



18 December 2015

Draft Metropolitan Implementation Plan Submissions
C-/ Metropolitan Waste and Resource Recovery Group
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Ask for: Kathleen McClusky
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Our Ref: A2269808; A2278319

Dear Sir/Madam,

Response to Draft Metropolitan Waste and Resource Recovery Plan

Council welcomes the opportunity to provide feedback in response to the Draft Metropolitan Waste and Resource Recovery Implementation Plan released for public consultation in November 2015. Attached to this letter is a response to the ten priority areas identified in the draft plan.

In addition, you may be aware in December 2012, the Environment Protection Authority (EPA) released publication 1490 titled 'Closed Landfill Guidelines'. The EPA has subsequently undertaken a state-wide programme issuing pollution abatement notices to predominantly Local Councils in relation to closed landfills across Victoria. In 2014 this involved EPA issuing notices to Hobsons Bay City Council for the closed landfill located on unreserved Crown land at Queen Street, Altona (Altona Landfill).

Council has been in discussions with the EPA and the Department of Environment, Land, Water and Planning (Department) regarding the ongoing management and aftercare of the landfill. The landfill was operated by the former City of Altona and subsequently Council, up to the late 1990s. Council subsequently rehabilitated the landfill and terminated its occupation of the site.

Prior to rehabilitation and termination of occupancy, the EPA issued two notices to Council dated 23 February 1999 and 21 December 2001. Council has written to the EPA seeking confirmation that the Notices have been revoked or, alternatively, that notices of revocation be issued pursuant to section 60B of the *Environment Protection Act 1970*.

On 28 October 2014 the EPA issued a notice of revocation for Pollution Abatement Notice 90003470, issued to Council on 12 May 2014 in relation to the Altona landfill. In the EPA observations recorded in the notice of revocation, the EPA records that the Department confirmed that the Altona landfill is located on unreserved coastal Crown land.

The Draft Implementation Plan includes, at table 23 in the final row on page 91, an assertion that the Altona landfill is subject to a post-closure pollution abatement notice and that Council is the duty holder. Council requests that table 23 be amended to delete Council as the duty holder. If required further information on this matter can be provided.

If you would like to discuss this submission further, please contact Kathleen McClusky, Manager Strategy and Advocacy on 9932 1004 or email kmcclusky@hobsonsabay.vic.gov.au.

Yours sincerely,



Natalie Walker
Director Strategic Development



Draft Metropolitan Waste and Resource Recovery Implementation Plan

Overall the draft Metropolitan Waste and Resource Recovery Implementation Plan (the draft Plan) provides more clarity on the metropolitan priorities as they relate to the strategic direction of various Victorian Government policies, plans and strategies. As with the Metropolitan Waste and Resource Recovery Group (MWRRG), Council's focus is also on diverting organics away from landfill. In Council's Waste and Litter Management Plan 2012-17 food waste is highlighted as a key issue to address.

Council also supports avoiding waste but acknowledges that waste avoidance is out of the scope of the draft Plan (page 12) and it will be addressed in the Victorian Government's *Statewide Community and Business Waste Education Strategy*. The draft Plan states that communities are concerned by increasing volumes of food waste, packaging, furniture, electrical goods and construction and demolition waste that end up in landfills. Communities want manufacturers to be made more accountable for goods they produce that ultimately get disposed at landfill at the end of their useful life. Council urges the Victorian Government to respond accordingly in its strategic and regulatory work and programs to reduce waste and ensure producers act. For completeness of a response to community concern on this matter, the draft Plan should also acknowledge work by the Victorian Government in this field.

Council agrees that by moving the metropolitan region towards greater resource recovery it will not only mean less waste to landfill and more reuse of resources, but that it can create new industries and jobs, grow the economy, and protect the health of communities. Council agrees that a different response is required to avoid having to need two large new landfills. Involving the community and stakeholders in waste and resource recovery decision making and protecting communities from the impact of waste and resource recovery activities is very important.

Council has provided a response on each of the ten priority areas as identified in the draft Plan. In its response, Council has highlighted sections of the draft Plan to ensure the appropriate context for its response and highlight issues of importance to Hobsons Bay.

