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Dear Michael

Feedback – Recycling and resource recovery infrastructure: Evidence base October 2019

Thank you for the opportunity to provide feedback in regard to the infrastructure requirements concerning waste management in Victoria.

After reviewing both the main Evidence base report (hereafter referred to as the Report) and the technical reports, Mount Alexander Shire Council (MASC) would like to echo the sentiments of the Municipal Association of Victoria (MAV) as expressed in their submission. Supporting the MAV submission, MASC would like to extend the following specific feedback.

Resource Recovery – Organics

The focus on supporting high levels of resource recovery for organics, as per the terms of reference for advice to provide The Government is encouraging. Infrastructure that can process organic waste into a high value product for improving soil nutrients and soil structure should be the main objective for ensuring organic collection systems (e.g. FOGO) are viable. Advice to Government should focus on stream lining and incentivising the establishment of more organic recycling facilities and ensuring that the operation of such facilities is not over burdened with regulation.

Container Deposit Scheme

The fact that the Report mentions very little of a Container Deposit Scheme (CDS) is disappointing. Omitting proper investigation of a CDS for Victoria and stating “it has promise but needs more analysis” highlights a missed opportunity. The Report fails to convey the impact of CDS in other states and therefore fails to provide advice on the required infrastructure that would enable a system/ scheme to be adopted here in Victoria. The evidence that a CDS would reduce occurrences of litter and increase the recycling rate of drink containers is overwhelming.

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Waste management infrastructure in regional areas

As noted in the Report, the cost of recycling in regional and rural areas limits opportunities for resource recovery. Transport costs, remoteness and lower economies of scale all present challenges. This is one of the more obvious infrastructure gaps that needs to be addressed. Investment in waste infrastructure in regional Victoria has the potential to create local employment as well as markets for recycled products within the region. If a greater allocation of money from the Sustainability Fund was directed towards establishing recycling infrastructure across the state (for example, grant applications for innovative organic processing facilities or material separation facilities) this would incentivise investment from the private sector. The development of more 'recycling hubs' in locations such as Mildura, Bendigo, Ballarat will provide increased resource recovery opportunities for households and businesses outside of Melbourne.

Infrastructure Victoria should also advise the Government with specific recommendations on the planning stage of infrastructure provision. The challenges of buffer zones and encroachment of residential areas on waste management facilities needs careful management. Ensuring waste management facilities can operate as normal and not be subject to the threat of zoning changes or residential encroachment is an issue that requires more attention.

Waste to Energy

Whilst Energy from Waste (EfW) has a role in waste management in Victoria, it should not be seen as a panacea to the current issues in waste management. EfW must be considered in terms of the waste hierarchy as being only just preferable to disposal to landfill. As outlined in the Report, one of the potential actions is "supporting a waste-to-energy sector that prioritised (sic) the extraction of recyclable material and recovers energy only from residual waste". Needless to say the regulatory framework for EfW facility operators needs to be clear and robust. One of the issues that make EfW less appealing and hinders infrastructure development is the necessity of long term contractual obligations and the fact that improvements in innovation, behaviour change and technology could further reduce the allure of EfW infrastructure.

Product Stewardship

The viability of increased investment in waste infrastructure in Victoria will be aided by a more rigorous and encompassing product stewardship program. Consumers have a responsibility to manage waste but so too do designers and manufacturers. A product stewardship framework combining regulation and incentives will encourage a market system that is more focussed on the whole-life-costs of a product. With greater consideration of life cycle analysis, building in the costs of end of life product management (waste management) will help to encourage new markets and provide opportunities for investment in the waste infrastructure required to manage or recycle these products.

The Victorian Government has recently rehashed pre-existing resource recovery concepts to promote the roll out of a "circular economy". Essential for successful implementation will be the need for policies or schemes of extended producer responsibility and product stewardship.

In summary, urgent action is required to improve waste management in Victoria and more broadly in Australia. Infrastructure Victoria can help by recommending Government invest funds to improve resource recovery drawing on examples of best practice and obtaining expert advice.

Thank you for the opportunity to provide feedback and I look forward to the Government taking action on the advice provided in April 2020.

Yours sincerely

MICHAEL SCOTT
Coordinator Waste and Recycling