

# Submission for Parliamentary Inquiry into Waste Management and Recycling

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Thank you for the opportunity to provide feedback for the Victorian Parliamentary Inquiry into Waste Management and Recycling. As a Victorian, waste educator in local government and volunteer with Zero Waste Victoria, I see the need for systemic change in the waste and recycling sectors. The Victorian Government has the capacity and responsibility to facilitate this change.

Please see below, my feedback and suggestions for each part of the Environment and Planning Committee's terms of reference:

**1. What is 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?**

It is the Victorian Government's responsibility to:

- **Legislate** to prohibit unnecessary sources of waste and ensure waste is managed effectively
- **Fund** research, market development and initiatives for the prevention and management of waste, as per the waste minimization hierarchy (avoid -> reduce -> reuse -> recycle)
- **Regulate** the waste and recycling industries to ensure they comply with relevant legislation and that waste is managed safely and responsibly
- **Facilitate demand** for recycled products by mandating Victorian and local government procurement of recycled products and targets
- **Engage** with industry, local governments, the community and other relevant stakeholders to understand the existing waste management and recycling problems and be part of the solution
- **Facilitate greater recycling (and recycling education) consistency** across Victoria in consultation with industry and local government
- **Educate** Victorians on avoiding, reducing, reusing, repairing, repurposing and correctly recycling – A Victorian-wide campaign should be developed, which local governments can help implement
- **Advocate** to the federal government for an effective national approach to minimising and better managing waste in Australia

**2. Was the China National Sword policy anticipated and responded to properly?**

China's National Sword policy should have been anticipated. In 2013, China signaled it wanted to clean up its imports of recycling by adopting its Operation Green Fence policy. This policy set a limit of 1.5% of allowable contamination for each bale of imported recyclables (including materials such as metal, plastics, textiles, rubber and recovered paper). David Newman, president of the

International Solid Waste Association (ISWA) commented at the time that "Operation Green Fence sends an alarming signal regarding the sustainability of an export-based recycling system" and "We must think twice about the costs and benefits of exporting recyclables to developing countries and identify the consequences along the value chain of a monopoly market player like China" ([Earley, 2013](#)).

On 18 July 2017, China announced to the World Health Organisation (WHO) that it would no longer accept certain types of solid waste (including plastic waste, unsorted waste paper and waste textile materials) from 31 December 2017. It indicated that these streams of waste with more than 0.5% contamination would no longer be accepted from 1 March 2018 ([Government of South Australia, n.d.](#)).

When China's National Sword Policy first commenced, Material Recovery Facilities (MRFs) around the world looked for other markets to sell their recycled material to for processing and recycling. Not surprisingly, this resulted in other markets being flooded with low grade, contaminated mixed recyclables. Exporting recycling to other countries, including those that lack the infrastructure and regulation to manage it safely, was never going to be a long term solution. Thailand, Malaysia and India have since announced that they too, will ban foreign waste imports ([Topsfield, 2019](#)). Australia didn't prepare for or deal with China's National Sword policy in a responsible or sustainable way.

There are ethical concerns about the conditions in which our recyclables are handled, processed and recycled overseas, including in regards to poor environmental management and pollution control, as well as unsafe working conditions.

Recycling can be a dirty business and we have been handballing this problem to other countries to deal with for a long time. We need systems in place to reduce the amount of waste that is generated so there is less need for recycling and waste disposal. We need to be responsible for our own recyclable waste by recycling it locally.

### **3. Identify 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 recycled**

In order to avoid dangerous stockpiling, the below reasons for the stockpiling need to be addressed:

- Reduced demand for and value of materials stockpiled
  - The cost of some recycled materials is comparable to that of the equivalent virgin materials
  - There is minimal buy-back of items made from recycled materials
  - Other countries are closing the door to our recyclable waste
  - The demand for recycled materials is market dependent and therefore changes over time
- Contamination
  - When glass breaks it is at risk of contaminating the paper stream and is difficult to filter out

- There are different recycling rules and recycling education messages delivered in different areas, making it difficult for consumers to know what they can and can't recycle and increasing contamination. This inconsistency is a result of:
  - o Small differences in what each MRF accepts and doesn't accept for recycling
  - o Some MRFs saying they will accept particular items they can't process for recycling in order to get a contract, even though they treat these items as contamination
  - o Some local Governments preferring to do things their own way as they think it is superior
  - o The [Australasian Recycling Label \(ARL\)](#) sometimes contradicting local recycling information
- Inadequate technology at MRFs to effectively filter out contamination
- Inadequate detection of the illegal collection and storage of hazardous waste, included in rented warehouse buildings

Whether an item actually gets recycled or not depends on if there's a market for it, its dollar value and the demand for the recycled material. Any market-based recycling system will have periods where there is limited demand for certain materials. The need to stockpile will reduce when the recyclable waste can be sold for profit.

