



## COVER SHEET FOR SUBMISSIONS

### *Updating the 2009 National Waste Policy: Less waste, more resources*

#### Overview

Feedback is invited on the discussion paper: *Updating the 2009 National Waste Policy: Less waste, more resources*. Submissions should be provided by 5pm (AEST), Friday 5 October 2018.

#### Contact details

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5 October 2018

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To whom it may concern,

**Submission to the discussion paper on the update of the 2009 National Waste Policy**

I am writing in response to the discussion paper on the update of the 2009 National Waste Policy: Less waste, more resources.

Council appreciates the opportunity to provide a submission and looks forward to hearing from the Australian Government on how all feedback has been included in an updated policy.

Attached is Council's response to the proposed targets and strategies raised in the discussion paper to address the following principles:

- avoid waste
- improve resource recovery
- increase the use of recycled materials and build demand and markets for recycled products
- better manage material flows to benefit human health, the environment and economy
- improve information to support innovation, guide investment and enable informed consumer decisions

If you would like to discuss this submission further please contact Bill Millard, Director Strategic Development on 9932 1096 or email [bmillard@hobsonsbay.vic.gov.au](mailto:bmillard@hobsonsbay.vic.gov.au).

Yours sincerely,

Tammi Rose  
**Acting Chief Executive Officer**



## **Submission to the discussion paper on the update of the 2009 National Waste Policy: Less waste, more resources**

Hobsons Bay City Council is situated on Port Phillip Bay, approximately between six and 20 kilometres south west of Melbourne's central business district. It covers an area of approximately 66 square kilometres. Hobsons Bay has more than 20 kilometres of bay frontage, quality residential areas, large expanses of environmentally significant open space and a range of major industrial complexes, which contribute significantly to the economy of Victoria. These features contribute to the City's culture, which is strongly linked to its maritime heritage, environment, industry and lifestyle. It is home to approximately 93,392 residents.

Council provides a breadth of municipal solid waste and resource recovery services and community engagement activities. These include weekly garbage and fortnightly recycling and garden waste collections and an at call hard waste collection service. Council supports Sustainability Victoria's Detox Your Home household chemical collection program and provides a lighting recycling program. Council also provides an annual electronic waste recycling event in partnership with an approved arrangement under the National Television and Computer Recycling Scheme.

Like the Australian Government, our community would like to see a rapid shift away from the 'take, make, use and dispose' approach and a movement towards designing systems and products to avoid waste, conserve resources and maximise the value of all materials used. A whole-of-system approach is required, including accounting for the full cost and life-cycle of materials.

The discussion paper includes proposed national targets, strategies and milestones. Overall, further direction and detail on specific actions is required, investment and responsibility which will be of particular interest to local government and the communities they represent. It is acknowledged that the updated National Waste Policy will require the preparation of action plans by 2020 to determine and address priorities, including landfill levies, research and development, regulatory and legislative incentives, financial measures and national energy from waste responses. Clarification from the Australian Government is sought on what strategies and actions within the 2009 National Waste Policy will be retained, reframed or abandoned.

A response to the principles and the proposed targets and strategies raised in the discussion paper are summarised below:

### *Principle 1: Avoiding Waste*

A waste avoidance target at a national level is supported primarily because the sphere of influence at this level is greater in terms of regulatory influences on the economy, export and production specifically through product stewardship principles. State and Territory Governments also have an influence on avoidance. Local government has a lesser influence on waste avoidance but seem to be the most active in addressing behavioural change.



The proposed target of 10 per cent reduction in total waste generated in Australia per capita by 2030 is ambitious. This is given the fact that over 10 years the amount of waste generated per capita has declined on average by 0.3 per cent per year and the population is increasing.

The basis for establishing any targets should be sound. The Victorian Government came under scrutiny by the Victorian Auditor General for targets set in the Victorian Towards Zero Waste Strategy. Lessons could be learnt by from this Auditor General review. In addition, the waste avoidance target should also consider the National Food Waste Strategy which aims to reduce Australia's food waste by 50 per cent by 2030.

Separate appropriate targets for municipal solid waste, commercial and industrial waste, and construction and demolition waste would be beneficial given that each sector has varied current or future systems or practices of achieving these targets. A per capita waste generation target for municipal solid waste could put onus on individuals and organisations to reduce consumption.

A per capita waste generation target may not be suitable for commercial and industrial waste, and construction and demolition waste. A target that represents a comparable business type, size or value may be more suitable but may be difficult to quantify and be too onerous to measure and report on.

Strategies that address food waste avoidance are supported. The strategy for businesses across the food supply and consumption chain to become signatories to the voluntary commitment program to reduce food waste by 2019 is ambitious. A firmer commitment is required, through compulsory or co-regulatory product stewardship frameworks, from those food supply and consumption businesses that produce a greater level of food waste than others. Attention should also be given to international suppliers of food to ensure a level playing field for local businesses.

