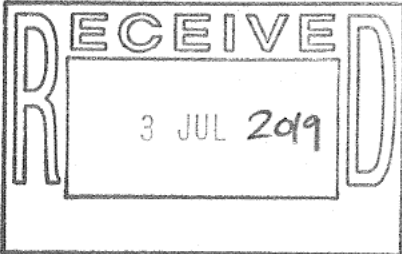




**Frankston City Council**

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Environment and Planning Committee  
Parliamentary Inquiry into Waste Management and Recycling  
Parliament House, Spring Street  
East Melbourne VIC 3022

24 June 2019

Dear Sir/Madam

**SUBMISSION FOR PARLIAMENTARY INQUIRY INTO WASTE MANAGEMENT AND RECYCLING**

Frankston City Council thanks you for the opportunity to provide a submission for the Victorian Government’s Parliamentary Inquiry into Waste Management and Recycling.

The recent challenges faced by the recycling sector have highlighted the need for transformational change to our waste and resource recovery system. We need to transition to a circular economy.

Council is a member of the Municipal Association of Victoria (MAV) and supports the points outlined in the MAV submission for this inquiry. Council’s submission reinforces these points and its own position regarding a number of relevant initiatives.

**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?**

Council considers the following to be core responsibilities of the Victorian Government:

- Environmental regulation

- Community education, with a view to improving consistency between different areas throughout Victoria
- Infrastructure planning and investment
- Market development
- Advocacy to the federal government
- Industry / essential service regulation
- Policy leadership
- Funding support to help improve the capabilities and resilience of the recycling sector
- Procurement of products made from recycled content (a responsibility of all levels of Government)

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

While local councils are responsible for providing household waste and recycling collection services, the scale and complexity of the recycling industry requires greater leadership and direction from federal and state governments. It is the federal and state governments that have the mechanisms to reform and strengthen our waste and resource recovery systems. The vulnerability of the recycling industry and resulting recycling crisis from 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.).

Despite the warning signs, there has been very little government action taken to prepare for or respond to the impacts of China’s National Sword policy.

**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**

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. The market-based nature of our recycling system means that there are periods where there is limited demand for certain materials. This can lead to dangerous levels of stockpiling and prevent some recyclable waste from being recycled.

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

In order to expand the local recycling industry, the following should be considered:

- Investment in processing and recycling infrastructure
- Funding and support for market development
- Procurement of products made from recycled materials, at all three tiers of government
- A container deposit scheme
- A consistent state-wide community education campaign
- Proactive consideration of the movement of waste materials in the long-term, including better tracking of waste from generators, as well as its use and disposal
- Mandatory product stewardship
- Improved regulation and/or other mechanisms to reduce the dependence and production of non-recyclable products and where possible, the manufacture of products made from virgin materials
- A stronger National Waste Policy
- Exploration of changes to how recyclable waste is collected

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

The following may help enable greater use of recycled materials in local manufacturing:

- Funding the CSIRO to enable them to expand their ASPIRE program and allow businesses and local 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
- Providing incentives to purchase local recycled materials and to reduce the dependence and sale on virgin/raw materials
- Regulating or introducing other mechanisms to reduce the production and importation of non-recyclable and hard-to-recycle materials

- Introducing mandatory product stewardship for all products that create waste
- Addressing the contamination of items collected for recycling more effectively
- Increasing the demand for products made from recycled materials, such as by:
  - Leading the way by making a commitment to purchasing products and materials made from recycled content where fit-for-purpose, whilst encouraging other levels of government to do the same
  - Introducing mandatory labelling to indicate the percentage of products and packaging made from recycled materials (i.e. so it's easier for consumers to buy recycled)

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

There are a number of business model and economic challenges faced by the recycling industry:

- The market-based nature of the industry means that the demand for recycled materials varies over time
  - At times of market failure, recyclable materials are subject to stockpiling or landfilling
- Material Recovery Facilities (MRFs) compete against each other rather than work together and share information
- There are only three major MRF operators in Victoria
  - This is a particular issue when one MRF closes
- Accepted items at MRFs are contract dependent and don't always reflect what can be processed and recycled
  - This adds to the inconsistency of recycling communications between local councils

These vulnerabilities can partially be addressed by reducing recycling contamination and increasing the demand for recycled products.

