

**Packaging Impacts Consultation Regulation Impact Statement
HOBSONS BAY CITY COUNCIL SUBMISSION**

This submission discusses the Council's key concerns with the Packaging Impacts Consultation Regulation Impact Statement (RIS) released in December 2011. The submission comprises a summary of key observations and issues, key facts about Hobsons Bay and its waste and litter profile relevant to packaging impacts and conclusions.

This submission includes a profile of Hobsons Bay City Council's waste and litter management services. The profile summarises the Council's waste and litter services relevant to a packaging resource recovery perspective.

Key issues and areas of support

Costs, amenity and environmental impacts of packaging materials such as plastics, glass, aluminium and steel are currently borne by the Council through kerbside recycling and garbage collection service, recyclables acceptance and sorting service, and municipal cleansing services including collection of litter bins and beach, street and stormwater drain cleaning.

The objectives of the RIS are to:

- reduce packaging waste and increase packaging resource recovery,
- reduce the need to landfill recyclable packaging materials
- reduce the negative amenity, health and environmental impacts of packaging waste and litter in line with community expectations, and
- promote a consistent national approach to regulating packaging.

The Council is supportive of these objectives.

Furthermore the Council is supportive of government initiatives that:

- ensures packaging manufacturers and suppliers share the responsibility of managing packaging waste
- has no further impact on local government operations and costs for implementation of new systems
- provides funding back to local government to continue and or improve kerbside at no cost to a Council for the packaging proportion of the garbage and recycling stream and litter services
- considers all packaging types and is not limited to beverage packaging
- considers the life cycle of packaging and therefore its sustainable design, recyclability, markets and systems for the recycling the packaging
- looks to infrastructure and collection systems that are beyond Local Government's kerbside systems or those in public places
- provides guidance to stakeholders not responsible for packaging waste such as Councils and community groups on their role. This advice would include mechanisms to become involved in a way that protects the Council's and its community's interests and complies with the Local Government Act or other legislation
- involves Local Government in decision making and implementation

The background to this support is discussed further throughout this submission

Financial Implications

The attachment provides an overview of the Council's waste and litter management profile and financial impacts of packaging waste on waste and litter management services.

In 2012/2013 it is projected that the costs of packaging waste on the Council's recycling, garbage and litter management services with respect to beverage and container type packaging waste and plastics, is as follows:

- \$820,000 for recycling and garbage collection services
- \$493,000 on litter management services

When paper and cardboard, confectionary and plastic packaging waste are included, this rises to the following:

- \$1.5 million for recycling and garbage collection services
- \$921,000 for litter management services

The Council will continue to provide waste and litter management services and forecasts 2012/2013 expenditure on these services being over \$10.2 million. However the responsibility for resource recovery of packaging materials must be shared among manufactures, importers and suppliers and the financial burden on local government eased for current and future systems and services that manage packaging waste.

Types of packaging waste to be considered

Packaging waste collected by the Council is not limited to beverage containers. Beverage containers make up 12 per cent of loose on ground litter and 14 per cent of litter collected in litter bins. Other types of packaging waste that is collected includes but is not limited to cardboard boxes, laundry and bathroom containers, steel cans and food containers or trays all considered packaging waste. Therefore initiatives must consider all types of packaging waste.

Packaging design and recycling systems

Packaging design that avoids and reduces waste, increases recyclability in the kerbside collection system or other system and the increases marketability of the recycled end product are important factors when determining the desired approach. The range of packaging materials that are collected by the Council include glass bottles and jars whether broken or unbroken, PET, HDPE, PVC, aluminium cans and foil, steel cans, paper and cardboard, and liquid paper board.

Increasingly light weight film or soft plastics and foam food trays are being observed by Councils in their kerbside recycling services. Lightweight packaging design aims to reduce transport cost and reduce use of other resources or the creation of emissions. These packaging products are not recyclable in the Council's recycling system.

Service providers working with Councils, continue to innovate creating new processes that can recycle more products where it is cost effective to do so and markets are viable. However, due to the small amount of light weight film or soft plastics and foam, the variability in the products, the limiting technology to separate and recycle these products, the infrastructure already invested to recycle standard kerbside recyclables, and the investment required of recyclers to recycle more products these light weight film or

soft plastics and foams end up in landfill and at a higher cost to local government. Therefore packaging design needs to have a realistic full life cycle assessment and take into account current recyclability within current kerbside collection systems or investment by packaging manufacturers, importers and suppliers into new recycling systems.

Technology improvements in the types of recyclables that can be recycled through kerbside recycling or other systems need to be developed over time to account for changes in product design.

Implementation guidance for local government

Government Initiatives need to provide guidance and tools for stakeholders not responsible for packaging waste such as Councils and community groups on their role. This advice would include mechanisms to become involved in a way that protects the Council's and its community's interests and complies with the Local Government Act or other legislation. It would also involve Local Government in decision making and implementation. A recent example where Local Government could have been provided more guidance on is the impending National Television and Computer Recycling Scheme (the Scheme). This example is provided should co-regulatory option for packaging waste be the outcome.

One of the issues of the Scheme is that it does not provide guidance or provide a forum for liaison with local governments on what to consider in a partnership with an arrangement administrator. Arrangement administrators seek contracted partnerships with councils under their terms. The preferred option and one governed by the Local Government Act and the Council's Purchasing Policies is for councils to test the market and contract with arrangement administrators under the Council's terms that protect the Council's and its community's interests. The Council has developed a draft contract for the collection and/or drop off of electronic waste to trial in 2012 and will encourage arrangement administrators to quote..

Therefore the Scheme would benefit from a fact sheet of key considerations when dealing with arrangement administrator or a template contract for local government to use when approached by arrangement administrators to conduct partnership services. A fact sheet and template contract would reduce duplication, wasted time and resources and improve local government understanding of their roles, responsibilities and key considerations when dealing with arrangement administrators. . If the preferred option for packaging waste is a co regulatory framework it would benefit from a similar approach. And local government should be involved in developing these tools.

Conclusion

This submission has discussed key observations and concerns of the Council and facts about the Council's waste and litter profile relevant to packaging waste. A future approach must consider all packaging materials and design, it must reduce the financial burden on local government and provide for a shared responsibility of manufacturers, importers and suppliers.

Primarily the Council is supportive of the initiatives to reduce packaging waste to landfill, increase recycling and reduce packaging waste littering and appreciates the opportunity to make a submission to the Packaging Impacts Consultation RIS.

The Council is keen to work with other councils, the Metropolitan Waste Management Group, and State and Federal Governments to establish coordinated approaches to address packaging waste.