

# Waste Policy Review



## Have your say

Thank you for your interest in providing feedback on waste and waste management in Victoria.

The Waste Policy Review will examine the strategic, legislative, institutional and investment settings that influence the nature and performance of waste management.

Your feedback will help us draft a new solid waste policy that will address Victoria's long term challenges in waste and take advantage of future opportunities and emerging technologies in resource recovery and waste management.

If you do not already have a copy of the Waste Policy Review discussion paper, you can obtain one from the DSE website at [www.dse.vic.gov.au/waste](http://www.dse.vic.gov.au/waste). To request a hard copy contact [wastepolicy@dse.vic.gov.au](mailto:wastepolicy@dse.vic.gov.au) or call the DSE Customer Service Centre on 136 186.

## Feedback guidelines

Your feedback should clearly specify the question/s you wish to address.

Ideally, and where possible, your feedback should include supporting information, evidence and data. This will help develop a new solid waste policy that is informed by a strong evidence base, reflecting the experience of government, industry and the Victorian community.

Written submissions should ideally be kept to no more than 20 pages using this template.

**Submissions are due by: Thursday 3 May 2012**

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**Please write your feedback on the following pages and specify which question(s) you are addressing.**

## **Waste management in Victoria**

1. What is causing waste generation to grow?
2. What are the impacts of increasing waste generation on the economy, environment and public health? Are we getting the best value out of waste?
3. How much effort should we put into waste avoidance, compared to waste recovery?
4. Should we do more to remove food, organics, plastic and paper from landfill? What would be the value of this?
5. What are the barriers to removing these materials from landfill? How could they be overcome?
6. What impact will the carbon tax have on waste management in Victoria?
7. What information can you provide to the State Government about how these drivers affect waste management?
8. Are there other drivers that should be considered by the review?
9. Which aspects of current policy have worked well and should be retained? Which aspects have not worked well? Are there gaps?

## **Developing a new direction for waste management**

10. What is your vision for waste management in Victoria? What are your needs and expectations for waste management in Victoria?
11. What are the important ideas and outcomes that policy objectives need to include in the development of waste policy?
12. What ideas should be addressed by decision-making principles?
13. Should the waste hierarchy, or a cost-benefit analysis of the environment, economic and health and well-being impacts, be used in decision-making?
14. What targets and performance measures could be used to measure and evaluate our success in achieving our policy objectives?

## **Achieving our vision for waste**

15. Are there significant, ongoing market failures and barriers that require government to intervene in waste management activities? If so, what is the role of state government in responding to these failures?
16. Do current services and infrastructure to recover materials meet business, community and environmental needs? If not, what should improve?
17. Is infrastructure to recover materials, while protecting the environment and health, adequate?

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18. How can the State Government provide the right policy environment to support good investments?
19. What is the role for State Government in working with industry and local government to achieve efficient and effective investment?
20. Is there a role for State Government in developing and creating markets for recycled products? If so, what is it?
21. How can the productivity and growth of Victoria's waste management system be maximised?
22. What market based instruments might Victoria use to get maximum value from waste generation and recovery?
23. What are the major opportunities to reform waste regulation to better protect the environment and reduce red tape?
24. How can we prevent and improve our handling of illegal dumping?
25. Should infrastructure planning for each waste sector be improved?
26. What is the right balance between planning for local and for statewide needs and how can it be achieved?
27. How can links between infrastructure planning and approvals processes be improved?
28. Does the current Victorian land-use planning framework adequately facilitate the establishment of innovative waste processing technologies?
29. Has enough been done to clarify roles and responsibilities?
30. How can decision making by agencies be better coordinated?
31. What opportunities may arise from the national policy agenda? What problems might need to be managed?
32. What additional information is needed about waste management?
33. How could the current waste knowledge management system be improved, and what might be the benefits? How can we ensure that the costs of gathering more data do not outweigh the benefits?
34. What types of information and facilitation could help businesses increase productivity through waste avoidance and recovery?

