

Shoalhaven City Council's Advocacy for Waste Levy Reclassification: A Comprehensive Review (2000-Present)

I. Executive Summary

Shoalhaven City Council has consistently pursued reclassification from the Metropolitan Waste Levy Area (MLA) to the Regional Waste Levy Area (RLA) since at least 2003. This persistent advocacy stems from the Council's contention that its current classification is arbitrary and imposes a disproportionate financial burden on its community. A pivotal moment occurred in 2018 when a NSW Parliamentary Inquiry explicitly recommended Shoalhaven's reclassification, a recommendation officially "Supported" by the NSW Government. Despite this formal endorsement, Shoalhaven remains subject to the significantly higher MLA levy rates, which directly impact residents and businesses through increased waste disposal costs and constrain the Council's capacity for strategic investment in local waste management infrastructure. This report details the Council's long-standing efforts, the state government's responses, the tangible impacts of the current classification, and outlines potential avenues for future advocacy within the evolving landscape of NSW waste policy.

II. Introduction

The management of waste is a critical function for local governments, encompassing environmental protection, public health, and economic sustainability. In New South Wales (NSW), the waste levy serves as a key economic instrument designed to promote resource recovery and reduce reliance on landfill disposal. This levy, administered by the NSW Environment Protection Authority (EPA), operates on a tiered system, with different rates applied based on geographical classifications: the Metropolitan Levy Area (MLA) and the Regional Levy Area (RLA). The distinction between these areas carries significant financial implications for local councils and their communities, directly influencing the cost of waste services.

This report aims to comprehensively document and analyze the sustained advocacy by Shoalhaven City Council to be reclassified from the Metropolitan Waste Levy Area to the Regional Waste Levy Area. Covering the period from 2000 to the present day, the analysis draws upon council minutes, parliamentary reports, government policy documents, and

relevant public statements. The objective is to provide a detailed account of the Council's communications and actions, the responses from the NSW EPA and the NSW Government, and to illuminate the historical context and ongoing impacts of Shoalhaven's current waste levy classification. By examining these dynamics, the report seeks to offer a clear understanding of the challenges faced by Shoalhaven and the broader policy considerations for waste management in regional NSW.

III. NSW Waste Levy Framework and Shoalhaven's Classification

The NSW Waste Levy is a cornerstone of the state's waste management policy, designed to encourage resource recovery and minimize waste sent to landfills. Its structure and application are central to understanding Shoalhaven City Council's ongoing efforts for reclassification.

Explanation of Metropolitan Levy Area (MLA) and Regional Levy Area (RLA) Criteria and Rates

The NSW waste levy operates under a tiered system, with varying rates applied depending on whether a waste facility is located within or receives waste from the Metropolitan Levy Area (MLA) or the Regional Levy Area (RLA).¹ This differential pricing is intended to incentivize resource recovery by making landfilling more expensive, thereby enhancing the economic competitiveness of recycling and other diversion strategies.¹

The MLA generally encompasses the greater Sydney, Illawarra, and Hunter regions, along with coastal local government areas extending up to the Queensland border. The RLA includes other designated regional areas across NSW.² The specific criteria for defining these boundaries are outlined within the Protection of the Environment Operations Act 1997 (POEO Act) and its associated regulations.²

For the 2024-2025 financial year, the solid waste levy rates are set at \$170.10 per tonne for the Metropolitan Levy Area and \$97.90 per tonne for the Regional Levy Area.⁶ These rates are adjusted annually, typically in line with the Consumer Price Index (CPI).¹ Projections indicate that metropolitan rates will continue to increase by \$10 per tonne annually until reaching \$145 per tonne by July 1, 2027, with regional rates escalating proportionally.³ This annual escalation means the financial disparity between the two classifications continues to widen over time.

Confirmation of Shoalhaven City Council's Current Classification as a Metropolitan Levy Area

Despite its geographical characteristics and status as a regional center, Shoalhaven City Council is currently classified within the Metropolitan Levy Area.⁷ This classification is explicitly reflected in the waste disposal charges at Shoalhaven's facilities, which include the state government waste levy at the MLA rate of \$174.20 per tonne, plus GST.⁹ This directly impacts the costs borne by residents and businesses within the Shoalhaven local government area.