To reduce stockpiling and ensure our recycling actually gets recycled, the following is recommended:

- Move away from a market-based system
- Reduce the amount of (recyclable) waste that is generated, i.e. so there is less recycled waste to manage
- Increase the demand for recycled materials by:
  - Legislating the mandatory procurement of recycled products and targets, across all levels of governments (see 4(d) below)
  - Taxing the importation and manufacture of products made from virgin materials
  - Introducing mandatory labeling for the percentage content of recycled material in products and packaging
- Improve the separation of recyclables collected by:
  - Introducing a Container Deposit Scheme (see 4(b) below)
  - Asking consumers to separate glass from the rest of their recyclables – Yarra City Council is about to start trialing this
  - Installing state of the art technology at MRFs to increase the effectiveness of the sorting of comingled recycling and the filtering out of contamination
- Reduce contamination by requiring each MRFs to:
  - Provide the same list of accepted items to each local council and contracted waste collection company using their facility, have this available on their website and ensure it is an accurate reflection of what is likely to be recycled
    - o Respond to local government, business and community queries about what can and can't go in recycling bins (will require funding)

This will ensure greater consistency in recycling communications. Information provided about what can and can't be recycled currently differs between councils that use the same MRF.

- Have a Victoria wide recycling education campaign which local governments can tap into to increase awareness about what can and can't be recycled and increase consistency in the messaging around this
- Develop a back-up plan for the temporary/ permanent closure of existing MRFs
- Increase funding to EPA Victoria to investigate possible cases of the illegal collection and storage of hazardous waste

**(b) The cleaning, sorting and processing capabilities in Victoria and the potential to expand the local recycling industry**

MRFs need funding to update their technology and systems for increased cleaning and sorting capacity.

One of the three major MRFs recently had a number of sites temporarily shut down due to unsafe stockpiling. All three major MRFs are struggling to find buyers for the recyclable waste they sort and bale. They are therefore unlikely to be able to increase the volumes of recyclable waste they accept.

The limited number of major MRF companies in Victoria has reduced competition. If one goes down there will be a duopoly on the market. We need more sorting/ processing facilities and companies in Victoria.

The recycling industry needs further development in Victoria.

**(c) How to better enable the use of recycled materials in local manufacturing**

To better enable the use of recycled materials in local manufacturing, the following is recommended:

- Fund the CSIRO to enable them to expand their [ASPIRE program](#) and allow businesses and Councils to join free of charge.
  - ASPIRE (Advisory System for Processing, Innovation & Resource Exchange) is an online marketplace which intelligently matches businesses with potential purchasers or recyclers of their waste by-products
- Subsidise local recycled materials
- Make the procurement of recycled materials and products mandatory at all levels of government
- Address the contamination of items collected for recycling more effectively

**(d) The existing business model and economic challenges facing the existing industry**

For reasons outlined in 3 (a) above, the market-based nature of our current system for recycling is not ideal. It will always be subject to market failure. At these times stockpiling or landfilling is likely.

These issues cannot be eliminated unless we move away from a market-based system. However the amount of stockpiled/ landfilled recyclable waste can be reduced by increasing the consistent demand for it.

In addition, the commercial nature of the recycling system means that MRFs don't work together or share information, but instead compete against each other. This needs to change.

**(e) The quantifiable benefits, including job creation and reduced greenhouse gas emissions, of pursuing elements of a circular economy in Victoria**

Pursuing a circular economy in Victoria makes a lot of sense and will result in job creation, as well as reduced greenhouse gas emissions. More jobs can be anticipated in the reuse, repair, repurposing and recycling of recovered waste (a resource), which will reduce the energy expenditure associated with the extraction, refinement, transportation and processing of raw materials into products ([Sustainability Victoria, 2019](#)).

In order to achieve a true circular economy we need to ensure our recycling doesn't involve downcycling items into products of lesser quality, functionality or value, wherever possible.

**(f) The existing Sustainability Fund and how it can be used to fund solutions to the waste crisis**

\$511 million was accrued in the Sustainability Fund as of 30 June 2018 ([Municipal Association of Victoria, n.d.](#)). The Sustainability Fund should be used to fund solutions to the current waste crisis including:

- Research into new technology and market development to
  - Increase the demand for recycled materials
  - Find new uses of recycled products
  - Better sort commingled recycling to reduce contamination
  - Develop effective microfiber capture technology for washing machines
- The development of a local recycling industry so that our recycling can be processed and recycled within Australia (rather than exported overseas)
- Initiatives that prevent and better manage waste
- A Victoria wide education campaign to support Victorians to avoid, reduce, reuse, repurpose, repair and correctly recycle
- Training programs for skill development in repair

The Sustainability Fund should not be used to fund waste to energy. Unfortunately waste-to-energy schemes require a set amount of waste on a continual basis to be viable, undermining efforts to avoid/ reduce/ reuse/ recycle waste.

