**Infrastructure Victoria
Recycling and Resource Recovery Infrastructure Report**

**Submission by Moreland City Council**

Online submission to be uploaded at <http://www.infrastructurevictoria.com.au/project/advice-on-waste-infrastructure-in-victoria/#recovery>

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**Introduction**

Moreland Council welcomes the opportunity to provide a response to the Infrastructure Victoria Recycling and Resource Recovery Infrastructure Report. The subject matter of the report is of critical importance to waste management as part of the urgent transition to a circular economy.

**Moreland City Council context**

Moreland is a municipality in the inner north of Melbourne. Moreland City Council recently adopted the Waste and Litter Strategy 2018 – 2022 which sets an ambitious goal of achieving zero waste to landfill by 2030. It includes a range of initiatives that also help us progress towards our goal of zero carbon Moreland by 2040, including the introduction of a universal kerbside food and garden waste collection. Other areas of concern addressed in the strategy are recycling bin contamination, the elimination of single use plastics at Council events and facilities, and advocating for the state-wide introduction of a container deposit scheme. The vision outlined in the strategy is to move from the current linear economy towards a circular and regenerative economy which, along with our zero waste and zero carbon targets is a key pillar of our Zero Carbon Moreland 2040 Framework.

**General report feedback**

Moreland City Council welcomes the work undertaken by Infrastructure Victoria with a focus on the infrastructure, regulation and systems needed to improve outcomes in the recycling and resource recovery sector. The analysis presented reflects a thorough understanding of the sector, the market failure that has occurred and a range of opportunities for improvement. Recent events affecting the recycling and resource recovery industry in Victoria have demonstrated several of the many weaknesses in the state’s current waste management system. Over reliance on overseas markets, dangerous levels of stock piling, lack of leadership, investment, policy direction and regulation from state and federal governments, along with an absence of extended producer responsibility for packaging are some of the key issues that need to be addressed.

The closure of SKM by the EPA has left many in the community believing that it is no longer worthwhile separating their recycling from their garbage, as it all ends up in landfill anyway. As this is a state wide change in community view the State Government is in the best position to restore community confidence in the recycling system through sector reform and leading delivery of state wide communications on why recycling is important and the environmental benefits of keeping materials out of landfill.

**Feedback on specific questions**

***Question 1 - Have we identified the right outcomes for Victoria to aim for?***

Council supports all the outcomes identified for Victoria as highlighted on page 13. However, there are gaps in the ultimate outcomes that the following interventions / interim outcomes would help to address:

* Container Deposit Scheme: government, business and consumers
* Extended Producer Responsibility (plastics and packaging): government and business
* Priority focus to divert food and garden organics from landfill: government, business and consumers
* Mandate packaging recyclability/eliminate non-recyclable packaging from circulation: government and business
* Identify target materials based on their carbon impact: government and business

***Question 2 - Have we identified the most effective potential actions for government to take?***

Moreland Council agrees that minimising waste generation needs to be the overarching goal that proposed interventions are geared towards supporting. The four priority areas identified address the key aspects of the sector in need of intervention.

**5.1 Sector-wide improvements**

Moreland Council would welcome an overarching policy framework for waste, recycling and recovery supported by specific targets. Rather than weight-based targets, Moreland Council would prefer to see targets for recovery based on the carbon impact of waste when determining the target materials.

Moreland Council would welcome a state-wide education campaign delivered by state government, with consistent messages across municipal boundaries. The education campaign should not rely on roll out through local government but use high profile (high cost) media channels available at a state and regional level to reach the entire Victorian community with messages applicable to all residents.

Local councils can support and leverage the state-wide campaign, but not be expected to lead it given limited capacity and funding to access mass media channels. The campaign should apply learnings from other successful government campaigns and build on learnings gained through other waste focussed campaigns such as Get it Right on Bin Night and Love Food Hate Waste.

The education campaign needs to be supported by consistency in the systems and services used by residents, which could be improved through state government funding to standardise bin lid colours across municipalities and ensuring at least a base line consistency in recycling contracts and recovery services across the state. Any education campaign needs to include messages on reducing and avoiding waste generation, and not just focus on using bins correctly.

A greater proportion of Landfill Levy funds need to be directed towards increasing resource recovery and improving the capability of the sector. There also needs to be greater transparency about the levy and how the funds are spent.

New state-wide recovery programs such as Detox your Home need to be introduced, with existing programs expanded. Product recovery needs to be funded by the manufacturers with roll out and promotion supported by state and local government.

