

From: James Cordwell [REDACTED]
Sent: Friday, 10 May 2019 12:39 PM
To: recyclinginquiry
Subject: Submission to the Inquiry of Recycling and Waste Management - AMCS
Attachments: Submission to Inquiry on Vic Recycling and Waste Management, AMCS.pdf

Dear Sir/Madam,

RE: Submission to the Victorian Inquiry into Recycling and Waste Management

The Australian Marine Conservation Society (AMCS) is the nation's peak marine conservation group. Thank you for the opportunity to make a submission to the Victorian Inquiry into Recycling and Waste Management.

Please see our attached submission, and feel free to contact me if we can provide any further information in relation to it.

Yours sincerely,

Jimmy



Jimmy Cordwell

Marine Parks & Ocean Plastic Pollution Campaigner

Australian Marine Conservation Society

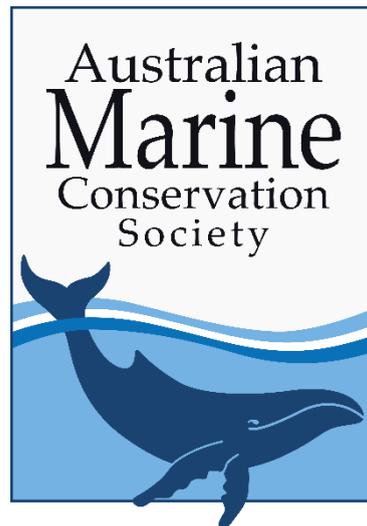
a: PO Box 5815 West End QLD 4101

w: www.marineconservation.org.au **e:** [REDACTED]



Help protect our ocean wildlife. Become a [Sea Guardian](#) today

To be guardians of Australia's extraordinary oceans, providing a voice for their marine life and inspiring others to take active stewardship.



Submission to the Victorian Inquiry into Recycling and Waste Management

Submission by the Australia Marine Conservation Society

May 2019



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May 10th, 2019

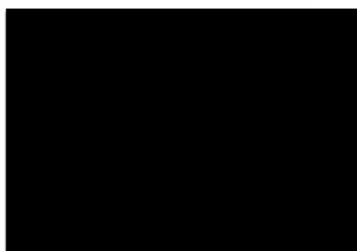
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Please contact me if we can provide any further information in relation to this submission.

Yours sincerely,



James Cordwell
Marine Campaigner, Australian Marine Conservation Society

Introduction to AMCS

The Australian Marine Conservation Society (AMCS) is a national environmental organisation working towards the conservation of Australia's coastal and marine environment and the marine biodiversity they support. Our mission is to be guardians of Australia's extraordinary oceans and a voice for their marine life, inspiring others to take active stewardship. AMCS is a not-for-profit charity listed on the Register of Environmental Organisations (REO).

AMCS has over 250,000 members and supporters who support our work financially, undertaking voluntary activities and through social media. Since forming in 1965, AMCS has had a long-standing involvement in improving the protection and management of Australia's marine environment.

Throughout our 50 year history we have worked through science based research, policy advocacy, on ground activity, community engagement and education to take effective action to protect Australia's marine and coastal environment. We work with and empower individuals, volunteers and communities to also be voices for marine conservation. We work with industry, stakeholder groups and indigenous organisations to identify solutions to unsustainable use of marine resources. We seek to work with and persuade government to make long term, precautionary and ecosystems-based decisions founded on the principles of ecologically sustainable development.

Submission to the Inquiry into Recycling and Waste Management

Australians want and deserve clean, healthy oceans full of life.

Yet plastic pollution is flowing into our oceans at an alarming rate, and is estimated there will be more plastic than fish in our oceans by 2050. Once plastic reaches the ocean, it entangles or is eaten by marine animals, leading to suffocation and starvation. Each day over 250 marine animals and over 2,700 seabirds choke to death on the plastic polluting our oceans.

Plastic has a long legacy, breaking down into smaller and smaller pieces that can last thousands of years, harming marine life and entering our food chains. And the longer we wait the worse it gets, but there is a simple solution.

We must ensure that plastic pollution will not find its way into our oceans, by stopping it at the source. If items polluting our oceans are no longer produced, they cannot bring harm to our oceans!

The Federal Senate Inquiry report titled: *"Never waste a crisis: the waste and recycling industry in Australia"* was released in June this year, and is a contemporary blueprint important to rebooting recycling and curving Australia's plastic pollution footprint.

