



Charitable Recycling Australia Submission

WA Directions Paper

Background

Charitable Recycling Australia commends the WA Government on its initiative to develop a Directions Paper and to consult key stakeholders in the sector.

The feedback provided in this submission takes the form of four sections:

- Independent data measuring the impact and importance of the charitable reuse sector to the Western Australian environment, society and economy.
- Strategic recommendations to strengthen the framework used in the Directions Paper, based on the Waste Hierarchy and a Circular Economy lens.
- The critical importance of integrating more higher order interventions like Reuse and Repair to accelerate Western Australia's transition to a Circular Economy.
- *Charitable Recycling Australia* would like to work with the WA Government to develop specific actions and improved measures for reuse to inform the next stage of Waste Strategy development – and recommends a Workshop on Reuse/Repair.

The Impact and Importance of the Charitable Reuse Sector in WA

The charitable reuse sector is by far the largest network in WA diverting household and clothing items away from landfill every year.

Charitable Recycling Australia commissioned independent research organisation MRA Consulting to conduct a *Charitable Impact Study*, which shows the impact in WA as:

- **Donations Processed** 81,950 Tonnes
- **Clothing Processed** 25,280 Tonnes
- **Recovery Rate** 86%
- **CO2 Emissions Saved** 72,341 Tonnes
- **Energy Saved** 153,715 MWh
- **Water Saved** 7,204 Megalitres
- **Income for Social Good** \$78,293,392
- **Income through Clothing** \$42,975,751
- **Reuse Clothing Exports** 8,320 Tonnes
- **Landfilled** 3,537 Tonnes



Strategic Recommendations to Strengthen the WA Framework

Based on the priority interventions recommended by the Waste Hierarchy, and using Circular Economy principles, *Charitable Recycling Australia* recommends the inclusion of the following in the WA Directions approach:

1.1 Waste Avoidance and Resource Recovery Strategy

- The *Avoid-Recover-Protect* triad misses the critical higher order intervention of 'Managing Resources' before they become waste, namely extending the life of existing resources through 'Reuse' and the low-hanging fruit of preparing items for reuse, otherwise known as 'Repair'.
- A four- tier approach of *Avoid-Manage-Recover-Protect* is recommended.
- Alternatively, the existing triad can be significantly strengthened by adding explicit interventions and targets for Reuse and Repair within the 'Protect' element.

1.1 Five Key Principles

Charitable Recycling Australia support the 5 key principles and believe they are adequate to inform waste management decisions, particularly shared responsibility and partnerships; better practice; and waste as a resource. We believe strong policy, extended producer responsibility and behaviour change underpin the effective delivery of the waste strategy.

1.2 Priority materials

- *Charitable Recycling Australia* was very pleased to see Textiles highlighted as a key material for focus and measurement in the Waste Strategy 2030. We would like to continue to see it identified as a key material to ensure it, along with the other key materials, get appropriate resourcing and policy support.
- Given the charitable reuse sector's critical role in textile diversion; processing 24,280 tonnes annually with an 86% resource recovery rate; WA has a massive opportunity to scale and accelerate the impact of the sector, by adding Reuse and Repair with explicit interventions.
- The launch of *Seamless*, the National Clothing Product Stewardship Scheme will also intensify the need for all State Governments – including WA – to focus on textiles.



1.3 Statewide Communications and Behaviour Change

- The State Government could assist with building markets for reused goods through a marketing campaign. The purchase of second hand good for reuse rather than generating more goods is key to avoiding waste and driving the circular economy.
- The Queensland Government recently funded a behaviour change and communications campaign to address illegal dumping and unusable donations at charity shops.
- There is an opportunity for WA to take a leadership position on this as well, as part of the strengthening of the key elements – including Reuse, the charitable reuse sector and clothing textiles in particular.

