Accelerating SA's transition to a circular economy: South Australia's Waste Strategy 2025-2030.

Submission from the Product Stewardship Centre of Excellence
July 2025

Introduction

This submission is made on behalf of the Product Stewardship Centre of Excellence, an independent not-for-profit charity. The Centre exists to facilitate the avoidance and reduction of waste and create positive environmental and social outcomes through sustainable design, resource conservation, reuse, repair, and recycling. We also provide independent advice on product stewardship priorities to all levels of government.

Our submission seeks to highlight the critical importance of effective product stewardship in preventing and reducing waste, increasing recycling, reuse, repair as well as removing unsafe chemicals, conserving resources, decarbonising the economy and fast-tracking Australia's transition to a circular economy by 2030.

Effective product stewardship squarely places legal responsibility and accountability for the environmental and social impacts of products across their entire lifecycle solely on the producers, manufacturers, brands, importers and retailers placing products on the market. It is not this diluted notion of shared roles, which often fails to delineate who owns these impacts, be they solid and hazardous wastes at end of life, carbon emissions, or the specification of unsafe chemicals, finite resources or non-renewable inputs at the design and production stage.

Effective regulated product stewardship also provides an obvious step by step pathway for businesses and governments to operationalise the circular economy. Enabling essential systemic change and actions across the product lifecycle stages: design and production, consumption and post-consumption.

The Centre thanks the South Australian Government for the opportunity to comment on the Draft Waste Strategy 2025 -2030. It is a comprehensive effort that is to be commended and builds upon previous SA waste and circular economy strategies.

This submission takes each heading and discusses where effort and improvements might be had, specifically in relation to the Centre's areas of primary interest as they relate to the policy and practice of producer responsibility across the complete product lifecycle.

Background and context (p6)
Green Industries SA (GISA), the South Australian EPA and other contributors are to be congratulated on developing such a comprehensive draft strategy. We believe it is largely complete and has covered the most salient issues.

The global and domestic challenges (p7) highlight in brief the major issues faced and give rise to the actions briefly described on p 8. One area which is relevant and whilst dealt with separately in the same environment portfolio is in relation to regeneration and the role the new Biodiversity & Conservation Act in conserving regenerating nature and landscapes. It is worthy of mentioning and also linking with any circular economy actions which support biodiversity. The same might be said for water management and its conservation, as related to circular economy activities.

The draft states that the strategy identifies priority areas and actions that we need to address and implement in SA that will have the biggest impact, to accelerate our transition to a circular economy. We note that the document is large (88 pages) and with the number of initiatives, it may prove difficult to implement in the five-year time frame. It may be worthy of prioritisation through assessment of the impacts for each action in the final strategy.

Such prioritising would give a strong focus on policy levers that show they have multiple impacts. 50-55% of GHG emissions are attributed to how we manufacture, use and dispose of products. Australia is unlikely to meet its net zero aspirations unless it adopts more circular approaches to its economy and related activities, in addition to power generation and transport. It would be useful to identify the expected material, GHG impacts, along with any expected economic or social advantages of the many initiatives.

Progress to date (p10)
A significant and impressive tranche of achievements is listed. Schools' education and related activities seem to have been missed, influencing next generations to be sustainable should not be under-estimated. The national regulatory reforms that have been identified, whilst long promised, remain undelivered (packaging, photovoltaics, electronic goods, plastics, etc.) along with South Australia's Container Deposit System and food waste -related reforms such as regulated separate food waste collections from businesses are undelivered or only partly delivered (mass balance reporting, council reporting, and planning reforms to improve waste management).

The 2025 MSW target remains elusive, and the C&I target seems to have faltered compared to where it was estimated to be. The MSW target needs serious attention, and a step-wise change is required. This has proven difficult as the government refrains from allowing fortnightly waste collection and weekly organics for metropolitan councils. Contamination also remains an issue. Perhaps a new education campaign, backed up with incentives (prizes or rate relief) for better performance might encourage improvements.

What still needs to be addressed? (p13)
The over-production and over-consumption of material goods is still prevalent and is shown through the lack of progress in reducing waste generation per capita. This metric is unfortunately likely to increase again in the next data set as housing construction accelerates with government funding. An additional and contributing factor to this is the lack of effective product stewardship regulations (including their enforcement) at either a State or National level, and we have what might be described as a 'perfect storm'.

The other items identified are certainly in this category of 'still left to do'.

