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Dear Meredith

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SUBMISSION TO THE DRAFT BEST PRACTICE GUIDE FOR WASTE MANAGEMENT IN MULTI-UNIT DEVELOPMENTS

On behalf of the City of Melbourne, thank you for the opportunity to comment on the draft Best Practice Guide for Multi-unit Developments. We support the development of the guide but there are some specific issues we wish to comment on, as follows.

1. In dwelling storage

We support the suggestion that containers be provided to residents for transportation of recyclables from the apartment to the disposal point and that sufficient storage space inside the dwellings is required. This should be expanded further, to include:

- 1.1. Examples of internal designs showing sufficient allocation of space within the kitchen or another convenient area (either within Section 2 or relevant points within Sections 5, 6 and 7)
- 1.2. Information on suitable containers (such as the "MURFE"¹) (within Appendix B)

2. Signage

Adequate signage at disposal points is vital for ensuring correct separation of recyclable material. The following additions are requested in the sections on signage:

- 2.1. Further examples of available and/or appropriate signage should be included in Appendix E. The standard signage available on Sustainability Victoria website is one source; an alternative source of signage is the relevant council, who may have signage that they prefer is used within their municipality.
- 2.2. The need for appropriate signage at the garbage chute inlet should be included on page 19 and/or 27.

¹ Multi-Unit Recyclers for Everyone, http://www.sourceseparationsystems.com.au/sys_murfe.html

3. Standards

It is noted on page 19 that "waste handling equipment, including chutes and compactors, should conform to the relevant design and safety standards". A list of current relevant standards may be useful.

4. Suitability of equipment

In a number of areas throughout the document the suitability of certain types of equipment is specified. In some cases this may be misleading, for example:

- 4.1. Static compactors are noted on page 29 as being not suitable for recyclables but may in fact be appropriate for paper and cardboard streams.
- 4.2. Chute systems are noted on page 60 as being unsuitable for recyclables. It appears that this may no longer be the case. A recent waste management plan, submitted for a 5 towers development in the Docklands, included four towers with dual chute systems one for waste and the other for recyclables. (Note Engineered by WasteTech called a smooth tube). It may be worth including this as a fourth option within Sections 6 and 7.
- 4.3. In-sink food waste disposal units are included in Appendix B (page 104). It would be useful to include within the guide the current position of the metropolitan Melbourne water authorities as to the use of these units.

5. Dealing with cardboard in garbage chute systems

Sections 6 and 7 should include further comment on dealing with cardboard. This material can block rubbish chutes (and recycling chutes), causing inconvenience and a fire hazard. While a note is included stating that "bulk bins may be provided for recyclables, such as paper and cardboard", there is a lack of detail in the description of the options or in the diagrams as to how cardboard will be managed.

6. Options within Sections 5, 6 and 7

Sections 5, 6 and 7 include an option that incorporates a garbage chute and an MGB for recyclables on each floor, within the same area that houses the garbage chute inlet hopper. We note the following about this option:

- 6.1. This system may be designed into the building at the planning stage but requires significant ongoing commitment from the building managers to maintain the system and to ensure that the recycling material is not overly contaminated.
- 6.2. This system was implemented at QV apartments in 2006 and then removed in 2008 due to massive contamination issues. The material from recycling bins placed on each floor contaminated a whole truck load that was rejected at the processing plant and sent to landfill. As the QV building manager was unable to ensure that the recycling bins would not again contaminate the system, these bins were removed from each floor and a central drop off at the basement floor was initiated. Although the volume of recycling has decreased the quality has improved dramatically.

- 6.3. Based on the experience above this system of bins/chutes on each floor, if applied, should:
 - 6.3.1.Require that the rubbish system is the closest/easiest to use option for residents and that the recycling system is the harder/further away option. This will ensure that contamination rates are lower as those that really want to recycle are more likely to work that tiny bit harder to drop of their material whereas the uncommitted can drop into the rubbish without contaminating the hard work of the others.
 - 6.3.2.Require that the rubbish and recycling chute/bins are clearly different systems. ie. That the openings are different shapes and that the chute/bins are different colours. Red was waste, yellow for recycling and blue for cardboard/paper.
- 6.4. An alternative to this system is a garbage chute from each floor and a central storage area for recyclables and garbage, accessible by all residents, for example in the car park of a building. This system is in place in a number of apartment buildings. It would be useful to include this system within the guide, if not as one of the options then to explain why it is not included as one of the options. A comparison of diversion rates and contamination rates achieved under this option compared with other options would be useful.
- 6.5. Another alternative that has been tested by Council and in a new building would greatly increase the recycling rates is introduction of recycling bins on car park floors. In many large tower complexes there are multiple car park floors where residents come and go each day to their vehicles/bikes and can easily deposit their recycling into bins strategically placed at entry/exit point on these floors. This would require building managers/body corporate to undertake the servicing of these bins to ensure that they are presented for collection and not overflowing or creating a dumping ground. We found that locked bins with a round opening in a yellow lid worked best as it stopped people from over filling the bins. But it made collections more difficult due to the locks.
- 6.6. For many existing buildings it will not be possible to locate a recycling MGB in the garbage hopper inlet area. It may be the case that the only possible solution for providing recycling services is to have residents take their recycling material to a central bin area.
- 7. Calculation of waste generation rates
 - 7.1. The explanation of calculation of expected garbage and recyclables generation on page 87 is unclear. It is not apparent how the information from the 2001 Sydney study has been used to provide the rule of thumb allowance for waste storage (L per week).
 - 7.2. The information on page 87 (80L garbage/week; 40L commingled recyclables/week) contradicts that included on page 20 (60-120L of each per week).
 - 7.3. Information on waste generation rates should be based on the number of beds or expected occupancy rather than number of units. Please note that currently

Council only differentiates the generation of residential waste for studio/1 bedroom apartments as 2 bedrooms or more is set at 120L per week (our standard allowance).

8. Appendix F - Checklist

The checklist may become a quick reference guide that is used more frequently than the body of the guide itself. In order to retain the focus on maximising diversion of recyclables, it should include the following question within the section "selected garbage and recycling systems (general)": Does the system encourage the maximum source separation and diversion of recyclables?

Thank-you for the opportunity to make this submission. If you have any further inquiries, please feel free to contact me by phone on 9658 9951.

Yours sincerely

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CoM reference

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