

City of Melbourne Submission

Thank you for the opportunity to comment on the Metropolitan Implementation Plan Consultation Draft (the consultation draft).

City of Melbourne recently adopted the Waste and Resource Recovery Plan 2015-18 (CoM WRRP), which is our action plan for waste management. The objectives of the plan are to increase resource recovery, reduce waste to landfill and improve local amenity. Ten initiatives have been identified for the three year period, each of which is made up of a number of actions. The links between the City of Melbourne plan and the consultation draft are identified below.

Priority actions

The Consultation Draft identifies 10 priority actions. Comments on each action are provided below.

Priority 1: Minimise councils' reliance on landfills through group procurement of residual waste collection and processing that progressively increases the resource recovery rate over the contract duration.

City of Melbourne is one of the 26 participating councils with landfill service contracts managed by MWRRG. These contracts expire on 31 March 2021.

This priority action is supported by Initiative 4 of the CoM WRRP, which includes an action that City of Melbourne will advocate for advanced waste treatment infrastructure within the inner metropolitan area.

City of Melbourne supports the MWRRG undertaking a group procurement for an advanced waste treatment (also known as advanced resource recovery technology or ARRT) facility and encourages MWRRG to start work on this process early in 2016. Priority should be given to inner city councils that cannot introduce a universal third bin for organic waste and to councils in areas with limited landfill capacity.

The cost difference in gate fees between landfill disposal and resource recovery alternatives will be a major challenge for this action. The information provided in the consultation draft indicates that the gate fee at an ARRT facility would be more than twice the City of Melbourne's current landfill gate fee including the landfill levy fee. In adopting the Metropolitan Waste and Resource Recovery Implementation Plan, the Victorian Government should commit to providing substantial seed funding to establish an ARRT facility and reduce or eliminate this gate fee differential.

City of Melbourne may not participate in the waste collection component of the proposed group procurement. Our collection service is very different to that provided by other councils and we may not benefit from a collective procurement for waste collection. This would be considered as the procurement process develops.

Priority 2: Build the metropolitan organics processing network and maximise the network's productivity by accepting household and commercial food waste.

This action is supported by City of Melbourne. No further comment.

Priority 3: Ensure hubs support industry while protecting communities and the environment through defining the role of a hub, promoting best practice, and acting on opportunities to co-locate with water utilities.

A hub is defined as a facility or group of facilities that manage or recover waste streams. The discussion of 'hubs' should consider three levels of hub: regional (metropolitan-wide), local (council-wide) and precinct (shopping strip/city block) hubs. The consultation draft focuses on regional hubs, but local and precinct hubs play an important role which should be acknowledged. An example of a precinct hub is the City of Melbourne's Degraeves Street Recycling Facility, which services over 70 businesses.

Priority 4: Develop planning policies and tools that facilitate resource recovery targeting:

- protection of buffer separation distances of waste and resource recovery facilities
- provisions for recycling infrastructure in multi-unit developments

City of Melbourne supports this action. The City of Melbourne's Guidelines for Preparing a Waste Management Plan for New Developments, introduced in 2010, have been pivotal in ensuring that best practice recycling infrastructure is installed in multi-unit developments. This action also reflects Initiative 1 of the CoM WRRP (High-Rise Recycling Program).

Priority 5: Support and promote small on-site organic processing infrastructure

City of Melbourne requests that this action be expanded to include precinct-based infrastructure and to include infrastructure for other types of resource recovery. The priority should be re-worded to: "Support and promote small on-site or precinct-based infrastructure for organic processing and other resource recovery".

The City of Melbourne's Degraeves Street Recycling Facility (CoM WRRP Initiative 3) is used as a case study in the consultation draft as part of the discussion on organics waste and commercial food waste. The Degraeves facility is also providing a valuable opportunity for the participating businesses to recycle their cardboard and comingled recyclables. This type of precinct-based facility for both organic processing and resource recovery could be adopted by other councils or by property managers of commercial, residential or mixed use properties.

On-site or precinct-based resource recovery infrastructure can also be beneficial without being associated with an organic processing infrastructure. City of Melbourne's laneway compactor and recycling hub program (CoM WRRP Initiative 2) provides precinct-based communal collection services for businesses and residents in four blocks of the central city. Each compactor and associated recycling hub is used by up to 150 businesses, most of which had no recycling service previously.

Section 4 of the consultation draft notes that the C&I sector and commercial collections are areas where more can be done to maximise resource recovery. While education is an important aspect of this, supporting the establishment of resource recovery hubs in commercial precincts with little or no recycling currently in place could substantially contribute to increased resource recovery. The consultation draft presented the results of 2014 landfill audits that showed that 31 per cent of material going to landfill was plastic, paper and cardboard, glass or metal. Much of this material could be recovered through this type of resource recovery hub.