Historical Context of Shoalhaven's Inclusion in the MLA

A significant point of contention for Shoalhaven City Council, and a key element of its advocacy, is the historical basis of its MLA classification. A 2018 Parliamentary Inquiry into Energy from Waste Technology critically examined this issue. The inquiry's final report highlighted that Shoalhaven "appears to have been arbitrarily assigned to the Metropolitan Levy Area".⁸ The committee found "no justification for this" classification, particularly when considering that other councils geographically closer to Sydney are situated in the Regional Levy Area, and Shoalhaven's immediate neighbor, Eurobodalla, falls into the unregulated area.⁸ This finding underscores a perceived inconsistency in the application of the waste levy boundaries, which has become a foundational argument for Shoalhaven's ongoing efforts. The explicit finding by the 2018 Parliamentary Inquiry that Shoalhaven's assignment to the MLA was "arbitrary" provides a powerful and enduring justification for the Council's advocacy. This is more than a mere factual statement; it implies a lack of consistent and defensible criteria in the initial classification process, which inherently undermines the fairness of the levy system for Shoalhaven. This perceived injustice positions the Council's efforts not merely as a request for financial relief but as a legitimate pursuit of equity and the correction of a systemic flaw. Such a designation can strengthen the Council's stance in negotiations and public discourse, framing its campaign as a demand for a more just application of environmental policy.

The substantial difference in levy rates between the MLA (e.g., \$174.20/tonne for 2025-2026) and the RLA (e.g., \$100.30/tonne for 2025-2026) represents a significant financial burden of over \$70 per tonne on Shoalhaven.³ This direct cost differential is passed on to residents and businesses through higher disposal fees.⁹ The annual escalation of these rates means this disparity will continue to grow, compounding the financial pressure over time. This quantifiable economic disadvantage provides a clear and compelling incentive for reclassification, highlighting that the financial argument is not abstract but directly impacts the cost of living and local economic activity, making it a high-priority issue for the Council. To illustrate the direct financial disparity faced by Shoalhaven, the following table compares the historical and projected NSW Waste Levy rates for Metropolitan and Regional Levy Areas:

Table 1: Comparison of NSW Waste Levy Rates (Metropolitan vs. Regional)

Financial Year	Metropolitan Levy Area	Regional Levy Area	Difference (per tonne)
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	(MLA) Rate (per tonne)	(RLA) Rate (per tonne)	
2023-24	\$163.20 ¹	\$94.00 ¹	\$69.20
2024-25	\$170.10 ⁶	\$97.90 ⁶	\$72.20
2025-26	\$174.20 ³	\$100.30 ³	\$73.90
2027 (projected)	\$145.00 (target) ³	Indexed ³	Varies

This table visually demonstrates the direct financial disparity that Shoalhaven faces. By presenting the actual levy rates side-by-side over recent years, it immediately quantifies the economic burden on the community. This clarity allows policymakers and stakeholders to grasp the scale of the financial impact on Shoalhaven in comparison to a regional classification, reinforcing the arguments for equitable treatment and reclassification. It serves as a foundational data point for understanding the core of the Council's grievance.

IV. Shoalhaven City Council's Advocacy for Reclassification (2000-Present)

Shoalhaven City Council has engaged in a sustained and multi-faceted advocacy campaign to achieve reclassification of its waste levy status. This section meticulously documents the various forms of communication and strategic efforts undertaken by the Council.

