

## **Whitehorse City Council submission on the draft Metropolitan Waste and Resource Recovery Implementation Plan**

### **December 2015**

Whitehorse City Council appreciates the opportunity to provide comment on the draft Metropolitan Waste and Resource Recovery Implementation Plan (the draft Plan). We provide the following comments on the draft Plan:

#### **General comments on each of the Priority actions within the draft Plan:**

*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.*

While group procurement and aggregating large volumes of waste will provide benefit to Councils through improved resource recovery potentially at a better price, the draft Plan should allow for assistance to Councils, businesses and industry to implement smaller scale or local infrastructure that may use innovative or a networked resource recovery process. This would particularly be relevant if the local or smaller scale infrastructure could potentially be replicated across the metropolitan area.

Councils would benefit from access to low cost finance or funding to assist with the transition from lower cost resource recovery arrangements to the higher costs that are typically associated with large volume processing facilities that use higher technology for processing waste. The draft Plan does not provide much detail or consideration on the affordability or possible funding for major infrastructure upgrades and their impact on local government and the community.

Council is not convinced that there would be sufficient benefit in group procurement of waste collection services, particularly if aggregating the collection contracts resulted in fewer collection contractors and less competition. Council's currently benefit from the (almost) annual availability of a waste collection contract somewhere in Melbourne, which maximises competition and enable each Council to learn from the most recent tender/contract specification and build in service improvement for their next collection tender.

Given the long-term timeframe envisaged in the draft Plan, there is insufficient detail on the likelihood of Advanced Waste Treatment facilities playing a key role in recovering waste resources and consideration of waste-to-energy facilities.

*Priority 2. Build the metropolitan organics processing network and maximise the network's productivity*

The comments for Priority 1 above apply for the current MWRRG approach of aggregating and group procurement for organics processing infrastructure. There remains a role for potentially smaller scale processors that could deal with organic waste or for processing that can occur at a community level such as home composting and localised commercial organics processing. We note Priority 7 references establishing relationships between commercial food waste generators and organic processors, however this could be further expanded to consider acceptance of organic waste from small businesses and/or communal drop-off facilities.

The draft Plan should include an action to partner with industry and local government on the development, trial, implementation and promotion of community and smaller scale infrastructure to process organics (not just aggregated quantities).

*Priority 3. Ensure hubs support industry, while protecting communities and the environment, through:*

- *defining the role of a hub,*
- *promoting best practice*
- *acting on opportunities to co-locate with water utilities*

The development of well-planned and suitably located local and regional waste hubs is supported by Council. Council considers that there should be added emphasis to encouraging the co-location of compatible and complementary businesses that can share resources and where the waste outputs from one business can provide resource inputs to another business.

The draft Plan should include planning and establishment incentives, best-practice examples and pilot programs to maximise the number of suitable hubs within existing industrial zones, working closely with Councils and industry to identify and/or expand the current waste-related hubs.

Smaller scale community recycling drop-off facilities, reverse vending machines, and retailers participating in product stewardship re-use or recycling programs could be co-located in an industry hub. This would enhance job creation, marketing, transport and operational efficiencies across the hub.

The focus of the draft Plan needs to expand to beyond opportunities for co-location with water utilities to co-locate with innovative and technology-focussed organisations that can establish within existing industrial or commercial zone. Other examples to consider include the establishment of communal recycling hubs in shopping precincts, reverse vending machines and other such smaller scale infrastructure that could play a key role in spreading the resource recovery message and capturing a wider range of materials for recycling.

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

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

The State Planning scheme should include requirements for multi-unit developments to include recycling infrastructure as a minimum, and to encourage additional resource recovery of organic, electronic and hard waste where practicable.

Council supports this priority and suggests that the draft Plan should contain specific reference to working with Victorian Government, local Councils and developers to determine and implement improved Planning scheme requirements for improved recycling and re-use infrastructure within multi-unit developments. This could include the development of suitable metro-wide tools and information to ensure that waste management requirements have suitable standards that maximise waste minimisation and resource recovery, and they are enforceable.

The draft Plan should include incentives and industry engagement to retrofit existing infrastructure to capture and recover more recyclable resources.

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

Council supports this Priority and the proposed engagement with businesses and other organisations to better manage food waste on-site or in local hubs.