What's changed since 2020-25? (p14)
One aspect which was overlooked in this part is the Australian national work done by the Circular Economy Ministerial Advisory Group (CEMAG) and DCCEEW on circular economy policy, framework, and the recommendations during the last term of government, as well as the Senate inquiry on waste reduction and recycling policies. There are also several relevant reviews underway by the Productivity Commission (on the circular economy), and DCCEEW review of the Recycling and Waste Reduction Act.

While these changes are listed in various places, it remains relatively opaque as to how these changes have influenced this strategy or will influence it over coming years, however while it is useful to acknowledge these, it may be also useful to refer to submissions made by the SA Government to these reviews.

It would also be useful to acknowledge that change is constantly afoot (for example world trade and associated issues), and the Strategy will need to remain adaptive to these changes as they become evident or have impacts. How it should be responsive and adaptive hasn't been explained (i.e. Board reviews and governance, legislative review, public consultations, international alignment, risk management).

Strategic direction, sustainable development goals, circular economy framework and national waste policy actions (p15).

The Centre agrees with the five key factors, as described on page 15.

The SDGs expire in 2030, at the end of this five-year strategy, and it's noted that only SDG12 is mentioned from the total of 17 SDGs. The strategy has impacts across a number of SDGs, these are not limited to SDG12, it would be useful to link to others, with some commentary as to how SA has been achieving those related to waste, pollution, circular economy, etc. The other SDGs which would benefit from mapping against the strategy are:

- SDG13 Climate Action- Why? Because waste management and circular economy practices reduce emissions.
- SDG 14- Life below water- Why? Because improper disposal especially plastics is harming marine ecosystems.
- SDG 15- Life on Land- Why? Litter, landfill, illegal dumping impacts soil and terrestrial biodiversity.
- SDG 9- Industry, Innovation and infrastructure- Why? Waste strategies foster innovation in products, design and recycling.
- SDG8- Decent work- Why? The circular economy supports jobs in logistics, recycling, materials recovery, repair, design etc.
- SDG 6- Clean Water and Sanitation – Why? Poorly managed waste contaminates soil and water, including from chemicals such as PFAS etc.
- SDG 11 Sustainable Cities and communities Why? Urban waste management is central to creating liveable resilient cities. Community drop-off is an important aspect to this as well as regulatory instruments such as producer responsibility, targets etc.

Greater alignment with SDGs would assist with measurement and communication more broadly to the community rather than focussing on waste and circular economy. It would also enhance the systems thinking approach already evident, as various interventions highlighted influence and impact other goals.

The CSIRO work '*Australian material flow analysis to progress to a circular economy'* from 2024 (based on 2019 data) actually maps some of these against the circular economy objectives.

Better alignment with SDGs will assist with performance measurement, policy clarity improving communication and aid in alignment with international efforts.

It is noted that the National Waste Policy Action Plan will / is aligned with this strategy. However, that plan whilst relatively current, has not been very effectively invoked across Australia, due to a number of reasons and problems. These include a lack of regulated product stewardship schemes, poorly performing schemes, limited government commitments to circular economy outcomes and a general lack of regulatory intervention to drive change, eliminating free-riders and providing certainty to businesses to plan, invest and execute.

South Australia has a significant opportunity with this strategy to drive effective change and lead nationally. See below.

Vision and objectives (p18)

Of note is the idea of continuing leadership in waste management, resource recovery and transitioning to a circular economy. Leadership doesn't just happen, it requires leaders, foresight, capabilities, focus and resources.

The objectives are wide-ranging and the 'beyond 2030' aspirations don't yet identify responsibilities in sufficient detail. They do not identify product categories for attention (other than batteries), overlook issues with imported products, as well as product safety and the need to work with other relevant state agencies. It would also be safe to say that economic growth has not seen a reduction in material or energy footprint, they have unfortunately become larger over time.

Goals and Targets (p19-26)

There are seven targets, and nine focus areas as priorities for action.

Doubling SA's circularity by 2035 is an ambitious and worthy goal. It would have been useful to actually have a couple of annual measures for this prior to announcing a doubling of the 6% number over 10 years and break the over-arching number down for the sectors reported by the CSIRO in 2024 (which is based on 2019 data). The problem with nominating 6% is that this is derived from data before the current 2020-25 strategy. More data points would identify a trend linked to the interventions already undertaken in the 2020-25 strategy, linking actions and the metrics, providing a basis for projecting forward for 2025-30. Please note that the assumption of a 2023 baseline is incorrect as the data used by CSIRO was from 2019.