A. Key Council Resolutions and Mayoral Minutes

The Council's commitment to reclassification is formally enshrined in its official proceedings. A notable example is the Mayoral Minute MM23.19, adopted on June 26, 2023.⁷ This resolution explicitly directed that "Council writes to the Member for South Coast Ms Liza Butler MP seeking a change to Shoalhaven City Council's Waste Levy classification from Metropolitan to Regional".⁷ The minute is particularly significant as it directly references the findings of the 2018 Parliamentary Inquiry into Energy from Waste Technology, which recommended Shoalhaven's reclassification, noting the committee's determination that the Council "appears to have been arbitrarily assigned to the Metropolitan Levy Area" with "no justification".⁸ The minute further confirms that the Council has made "multiple representations regarding the matter dating from 2003 through to 2023"⁸, underscoring the long-standing and consistent nature of this advocacy.

The evolution of Shoalhaven's advocacy, from general representations dating back to 2003 to the specific Mayoral Minute in 2023 targeting the local Member of Parliament and explicitly citing a Parliamentary Inquiry's recommendation, demonstrates a refinement of strategy.⁷ This shift indicates a move beyond broad complaints towards leveraging formal parliamentary findings and targeting key political figures. The adoption of a specific parliamentary recommendation as a central argument reflects a more sophisticated and evidence-based

approach to advocacy. This progression suggests that Shoalhaven has adapted its methods over time, employing a more focused and potentially impactful strategy by grounding its requests in official government findings.

B. Submissions to Parliamentary Inquiries and Government Reviews

Shoalhaven City Council has actively participated in broader governmental reviews and inquiries related to waste management. In 2017, the Council submitted a document to the Parliamentary Inquiry on Energy from Waste Technology. In this submission, Shoalhaven highlighted "the challenges faced by regional areas, including the economic impact of distance to recycling processors and the disproportionate effect of waste levies".¹⁰ While the inquiry's primary focus was on energy-from-waste technologies, the Council strategically utilized this platform to articulate the broader impacts of waste levies on regional communities, thereby laying the groundwork for its reclassification arguments. More recently, the NSW Government, through the EPA, initiated a public consultation on the "Review of the NSW waste levy: Issues paper" in 2024, with feedback sought until July 15, 2024.¹ This review's stated objectives include adjusting levy rates and boundaries to enhance resource recovery while mitigating cost-of-living impacts and fostering a "fair playing field" for waste operators.¹ Although specific details of Shoalhaven's submission to this 2024 review are not explicitly provided in the available information, it is highly probable that the Council, given its consistent advocacy and the active participation of Local Government NSW (LGNSW) in similar consultations¹, would have provided feedback reiterating its position for reclassification.

C. Correspondence and Representations to State Members of Parliament

The June 2023 Mayoral Minute specifically directed that correspondence be sent to Ms. Liza Butler MP, the Member for South Coast.⁷ Ms. Butler's background as a former Shoalhaven City Councillor¹³ suggests a pre-existing understanding of local government operations and community concerns within the Shoalhaven region. This prior experience could position her as a sympathetic and effective advocate for the Council's interests within the state parliament. While direct responses from Ms. Butler on this specific reclassification request are not detailed in the provided materials, the Council's decision to specifically target her indicates a strategic effort to leverage local parliamentary representation for its cause.

D. Collaboration with Local Government NSW (LGNSW)

Shoalhaven City Council's advocacy for reclassification is significantly bolstered by its

alignment with the broader stance of Local Government NSW (LGNSW), the peak representative body for councils in the state. LGNSW has consistently opposed the extension of the waste levy to areas outside the current regulated zones and has strongly advocated for reforms that benefit regional councils.¹⁵ Their arguments, which closely mirror Shoalhaven's position, include:

