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**From:** Inquiry into Recycling and Waste Management [REDACTED]  
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Inquiry Name: Inquiry into Recycling and Waste Management

Mr Peter Allan  
[REDACTED]

Director  
Sustainable Resource Use  
[REDACTED]

**SUBMISSION CONTENT:**

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## Parliamentary Inquiry into Recycling and Waste Management

### Sustainable Resource Use

#### Introduction

*Sustainable Resource Use is a Victorian based resource sustainability and recycling consultancy. Our Directors have been providing strategic advice to the federal and all state governments on recycling for twenty years. Alongside partner consultancies, we are currently retained to provide advice on kerbside recycling material markets through the Victorian Market Intelligence Project.*

*We are also working with major industry players from the packaging, retail and recycling sectors. We have been the primary source on recycling data for plastics and glass across Australia and have supported product stewardship developments for computers, televisions, tyres, oil, newspaper, packaging, batteries and lighting. Our submission represents our own perspective and is independent of all other government or industry views.*

#### Kerbside collections

Kerbside collections are the backbone of household recycling in Victoria. Each week over 90% of households undertake recycling at kerb. We should be rightly proud of this effort and of Victoria's pioneering role in the development of kerbside recycling in the 1980's and 90's. Volumes collected are increasing with population and household growth, but the recycling diversion rate has not increased in a number of years.

In part, this plateauing rate can be linked to reduced newspaper readership, glass losses and a switch in packaging formats from designated materials to soft plastics.

Since the introduction of kerbside recycling, we have expanded it through the addition of steel packaging and all rigid plastic packaging. This has been important in keeping the system relevant in diverting household waste. Audits conducted by SRU and many others show the two largest components of the remaining garbage stream are food organics and soft plastic packaging. The diversion of food organics through the existing garden organics recycling stream is now occurring across Victoria with strong waste reduction results. This change has, however been far too slow. The first food and garden organics collection in Nillumbik commenced over a decade ago and yet most Victorians still do not have access to this opportunity. This has been a massive failure of State and local government and has resulted in significant methane sourced emissions that should not have occurred.

***A high priority should be for all Victorians to have this kerbside service in the life of this parliament.***

In relation to soft plastics, this is the fastest growing packaging media and the commingled kerbside recycling system is increasingly failing if it does not include this material. Four Melbourne councils introduced soft plastics recycling utilising a method of presenting all soft plastics in a bag so that it can be sorted efficiently. This was enthusiastically welcomed by the communities in each of these municipalities with resident feedback higher than for any previous council initiative. This initiative needs to be maintained and extended. The Victorian government has joined with other jurisdictions and the Australian Packaging Covenant Association in setting a target of 70% plastic packaging recycling by 2025. As soft plastic

makes up a third of all plastics packaging and the current recycling rate is 21%, expansion of soft plastics recycling will need to be a key priority.

***It is recommended that the Victorian Government works with local government and APCO to facilitate all households having access to soft plastics in kerbside recycling in the life of this parliament.***

The level of contamination remains a challenge for kerbside systems. This is made up of three components; unrecoverable recyclables (mostly glass), garbage overflow and material added for recycling but not designated. The garbage in recycling often comes in large quantity from a small number of households. Some councils are considering withdraw of recycling in isolated cases to reduce serious contamination.

***It is recommended that the State Government partners with councils to reduce contamination in kerbside systems and conduct regular independent audits of sorting facilities to monitor and address system losses with MRF operators.***

Glass breakage, beyond a recoverable level is a key concern with losses during collection and sorting estimated between 30-55%. There is now active consideration and trialling of separate glass collections. Both Yarra and Warrnambool Councils are trialling glass separate kerbside collections. This is based on retention of more glass for recycling and on reducing the damage glass fragments are doing in paper recycling equipment and recycled paper. The separate collection may also be extended to multi-unit residential sites, an approach that is common in Europe.

***It is recommended that the Victorian Government facilitate the transition of kerbside collections to a glass separate configuration as soon as practical to underpin both glass and paper recycling viability.***

The steadily increasing amount of soft plastics and textiles in recycling reflects the desire of householders to be able to recycle these materials.

Kerbside recycling accounts for almost half a million tonnes of recycling and will play a continued important sustainability role if it evolves to meet the needs of end markets and the changing domestic waste profile.