## General comments

35. Please list your top three issues around waste in Victoria.
36. Any further comments that you would like to make.

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## Submitting feedback

Your feedback will help to prepare a new Victorian solid waste policy and as such, may be made public. If you would like your contribution to remain confidential, please mark this clearly below. Please note, Freedom of Information access requirements will apply to all submissions, even those treated as confidential. For information about the DSE Privacy Policy you can go to [www.dse.vic.gov.au/privacy-policy](http://www.dse.vic.gov.au/privacy-policy)

## Do you want your input to remain confidential? If so write 'yes' here: YES

Please submit your comments and feedback in one of the following ways:

- By email to [wastepolicy@dse.vic.gov.au](mailto:wastepolicy@dse.vic.gov.au)
- By post to

Project Manager Waste Policy Review  
Department of Sustainability and Environment  
PO Box 500  
East Melbourne VIC 3002

## Personal details

Your personal, business and contact details will be kept confidential. By providing them, we can keep you informed of the next steps and how the solid waste policy develops.

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We appreciate your interest in helping to prepare a new Victorian solid waste policy and taking the time to provide your comments and evidence in the following section.

**The Waste Policy Review Team**

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**Respond to as many, or few questions as you wish, ideally providing supporting information, evidence and data:**

**Question: 3 How much effort should we put into waste avoidance, compared to waste recovery?**

The waste hierarchy is the basis for waste management across Australia. Waste avoidance, reduction and reuse should be seen as a key part of the waste management system and a firm objective for the State. The lack of focus and acknowledgement of work in this area is shown in Figure 1 of the Waste Policy Review Discussion Paper which does not depict avoidance, reduction or reuse as part of the system.

As identified in the Discussion Paper, in the past waste avoidance activities have focused mostly on individual enterprises or households. Waste avoidance programs need to focus on both the residential and commercial sectors. Programs should include funding provision to support individual enterprises to avoid waste as well as larger scale programs at an industry or sector level. Waste avoidance programs and funding should be targeted to the area where the greatest achievements are possible

**Question 4: Should we do more to remove food, organics, plastic and paper from landfill? What would be the value of this?**

Yes, there should be a stronger focus on removing organic materials, including food waste and paper, from landfill. There is little understanding in the community about the negative impact of sending organics to landfill. Highlighting this issue in a State-wide education and media campaign and providing simple actions that can be implemented in the household may assist in increasing awareness and promoting behaviour change.

City of Melbourne expects that the amount of food waste will continue to increase in the municipality as residential and commercial growth in the central city drives demand for more local food businesses.

More support is needed in providing facilities that allow for pre-sorting and processing of organic and food waste before disposing of residual waste to landfill. Home composting should continue to be encouraged, however this is not an easily implemented option for residents in multi-unit dwellings. In addition to composting, there should be a focus on educating consumers (both individuals and commercials) to reduce food waste at point of purchase.

Consideration should be given to landfill bans for particular waste streams, such as unprocessed organics, as has been adopted in Adelaide.

The value of removing organics and food waste from landfill is multiple:

- resource conservation through waste reduction, reuse or recovery
- reduction in environmental impacts of landfill, including methane emissions and other impacts

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- through waste reduction and better waste management, reducing other environmental and amenity impacts, such as fewer bins on streets and fewer truck movements for waste collection.

More should also be done to divert plastics from landfill. An increase in plastic being sent to landfill indicates that there is a need for improved understanding amongst the community about plastic packaging and its recyclability. The waste policy should aim to address this issue with strategies for a holistic approach taking in to account the complete lifecycle of plastic packaging from cradle to grave.

The Discussion Paper does not identify other priority products or materials. Identification of priority products, materials and waste generation sectors may assist in targeting action in the areas where funding or other assistance is most required.

Consumption and disposal data on specific types of products (for example, electrical and electronic waste), rather than focusing only on materials, may assist in quantifying the value of programs to recover these items as well as support the basis for initiatives to be developed in partnership with industry to reduce the waste element of these products.

## **Question 5: What are the barriers to removing these materials from landfill? How could they be overcome?**

Inadequate infrastructure is a major barrier to removing these materials from landfills. There is a lack of large-scale processing facilities for mixed waste and food organics. The sorting infrastructure at existing materials recovery facilities (MRF) is also inadequate. Funding support from the landfill levy should target specific infrastructure gaps, for example, support should be provided to MRF operators to enable them to upgrade their infrastructure to ensure plastics can be recovered.