Priority 6: Develop a Transfer Station Growth Strategy to facilitate a network that can manage projected waste volumes while maximising resource recovery.

City of Melbourne supports this action, particularly in relation to supporting transfer stations to increase recovery of materials before consolidation and transfer to landfill.

Priority 7: Establish relationships between commercial food waste generators and organic processors.

Increasing recovery of commercial food waste is important and is supported by Initiative 7 of the CoM WRRP.

This action as it is currently worded ("establish relationships") is too vague and should be further developed so that a more specific action can be identified in the final plan. In developing the action further, it will be important to consider:

- the key role that commercial waste collection companies will play in recovery of food waste
- the potential power of large commercial food waste generators (such as hotels/function venues and supermarket chains) to require to provide a food waste collection and that these organisations may be able to justify the increased cost as an action that supports their sustainability or corporate social responsibility commitments
- the difficulty for small-to-medium enterprises to exercise the same market power as large generators and their susceptibility to cost pressure.

Priority 8: Maximise recovery of priority materials (identified through Victorian Market Development Strategy) by establishing relationships between waste generators and the processing industry.

As per the comments on Priority Action 7, this action as currently worded ("establishing relationships") is too vague and should be further developed so that a more specific action can be

identified in the final plan. The action should also incorporate the role of the waste collection providers.

The Victorian Market Development Strategy has not yet been finalised. In addition to organics, the draft that was released in October for consultation identified rubber, e-waste and flexible plastics as priorities for recovery from waste generators. However, the consultation draft presented the results of 2014 landfill audits that showed that 31 per cent of material going to landfill was plastic, paper and cardboard, glass or metal. This priority action should be broadened to include these readily recyclable materials. This action would support CoM WRRP Initiative 10 (improved cardboard recovery) if broadened in this way. The action should also incorporate textiles which the audit results showed was 4 per cent of the landfill stream.

Priority 9: Community and stakeholders are engaged in waste and resource recovery decision making.

The increased focus on community and stakeholder engagement and the acknowledgement of the need for establishing the 'social licence to operate' is positive and supported.

Priority 10: Support residents and businesses to maximise recycling through local delivery of the Statewide Education Strategy.

The Statewide Education Strategy has not yet been released so it is not possible to assess whether that strategy will deliver the required education and behaviour change programs.

The action as worded currently ("maximise recycling") is too narrow in scope. It should be broadened to include waste avoidance as well as recycling.

This action should be re-worded to state: "Support residents and businesses to minimise waste and maximise recycling and resource recovery through local delivery of education and behaviour change programs".

Other comments

The Citywide Resource Recovery Centre on Dynon Road is identified in the consultation plan as one of 14 hubs of state-wide importance that are located within metropolitan Melbourne. We note the importance of this site, which is owned by the City of Melbourne and leased to Citywide.

The City of Melbourne's Degraeves Street Recycling Facility is included as a case study in the consultation draft. The establishment of the facility was supported by the Metropolitan Local Government's Waste and Resource Recovery Fund and its expansion to Centre Place was supported by Sustainability Victoria's Smarter Resource, Smarter Business Recycling fund. The facility now services over 70 businesses. City of Melbourne has committed to continuing and extending this facility as part of Initiative 7 of the CoM WRRP.

The discussion of material recovery facilities (MRFs) (Section 5.2.1, page 34) identifies the challenges for this sector. The opportunity to improve existing MRF infrastructure to increase the range of products being recovered should also be noted. In particular, bag-opening technology would reduce the amount of material being lost as bagged recyclables, which is the most common item of contamination in our kerbside recycling bin inspections.

The need to extend the processing capacity for residential and commercial organic waste is identified on page 41 of the consultation draft. The actions identified include "investigate opportunities for the use of infrastructure to service commercial and multi-unit development precincts". It would be good if this activity could be discussed in more detail in the final plan. Initiatives 6 and 7 of the CoM WRRP are focused on residential and commercial organic waste. City of Melbourne is currently undertaking a trial of on-site processing technologies at residential apartment buildings as part of CoM WRRP Initiative 6. The outcomes of the trial can be provided to MWRRG in mid-2016. If this trial is successful there may be an opportunity to incorporate on-site processing technology into the infrastructure being required in new developments.

The existing resource recovery and reprocessing infrastructure schedule (table 18, page 80) does not include food waste processing or e-waste. These facilities should be included as part of the schedule.