**5.2 Supporting the reprocessing sector**

Improving the quality of material streams to increase their value to manufacturers is an important undertaking. Explaining to the community why this is important will be necessary when implementing changes to the current co-mingled kerbside system. Landfill Levy funds must be committed to improve sorting and processing capability in Victoria. Increased capacity at materials recovery facilities is needed to remove contaminants and increase the cleanliness and quality of material streams so that they can better compete with virgin materials for manufacturing.

It is disappointing that Victoria is the only state or territory in Australia without a CDS either planned or operating. In addition to improving the quality and value of beverage packaging, CDS has other benefits, it shifts the cost to manage beverage container waste back to the producers and it provides an incentive to consumers to recycle beverage containers thereby reducing litter and increasing recovery. Implementing a CDS in Victoria needs to be a priority action for state government to bring us into line with the rest of the country.

**5.3 Better enable use of products containing recycled materials**

Moreland Council would like to see greater quantities of Landfill Levy funds committed to supporting research and development into new uses for recycled materials. Mandatory procurement targets for Australian recycled content by government departments and agencies would ensure demand for products. MAV could be tasked with developing a guide to procurement options for local government to increase awareness of recycled content products and opportunities for shifting existing procurement arrangements.

The introduction of a “Made with Australian Recycled Content” label would incentivise manufacturers and brand owners to include recycled content in their products and provide a clear option for consumers when purchasing products.

**5.4 Provide clarity to the waste-to-energy sector**

Moreland Council agrees that waste-to-energy is a far less desirable option than waste reduction, re-use and recycling. In line with the objectives of the waste hierarchy and principles of a circular economy, Moreland Council would support the regional development of non-thermal advanced waste processing technologies such as anaerobic digestion and in-vessel composting where the outputs produced can be captured and used.

Moreland Council does not support the development of thermal waste-to-energy technologies such as incineration, gasification, combustion, pyrolysis and plasma arc for the disposal and treatment of waste. Thermal technologies can produce a host of negative environmental impacts including release of toxins into the atmosphere. Such an approach does not align with the goal of creating a regenerative and sustainable system for resource use. Council instead supports the development of technologies that do not create further environmental harm or undermine efforts to recover and recycle materials.

**5.5 Support high levels of recovery for organics, particularly food organics**

Supporting high levels of recovery for organics is an important key priority with the potential to divert 30% - 50% of the municipal solid waste stream from landfill. Moreland Council recently introduced the kerbside collection of food waste via the garden organics bin to reduce waste to landfill and associated emissions. Caddies are delivered with new services or available for collection at customer service centres for existing service users. Demand for the opt-in service has been higher than expected with contamination levels currently low.

Increased separation of this material stream will require additional composting facilities across the state, that can produce a high quality certified end-product, i.e. compost not soil conditioner. New facilities will need to have the capacity to process compostable packaging as well as food waste to support the national 2025 packaging waste target that: *100% of all Australia’s packaging will be reusable, recyclable or compostable by 2025 or earlier*. The inclusion of compostable packaging when commissioning facilities will also enable greater uptake of municipal and commercial food and garden organics services.

***Question 3 - Which, if any, of the initiatives implemented in Wales would you like to see applied in Victoria?***

Moreland Council would endorse State Government setting recovery targets for local government to report against. However, the introduction of fines for inaccurate data reporting or failure to meet targets seems draconian and unhelpful.

For local government to accurately report on recovery and recycling targets there needs to be greater transparency and accountability within the recycling and resource recovery industry.

Access to robust and credible data on market conditions, and costs and revenue within the recycling sector is essential to achieve best value for the community. More transparency on destinations for material streams, reprocessing and recyclability of products and reasons for non-acceptance of certain items is necessary for credible communication from local government to residents.

Councils can only provide collection and recovery services based on the infrastructure available to them and are generally not able to procure the necessary infrastructure given the cost involved in such undertakings.

Local small-scale plants could be considered if funding were available from state government for their development along with guidance from the appropriate state departments on managing capacity, buffer zones, noise, smell and any other potential community impacts.

A more consistent approach to sorting and collection across municipalities, supported by ongoing education and engagement campaigns developed and delivered by state government would enable higher rates of resource recovery through greater community awareness.