- **Lack of Clear Rationale:** LGNSW contends that the waste levy, originally designed to address landfill space shortages in metropolitan areas, lacks a sound basis for its application or extension in regional and rural contexts. They argue that the distinct circumstances of these areas, which may not face the same imperatives or have similar recycling opportunities, are often overlooked.¹⁵
- **Risk of Illegal Dumping:** LGNSW has observed a noticeable increase in illegal dumping, including hazardous materials like asbestos, in regulated areas since the levy's introduction. They argue that the levy can act as a deterrent for lawful disposal, thereby shifting cleanup costs to councils and potentially leading to worse environmental outcomes. Conversely, the absence of a levy in some regional areas might result in better environmental outcomes by encouraging waste disposal at legitimate landfills rather than through illegal means.¹⁵
- **Uncertainty of Levy Increases:** A well-founded skepticism exists among councils that once a levy is introduced or applied, its rates will remain low or not escalate significantly beyond initial forecasts. LGNSW cites historical precedents where levies have far exceeded original projections, leading to substantial and unforeseen financial burdens on communities.¹⁵
- **Insufficient Hypothecation:** A long-standing position of LGNSW is that the waste levy should be "fully hypothecated," meaning that all funds collected from the levy should be returned, preferably to the regions where they were generated, for reinvestment in waste management services, including reduction, avoidance, and reuse programs. The current system, where only a fraction of the collected levy is reinvested in waste initiatives, is seen as inadequate.¹⁵
- **Increased Compliance Costs:** LGNSW highlights the additional administrative and compliance burdens that councils face under waste levy regulations, such as the requirement for weighbridges, detailed reporting, and tracking of waste streams. They argue that these operational and administrative costs often outweigh any benefits, particularly for smaller regional councils with limited resources.¹⁵

The comprehensive arguments put forth by LGNSW against the waste levy's impact on regional areas directly mirror and amplify Shoalhaven's specific concerns.¹⁰ This strong alignment indicates that Shoalhaven's reclassification issue is not an isolated case but rather part of a broader, systemic challenge faced by numerous regional councils across NSW. The collective voice of LGNSW provides a powerful, unified front, lending greater weight to individual council pleas. This suggests that Shoalhaven's success or failure in achieving reclassification could establish a precedent or influence the broader waste levy policy for other regional councils. Therefore, continued collaboration with LGNSW represents a vital component of Shoalhaven's long-term advocacy strategy, as collective action can exert

greater pressure on the state government for systemic reform.

The following table provides a chronological overview of Shoalhaven City Council's key communications and advocacy efforts regarding waste levy reclassification:

Table 2: Chronology of Shoalhaven City Council's Key Communications and Advocacy Efforts (2000-Present)

Date of Communication/Action	Type of Communication/Action	Recipient/Target	Key Content/Purpose	Relevant Source ID(s)
2003-2023 (multiple instances)	Representations/Correspondence	NSW Government/EPA	Seeking change to waste levy classification	⁸
2017	Submission to Parliamentary Inquiry	NSW Parliament (Energy from Waste Inquiry)	Highlighted disproportionate impact of waste levies on regional areas, economic impact of distance to recycling processors	¹⁰
June 26, 2023	Mayoral Minute (MM23.19) and Council Resolution (MIN23.312)	Member for South Coast (Ms. Liza Butler MP)	Formal request for reclassification from Metropolitan to Regional, citing 2018 Parliamentary Inquiry findings of "arbitrary assignment"	⁷
2024 (ongoing)	Feedback/Submission to NSW Waste Levy Review	NSW EPA	Likely reiteration of reclassification request within review's objectives of "fair playing field" and "cost-of-living" impacts	¹

This table provides a clear, chronological narrative of Shoalhaven's sustained advocacy efforts. It allows for quick identification of key milestones, the consistency of their message, and the various channels through which they have communicated. This structured overview demonstrates the Council's long-term commitment to the issue, reinforcing the legitimacy and urgency of their request for reclassification. It also helps to track the historical progression of

their arguments and the entities they have engaged.

V. NSW Government and EPA Responses to Reclassification Efforts

The responses from the NSW Government and the Environment Protection Authority (EPA) to Shoalhaven's reclassification efforts have been varied, ranging from formal acknowledgment to ongoing review processes.

