



## Circular economy development policies: Australia's experience and implications for Vietnam

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### Abstract

In light of the escalating frequency and severity of climate change, there exists an urgent necessity for nations to transition towards a more circular economy, thereby mitigating carbon emissions and reducing reliance on limited resources. The extant literature indicates that developing countries have the potential to derive valuable insights from developed nations in the formulation of effective circular economy policies and legislation. Building upon this premise, the present paper investigates critical elements of Australia's circular economy policies, aiming to furnish recommendations for Vietnam. The findings imply that Vietnam stands to gain significantly from the establishment of a comprehensive action plan with clearly defined targets to advance the circular economy. Furthermore, this initiative necessitates the promotion of a consistent strategy across all tiers of government in the implementation of circular economy initiatives, as well as consideration of the introduction of a government-led container deposit scheme featuring financial incentives to bolster recycling efforts throughout the entire community.

**Keywords:** Australia, circular economy, policies, Vietnam

### Introduction

Climate change and the depletion of natural resources are presenting significant challenges to sustainable development both nationally and globally. In response to these issues, the circular economy has been proposed as a progressive economic model to utilize resources most efficiently, minimizing waste generation, and extending the lifespan of products. In contrast to the traditional linear economic approach, which follows the "extract, produce, consume, and dispose" cycle, the circular economy seeks to establish closed loops in which products are reused numerous times and raw materials are recycled sustainably.

The transition from a linear economic model to a circular economy has become an urgent necessity for countries, including Vietnam, for several reasons: (i) The demand for non-renewable resources is rising, while the availability of these resources, particularly minerals, is gradually diminishing; (ii) A significant reliance on imported raw materials from foreign sources may result in political instability on a global scale; (iii) Adverse effects stemming from climate change, such as the increase in greenhouse gas emissions, particularly CO<sub>2</sub>, are contributing to extreme weather conditions and various other serious repercussions; (iv) The potential to generate new economic value in domains such as innovation, product design, recycling, and research and development of products will provide substantial benefits to businesses and communities.

This paper critically examines the comparative strengths and weaknesses inherent in circular economy policies in Australia and Vietnam. The objective is to identify significant policy gaps within Vietnam's circular economy framework. By extracting lessons from Australia's more established circular economy policies, this research aspires to furnish actionable insights and recommendations to fortify Vietnam's approach to sustainable economic development through circular economy practices. Furthermore, this study contributes to the broader discourse on global policy transfer and the transition towards a circular economy.

The remainder of the paper is organized as follows. Section 2 delineates the literature review and the methodology employed to compile studies for the policy review, as well as detailing the execution of the analysis. Section 3 articulates the findings from the policy analysis, with a concentration on: (i) the circular economy legislation in Australia, emphasizing both its merits and drawbacks; and (ii) the current initiatives in Vietnam aimed at fostering a circular economy, scrutinizing their strengths and weaknesses to pinpoint deficiencies within Vietnam's policies. Section 4 offers recommendations for Vietnam, drawing from Australia's experiences, and Section 5 culminates with the paper's conclusion.

### Literature review and methodology

#### 1. Literature review

Although it lacks an official definition, the concept of circular economy is generally understood as an economic model that functions within a spiral-loop system, aimed at minimizing energy consumption, material usage, and environmental detriment, while concurrently promoting social, technological, and economic development (Geng & Doberstein, 2008) <sup>[3]</sup>. In light of the imperative to achieve net-zero emission targets in the near future, the circular economy has garnered considerable interest among scholars and practitioners alike. A query conducted via Scopus using the term "circular economy" in August 2024 revealed more than 36,500 documents. Of these, over 26,500 documents (approximately 73 percent) were published between 2021 and 2024, indicating that the concept has significantly gained traction in academic discussions in recent years. For policymakers across the globe, the subject of circular economy has also risen as a matter of priority. However, there exists a discernible disparity in the level of attention afforded to the circular economy between developing and developed countries. Out of 160 articles on circular economy published between 2006 and 2019, a mere 5 percent focus on developing nations (Kirchherr & van Santen, 2019) <sup>[5]</sup>. Halog et al. (2021) <sup>[4]</sup> support this

perspective, contending that developing countries could adopt certain existing policies related to circular economy from their developed counterparts to address their issues of waste mismanagement.

