



**CORANGAMITE
SHIRE**

Our Ref: 2831260

11 December 2019

Infrastructure Victoria
GPO Box 4395
Melbourne VIC 3001

Dear Sir/Madam

Re: Submission to Recycling and Resource Recovery Infrastructure Report

Please find attached Corangamite Shire Council's submission to the "Recycling and resource recovery infrastructure" report. Corangamite Shire seeks to lodge this submission and provides support for the issues raised within the MAV submission.

Corangamite Shire is a large rural Shire of 4200 km² located in Victoria's south-west and stretches from Skipton in the north to the Southern Ocean in the south. There are 12 rural townships within the Shire, being Camperdown, Port Campbell, Terang, Noorat, Princetown, Derrinallum, Darlington, Lismore, Skipton, Cobden, Timboon and Simpson.

Corangamite Shire is currently responsible for a regional landfill and composting facility at Naroghid and manages closed landfill sites at Noorat and other population centres. The Corangamite Regional Landfill is a state significant waste management facility for the south-west region of Victoria.

Corangamite Shire supports the move towards creating a strong, sustainable recycling and resource recovery industry, although greater environmental benefit may result if Infrastructure Victoria developed actions from more preferred aspects of the hierarchy of waste management. Currently, investment in waste management and the waste hierarchy are poorly aligned with almost no funding available to create behavioural change to avoid the generation of waste. The report focuses on waste to energy and recycling only, and missed the opportunities to reduce waste through avoidance and reuse. In the longer term, the absence of any attempt to redress the current trends of consumerism is likely to create greater environmental impact and a significant financial burden on the community.

Corangamite Shire has concerns over how waste to energy (WtE) has been "preordained" in the report and promoted as an important step for the sector to support. This may be ill-considered as waste to energy effectively destroys the resource, and rather than eliminating the waste, only reduces its volume. Incineration WtE systems require a high amount of start-up energy and during the combustion process releases significant pollution which must be managed to ensure it does not go into the atmosphere. The trash remaining after incineration requires burying and is composed of concentrated toxic material with the same level of risk to the environment. Recently proposed options of spreading these toxic materials within road building materials also appears to create environmental concerns.


CORANGAMITE SHIRE COUNCIL

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Community enthusiasm and support for comingled kerbside recycling has been one of the great successes in waste management. This has been reflected within the evidence-based report. However, much more needs to be done to encourage the purchase of products containing recycled materials. Key steps should involve the alignment of government procurement, use of products by commercial and industrial organisations, and incubation of emergent technologies to develop new products. Corangamite Shire would strongly recommend greater involvement by Infrastructure Victoria in maturing the manufacturing sectors that create products containing recycled materials and supporting legislative change that mandates recycled material usage in new products. It is through market development that sustainable outcomes for the environment will be achieved.

Thank you for considering the matters raised within this submission. Corangamite Shire welcomes the opportunity to clarify any items if required. Should you require further information or would like to discuss our concerns please contact Lyall Bond on 5593 7100.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Mason', with a long horizontal flourish extending to the right.

Andrew Mason
Chief Executive Officer

Submission for the ‘Recycling and resource recovery infrastructure’ report

Corangamite Shire welcomes the opportunity to provide a submission to Infrastructure Victoria.

The population of Corangamite Shire has remained relatively static in recent times and is not projected to increase substantially into the future. The rural nature of our Shire creates vastly different development pressures when compared to metropolitan areas and councils which have a major service centre within their boundary.

Corangamite Shire currently operates a regional landfill and composting facility at Naroghid and also manages a closed landfill site at Noorat. The Naroghid facility is identified as a hub of regional significance in the Statewide Waste and Resource Recovery Infrastructure Plan, which is a key document for planning Victoria’s waste management future. Given the dispersed settlement pattern, Council also operates five small transfer stations. A key concern is the potential impacts of changes to waste regulation for the provision of current services to the Corangamite community.