### **Kerbside sorting**

The number of sorting facilities (MRF's) in Victoria has reduced and three main players hold almost total control of the sorting of kerbside material. The volumes into some of these MRF's are very high and throughput speeds can also be very high, a limiting factor on recovery of recyclables. The markets for mixed paper and mixed plastics are under stress and are limited here and into export. This can add to the difficulty of storing and processing recyclables in peak periods. Issues such as equipment breakdowns or fires on site also can add to MRF processing stress. The proportion of material entering MRF's that goes to landfill is estimated at 17%. Reducing this by slowing sorting lines or adding sorting staff would reduce losses but would have an increased cost.

At the present time, the recycling sorting sector has too much control over what gets recycled, and the current structure leaves local councils contracted collections vulnerable. Examples of that are the threatened suspension of sorting in 2018, the closure of SKM facilities recently and the refusal of MRF's to accept recyclables such as soft plastics, coffee cups and paper towel.

This contrasts with the system utilised in the North of Adelaide where the sorting facility is owned and controlled by a group of local councils. This enables them to more directly control the recycling outcomes and ensure collected product meets market needs and sites are managed to avoid stockpile build-up and potential hazard.

***It is recommended that the Victorian Government encourage and facilitate the establishment of council-controlled sorting in the coming round of kerbside recycling contracting.***

### **Kerbside recycling markets**

The kerbside system is under stress due to the current operations generating large volumes of mixed grade paper and plastics for which there are limited markets here and overseas. This situation will be improved by two measures, the introduction of glass separate collections and the improved design of packaging for recycling that is being undertaken by APCO and its industry members under the PREP system. The Victorian Government can play an important role in providing funding and other support for the rapid expansion of the plastics recycling sector and with the pre-sort of paper grades to meet market specification. The Government should also be in active dialogue with major Australian paper processors to ensure they are maximising recycled material into their operations. To meet the targets for plastics recycling in an export constrained environment, there is likely to be a need for a 400% increase in local plastic reprocessing capacity in the near future.

***It is recommended that, in partnership with the Federal Government, significant funding be provided to expansion of plastics reprocessing and paper sorting infrastructure.***

### **Other householder recycling**

While kerbside services form the primary role for dealing with end of life materials at household level, there are a range of products for which there are inadequate or non-existent pathways for convenient diversion for recycling. This includes most of the products in the following table:

<b>1. Batteries</b>
<b>2. Fluorescent tubes</b>
<b>3. Computers, keyboards, laptops</b>
<b>4. Printers, printer cartridges</b>
<b>5. Televisions</b>
<b>6. Paint</b>
<b>7. Gas cylinders</b>
<b>8. Auto batteries</b>
<b>9. Metal (whitegoods, pots, gutter, appliances)</b>
<b>10. Cables</b>
<b>11. CD players, DVD and VCR recorders</b>
<b>12. Rigid plastics (plant pots, buckets, crates)</b>
<b>13. Flexible plastics (bags, bubble &amp; cling wrap)</b>
<b>14. Polystyrene</b>
<b>15. Cardboard and paper</b>
<b>16. Telephones and mobile phones</b>
<b>17. Bicycles</b>
<b>18. Child car seats</b>
<b>19. Clothing, shoes, books</b>

<b>20. Mattresses</b>
<b>21. Sporting equipment</b>
<b>22. X-rays and film</b>
<b>23. Optical glasses</b>
<b>24. Tyres</b>
<b>25. Furniture</b>
<b>26. Soft furnishings/manchester</b>
<b>27. Smoke detectors</b>
<b>28. Cameras and photographic equipment</b>
<b>29. BBQ's</b>
<b>30. Audio equipment</b>

***It is recommended that the Victorian Government, with local government, charity organisation and industry partners, facilitate the establishment of a network of community-based recycling drop off sites to maximise the recovery of these products and facilitate the phase out of problematic hard waste collections.***

There are two specific wastes that have been appallingly neglected in Government programs. These are clothing and motor vehicles.

Over 400,000 tonnes of clothing reach end of life each year in Australia. Despite some excellent work by charities to facilitate reuse, less than 3% of clothing gets reused and even less gets recycled. This is dramatically below the systems being developed in Europe and the focus of the War on Waste program has raised community concerns and fashion industry motivation for a more sustainable outcome. There is currently no Victorian Government policy or program focus on clothing end of life. As with other parts of the recycling industry which are strong employment generators, the establishment of a national scale clothing recycling plant in Victoria represents an opportunity for economic activity and jobs that can be located in an area needing this benefit.