## 2. Methodology

This paper, constrained by certain limitations, presents a comprehensive literature review grounded in desktop research, concentrating on the laws and policies in Australia and Vietnam concerning the circular economy. Pertaining to Australia, the review encompasses policies across all three tiers of government- federal, state, and local- with a particular focus on waste management policies. This emphasis is warranted, as Australia has recognized effective waste management as a pivotal factor in the transition toward a circular economy. Regarding Vietnam, this paper offers an overview of the existing circular economy policies endorsed by the Communist Party of Vietnam, followed by an analysis of the challenges encountered in the implementation of these policies.

## Results and Discussion

### 1. Australia’s transition to a circular economy

#### 1.1 Summary of circular economy laws in Australia

The Australian Federal Government is resolutely committed to transitioning towards a more circular economy by 2030. This commitment involves collaboration with the private sector to eliminate waste and pollution while ensuring the ongoing utilization of materials. The government has undertaken initiatives to bolster the national waste management sector, a crucial element of the circular economy, to attain this objective. A pivotal aspect of this endeavor is the introduction of the updated National Waste Policy in 2018. This policy recognizes the imperative for Australia to progress towards a circular economy and establishes specified circular economy principles for waste, as delineated in the document (Commonwealth of Australia, 2018) [1]:

- Minimize waste;
- Enhance resource recovery;
- Augment the utilization of recycled materials and cultivate demand and markets for recycled products;
- Optimize material flows to enhance human health, environmental sustainability, and economic growth;
- Strengthen information dissemination to foster innovation, direct investment, and facilitate informed consumer choices.

Subsequently, the National Waste Policy Action Plan 2019 was published to delineate the seven national targets and associated actions aimed at implementing the 2018 National Waste Policy (Commonwealth of Australia, 2019) [2]:

- Prohibit the exportation of waste materials, including plastic, paper, glass, and tires, commencing in the second half of 2020;
- Achieve a reduction in the total waste produced in Australia by 10 percent per capita by the year 2030;
- An average resource recovery rate of 80 percent from all waste streams, in accordance with the waste hierarchy, has been achieved 2030;
- Significantly enhance the utilization of recycled materials by both government and industry sectors;
- Eliminate problematic and non-essential plastics by the year 2025;

- Reduce the volume of organic waste sent to landfill by 50 percent by 2030;
- Ensure the public has access to comprehensive, economy-wide, and timely data, facilitating improved consumer, investment, and policy decisions.

The aforementioned policies have significantly impacted various regulations in numerous states and territories across Australia, particularly concerning plastic use. Notably, South Australia became the first state or territory in Australia to prohibit single-use plastic straws, cutlery, and stirrers in March 2021, following the enactment of the Single-use and Other Plastic Products (Waste Avoidance) Act 2020 (Green Industries SA, 2021). Subsequently, Queensland, the Australian Capital Territory, New South Wales, and Western Australia have enacted comparable legislation. Although Tasmania has yet to implement an official statute, it has proposed a ban on single-use plastic items already prohibited in at least one other Australian state or territory (Department of Natural Resources and Environment Tasmania, 2024).

To facilitate daily recycling efforts within the community, governmental bodies at all levels across Australia have implemented clear and transparent standards regarding recycling bins. Each color denotes explicitly a particular type of waste or material designated for disposal in the corresponding bin (NSW Environment Protection Authority, 2024). Furthermore, at the local government level, most municipalities furnish informative posters and signs to assist residents in managing their waste and recycling effectively (City of Melbourne, 2024).

**Table 1:** The colour – coding system of bins in Australia

| Waste category   | Bin body colour     | Bin lid colour |
|--|---------------------|----------------|
| Garbage  | Dark green or black | Red            |
| Recycling (commingled or containers)                       | Dark green or black | Yellow         |
| Paper and cardboard  | Dark green or black | Blue           |
| Organics (including co-collected food and garden organics) | Dark green or black | Lime green     |

**Source:** NSW Environment Protection Authority (2024)



**Source:** City of Melbourne (2024)

**Fig 1:** City of Melbourne’s recycling poster

A significant initiative undertaken by all state and territory governments in Australia to foster a circular economy is the container refund scheme, designed to mitigate litter and enhance recycling efforts. This program permits individuals to collect eligible empty beverage containers and return

them to a designated refund point, where they will receive a monetary return of 10 cents for each container. Importantly, participants can retain the refund for personal use via bank transfer or store vouchers, or they may choose to contribute to their preferred charities or community organizations by donating. The container refund scheme is recognized by distinct names in each state and territory as follows:

- **Victoria:** Victoria's Container Deposit Scheme
- **New South Wales:** Return and Earn
- **Queensland:** QLD Containers for Change
- **Tasmania:** Recycle Rewards
- **Northern Territory:** NT Container Deposit Scheme
- **ACT:** ACT Container Deposit Scheme
- **South Australia:** SA Container Deposit Scheme
- **Western Australia:** WA Containers for Change

In February 2023, the Australian government consolidated its commitment to the CE transition by establishing the Circular Economy Ministerial Advisory Group. This Advisory Group advises the Minister for the Environment and Water on CE-related issues with evidence-based research and consultation (Department of Climate Change, Energy, the Environment and Water, 2024).

## 1.2 Strengths and limitations of Australian circular economy laws

The circular economy legislation in Australia offers numerous advantages. Firstly, it is evident that the Australian government has developed a comprehensive action plan to facilitate and expedite the implementation process of circular economy laws. This strategy has demonstrated success, as governmental bodies have launched numerous initiatives and programs at various levels. Secondly, despite the presence of self-governing states and territories, Australia has effectively consolidated its efforts to transition towards a circular economy. Although each jurisdiction independently governs its circular economy laws, coherent recycling strategies are being systematically introduced nationwide. This coordinated approach extends to the municipal level, wherein councils actively promote recycling through educational initiatives directed at residents. Thirdly, Australia exemplifies that recycling can be further incentivized through financial mechanisms, as illustrated by the container deposit scheme. The Australian container deposit scheme has been demonstrated to be effective in promoting increased recycling rates among the population, with New South Wales and Queensland experiencing reductions in beverage container litter of 30 percent and 35 percent, respectively, within the first year of implementation (Exchange for Change, 2018; Containers for Change Queensland, 2019). Furthermore, this scheme yields considerable benefits for the community, as numerous residents opt to donate their refund money to charitable organizations. Non-profit organizations also regard the scheme as a significant fundraising mechanism, facilitating their efforts to generate financial support from the community for various noble causes. The economic viability of the container deposit scheme has likewise been substantiated in the state of Victoria, where it has achieved a benefit-cost ratio of 1.33. It indicates that for every dollar invested in the program, the anticipated dollar benefits produced amount to \$1.33. The scheme's most notable advantage is its effectiveness in reducing litter, with an

estimated benefit valued at \$725.1 million over a 20-year timeframe (Department of Environment, Land, Water and Planning Victoria, 2022).

It is important to recognize that the implementation of circular economy legislation in Australia is not without its imperfections. Halog et al. (2021)<sup>[4]</sup> observe that Australia's circular economy laws are comparatively more conservative than those of European nations, a situation attributable to the country's relatively small yet geographically dispersed population and its dependence on resource extraction within the mining sector. Furthermore, given that the primary responsibility for environmental management resides with state governments in Australia, it is apparent that individual states adopt diverse strategies and timelines in addressing environmental matters. This discrepancy may pose significant challenges for governance, particularly concerning the coordination of reporting and monitoring outcomes, and could also lead to complications for residents relocating between states.

## 2. Vietnam's circular economy legal framework

### 2.1 Overview of circular economy initiatives and policies in Vietnam

In Vietnam, the advancement of a circular economy has been acknowledged as a crucial strategy for proactively addressing climate change, ensuring sustainable management, optimizing resource utilization, and protecting the environment. In accordance with the party's perspectives and policies, and under the guidance of the principles established in the resolution on circular economy development from the 13th National Congress, numerous legal documents pertaining to circular economy have been promulgated, including:

Firstly, with respect to the overarching regulations pertaining to the circular economy

The notion of the circular economy is articulated in Clause 1, Article 142 of the Law on Environmental Protection 2020: "Circular economy is an economic model whereby design, production, consumption, and service activities are oriented towards minimizing the extraction of raw materials and resources, prolonging the product lifecycle, reducing waste generation, and mitigating adverse environmental impacts." This definition of the circular economy delineates a singular objective; however, it fails to encapsulate the essence of the circular economy as a process that necessitates the continuous design and operation of materials in closed loops. Furthermore, Decree No. 08/2022/ND-CP offers detailed guidance regarding the circular economy in Articles 138, 139, and 140.