Strategies that address the design of products to avoid waste, conserve resources and maximise the value of all materials is also supported. But again a firmer commitment is required through compulsory or co-regulatory product stewardship frameworks, from those businesses that produce products which have high levels of waste, a reduced viability to recover resources from the product and its packaging, high consumption rates and the use of virgin resources. The concept of incentivising the redesign, reuse, repair, resource recovery, recycling and remanufacturing of products is also supported and in addition it is recommended that clarity on the specifics of this incentive concept are provided to everyone. Attention should also be given to international suppliers of products and packaging to ensure there is a level playing field for local businesses.

Targeted consumer education strategies across Australia by 2021 to avoid waste and improve recycling is supported. However it is considered that a greater level of detail on the specific actions and financial continuation to this strategy is required. Local government in Victoria has a long history of advocating to State Government for increased investment in these activities but with limited success. More mainstream and ongoing promotional campaigns are required.



*Principle 2: Improving resource recovery*

Similarly with a waste avoidance target, the basis for establishing a resource recovery target should be sound. The Victorian Government came under scrutiny by the Victorian Auditor General for targets set in the Victorian Towards Zero Waste Strategy. Lessons could be learnt by from this Auditor General review.

Separate appropriate targets for municipal solid waste, commercial and industrial waste, and construction and demolition waste would be beneficial in that each sector has varied current or future resource recovery systems or practices of achieving these targets. A separate target for the commercial and industrial waste, and construction and demolition waste sectors would acknowledge these sectors current successes and higher recovery rates than Municipal Solid Waste (MSW).

From our own work in developing Council's draft Waste and Litter Management Strategy 2030 and factoring in a business case on the alternatives to landfill by the Metropolitan Waste and Resource Recovery Group, it is considered that an 80 per cent target for MSW resource recovery is ambitious. This work shows that by 2030 at least 67 per cent of Council's MSW would be diverted from landfill. This is based on assumptions that Council allowed food waste in its green waste bin system, with an 80 per cent participation rate and at least 25 per cent of food waste diverted from the garbage stream into this system). Also if Council entered into contracts for alternatives to landfill such as waste to energy options.

Clarity from the Victorian Government is also required if and how it plans to adopt these targets when they have their own particular strategic approaches.

The strategy around product stewardship (strategy 4) which talks about developing and implementing partnerships across government and business is not a strong commitment. A stronger commitment is required of product and packaging producers and the supply chain to avoid waste, and reuse, recycle or compost products. A shift away from the reliance on local government to be the end of pipe solution for products and packaging to be recycled, treated or disposed is also required. Products and packaging are evolving at such a rapid rate that our service providers waste and recycling systems find it difficult to adapt to as rapidly and for them to be viable systems to manage all types of products and packaging. Product producers should establish their own resource recovery systems or to proactively work in partnership with and support local government towards a solution if recycling, resource recovery and disposal through local government systems is assessed as the most viable method.

The commitment of State and Territory Ministers that 100 per cent of packaging designed be reusable, recyclable or compostable by 2025 is also ambitious. It will require firm commitments of packaging suppliers, product manufacturers and the overall supply chain. A voluntary arrangement will not be successful. It will require specific actions and obligations to be incorporated under the *Product Stewardship Act 2011* (the Act).

The discussion paper acknowledges the role of the Australian Government in ensuring our international obligations are met, providing effective national leadership and coordination, addressing national market failures and providing national data and reporting. The discussion paper also acknowledges that regulation and management of waste and resource recovery



within Australia is primarily the responsibility of State and Territory Governments. With respect to strategy 5 in the discussion paper, achieving a common approach to landfill levies and regulatory inconsistencies will be a challenging and lengthy process given they are the role of states and territories. Due to the infancy of waste to energy in Australia and the importance of the national energy sector in the response, it would be important for the Australian Government to focus on this area soon.

Strategy 7 is about improved recycling and energy recovery, to divert waste from landfill in addition to the implementation of the waste hierarchy. In Victoria the waste and resource recovery strategic framework supports this strategy and the interim milestones proposed. Given the significant investment of Victorian local governments in responding to these Victorian strategic frameworks over a number of years, varying them significantly to respond to national requirements should be avoided. The overall Victorian strategic directions are on the right path, however increased Victorian Government investment is essential to support local government to achieve the deliverables with respect to waste avoidance and waste and resource recovery. Specific investment in food waste recovery systems and alternative waste treatment technologies is required. An opportunity for the Australian Government is to prioritise their action towards waste avoidance and product stewardship. The importance of secure markets including a focus on local markets for materials produced from resource recovery and treatment of waste cannot be understated. Therefore prioritising action in this area would also be important for the Australian Government.