1.4 Our Environment – Community and Circular Economy

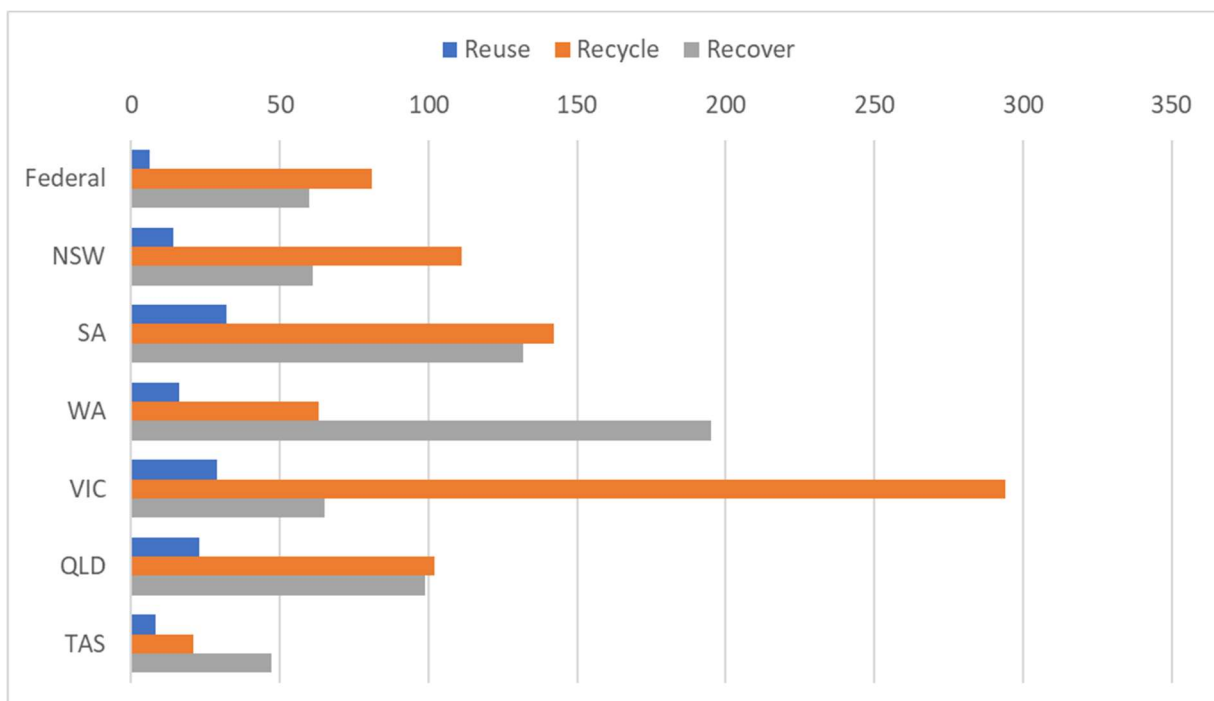
- *Charitable Recycling Australia* recommends the strengthening of the ‘Community’ and ‘Circular Economy’ themes, by engaging the charitable reuse sector and scaling its impact.
- The charitable reuse sector has been operating to Circular Economy principles for over 140 years since the first charity shop was launched in Australia to extend the life of household good through reuse, and as guardians of good stewardship.
- ‘Consumption, Use, Reuse and Repair’ is listed as a segment within the Directions Paper’s Circular Economy materials flow chart – but there are no specific interventions or targets commensurate with accelerating this critical component. *Charitable Recycling Australia* urges WA to include the charitable reuse sector with specific interventions to ensure the success of the transition to a Circular Economy. The State Government could assist with removing regulatory barriers to resale of goods including advocacy on right to repair and levelling the playing field of informal resale of goods compared to Charitable Recyclers resale.
- The same goes for supporting the ‘Community’ and ‘Collections’ themes within the Directions Paper – both of which are severely limited if there are no interventions or targets to support the charitable reuse sector, which has the biggest collections network in WA inclusive of donation bins/hubs and charity shops. Some potential interventions are outlined towards the end of our submission.



The Critical Importance of Integrating Higher Order Interventions like Reuse

Charitable Recycling Australia's key policy objective is to get Reuse integrated into Australian government policies, to embody the Waste Hierarchy into full practice, and to fast-track the transition to a Circular Economy.