Strategic priorities identified in the draft Plan of significant importance to Hobsons Bay, not in any particular order of importance, include the following:

- Strategic 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
- Strategic Priority 2: Build the metropolitan organics processing network and maximise the network's productivity by accepting household and commercial food waste
- Strategic 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
- Strategic Priority 4: Develop planning policies and tools that facilitate resource recovery targeting the protection of buffer separation distances for waste and resource recovery facilities and provisions for recycling in multi-unit developments
- Strategic Priority 9: Community and stakeholders are engaged in waste and resource recovery decision making



Key concerns that Council has with the draft Plan, that are described further in the submission include the following:

- what appears the intent of the MWRRG to forge ahead and prescribe that universal green waste systems and transitioning food waste into green waste collection systems (page 27) as the most viable option without the appropriate analysis and business case development
- the importance of making good decisions through research and business case development
- the closure of the south east landfill catchment within the next fifteen years and the effect on transport and local communities in the west and north if landfill alternatives are not implemented in the south east
- the long time frame for actions and the importance to plan and act early
- ensuring that the community is actively engaged in decision making with particular reference to siting and operations of waste and resource recovery facilities
- funding priorities of the draft Plan and investment support to local government and industry to enable a response

Council acknowledges that the Environment Protection Act requires that:

- councils must perform waste management functions which are consistent with the Regional Implementation Plans applying to the council's municipal district
- any person involved in the generation, management or transport of waste within a waste and resource recovery region must not do anything in relation to the waste that is inconsistent with the relevant Regional Implementation Plans

Therefore it is important the draft Plan sets the right and clear direction, and is appropriately resourced to support local government and any person involved in the generation, management or transport of waste within the Metropolitan region to achieve these priorities. This includes funding, research and guidance. The Sustainability Fund provides opportunity to support the MWRRG, local government and industry to invest in change for the better.

Council understands that short term means five to 10 years, medium 10 to 20 years and long term 20 plus years. Clarity early on in the draft Plan with respect to timeframe definitions is important for local government to understand and plan its strategic and operational activities within and to perform waste management functions which are consistent with the Regional Implementation Plans applying to the council's municipal district.

Strategic 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

and

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

Council acknowledges that the composition of municipal solid waste (MSW) and commercial and industrial (C&I) waste comprises a significant portion of recoverable materials that are



being disposed to landfill including food waste (35%), plastics (15%), paper/cardboard (10%) and green waste (7%) (page 26). Most waste that is recovered includes aggregate, masonry and soils (50%), metals (18.1%) and paper and cardboard (17.1%) (page 25). Only 0.1 per cent of food waste is recovered for reprocessing (page 25). Therefore this provides significant opportunity to reduce the reliance on landfills, reduce the production of odorous gases and methane which have a global warming potential of 25 times greater than carbon and reduces the risk of leachate entering groundwater and waterways if not contained.

Over the next ten years Melbourne's landfill market will make a major transition, with the south east landfill catchment breaking down as landfills in the Kingston area close. The Victorian Government's goal is that landfills only receive treated, residual waste (page 47).

The draft Plan states that Melbourne has adequate landfilling capacity for both the short to long term within existing metropolitan landfills that have potential to operate beyond 2026 (page 89) and there is adequate supply of landfill space in the north west that could meet Melbourne's overall needs in the long term (page 50). The draft Plan states that if we do not act to establish residual waste treatment plants and build the organic processing network, then by 2042 Melbourne will need to landfill 1.15 million tonnes more than we do today. This could mean that by 2042 Melbourne would need two new landfills, each around the size of the Werribee Landfill, in addition to existing metropolitan landfills that have potential to operate beyond the ten years of this infrastructure schedule (page 89).

The MWRRG expect that priority action 1 (Minimising councils' reliance on landfills through group procurement of residual waste collection and processing) and priority action 2 (delivering the metropolitan organics processing network) are expected to have the biggest impact on reducing Melbourne's need for more landfills (page 88). If priority actions 1 and 2 are delivered, then it is likely that the amount of waste we send to landfill in 2042 will be similar to the amount that was landfilled in 2014. While this removes the need to schedule new landfills, existing landfills that have potential to operate beyond 2026 would still be required (page 89).

