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**Submission to**  
**Victorian Legislative Council Inquiry into Recycling and Waste Management**  
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This submission is not confidential

The following are Planet Ark's responses to the terms of reference:

1. The responsibility of the Victorian government to establish and maintain a coherent, efficient and environmentally responsible approach to solid waste management across the state, including assistance to local councils:
  - Waste and recycling are primarily a state jurisdictional responsibility
  - Local councils are also a state jurisdictional responsibility
  - Having said that, it's important that we recognise that with a population of 25 million, we need harmonisation and cooperation between state jurisdictions, as highlighted in the updated National Waste Policy, which was signed off by the Meeting of Environment Ministers in December 2018.
  
2. Whether the China National Sword policy was anticipated and responded to properly:
  - **Anticipated:** No, it wasn't, which is a major failure as it was common knowledge that around 50% of our recyclate was exported, with the majority of that to China
  - **Responded to:** Australia as a whole has responded very slowly:
    - China announced its policy in July 2017. By September 2017, the European Commission had already done a fact-finding visit to China to understand the ramifications of National Sword. The policy commenced on 1<sup>st</sup> January 2018 but the first meetings in Australia were held towards the end of February 18. The difference is that Europe went out before the event, and Australia reacted after the fact.
    - Overall the Victorian response has been slow and poor, but not much behind other major jurisdictions
  
3. Identifying short and long-term solutions to the recycling and waste management system crisis, taking into account:

Item	Short Term: < 12 months-18 months	Long Term: > 18months
a. The need to avoid dangerous stockpiling and ensure recyclable waste is actually being recycled	<ul style="list-style-type: none"> <li>• We agree that we need to avoid dangerous stockpiling</li> <li>• Some stockpiling will be necessary while solutions</li> </ul>	<ul style="list-style-type: none"> <li>• Develop markets, predominately in Australia, particularly for problematic</li> </ul>

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	are being developed, assuming stockpiles are appropriately managed and regulated	materials i.e. mixed plastics and low-grade fibre
b. The cleaning and sorting capabilities and the processing capabilities in Victoria and the potential to expand the local recycling industry	<ul style="list-style-type: none"> <li>• Improve recycling at kerbside through better education and harmonisation, and support of <u>Australasian Recycling Label</u></li> <li>• MRF sorting infrastructure upgrades</li> </ul>	<ul style="list-style-type: none"> <li>• Implement CDS to align with national approach</li> <li>• Need to improve recycling at kerbside through better education and harmonisation</li> <li>• Support technologies that can solve the problem: <ul style="list-style-type: none"> <li>○ Sorting technologies for mixed plastics as in SA</li> <li>○ Chemical recycling processes e.g. <u>Licella</u></li> </ul> </li> </ul>
c. How to better enable the use of recycled materials in local manufacturing	<ul style="list-style-type: none"> <li>• Implement recycled content procurement policies being developed in the National Waste Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Increase the percentage minimum recycled/recovered content as per <u>National Waste Policy</u></li> </ul>
d. The existing business model and economic challenges facing the existing industry The existing business model had three shortcomings: <ul style="list-style-type: none"> <li>• Relied too heavily on export markets</li> <li>• Relied too heavily on a single market customer i.e. China</li> <li>• Little industry investment in ensuring the quality of recyclate would continue to meet market needs</li> </ul>	<p>Solutions:</p> <ul style="list-style-type: none"> <li>• Find best markets that have a genuine need for our recyclate, and supply them in a form that is compatible with their processes</li> <li>• Maximise domestic markets by providing incentives for manufacturers and brand owners to incorporate recycled content into their products e.g. infrastructure or equipment grants, tax incentives</li> </ul>	<ul style="list-style-type: none"> <li>• Develop more sophisticated source separation systems</li> <li>• Create an R&amp;D fund for development of higher value output streams using Circular Economy principles as per UNSW <u>SMaRT Centre</u> model</li> <li>• Mandated procurement including recycled content by local and state government departments</li> <li>• Financial incentives for businesses to conduct waste audits with assessors that recommend solutions to business waste (like <u>NSW's Bin Trim program</u>)</li> </ul>
e. The quantifiable benefits, including job creation and greenhouse gas emissions reduction, of pursuing elements of a circular economy in Victoria	<ul style="list-style-type: none"> <li>• Commission a new study to update the NSW EPA's <u>Benefits of Recycling (2010)</u></li> </ul>	<ul style="list-style-type: none"> <li>• A 2009 report for the The Department of the Environment, Water, Heritage and the Arts titled <i>Employment in waste management and recycling</i>: "The estimated direct FTE employment per 10,000 tonnes of waste is 9.2 for recycling and 2.8 for landfill."  <ul style="list-style-type: none"> <li>• For GHG emissions savings, see NSW EPA's <u>Benefits of Recycling (2010)</u></li> </ul> </li> </ul>
f. The existing <u>Sustainability Fund</u> and how it can be used	<ul style="list-style-type: none"> <li>• Allocation to waste and recycling is way too low in relation to the size of the problem i.e. \$30.4m over 4 years or \$7.6m p.a. Almost</li> </ul>	

to fund solutions to the waste crisis	half is for e-waste ban, leaving only \$3.85m p.a. for other waste and recycling support
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4. Strategies to reduce waste generation and better manage all waste such as soft plastics, compostable paper and pulp, and commercial waste, including:

Item	Strategy
a. Product stewardship	<ul style="list-style-type: none"> <li>The Victorian Government needs to throw full support behind the Australian Government's <u>Priority Waste Streams</u> so that they become legislated product stewardship schemes ASAP.</li> </ul>
b. Container deposit schemes	<ul style="list-style-type: none"> <li>Implement CDS to align with a national approach</li> </ul>
c. Banning single-use plastics	<p>Single use plastic is a very broad definition of a spectrum of products and packaging. The excessive use of these materials needs to be managed including banning where appropriate, for example plastic bags, plastic cutlery and straws (except for therapeutic use). Additional options need to include the consideration of appropriate labelling for disposal (see ARL), education campaigns about recycling and the impacts of litter (including cigarette butts), and the development of container deposit legislation for Victoria. A considered but expeditious program of change needs to be developed by Victoria to resolve the over-reliance on single use plastics and its significant impact on the environment as a component of litter. This should be a consideration of priorities and impacts seeking alternatives and regulating where possible.</p>
d. Government procurement policies	<ul style="list-style-type: none"> <li>Mandated procurement including recycled content by local and state government departments</li> </ul>

5. Relevant reviews, inquiries and reports into the waste and recycling industry in other Australian jurisdictions and internationally:
- National Waste Policy 2018
  - National Waste Report 2018
  - Waste Account, Australia, Experimental Estimates, 2013