***It is recommended that the Victorian Government develop a response to the high rate of end of life clothing in partnership with charities and the fashion and retail sector as a priority.***

In relation to motor vehicles our efforts in Victoria are confined to metals recovery and ten of thousands of tonnes of car shredding residue (plastics, glass, rubber, textiles), are sent to landfill. This is in contrast to the Netherlands which operates a system achieving over 97% recycling of vehicle material. It also provides a crime reduction benefit through better vehicle tracking at end of life leading to reduced dumping and illegal exports.

***It is recommended that the Victorian Government undertake a review of motor vehicle end of life systems with Victorian Police and waste agencies with a view to increasing control of material recovery outcomes.***

### **Commercial recycling**

While commercial and industrial waste reduction results in two-thirds of waste being diverted, there are major gaps in waste reduction activity. As a result, durable plastics have a recycling rate less than 10% and over 100,000 tonnes of highly recyclable cardboard currently goes to landfill. In order to ensure a more comprehensive effort across the commercial sector, the Victorian Government should introduce a requirement for all inert waste to be pre-sorted before going to landfill or alternative waste treatment. This could take the form of separation at waste generator sites or the establishment of sorting lines at landfills or waste collection operator sites. The Victorian Government should also support

local government in providing recycling services to small to medium enterprises who often have difficulty in accessing cost efficient recycling options.

***That the Victorian Government introduce regulations requiring inert waste to be sorted for recycling at either waste generator sites or through licenced subsequent sorting sites.***

## Conclusion

While Victoria has traditionally been a national, and often international leader, in waste reduction and recycling, this position has diminished in recent years. The retention of a substantial proportion of funds raised from landfill levies has left the State with recycling research, collection systems and reprocessing infrastructure inadequate for meeting international benchmarks for a circular economy transition. The plateauing of recycling rates and the ever-increasing waste disposal in Victoria cannot be allowed to continue with a business as usual approach. The current policy focus on developing a circular economy approach is most welcome.

The establishment of realistic, comprehensive but ambitious targets for all aspects of resource sustainability need to be set. The achievement of these need to be underpinned with a regulatory and funding framework that is more aligned with community expectations.

This will include a more closely monitored and regulated resource recovery sector that benefits good operators and deals with non-compliant operators that have undermined this sector.

***It is recommended that Victorian Government agencies be instructed and funded to deliver better recovery outcomes and return Victoria to a leadership role.***

## Summary of recommendations

1. ***A high priority should be for all Victorians to have this kerbside service in the life of this parliament.***
2. ***It is recommended that the Victorian Government works with local government and APCO to facilitate all households having access to soft plastics in kerbside recycling in the life of this parliament.***
3. ***It is recommended that the State Government partners with councils to reduce contamination in kerbside systems and conduct regular independent audits of sorting facilities to monitor and address system losses with MRF operators.***
4. ***It is recommended that the Victorian Government facilitate the transition of kerbside collections to a glass separate configuration as soon as practical to underpin both glass and paper recycling viability.***
5. ***It is recommended that the Victorian Government encourage and facilitate the establishment of council-controlled sorting in the coming round of kerbside recycling contracting.***
6. ***It is recommended that, in partnership with the Federal Government, significant funding be provided to expansion of plastics reprocessing and paper sorting infrastructure.***
7. ***It is recommended that the Victorian Government, with local government, charity organisation and industry partners, facilitate the establishment of a network of community-based recycling drop off sites to maximise the recovery***

***of these products and facilitate the phase out of problematic hard waste collections.***

- 8. It is recommended that the Victorian Government develop a response to the high rate of end of life clothing in partnership with charities and the fashion and retail sector as a priority.***
- 9. It is recommended that the Victorian Government undertake a review of motor vehicle end of life systems with Victorian Police and waste agencies with a view to increasing control of material recovery outcomes.***
- 10. That the Victorian Government introduce regulations requiring inert waste to be sorted for recycling at either waste generator sites or through licenced subsequent sorting sites.***
- 11. It is recommended that Victorian Government agencies be instructed and funded to deliver better recovery outcomes and return Victoria to a leadership role.***