**(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. It would result in job creation, including in relation to the reuse, repair, repurposing and recycling of recovered waste (a resource), which will reduce the greenhouse gas emissions 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**

The Sustainability Fund comes from monies raised through the Municipal and Industrial Landfill Levy and is payable on each tonne of material sent to landfill. It has been largely stockpiled by the Victorian Government and left to accrue, with \$511 million accrued in the Sustainability Fund as of 30 June 2018 (Municipal Association of Victoria, n.d.). However these funds are essential to stimulate solutions to the waste crisis. Council urges the Victorian Government to use the Sustainability Fund to fund initiatives that reduce the generation of waste and support resource recovery in Victoria including:

- Research into new technology and market development to:
  - Increase the demand for recycled materials
  - Find new uses of recycled products
  - Better sort comingled recycling to reduce contamination
  - Develop effective microfibre 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 introduction and implementation of a Container Deposit Scheme
- Support for council food waste collection services, as recommended in the Victorian Auditor-General Office's Recovering and Reprocessing Resources from Waste report (2019)

In addition, Council recognises the importance of creating a demand for recycled materials and is looking to incorporate recycled content in procurement specifications.

**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**

Our current waste and resource recovery system provides little incentive for designers, manufacturers, importers, distributors and consumers of products to take responsibility for the environmental impacts of products throughout their lifecycle, from design to disposal.

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

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

**(b) Container deposit schemes**

At Council's Ordinary Meeting on 23 April 2019 (OM5), Council resolved to write to the Minister for the Environment, the Hon. Lily D'Ambrosio MP, seeking an urgent update on what efforts have been undertaken by the Victorian State Government to have legislation introduced to mandate a Container Deposit Scheme (CDS) within Victoria.

This follows Council's Ordinary Meeting on 4 September 2017 (OM306), where Council committed to advocating to the Victorian Government for a Victoria-wide CDS.

CDSs in Australia and around the world reduce beverage container litter, ensure that the beverage supplier industry takes greater responsibility for its packaging and rewards individuals, community groups, sporting clubs and charities for picking up littered beverage containers.

There is now a CDS in operation or planned in every state and territory of Australia except Victoria.

A CDS would bring clear benefits to Victoria in regards to minimising litter and its impacts on communities and the environment.

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

At Council's Ordinary Meeting on 1 May 2017 (OM300), Council resolved to write to Frankston Labour MP Paul Edbrooke, Environment Minister Lily D'Ambrosio and Victorian Premier Daniel Andrews MP to lobby the Andrews Labour Government to ban single-use plastic bags in Victoria.

Council supports the Victorian Government's decision to ban lightweight (single-use) plastic shopping bags in Victoria from November 2019. However, there has been few communications about the ban and little promotion of the 'Vic Bag Ban' website, which contains information and resources to help retailers and consumers prepare for it. This website does not appear in searches when you search online for 'plastic bag ban' or 'Vic Bag Ban'. There is therefore a risk that retailers and the general community won't be aware of the ban and what it involves, which would; a) compromise compliance with the ban, and b)

result in retailers wasting money on purchasing bags that will not be permitted once the ban is introduced.

At Council's Ordinary Meeting on 29 January 2018, Council resolved to support also banning thick plastic shopping bags and endorsed a submission to the Victorian Government's Reducing Plastic Pollution outlining this position.

It is also important to reduce the use of other low value, difficult to recycle single-use plastics, to reduce their litter impact and waste to landfill.

Any ban on single-use plastics should be accompanied by facilitatory systems and a multi-faceted strategy to achieve an overall reduction in waste, greater reuse and more repair, repurposing and recycling. Replacing single-use plastics with other problematic single-use (disposable) items should be avoided.

**(d) Government procurement policies**

There is a need for increasing the purchase of recycled products and materials across all levels of governments. All levels of government should be actively working towards reviewing and specifying recycled content commitments in their procurement policies.

Publication of the local, state and federal government procurement of recycled materials and products could help transparency and raise awareness about the potential applications for recycled products.

Regulatory specifications and requirements must enable the use of recycled content where appropriate.

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

Consideration of the following is recommended:

- Application of the environment protection principles to EPA's approvals process
- National Waste Policy 2018
- Product Stewardship Act 2011
- Environmental Protection Act 2017

A comprehensive strategy for transitioning Victoria to a circular economy is worth considering. This should address commercial, industrial, construction, demolition and municipal waste, as well as expansion of the current National Product Stewardship framework.

**6. Any other related matters**

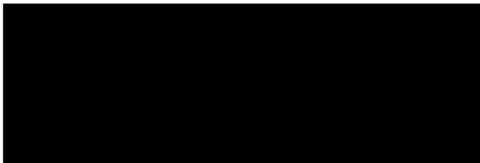
Council urges the Victorian Government to be guided by the precautionary principle by:

- 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

Consideration should also be given to:

- Binding targets for waste reduction
- Giving consumers stronger legal foundations for taking action under the Australian Consumer Law when products fail within an unacceptable timeframe or are unable to be repaired

Yours faithfully



**Dennis Hovenden**  
**Chief Executive Officer**