sydney councils to join at any time.

Mattress Recovery Contract for 11 councils with two suppliers to divert mattresses from landfill: Envirobeds and Soft Landings. This contract supports 20 full time equivalent (FTE) jobs, and a 75% recovery rate has achieved the following benefits:

- Envirobeds has hygienically refurbished 29,038 mattresses and recycled 43,556 mattresses. Steel and foam from mattresses are recycled or used for fishing spears (steel) and pet beds (foam).
- Soft landings have recycled 87,115 mattresses where the steel, foam and timber have all been recycled.

SSROC member councils also have many examples of successful projects including:

- Providing free or low cost repair workshops to residents to help keep materials in use.
- Educating the community about ways to avoid waste, reuse, upcycle and repair products through workshops, events and online materials.
- Trialling reusable takeaway food containers in restaurant precincts.
- Providing small grants for local circular economy projects and accommodation grants that provide reduced rents for sustainability focused start-ups and creative organisations; as well as Sustainability Hubs focused on reuse and repair. Examples include the Inner West Sustainability Hub, Randwick Council's Saturday Circles and the City of Sydney's grants programs.
- The Bower's Rehoming Service which connects unwanted goods in good condition with households in need: this program is supported by 21 Sydney councils.
- All of our member councils offer drop off events and/or Community Recycling Centres collecting a range of household goods for recovery including e-waste, clothing, bikes, and hazardous materials.
- Some councils are now collection points for external organisations driving circular economy across reuse and repair, such as The Reconnect Project for digital waste.
- As part of the NSW Government Mandate, all of our councils will be rolling out a food only or food and garden organics collection service to households over the next decade and will be looking for opportunities to buy back compost products where quality and logistical needs can be met.

- SSROC and 10 of its member councils have a stormwater management joint contract with Total Drain Cleaning which captures waste removed from stormwater assets, separates organic-rich materials for the landscaping industry, recyclable packaging goes to a material sorting facility and water goes back into the sewer system; this contract achieves an 85% recovery rate. Many councils capture and reuse stormwater in rain gardens and other suitable areas.
- Eliminating single use plastics in Council operations and taking all staff on a journey of training and education to reduce waste and find alternatives for events, functions and operations at libraries and community centres.
- Some of our councils have started to engage staff in different council services on what circular economy means and how it can be applied to procurement, as often an understanding of circular economy opportunities can be limited to a section of council such as sustainability, waste or procurement teams. One of our member councils shared that including sustainability and circular economy objectives into senior executive key performance indicators has been helpful in encouraging leadership in this area.

.

Collaborations:

Progress towards a circular economy requires collaboration across different sectors, SSROC has been collaborating with Charitable Reuse Australia (CRA) on reuse and repair advocacy in partnership with the NSW Environment Protection Authority (EPA). As part of this partnership we also participated in the working group for *Measuring Reuse Activity and Impacts in NSW* study (the Study). It is an excellent example of a project that was able to measure the success and benefits of reuse activities through an evidence-based approach. The Study was informed by an earlier project by CRA and Monash University that included the development of National Reuse Measurement Guidelines that defined a standardised approach to collecting, interpreting, and reporting on reuse impact data. The Study captured data on reuse activities and volumes between 2022-23 from Australian charities, commercial and not-for-profit reuse and repair organisations using point of sale data, as well information on the number of volunteers and paid employment.

The Study showed that reuse generates 25 times more jobs in NSW than recycling per tonne and saves the NSW community $432 million annually. It showed that reuse organisations repaired an estimated 3,900 tonnes of items. The study also examined the sector's evidence of considerable employment benefits, generating approximately 1,535 FTEs, including 348 FTEs for individuals facing barriers to employment and 3,306 FTEs of volunteer value.

3 Priority opportunities to progress the Circular Economy

Our 12 member councils represent a densely populated part of Sydney and are seeing growing volumes of unrecyclable and hazardous household products placed in kerbside bins and in bulky clean up collections. The majority of products presented in bulky clean up collections are not recoverable for reuse or recycling, with the exception of metals and some types of e-waste. As consumption grows the current household waste collection system becomes more unsustainable.