The key changes the cross-party report recommends be implemented are: a single-use plastics ban by 2023, a national cash for containers scheme, and mandatory federal government targets.

Around the world nations are beginning to act. For example the UK has recently announced its intention to ban the sale of plastic straws, drink stirrers and plastic-stemmed cotton buds, and called on all other Commonwealth countries to join in the fight against plastic pollution.

Australians are taking notice. We know it's a big problem and we want all governments to be leaders in turning the tide on plastic pollution starting with a ban on single-use plastics by 2023.

The AMCS is a member of the Boomerang Alliance, a community coalition dedicated to addressing Australia's waste and recycling issues, particularly plastic wastes. The Boomerang Alliance has 48

allied organisations including major national, state and regional organisations concerned with litter, waste and plastic pollution.

To date the Boomerang Alliance have been instrumental in successful campaigns for a Container Deposit Scheme for bottles and cans in NT, NSW, QLD, ACT and WA. They strongly and successfully supported campaigns for a plastic bag ban in SA, NT, ACT, Tasmania, QLD and Victoria; and continue to lobby for NSW. They have previously been consulted on issues relating to eWaste, Waste-to-Energy and recently, we have been part of the Minister's Plastic Pollution Reference Group.

We have included the Boomerang Alliances submission below.

We produce too much waste and do too little recycling in Australia. China (and increasingly, other Asian countries) are implementing tighter restrictions on the import of co-mingled recycling but did not cause our recycling crisis – it merely brought it to the surface. We need to deal with our waste in our own country by implementing the principles of a circular economy.

We welcome the decision by the Victorian Parliament to hold this inquiry and present our detailed feedback below.

Container Deposit Scheme

We strongly advocate for a container deposit scheme (CDS) in Victoria. A CDS is the main answer to drink container recycling and litter by:

- Reducing the volume of kerbside recycling materials by ~20-25% reducing cost of collection and landfill levy; and diversion of container recyclables from the red (landfill) bin.
- The remaining materials in kerbside would be higher value as 80% of glass removed (beverage containers collected through CDS) and less contamination of paper and cardboard with glass fines in the yellow bin.
- Clean stream – higher value of recyclates through CDS: according to first year report of CDS in NSW, the value of PET bottles increased from \$110 per tonne to \$375 (350% increase).¹
- Job creation – 500 new jobs and no reported job losses in NSW¹; 600 new jobs in Qld.
- Consistent/ long-term secured stream of materials to recyclers creates safe climate for new or expanded reprocessing operators to enter the market.
- Established knock-on effect of improved at-home recycling behaviour due to CDS².
- Opportunity to establish uniform rules for what's recycled in households in all councils of Victoria – should be rolled out with large education campaign.
- National Litter Index (page 12)³: Two thirds of plastic litter volume in Victoria are beverage containers (CDS will reduce council cost for litter clean-up).
- 84% of Victorians support CDS⁴.
- Councils: many in favour in 2011 of Greens CDS bill, many more outspoken now, sending letters to the Minister calling for CDS (Brimbank, Port Phillip, Yarra City Council et al.)
- MAV as the statutory representative body of Victorian councils has been calling for a CDS for

¹ Boomerang Alliance, NSW RETURN AND EARN SCHEME - ONE YEAR ON, ONE BILLION CONTAINERS RECYCLED, https://www.boomerangalliance.org.au/nsw_cds_1yearreview

² Viscusi, W. K., Huber, J., & Bell, J. (2012). Alternative policies to increase recycling of plastic water bottles in the United States. *Review of Environmental Economics and Policy*, 6(2), 190-211.

³ National Litter Index, <http://kab.org.au/litter-research/national-litter-index/>

⁴ TEC/Boomerang Alliance, Omnipoll, June 2018, https://assets.nationbuilder.com/boomerangalliance/pages/3671/attachments/original/1533086664/Omnipoll_180621_Container_Deposit_Victoria.pdf?1533086664

years, recently renewed in their “Rescue Our Recycling” Action Plan⁵.

- Our campaign tour in 2018, the Big Bottle Tour attracted massive support from community and local councils⁶.
- Recent anecdote: At the Pako Festa 2019, Sustainability Geelong collected hundreds of signatures for CDS in only 3 hours – “People are fuming – they don’t want their recycling to be dumped!”

