13 December 2019

Special Minister for State
Infrastructure Victoria
enquiries@infrastructurevictoria.com.au

Dear Minister

Recycling and Resource Recovery Infrastructure – Evidence Based Report October 2019

Thank you for seeking submissions to Infrastructure Victoria’s recently issued report, *Recycling and Resource Recovery Infrastructure – Evidence Based Report, October 2019*.

Council is supportive of the Government seeking to improve the recycling and recovery sector in Victoria. This Council has made submissions to other recycling-related inquiries and takes this opportunity to reinforce the following issues.

1. **The waste hierarchy**

   The waste hierarchy must be applied as the fundamental principle in considering how we manage waste. The hierarchy ranks waste management options in the following order from most to least preferred – Avoid; Reduce; Reuse; Recycle; and Dispose.

2. **Effective legislation**

   Effective State and Federal Government legislation is needed to ensure the waste hierarchy is applied across all levels and across supply chains.

3. **Waste and Resource Recovery groups**

   The State needs to establish a coherent, coordinated, effective and environmentally responsible approach to recycling and waste management. Having various government departments and Waste and Resource Recovery groups has to date not delivered the outcome our communities or the environment deserve. A review of the current arrangements needs be a high priority and this should consider a single lead agency approach to increase effectiveness and reduce costs.

4. **A competitive recycling industry**

   Competition in the recycling industry needs to improve. The lack of competition in the recycling industry has contributed to failures that have impacted Victorian communities at the present time. All levels of government need to work with industry to investigate ways that will increase competition and resilience of the recycling system, with a focus on local processing.
5. **Regional recycling and recovery facilities**
Greater access to recycling and recovery facilities is needed in regional areas. Government needs to provide incentives for industry to be more decentralised to assist in minimising transport costs, access sites that can minimise risk and conflict with residential areas and create greater diversity and competition across the state. This also offers opportunities for products to be sorted and potentially reused in the community that generated the recyclables.

6. **Container deposit scheme**
It is important that Victoria introduce a CDS to reduce contamination in the recycling stream. This action should also be supported by increase in the number of bins collected at the kerb.

All States except Tasmania and Victoria have introduced container deposit schemes. It is important that Victoria follow suit. Such schemes have been shown to reduce litter, remove a number of items from the kerbside collection and result in higher quality end products (e.g. paper and cardboard that remains in the kerbside collection has less contamination from broken glass). A system that involves the separation of materials prior to collection makes processing more efficient and leads to higher quality end products. Container Deposit Schemes can only be sustainable with Federal and State Government support.

7. **Introduction of a fourth kerbside bin**
As part of improving the efficiencies in the recycling streams a fourth bin should be introduced for glass. By removing glass from the co-mingled recycling stream will ensure the product is not contaminated by broken glass. Broken glass also reduces the quality of the paper and cardboard, which restricts it future use.

8. **Recycling and recovery of food and garden organics**
Council completed a Food Organics Garden Organics (FOGO) pilot service in the township of Anglesea that diverted food waste from the waste stream to be composted: creating soil, reducing carbon emissions and reducing the amount of waste being sent to landfill.

The pilot saw a 24% decrease in the volume of waste going to landfill from the Anglesea community. These types of local initiatives are assisting Council and the community to reduce our reliance on landfills, and should be introduced throughout Victoria. At the August Council meeting, Council endorsed the full roll out across the Shire. This material will be transported 300km to Shepparton for processing, as there are no local processors available.

The government needs to encourage investment in FOGO processors across Victoria to assist with developing this industry diverting food waste from the landfill.
9. **Consistent Messaging and Education**
   Now each processor accepts different products in the recycling stream. By having, the same products recycled across Victoria this will allow all Victorians no matter where they are in the state to have certainty on the produces to recycle and this will reduce contamination. By educating our communities on the cost to the economy and the environment by increasing education on the recycling process this will provide greater outcome as residents will better understand the impacts on the products they purchase.