Strategy 7 also acknowledges the need to increase the capacity of the waste and recycling sector. Local government is under pressure to deliver more with less. Waste and resource recovery roles, responsibilities and service varies across local government and teams that deliver them have varying skills and capacity. There are networks for information sharing and capacity building however these focus on current issues or opportunities. The China National Sword Policy reform highlighted that there is a gap in research and information sharing of emerging issues that are likely to impact across the sector. The Australian and State and Territory Governments should have a stronger role in ongoing research into the threats and opportunities within the waste and resource recovery sector and communicating these to local government officers on a regular and ongoing basis. An ongoing standardised training program may also be beneficial.

*Principle 3: Increase use of recycled material and build demand and markets for recycled products*

Sustainable procurement practices and increasing the purchase of recycled materials by the public and private organisations is supported. A 30 per cent average recycled content across all goods and infrastructure procurement by 2030 is ambitious. It will require standardised and simple recording and reporting mechanisms to quantify these purchases. Therefore support to local government to implement these systems would be beneficial.

Standardised national product labelling indicating percentage of recycled content in packaging in place by 2020 is also supported. The standardised national product labelling should also indicate the recyclability of a product and in what systems it can be recycled. This is because there is significant variability in packaging and therefore significant confusion if the packaging can be recycled and where or how it can be recycled.



As previously mentioned, the importance of secure markets, including a focus on local markets, for materials produced from resource recovery and treatment of waste cannot be understated. Therefore prioritising action in this area is important for the Australian Government.

*Principle 4: Better manage material flows to benefit human health, the environment and economy*

The national target and strategies to phase out problematic and unnecessary plastics by 2030 is supported because of the effect that these types of products have on the environment and their reduced recyclability in local government waste and recycling systems. However the approach to achieve this lacks detail and problematic and unnecessary plastics must be defined.

Packaging has been included in the 2013-14 and 2014-15 Minister's Product Stewardship list. But was removed after a 2014 Packaging Impacts Regulation Impact Statement (RIS) process recommended that the Australian Packaging Covenant (APC) continue to be the principal national instrument to reduce the environmental impacts of consumer packaging in Australia. Given the renewed interest nationally in the effects of all types of packaging on the environment as an outcome of State, Territory and supermarket approaches to eliminating single use plastic bags and the effects of China's National Sword Policy, packaging should be placed back on the list in the near future for re-consideration. This re-consideration is supported by recommendations of the 2016 senate inquiry into the threat of marine plastic pollution packaging and the outcomes of the meeting on 27 April 2018 of Commonwealth and State and Territory Environment Ministers. The changes in the national recycling market as a result of China's National Sword Policy is likely to have changed the arguments for and against container deposit schemes and as such should be reviewed.

Establishing a national product stewardship scheme for batteries is supported.

The strategy of reducing the generation and landfill disposal of organic waste including food and garden waste is supported. It is acknowledged that this strategy is supported by the National Food Waste Strategy which aims to reduce Australia's food waste by 50 per cent by 2030. The proposed national target is to halve the volume of organic waste sent to landfill by 2030. These targets are subtly different in scope. Similarly with a waste avoidance and resource recovery targets, the basis for establishing a target for the reduction in organic waste sent to landfill should be sound.

From our own work in developing Council's draft Waste and Litter Management Strategy 2030, both the 50 per cent target for diversion of organic waste sent from landfill by 2030 and an 80 per cent target for MSW resource recovery is ambitious. If Council allowed food waste in its green waste bin system (with an 80 per cent participation rate and at least 25 per cent of food waste diverted from the garbage stream into this system), by 2030 at least 31 per cent of Council's MSW would be diverted from landfill. This is 10 per cent above 2017-18 levels.



Work is underway in Victoria to better manage organic material. Council's draft Waste and Litter Management Strategy 2030 proposed to implement a household food waste recovery service.

Increased Victorian Government investment is essential to support local government to achieve food waste avoidance and the diversion of organic waste sent from landfill.

*Principle 5: Improve information to support innovation, guide investment and enable informed consumer decisions*

Consistent and simple data and reporting is important. Annual data collection and reporting has focused on the historical data and performance, which is valuable information, however annual reporting and communication has failed to address emerging trends or issues. These are often picked up every so often in reviews of strategies and may be too late to address. The discussion paper suggests to investigate options for the production of infrastructure, trade and market information, including imported product and packaging information and material flows, by 2020. This is supported and when established should be undertaken on a regular basis.

Strategy 14 is that all Australian Governments and businesses generate and report information to support creating and maintaining markets for recycled materials, both domestically and internationally. This strategy lacks detail about the obligations of and resource implications on governments and businesses to collect and report this information. Local government already has a myriad of waste and resource recovery, customer satisfaction and value for money reporting obligations to a number of organisations. Consistency in data collection and reporting with minimal implications on local government resources will be important.