It would also be useful to also understand what measurement standard is being applied to measure the doubling. Is it the international OECD equivalent or a localised measure. Is it a new CERR survey or another set of metrics, or combined set.

Data collection is described throughout the draft as a limiting factor and Focus Area 8 delves into this but in a relatively high-level and not robust way. Is there a plan for greater regulation i.e. mandatory reporting from councils, EPA licensees, certain businesses or regulated product stewardship schemes?

Given the importance of data, it is worthy of an entire section in the strategy, devoted to what data, who from, its frequency, how it will be collected, to what standard etc. If not described in this new strategy (it isn't as yet), then Focus Area 8 needs to state it will be developed in detail over the next two to three years, in conjunction with relevant partners would perhaps provide greater confidence. See the Centre's Data and Reporting Guidelines for Product Stewardship for a complete list of performance metrics and their definitions essential to monitor the environmental, social and governance impacts and benefits of stewardship schemes and initiatives.

Target 1: 10% reduction in material footprint by 2035

The difficulty with this target is that it uses materials consumed elsewhere to manufacture goods South Australian's consume, while excluding materials made for exports, (based on 2024 modelling by CSIRO). This is not 10% reduction in say waste generated, they are not the same, however the measurement describes it as almost the same in the draft. This will require significant thought and skill as well as data to enable the measurement of this target. Again, multiple data points between 2025 - 35 will be useful to identify trends and responses to actions. As this target is based on the CSIRO data, it should be 2019 baseline, not 2023.

Target 2: 30% increase in material productivity by 2035

This is an ambitious goal, but the ability to measure this locally is challenging. The economic output of SA (GSP or GDP) isn't linked to material inputs, especially where products are sourced from other countries. Improving product design to use fewer resources is well and good, and can be a by-product of regulated producer responsibility schemes when included in scheme targets, however does the state have the data to measure this? One way which was used in the past was to map GSP against millions of tonnes wasted and landfilled. This is not the same measure as that described in the draft but gives an indication of efficiency and uses existing readily available data sets.

Therefore, it might be more useful to identify what data sets are needed and seek how to acquire these over the next five years?

Target 3 – 10% reduction in waste generated per person by 2030.

Target 3 won't in all likelihood be realised, as all indicators to date show that waste arising is increasing, recycling is increasing to maintain its current impact. There would need to be a stepwise change in behaviours to see this target achieved. The document identifies reduction, bans, design, repair, and adaptive re-use, education is missing. It is silent on how these initiatives will be implemented in SA (regulation, incentives, policy change etc) or what sectors need to be focussed on to give the biggest changes (built environment, packaging, households?).

Target 4- increase resource recovery and reduce contamination

This is where MSW, C&I and C&D targets are introduced for metropolitan and regional outback areas. These haven't changed from the previous two strategies, and there's unfortunately been little progress. In the case of regional areas, the document refers to waste strategies, perhaps a first test might be to identify initially which areas have strategies, test if they were implemented and to review them, with the aim of having a more current set of actions developed early in the life of this new 2025-30 strategy?

A renewed focus on regional waste and recycling/ circular economy infrastructure is warranted, especially for areas which have a growing population.

Perhaps for MSW, councils could be identified in a league table from best to worst, identifying why and what needs to be changed to improve performance, including education, infrastructure changes and enforcement actions?

South Australia's Container Deposit System isn't mentioned, and it should be noted this adds to the target and reduces contamination. Improving its performance would improve performance against the target.

Broadening the scope of containers included in the scheme, increasing the refund amount to 20c and incentives for more sustainable packaging would be of interest e.g. refillable containers, incentivising reverse vending and other technologies, retailer take back, better governance of the scheme and greater alignment/harmonisation with other state and territory schemes would be beneficial.

There has been substantial work done on this by the NSW, ACT, Queensland, WA and Victorian schemes on harmonisation to streamline operations and improve performance cost effectively. Likewise, the NSW EPA has been leading work on nationally harmonising/aligning state and territory regulations.

Target 5- 50% reduction in organics disposed to MSW kerbside and C&I landfill by 2030.
The baseline quantum is based on 2022 data. Would it be more useful to use 2023? Is 50% increase (i.e. 100,000 tonnes) achievable with the composting capacity we currently have? What are the regulatory changes that would assist this? E.g. weekly household FOGO, and requirements for restaurants and food outlets to have an organic waste stream service? What role does education and enforcement play in achieving targets?