Corangamite Shire has reviewed the evidence-based report on recycling and resource recovery infrastructure (October 2019). To assist in understanding the concerns of Corangamite Shire, feedback has been structured in two parts. Initially, around the core questions posed by Infrastructure Victoria and then finally through comment on the chapters “Opportunities, challenges and risks – no time to waste”, “Key early findings – potential actions”, and “Our view on the opportunities and challenges in the sector”. For greater clarity, Corangamite Shire has responded with a table for each subsection within the “Key early findings – potential actions”. These tables include Corangamite Shire’s response adjacent to each of the actions that Infrastructure Victoria has proposed. Concluding comments are in the final chapter “Our view on the opportunities and challenges in the sector” with recommendations for consideration that may be implemented to improve Infrastructure Victoria’s evidence-based report October 2019.

Corangamite Shire was invited to provide a response to the following specific questions and has done so in the following section.

Have we [Infrastructure Victoria] identified the right outcomes for Victoria to aim for?

- Corangamite Shire officers are concerned that much of the focus of the Infrastructure Victoria report assumes increasing waste generation into the future. Total waste has increased over the past 20 years. However, evidence provided in the report demonstrate decreasing rates of waste generation. Waste generation between 2000 and 2005 was 500,000 tonnes per year and between 2005 and 2017 was 290,000 tonnes per year. Kerbside bin audits and focus groups indicated the community of the south-west region supports recycling and there is a reduction in waste generation. Also, the culture of consumerism and ongoing consumption has been rejected by a growing number of people and the recommendations do little to reinforce this behavioural change broadly across the community.

Have we [Infrastructure Victoria] identified the most effective potential actions for government to take?

- Corangamite Shire officers believe that Infrastructure Victoria has not identified the most effective potential actions for government to undertake. Evidence provided to Infrastructure Victoria and published by Sustainability Victoria, the Australian Bureau of Statistics and the Victorian Auditor General's Office recommend encouraging waste management in accordance with the management of waste hierarchy. Corangamite Shire would like the Victorian Government to focus on waste avoidance and reuse of resources as first step in protecting the environment. With greater strategic alignment there will be less waste to be recycled and greater resource retention. The lack of material recovery facilities and processing sites in regional areas has been clearly identified as an issue by Infrastructure Victoria and others. The cost of recycling in regional and rural areas can be prohibitive with a combination of challenges, such as remoteness, transport costs and lack of scale. This is an obvious infrastructure gap that needed to be addressed further in the report.

Which, if any, of the initiatives implemented in Wales would you like to see applied in Victoria?

- The choice of Wales as a comparator state is puzzling. Wales has only 22 local authorities compared to Victoria's 79 councils, different population densities and it exists as a subset of a much greater economy, the EU. Corangamite Shire would see that as a rural community, it would need a tailored approach and considers that many of the directive strategies described for Wales would not be conducive to achieve meaningful, long term change. Elements of the Towards Zero Waste Strategy may be appropriate but further discussion would be needed. The AlphaBeta report notes that the Welsh Government is the main funder of waste management with about 85% of the cost of service. Corangamite Shire would welcome a similar investment by the Victorian Government to manage community waste.

What do you think of the market design opportunities proposed to improve waste sector outcomes and efficiency?

- There is a need for measured and targeted interventions to address market failures in the system. A strong decrease in waste generation and improved resource recovery could be achieved through improved acceptance of products containing recycled materials in the private sector. Specifications, certifications and pre-approval of products containing recycled materials are important to grow the market demand. This needs to be undertaken in conjunction with public sector procurement.

Where do you think government should focus their efforts to increase recycling and resource recovery? (for example, through setting targets, promoting consistency or funding local councils?)

- Corangamite Shire was curious that Infrastructure Victoria was specifically asked to investigate how Government can provide support for the waste to energy sector. Waste to energy is only one opportunity and the inclusion of waste to energy in the waste hierarchy seems to indicate Victorian Government preference and may indicate an undisclosed bias. All opportunities should be reviewed on the evidence and the report undertaken without pre-established preferences. Council believes that the existing waste hubs and landfills should be a key focus for future recycling and WtE infrastructure, which will then support and allow future management and resource recovery of wastes already stored in landfills.