Investment into recycling industry and Government Procurement Policies

Despite one of the highest GDPs per capita, Australia lands in 17th place for the global recycling rank and our current rates are stagnant⁷. Councils say a “lack of funding, coupled with rock-bottom recycling prices, is hampering efforts to build better infrastructure and reinvigorate a dying market⁸. If Victoria is to increase its recycling rate and help the plastic waste crisis, two critical policies will need to be implemented: (1) funding and incentives for a recycling industry and (2) mandating a “Buy Recycled” program for product manufacturers.

Recycling has been shown to be more economically profitable than landfilling. A survey by Access Economics in 2009, estimated that 9.2 employees were directly employed in the recycling sector for every 10,000 tonnes of waste in Australia, compared to 2.8 directly employed with landfill⁹. In Victoria alone, an increase in recycling of 80% would create 2,310 jobs¹⁰. However, due to the lack of recycling infrastructure, recyclable material is currently being stockpiled, dumped, imported into Asian countries illegally, incinerated...just wasted!¹¹

Boomerang Alliance is calling for a substantial investment from the Sustainability Fund (we are calling for \$150 million for Australia)¹² to support a growing domestic recycling industry, including to improve infrastructure for the reprocessing of greater quantities of plastics. We note both major parties have announced federal election policies that would contribute to such a fund.

In addition, Victoria needs to build a market for the re-manufactured recycled material. Due to low oil and gas prices, virgin plastic is usually cheaper than its recycled counterpart. Victoria should aim for a 30% average recycled content in products by 2025 - but packaging manufacturers need an incentive to work towards this goal. The best way to create that demand is through a “Buy Recycled” scheme (mandatory minimum recycled content as part of government procurement policies) that makes the production of plastic from recycled material cheaper and more necessary than virgin plastics.

We also fully support the MAV’s call to “establish greater State oversight of the recycling industry to improve industry transparency and accountability in delivering an essential community service”.

⁵ Municipal Association of Victoria, “Rescue Our Recycling”, <https://www.mav.asn.au/news-resources/campaigns/rescue-our-recycling>

⁶ Boomerang Alliance, https://www.boomerangalliance.org.au/the_big_bottle_tour

⁷ Gray, Alex. “Germany Recycles More than Any Other Country.” World Economic Forum, 2017, www.weforum.org/agenda/2017/12/germany-recycles-more-than-any-other-country/

⁸ Towie, Narelle. “One Year on: Where Is Australia's Recycling Going Now?” The Guardian, Guardian News and Media, 28 Jan. 2019,

www.theguardian.com/environment/2019/jan/29/one-year-on-where-is-australias-recycling-going-now.

⁹ Access Economics 2009, Employment in waste management and recycling, July 2009

¹⁰ Environment Victoria Annual Report 2009-2010.” Environment Victoria , 2010, environmentvictoria.org.au/wp-content/uploads/2016/06/Environment-Victoria-Annual-Report-2009-2010.pdf

¹¹ Towie, Narelle. “One Year on: Where Is Australia's Recycling Going Now?” 2019

¹² Boomerang Alliance: Five Key Measures to Build a Sustainable Industry, https://www.boomerangalliance.org.au/5_key_measures_to_build_a_sustainable_industry

Product Stewardship

Australia's Product Stewardship Act (2011) can oblige companies to reduce waste and prevent harmful materials from ending up in the environment or landfill, by increasing recycling and recovery of valuable resources from products. While the legislation has good intentions, it clearly has not worked to reduce plastic waste and improve its recycling. Currently councils and households bear the cost, but it is now time for manufacturers to play a big role.

Out of the 907,401 tonnes of plastic packaging consumed in the year 2017-18, only around 32% was recycled overall, with only 14% recycled in Australia. With the expected increase in number of dwellings in Australia plastic consumption will only increase. In order to meet the 2025 targets of 70% of plastic packaging to be composted or recycled, we need the Victorian government to lobby the Commonwealth to drastically improve the Australian recycling law.

The National Waste Policy (2019) established by the federal and state governments is responsible for providing the national structure for waste management and resource recovery. But it needs specific legislation, funding and product plans to be effective. In the past only one product stewardship program (e-waste) has been mandatory, with the rest being voluntary.