Target 6: Maximise material circularity
Without a methodology outlined, this section is difficult to comment on, let alone measure. Meeting the target as described overlooks the opportunity of repair in prolonging the life of products, to slow the rate of material flow through economy, as well as incentivising product dematerialisation to narrow i.e. reduce the amount of material inputs in the first place e.g. unnecessary packaging. It also neglects to state how often say paper fibres can be recycled. Further, e-waste products have been overlooked in the list of products/materials in target 6 and 7. These are arguably more material intensive per unit than most of the other materials/streams listed.

Target 7: Increase circular consumption activities
Repair is the most obvious activity that should be focussed on and would go a long way to making inroads to increasing lifespans and reducing waste. It is suggested targets 6 &7 might be combined.

<u>Focus areas and priority actions</u>

Focus Area 1: Actions to Avoid Waste (p29)
1.1 and 1.2 are essentially elements to national Product Stewardship. In the absence of a national scheme for many products, it's important the Commonwealth Government is listed as a partner or alternatively work with Environment Ministers Group to drive nationally harmonised state-based product stewardship regulations.
1.2 add in Dept State Development and Dept Treasury and Finance as these agencies have influence over manufacturing, innovation, grants and incentives and importantly, procurement policies. Departments/agencies responsible for 'fair trading' and product safety should also be added.
1.6 add KESAB as a partner,
1.7- 1.10 are predominantly referring to repair and re-use. Planning should be included in the identification of locations suitable for repair hubs and ease of community access.
1.11-1.17 are predominantly about better measurement and reporting in the hope that this gives businesses the information to make better decisions and in so doing reduce their waste. The waste industry doesn't respond this way i.e. it wants to maximise the waste and the $ earned through disposal or recycling. Perhaps the best most effective way is to establish a better practice guide and requiring initially all government waste and cleaning contractors to abide by the guide in the first instance. This can be followed by mandating the guide for all contracting going forward, say post 2030? EPA needs to be added as a lead, if not a partner at 1.11. Item 1.16 should include the EPA as a lead, and possibly 1.17 (if there's weighing, maybe tracking would benefit EPA).

It would be useful to highlight in this section that the Built Environment features in its own section Focus Area 6. This area has been identified as one of the most important to focus on, and especially with regard to waste avoidance.

Focus Area 2 – Reduce Food Waste (p32)
Perhaps one of the most useful interventions would be to remove all 'best before' dates on packaging but isn't mentioned.

In relation to increasing recovery (2.5-2.70), it is suggested that these be mandated rather than simply be considered. End markets and quality products depend on the inputs to the system i.e. from households and from businesses. Cleaning up organics at source must remain a core activity and include local councils and not for profits in the effort to educate, and in some cases reprimand bad behaviours.

Focus Area 3 Reduce Material loss and preserve value (p37)
3.2 – it is suggested that this should be mandated in the Environment Protection Policy and not just considered. The same is true for 3.4, 3.5, and 3.6. In relation to 3.16 and 3.17, it might be worthwhile including the EPA, as these proposed activities may need to be licensed and regulated.
3.18 and 3.19 are the first mentions of product stewardship, and its in relation to tyres, and in particular outback areas. Some further direction might be provided in relation to Off The Road Tyres (OTR) and their current disposal practices, i.e. discarded in mines.
3.21 AS 4123.5-2008 might this not be an EPA regulatory requirement, rather than hoping the waste industry adopts same?
3.23 it would be useful to identify what these products or materials might be. Would all metals, tyres be considered for example?
3.28 should also include the EPA as a regulatory and advisory body on these matters.

Focus Area 4: Address emerging and problematic wastes (p43)
Actions to address problematic plastics and plastic packaging leaves out the activities of plastics sorting, plastics treatment and recycling. Some extra effort will be needed in MRFs now and even after some materials are banned, in order to clean up plastics waste streams in particular to make them suitable for recycling. Without a regulated national packaging stewardship scheme, or nationally aligned state regulated packaging stewardship schemes (including CDS), this already difficult issue will become very difficult.