   To add to the confusion for residents when they move between Council areas, bin colours vary widely. To assist in education and to improve contamination rates all kerbside bin colour schemes should be complaint to AS 4123.

10. **Deliver product stewardship**
    The current waste and resource recovery system provides limited incentive for designers, manufacturers and importers to take responsibility for the full lifecycle of their products and packaging. Product stewardship is the biggest issue that all levels of government need to address by applying a united approach to its resolution.

11. **Encourage local manufacturing of products from recycled content**
    All levels of governments should be advocating for and encouraging local processing and manufacturing of useful products from recycled materials. This may include a review of procurement policies for government departments and agencies, requiring them to purchase a percentage of products that are made from or include recycled materials. Both seeking and purchasing products made with recycled content will drive market development and encourage local manufacturing of these products.

12. **Work towards banning single use disposable plastics and hard-to-recycle materials**
    All levels of Governments should be working together to legislate the banning of single use plastics to reduce the harm of plastic litter to our marine and freshwater environments, and the volume of plastic materials that need to be recycled. Legislation should also include the banning of hard-to-recycle materials (e.g. expanded polystyrene, liquid paperboard, plastic lined coffee cups) where alternatives exist. These requirements should also relate to sporting and non-sporting events held throughout the state, which would serve to reduce volumes of problem plastics, and serve as a valuable education opportunity.

   Council looks forward to seeing DELWP’s Plastic Pollution Prevention Plan when it is released. We have seen success ourselves in reducing single use plastics in the shire through implementing the Surf Coast Plastic Wise Policy for Events and Markets (attached), and encourage the broader application of such policies and/or legislation.

13. **Community education and engagement**
    In addition to its traditional roles of collecting and disposing of kerbside waste, local government recognises it plays a very important role in helping to educate our community on how to reduce waste, increase diversion of waste from landfill, and ensure materials can be recycled. Local government needs to continue advocating through its associations to encourage market expansion of industries and products that use recycled content.
14. **Landfill Levy and waste disposal costs**

At the present time, the cost to dispose of waste to landfill is low compared to waste to energy options. Waste to energy options need to be investigated to reduce the amount of waste going to landfill, but the priority is to avoid the volume of waste product. This Council encourages the government to use of the Landfill levy (Sustainability Fund) to assist the industry to improve the waste and resource recovery sector by encouraging waste reduction, increasing Victoria’s capacity to process recyclable materials and developing markets that provide long-term gains for the community and the environment.

If you have any enquiries concerning this matter, please contact Ian Stewart on 5261 0600.

Yours faithfully

Cr Rose Hodge
Mayor
1. Purpose
This policy is Council’s commitment to eliminating single use plastic items at events, markets and organised sporting activities held at all sites owned and managed by Council.

2. Rationale
Plastic pollution is an urgent environmental problem. The production and use of plastic all around the world continues to grow, and it is expected that plastic production will double over the next 20 years, and quadruple by 2050 if we don’t stop this cycle (DELWP, 2017).

Council and our community recognise the negative impacts that single use plastics and excessive packaging have on the local environment and on the earth’s natural resources. Developed with our community and organisers of local events, this policy is Council’s commitment to take local action on this global issue.

The problems with plastic
Globally, thousands of tonnes of plastic enter our waterways and oceans each year, with much of this being lightweight, single use items that are littered or blown from one place to another.

In the environment, seabirds, turtles and marine mammals are particularly vulnerable to the impacts of plastics, through swallowing them or becoming tangled in larger items. This can lead to reduced mobility, disrupted feeding, suffocation and death (DELWP, 2017) – often having flow on effects for the food webs they are part of.

Further to this, plastics break up into smaller and smaller pieces (microplastics) over time. This means that the impacts of plastic pollution are long term, and become increasingly difficult to manage. More and more, we are discovering the harmful effects of microplastics on environmental health and on human health. For example, as small organisms consume these plastics, they move up the food chain – including into fish and seafood that humans are consuming. Even when plastic is contained in a landfill, toxins can leech from it into soil and water.

