10 December 2019

Infrastructure Victoria
Chief Executive Officer
Michel Masson
enquiries@infrastructurevictoria.com.au

Dear Michel,

Re: Feedback to Recycling and Resource Recovery Infrastructure – Evidence Based Report

The City of Greater Bendigo welcomes the opportunity to provide a submission in response to Infrastructure Victoria’s recycling and resource recovery infrastructure evidence base report.

The City supports the overarching strategic objectives identified by IV with the advice to Government to ‘reduce the amount of material going to landfill and increase the recovery and recycling rate of materials in Victoria’.

In particular the City supports the following recommendations:

- The creation and implementation of overarching policy framework for waste, recycling and resource recovery, supported by specific targets for recycling.

- A consistent and ongoing education campaign to increase recycling and organics diversion from landfill and avoid contamination.

- Support for Councils to implement best-practice approaches to sorting and collections. This recommendation references Sustainability Victoria’s Optimising Kerbside Collection Systems.

   It is important to note that consistency across the state of materials that can be received in each material stream is vital to ensure educational messaging is consistent and relevant. The evidence base report mentions the need for bin standardisation; however, this is a small component of an efficient education program.

- Review of the Municipal and Industrial Landfill Levy settings to ensure levy is incentivising behaviour in line with the Victorian Government’s objectives.
The City currently operates two landfill’s, three transfer stations, and delivers general waste, recycling and organic collection services, and has 32 identified decommissioned landfill sites requiring rehabilitation investigation and ongoing monitoring. The City spends approximately $25M on waste recycling and organics annually. This includes approximately $4.9M payment of the EPA levy per year.

Bendigo is in a unique position where the last active landfill has limited operational time remaining. City staff continues to work tirelessly to research and find alternatives to landfill for the Bendigo region and surrounds, however without significant financial support from the MILL fund as well as clear direction from State Government regards hub locations of infrastructure and legislation requirements moving forward any real commitment to new technology financially and operationally is challenging.

It should also be noted that on April 17th 2019 CoGB Councillors endorsed four motions with two being relevant to waste related issues on matters critical to Greater Bendigo and local government in Victoria to go before the State Council meeting of the Municipal Association of Victoria in May 2019.

Motion: That the State Government provides the means for Victoria’s municipalities to retain the millions of dollars it collects annually in EPA landfill levies in order to fund approved programs designed to provide regional solutions to the current waste management crisis.

- Reduce contamination of glass, paper and plastic streams to reduce the cost and complexity of processing, improve the performance of MRF’s and support the development of end markets for recycled materials.

It should be noted that on April 17th 2019 CoGB Councillors endorsed four motions with two being relevant to waste related issues on matters critical to Greater Bendigo and local government in Victoria to go before the State Council meeting of the Municipal Association of Victoria in May 2019.

Motion: That the Victorian Government join other mainland Australian states by introducing a container deposit scheme to help build a sustainable recycling industry and help alleviate the State’s waste recycling crisis.

- Infrastructure investment or support focused on the development of a few end markets for problematic materials that have opportunity for greater recycling volume and long term uses as inputs to other products.
- Government guidance on the types of infrastructure that align with its priorities, to provide clarity and certainty to the sector.

- Initiatives to disincentives the use of virgin materials in production or promote the procurement of products made from recycled materials, including the following:

- A regular review of design and building standards, technologies and construction methods for roads and other infrastructure projects to help enable use of recycled materials.

- Updating Australian, Victorian and local government procurement guidelines to include sustainability and recycled content requirements needs to be prioritized and accelerated.

   **Council have recently supported the employment of a Circular Economy Coordinator to research and develop internal policies and procedures regarding the introduction of recycled products within future projects.**

- Provide clarity to the waste-to-energy sector including a clear, stable, pragmatic waste-to-energy policy as well as review of the landfill levy rates to incentivise infrastructure further up the waste hierarchy.

- Support high levels of recovery for organics, particularly food organics.

   **The City has successfully introduced a FOGO collection to 40,000 properties since 2017 and has achieved the lowest contamination rates within the state due to a dedicated and thorough education program. The City has also recently introduced a trial of commercial organics collection which has been very successful. There is hope to expand this service in the near future to further commercial properties across the municipality. Funding support from State Government to assist local government to implement and expand these services would be welcomed and encouraged.**

   **One obstacle encountered by the City when introducing the FOGO service was the limited options of disposal for the material and the transport distances required to reach appropriate composting facilities.**

- Supporting processing infrastructure closer to the source of waste or end market for recycled materials

- Product disclosure (such as standards, specifications and eco-labelling) for recycled organic materials to support a stronger end market for these materials
- Revisiting food safety standards to potentially enable the use of recycled organic material, such as compost or digestate from anaerobic digestion, in agricultural applications.

- Closing the floodgates – Waste export to be banned by the Australian Government

- Circular Stewards – Victoria’s circular economy policy sees government, industry and the community embracing new, circular business models which prioritise long-term product and material value. Mandatory product stewardship is key in this scenario.

As mentioned above and in our original submission to IV, the City would strongly encourage the state government to consider funding to support regional councils to construct sustainable alternative waste treatment infrastructure to replace landfills.

If Infrastructure Victoria is looking to implement alternative waste solutions, the City of Greater Bendigo would welcome the opportunity to be part of any future trials or pilots.

Please do not hesitate to contact me if you would like to discuss our feedback.

Yours sincerely,

Debbie Wood
Director Presentation & Assets