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**NATIONAL WASTE AND  
RECYCLING INDUSTRY COUNCIL**  
ABN 22 617 891 899

Via email: [enquiries@infrastructurevictoria.com.au](mailto:enquiries@infrastructurevictoria.com.au)

Dear Michel Masson,

The National Waste and Recycling Industry Council (NWRIC) is funded by the major national waste and recycling businesses operating in Australia. It's core purpose is to represent its members priorities to government and promote their contribution to the community, environment and the economy.

Founding members of the Council, Alex Fraser Group, Cleanaway, J. J. Richards and Sons, Solo Resource Recovery, Sims Metal Management, Suez, Remondis, ResourceCo and Veolia own and operate the majority of waste management and recycling facilities and trucks in Australia.

The Council works closely with its state and territory affiliates;

1. the Waste Recycling Industry Association of Queensland (WRIQ),
2. the Waste Contractors and Recyclers Association representing NSW & the ACT (WCRA),
3. the Victorian Waste Management Association (VWMA),
4. the Waste Recycling Industry Association of South Australia (WRISA),
5. the Waste Recycling Industry Association of WA (WRIWA), and the
6. the Waste Recycling Industry Association of the Northern Territory (WRINT)

The NWRIC and its affiliates collectively represent over 450 waste and recycling businesses nationwide.

The Council welcomes the opportunity to comment on the Infrastructure Victoria: Recycling and Resource Recovery Infrastructure: Evidence base October 2019.

Please see the attached submission in response to the discussion paper.

For further information please contact NWRIC Secretary Alex Serpo ([secretariat@nwrlic.com.au](mailto:secretariat@nwrlic.com.au) or 0417 932 303) in the first instance.

Yours sincerely,



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**COUNCIL MEMBERSHIP INCLUDES  
NINE FOUNDING MEMBERS**

Cleanaway | JJ Richards and Sons | Remondis  
SUEZ | Veolia | Solo | Resource Recovery  
Alex Fraser | Sims Metals and ResourceCo.

**IT ALSO COMPRISES STATE  
AND TERRITORY AFFILIATES**

Waste Recycling Industry Queensland (WRIQ)  
Waste Contractors and Recyclers Association  
of NSW & ACT (WCRA) | Victorian Waste  
Management Association (VWMA) | Waste  
Recycling Industry of South Australia (WRISA)  
Waste Recycling Industry of Western Australia  
(WRIWA) and the Waste Recycling Industry  
Northern Territory (WRINT)

## Infrastructure Victoria - response to questions

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### Definitions

The NWRIC is very concerned with how “Recovery” has been defined in this document. It should not include collection, sorting and aggregating. This is incorrect, confusing and contrary to how recovery is used in the industry.

Recovery is the amount of resources or energy recovered from materials in a recycling or energy recovery process. It is not the process of collecting, sorting and aggregating. See the definitions used in the National Television and Computer Recycling Scheme (NTCRS) and the AS 5377 Standard for the Collection, Transport and recycling of End of Life Electronic and Electrical Equipment.

This is important in terms of achieving performance indicators. Typical performance indicators are material recovery rates, for example, target under the NTCRS.

Collection, sorting and aggregation should be identified separately. They are often undertaken by different organisations and should be measured separately.

To understand and manage waste and resource recovery better it is important that these phases are all recognised and measured separately to avoid confusion and have better traceability of materials through a circular economy.

### Role of the Australian Government

It is disappointing to see a lack of understanding of the various federal Acts and initiatives that impact the waste and recycling industry and influence waste and resource management in Australia.

Specifically there is no acknowledgement of the following Acts and initiatives;

- Product Stewardship Act 2011
- Product Stewardship (Television and Computers) Regulation.
- Hazardous Waste Act
- Customs Act
- National Environment Protection Council Act
- National Environment Protection Measure Used Packaging
- Oil Stewardship Act
- Emissions Reduction Fund
- National Food Waste Strategy
- National Heavy Vehicle Regulations
- Dangerous Goods Act
- Carbon Credits (Carbon Farming Initiative) Act & Regulations (Landfill and Alternative Waste Treatment).

### Have we identified the right outcomes for Victoria to aim for?

The outcomes listed are appropriate and comprehensive and the NWRIC agrees that the highest priority outcome for waste and recycling infrastructure is strong local and state planning for existing and new waste and recycling facilities. Specifically, preventing encroachment of existing sites and allocating dedicated green zones for future sites. As well as ensuring tenure and buffer zones for existing and new sites and that there is sufficient facilities strategically located across the State to service businesses and communities to handle any failures elsewhere in the system.