***Question 4 - What do you think of the market design opportunities proposed to improve waste sector outcomes and efficiency?***

Of the proposed improvement to Victorian recycling infrastructure scenarios the favoured approaches by Moreland Council would be:

* to prioritise the recovery of food organics from households and business/industry;
* to ban the export of waste to improve on-shore recovery and recycling along with the growth in the use of recycled products domestically;
* for Victoria’s Circular Economy policy to guide the improved co-ordination of policy, technology, extended producer responsibility and behaviour for the avoidance of waste generation, introduction of a CDS, state-wide fogo collections and expansion of small-scale reprocessing;
* to introduce import restrictions on packaging waste, along with a widely scoped mandatory CDS and single use plastics ban to drive the domestic focus on recovering and recycling this waste stream.

***Question 5 - Where do you think government should focus their efforts to increase recycling and resource recovery? (for example, through setting targets, promoting consistency or funding local councils?)***

Several of the infrastructure improvements proposed on page 23 under the headings Kerbside and C+I materials, Organics and E-waste would see significant improvements across the sector. The focus for state government needs to be on increasing capability of sorting and recovery through investment in high tech infrastructure (ensuring accessibility to all municipalities across the state) and greater oversight of the material throughputs through increased regulation and mandatory measures.

State Government must also advocate to Federal Government for mandatory product stewardship for all products that generate waste. Clear and binding targets need to be included within the *Product Stewardship Act* to drive action by industry. This action would align with the polluter pays principle, incentivising designers and producers to take responsibility for the environmental impacts of their products. This needs to be coupled with greater integration between the manufacturing and recycling industries to eliminate all non-recyclable packaging. Achieving a reduction in waste generation will require waste to be designed out of production, with products and materials designed for reuse, repair, recovery and remanufacture.

In partnership with the Federal Minister and other State and Territory Ministers the *National Environment Protection (used packaging materials) Measure 2011* must be updated to impose mandatory participation and binding obligations across the consumer packaging chain. As an interim measure the obligations on industry must be clarified so that it is easier to hold them to account.

State Government must advocate to Federal Government to ban the production and importation of hard-to-recycle materials and products. Also, to mandate adoption of the Australasian Recycling Label (ARL) for all consumer packaging sold in Australia, and adopt a certification system for recycled content in line with the US or European models.

In partnership with the Federal Minister and other State and Territory Ministers an action plan must be adopted for the National Waste Policy that includes firm and ambitious targets and timelines that fast track our transition to a circular economy. This would include steps to introduce tariffs on the importation of virgin materials for manufacturing to incentivise use of locally produced recycled feedstock in manufacturing.

***Question 6 - Which materials or infrastructure types present the most opportunity in your region?***

Moreland Council recently introduced the kerbside collection of food organics via the garden waste bin. The increased collection of this material stream from food businesses and multi-unit developments presents a significant opportunity for this municipality. There is however limited capacity in the organics reprocessing sector in the northern metro region. The facility closest to us does not accept compostable packaging which means compostable bags are not an option for our residents, this impacts on willingness to use the service and our potential to reach optimal diversion rates. Contamination poses risks to the quality and value of the end product. Improvements are needed for front end sorting to remove contaminants, to increase the resilience of the processing facility and also to guarantee the quality of the final product.

New facilities will be needed to manage demand as more municipal kerbside organics collections are introduced. These facilities will need to be able to process compostable packaging as well as food waste to support the national 2025 packaging waste target that: *100% of all Australia’s packaging will be reusable, recyclable or compostable by 2025 or earlier*. The ability to process compostable packaging will enable greater uptake of municipal and commercial food and garden organics services.

***Question 7 - What is a legislative barrier or enabler that you have encountered when trying to use recycled materials?***

Increasing the use of recycled content products by local government could be assisted through the reestablishment of the Local Government Buy Recycled Alliance facilitated by MAV. This would introduce councils to products available on the market as well as any opportunities to participate in product trials.

Unrelated to using recycled content products but relevant to progressing waste avoidance, there is a lack of guidance from the Department of Health and Human Services on the use of bring your own containers for take away food and other products such as meat and dairy, causing confusion for retailers and limiting up take and promotion of BYO containers as an option. Additionally, DHHS could provide guidelines to local government environmental health departments on how Council and the community can utilise safe and hygienic wash stations at community events to eliminate single use packaging whilst ensuring public health is not compromised.

***Additional comments***

Moreland Council implores the Victorian Government to act urgently to reduce the environmental impacts of our current linear economy and move swiftly towards a circular and regenerative economy to reduce waste and the squandering of finite resources. Council also urges the state government to listen and act on feedback from local government in order to establish and maintain an efficient, sustainable and environmentally responsible approach to recycling and resource recovery and solid waste management across the state.