A. Outcomes of Parliamentary Inquiries

A critical development in Shoalhaven's advocacy occurred with the 2018 Parliamentary Inquiry into Energy from Waste Technology. The inquiry's final report, released on March 28, 2018, included a direct and significant recommendation (Recommendation 3) that "the NSW Government reclassify Shoalhaven City Council from the Metropolitan Levy Area to either the Regional Levy Area or the unregulated area".⁸ The committee's rationale was explicit, stating that it found "no justification" for Shoalhaven's existing MLA classification, noting its heavy impact and arbitrary assignment compared to other local government areas.⁸

Crucially, the NSW Government's official response to this recommendation, tabled on September 18, 2018, was explicitly "Supported".¹⁶ This formal endorsement by the government signals an acknowledgment of the validity of the reclassification argument and the merits of the inquiry's finding. However, despite this clear support, Shoalhaven City Council remains classified within the Metropolitan Levy Area as of recent records, with its waste disposal charges continuing to include the higher MLA rate of \$174.20 per tonne.⁷ This disparity between official policy acknowledgment and practical implementation represents a significant gap that forms a central point of contention for Shoalhaven.

The fact that the NSW Government formally "Supported" the 2018 parliamentary recommendation for Shoalhaven's reclassification, yet the Council remains in the MLA, presents a powerful point of leverage. This situation shifts the burden of justification from the Council (to prove why it should be reclassified) to the NSW Government (to explain why a formally endorsed recommendation has not been implemented). This indicates potential bureaucratic inertia, competing governmental priorities, or a lack of political will to act on a previously agreed-upon policy direction. Future advocacy by Shoalhaven can heavily emphasize this discrepancy, demanding accountability and a clear timeline for the implementation of the 2018 recommendation. This approach transforms the advocacy from a mere request into a call for consistency and follow-through on government commitments.

B. NSW EPA Waste Levy Reviews and Consultation

The NSW Government, through the EPA, has demonstrated an ongoing commitment to reviewing and potentially adjusting the waste levy framework. A significant initiative is the current "Review of the NSW waste levy: Issues paper," for which public feedback was sought until July 15, 2024.¹ The stated objectives of this comprehensive review include adjusting levy rates and boundaries to "increase resource recovery in NSW, while minimising impacts on cost-of-living" and to "create a fair playing field for waste operators who safely and sustainably manage waste".¹ While the review is ongoing and specific outcomes are not yet available, it represents a current opportunity for Shoalhaven's reclassification case to be considered within a broader policy reform context.

The EPA consistently frames the waste levy as a vital instrument for promoting resource recovery and diverting waste from landfill.¹ The agency's current review indicates an openness to re-evaluating the levy's operation, including its rates and geographical boundaries, to ensure its continued effectiveness and address stakeholder concerns.¹ However, the available information does not provide detailed public criteria or a transparent methodology for how metropolitan versus regional boundaries are precisely defined or how individual reclassification requests are assessed, beyond general statements about regulated areas.¹ The NSW Government's stated objective for the 2024 waste levy review to "create a fair playing field for waste operators" directly aligns with Shoalhaven's argument of arbitrary and inequitable classification.¹ By framing its reclassification request within this broader government objective, Shoalhaven can strategically position its case as a concrete example of how the government can achieve its stated goals. This suggests a potential policy window where Shoalhaven's specific issue can be addressed as part of a larger, systemic reform agenda. This approach enhances the political salience and urgency of Shoalhaven's request, demonstrating how a reclassification would contribute to a more equitable and effective waste levy system across NSW.

VI. Impact of Current Classification on Shoalhaven

Shoalhaven City Council's current classification within the Metropolitan Waste Levy Area carries tangible and significant consequences, affecting both the financial well-being of its community and its capacity for effective waste management and resource recovery.

A. Financial Implications

The most immediate and direct impact of Shoalhaven's MLA classification is the substantial financial burden placed on its residents and businesses. Shoalhaven City Council's waste disposal charges explicitly incorporate the state government waste levy of \$174.20 per tonne, plus GST.⁹ This direct pass-through of the higher Metropolitan Levy Area rate means that households and commercial entities in Shoalhaven bear significantly greater costs for waste

disposal compared to those in Regional Levy Areas, where the rate is \$100.30 per tonne.³ This disparity directly contributes to higher household expenses and increased operational costs for local businesses, impacting the overall cost of living within the region.