Reuse, which results in avoidance of waste, sits at the top of the Waste Hierarchy as a highest and best use intervention and yet it is largely unsupported by Australian government waste policies, resourcing and action. An independent gap analysis of Australian government policies through the lens of the Waste Hierarchy and Circular Economy principles demonstrates the current limited focus on the bottom of the hierarchy like Recycle and Recover.



More importantly, it also identifies opportunities for Reuse to accelerate existing government targets and their ambitions for circular economy transitions.

Paying lip service to the Waste Hierarchy undermines its efficacy. We all know the Waste Hierarchy establishes agreed priorities based on sustainability to reduce and manage waste, and that waste cannot be solved with end-of-life technologies alone. But the hierarchy is useless if it's not used. Australia needs to stop resisting an integrated approach and start embedding highest and best use interventions like reuse and repair into policy.



It could be argued that reuse was too difficult to measure to be translated into policy targets for the past 140 years where the charitable sector has been operating to circular economy principles since the first charity shop was launched in Australia in the 1880s - sparking reuse to extend the life of everyday household products in what then may have been the first product stewardship scheme.

Today, following ground-breaking research from Monash University, we can effectively measure reuse and articulate its triple bottom line benefits, through the *National Reuse Measurement Guidelines*, which provide a comprehensive methodology to measure reuse (through POS) and quantify its environmental, economic and social benefits.

In the Monash University approach, reuse will be measured at the point of sale, which captures information about the quantity of items resold, the category of items, and their cost – and allows for the interpretation of data into average weights per category, average material composition and product life cycle assessments that are readily available.

Using this data and other reporting as outlined in the framework, it is now possible to demonstrate the social, environmental and economic impacts of reuse, including:

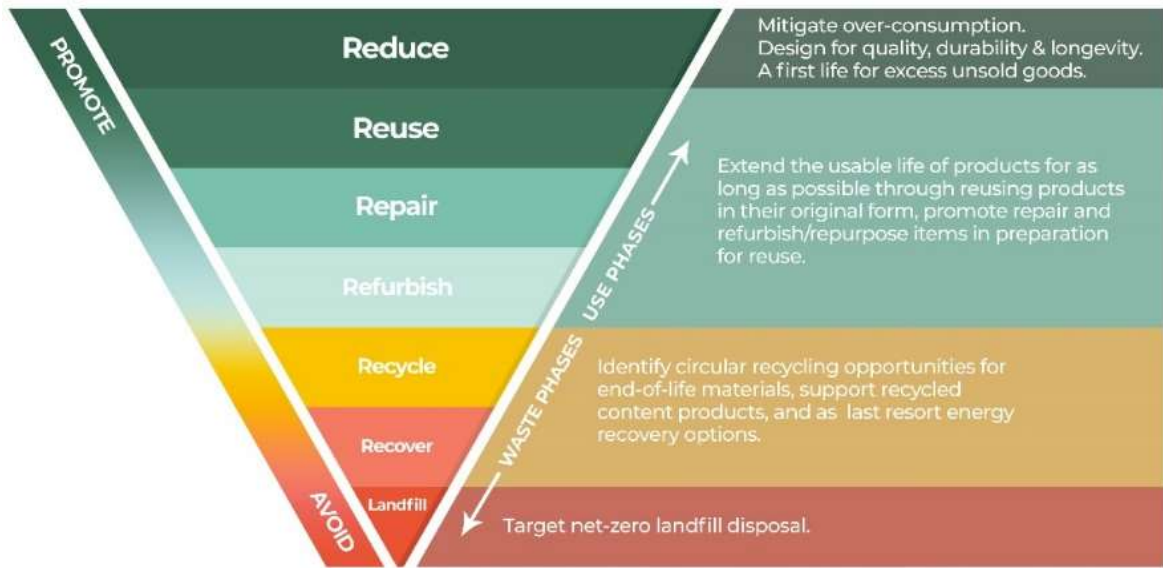
- Avoided virgin material consumption and greenhouse gas emissions savings
- Employment and volunteer opportunities – in a high job creation sector including scaling jobs for people facing barriers
- Skills development and work-readiness support – to capture the additional supports the charitable sector provides over and above typical training, to integrate people facing barriers
- Education and community engagement – to capture reuse workshops, events and training
- Total value of reused goods sold in the charitable and community reuse sector each year
- Total value of goods provided for welfare and in-kind to other organisations

This is relevant for all Australian governments as it allows reuse to be integrated into their Circular Economy policies as a highest and best use intervention on the Waste Hierarchy.