Plastic packaging requires strong action. First, there should be a law requiring imported and domestic packaging to be composted or recycled. This will help overcome different types of plastics (polymers) being produced with disregard for the lack of existing infrastructure to recycle them. For example, multilayer plastics are being increasingly produced where flexible and rigid plastics with different chemical properties are assembled together to perform more complex functions to meet the demand for different types of food preservation and marketing of certain products. They are hard to recycle. Secondly, there must be penalties on companies that don't comply, so that alternative packaging is sought and implemented.

Manufacturers and retailers are the ones that design and produce the packaging and they should acknowledge their responsibility and role. A change to the national recycling law will ensure that overseas and domestic manufacturers meet the requirements to reuse, compost or recycle plastic packaging to meet modern standards.

In 1994, the EU introduced a Packaging Directive that set recycling targets for all packaged materials. This led to a reduction in the use of packaging materials that were not economically beneficial or technically possible to recycle and an increase in acceptable alternatives. Today a product manufactured in or for the EU market uses compostable packaging, whilst a product manufactured for Australia often uses polystyrene packaging. Many countries in Europe have banned the disposal of recyclables into landfills.

Australia must catch up. If Australia introduces a mandatory stewardship scheme for domestically-used packaging that meets the APCO target of having at least 70% of all packaging composted or recycled by 2025, then it will be the major first stage of implementing the circular economy, transferring more packaging to composting or recycling facilities than would otherwise end up in landfill. We are also calling for mandatory stewardship programs to keep batteries and solar panels out of landfill.

In conclusion, the two key measures required to strengthen the Product Stewardship Act are (1) design requirements on all packaging used in the Australian market to ensure packaging containing recycled content can be easily and economically composted or recycled and (2) that mandatory targets are set to ensure that the 70% by 2025 APCO targets are achieved, and earlier where possible.

Reduction in consumption of single-use plastics

We encourage the Victorian government to execute a widespread education campaign in conjunction with the introduction of the lightweight single-use plastic bags. This campaign should aim to drastically reduce the use of any single-use plastics. Equally, the government should lead by example and develop and implement plastic-wise policies (replacing all single-use plastics and using recycled content products as much as possible) for all events held, from internal meetings to the Formula One.

We draw the Committee's attention to our Plastic Free Places program that has successfully converted many food and drink business to plastic free practises¹³.

Waste to Energy (WTE)

The Boomerang Alliance has adopted the following policy in relation to energy from waste: "Any waste to energy process presents serious inherent risks to human health and the environment. There is no thermal process to capture the embodied energy value of mixed waste that will not create significant pollution and toxic releases. Australia's export of unprocessed waste to developing nations for supposed WTE operations is also unacceptable and continues to cause significant health and pollution events across South East Asia.

We oppose the creation of fuels and/or incineration or pyrolysis of: municipal solid waste, hazardous, medical and any other mixed waste stream.

The EPA recently approved a large WTE plant to be built by Australian Paper in the Latrobe Valley without a source-separating facility (meaning the plant will be unable to ensure only 'residual waste' is incinerated) and we note that the Victorian government provided a grant for this operation. We are very concerned about WTE plants starting to operate at a time when recycling is in crisis. The high demand for waste from WTE will cannibalise any fledging recycled materials recovery operations, provide an 'easy way out' for councils and put the emphasis away from waste reduction and recovery. WTE is NOT part of any circular economy, which the Victorian Government is claiming to aim for.

We are asking the Victorian Government to immediately halt any support (financial or otherwise) to waste-to-energy projects by incineration and instead put an increased effort into the above measures to help establish a domestic recycling industry.

Waste Avoidance

The planned introduction of a state-wide ban of single-use plastic bags needs to be led by a comprehensive public education campaign aimed to:

- Raise awareness of the impacts of plastic pollution;
- The immediate need for us, as a civilisation, to minimise the consumption of single-use plastics in all areas of our life;
- Provide examples for alternative products and methods;
- Outline what can be done at home and work and community;
- Showcase what changes will be implemented at government level (lead by example)

The state government must work closely with councils to support local waste minimisation efforts and initiatives.

¹³ https://www.boomerangalliance.org.au/plastic_free_places

Advocacy at National Level

We call on the Victorian government to strongly advocate the Commonwealth, via the environment ministers meetings, on the need for surveillance of the use and potentially action on thicker shopping bags, as well as mandatory national Product Stewardship schemes and a tax on virgin plastic products, to help fund a national domestic recycling industry.