Community and Council response
Council introduced the Plastic Wise Events and Markets Policy in April 2016. The policy was developed in response to Council’s Environment and Rural Advisory Panel’s 2014 recommendation that Council adopt a plastic wise approach.

The Great Ocean Road Coast Committee also adopted the policy in 2016, and having a consistent expectation for event and market organisers across the shire has been, and will continue to be, key to its success.

Local townships and community groups such as Plastic Wise Torquay (formally Plastic Bag Free Torquay), Plastic Wise Winchelsea, Lorne Goes Plastic Free and Boomerang Bags continue to play a significant role in implementing a plastic wise approach in their communities, including working with event organisers to comply with the Plastic Wise Policy. Many organisers of markets and events held in the shire are also passionate about eliminating single use plastics, and have demonstrated this, for example, by working with their stallholders to eliminate plastic packaging, and/or introduce systems to capture certified compostable packaging and ensure that it is converted into a compost product.

In 2018, the Plastic Wise Guide for Markets and Events in Surf Coast Shire was developed as a reference to assist all event organisers to comply with the policy. It describes ‘plastic wise’ events as ones that avoid...
plastic and disposable items that present risks to the natural environment and/or are discarded after only a short period of use. More broadly, the Plastic Wise Guide and Policy are based around the waste hierarchy – prioritising avoidance, reduction, reuse, then recycling, with disposal being the last resort.

Reviewing the Plastic Wise Policy in 2018 has provided the opportunity to reflect on what has been learned and achieved so far, and to hear our community’s aspirations for what they would like to see in future.

Future directions
We are seeing many changes in what we know as ‘plastic’, with a wider range of alternative materials and products becoming available. Bio-based and compostable packaging provide both opportunities and complexity in the shift away from traditional plastics. For example, bio-based plastics cannot be recycled with traditional petrochemical plastics, and the majority of products currently being labelled ‘compostable’ must be processed in commercial facilities, not home composting.

Locally, nationally and internationally, there is a notable shift away from the distribution and use of single use plastic items. In Australia, Coles, Woolworths and IGA supermarkets removed single use plastic bags from their registers in 2018 ahead of a similar State Government ban coming into effect in 2019. On the world stage, London Marathon and Glastonbury Festival will ban single use, disposable plastic bottles and introduce alternatives at their 2018 and 2019 events respectively.

In setting expectations in the Plastic Wise Policy, Council is conscious of avoiding any unintended negative impacts – by considering how items will be managed at the end of their use, and being clear that the priority is to remove the risk of plastic having a harmful impact on the natural environment.

More broadly, Council is committed and aspires to eliminating all waste being sent to landfill or finding its way into the environment. Council will continue to demonstrate leadership and strengthen the role this policy plays in achieving this through updating the Plastic Wise Guide annually until 2021 as a minimum.

Council and our community have been active in sharing the Plastic Wise Policy with other councils, land managers and community groups, and will continue to support others to adopt and apply their own policies or approaches.

3. Scope

Events
This policy applies to all events, markets and regular/organised sporting activities conducted on land, in buildings, at venues and on roads owned or managed by Council.

It includes all civic, commercial and community events such as markets, festivals, ceremonies, exhibitions, expos, meetings, functions, workshops, information sessions, conferences, parties, competitive sporting events, and other organised sporting and recreational activities.

Single use plastic items
This policy covers single use plastic and polystyrene items used in purchasing, packaging, sales, distribution, transportation, set up and pack down (bump in and bump out), participation, promotion and clean up practices associated with events. Refer to sections 7.2.3 and 7.2.4 of this policy for details of products covered.

Organised sporting and recreational activities
Engagement with managers and users of Council owned and managed sporting facilities and community sporting clubs operating at Council sites will begin in 2019, with the requirement that they are compliant with this policy by December 31 2021 or sooner.

