

DAREBIN CITY COUNCIL'S SUBMISSION TO THE VICTORIAN PARLIAMENT ENVIRONMENT AND PLANNING COMMITTEE'S INQUIRY INTO RECYCLING AND WASTE MANAGEMENT.

May 2019

Darebin City Council is pleased to make this submission to the Victorian Parliament Environment and Planning Committee's inquiry into recycling and waste management.

Darebin City Council has actively advocated on recycling and waste management issues for many years. We have written to successive State Ministers and Premiers and the Federal Government on key issues. We have worked with the Metropolitan Waste and Resource Recovery Group and other bodies to advance issues. We have worked closely with the Municipal Association of Victoria since the impact of the current recycling crisis was first felt in Victoria. We have spoken out in the media and on television - all with the aim to have improved recycling and waste management outcomes for our community. We continue this advocacy today.

Darebin Council Gives Strong Support to the Submission of the Municipal Association of Victoria (MAV) and their responses to the Terms of Reference.

The MAV's primary role is to lead advocacy on behalf of local governments to state and federal governments; to provide guidance and support to councils; and to facilitate information-sharing between councils. The MAV has developed a response to the Victorian Parliament Environment and Planning Committee's Inquiry into Recycling and Waste Management on behalf of Victorian Councils. Darebin City Council has had significant input to the submission from MAV and ask that their submission be considered when reading our comments.

In addition to the MAVs submission, Darebin City Council would like to highlight the following in line with the Terms of Reference.

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

We support the comments of the MAV on this point and would like to add the following:

Increased leadership is needed from the Victorian Government in relation to waste greenhouse emissions.

A number of Victorian and global Councils have now declared a climate emergency. Any response to the current crisis in Victoria's recycling and waste management system, must give significant attention to the potential greenhouse emissions and opportunities for innovative and urgent solutions to minimise emissions from waste and recycling management. Climate impact planning and emissions factors and related issues should be prioritised when seeking solutions for Victoria's recycling and waste crisis.

It is our opinion that the Victorian Government should take a more active leadership stance in relation to waste greenhouse emissions, waste greenhouse emissions avoidance and potential drawdown/sequestration outcomes. These must not be considered as after thoughts. They must be inherent components of planning and Strategy and market development. A solution that does not consider the climate emergency, does not provide a 'coherent, efficient or environmentally responsible approach'.

We believe that to do this, is a core responsibility of the Victorian government.

The Victorian recycling industry is not robust and is in crisis. This needs urgent state intervention.

There are three dominant MRF operators in the Victorian recycling industry. This small number of players results in limited space for errors, close down periods, accidents or incidents. If one of these operators closes down, the Victorian community is affected significantly, as evidenced by the recent SKM closure by the EPA.

While this remains the case, Victoria will not have a 'coherent, efficient and environmentally responsible approach to solid waste management across the state'. New and creative mechanisms, instruments and levers must be investigated to address this.

The Victorian government must act on the lessons from the recent SKM closure and related Victorian recycling crisis. This should include sourcing recycling storage options and assisting local government with costs.

The recent closure of SKM by the EPA resulted in turmoil in Victorian local government and the Victorian community. Significant amounts of valuable recyclable resources were sent to landfill. Little support was seen from the Victorian Government – on the contrary – finger pointing at the contracts of local government was heard from them. This was highly disappointing and showed poor leadership from the state. Local government were calling for assistance during this time, which was largely unheeded.

In line with this, Darebin City Council believes that the Victorian Government should immediately take steps to establish a storage facility for recycling in order to avert it going to landfill should a similar closure arise. We further believe that the State Government should provide financial support to local governments in the event that SKM is unable to meet its contractual obligations to financially compensate local governments for the cost of directing recycling to landfill. In the absence of adequate options such as this, other financial support for local government should be urgently provided by the state to address such times of crisis.

Please see other comments on the MAV submission in response to this TOR.

Terms Of Reference 2 Whether the China National Sword Policy was anticipated and responded to properly.

We support the comments of the MAV on this point and would like to add the following:

The Victorian government should create a Taskforce with Local Government to develop a new Recycling Industry Plan.

There is no evidence available to local government to indicate that the Victorian government took any steps to prepare for the National Sword policy's introduction. When the policy began to seriously impact on the Victorian recycling industry in 2018 - with the fallout and costs affecting local government - the Victorian government's response was rushed and reactive, not planned nor considered.