The fundamental criteria for a circular economy are delineated in Clause 1, Article 138 of Decree No. 08/2022/ND-CP as follows:

- a. To diminish the extraction and utilization of non-renewable resources and water resources; to enhance the efficiency of the use of resources, raw materials, and materials while promoting energy conservation;
- b. To extend the lifespan of materials, equipment, products, goods, components, and structures;
- c. To limit waste generation and mitigate adverse environmental impacts, including: the reduction of solid waste, wastewater, and emissions; the minimization of the use of harmful chemicals; the recycling of waste and recovery of energy; the reduction of single-use products; and the encouragement of environmentally sustainable shopping practices."

Vietnam's approach to the circular economy has predominantly concentrated on the preservation of the environment. There exists a considerable deficiency of specialized legal regulations aimed at promoting the circular economy, as this topic is only occasionally referenced in select legal documents. These references include Article 3 and Article 16 of the Investment Law of 2020; Decree No. 82/2018/ND-CP, dated May 22, 2018, issued by the Government concerning the management of industrial parks and economic zones; the Law on Enterprises of 2020; the Law on Support for Small and Medium Enterprises of 2017; Article 11 of the Law on Technology Transfer of 2017; and the Law on Intellectual Property, revised and supplemented in 2022.

Second, concerning the economic instruments related to environmental protection and the transition to a circular economy

The Law on Environmental Protection 2020 acknowledges the critical significance of economic instruments in the realm of environmental management, as stipulated in Section 1, Chapter XI. This is explicitly referenced in Article 91, which deals with the reduction of greenhouse gas emissions; Article 136, concerning policies related to environmental protection taxes and fees; Article 137, which pertains to the payment of deposits aimed at environmental protection; Article 138, addressing the payment for services related to natural ecosystems; and Article 140, which outlines liabilities regarding insurance against environmental damage.

Third, concerning the incentive mechanism for promoting a circular economy

The government of Vietnam places significant emphasis on investment in formulating a circular economy law through various initiatives. Notably, this includes Decision 2178/QD-TTg, effective December 21, 2020, issued by the Prime Minister, which endorses the project titled "Enhancing the database of natural resources and the environment in conjunction with the information systems and databases of ministries, sectors, and localities". Organizations and individuals engaged in activities and projects that implement the principles of the circular economy model are eligible to receive various incentives and support. These incentives include investment incentives, tax benefits, fee reductions, subsidies for environmental protection products and services, promotion of green credit initiatives, and encouragement of green bond investments. The government advocates for additional activities related to the circular economy, as outlined in Clause 3, Article 140 of Decree No. 08/2022/ND-CP. Such activities encompass researching and developing technology and technical solutions; developing models for the linkage and sharing of circular use of products and waste; applying measures of industrial symbiosis by legal provisions governing the management of industrial parks and economic zones; and fostering international cooperation, experience exchange, knowledge sharing, and technological advancements in the circular economy domain, adhering to applicable legal standards.

Fourth, regarding the law enforcement institutions that underpin the circular economy

The Government of Vietnam is responsible for the comprehensive oversight of the national economy, which encompasses the transition towards a circular economy. Various ministries, ministerial-level agencies, and

provincial People's Committees are assigned the task of state management to promote the circular economy within their respective domains and localities, thereby encouraging effective collaboration in implementation. The Ministry of Natural Resources and Environment is entrusted with presenting the National Action Plan for implementing circular economy regulations to the Prime Minister for formal promulgation. It assumes a critical role in the advancement of circular economy initiatives.

Fifth, with respect to the regulatory measures implemented to ensure the enforcement of circular economy legislation Promoting and disseminating the circular economy is the responsibility of the entire political system, with the government assuming a central role as stipulated in Clause 1, Article 3 of the Law on Dissemination and Education of Law 2012. The responsibilities of enterprises, communities, households, individuals, mass organizations, and officials engaged in the advocacy of a circular economy are primarily articulated in the Law on Environmental Protection 2020.