Exemptions
Exemptions to this policy will be made for valid health, wellbeing or safety reasons, or where there is no practical alternative product or option currently available. All exemptions require prior written approval from Council’s Coordinator Events – to be arranged through a Council officer associated with the event.
4. Application
This policy applies to all Surf Coast Shire Council employees and contractors, and all individuals, groups or organisations planning, organising, running and/or approving events, markets and sporting activities at Council sites. It includes stallholders/vendors, sponsors, contractors, volunteers and service providers who are on site as part of the event.

Event organisers must demonstrate how they will achieve compliance with this policy through the event planning process, such as the Event Brief (internally organised events) or Event Application (externally organised events).

The Plastic Wise Guide for Markets and Events in Surf Coast Shire (available at www.surfcoast.vic.gov.au/plasticwise) should be referred to for guidance on ways to meet the requirements of this policy.

The Great Ocean Road Coast Committee (GORCC) has also adopted this policy for events and markets held on land managed by them. Together, Council and GORCC are committed to reviewing the Plastic Wise Guide annually until 2021 as a minimum, in order to reflect changes in products and product materials, waste management systems, capacity and other factors. Where possible, brochures, guidelines and other materials to support this policy are co-branded with GORCC.

5. Definitions

<table>
<thead>
<tr>
<th><strong>Event</strong></th>
<th>Any planned activity that occurs in a certain place, during a certain time, which involves a gathering of people and has some level of impact on the immediate surroundings.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>For the purpose of this policy it includes all civic, commercial and community events such as markets, festivals, ceremonies, exhibitions, expos, meetings, functions, workshops, information sessions, conferences, parties, competitive sporting events, and other organised sporting and recreational events.</td>
</tr>
<tr>
<td><strong>Civic event</strong></td>
<td>Any event organised by Council staff.</td>
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<tr>
<td><strong>Commercial event</strong></td>
<td>An event conducted for profit.</td>
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<tr>
<td><strong>Community event</strong></td>
<td>An event conducted by or for the community.</td>
</tr>
<tr>
<td><strong>Sporting and recreational activities</strong></td>
<td>Any regular or organised sporting or recreational activity occurring at Council owned or managed sites, including those run by community sporting clubs.</td>
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<tr>
<td><strong>Council sites</strong></td>
<td>Land, buildings, venues, roads or any other location owned or managed by Council.</td>
</tr>
<tr>
<td><strong>Plastic</strong></td>
<td>Polyethylene, polystyrene and polypropylene made from petrochemical compounds, including degradable and biodegradable products made from these compounds.</td>
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<tr>
<td><strong>Bioplastic</strong></td>
<td>A term that can describe either bio-based or biodegradable plastic, including plastic items that are made with or without the use of petrochemical compounds.</td>
</tr>
<tr>
<td></td>
<td>Bio-based plastic: Plastic made from natural bio-polymers – i.e. organic and renewable materials such as rice, starch, sugar cane, wheat or corn.</td>
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<td></td>
<td>Biodegradable plastic: Plastic that has the potential to break down into its natural components over a period of time. These products can be made from natural and/or fossil fuel based materials.</td>
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<tr>
<td><strong>Certified compostable</strong></td>
<td>A subset of biodegradable plastic, made from material assessed to be compostable in a commercial composting environment in accordance with Australian Standards.</td>
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</tbody>
</table>
Single use plastics
Any disposable plastic or polystyrene item that is designed to be used only once or for a short period of time before being discarded. They include, but are not limited to, plastic bags, cups, bowls, plates, cutlery, straws, bottled water, sachets (e.g. sauces, sunscreen), containers, packaging and other similar items. For the purpose of this policy, it also applies to balloons, disposable paper cups with plastic linings and/or lids (for hot or cold drinks), plastic glitter, glow sticks and confetti, and single use or disposable plastic promotional items and giveaways.