To specifically answer your question, an adequate or 'proper' response that was appropriately anticipated would have incorporated careful analysis, planning, stakeholder engagement, community education, market and economic analysis, initial investigations and scenario response planning etc. from the State Government. This would have occurred in a timely manner, well in advance of the crisis. It would have included key industry stakeholders, market developers, research and development specialists, economists, local government and a range of others to develop robust solutions before the crisis unfolded. We did not see this occur in any way, shape or form.

The response from the Victorian government after the initial 'rush' has been slow. The Recycling Industry Strategic Plan has resulted in little change and there is no indication of any urgency in approach from the Victorian Government.

Darebin City Council believe the Victorian Government must create a new Taskforce *with* local government representation as a first step to developing and implementing a new Victorian Government Recycling Industry Policy. We also look for investment of the landfill levy into recycling processing and education.

Terms Of Reference 3

Identifying short and long-term solutions to the recycling and waste management system crisis

Darebin City Council gives strong support to the MAV's response to this question agreeing that the Victorian Government should take key actions to:

- Invest in recycling infrastructure
- Fund and support market development
- Introduce a container deposit scheme
- Bolster community education
- Strengthen industry oversight/regulation

We support other comments of the MAV on this point and would like to add the following:

The Waste Hierarchy is a key approach that must underpin solutions.

Darebin City Council believes that the waste hierarchy must be used as the underpinning approach to any solutions. Waste avoidance and minimisation is a key starting point for this work, through to all stages of the life cycle from design to disposal. In the face of the climate emergency, communities must understand the significant greenhouse impacts their consumption decisions have at all elements of the life-cycle. Significant funding is required for this to occur appropriately and can be sourced from the landfill levy reserve.

The Victorian Government must help ensure that recycling materials are actually being recycled.

Significant recent discussion in local government has centred on whether MRF operators are sending recyclable materials to be recycled or not as there is no clear understanding of this. The State must ensure increased transparency and accountability from providers for this. At present, the State is pressuring local government to develop transparency in their contract documents with processors, which local government is seeking to do, however the ability of local government to do so is limited. State legislation and regulation can provide a cohesive approach and can strengthen compliance and outcomes on this point.

The Victorian Government must give increased market development assistance to support a robust domestic recycling market.

However, whilst transparency is one approach to 'ensure recyclable waste is actually being recycle[d]', more than this is needed. Low global market prices and difficulty in sourcing appropriate markets are believed to have led to increased stockpiling by recycling providers. Providers can obviously not afford to ignore these impacts – or businesses will fold. Increased market development assistance and planning for a robust domestic market by the State government as discussed throughout this submission remains critical to expand the local recycling industry.

Expansion of the local recycling industry must also consider more than just the existing players and their abilities to be larger players/take more recycling. It must consider more players, a more robust market and the development of a domestic recycling industry where we actually recycle and reuse the materials locally. Not one that is reliant on the global market in the way that it is at present.

The Victorian Government's Circular Economy Policy and Action Plan development needs prioritisation, increased rigour and should engage stakeholders meaningfully and early

There are many facets to creating a robust market and the development of the Victorian Government's Circular Economy Strategy should be hastened to address this issue more urgently. However, from what Darebin City Council understands of the proposed content for this Strategy, more rigour and focus on creating a robust domestic recycling economy will be needed over and above what is currently planned.

The involvement of local government in the development of this Strategy to date has been non-existent, other than one presentation to Technical Advice Reference Group members of the Metropolitan Waste and Resource Recovery Group. The engagement plan outlined at this meeting provided little reassurance that meaningful or early engagement would occur and that decisions would largely be made by the Department. Darebin City Council believes that the Victorian Government needs to reconsider its approach to engagement to enable more meaningful input from stakeholders to help shape the document.

We suggest the Victorian Government also work with other States and Territories and the Australian Government.

While we understand that the Victorian Government may not be able develop a robust recycling economy and market in isolation, we have yet to see signals from the State that they intend to push this agenda to create real and meaningful change more broadly. While we believe that the Victorian government must work to secure Victoria's recycling outcomes independently if necessary, we suggest that working with other states and territories and the Australian government for a cohesive national response, is likely to provide a more comprehensive solution.

Greenhouse emissions/ Circular Economy are critical to consider in the development of a robust recycling industry.

Over 500 international councils have now declared a climate emergency. This began with Darebin City Council as the first council in the world to declare a climate emergency. A continually growing number of Victorian and Australian councils have since made this declaration, with other councils committing to take action and show leadership to combat climate change. This commitment is driving new and significant investment into greenhouse emissions reduction actions by many Victorian councils.