The need for education and behaviour change is also a barrier in many areas, including:

- There is a lack of understanding of the importance of source separation by households and businesses, particularly of food and organic waste. To date, the focus has mostly been on plastics, paper, cardboard, steel and aluminium.
- There is confusion in the community around recycling plastic bags, with many people bagging their recyclables before placing in their kerbside recycling bins. When the MRFs introduce plastic film recovery methods, an education campaign focused around 'bagging your bags' and creating understanding about how to recycle plastic bags would be beneficial.

Simple, action-oriented messaging demonstrating practical ways to source separate and recycle items such as plastic bags would assist in overcoming this barrier. Particular focus should be given to hard-to-reach communities. The transient nature of residents within the City of Melbourne indicates that education programs would be most effective if implemented on a State or metropolitan-wide scale.

Other barriers include;

- source separation is impractical or inconvenient for some households or businesses, for example high rise dwellers often have far more convenient landfill disposal than recycling and many small businesses don't have space for a second or third waste stream

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- separate collections for food waste may not be practical in congested, high density areas
- many businesses don't have direct control over their waste management systems, for example where they are managed at the building or facility level a business may not have access to recycling services
- local governments can introduce local laws to say that material must be source separated but this is difficult to enforce
- market barriers – there is a lack of viable end markets for recycled products
- product and packaging design, for example composite products that can not be recycled.

Each of these barriers needs to be considered individually and strategies to overcome them developed. For example, State planning provisions should ensure adequate waste and recycling systems are mandatory in new developments by requiring that all planning applications are accompanied by a waste management plan which is approved by the council. When developing strategies, lessons could be learnt from the increase in recovery from the construction and demolition sector. For example, what has been the impact of investment in sorting and processing facilities for mixed C&D material? Could this be replicated in other sectors?

## **Question 8: Are there other drivers that should be considered by the review?**

Yes, there are many other drivers that may impact on waste generation and disposal behaviour, including:

- dwelling size and type
- increasing consumption levels overall
- pace of life – more takeaway food consumed, less time available
- product and packaging design, which influences materials use and recyclability
- social norms
- garbage and recycling bin capacity
- convenience of access to recycling facilities
- drought / rainfall – impacting the amount of garden organic material
- available processing sites
- price of recycling or composting services (C&I)
- property management standards and trends

The review should identify the drivers that can be influenced by the waste policy and accompanying legislation. The full suite of tools for influencing these drivers should be considered.

## **Question 9: Which aspects of current policy have worked well and should be retained? Which aspects have not worked well? Are there gaps?**

One of the key elements of waste policy in Victoria is a fully hypothecated landfill levy. The levy should continue but the distribution of funds needs to be more transparent. An annual account should be publicly available showing how the funds have been distributed. This is particularly important given the introduction of the carbon tax, which will further increase the price of landfill disposal. The levy funds should be completely returned to the waste management sector.

More regulatory intervention in waste management should be considered, such as landfill bans for unprocessed organic material or for unsorted C&I material. Experience in other jurisdictions

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in Australia and overseas should be understood in order to maximise the effectiveness of this type of intervention.

There has been a lack of a publicly available implementation plan for the actions outlined in the Towards Zero Waste strategy and a lack of public review and reporting against these actions.

Another gap in the Towards Zero Waste strategy is that single targets were set for the whole of Victoria rather than splitting these in to metropolitan, regional and rural areas. As a result, many local governments set targets in line with the state target where in reality if the state target was to be met, metropolitan local governments would need to achieve much higher diversion rates than their rural counterparts.

## **Question 10: What are your needs and expectations for waste management in Victoria?**

Local government plays a very significant role in waste management but needs and expects other levels of government to have greater involvement. This involvement needs to be in the form of:

- setting a clear strategy, including vision, objectives, targets and measures
- identifying state and metropolitan-wide activities that must occur to meet the strategy and creating an action plan
- implementing the action plan, including providing funding support, enacting legislation, undertaking state-wide education and behaviour change campaigns and working with industry and other levels of government
- tracking and publicly reporting the action plan implementation and the targets and measures.

