

Submission to Infrastructure Victoria

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Q1. A bit about you. Who is writing this idea? If you are submitting on behalf of an organisation please also identify this here.

Australian Council of Recycling, [REDACTED]

Q2. What matters to you?

Please see attached document for ACOR's submission

Q3. Your proposed ideas: What strategic idea/s are you proposing for the 30-year infrastructure strategy that will achieve your desired outcomes?

Q4. Why do you think your proposed ideas are better than the other options you might have considered?

Q5. What sources of information do you think Infrastructure Victoria needs to consider when developing the 30-year Infrastructure Strategy for Victoria?

<https://engage.vic.gov.au/dash/project/1223/submission/survey/1107957/attachment/dXBsb2FkOjIwMjMtMDItMTIUMTE6MDg6MjEuNTMxWg==0-230601-acor---30-year-infrastructure-strategy-submission.pdf/download>

Q6. How are the documents or information you have shared relevant to your idea?

1 June 2023

Infrastructure Victoria
Level 33, 140 William St,
Melbourne VIC 3000

via: engage.vic.gov.au/project/victorias30yearinfrastructurestrategy/survey

To whom it may concern

Victoria's 30-year infrastructure strategy

On behalf of the Australian Council of Recycling (ACOR), we welcome this opportunity to inform Victoria's review of the 30-year infrastructure strategy (the Strategy).

ACOR is the peak industry body for the resource recovery, recycling, and remanufacturing sector in Australia. Our membership is represented across the recycling value chain, and includes leading organisations in advanced chemical recycling processes, CDS operations, kerbside recycling, recovered metal, glass, plastics, paper, textiles and e-product reprocessing and remanufacturing, road recycling and construction and demolition recovery. Our mission is to lead the transition to a circular economy through the recycling supply chain.

Recycling is an integral gear within the circular economy, delivering significant social, economic and environmental value. The Australian recycling industry contributes almost \$19 billion in economic value, while delivering environmental benefits such as resource efficiency and diversion of material from landfill. One job is supported for every 430 tonnes of material recycled in Australia. The industry operates across our homes, businesses, factories and construction sites. It collects, sorts and reprocesses material, and makes new products with recycled content, creating more jobs for Australians.

Policy drivers underpinning recycling and a circular economy

The policy environment for circular economy and recycling across Australia is rapidly evolving, with the implementation of [climate change targets](#), [National Waste Policy](#), the [Modern Manufacturing Strategy](#), an [export ban on recyclable materials](#) and, most recently, a [national commitment to a circular economy](#).

In October 2022, Australia's Environment Ministers committed Australia to achieving a circular economy by 2030, by designing out waste and pollution, keeping materials in use longer and fostering end markets for recycled material. We are pleased to be represented on the [Circular Economy Ministerial Advisory Group](#), guiding Australia's transition to a circular economy.

Every available lever will be needed to achieve this transformation – particularly in light of the fact that Australia is currently falling short in progressing key targets in the [National Waste Action Plan](#). The 2022 [National Waste Report](#) found recovery rates for household waste have stagnated while commercial and industrial waste recovery rates have declined.

Investment in advanced recycling technologies is also essential to address the federal [Minister's Priority List](#) for product stewardship action, including photovoltaic systems, electrical and electronic products, clothing textiles and problematic and unnecessary single use plastics. Addressing organic waste will also be critical in reducing climate emissions towards net zero.

Recycling and clean energy has also been identified as a focus for research in the 2021 [National Research Infrastructure Roadmap](#). To meet future demand while pivoting to cleaner energy and fuel sources, we must leverage greater resource efficiency through recycling.

One impediment to informing strong policy and investment decisions is poor data and information: waste management and recycling are distinct activities, however, data has historically conflated these two sectors, so that the true capacity for recycling and re-manufacturing infrastructure across Australia is not well mapped. Logistics operators, aggregators, processors and remanufacturers are often defined as one group in datasets, masking genuine capacity and the value chain required to deliver recycling outcomes.

Investment in a Victorian circular economy

A Victorian circular economy will reduce supply chain vulnerabilities but will require a transformation of the state's economy with the creation of new industries, including new collection and recycling infrastructure and remanufacturing of recycled materials, noting that recycling comprises three essential processes: collection, processing and end markets. If any one element is missing, recycling cannot occur.

Since 2020, [Australia has restricted the export of unprocessed recyclable materials](#) including glass, tyres, plastic and (in 2024) paper. It is therefore imperative to ensure necessary infrastructure exists to transform these recovered resources into higher value commodities for domestic and international markets.

Barriers to private sector investment in recycling include the complex and fragmented regulatory environment between the states and territories, the low cost of landfilling – which diverts material away from recycling – and the relatively low value of recovered material. Targeted funding is an important lever to enabling the significant scale required to address these barriers; noting that the regulatory framework must also be addressed. In particular, the Victorian Government must work with the other states and territories and the federal government to prioritise a nationally harmonised regulatory framework for resource recovery and recycling.

And while a new era of productivity and innovation in recycling can be spurred by strong investment, there are also current barriers to strong market uptake of recycled material. These includes cost competitiveness with virgin materials and willingness within the supply chain to embrace change. Infrastructure Victoria's 30-year strategy must more strongly support implementation of [Victoria's Recycled First Policy](#) to enable circular processes and uptake of recycled content. In particular, a recent joint report released by Standards Australia and ACOR, '[Standards to facilitate the use of recycled material in road construction](#)' details the opportunities, value and approaches in using recycled material in road construction, as well as the specifications that form barriers to uptake.

As waste is generated by all forms of production, there is an opportunity to fund infrastructure that supports sustainable outcomes at every stage of product life cycles, including design and manufacture, all the way through to collection, sortation, decommissioning, reprocessing and remanufacturing. The area of renewables and low emissions technologies has been identified as a growing priority. Infrastructure to recover and recycle these technologies at end-of-use must be scaled up.

Investment in recycling infrastructure sits squarely within the four focus areas of Infrastructure Victoria's 30-year strategy: of doing more with less; navigating change and disruption; improving social equity through access; and mitigating and adapting to a changing climate. Our members bring considerable real-world resource recovery and recycling expertise through operating in every jurisdiction in Australia and internationally, and we would be very pleased to facilitate further dialogue and consultation.

Yours sincerely