The Draft Implementation Plan includes, at table 23 in the final row on page 91, an assertion that the Altona landfill is subject to a post-closure pollution abatement notice and that Council is the duty holder.

We request that table 23 be amended to delete Council as the duty holder. If you require further information on this matter Council is happy to provide this detail.

Council supports group procurement of residual waste processing that progressively increases the resource recovery rate over the contract duration and building the metropolitan organics processing network and maximising the network's productivity by accepting household and commercial food waste.

However, Council has some concern regarding the timing of these activities, the process by which decisions are made, the effect on western and northern communities as a consequence of the closure of the south east landfill catchment, funding innovation to reduce reliance on landfills and prescribing the collection of food waste being through green waste collection systems without proper consideration and business case development. These concerns are explained further with excerpts from the draft Plan.



With respect to residual waste, the draft Plan states that group procurement of residual waste treatment commences in 2025 and will focus on solutions for the south east metropolitan area. Until then by mid 2017 new resource recovery or transfer stations are required to consolidate and transport waste from the south east region for disposal at available landfills. The MWRRG will also complete by 2016 a resource recovery and transfer station growth strategy for residential and commercial drop off services across metropolitan Melbourne to determine the needs and priorities of the broader region (page 82).

Additional landfills and expansion of existing landfills in the north west to accommodate waste from the south east is unacceptable by local communities. Council understands that the Victorian Government must balance the waste disposal needs of metropolitan Melbourne and landfills have a role to manage this waste now. However, even if there is capacity within north west landfills and adequate transport capacity in the principal freight network (page 53) which Council is not confident on, bulk hauling to the north west is not an optimal, short, medium to long term solution. In addition to this approach being unacceptable to the community it has implications for greenhouse emissions increases as a result of increased transporting of waste. Council requests that MWRRG modelling be provided to local government and if not already, include the increase in population and economic development be factored into the equation to ensure that this is the case.

Council understands that alternative treatment solutions take significant time to plan and implement and may result in a cost to communities. Council urges the Victorian Government and MWRRG to act now for solutions to mitigate the effect on western and northern communities as a consequence of the closure of the south east landfill catchment. Council also urges the Victorian Government to invest financially in solutions by assisting innovation and advancement and reduce the reliance on landfill by MWRRG, local government and industry including seed or grant funding or no interest or low interest loans from the Sustainability Fund.

In addition, while Council respects that the south east catchment is in need of a more urgent response, it reiterates the Metropolitan Local Governments' Waste Forums' response to the 2013 draft Metropolitan Waste and Resource Recovery Strategic Plan in that activities in the south east should not be at the detriment of innovation in the north or west. North west councils are keen to innovate and reduce the cost and environmental and social impacts of landfilling on their own communities. Therefore north west councils should also be supported through advice and guidance as well as funding assistance.

The MWRRG currently manages five municipal landfill service contracts on behalf of 26 councils. These contracts account for about one million tonnes of landfilled waste annually. The contracts collectively expire on 31 March 2021, providing the opportunity to go to market and make available the secure, large volumes of waste needed to underpin industry investment in resource recovery alternatives (page 17). Council has two options for disposal of waste from its garbage collection service that it provides its community. These include the Werribee Landfill and MRL Truganina landfill. Council's primary site is the Werribee Landfill.

It is understood from the MWRRG's consultation events on this draft Plan that the MWRRG will explore group procurement of residual waste treatment through tendering for landfill disposal services of which the process will commence in 2016-17. Tendering would be



planned for 2018-19 with an outlook for commencement of new landfill disposal contracts and possible alternatives to landfill in 2021. The draft Plan states that in the medium term the MWRRG will investigate the opportunity for a residual treatment facility for councils unable to provide a separate organics collection service within initial planning to commence in 2016 (page 41). Council supports this process of exploring alternatives to landfill thus reducing the reliance on them. Council is interested in being involved in solutions to treat residual waste from garbage bins and litter bins and would consider for example partnering with Port Phillip, Yarra and Melbourne City Council's or other councils in such a solution.

It is important that business cases for group procurement of residual waste processing are completed well in advance of the need. This supports the MWRRG and Victorian Government objective to support "well informed evidence based decisions" (page 14). A business case could be informed through a repeated market assessment later down the track or through an expression of interest process.