Interventions are desperately needed to improve the durability, repairability and recyclability of products before end-of-first use and disposal decisions. Local governments are one stakeholder in the value chain, but there are a number of priority actions upstream to design-out waste, support the reuse and repair sector, and provide the necessary facilities and systems to transition towards a circular economy:

I. **Tougher regulation on products imported** into Australia that are made from materials that cannot be easily repaired, dismantled or recycled, including product packaging. Products made in Australia should also meet these standards without sacrificing local innovation or manufacturing.

II. **Create a Repair Star Rating for products** similar to the Australian government led Energy Star rating and the Water Efficiency labelling and standards (WELS). A repair star rating would help inform and empower consumers to choose more repairable products and incentivise manufacturers to design products to be more repairable and durable. Like WELS, a Repair Star Rating would need to be complemented by investment in consumer rights and education materials, and for manufacturers and brands to maximise the effectiveness of the new labelling system.

III. **Introduction of income tax deductions or other fiscal repair incentives**. To incentivise consumers to undertake repairs and boost jobs in the repair sector, Australia could introduce tax income deductions where taxpayers could claim a fixed percentage of the cost of getting large household appliances like whitegoods and furniture repaired. This has been operating in Sweden where 50% of the labour cost for repairing whitegoods can be claimed as a deduction on income tax returns. Other international examples include multiple models of repair bonuses across Austria, France and Germany, and the French Repair Fund[4].

    We recommend that economic analysis of introducing tax income deductions for repair is undertaken as a first step, and that this analysis should investigate what product categories deductions should apply to and what education support would be needed to ensure successful implementation. This economic analysis could also look at other fiscal incentives that would help accelerate repair in Australia.

    SSROC is interested in trialling a repair bonus incentive scheme in our region and would be happy to discuss this further with relevant stakeholders.

IV. **Acting on the Productivity Commission's previous recommendations on the Right to Repair** to ensure that consumers can legally repair goods at a competitive price at a repairer of their choice.

V. **Regulation of product stewardship (PS) schemes** – majority of existing and emerging PS schemes in Australia are voluntary, without regulation they are not able to get adequate market share and effect the level of system change needed to progress towards a circular economy. Regulatory or coregulatory PS schemes are needed to force producers to take responsibility for the products they place on the market, and help improve how products are designed, manufactured, repaired and recovered over their entire lifecycle. We highly recommend that the Federal Government prioritises changing to a regulated scheme for batteries, mattresses and clothing and reviews other existing schemes that would benefit from moving towards a regulated model. A PS scheme is also needed for household electrical appliances including whitegoods; this could be achieved through expansion of the National Television and Computer Recycling Scheme (NTCRS) to include all household electronic products, or through a new scheme for household electronic products. Action on stewardship of electrical products is really lacking, with little progress since

[4] More information can be found at: https://repair.eu/news/there-is-life-on-mars-financial-incentives-to-make-repair-affordable/#:~:text=The%20VAT%20reduction%20on%20repair%20in%20Sweden&text=In%202016%20Sweden%20reduced%20its,back%20to%2012%25%20in%202023.

the February 2022 consultation on NTCRS and the more recent 2023 consultation on Wired for Change Scheme.

VI. **Whole of government approach to enable economic transformation to a circular economy.** In Australia, circular economy approaches and projects have tended to be confined to environmental sections of government. We need the Australian Government Treasury to be leading this substantial change to the Australian economy in collaboration with all government departments and with assigned staff and resources in relevant Federal and state agencies to progress it. Leadership at a Federal Government level, could also lead to greater involvement of Treasury and Planning departments in each state of Australia.

VII. **Developing national policy to support reuse and repair activities, supported by a funding package and a team of staff dedicated to supporting and expanding the repair and reuse economy across Australia.** International examples of this include Wales, which has ten dedicated government funded staff to support reuse and repair activities, as well as national policy and funding commitments, this level of investment has led to a huge increase in the amount of repair cafes in the country[5].

