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Working globally for a toxic free future

Submission to the Victorian Government, Legislative Council Environment and Planning Committee – Inquiry into recycling and waste management 2019.

- 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;**

The responsibility for waste management in Victoria, like other states, resides primarily with Local governments. Therefore, it is critical that the State Victorian government supports its Local Governments to deliver safe and effective waste management to its residents, businesses and communities. Waste management is a basic and critical public interest service that society is heavily dependent upon. Representing the final stage of our materials production systems, waste and how we manage it reflects profound and long-term considerations for health and environmental protection first and foremost for workers and communities, but also for global ecological sustainability. We urge the Victorian government to take a pro-active and deeply considered approach to developing waste management policy. We demand that the principles of environmental justice, sustainability and a circular economy be at the heart of all waste management policy development. Globally, the western world is rapidly coming to grips with the consequences of its colonialist approach to resource extraction, materials production and waste disposal decisions. We therefore urge the Victorian government to embrace a true Zero Waste and a Circular Economy agenda that like the EU and US, recognises that linear waste management models perpetuate unsustainable raw materials extraction, production and consumption. The reliance on landfills and waste incineration has long been the backbone of this model where finite fossil fuels and raw materials (especially plastic) are manufactured into single use products and dumped back into our environment or other poorer countries or lost forever as pollution and toxic ash in waste to energy incinerators. The energy and resources used to create and support this system can never be replaced in our lifetimes or possibly ever. Therefore, waste management is really at the forefront of addressing these cross sector and multi-disciplinary aspects of our society through climate change threats, ocean marine pollution, food security and environmental protection and sustainability.

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1. whether the China National Sword policy was anticipated and responded to properly;

Australia has known as early as 2013 that China would act to protect workers, citizens and their environment from contaminated waste imports. This was declared in their policy – Operation Green Fence. At this time, it appears that Australia did not respond by ensuring all exports of plastic and paper wastes particularly, were able to meet these new standards. In response to increasing contamination levels and a lack of global response, in 2017 China declared its National Sword Policy to ban the importation of contaminated wastes for recycling. Still it appears that the Australia government did not act to support the Australian waste and recycling industry to improve their processes and comply with stricter importation standards. The exportation of wastes to the Asia Pacific region by Australia is unsustainable and unethical. Transboundary waste shipments have been exposed as causing gross environmental damage and the violation of human rights in those receiving countries, particularly in relation to e-waste and plastic. The Victorian government must uphold Australia’s commitments to all international treaties and conventions to which Australia is a signatory including the Basel and Stockholm Conventions. This includes the new amendments to the Basel Convention to restrict the transboundary shipments of plastic waste and the elimination of Persistent Organic Pollutant’s - a prime waste to energy incineration air emission and ash pollutant.

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3. identifying short and long-term solutions to the recycling and waste management system crisis, taking into account:

a. the need to avoid dangerous stockpiling and ensure recyclable waste is actually being recycle

The awful truth is that most plastic waste is not recyclable. Waste management definitions are notoriously manipulated by those industries with vested interests. Recycling has originally and always meant, turning a waste material back into the same product so as to avoid the need for raw materials extraction for that same new product. For example, turning a PET drink bottle back into a PET drink bottle. This is the true definition of recycling that supports a circular economy. Increasingly the term recycling is referred to as downcycling. Turning a PET bottle into a park bench, road base, toy or other consumer product. While on face value it may seem that this plastic is being used to replace raw materials extraction to make new products, but in reality the practice is flooding our materials production systems with waste plastic to expand the production of plastic based products, while doing nothing to reduce the need for raw materials extraction for that PET drink bottle and creating a whole new market for lower grade plastic products. These lower grade mixed plastic waste products are unlikely and often unable to be recycled again due to inherent toxicity in the materials. This in effect creates a linear process for waste plastics disposal outcomes primarily landfill and incineration both of which grossly pollute and harm our environment. The solution to this problem is not to downcycle more and more plastic waste. The only solution is to put a cap on the production of plastic and legislate for industry to redesign their plastics for safe recycling and circularity. In the interim Victoria could manage plastic waste more efficiently and safely by ensuring a greater focus is put on separate collection and more effective source separation technologies to create cleaner waste streams. Victoria needs to better regulate and monitor compliance of the waste management industry. Rogue operators cannot be allowed to risk human health and the environment through dangerous stockpiling and contaminating processes. Increased cleaning and separation need to start in the home, business, office and industry environments. Comingled recyclable collection systems and large- scale automated Material and Resource Recovery Facilities are failing to adequately clean and separate the waste stream for export and recycling outcomes. Victoria needs to meet the new standards for export, and this can only be achieved through better source separation and collection systems. For example, separate paper and cardboard collection should be standard across the entire municipal, industrial and commercial sectors. This needs to be expanded into public places and supported by government public education and support services. Indeed, the waste shipments returning to Australia from Indonesia are exactly because of the contamination of this waste stream which could have been easily resolved through better collection and source separation systems.