At a local government level, household waste comprises the largest portion of residential waste collected. Council's waste collection contracts expire on 30 June 2020. As the expiry of Council's garbage, recycling and garden waste collection contract and the metropolitan municipal landfill service contracts are within eight months of each other, this should mean that any changes that may result from resource recovery tenders are factored into Council's waste collection tender.

There is also an opportunity that waste from litter bins, street sweepings and seaweed be incorporated in this business case and group procurement.

The North West Organics project took five years to seek involvement from 11 councils, develop tender documentation, tender, evaluate, appoint and commission. The existing landfill contracts expire on 31 March 2021. Therefore it would be critical that the MWRRG procurement team engage councils early to seek involvement and develop the tender documentation for residual waste treatment. Developing a tender initiation and evaluation plan with councils would be essential to the MWRRG and councils to establish a clear direction, timeframe and scope of such significant group procurement initiatives.

Council supports addressing food waste resource recovery but highlights some concerns over the particulars of this strategic direction, the process and the timeframe for implementation.

Council has concern mainly with what appears the intent of the MWRRG to forge ahead and prescribe that universal green waste systems and transitioning food waste into green waste collection systems (page 27) is the most viable option without the appropriate research and business case development.

As mentioned previously Council recently considered food waste resource recovery opportunities in Hobsons Bay. Council concluded that options will require investment into bin and processing infrastructure and community education. Also that food waste recovery activities are not likely to be met individually by Council and will require partnerships with other organisations and/or councils. Activities will also require leadership and the right policy and economic framework from the Victorian Government, investment from the private sector and procurement management by the MWRRG.



Because of the varied success of food waste collections in green waste systems, the cost and the limited options or information, there is also a great degree of uncertainty as to the best approach that local government should adopt to recover food waste. It is important that Council continuously review opportunities for improvement but also that it makes informed decisions that consider the financial, environmental and social implications and opportunities of initiatives to ensure success and a benefit to the community and Council in doing so. Food waste recovery initiatives are a long term commitment therefore good decision making is essential.

The Victorian Organics Strategy outlines three key actions to be completed within the next five years that supports good decision making. These are as follows:

- prepare a guide to organics waste collection services
- undertake economic modelling to consider options for organic waste management
- produce procurement guidelines that consider the supply chain, transport systems, processing and treatment options and end market uses

Council therefore encourages the MWRRG to consider this work in light of its procurement activities and direction with food waste recovery. Completing a business case prior to procurement activities would support the MWRRG and Victorian Government objective to support "well informed evidence based decisions" (page 14).

With respect to organics processing infrastructure, the MWRRG propose to focus on priority actions in the next three years that can divert organics from landfill (page 89). The draft Plan states that group procurement of the first stage of infrastructure for south east metropolitan region will be completed by April 2016 and then the second in September 2017. In the eastern region new infrastructure at a new site will be completed by the end of 2016. The second site within the North West organics contract will be completed by 2017 at Werribee (page 82).

Another concern is that the draft Plan states that there is currently limited capacity for MSW food waste and commercial organic waste (page 38). Council agrees with this notion in that the current metropolitan Melbourne organics system is limited to the north west organics plant with procurement activities underway in the south east and east region.

Veolia Environmental's (Veolia) North West Organics Processing plant in Bulla is the largest and most technological advanced organics facility that 11 councils including Hobsons Bay are contracted for 15 years. The process is a composting operation in a fully enclosed plant and can accommodate food waste. The facility is capable of processing 85,000 tonnes of organic waste a year. Veolia has also established a garden organics transfer station at Wyndham City Council's Refuse Disposal Facility (RDF) in Werribee. The Werribee site will be developed into a second composting facility in 2016 capable of processing a further 35,000 tonnes of garden waste per year. Veolia's Bulla composting facility officially opened on 10 October 2013. Council began transporting its garden waste to the Werribee Organics transfer station in February 2014. When both facilities are fully operational, Veolia will be able to process 120,000 tonnes of organic waste a year. This leaves little room to move with respect to processing food waste through this system and through a green waste collection



service as suggested in the draft Plan. More or expanded existing organics processing facilities will be required.