- Corangamite Shire believes that Victorian industries such as manufacturing, construction and agriculture would be better positioned to have an impact on improving recycling and resource recovery. These industries consume large quantities of materials and their purchase (even if they included only a small per cent of recycled material) would have a large improvement in the recovery of materials.

Which materials or infrastructure types present the most opportunity in your region?

- One of the major challenges to recycling is the trend towards increased use of composite materials in packaging. Product stewardship and ensuring the ownership of both waste packaging and the challenges of separating composite materials requires government to create legislation to force manufacturers to think about legacy of products and their packaging. If the manufacturing industry holds responsibility for the return and end use of the product, greater design and thought will result in easier separation of materials and recycling recovery at MRF.
- The region requires a MRF and industries which use large quantities of sorted recycled products. If these are located in close proximity to existing facilities, the state will effectively create Resource Recovery Hubs with future growth potential as required.

What is a legislative barrier or enabler that you have encountered when trying to use recycled materials?

- Key barriers include a lack of available products which are easily interchanged for existing virgin materials, limited information and awareness about products, and low confidence in product suitability. In addition to this, there is also a lack of specifications and standards for products from a regulatory perspective. For example, the EPA stipulates the construction of waste cells at landfill require the use of geosynthetics that are composed of largely virgin material. As stated in the BPEM, "...it should not contain more than two per cent clean recycled polymer by weight of the HDPE resin". The specifications are developed by design engineers who are complying to EPA guidelines. The Victorian Government needs to provide clear direction (through EPA) and confidence that products containing recycled materials are suitable and safe to use.

1. SECTION 4.0 OPPORTUNITIES, CHALLENGES AND RISKS – NO TIME TO WASTE.

Corangamite Shire considers the continued consumption habits and the generation of waste a significant issue that needs State Government leadership and investment. It is regrettable that the State Government didn't include waste avoidance and waste minimization in the scope of work to be completed by Infrastructure Victoria. The waste hierarchy recommends avoidance and reuse over recycling and recovery of energy, and a higher level of investment is needed for these preferred strategies.

Waste to Energy is not one of the more preferred strategies in the hierarchy of waste management. Corangamite Shire considers inclusion of recovery of energy as a waste strategy within the waste hierarchy is flawed and may have detrimental effects on the environment. For example, when resources are burnt in a waste to energy facility, the resources that may have been recycled are lost. Corangamite Shire is concerned that energy recovery will become the default option and limited sorting will occur. The burning of bulk waste will release a cocktail of emissions into the atmosphere and the toxic trash remaining will still need to be landfilled in a very high level facility, although with a greatly reduced volume.

Corangamite Shire considers that some aspects of the report seem to contradict the evidence on hand. Despite three commissioned studies (AlphaBeta interjurisdictional analysis, Arup infrastructure analysis, and Centre for Market Design study) identifying product stewardship and extended producer responsibility as an important opportunity, little mention of product stewardship is present in the evidence-based report. A similar lack of stewardship can be found in the use of waste materials in road surfaces. There has been some trials of plastics and other materials including the use of waste to energy ash in road making surfaces. However, this approach will dilute the waste across a larger area and has no regard for its disposal at end of life of once the roads deteriorate.

Australia is a net importer of waste through electronics and packaging items. The discussion about the waste streams being exported should be broadened to include imported goods and the resulting waste streams and discuss the markets for these products in both arenas. As Australia supports limited manufacturing of products and electronics, we also need to consider where products are coming from and the ownership of materials through their product life. Importantly, the report should consider how the import of these products is managed to ensure they do not become waste items in the first place.

2. SECTION 5.1 SECTOR-WIDE IMPROVEMENTS

Corangamite Shire supports the Victorian Government in state-wide improvements such as education that seek to increase waste avoidance and recycling.