In relation to renewable energy (p45) its noted that wind turbine blades in SA have no final home, it begs the question 'where have these been going'? It is noted that the SA Government has made a policy decision to developing a product stewardship scheme for photovoltaic systems less than 100GW. If this is the case, why wait for the Commonwealth to initiate a scheme (for which there's no public deadline or formal accountability), now is probably the time to enable this, perhaps the Commonwealth and other states can follow.

With respect to batteries (p47), South Australia should adopt the recent NSW legislation for product stewardship schemes and adopt the regulations for batteries, so SA and NSW are aligned. In relation to e-waste, again there may be something here that SA could do first, especially with regard to vapes, including disposal.

In relation to textiles (p49), it is noted that South Australia supports the voluntary scheme currently in place (Seamless). However, the scheme is still very limited, is voluntary and is therefore subject to exploitation by those who aren't members i.e. the freerider challenge. A national regulated scheme or nationally aligned state regulated schemes (by replicating the NSW Product Lifecycle Responsibility Act and supporting textile specific regulation) would see ALL brands involved and a unified effort to fix the end of life problems as well as the design issues (fast fashion).

CCA and other treated timber: the support for the notion of a product stewardship scheme is noted (p50). GISA would be aware of the work currently underway to address this.

Chemicals of concern and Hazardous waste (p52) - 4.23-4.26; These initiatives should all include the Commonwealth as a leader/ partner as this sphere of government has say over what chemicals are allowed and how they must be used, treated etc through mandatory guidelines etc. Safe collection and disposal of problematic chemicals is also a serious issue and would be worthy of more investment locally and nationally.

Focus Area 5 Develop and support circular markets and businesses (p53)
All of these initiatives are well founded and might be expected to deliver better outcomes during the period of the strategy. One area of focus might entail better transparency with respect to procurement decisions, i.e. environmental performance should be reported. South Australia should adopt the Commonwealth's environmentally sustainable procurement requirements and learnings from the Victorian Ecologic initiative.

Focus Area 6: Build a circular built environment (p57)
It is noted that GISA features as a lead in every initiative. Perhaps some of these should be left to others to have charge of and directly influence e.g. Department Housing and Urban Development. Waste avoidance is important here, as new dwellings give rise to huge amounts of waste and demand for everything electronic.

The role product stewardship is typically overlooked in relation to the built environment, however manufactured products used in construction and office fitouts represent a significant opportunity to encourage manufacturers and suppliers to take greater responsibility for products used in office fitouts including furniture, fixtures, fittings and floor covering eg. modular carpet tiles, broadloom carpet and resilient floor coverings. This is partly acknowledged in Greenstar ratings by the Green Building Council of Australia, however much more can be done to achieve increased levels of producer responsibility across the lifecycle of manufactured products used in the built environment.

Focus Area 7: Develop circular economy knowledge and skills (p61)
7.1- 7.3 partners might include not for profits such as KESAB?
7.8- Uni SA and Adelaide university have merged, so Uni SA can be removed?

Focus Area 8: Measure our transition to a circular economy
This is a critical area for attention in the coming 5 years. Robust data collection, analysis and policy development based on this data will be critical to identify the best interventions that will provide the biggest gains in terms of productivity, community acceptance, industry investment, identification of achievable targets and enable national and international comparisons. South Australia has led the way with regard to data collection since 2003 (now a national objective) and probably has the capability to do so again.

Mandatory reporting (transparency) of local government (8.4) is probably one of the key areas that will enable better comparisons and hence policy development. This reporting needs to be extended to EPA licensees, for the same reasons. It also enables the councils and businesses to have a better handle on their effectiveness, where attention is required for improvement, and lifting performance across the sectors included.

See the Centre's Data and Reporting Guidelines for Product Stewardship for a complete list of performance metrics and their definitions essential to monitor the environmental, social and governance impacts and benefits of stewardship schemes and initiatives.

Internationally developed and accepted measurement includes OECD CMUR, Ellen McArthur MCI, along with reparability indices, and recycled content labelling. Identification of problematic wastes also need to take the lead from international jurisdictions and adapted and adopted nationally and locally.

A clear focus on circular economy metrics would assist in the early phases of this strategy so performance can be accurately measured and modelled against targets. The need for appropriate reporting of data and its analysis is highlighted throughout the Draft Strategy. Given the importance of this aspect it would be useful to highlight actions and expectations on data and its reporting.