Council's limited experience of group procurement of waste collection services suggests that group procurement of waste collection services does not necessarily achieve economies of scale or may be unsuitable for some councils rather than other due to local or contractual conditions. Also other factors such as financial sustainability of a service provider, their experience, and risk management systems and quality of service may also be important to a council. However Council is interested in being involved in exploring opportunities for group procurement of waste collection services.

Strategic 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***

and

Strategic 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***

Council supports the development of planning policies and tools to facilitate resource recovery especially those targeting the protection of buffer distances for waste and resource recovery facilities, protecting communities and the environment and provisions in multi-unit and mixed developments.

Council agrees that planning for waste and resource recovery infrastructure is inherently linked with land use planning. As the population grows there is a need to secure more housing, essential community infrastructure and services, and transport. A key challenge for land use planning is to balance these competing needs and interests so that an overall community benefit can be achieved by developing land in a fair, orderly, economic and sustainable way (page 56). Local government is challenged with ensuring services are delivered to a high standard and at a reasonable price. The further away landfills or waste and resource recovery facilities are located, the more costly it becomes.

Council does not own or operate waste and resource recovery facilities. Council has an interest in ensuring that the facilities it uses to service its community with waste and litter management services are protected from encroachment by incompatible land uses. These currently include Wyndham City Council's landfill in Werribee, SKM Recycling Materials Recovery Facility in Coolaroo and a transfer station in Laverton North, Calleja Transfer Station in Altona North and Veolia's organics processing facility in Bulla and its organics transfer station in Werribee. The Transpacific Industries Melbourne Regional Landfill in Truganina is also a site that Council has access to but does not currently use.



Within Hobsons Bay or near its boundaries there are waste and resource recovery facilities that service metropolitan Melbourne that the draft Plan proposes to form part of the infrastructure schedule (pages 76 to 81) and therefore be retained as waste and resource recovery facilities. Council has assumed that these facilities will also aim to be protected by buffer separation distances. These facilities provide to a varying degree local economic development and employment opportunities for communities.

Two resource recovery sites of current significance for Hobsons Bay that are missing from the infrastructure schedule are SKM Recycling's Materials Recycling Facility in Laverton North and Veolia's organics transfer facility in Werribee.

Within Hobsons Bay or near its boundaries there are landfills that service metropolitan Melbourne that the draft Plan proposes to form part of the infrastructure schedule (pages 83 to 85) and therefore be retained as landfills until the likely closure date.

As previously mentioned, additional landfills and expansion of existing landfills in the north west to accommodate waste from the south east is unacceptable by local communities. Council understands that the Victorian Government must balance the waste disposal needs of metropolitan Melbourne and landfills have a role to manage this waste now. However, even if there is capacity within north west landfills and adequate transport capacity in the principal freight network (page 53) bulk hauling to the north west is not an optimal, short, medium to long term solution.

As previously mentioned, Council understands that alternative treatment solutions take significant time to plan and implement and may result in a cost to communities. Council urges the Victorian Government and MWRRG to act now for solutions to mitigate the effect on western and northern communities as a consequence of the closure of the south east landfill catchment.

These waste and resource recovery facilities and landfills are part of local hubs defined in the draft Plan. The State Wide Waste and Resource Recovery Infrastructure Plan define a waste and resource recovery hub as a facility or group of facilities that manage or recover waste or materials. An ideal hub has appropriate buffers between the waste and resource recovery facilities and incompatible uses to support the activities undertaken at that location. It has well established feeder-spokes and good access to transport networks. It is co-located or in close proximity to complementary activities that provide feedstocks or markets for the products and services, or share and utilise the same buffers. It is economically viable, minimises community, environment and public health impacts and contributes to the local and state economy (page 61). The Victorian Government have emphasised the importance of community engagement around hubs, recognising that community acceptance underpins the ongoing viability of facilities. Sustainability Victoria will soon release its Statewide Education Strategy which will support the process of engaging the community and building community trust, or what is referred to as the 'social licence to operate' around waste and resource recovery facilities (page 61).

Hubs that have been identified in the draft Plan in and around Hobsons Bay include the Brooklyn precinct, Werribee Landfill, Deer Park precinct, Laverton Precinct, and Owens Illinois in Spotswood. Hubs of significance with respect to waste and recycling services provided to the community include the Werribee landfill, Deer Park precinct, SKM Materials



Recovery Facility, Coolaroo and Veolia Organics, Bulla. Engaging with the communities around these sites and making appropriate landuse planning decisions is critical.