The substantial waste levy payments also represent a considerable outflow of funds from the local waste management system to the state government. A 2019 report highlighted the immense financial pressure the levy exerts on the Council's budget, projecting that a new waste processing facility at West Nowra could "reduce the council's waste levy bill to the NSW Government by nearly \$7 million (\$4 million for domestic waste) per year".¹⁷ This figure underscores the magnitude of funds that are diverted from local reinvestment in waste infrastructure and services due to the higher levy.

The direct inclusion of the MLA levy rate in Shoalhaven's disposal charges means that the higher levy directly translates into increased costs for every household and business disposing of waste.⁹ This situation directly contrasts with the NSW Government's stated aim in its 2024 waste levy review to "minimise impacts on cost-of-living".¹ For a regional community like Shoalhaven, where economic pressures might already be prevalent, this additional, arguably arbitrary, cost exacerbates financial strain. This frames the reclassification issue not just as a technical or administrative matter but as a critical social and economic concern for the Shoalhaven community. By linking the levy to cost-of-living impacts, Shoalhaven can garner greater public and political support for its reclassification efforts, particularly within the context of current government priorities.

B. Challenges for Waste Management and Resource Recovery

While the waste levy is fundamentally intended to incentivize resource recovery and divert waste from landfill¹, the high cost associated with Shoalhaven's MLA classification can paradoxically hinder local investment in advanced waste processing technologies. The recent challenges faced by the Bioelektra Australia project, which aimed for a 90% reduction in landfill waste and significant levy savings, exemplify the financial risks and high capital requirements for such innovative initiatives.¹⁷ The project's collapse and the subsequent need for the Council to provide an additional \$10 million to complete its Materials Recovery Facility (MRF) at West Nowra¹⁹ underscore the financial intensity of developing robust local resource recovery infrastructure. The ongoing burden of high levy payments may divert funds that could otherwise be allocated to these crucial local developments, potentially impeding Shoalhaven's ability to achieve its waste diversion goals.

The waste levy's stated purpose is to incentivize resource recovery.¹ However, for Shoalhaven, being categorized within the MLA means incurring a significantly higher levy. This substantial financial obligation, as evidenced by the projected \$7 million annual levy reduction from the Bioelektra project, represents a considerable financial outflow.¹⁷ These funds, if not paid as a levy, could be reinvested locally in waste management infrastructure and innovation. The requirement for a \$10 million shortfall to complete the new Materials Recovery Facility further illustrates the capital intensity of waste infrastructure projects.¹⁹ Thus, the high levy, while

designed to encourage waste diversion from landfill, may simultaneously deplete the financial capacity of regional councils like Shoalhaven to invest in the very facilities that enable higher resource recovery rates. This situation highlights a systemic challenge or unintended consequence of the current levy boundary definitions. For certain regional local government areas incorrectly categorized as metropolitan, the levy appears to function more as a revenue stream for the state than as an effective incentive for local waste innovation and infrastructure development, thereby hindering, rather than facilitating, the achievement of broader resource recovery goals.

Furthermore, as articulated in Shoalhaven's 2017 submission to the Parliamentary Inquiry, regional areas face unique logistical and economic challenges, including the "economic impact of distance to recycling processors".¹⁰ Being classified as metropolitan, while simultaneously contending with inherent regional logistical disadvantages, creates a disproportionate burden. This can negatively affect the economic viability of local recycling markets and the overall competitiveness of waste management services within the region, making it more difficult to establish and sustain a circular economy locally.

VII. Conclusion and Future Outlook

Shoalhaven City Council's persistent efforts to be reclassified from the Metropolitan Waste Levy Area to the Regional Waste Levy Area underscore a significant and long-standing issue of equity and financial burden. The Council's advocacy, spanning from at least 2003 to the present, is firmly rooted in the argument that its current classification is arbitrary and lacks justifiable rationale, particularly when compared to other regional councils or those geographically closer to Sydney that benefit from lower levy rates.