## **Question 11: What are the important ideas and outcomes that policy objectives need to include in the development of waste policy?**

**Three key ideas that need to be included are as follows:**

1. Waste management must be integrated across the lifecycle of products (e.g. consideration at the design and use stage as well as disposal); across those responsible for waste (waste generators and waste managers) as well as geographically (a network of waste processing and disposal facilities and implementation of strategies and programs that involve all local governments in metropolitan Melbourne or across Victoria).
2. Waste disposal systems must be intuitive, that is, the right disposal decision should be obvious to the waste generator. The right disposal decision is the one that ensures the best use of resources.
3. Waste management should strive to obtain the greatest value from recovery of materials. However, if recycling or resource recovery is more costly than disposal to landfill, other benefits need to be considered before discounting the recovery of these materials. Financial support needs to ensure that resources are not wasted simply because they don't have a significant financial value at this moment in time.

The waste policy objectives must also include:

- waste avoidance and reduction
- maximising the useful life of materials through reuse and recycling



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- reducing the amenity impacts of waste management
- ensuring that waste management systems are simple and intuitive

## **Question 12: What ideas should be addressed by decision-making principles?**

The list of ideas outlined in the Discussion Paper are generally supported, however market mechanisms should not be the main way of recognising the value of waste.

Other ideas that should be addressed by decision-making principles include:

- identify priority products and materials and develop specific approaches for recovering them
- programs, processes and methods should be developed to determine best practice
- focus on forward thinking with relevant forecasts and trends considered
- shared responsibility; - involving industry to recognise their responsibility for a product throughout its lifecycle.

## **Question 13: Should the waste hierarchy or a cost benefit analysis of the environmental, economic and health and well-being impacts, be used in decision-making?**

The waste hierarchy should be used in decision making to prioritise how funding dollars are spent.

Cost benefit analysis alone is not adequate for decision making. Social and environmental benefits are often very difficult to identify and to apply financial values to; therefore they are not given the same level of consideration as economic benefits in decision making.

## **Question 14: What targets and performance measures could be used to measure and evaluate our success in achieving our policy objectives?**

The type of targets included in the Towards Zero Waste Strategy (reduction in waste generation, increase in landfill diversion) should continue to be used. While a small number of targets may only provide limited information, they are a clear indicator of progress.

However, there are a number of ways that the targets and measures, and the tracking and reporting against them, could be improved.

Targets and performance measures must be able to be assessed using readily available data. In the past there has been a long delay in assessing and publicly reporting data against the targets in the Towards Zero Waste strategy. The assessment and reporting process should be undertaken in a timely manner in order to provide relevant feedback to councils and the community.

Targets adopted at the state level should be broken down so they can be adopted and/or understood at other levels. For example, municipal solid waste diversion should be split into metropolitan and non-metropolitan or some other geographic grouping in order to identify a higher target for metropolitan councils.

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Local governments and others with data reporting responsibilities should be advised how the data should be reported and presented so that over time a standard reporting framework can be adopted as a requirement of waste management services contracts. The State Government should consider what resources are needed to allow for collecting of data and should provide support by establishing systems to allow for the collection of appropriate data.

In addition to reporting against targets, the action implementation and landfill levy expenditure should be publicly reported.

**Question 16: Do current services adequately meet business and community needs? If not, what should be improved?**

No. In metropolitan Melbourne there is a lack of sufficient sites to recover and process materials, in particular organics processing, the ability to pre-sort materials prior to landfill disposal and waste-to-energy facilities for circumstances where source separation is not practical.

Currently the City of Melbourne is unable to offer a green waste bin to residents. For the majority of our residents, who live in multi-unit dwellings, this is not a problem, however there are some residents who would prefer to have a green waste bin than the existing monthly on-call garden organics service. Modelling has shown that the introduction of a garden organics service for City of Melbourne's outer suburbs (e.g. Carlton, North Melbourne, Kensington) would not be cost-effective. Similarly, it is not practical to introduce source-separated food organics collections within the City of Melbourne. The lack of landfill disposal alternatives for our garbage stream is a significant problem.

Existing commercial and industrial waste management arrangements are resulting in unnecessary amenity and environmental impacts. These include congestion and emissions from truck collections, odour and visual amenity impact from bins stored in the public space as well as low recycling rates in many industries. State government should implement regulatory and other measures to improve waste management in the commercial and industrial sector.