The state government has also committed to reducing Victoria's greenhouse emissions and continues to make investment into related programs and actions. With this level of concern and existing and ongoing commitment

across Victorian state and local governments, it is a 'no brainer' that greenhouse emissions must be a priority consideration.

As discussed earlier, to have a robust local recycling industry the creation of a circular economy approach is strongly supported. This must incorporate potential greenhouse emissions and opportunities for innovative solutions as upfront considerations in a circular economy approach. Greenhouse emissions drawdown/sequestration, avoidance and minimisation options must be inherent components of planning and Strategy and should be embedded at the early stages of scoping, modelling and business planning.

Terms Of Reference 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 product stewardship, container deposit schemes, banning single-use plastics and government procurement policies

We support the comments of the MAV on this point, particularly in relation to product stewardship and container deposit schemes and would like to add the following:

The Victorian Government must implement the single-use plastic bag ban, consider packaging, microbeads and other single-use plastic items. It should also engage with stakeholders including local government to finalise its *Plastic Pollution Prevention Plan*.

Darebin City Council is leading other Metropolitan Melbourne Councils on single-use plastic elimination. Council has passed an elimination of single-use plastic resolution in June 2017 and has been working to eliminate single-use plastics from its operations, venues and events since that time. Many other Councils have followed this initiative and are now doing, or are poised to do likewise.

Single-use plastic recyclable items make up a significant component of the recycling stream – both as recyclable items or as soft plastic contamination. Significant reductions in litter and recyclable materials could be seen if single-use plastics were banned across Victoria.

We believe the state government must finalise its *Plastic Pollution Prevention Plan* and work closely with local government and other stakeholders in its creation. We further believe that the ban on single-use plastic bags (currently scheduled for implementation by November) should be prioritised. Alongside this, the Victorian Government must also address packaging, microbeads and other single-use plastic items urgently.

The Victorian Government should use legislative instruments as part of the strategic approach to reduce and better manage waste generation.

As discussed earlier, waste avoidance and use of the waste hierarchy are critical approaches that must be incorporated into strategies and planning. While a suite of approaches and tools are needed and appropriate government procurement policies have an important role to play, legislative instruments carry more weight and should be considered by the Victorian government. We believe actions to include are responses such as banning the import and production of hard-to-recycle materials, setting targets and introducing regulations and/or legislation to phase out the use of virgin materials for packaging and other products where possible and replace

with recycled materials and in the interim setting minimum recycled content procurement targets and also delivering related community education campaigns.

The Victorian Government must deliver statewide waste education through mainstream channels that have clear focus on the waste hierarchy and climate/greenhouse emissions from waste choices. Education must also focus on avoidance and be well funded to result in meaningful outcomes.

As a result of the “War on Waste” series, Darebin and other councils experienced increased community vigilance, action and advocacy on waste and recycling issues. If one tv series can do this, a concerted campaign from the state can do significantly more.

In other sectors the Victorian government has done this well. An example of a highly successful state-based education campaign is the ‘*Every Drop Counts*’ campaign. This resulted in significant awareness, understanding, behaviour change and action around water use in the Victorian community. The campaign was coupled with a suite of legislative instruments and programs to support its success. Waste and recycling issues and the related greenhouse impacts require equal attention and focus.

- It is our view that education must be focussed on all elements of the waste hierarchy and the climate impacts/greenhouse emissions of waste.
- Consideration of the waste hierarchy is supported by the *Environment Protection Act 1970*. Avoidance is a key element of waste reduction and education on over consumption, waste minimisation and wasteful purchasing and packaging are significant issues.
- Education on these issues should also highlight the greenhouse emissions involved at all stages of product creation, to waste generation, to disposal/recycling.
- To date, the Victorian government has not addressed waste avoidance education particularly well and largely focuses on recycling and disposal ‘fixes’. We believe this is a shortcoming of the current approach of the Victorian government. While projects like SV’s ‘*Love Food, Hate Waste*’ campaign addresses one element of waste - food waste - improved focus and outcomes are needed across the whole waste spectrum and hierarchy and the related greenhouse impacts in order for a coherent, efficient and environmentally responsible approach to be maintained.
- Significant funding must be channelled into state-wide waste and recycling education to support this. The Victorian government retains \$511 million unspent Landfill Levy at 30 June 2018. The waste and recycling industry and our community need this Levy to be spent urgently.

Darebin City Council thanks you for the invitation to make a submission to this Parliamentary Inquiry. We are hopeful that the outcomes will result in meaningful change. We would be happy to provide further information should it be required.

Sue Phillips
Coordinator Water and Waste Strategy
Darebin City Council
[REDACTED]