A critical juncture in this advocacy was the 2018 Parliamentary Inquiry into Energy from Waste Technology, which explicitly recommended Shoalhaven's reclassification. Crucially, the NSW Government formally "Supported" this recommendation. However, this support has not yet translated into practical implementation, leaving Shoalhaven subject to significantly higher levy rates (currently \$174.20 per tonne for MLA compared to \$100.30 per tonne for RLA). This discrepancy imposes a considerable financial burden on the Council's residents and businesses through elevated waste disposal costs, and it constrains the Council's capacity for essential local investment in waste management infrastructure, as evidenced by the potential for millions in annual levy savings. Shoalhaven's position is further strengthened by its alignment with the broader concerns articulated by Local Government NSW regarding the inequitable application and insufficient hypothecation of the waste levy in regional contexts. The fact that the NSW Government "Supported" the reclassification recommendation in 2018 but has not yet implemented it is a powerful narrative element. It transforms Shoalhaven's request from a mere appeal into a demand for accountability and follow-through on a previously agreed-upon policy direction. This provides a strong moral and political foundation for the Council's continued advocacy. Future communications should explicitly challenge the government on this point, seeking clarification on the reasons for non-implementation and

demanding a clear pathway and timeline for action. This can put pressure on the government to reconcile its stated support with its actual policy application.

Potential Future Directions for Shoalhaven's Advocacy

To advance its reclassification agenda, Shoalhaven City Council could consider the following strategic directions:

- **Strategic Engagement with Ongoing Reviews:** The Council should continue to actively engage with current and future NSW Waste Levy reviews, such as the 2024 review. It is vital to frame its reclassification request within the government's stated objectives of creating a "fair playing field" and minimizing "cost-of-living impacts." By demonstrating how a reclassification aligns with these broader policy goals, Shoalhaven can increase the relevance and urgency of its case.
- **Pressing for Implementation of Endorsed Recommendations:** A key focus must be to hold the NSW Government accountable for its previously "Supported" parliamentary recommendation for reclassification. This requires persistent and direct communication with relevant ministers and departments, highlighting the inconsistency between policy statements and practical outcomes.
- **Continued Collaboration and Data Sharing:** Strengthening collaboration with Local Government NSW and other similarly affected regional councils can amplify the collective voice for systemic reform. Sharing robust data on the financial impacts of the current classification and the effectiveness of local waste management investments under the current levy structure can provide compelling evidence for their collective case.
- **Showcasing Local Innovation:** Continuing to highlight investments in local waste infrastructure, such as the new Materials Recovery Facility, can demonstrate Shoalhaven's unwavering commitment to resource recovery. This can serve as a compelling argument that a more equitable levy classification would further enable these local efforts, contributing to broader state-level environmental objectives.

Broader Waste Levy Policy Outlook

The ongoing nature of waste levy reviews by the NSW Government indicates a dynamic policy environment and a recognition of the need for continuous improvement in waste management frameworks. The increasing emphasis on circular economy principles and addressing economic impacts suggests a potential for future policy adjustments that could be more favorable to regional areas.

Beyond just waste management, the waste levy impacts the financial health of the Council and the cost of living for its residents. Reclassification, therefore, is not solely about waste; it is fundamentally about regional equity and supporting the economic viability of a growing regional center. The government's focus on "cost-of-living impacts" in its ongoing review

provides an opportunity to frame reclassification as a measure that supports broader regional development and reduces financial strain on a significant regional community. This broadens the scope of Shoalhaven's advocacy, elevating it from a specific waste issue to a matter of regional economic and social equity. By demonstrating how a more favorable waste levy classification contributes to the overall well-being and development of the Shoalhaven region, the Council can appeal to a wider range of government portfolios and stakeholders, increasing the likelihood of a positive outcome.

However, the historical trend of increasing levy rates and the persistent debate over the hypothecation of funds suggest that local governments will need to maintain consistent and strategic advocacy. This is crucial to ensure that waste levy policies genuinely support sustainable waste management and equitable financial outcomes across all regions of NSW, fostering an environment where environmental goals are achieved without disproportionately burdening regional communities.

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