In addition, the Welsh Government's national policy 'Beyond Recycling Strategy' aspires to move towards a "universal cultural of reuse, repair and remanufacture within our communities and the Welsh Government's programme for Government 2021-2026 commits to develop 80 repair and reuse hubs in town centres"[6]. They have defined a universal culture of repair and reuse as having seven key aspects including:

- People and organisations are aware of the environmental, social and economic benefits of repair and re-use.
- Repair and reuse services are accessible to everyone.
- Repair and reuse behaviours become the default choice for all citizens, business and public sector organisations in Wales.
- Infrastructure is in place to support repair and re-use initiatives.
- Individuals and organisations have the necessary skills, training and support to repair and re-use items.
- Citizens are entitled to a right to repair.
- Businesses/manufacturers have adopted repair and re-use business models.

A large proportion of repair activities in Australia rely on volunteers such as repair cafes, shared tool libraries (such as The Sydney Library of Things), and similarly charities rely on volunteers to sort and tag reusable items in Op Shops across the country. There is a need for paid positions both nationally and in every state of Australia, to help build capacity, support existing activities, develop policy with key stakeholders, address infrastructure and training gaps and scale reuse and repair activities. These positions could also coordinate a dedicated grant program for reuse and repair initiatives. There has been substantial investment in recycling at every government level for decades; similarly, we need to invest in repair and reuse to keep materials in circulation.

[5] More information can be found at: https://wcva.cymru/repair-cafe-wales-from-grant-to-government-staple/ and https://repaircafewales.org/about-us/

[6] See Towards a Universal Culture of Repair and Re-use at: https://wrapcymru.org.uk/sites/default/files/2024-06/Towards-Universal-Culture-Repair-Reuse-Wales-Consultation-v1.pdf

Measuring Reuse Activity and Impacts in NSW showed that investment can be tied to measurable outcomes such as an increase in jobs, materials reused or repaired and diverted from landfill and carbon emission savings; as well as many examples of how volunteering in Op Shops and repair cafes has reduced isolation and built community.

VIII. **Investment and planning for designated infrastructure for reuse, remanufacturing of materials, as well as increasing support for waste processing and recycling infrastructure.** Infrastructure needs could support greater source separation of materials, collection and labour intensive processes like sorting, and scaling reuse and repair initiatives across Australia. Greater co-location of reuse, repair and re-manufacturing onsite at primary processing centres, such as MRFs, landfills/treatment facilities, should also be supported. In Sydney where co-location may be more difficult to achieve in high density areas, reuse and repair organisations such as op shops and repair services could thrive in retail centres. In NSW, no state agency is responsible for planning essential waste infrastructure or its delivery, let alone circular economy precincts. This needs to change and a central government agency at each state level needs to have the responsibility for planning and ensuring there is adequate waste, reuse, repair and recycling infrastructure.

IX. **A national behaviour change program focused on key consumer behaviours needed to support a circular economy** (e.g. make do with less, borrow/rent, source second hand, prioritise durability, repair, reuse and pass on etc.). Australians have high rates of donating and passing on clothing[7], education is needed on renting, borrowing or buying second hand instead of new, basic repair skills, and if a new product is really needed then ensuring it is durable, repairable and recoverable at the end of its life.

4 Hurdles and Barriers to a Circular Economy

a) Lack of economic and policy levers to enable the change required

As transitioning to a circular economy requires major economic reform, Australia needs more economic and policy levers to create the systemic change to how raw materials are currently extracted, made into products, used for a short period and disposed. Australia's public and private investment in mining coal, steel and gas will mean that major changes to keep post-extraction resources within the economy will be met with resistance (as we are currently seeing with carbon reduction policies). However, net zero emissions targets and related policies can be easily adapted to include circular economy policies because extending a product's life through reuse, repair, remanufacturing of materials and closing the loop all reduce carbon.