## **2.2 Strengths and limitations of Vietnamese circular economy laws**

Recent advancements in circular economy initiatives have resulted in significant achievements within Vietnam. Various economic models that align with the principles of a circular economy, including the garden-pond-cage, forest-garden-pond-cage, garden-pond lake, eco-industrial parks, and cleaner production methods, have been developed nationwide. Following the execution of a pilot eco-industrial park model from 2015 to 2019 across four industrial parks (Khanh Phu and Gian Khau in Ninh Binh; Hoa Khanh in Da Nang; Tra Noc 1 and Tra Noc 2 in Can Tho), the Ministry of Planning and Investment has, since 2020, maintained its collaboration with UNIDO to replicate this model in additional areas including Hai Phong, Dong Nai, and Ho Chi Minh City. Consequently, a total of 603 resource efficiency and cleaner production (RECP) solutions have been proposed in three industrial parks: Hiep Phuoc (Ho Chi Minh City), Amata (Dong Nai), and Dinh Vu (Hai Phong). Significant progress has been achieved in diminishing the exploitation of non-renewable resources while concurrently promoting the utilization of renewable energy sources and raw materials. The Ministry of Natural Resources and Environment has proactively decommissioned outdated mineral extraction and processing facilities, which are detrimental to environmental integrity. This action supports the sustainable exploitation and processing of minerals and advances the principles of a circular economy.

Regarding renewable energy, by the conclusion of 2020, Vietnam's total renewable energy capacity achieved approximately 6,000 MW, with 5,290 MW generated from solar power and 500 MW from wind power. The electricity produced from renewable sources rose to approximately 8 billion kWh, representing 2.53 percent of the total national electricity output for the year 2020.

Efforts to enhance the collection of household waste and implement effective waste sorting at the source have shown significant progress. As reported by the Hanoi Department of Construction, the rate of household solid waste collection within the city has reached 85.5 percent, corresponding to a daily collection volume of 7,300 tons. This rate exhibits variations across different areas, with the central districts achieving a collection rate of 100 percent, whereas the suburban districts report a collection rate of 88 to 89

percent. All collected waste is processed in accordance with established standards, with the majority of waste being treated at the Nam Son Waste Treatment Complex (approximately 5,500 tons per day) and the Xuan Son Solid Waste Treatment Area (approximately 1,500 tons per day). In Da Nang City, a pilot initiative sponsored by the Japan International Cooperation Agency (JICA) aimed at classifying solid waste at the source was commenced in 2017 within the Thuan Phuoc and Thach Thang wards. By June 2018, over 80 percent of residential areas had successfully adopted waste sorting protocols, and by 2019, Da Nang attained a 100 percent waste collection rate, the preeminent standard in the nation.

The formal acknowledgment of the circular economy model within the policies and guidelines of both the political party and state, particularly through its legalization, establishes a robust foundation for the future enhancement of circular economy initiatives. Vietnam is one of the pioneering nations in the ASEAN region that incorporated regulations regarding the circular economy in the Law on Environmental Protection. The nation's compliance with international obligations and its engagement in bilateral and multilateral agreements such as the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) and the European Union-Vietnam Free Trade Agreement (EVFTA) have fostered conducive conditions for advancing circular economy development. Nevertheless, the circular economy's legal framework remains fragmented and disorganized across various legal documents.

A significant impediment to implementing the circular economy model in Vietnam is the relative novelty of the circular economy regulations stipulated in the 2020 Law on Environmental Protection. The existing regulations often lack coherence between environmental laws and those governing land, investment, enterprises, taxes, and technology, which hinders the promotion of circular economy development projects. Presently, the legal documents concerning circular economy development address overarching principles and orientations, thereby necessitating the establishment of specific regulations and guidelines for effective implementation. Establishing thorough standards, institutions, enforcement mechanisms, monitoring, and evaluation systems for each industry and field necessitates a significant allocation of resources and time. Furthermore, existing regulations have not successfully motivated innovation and creativity in production, nor have they cultivated a robust sense of social responsibility among individuals and organizations in pursuit of the objectives of a circular economy.

Secondly, there is a deficiency of policy mechanisms to promote the circular economy, particularly regarding the concretization of Extended Producer Responsibility (EPR), accompanying tools, and investment incentives. Additionally, adequate incentives for businesses, such as resource taxes, environmental protection fees, support for technology access, and workforce training, are notably insufficient. Furthermore, the absence of effective connections between businesses and manufacturers complicates the product consumption phase. Furthermore, specific regulations are lacking to guide enterprises, industrial parks, municipalities, and various sectors in implementing circular economy models throughout all process stages. The circular economy framework encompasses stages such as design, reuse, sharing, repair,

refurbishment, remanufacturing, and recycling, which collectively contribute to the establishment of closed loops within the circular economy model.