Of particular note is that Owens Illinois's glass reprocessing facility is the only major facility servicing Victoria.

With respect to the Brooklyn Precinct, odour, dust and noise are local issues of concern for residents living in Brooklyn, Altona North, Laverton, South Kingsville and Newport. The predominant source of these issues has come from the Brooklyn Industrial Estate, commonly referred to as the 'Brooklyn Triangle' which is a parcel of land situated in the City of Brimbank, bordering the City of Hobsons Bay and the City of Maribyrnong. There are approximately sixty businesses operating in the Brooklyn Triangle which include: quarrying, shipping container yards, demolition yards, recycling depots, transport logistics, abattoirs, tallow producers and hide processors.

Based on fixed air pollution monitors, the Brooklyn area demonstrates a high particulate matter level. This has been the case for many years, especially in high winds. In response to these issues and in an attempt to create some sustainable change, for at least ten years the local communities of Hobsons Bay have raised amenity issues with the EPA and industries operating in the Brooklyn Triangle via the Brooklyn Community Reference Group (BCRG).

While the BCRG receives resourcing from the EPA, Council is concerned that despite the best efforts from all concerned, dust, odour and noise issues continue to adversely impact upon residents in Brooklyn, Altona North, Laverton, South Kingsville and Newport. Council seeks stronger involvement of the EPA in community engagement, data collection, enforcement activities, and the implementation of strategies to reduce odour, dust and noise impacting the health and wellbeing of residents. In addition Council would like to see stronger partnerships across Victorian Government departments including Department of Health and Human Services, Department of Economic Development, Jobs, Transport and Resources, and Department of Environment, Land, Water and Planning.

Council also has the responsibility to ensure that sound land use planning decisions are made regarding waste and resource recovery facilities, past, present and future.

Existing and any new landfills must be designed, constructed, operated and rehabilitated using best practices set out in the *Best Practice Environmental Management (Siting, Design, Operation and Rehabilitation of Landfills) 2010 updated* (Landfill BPEM). For landfills receiving putrescible material that decomposes, best practice rehabilitation and aftercare can extend to 30 years or more after a landfill stops receiving waste (page 47). Council must have consideration for these guidelines when making landuse decisions about past landfilling sites.

Planning around potential landfill gas sites is a particular concern for Council. Council is investigating historical landfill sites within the municipality before establishing a policy to assess land use applications which may be affected by these sites. There is limited policy framework or statutory process to support policy creation for this issue. To assist with this, Council will look to the EPA for support and to recommend tools to assist Council in dealing with these issues. In addition, Council would request assistance from the EPA to provide any information it has to assist with determining places of potential contamination and landfill gas



concerns. In the future, Council would hope that the EPA would lobby the Victorian Government to bring these tools into the legislative framework.

Site contamination including from past land filling uses, requires greater up front consideration in the planning framework. Currently, the Environmental Audit Overlay (EAO) requires a statement or certificate of environmental audit be issued prior to a sensitive use taking place. The EAO is traditionally applied when dealing with contaminated land and is not necessarily applied to land where groundwater or land fill gas issues have arisen from adjoining site

Encroachment of competing land uses such as residential onto landfill is a significant issue for councils and landfill operators. The MWRRG will deliver the Local Government Buffer Support Program over four years (2014-17) in collaboration with local government, and key State Government agencies. This program aims to support local government to respond to land use planning challenges and opportunities and develop land use planning policies, tools and controls to define, protect and maintain buffers to waste and resource recovery facilities that will ultimately become part of the Victorian Planning Provisions. It is important that this program continues to maintain State Government Support to ensure meaningful planning tools are incorporated as part of the Planning Scheme.

The draft Plan states that local planning policies should clearly support waste and resource recovery hubs identified in the draft Plan and current and proposed infrastructure identified in the metropolitan infrastructure schedule (page 59). Clause 19.03-5 of the Victorian Planning Policy sets out requirements for these considerations.

