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18 December 2015

Mr Rob Millard
CEO
Metropolitan Waste and Resource Recovery Group

Dear Mr Millard

Draft Metropolitan Waste And Resource Recovery Plan

The City of Casey supports the Draft Metropolitan Waste And Resource Recovery Plan and offers the following Feedback.

Priorities

Priority 1: Group Procurement

There is support for the concept of group procurement for disposal and especially any future move to Alternative Waste Treatment options, which is unlikely without a cooperative approach.

There however needs to be improvement to the regional contract management model and communication from the region to participating councils regarding contract issues. Councils are relinquishing a certain amount of control under these arrangements and decisions are not always communicated in a clear or timely manner. There are a number of long running unresolved issues in the current contracts and officers have been frustrated with delays in the regional response to dealing with these. This appears to be changing with the recent appointment of an additional regional resource.

With respect to current contracts the statement *"The contracts collectively expire on 31 March 2021."* is technically not correct. The South Eastern (SUEZ) contracts expire in March 2017 with two more options of two years each. Satisfactory negotiation of extensions has not proceeded.

There is also little evidence that group procurement will have economic benefits for collection contracts. The former South Eastern Regional Waste Management Group commissioned a report by Access Economics to explore the benefits of a sub-regional contract for collection involving a group of Councils including Greater Dandenong, Cardinia and Casey. The findings resulted in the proposal being rejected.

Priority 2: Organics Processing

There is support for the concept of group procurement for organic treatment options in order to achieve a better environmental outcome; however this will come at a significant cost to Councils.

The metropolitan organics processing network will:

achieve quantities for reprocessing by consolidating and aggregating organic material to maximise economic outcomes, cost effective service delivery and achieve economies of scale.

This seems instinctively correct; however it does not match the current evidence and may therefore be misleading. Participation in group procurement for the South East Organics will cost Council significantly more each year than the current single Council contract. City of Casey will pay an additional 32% to participate in the regional contract.

The benefit from the City of Casey perspective is regional. This arrangement will facilitate moving to higher technology in order to address a history of poor environmental performance of a number of green waste facilities around Melbourne, (not including Casey's current provider).

Priority 2 also facilitates the potential move to add food waste to the green waste processing stream therefore increasing waste diversion. This however will come at a further increase to the cost per tonne.

There needs to be more analysis and evidence that this is the correct strategy for Melbourne as opposed to treating the residual bin with the food fraction remaining.

There are a number of risks and issues associated with the current direction including:

- How collected – comingled with green waste or separately. Comingled risks contaminating the relatively clean garden waste stream. Collecting separately adds a fourth bin to the household and increases collection costs.
- Collection frequency – Does comingled food and garden waste need to be collected weekly rather than fortnightly. The garden waste bin is already relatively heavy. Can residual be reduced to fortnightly?
- Cost of kitchen top caddies and biobags

This was raised at the recent local government workshop and it was clear that the issues are not yet well understood and has not been presented as part of the Plan. The City of Casey would insist on further analysis (as suggested by 4.1.1) before committing to this action.

The Food and Garden Organics Best Practice Collection Manual (2012) published by the Federal Government provides an introductory evidence based discussion of the issues.

Priority 3: Hubs

There is support for the concept of hubs and particularly the opportunity to co-locate new infrastructure. Ideally a hub could offer opportunity for the concept of industrial ecology.

Hubs and spokes need to be better defined.

Currently the pressure is on existing hubs with direction for future locations absent from the Plan. The South East is at risk of a monopoly. This has been highlighted by the recent decision around future use of facilities in the identified hub in Kingston/Clayton/Dingley Precinct which may add pressure on the Suez Hallam Road precinct.

The identification of the SUEZ hub also raises the question of community engagement. Specifically community expectations may be that waste activities will cease with the closure of the current landfill at Hallam Road. Residents should be made aware of the potential for continuation of a waste Hub beyond the expected life of the landfill.

Priority 4: Planning policies and tools

Casey supports and participates in the current work around buffer protection. Currently buffers are not well protected. It is also not clear what status a hub affords and how designation as a hub offers protection to existing or future waste related landuse.

If adequate planning controls are introduced to deal with the issue of 'reverse separation distances' to protect waste industries, the EPA should be given statutory status for encroaching applications.

Casey supports a consistent approach for waste management for multi-unit developments.

Priority 5: Small onsite organic processing infrastructure

Casey supports this as an action.

Priority 6: Develop a Transfer Station Growth Strategy

Casey supports this as a priority.

Priority 7: Establish commercial relationships

Casey supports this as an action

Priority 8: Maximise recovery of priority materials

Casey supports this as a priority; however Casey is wary of potential cost shifting to councils. By way of example the continued burden of mattresses and tyres collected through hard waste services and potentially from the banning of all e-waste to landfill in 2017.

Two advocacy areas are better product stewardship and more effective use of Landfill Levy money to directly assist Councils collect and dispose priority materials.

Priority 9: Community engagement

Casey welcomes Regional Support in community engagement and education activities.

Priority 10: Support delivery of Statewide Education Strategy

Casey prefers the State to provide support for educational delivery; however remain sceptical about a blanket state-wide approach, which may not pick up on demographic differences and be less agile to changes in systems eg. expanding items acceptable in recycling. It also has potential to focus on issues considered less important and potentially cost prohibitive for individual councils eg Casey does not consider bin colour alignment as a priority. The cost to comply could not be justified particularly in a time of rate capping.

Council would be more supportive of a regional approach based on like councils ability to deliver. For example Outer Metropolitan vs Inner Metropolitan vs Regional.

Casey would also call for an analysis on the effectiveness of Get it Right on Bin Night Campaign before committing to additional state wide programs.

Responses to specific comments

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Waste avoidance, litter reduction and illegal dumping are not within the scope of the Metropolitan Implementation Plan, however it is part of the government's broader strategy.....

There should be more deliberate wording around how these issues will be dealt with and how they interact with this Plan. Waste avoidance has always been regarded as the highest priority of the waste management hierarchy.

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1.6 How can I get involved?

I think this was a missed opportunity for the region to engage more effectively with Councils particularly to help recruit community participation in the public consultation days.

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Communities want manufacturers to be made more accountable for goods they produce that ultimately get disposed at landfill....

There is an opportunity here for the Region to use this community feedback to be an advocate for the implementation of a more effective product Stewardship Scheme.

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Figure 8 identifies nappies as 6% of waste entering landfill. This is the only single product identified in the data and yet there is no discussion on how this may be addressed.

Nappies could also be a blocker for any attempt to reduce frequency of residual bin collection in conjunction with removal of food waste. This will be more of a problem for municipalities with a high percentage of 0 to 4 year olds.

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4.1.1 Analysis of Future Needs

Agree that all of these items need further analysis before commitment.

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I believe the Sacyr facility is due to be operational in October 2017.

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The Nillumbik experience needs to be analysed more closely as part of 4.1.1 above.

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Buffers: While the Landfill BPEM applies a 500 metre to landfill, this does not provide adequate protection and can be encroached. Very recent subdivisions have been approved within the buffer zone to the Hallam Road facility based on sign off by EPA accredited auditors.

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Challenges

The move from landfill to alternative treatment facilities will not happen until there is decisive leadership from State and Federal Government.

This can be achieved in a number of ways such as legislative driver and/or better use of Landfill Levy through significant projects such as securing suitable land for siting resource recovery infrastructure.

Providing certainty to the waste sector would help reduce the cost differential between landfill and alternative technologies.

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Typo; Eastern Metropolitan Area

Yours faithfully

Michael Jansen
Manager, Waste and Recycling