Thirdly, Vietnam experiences a deficiency in businesses possessing adequate technological capacity for recycling and reusing products, while small and medium-sized enterprises encounter obstacles in investing in technological innovation. Furthermore, information systems, data management, and sharing mechanisms are insufficient for effectively monitoring and evaluating progress toward the objectives of a circular economy.

Fourth, accurately comprehending the circular economy necessitates consensus and unity among leaders, management tiers, enterprises, and individual citizens. Moreover, infrastructure and industrial park planning directed towards a circular economy and overall connectivity continue to be insufficient. Numerous disjointed plans arise from a linear economic development perspective, which is characterized by a lack of integration and fails to harmonize with resource equilibrium and sustainable resource utilization.

Fifth, the implementation of the circular economy is impeded by lacking an organizational system, highly qualified human resources, a comprehensive data information system, and a mechanism for monitoring and supervising progress. Consequently, a dedicated agency has to coordinate implementing circular economy plans. Vietnamese legislation does not provide a clear and specific mechanism for managing implementation; it primarily focuses on organizing the development and issuance of a framework to guide and evaluate progress. It fails to address the inspection and supervision of pertinent stakeholders. Furthermore, resources allocated for transitioning to a circular economy remain insufficient. The successful development of a circular economy must be associated with scientific innovation and access to advanced technology. Additionally, developing a circular economy necessitates a team of skilled experts capable of addressing challenges throughout the process.

In conclusion, numerous environmental protection policies are deficient in the necessary conditions for effective implementation. These deficiencies include insufficient support for waste collection and management in rural areas, inadequate promotion of biogas usage, lack of clean production initiatives, and an absence of community-based resource management. Furthermore, the existing tax and fee regulations do not adequately align with practical needs. The tax rates established under the 2009 Law on Natural Resources Tax primarily emphasize regulating high-value resources, specifically through the rates applied to non-metallic minerals and crude oil. This focus fails to adequately address the imperative to restrict resource exploitation and foster environmental preservation.

### **Recommendations for Vietnam's circular economy legal framework**

This paper presents three practical implementation recommendations for Vietnam based on critical elements of Australia's circular economy policies.

Initially, Vietnam should implement a national policy to facilitate the transition to a circular economy. This policy should underscore the significance of a circular economy while delineating precise action plans and specific objectives for Vietnam to attain within an established timeframe.

Secondly, it is essential to achieve alignment among the lower levels of government in implementing circular economy initiatives. While municipalities, provinces, and even individual cities and towns may develop their initiatives and programs to facilitate the transition to a circular economy, all levels of government must adhere to a unified direction, irrespective of the specific policies implemented. Moreover, in light of the lessons learned from the challenges posed by the disparate timelines for the adoption of circular economy policies across Australia's states and territories, which complicate the monitoring and reporting processes, Vietnam's administrative units must synchronize their timelines for circular economy regulations to ensure consistency and efficiency.

Thirdly, Vietnam should consider implementing a government-led container deposit scheme to promote daily recycling practices among its residents. Many individuals in Vietnam are already engaged in recycling plastic containers and paper through informal waste workers who collect and sell these materials domestically. Nevertheless, this process has taken place with minimal to no guidance from governmental authorities, resulting in a deficiency of structure and consistency regarding recycling plastic and paper items. Consequently, it is recommended that the government intervene to centralize the collection of recyclable items in Vietnam and provide monetary incentives in exchange for the recycled materials submitted by residents.

### Conclusion

This paper provides a comprehensive review and evaluation of Australia's current circular economy policies. Additionally, it summarizes key Vietnamese policies that support the concept of a circular economy, while also identifying limitations within Vietnam's legal framework for development. These limitations encompass a deficiency of policy mechanisms designed to promote the circular economy, a scarcity of enterprises equipped to recycle and reuse products, and a lack of consensus regarding the understanding of the circular economy among policymakers and the general public.

The study subsequently indicates that numerous strengths of Australia's policy framework may serve as invaluable lessons for Vietnam, thereby enhancing the development of its circular economy legal framework. The principal recommendations for Vietnam include establishing a comprehensive circular economy policy, ensuring consistency across various governmental levels, and providing financial incentives to promote public engagement in recycling initiatives.

Future research should explore the possibility of broadening the scope of this study to encompass case studies from additional countries and may also include a quantitative analysis of pertinent circular economy data.

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