Cross-cutting enablers (p66) such as reviewing the GISA Act are useful provided these adopt and enable greater recognition of product stewardship and what this would bring to businesses, community and state efficiency and productivity. The cross- agency opportunity from adoption of circular economy policies is also happening nationally, due to the efforts of CEMAG, and should be emulated locally in SA. Procurement is omitted in this area (whilst mentioned earlier), it would be useful to reinforce as a cross cutting issue.

Other Areas

Energy from Waste: the EPA's position statement and the problems with energy from waste are noted and agreed. Where there may be a need for change is in respect to residual waste still being sent to landfill for metropolitan Adelaide. Energy is one level above landfill, maybe it's time to identify how this transition might occur. There are several issues to acknowledge and manage: cost of the technology i.e. investment required; access to the feedstock (residual waste only); suitable technology that will meet or exceed emissions requirements; energy take-off agreements. The opportunity this may present for dealing with dried biosolids might also be useful, rather than spreading contaminated material (incl. PFAS and other chemicals) onto farmland. The next 5 years should be dedicated to assessing and providing guidance for better solutions than landfill.

Final comments

There is a lack of emphasis on public engagement and education to promote behaviours which enable waste reduction, less contamination and purchasing decisions (labelling etc) is warranted, and works hand in glove with the measures highlighted in the Draft.

An opportunity to drive nationally aligned state regulated schemes (by replicating the NSW Product Lifecycle Responsibility Act and supporting product specific regulations e.g. batteries, textiles, bedding, tyres, soft plastics, photovoltaics, resilient flooring, soft plastics, sporting goods in collaboration with NSW) might also lead to

- greater uptake of product stewardship schemes,
- cause more investment in circular economy outcomes,
- build innovation in circular economy business opportunities,
- encourage better design of products and services,
- encourage the repair sector
- drive better metrics data collection, and analysis
- add to transparency of schemes and products
- educate the community
- reduce contamination
- improve recycling rates, and
- drive efficiencies and productivity improvements in the economy.

'Investing in Intelligent Regulation[1]' is the Centre's latest white paper which outlines why regulated product stewardship has strong economic advantages over voluntary approaches and the allocation of government grants. Specifically, the paper provides evidence why regulated product stewardship is especially effective in:

[1] https://stewardshipexcellence.com.au/resources/#toggle-id-1

- Stimulating investment: Regulation provides incentives for private sector investment, including in more challenging economic conditions.
- Ensuring that the investment is efficient: Well-designed regulation ensures that investment is aligned with the long-term interests of the community, promoting long-run economic efficiency.
- Driving productivity and competitiveness: Regulation provides incentives for innovation and technological growth, driving productivity and competitiveness.

While there is strong alignment between this draft strategy and those of other jurisdictions, this strategy is more complete and robust in its thinking. However, it is very important to ensure there's also strong continuity and complementarity between jurisdictions, with the over-arching aim of common policy focus, monitoring systems and regulatory instruments. Mandatory reporting from existing product stewardship schemes and from local government will aid in building the necessary metrics and inform policy interventions.

Please accept this email and the attached submissions and reports as information that can further inform the draft. These documents have been prepared and/or published by the Product Stewardship Centre of Excellence. Some, but not all are hyperlinked in the submission itself.

The following six documents are attached for your review and analysis as input to finalising South Australia's Waste Strategy 2025-2030. In several cases these documents contain recommendations, observations, conclusions and data that can contribute to building out the draft waste strategy.

1. Investing in Intelligent Regulation: The economic benefits to government of product stewardship regulation (2024). Published by the Product Stewardship Centre of Excellence

2. Annual Impact Report 2024 (includes the State of Play). Published by the Product Stewardship Centre of Excellence
3. Senate Inquiry into Waste Reduction and Recycling Policies. Product Stewardship Centre of Excellence submission, 2024

4. Productivity Commission Inquiry into Opportunities in the Circular Economy. Product Stewardship Centre of Excellence submission, 2024

5. Product Stewardship Centre of Excellence submission to CEMAG, 2023.

6. Evaluating Product Stewardship Benefits and Effectiveness – Summary Report (2023). Published by UTS Institute for Sustainable Futures and the Product Stewardship Centre of Excellence

NB Additional data reports resulting from extensive stakeholder consultation associated with this major project commissioned by DCCEEW are freely available via the Centre's website and the department has copies. Copies can be downloaded here: https://stewardshipexcellence.com.au/resources/#benefits

Thank you for the opportunity to comment on the Draft Strategy, and we look forward to seeing the final.

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