Single use plastic bag
A type of bag or pouch made from thin, flexible, plastic film that is used for containing or transporting goods, designed to be used only once or for a short period of time before being discarded. For the purpose of this policy, this definition includes both thin (35 microns) and heavier weight disposable or limited use plastic bags.

Soft plastics
Plastic products that can be easily scrunched up in your hand and cannot be recycled through Council’s kerbside recycling collection. They include, but are not limited to, plastic bags (including shopping bags, freezer bags and garbage bags), cling wrap, lolly wrappers, chip packets, shrink wrap, bubble wrap and other packaging.

Plastic bottled water
Drinking water sealed in plastic bottles designed or intended to be discarded after consumption.

Waste hierarchy
The waste hierarchy ranks waste management options in order of their general environmental desirability. Rankings are Avoid (most preferred); Reduce; Reuse; Recycle and Dispose (least preferred).

6. Council Purpose and Direction
This policy is consistent with Council’s purpose to ‘help our community and environment to thrive’ and helps deliver on one of Council’s organisational directions ‘to be an innovative and flexible leader and a constructive partner’.

7. Policy
7.1 Expected outcomes of this policy
7.1.1 Deliver Council and community events that demonstrate the principles of the waste hierarchy – prioritising avoidance, reduction, reuse, then recycling, with disposal being the last resort.

7.1.2 Apply a best practice plastic wise approach to all Council run events.

7.1.3 Help our community to achieve, or make progress towards a best practice plastic wise approach for events and markets that they run.

7.1.4 Develop and maintain positive and constructive relationships with event and market organisers and our community.

7.1.5 Ensure the Surf Coast Shire Plastic Wise Guide for Markets and Events is kept up to date to assist all event organisers to operate consistently with this policy.

7.2 Expected event outcomes
Before the event – planning
7.2.1 Event organisers plan to incorporate and accommodate the principles of the waste hierarchy before, during and after the event.

7.2.2 Event organisers are active in educating and guiding their event staff (including volunteers, contractors, service providers), vendors/stallholders, sponsors, patrons and participants on why a plastic wise approach is important and what practices should be followed, including:
- Eliminating all disposable plastic items where possible;
- encouraging and enabling the use of reusable alternatives;
- ensuring that no plastic items become litter at the event site; and
- providing information and infrastructure to assist with achieving the above.
7.2.3 Some plastics are both a greater risk to the environment and/or are more easily avoided or replaced. Recognising this, the following products are not used, sold or distributed (unless an exemption is granted for health, wellbeing or safety reasons):
- Single use plastic bags, including promotional or event participant bags;
- single use plastic plates, bowls, cups, straws, cutlery, food containers and sachets;
- single use/disposable items and plastic packaging used for promotional items, giveaways and merchandise;
- plastic bottled water (also refer to 7.2.6 about the provision of drinking water); and
- balloons.

7.2.4 Some plastics remain a risk to the environment; however they are currently less easily avoided or replaced. Recognising this, if they cannot be eliminated immediately, event organisers demonstrate a shift away from the following (unless an exemption is granted for health, wellbeing or safety reasons):
- Single use, plastic lined and/or plastic lidded cups used for hot or cold drinks (e.g. takeaway coffee cups);
- single serve drinks (in addition to water) that are packaged in plastic bottles, e.g. soft drink, juice, milk, etc. (Note: also refer to Council’s Local Law 2, section 4.1.2 Glass Free Areas).
- soft plastic packaging including cling wrap, wrappers, bags and similar; and
- single use or limited use plastic items used in event infrastructure and promotion, including cable ties, course markings, decorations and giveaways.

7.2.5 Cigarette butts, which consist mostly of plastic with a thin paper coating, are contained and prevented from entering the natural environment, and disposed of to landfill after the event.

7.2.6 Access to free drinking water is provided (unless the event location prevents this) and clearly signed, along with alternatively packaged water if it is required.