Fiscal incentives for designing out waste, enabling and rewarding the reuse and repair of products are urgently needed to make a circular approach more cost-effective than a linear one; as well as tougher regulation to design out non-recyclable products.

b) Voluntary product stewardship schemes cannot effect systemic change

Voluntary product stewardship schemes, whilst having some benefits, cannot get enough of the market share to cover the cost of collecting and recovering products. Regulatory or co-

[7] See Keeping Clothes Out of Landfill Report https://research-repository.rmit.edu.au/articles/report/Keeping_Clothes_Out_of_Landfill_A_landscape_survey_of_Australian_consumer_practices/27092239?file=49503087

regulatory schemes are needed to force all manufacturers and relevant brands to contribute to the costs of enabling the reuse, repair, collection and recovery of their products at the end of life stage.

Currently, the collection and recovery costs of household goods are predominantly borne by local government, placed in a position to collect unwanted bulky or hazardous goods that cannot go in household bins to keep streets safe. Increasingly, councils are finding it difficult to fund the collection and recovering of the huge variety of household products unsuitable for bins including mattresses, whitegoods, batteries, textiles, e-waste (not covered under the National television and computer recycling scheme), polystyrene, soft plastics and whitegoods.

As waste volumes grow, councils are faced with two options:

a) Pay the high costs, and reduce other services to the community; or
b) Increase the domestic waste management charge, placing further burden on households to cover the costs.

A real example of this can be seen with mattress recovery which costs councils in our region approximately $50 per mattress unit (varies according to size) to collect and recover. In 2023-24, 11 Sydney councils recovered 159,709 mattresses; illustrating that in just one region of Sydney millions are spent on recovering one common household product. Despite over a decade of considerable effort from the Australian Bedding Stewardship Council through their voluntary scheme for mattresses, they have not been able to get adequate market share from local and international mattress manufacturers (the scheme asks for $10 per mattress unit contribution). This has meant that no councils in our region are receiving a financial discount or benefit from this voluntary scheme. Rate payers through councils are paying for the end-of-life costs for mattresses, rather than producers. If the Australian Government made this a regulated scheme, then funding could be raised to invest in recovery and more equitable cost-sharing arrangements with producers.

c) Inconsistent and inadequate reinvestment of state waste levies fees

Most Australian state and territories have imposed a levy on the cost of landfilling items as an economic driver to recover materials rather than landfill them. The management and reinvestment of this levy into waste, recovery and circular economy activities is inconsistent across Australia and represents a lost opportunity to invest in Australia's transition towards a circular economy.

In 2018-19, NSW reinvested only 11.5%[8] of Waste Levy revenue into the sector versus:

- 66% in Victoria applied to EPA/Sustainability Victoria or other bodies
- 50% in South Australia allocated to the Green Industry Fund
- 70% in QLD,
- 25% in WA
- 100% in TAS
- Neighbouring New Zealand achieves 100% reinvestment of their Waste Levy comprised of 50% allocated to councils, 50% allocated to Ministry of the Environment.

SSROC and Local Government NSW have been advocating for full hypothecation of the NSW Waste Levy for several years without success. In NSW, there is no state funding available to councils or businesses for waste and resource recovery services outside of competitive short-term grants, which limits innovation and the development of new circular economy proposals. Federal Government could work with each state government to set a

[8] The NSW percentage was correct in 2020 and from SSROC's *Legislative and Regulatory Reforms for Achieving a Circular Economy September (*2020), this may have changed since 2020.

minimum percentage of waste levy funds that must be reinvested back into national and state waste reduction targets and circular economy activities. This would re-focus the Waste Levy as a policy tool away from recycling, and forward towards net zero and circular economy ambitions.

d) Immature end markets for some materials or products

Government procurement can have an important role in stimulating end markets for materials to help close the loop. But for some materials there can be significant complexities and barriers to achieving this. For example, SSROC coordinated a Uniform Recycling Trial with eight councils and in that tender, we specifically asked the market for opportunities to buy back products made from recycled uniforms or textiles. Whilst there is some innovation and development in products made from recycled textiles such as insulation, pet bedding, office partition boards and bags, at the time of that procurement it was an immature market and there were not many relevant, ready-to-order products that could substitute for other products commonly purchased by councils. If that procurement had been timed with a facility fit out or upgrade it might have been easier to try a new product made from recycled textiles, but even then, councils need to ensure that any products made from recycled materials meet Australian standards, have been well tested, are durable and can be repaired easily.