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Sector-wide improvements	
An overarching policy framework for waste, recycling and resource recovery, supported by specific targets for recycling.	<p>Supported in principle.</p> <p>Targets contained within policy frameworks may be set for Local Government without complementary industry targets. The later industry targets will more likely create meaningful systematic change. The ability of Corangamite Shire to create overarching community behavioural change will be dependent upon reducing waste generation and recycling industry outcomes.</p>

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Sector-wide improvements	
<p>A consistent and ongoing education campaign to increase recycling and organics diversion from landfill and avoid contamination.</p>	<p>Supported. A lack of state-wide education has contributed to community confusion about what materials can be recycled and led in part to material contamination issues. Increasing awareness about sustainable consumption and how to recycle properly is a critical education responsibility for Victorian Government. A considered education campaign aligned with the waste hierarchy would build the public's understanding of the benefits and importance of waste avoidance, reuse and recycling.</p> <p>Corangamite Shire Council offers FOGO kerbside collection services. Lack of processing capacity and ability to resource capital plant to create efficient and high-quality product is already an issue and will become more of an issue as more councils begin FOGO collection.</p>
<p>Support for councils to implement best-practice approaches to sorting and collections (references SV's <i>Optimising Kerbside Collection Systems</i> and bin standardisation).</p>	<p>Supported in principle It is important that bin configuration is flexible to allow Corangamite Shire to tailor services to its rural community needs. The bin infrastructure is a significant capital investment for Council and the changeover to meet AS 4123.7-2006 will be costly. State financial support will be important if all councils are expected to become compliant at a point in the future.</p> <p>Corangamite Shire supports further development with packaging design and labelling as a strategic opportunity. Ensuring packaging is recyclable and is accompanied by appropriate labeling to guide consumer decisions on disposal is essential.</p>

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Sector-wide improvements	
<p>Review of the Municipal and Industrial Landfill Levy settings to ensure levy is incentivising behaviour in line with the Victorian Government’s objectives for the recycling and resource recovery sector.</p>	<p>Supported in principle The Metropolitan and Industrial levy are identified for change to increase the incentive to follow government policy. Council officers support greater levy differentiation between rural and metropolitan areas. Officers believe the municipal and industrial levies in rural areas should consider the impact on rural sites providing localised solutions to waste management.</p> <p>The Metropolitan Landfill prices (\$185 to \$210 per tonne) quoted in Section 6.4.1 of the report are the advertised base prices and are not the actual prices being provided for large volumes of secured waste. Our Council has experienced this price discounting and can confirm there is a base gate price being offered of \$110 per tonne (including levy) which is undermining rural areas. Price gouging can be achieved in larger metropolitan sites as they have very large volumes. Regional facilities are losing volumes to metropolitan areas as the levy difference between metropolitan areas and rural areas is no longer a deterrent for moving waste. This has also been supported by ring road development and larger truck load limits. The difference between the rural and metropolitan levy must increase as it is no longer retaining rural waste in low risk rural areas/landfills.</p>

3. SECTION 5.2 SUPPORTING THE REPROCESSING SECTOR;

Corangamite Shire supports the reprocessing sector as proposed in the Infrastructure Victoria evidence-based report October 2019.

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Supporting the reprocessing sector	
<p>Reduce contamination of glass, paper and plastic streams to reduce the cost and complexity of processing, improve the performance of MRFs and support the development of end markets for recycled materials.</p>	<p>Supported in principle. Council officers support the aim to improve the quality of the materials being received for reprocessing, however this must not be an increased burden for the community. These costs should be upfront costs to clearly allow consumers to make informed decisions before purchasing. To include end of process changes simply increases the costs to the community without providing them with the choice to purchase or not purchase a product. Existing recycling services are course in nature and charge everyone the same regardless of behavior.</p>