Greater input from the EPA in land use planning is critical. The EPA has the knowledge and expertise to make informed decisions in relation to contaminated land, landfill BPEM, ground water contamination, buffer requirements and amenity issues.

Council officers are actively contributing to the MWRRG multi-unit development project and are looking forward to planning policies and tools being implemented at a metropolitan and Victorian level.

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

Council supports the MWRRG exploring small, onsite processing infrastructure for businesses and precincts that produce large volumes of waste including food waste on the condition that appropriate planning and EPA works approval processes are complied with and the impact on the community is mitigated. This could be of particular interest for companies in Hobsons Bay, where food product manufacturing is an important component of the local economy, contributing \$463m to economic output and supporting close to 1,000 jobs.



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

Council supports the development of a Transfer Station Growth Strategy. As the population grows and landfills close and consolidate particularly in the south east region, so too does the reliance on the transfer station network to manage the increase in waste.

Hobsons Bay has limited accessible drop off centres for householders, therefore Council requests reasonable consideration of access to such facilities or event based services (such as electronic waste recycling or household chemical collection events) connected to these facilities in the growth strategy. Council also encourages community engagement in this process to ensure that transfers stations have the 'social license' to operate. Social license is the communities' acceptance, level of trust and mutual understanding between the operators and the community potentially affected by their operations.

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

As outlined in Strategic Priority 5, food product manufacturing is an important component of the local economy. This provides significant scope within Hobsons Bay to establish relationships between commercial food waste generators and organics processors. However, a clear compliance framework should be put in place to ensure these operators do not affect the amenity of the area, including transportation and unloading of waste from commercial food generators and to organics processors. Enforcement and monitoring should not fall upon local government to resource.

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

Council supports maximising recovery of products including food waste, electronic waste and flexible packaging. It is also essential that efforts are invested to avoid waste through working with residents, business, industry and manufacturers. Council would like to see more focus on avoidance in the draft Plan and Victorian Government strategic objectives and initiatives.

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

Council supports engaging stakeholders and community in waste and resource recovery decision making. It is important that industry, Victorian Government agencies and councils are actively involved in the process and contribute. It is critical that the community understands the importance for waste and resource recovery infrastructure and the changing nature of how we propose to manage waste and recycling into the future. That decisions aim to protect communities and the environment and issues like those experienced by Brooklyn, Altona North, Laverton, South Kingsville, Newport and neighbouring communities are mitigated.



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

Council supports a Victorian approach to educating the community about recycling but would also like to see a focus on waste avoidance.

The draft Plan states increasing the quality and quantity of recovered materials could be achieved through implementing metropolitan-wide education campaigns as well as providing ongoing localised household engagement programs (page 27). It is also essential that resourcing be placed into investigating avoiding waste from residents and businesses. Council would like to see more focus on avoidance in the draft Plan and Victorian Government strategic objectives and initiatives. Dedicated business training focused on waste avoidance as well as resource and process efficiency would support this objective.

Other comments about the draft Metropolitan Waste and Resource Recovery Implementation Plan

The draft Plan states increasing the quality and quantity of recovered materials could be achieved through

- providing households with a larger 360 litre commingled recyclable bin (where appropriate) at the time of a council's kerbside contract renewal (page 27)
- councils adopting the Australian Standard for Mobile Waste Containers (AS4123) at the time of kerbside contract renewal to create a metropolitan wide uniform standard for bin lid colours to support standard education and messaging around the use of bins (page 27)

Council's recyclables and garden waste bin lids are consistent with the Australian Standard. Garbage bins however are not consistent and have a dark green lid rather than the standardised red bin lid colour. Council's Waste and Litter Management Plan 2012-17 highlighted that the MWRRG was seeking Victorian Government financial support through reinvestment of the landfill levy and recommended assessing bin colour standardisation activities at a metropolitan level as the need arises. The majority of Council's garbage bins are more than 15 years old. Replacing lids on old bins or replacing whole bins would have to be evaluated with respect to the social, environmental and financial implications compared to investment in other waste and litter initiatives or priorities.

Council's Waste and Litter Management Plan 2012-17 highlighted that implementing a smaller garbage bin and larger recycling bin collection system was an alternative to reduce the amount of garbage generated and increase recycling. The Council intends to research and develop an options and issues paper on these opportunities.