The SSROC Paving the Way contract mentioned earlier has been highly successful but it is important to acknowledge that it took years four years of collaboration, education and testing before stakeholders were ready to use recycled crushed glass as alternative to virgin sand in asphalt mixes.

5 Governments' role in the circular economy

This submission has discussed a number of roles for Government in the circular economy. Key areas of influence for each government level are summarised below.

Federal government:

- A whole of government approach to economic and policy settings would be hastened by dedicating staff that are solely focused on circular economy activities and policy settings (see previous Welsh Government example). Given the size and distance challenges in Australia, we also need equivalent positions in every state of Australia.

- Treasury has a central role in analysing and then recommending to government what economic levers would help design out waste, scale reuse and repair activities and support jobs in Australia. As previously discussed, items like personal income tax deductions for repairs, repair bonus, and funding packages for the reuse, repair and remanufacturing activities should all be investigated. The Australian Government should amplify and heavily promote its 'ReMade in Australia' brand, so that it is a point of cultural pride.

- Treasury in collaboration with the country's trade and port bodies could investigate penalties for non-durable and unrecyclable products such as France's recent 10 Euro ($AUD16) levy on each item of fast fashion sold in the country[9]. Fast furniture and poorly made or unrepairable electronic goods could also be considered as suitable for a levy or penalty to account for the significant costs in recovering and/or disposing of these items.

- Fast-tracking the Minister's Priority List for extended producer responsibility (EPR) and regulating product stewardship schemes where voluntary schemes have not

[9] See https://www.abc.net.au/news/2024-06-12/calls-for-australia-to-follow-france-tax-ultra-fast-fashion/103965144

been effective in achieving market share especially for clothing, batteries, and mattresses. We need expanded schemes for household electronic items, as well as items that are really difficult to recover and often not built to last such as furniture (representing on average 30% of household bulky collection piles).

- Establishment of a Repair Star Rating for consumer products as previously discussed.

- Acting on the Productivity Commission's previous recommendations on the Right to Repair to ensure that consumers can legally repair goods at a competitive price at a repairer of their choice.

- Include circular procurement opportunities when procuring, using clauses relevant to the product category and sector.

- Senior executives at all federal government agencies report on their progress towards circular economy.

State Government

- Planning for infrastructure to support a circular economy. This includes ensuring that there is adequate infrastructure for reusing, repairing, remanufacturing and recycling goods; essential infrastructure to dispose of waste that cannot be recovered; and advanced preparedness for disaster waste from natural shocks and stresses or manmade disruptions. Currently, planning for essential waste infrastructure and for infrastructure for a circular economy is not a direct responsibility of any state government agency.

- Dedicated staff working on circular economy policy and initiatives and collaborating across state government agencies especially involving NSW Treasury, NSW Environment Protection Authority (EPA), NSW Department of Planning, Housing and Infrastructure (DPHI), NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW).

- Long term funded programs that support repair cafes, reuse hubs and increase access to affordable repair of products; as well as remanufacturing and recycling.

- Education for businesses and residents of NSW on ways they can support a circular economy.

- Circular procurement opportunities in all procurements, relevant to the product category.

- Senior executives at all state government agencies having to report on their progress towards circular economy.

Local Government

- Education of local residents on ways to participate in circular economy initiatives.

- Circular procurement opportunities in all procurements relevant to the product category.

- Supporting reuse and repair education and community workshops.

- Trialling circular economy initiatives relevant to councils that could be replicated in other parts of Australia.

- Senior executives at all councils having to report on their progress towards circular economy.

Thank you for this opportunity to contribute to the discussion. Please note that this submission has not been endorsed by SSROC's member councils due to time constraints. I will contact you should any issues arise as a result.

For any enquiries, please contact me by email.

Helen Sloan
Chief Executive Officer
Southern Sydney Regional Organisation of Councils