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Supporting the reprocessing sector	
<p>Introduce a container deposit scheme (IV notes that their `preliminary view is that a CDS has promise but needs more analysis on how best to design an optimal scheme for Victoria, along with potential changes to kerbside collections).</p>	<p>Supported. Council officers support a CDS in its ability to incentivise recycling. However, greater understanding of the details is needed before fully committing to this being the primary solution.</p> <p>Council officers believe that a correctly implemented and managed CDS which includes more than just drink containers could greatly improve the quality of recycling received and at the same time deal with the issue of glass contamination in recyclables.</p> <p>Officers anticipate that an introduction of a CDS in Victoria will achieve cleaner streams of material and reduce litter. A CDS could be designed as cost neutral for the Victorian Government and be funded by those producing and consuming the goods rather than by the community more broadly.</p>
<p>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.</p>	<p>Supported. Council officers support the aim to improve the quality of the materials being received for reprocessing however this must not be an increased burden for the community. These costs should be upfront costs to clearly allow consumers to make informed decisions before purchasing. To include end of process changes simply increases the costs to the community without providing them with the choice to purchase or not purchase a product. Existing recycling services are course in nature and charge everyone the same regardless of behavior.</p>
<p>Government guidance on the types of infrastructure that align with its priorities, to provide clarity and certainty to the sector (Infrastructure Victoria notes that its final advice will `provide information on the specific types of waste management and recycling infrastructure needed in each region, with prioritisation).</p>	<p>Supported. It will be important that the government consults during the development of this guidance. Corangamite Shire believes the lack of materials recovery and reprocessing facilities within the western end of Barwon South West Resource recovery group needs to be addressed.</p>
<p>Initiatives to disincentivise the use of virgin materials in production or promote the procurement of products made from recycled materials.</p>	<p>Supported. Council officers agree that there needs to be legislation to disincentivise the use of raw products. This however should be done with clear targets for recycled products in new items (e.g. electrical goods). Council officers believe that a requirement for all new products to contain 15% recycled content would create a significant market force and drive for more recycled materials both in Australia and overseas.</p>

4. SECTION 5.3 BETTER ENABLE USE OF PRODUCTS CONTAINING RECYCLED MATERIALS;

Corangamite Shire believes that far more can be done to enable the use of products containing recycled materials than what has been outlined in the Infrastructure Victoria evidence-based report October 2019.

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Better enable use of products containing recycled materials	
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.	Supported. Corangamite Shire support a regular review of design and building standards that would enable greater voluntary uptake of products containing recycled materials. Many businesses within the Shire are driven by financial considerations and the community would benefit from understanding the value of products containing recycled materials.
Updating Australian, Victorian and local government procurement guidelines to include sustainability and recycled content requirements needs to be prioritized and accelerated. Consideration of pre-approval or certification of recycled products for appropriate uses.	Supported. Corangamite Shire supports updating Australian, Victorian and local government guidelines to include sustainability and recycled content requirements. As a regional community, transport costs for supplies of virgin materials versus supplies of recycled materials is and will remain a relevant consideration during purchasing decisions.

5. SECTION 5.4 PROVIDE CLARITY TO THE WASTE-TO-ENERGY SECTOR;

Corangamite Shire does not support an increase in waste to energy usage as proposed in the Infrastructure Victoria evidence-based report October 2019.

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Provide clarity to the waste-to-energy sector	
A clear, stable, pragmatic waste-to-energy policy.	Not Supported. As indicated in Section 1.0 there is an issue with the promotion of Waste to Energy where resources will be lost once incinerated and will not be available in the future. Also, Council officers believe that although landfills do pose a risk to the environment and currently do not allow for re-use of products, the materials are not lost. In the future, there is the ability to mine sites for appropriate materials when technology allows. An example of this was implemented in the south-west region when scrap metal prices were very high some councils used this price driver to extract scrap metal from old landfill sites and then rehabilitate to a higher standard than previously achieved. In the future this could be implemented for plastics, glass and metals in existing landfills.
Review of landfill levy rates to incentivise infrastructure further up the waste hierarchy.	Supported in principle. As per comment in Section 2.0, failure to invest greater amounts of landfill levy income back into our waste and resource recovery sector has no doubt contributed to the recent and ongoing challenges in the Victorian recycling sector. The levy should be hypothecated to fund initiatives that support waste avoidance, reuse and recycling initiatives. It is important to ensure that any changes in levies consider the communities ability to pay and the net result of illegal dumping which may increase.