**Question 17: Is infrastructure to recover materials, while protecting the environment and health, adequate?**

No. Current waste infrastructure is inadequate in a number of areas including:

- materials recovery facilities (MRFs) should have bag-opening capabilities to enable bagged recyclables to be recovered. They should also be able to recover plastic film (perhaps through a 'bag the bag' approach)
- a network of food organics recovery facilities is needed for both municipal and commercial and industrial waste
- waste-to-energy facilities are required where other recovery options are not possible.

**Question 19: What is the role for State Government in working with industry and local government to achieve efficient and effective investment?**

State Government should;

- provide funding to enable small and medium-scale pilot infrastructure projects
- provide seed funding for large scale infrastructure projects

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- continue to enter into contracts on behalf of local governments via the Metropolitan Waste Management Group
- provide regulatory certainty to encourage investment in organics processing and alternative waste technologies
- conduct research and provide advice in areas such as new technology
- invest in assisting industry to develop better designed waste management infrastructure, for example, stronger bins to cope with high rise chute systems.

## **Question 20: Is there a role for Government in developing and creating markets for recycled products? If so, what is it?**

Yes. State Government needs to enact legislation that reduces materials accepted in landfills such as food and organic waste. This will encourage the development of resource recovery as industry looks for new ways to recover recyclable materials.

Other regulatory options such as lower costs of disposal or reduced landfill levy for the disposal of residual material from waste processing should be considered.

State Government should make funding available for research and development in areas such as sustainable packaging design, reuse and recycling applications as well as supporting research in to particularly problematic waste streams such as nappies and waxed cardboard. This may assist in creating new markets for these hard to recycle products.

## **Question 24: How can we prevent, or improve our handling of illegal dumping?**

A state-wide campaign should be undertaken to educate the community about the negative impacts of illegal dumping as well as the benefits of living in a clean neighbourhood where dumping of rubbish is not tolerated.

Funding should be used to assist local governments to support more than one hard waste collection each year. This would be particularly beneficial for municipalities with a high density of student housing. City of Melbourne runs a 'Spring Clean' program which offers an extra hard waste collection service once a year. A similar program could be targeted to international students with a 'Semester Clean' aimed at preventing the dumping of unwanted furniture before returning home overseas at the end of the university semester. Consideration should also be given to the potential for re-use and recycling of these dumped items.

The State Government also needs to consider investing funds to assist in the better management of charity bins, including their location and supervision. New high rise developments with over 70 apartments could include a stream for charity waste to help alleviate the flood of illegal dumping at car-park based charity bins.

## **Question 28: Does the current Victorian land-use planning framework adequately facilitate the establishment of innovative waste processing technologies?**

No, in trying to establish a boutique recycling facility in the central city to service a number of businesses in a laneway, the City of Melbourne encountered a prohibition under Section 52.10 of the Melbourne Planning Scheme.

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The scope of the proposed facility would not impose a detrimental impact on the amenity; however the current Melbourne Planning Scheme creates a barrier to allowing the establishment of this innovative waste management initiative. A review of the scheme in relation to waste management is required to ensure it allows for innovation and new technology and is in line with the objectives and actions of the waste policy.

There is also a need for:

- Certainty around the acceptable uses of outputs of organic recycling and alternative waste technologies, including waste-to-energy facilities;
- Clear policy on acceptability or otherwise of different types of waste-to-energy facilities.

### **Question 37: Please list your top three issues around waste in Victoria.**

1. Waste management in multi-unit developments (e.g. relative inconvenience of recycling in high-rise apartments)
2. Amenity and environmental impacts from commercial waste management, particularly in the central city area of the City of Melbourne.
3. Lack of available infrastructure to allow alternatives to landfill disposal.

### **Question 38: Any further comments that you would like to make.**

The state government should enact legislation to require all new developments to submit a waste management plan that adequately addresses space, systems and collection methods for all waste streams as part of the statutory planning process. This should also apply for commercial properties that are changing use and subsequently applying for planning approval to renovate their premises. State legislation should enable Local Governments to require consideration for waste management as part of the planning approval process.