**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**

Australia has a number of voluntary product stewardship schemes, however their effectiveness is limited by their voluntary nature. In addition, there is a long list of products with no product stewardship program, including for hazardous products such as paint, polystyrene and microfibers.

We need mandatory product stewardship for all products that generate waste. It makes sense to start with products that are most hazardous to people, the environment and/or wildlife.

**(b) Container deposit schemes**

Evidence suggests that container deposit schemes are effective in reducing beverage container litter. In addition, a Container Deposit Scheme would reduce the amount of glass in the comingled recycling stream, reducing contamination from broken glass. Beverage containers collected through the scheme would be considered cleaner and hence more valuable and easier to recycle, due to their separation from other types of recyclable waste.

There is a high level of support for a container deposit scheme in the community and amongst local councils. Victoria is the only state/territory in Australia without a Container Deposit Scheme in place or under development. Victoria needs a container deposit scheme.

**(c) Banning single-use plastics**

Single-use plastics are unfortunately very abundant. They are a large part of the consumer waste stream and problematic when they become litter. We need to phase them out of existence. However this is not enough. We also need to phase out other single-use plastics, including polystyrene, microbeads and microfibres. We need a strategy and better systems in place to enable this to happen without single-use plastics being replaced with other problematic single-use (disposable) items.

Paper alternatives to single-use plastics can be problematic. While paper is biodegradable, it is also associated with land clearing and habitat destruction, unless made from recycled paper. Single-use plastics should be replaced with a culture of reuse, not with other disposable products.

Congratulations must go to the Victorian Government for deciding to ban single-use plastic bags in Victoria. However there needs to be a strategy in place for ensuring that limited use thick plastic bags (like those distributed by department stores) don't become more abundant when the Victoria-wide ban on single-use plastic bags comes into effect.

The banning of single-use plastics should be done alongside the implementation of facilitatory systems and a multi-faceted strategy to achieve an overall reduction in waste greater reuse and more repair, repurposing and recycling.

#### **(d) Government procurement policies**

There is a need for mandatory procurement of recycled products and targets, across all levels of governments. Mandatory reporting against these targets should also be introduced, with the results made public for transparency. Local government performance in regards to the procurement of recycled materials and products should be included on the Victorian Government's [Know Your Council](#) website for easy comparison.

#### **5. Relevant reviews, inquiries and reports into the waste and recycling industry in other Australian jurisdictions and internationally**

Australia's National Waste Policy and the National Product Stewardship schemes are inadequate in their current form. The following is recommended:

- Strengthen Australia's National Waste Policy
- Set binding targets for waste reduction in Victoria and the whole of Australia
- Develop a comprehensive strategy for transitioning Victoria and the whole of Australia to a circular economy – This strategy should address commercial and industrial waste, construction and demolition waste, as well as municipal waste
- Expand the National Product Stewardship framework to include mandatory product stewardship for all products that generate waste

#### **6. Any other related matters**

I also urge the Victorian Government to:

- Introduce a Cigarette Butt Deposit Scheme
- Require all local governments to have a Food Organics Garden Organics (FOGO) collection to recycle food and garden waste into compost for farmers, keeping it out of landfill
- Support councils, the hospitality industry, education institutions and community groups to compost and better manage food waste
- Require all council, hospitality and educational institution facilities to have a recycling service in place
- Advocate to the Federal Government for
  - Strengthening the National Waste Policy
  - Binding targets for waste reduction
  - A comprehensive strategy for transitioning Australia to a circular economy
  - Mandatory product stewardship for all products that generate waste
  - A ban on the importation and manufacture of hard to recycle materials
  - A mandatory ban on the import, manufacture and supply of products containing microbeads, effective immediately
  - Phasing out all single-use (disposable) items containing plastic or polystyrene
  - Taxing the importation and sale of synthetic material and clothing
  - Subsidising local recycled materials
  - Giving consumers stronger legal foundations for taking action under the Australian Consumer Law when products break or are unable to be repaired

- Requiring Australian Packaging Covenant Organisation (APCO) to set a minimum recycling target of 100% for all packaging by 2020 and mandate improved enforcement of APCO
- Be guided by the precautionary principle by:
  - Taking preventive action when there is uncertainty
  - Shifting the burden of proof to the proponents of the activity
  - Exploring a range of alternatives to the possibly harmful activity
  - Increasing public participation in decision making

[\(Kriebel et al., 2001\)](#)