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Provide clarity to the waste-to-energy sector	
Guidance on the types of waste-to-energy infrastructure the Victorian Government would like to see in Victoria.	Not Supported. Waste to Energy and Landfilling are competing waste management treatment options, after recyclables sorting has been achieved. Corangamite Shire is concerned that the report and the Victorian Government are providing evidence for preferential treatment to one industry over another.

6. SECTION 5.5 SUPPORT HIGH LEVELS OF RECOVERY OF ORGANICS, PARTICULARLY FOOD ORGANICS

Corangamite Shire supports higher levels of recovery of organics, particularly food organics in the proposed Infrastructure Victoria evidence based report October 2019.

PROPOSED ACTION	CORANGAMITE SHIRE RESPONSE
Support high levels of recovery for organics, particularly food organics	
'A consistent approach to organics collection by local councils, such as 'kitchen caddies' and/or food and garden organics (FOGO) collection for both municipal solid waste (MSW) and commercial and industrial waste (C&I) supported by a state-wide education campaign about organics recycling'	Supported. Increased diversion of food waste and greater recovery of organics is important. Where clean woody materials are available for incorporation into mulching council would be in favour of an education campaign to increase diversion from landfill waste.
'Increased separation and processing of organic materials would require supporting processing infrastructure to enable value added product and viable end market for organics. Current infrastructure is likely to be insufficient.'	Supported. Council officers agree organics are critical to remove from both landfill and WtE. This will be assisted if the composted/digested materials can be then sold or used in agricultural practices
Supporting processing infrastructure closer to the source of waste or end market for recycled materials	Supported. Council would support infrastructure that would enable diversion of construction materials that could be reused away from landfill. Such infrastructure that could be positioned at the point of regional landfills would enable such diversion to occur easily and simply.
Product disclosure (such as standards, specifications and eco-labelling) for recycled organic materials to support a stronger end market for these materials	Supported. Compost material could be made available for use by the agricultural community if they met standards and safety requirements. Supporting a stronger end market is important to facilitate this result.
Revisiting food safety standards to potentially enable the use of recycled organic material, such as compost or digestate from anaerobic digestion, in agricultural applications	Supported. Support for processing compost to high standards would be supported. Infrastructure investment in composting equipment would enable greater capacity and quality production.

7. SECTION 6 OUR VIEW ON THE OPPORTUNITIES AND CHALLENGES IN THE SECTOR;

Challenges and opportunities in Victoria

Corangamite Shire strongly supports the need for businesses to face the full cost of materials they use in production or of waste created by packaging and product obsolescence. Infrastructure Victoria evidence-based report October 2019 stated “households do not face all the costs of their waste consumption, sorting and disposal, which can lead to over consumption and contamination of material streams”. This situation is reflected across the state in both regional and municipal areas and needs Victorian Government policies and action to effect a change.

Corangamite Shire agrees that there are different processor acceptance standards for materials and the confusion that is present in the community has been experienced within Corangamite Shire. This confusion could be lessened through a state-wide education campaign and standardisation of materials acceptance through MRFs. However, the solution to contamination will not be to add more kerbside collection bins but to standardise and educate the Victorian community in what is and is not able to be recycled.

Corangamite Shire has some specific recommendations regarding the Infrastructure Victoria evidence-based report October 2019 that include:

- To more clearly reflect the significant difference between rural and metropolitan areas, community expectations and the issues faced. This is not reflected in the current report by Infrastructure Victoria.
- To provide for government intervention to support the development of a Material Recovery Facility in the south-west that is at distance from the population centres of Geelong and Melbourne.
- To provide guidance for standardisation of what is collected would assist the community in understanding what is recyclable and reduce contamination.
- Not to impose mandatory data collection and reporting and by so doing avoid any additional and unnecessary burden on the community.

Material flows and infrastructure needs

Corangamite Shire agrees that infrastructure plays a large part of the ability for the markets and commodities to trade. Council officers believe that further development of Circular Stewards (government, industry and the community working together to achieve avoidance of waste generation, introduction of a CDS, household FOGO collection and expansion of small-scale reprocessing) combined with a packaging crackdown as the most effective ways to improve the recycling industry in Victoria. More also needs to be done nationally to ensure we support each other and do not try to solve the problem state by state. Infrastructure Victoria could review those materials that are not being recycled and aim for closing the loop on a circular economy rather than finding solutions that only partly return materials to products.