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b. the cleaning and sorting capabilities and the processing capabilities in Victoria and the potential to expand the local recycling industry

Large-scale automated resource recovery technologies are designed to generate a guaranteed amount of residual waste for disposal and contaminated recyclable waste stream. The Victorian government could improve the quality of recyclable wastes by

1. Providing more public, home and workplace place bins (or receptacles) for recyclable materials. Separate bins (or receptacles) and collection for a) paper and cardboard, b) tins and metals, c) plastic containers, d) soft plastics, e) compostable waste (food and green) and f) glass. 6 bins for separate collection would ensure these waste streams remain uncontaminated and retain their value for reuse, recycling or downcycling.
2. Supporting local small- scale community opportunities for waste separation and resource recovery. People living in units and apartments may find it more difficult to separate waste for recycling. Local community initiatives can significantly assist residents and local businesses (esp. cafes and restaurants), creating local economies and community connectedness, especially for compostable wastes. A great example is [Kooda](#).
3. Improving the performance and regulation of waste collection systems. Trucks collecting comingled recyclable wastes contribute to the contamination of the recyclable waste stream and loss of their resource value. Removing paper and cardboard from this collection system would be a simple and effective way to reduce contamination. Better education and support for residents and business to learn and understand the importance of waste separation is urgently needed and would provide great benefits of scale.
4. Improving the operation and regulation of resource recovery facilities is critical to improved waste management outcomes. Currently largescale resource recovery technologies do not adequately separate our waste streams. With improved separation and collection systems of the municipal, commercial and industrial waste streams, resource recovery operators can be better supported to deliver cleaner waste streams. Investing in dedicated manual sorting and separation prior to the automated systems, would greatly improve the process and provide much need employment for Victorians.
5. Connecting local community-based waste management services to local and regional government services, embeds a mutually supportive relationship in our communities that can enhance community awareness and education on waste and deliver cleaner recyclable waste streams. Supporting a more localised waste management model is an important part of any sustainable city model. As Melbourne is part of the global C40 model, Melbourne should take a lead role in pursuing zero waste and circular economy models that do not result in waste to energy incinerators or contaminated waste exports.
6. A focus on the higher order principals of the waste hierarchy will help to deliver cleaner waste streams that will assist in developing more recycling opportunities.

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c. how to better enable the use of recycled materials in local manufacturing;

Once cleaner recyclable waste streams are achieved, then there will be more confidence in the recycling and materials production sectors at a local and international level. The Victorian government should set a good example through their own procurement systems for recyclable content. There needs to be independent assessment at arms-length from the waste management industry, so as to ensure that new products do not become highways for contaminated waste stream disposal. For example, microplastic pollution is a serious global threat. Any new use of plastic waste must ensure that environmental releases are prevented. Plastic waste to roads, fuel and

chemicals all increase the release of plastics into the environment, either to air directly, or through the spread of micro and nano plastic particles into the environment.

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d. the existing business model and economic challenges facing the existing industry;

The waste management industry and government policies, have historically and continue to be, led by the waste disposal sector. This has fundamentally designed a waste management system and supporting government policy framework that leads to disposal outcomes. A lack of investment in the higher order waste hierarchy principles or sustainable zero waste models is a direct result of the waste disposal sectors dominance in government and policy settings. This needs to change if Victoria is to be able to develop a sustainable waste management system and meet Melbourne's commitment to the global C40 model. Low recycling rates, landfill, waste to energy incineration and other disposal outcomes are guaranteed when these sectors design the waste collection and resource recovery models that produce their feedstocks. The vertical and horizontally aligned fossil fuel and petrochemical/ plastics sectors with the waste to energy incineration industry is at the heart of the problem. Instead the Victorian government should look to circular economy and sustainability experts to inform waste management policy. For example, the removal of compostable waste from all waste streams is a relatively easy but major leap forward for sustainable waste management policy. Isolating this waste stream not only contributes to significant ghg reductions through the avoidance of landfill methane generation but also becomes a climate solution through the retune of Soil Organic Carbon to the biosphere and avoids the contamination of other materials thus preserving their resource value for future uses. The EU has recently legislated to require all compostable wastes to be removed from the waste stream for this very reason as well as setting policy recommendations to all member states to decommission old incinerators and not build new ones. This is the blueprint for their circular economy model. It would be irresponsible for the Victorian government to ignore the progressive work and lessons from the EU in pursuing a zero waste and circular economy model.

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e. the quantifiable benefits, including job creation and greenhouse gas emissions reduction, of pursuing elements of a circular economy in Victoria;

Currently Victoria's waste management model is linear by design. The well documented global benefits of zero waste and circular economy models are clear and known.

References

<https://zerowastecities.eu/>

<https://zerowasteurope.eu/case-studies/page/2/>

f. the existing Sustainability Fund and how it can be used to fund solutions to the waste crisis;

4. strategies to reduce waste generation and better manage all waste such as soft plastics, compostable paper and pulp, and commercial waste, including, but not limited to:

a. product stewardship; We support a product stewardship model for Australia

b. container deposit schemes; We support a container deposit scheme that delivers safe plastic waste recycling industries that does not include waste to energy incineration or fuel burning outcomes.

c. banning single-use plastics; We support single use plastic bans and they should include, bags, straw, balloons, microbeads, non- recyclable plastic packaging and products.

d. government procurement policies; We support government to procure recycled products that do not result in harm to the environment or workers. We do not support plastic roads, plastic to fuel burning, PEF burning in cement kilns or paper mills or residual waste burning in industrial combustion industries.

5. relevant reviews, inquiries and reports into the waste and recycling industry in other Australian jurisdictions and internationally;

The EU is currently a leader in zero waste and circular economy policy with a number of successful case studies demonstrating the success of their policies at a scale comparable to any Australian city or community. Victoria doesn't need to reinvent the wheel. It can act quickly to make the relatively cheap and yet significant changes in their waste management sector to deliver a vastly improved and more sustainable waste management system.

<https://zerowasteurope.eu/case-studies/page/2/>

7. any other related matters.

Yours sincerely,

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