*Priority 6. Develop a Transfer Station Growth Strategy to facilitate a network that can manage growing waste volumes whilst maximising resource recovery*

The draft Plan must provide leadership and a clear action plan with a timetable as an outcome of the priority action to develop a Transfer Centre Growth Strategy. Many of the issues and infrastructure needs for Transfer Stations are well known and the draft Plan should not simply rely on the development of another strategy to increase resource recovery at Transfer Stations. The City of Whitehorse owns and operates a strategically located waste transfer station that returns a surplus to Council but requires an upgrade to provide the recycling services that the community demands. Council is developing a masterplan for the site to guide its development over the next 20 years. A partnership with the MWRRG would ensure that this development proceeds with a local and regional focus.

There is a particular need for Transfer Stations in the South and East of Melbourne to be given priority to maintain and expand their infrastructure in light of pending landfill closures in the South East, as well as encouraging and fast-tracking the establishment of new Transfer Stations in the South East.

The draft Plan should include priority actions to:

- Provide incentives for Transfer Station owners to invest in upgrading infrastructure and increasing the scope and quality of resource recovery facilities at Transfer Centres;
- Facilitate partnering arrangements with industry to capture and recover waste items such as polystyrene, re-useable furniture, textiles, and electronic waste
- Establish resale shops where practicable
- Upgrade infrastructure to enhance the user experience and make it easier to drop off recyclable or reusable items
- Expand the network of permanent drop-off locations for the Detox Your Home program
- Establish more bulk-haul Transfer Stations for municipal and commercial waste that requires processing at distant locations

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

Agreed – refer to our comments in Priority 3 ‘Hubs’ regarding the importance of co-locating complementary businesses

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

Agreed – refer to our comments in Priority 1 and Priority 2 regarding the need to encourage the development of smaller scale and local processors who will help to increase the recovery of priority materials, not just aggregating volumes for large scale processors.

There appears to be insufficient focus in the draft Plan on improving and expanding Product Stewardship arrangements that would potentially provide for improved infrastructure (or use of retail and manufacturing premises) to recover more recyclable and reusable materials.

The National TV and computer recycling scheme has demonstrated the success of government, industry and the public combining to recover large quantities of e-waste for recycling. While acknowledging that similar schemes for other priority materials may also need Australian Government support and regulation, the draft Plan should include more detailed actions to bring about increased Product Stewardship arrangements to maximise recovery of priority materials.

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

Community engagement should include incentives for the development and provision of domestic-scale infrastructure to enable the community to reduce waste at the source. A metro-wide waste program that replicates the principles of the successful light globe exchange program for households, and other energy-efficient incentives for households and businesses, would help the community and key stakeholders to take direct action themselves to recover resources, not just to be involved in decision making.

Council notes that the scope of the draft Metropolitan Waste and Resource Recovery Implementation Plan is to identify the infrastructure needed to manage waste materials after entering the waste and resource recovery ‘system’. The waste and resource recovery system is defined in the draft Plan as commencing at the separation stage where households, businesses etc separate the waste generated into differing waste and recycling streams.

Council further notes that waste avoidance, litter reduction and illegal dumping are not within the scope of the draft Metropolitan Waste and Resource Recovery Implementation Plan.

While it may be a definitional issue, we suggest that some infrastructure is required at the household/community level to assist with separation and waste minimisation, and the engagement of the community and key stakeholders. It is suggested that the draft Plan include incentives for and the promotion of suitable domestic-scale infrastructure to assist with home composting or similar community waste recovery actions.

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

Council strongly supports improving and increasing waste education. The draft Plan needs to outline in more detail the actions proposed to address the themes outlined on page 19 that came from community consultation in developing the draft Plan.

**Overall feedback:**

The draft Metropolitan Waste and Resource Recovery Implementation Plan seems to lack sufficient detail on the proposed priority actions to be considered as an 'Implementation Plan'. There is a lack of detail about what actually will be done, how, by whom and when for this draft Plan to be considered as an Implementation Plan.

Council's reading of the draft Plan is that it is more of an overall strategic Plan outlining the context and issues facing waste management infrastructure in Metropolitan Melbourne without providing clarity or the necessary detail on what will be implemented, by who, when, and how it will be implemented.

Many of the priority actions included in the draft Plan will require substantial funding investment by industry, government and the community. There is insufficient appreciation of whether the broad priority areas can be implemented in an affordable manner and within a reasonable timeframe.

There also seems to be too much reliance on group procurements and aggregating waste streams to suit regional-scale facilities compared with seeking innovative or smaller scale local infrastructure solutions to improve resource recovery.

Council looks forward to working closely with MWRRG on the development of the draft Plan. There are significant funds available from the waste levy and Council encourages the MWRRG to allocate funding for the implementation of the recommendations to improve the waste and recycling infrastructure in Melbourne.