The report indicates that more kerbside bins are required. Council officers are concerned as this then requires more collection and more cost to the community. In our municipality there are already three bins at kerbside and one bin in the kitchen. In addition to the cost of servicing these, they also require replacement over time which is already cost prohibitive for

some residents. Kerbside systems also do not reward those who choose to reduce their packaging and charges everyone equally. Officers are therefore reluctant to enforce more bins without cost neutral results for the rate payer. Officers have also been informed that stackable crates were considered the best option for multiple bins, however these are not suitable in rural areas or for our large truck movements required for kerbside collections.

There are several fundamental issues with the current e-waste ban which has resulted as items that are now banned from landfill have no processor or demand for the product. This has resulted in these unwanted e-waste items being stored until something becomes available.

Corangamite Shire has some specific recommendations for material flows and infrastructure needs that include:

- To provide funding for automated materials sorting infrastructure and facility buildings to enable construction of a MRF in the rural south-west. The location of the MRF would be best at a regionally significant landfill to further minimise transport costs for the waste fraction.
- To ensure continued community participation in the recycling of soft plastic materials such as silage wrap through greater product market development.
- To increase investment in technologies that process e-waste so that we will meet current and future needs (e.g. Solar panels).

The importance of Government Action

Corangamite Shire has some specific recommendations with the importance of Government Action that include:

- To create systems that better align all government agencies and effect greater recycling and use of products which contain recycled materials.
- Not to mandate any further additional requirements for the management of waste.

What options are available to the Victorian Government

Unless markets are mature, the experience of Corangamite Shire officers to the banning items from landfill is a negative impact on local MRFs and limited capacity to respond to influx of material. As has been found with the e-waste ban this is not the most appropriate action. Greater benefit may be gained from developing alternative markets and providing a demand for products that draw materials from MRFs and encourage recycling. Therefore, no items should be banned from landfill unless there is a strategic plan for market development or markets are already in existence to support the materials which are being collected.

The Infrastructure Victoria report discusses the issue of waste crossing borders but seems to be silent on the issues of rural waste going to metro areas. This flow of waste occurs from rural to metropolitan landfills due to highly discounted gate fees and improved road infrastructure. Several impacts result from this situation. Increased transportation of waste results in greater greenhouse gas emission, higher exposure and risk to communities and the environment, lower viability of smaller regional sites and increased costs to rural communities.

Corangamite Shire is also concerned with the reports statement that landfill gate fees are slightly lower than potential waste to energy gate fees. Waste to Energy needs to stack up without impacting the community/families. The Metropolitan Levy prices (\$185 to \$210 per tonne) quoted in Section 6.4.1 of the report are base advertised prices and are not the actual prices being provided that are up to \$100 per tonne less than the prices advertised. To falsely increase the levy to support one industry over another is not a sustainable market approach and should be avoided. It is important that the Waste to Energy technology improve to become more efficient and achieve market share.

The infrastructure component should be focused on supporting and building on existing hubs such as landfills. This would position landfills as centers of excellence for recycling and waste management with complementary industries that support each other such as landfill, composting, sorting, re-manufacturing and processing. This will then reduce the travel requirements for materials and ensure products are being sorted before disposal. This approach will also then build the case for Waste to Energy as they have multiple feedstocks and end products.

Corangamite Shire's recommendations for Infrastructure Victoria evidence-based report October 2019 include:

- To reflect the significant differences that exist between rural and metropolitan areas, community expectations and to incorporate appropriate actions redressing those issues in the Infrastructure Victoria report.
- To acknowledge in the report that waste to energy may create net harm to the environment through increased air pollution and burying residual trash if the processing is not managed carefully.
- To provide greater investment in infrastructure and education to increase waste avoidance and reuse of resources that compliments recycling and resource recovery efforts.
- To support both recycling and reprocessing of materials and a strong industry to manufacture items from the recycled products.