7.2.7 Organisers of events that require an Event Brief (Council run events) or Event Application (external events) provide to Council a waste management plan.

7.2.8 All events, regardless of whether they require a waste management plan, strive to meet the following waste management outcomes:
- Certified compostable cups, cutlery, containers, packaging, etc. are collected and sent for processing into compost;
- if it cannot be avoided, soft plastic packaging is collected for recycling through a separate waste stream; and
- event materials (e.g. event signage, promotional banners, flags and course markings) are designed for future reuse, rather than disposal.

During the event – delivery and performance monitoring
7.2.9 Event organisers are active in educating and guiding their event staff (including volunteers, contractors, service providers), vendors/stallholders, sponsors, patrons and participants on why a plastic wise approach is important and what practices should be followed.

7.2.10 No items, including small items such as cable ties and cigarette butts, become litter.

7.2.11 Event organisers monitor their event and collect evidence (e.g. photos) that illustrate the effectiveness of their plastic wise approach and waste management systems with the intention to identify opportunities for improvement for future events and for this policy.

After the event – clean up and evaluation
7.2.12 The event site or venue is left litter free and returned to pre-event conditions in the agreed timeframe, and with no risk of litter items impacting the environment, e.g. waterways, in this time. (Note: any site remediation required will be at the expense of the event organiser).

7.2.13 Event organisers should review their event against the Expected Event Outcomes of this policy to identify opportunities for improvement for future events and for this policy.
7.3 Council officer responsibilities
Council officers involved in the planning, approval and/or delivery of events will:

- Apply a best practice plastic wise approach to all Council run events;
- seek to develop and maintain positive and constructive relationships with event and market organisers and our community;
- help our community to achieve, or make progress towards a best practice plastic wise approach for events and markets that they run;
- ensure that the Surf Coast Shire Plastic Wise Guide for Markets and Events is updated annually, to assist all event organisers to operate consistently with this policy;
- when there is repeated, poor adherence to this policy, recommend to Senior Management that these events not be supported or approved by Council; and
- ensure that events receiving Council grants and/or sponsorship commit to complying with the policy before support is made available.

8. Records
Records shall be retained for at least the period shown below.

<table>
<thead>
<tr>
<th>Record</th>
<th>Retention/Disposal Responsibility</th>
<th>Retention Period</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Event application and approval correspondence</td>
<td>Economic Development &amp; Tourism Internal Events Officer</td>
<td>Ongoing</td>
<td>HPRM</td>
</tr>
<tr>
<td>Plastic Wise Guide for Markets and Events</td>
<td>Environment &amp; Community Safety</td>
<td>Ongoing</td>
<td>HPRM</td>
</tr>
</tbody>
</table>

9. Attachments
The Plastic Wise Guide for Markets and Events (Edition 1, May 2018), D18/62134, was developed to support Council staff and event organisers to implement this policy, and will be kept updated for this purpose.

10. References

Surf Coast Shire Council documents
- Event Brief – submitted for events organised by Council staff
- Event Application – submitted for events organised external to Council (and GORCC)
- Council Policy: Plastic Wise Events and Markets on Council Owned/Managed Land, approved 26 April 2016, D16/20510
- Surf Coast Shire Council Plan 2018 – 2021 (Theme 2, Environmental Leadership)
- Workshop summary – Environment and Rural Advisory Panel, 23 August 2018, D18/132264
- Meeting summary – Council and GORCC, 17 July 2018, D18/101797
- Workshop summary – event organisers and Plastic Wise community groups, 12 June 2018, D18/74321
- Plastic Waste Wise Approach, D14/94136
- Surf Coast Shire Events Policy, D15/68949

External documents
- Darebin City Council Single-Use Plastic Free Events Policy, version 1.0 (February 2018)
- Indigo Shire Council Plasticwise Policy, version 1b (April 2018)