Charitable Recycling Australia also developed a bespoke upgrade of the Waste Hierarchy, re-naming it the Resource & Waste Hierarchy to prioritise the resource use phases of highest and best use, over the waste phases.



Resource & Waste Hierarchy



Charitable Recycling Australia authorised version of the Waste Hierarchy

With these new resources, the charitable reuse sector in Australia is now in a position to start walking the talk on the Waste Hierarchy and step up as a global leader in the Circular Economy.

Charitable Recycling Australia's strategy to influence policy change, is to articulate an irrefutable, data and evidence business case on why reuse is critical to governments and the circular economy.

To do that with integrity, we also need to articulate a case for Highest & Best Use in principle so that all of the higher order interventions are prioritised in order.

In line with this, *Charitable Recycling Australia* is also partnering with a cross-sector group of highest and best use organisations to advocate collectively for all higher order interventions including First Use, Reuse and Repair.

- First Use – Mitigate over consumption. Design for quality, durability and longevity. A first life for excess unsold goods.
- Reuse – Extend the usable life of products for as long as possible, through reuse in their original form.
- Repair – Promote repair, refurbish and repurpose items in preparation for reuse.

The partnership advocates collectively on a policy codesign approach on shared interventions to accelerate higher order interventions, and frame conversations as mutual opportunities with Australian governments in a shared approach to accelerating circularity together.



Specifically for WA, *Charitable Recycling Australia* recommends a joint **Reuse & Repair Workshop** with DWER to discuss and identify WA's key needs and Circular Economy ambitions, and to develop a shared vision of how to collectively create a Circular Economy by 2030.

This also necessitates a solution-based approach with cross-sector recommendations on what the required interventions may be, as well as their impact – and then move to economic modelling and/or a cost-benefit analysis to inform the next steps.

What has proved helpful in the meetings to date with other State Governments are:

- Option to pilot fund the National Reuse Measurement Guidelines either fully or on priority streams; textiles and e-waste have been suggested by one government as a key focus. This data will inform government targets and enable evidence-based policy development.
- Option to workshop insights and recommendations from cross-sector higher order operators, and then stress-test these ideas with a government funded cost-benefit analysis.
- Option to develop specific proposals on how reuse can be accelerated to reduce items going to landfill in the short-terms, and to identify strategic Circular Economy.
- Option to link higher order interventions directly to Australian government targets in order to fast-track progress towards achieving them, and towards Circular Economy by 2030.
- Option to discuss the 10 specific policy considerations recommended by the Codesign Partnership to strengthen Circular Economy Impact by 2030.

Helpful Links:

- **Government Gap Analysis:** <https://www.charitablerecycling.org.au/about/policies-and-projects/gap-analysis-of-government-policies/>
- **Reuse Immersive:** <https://www.charitablerecycling.org.au/about/policies-and-projects/reuse-immersive/>
- **National Reuse Measurement Guidelines:** <https://www.charitablerecycling.org.au/about/policies-and-projects/national-reuse-measurement-guidelines/>
- **Resource & Waste Hierarchy:** <https://www.charitablerecycling.org.au/about/policies-and-projects/resource-and-waste-hierarchy/>
- **Highest & Best Use Codesign Partnership:** <https://www.charitablerecycling.org.au/about/policies-and-projects/highest-best-use-codesign-partnership/>



Call to Action and Next Steps

Charitable Recycling Australia's recommends a co-design approach with DWER, with the proposed next step as a co-hosted Reuse & Repair Workshop to identify the higher order interventions needed to strengthen WA's Directions Paper and accelerate its transition to a Circular Economy.

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