What has also been lacking is the failure to integrate the SWRRIP and Regional WRRIP with local and state planning decisions and plans.

One gap in the outcomes is linking strong end markets with ensuring recycled materials are being used in products and packaging put onto the market. If Victoria is to progress to a more circular economy using recovered materials in products and packaging as well as new construction projects is key.

### Have we identified the most effective potential actions that government could take?

With regard to waste and recycling infrastructure for Victoria, the NWRIC agrees the importance of minimising waste generation as a key driver in ensuring a more resilient waste and resource management sector.

Specifically, we believe progress includes product stewardship initiatives at a state and national level; banning prob-

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lematic and hazardous materials and chemicals; community and business education; enabling greater reuse, repair and sharing reducing Victoria's waste generation.

More specifically, with regard to the five areas of potential action, we offer the following comment;

- **Sector wide improvements**

Education and consistency on bin lid colours and contents is essential. Victoria has too much variability at the kerbside in particular. This is a simple fix and should be progressed as a matter of urgency. Waste generators either local councils on behalf of their households and businesses should be held accountable financially for not complying.

Monitoring and reporting on the movement of products and materials through the economy to ensure their use is optimised and any hazardous or dangerous items, substances and materials are disposed of properly and responsibly is very important. Given the rapid development of digital technology this can be implemented more cost effectively for all stakeholders. Resourcing upgrading of facilities and businesses to be able to contribute to this information flow will be required. This system will help develop more meaningful performance indicators and targets to measure the health and sustainability of the waste and resource recovery sector.

- **Supporting the reprocessing sector**

As acknowledged in the report the two key drivers to best assist the reprocessing sector are firstly, creating stronger end markets for recovered materials through government procurement and secondly, cleaning up the input of materials into the reprocessing sector through better education, source separation, equipment to transport materials more efficiently without compromising material quality and sorting equipment.

On the market development side the NWRIC is calling for mandated minimum recycled content levels in packaging, products and construction (e.g. roads etc). Without demand for recovered materials there will be no reprocessing sector or resource recovery.

The NWRIC also strongly supports the introduction of a container deposit scheme in line with the rest of Australia as a matter of urgency as a way to clean up input of materials in the recycling sector.

As well as implementing a regulated battery recycling program to remove these dangerous items from rubbish and recycling collections, where they contaminate valuable recyclables and cause fires.

Similarly, the NWRIC supports the banning hazardous substances e.g. PFAS in products and problematic and difficult to recycle plastics in packaging such as PVC, PS.

- **Better enable use of products containing recycled materials**

If Victoria was doing well in using recovered materials, it wouldn't have stockpiles of glass and tyres.

No state or territory, including Victoria has created the right regulatory or procurement policies currently to create a market pull for recovered materials to consider otherwise is naive.

Victoria along with every other local, state and federal government needs to significantly ramp up its efforts to identify where and how they can use recovered materials and reflect this in nationally coordinated specifications and procurement guidelines as a matter of urgency.

Victoria along with every other local, state and federal government needs to report annually on how much recovered materials or products and packaging with recycled content they have purchased. This reporting requirement should also be put in place for publicly listed companies.

- **Providing clarity to the waste to energy sector**

The NWRIC supports waste to energy as an important solution to deal with those materials and products that can not be recycled or composted. This technology can be used in Victoria to manage non-recyclable or contaminated organic material. Certainty on where business can invest is essential.

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With regard to landfill levy pricing, the NWRIC is calling for a 'National Waste/Landfill Levy Pricing Strategy' that ensures the differing levy price points across the State and Territories do not encourage poor resource recovery outcomes and irresponsible waste management. Please see attached *NWRIC White Paper: A Review of State waste and Landfill Levies*.

- **Support high levels of organics, particularly food organics**

The NWRIC fully supports greater diversion of organics and food waste from landfill. As identified in the report the key areas for action are creating markets for compost, this requires substantial work with the agricultural sector and local councils, both potential users of this material. Strategic location of composting facilities to be able to balance distance from source to market. Improved collection methods and strict controls on compostable packaging (national standards) to ensure organic and food waste streams are not contaminated. Plus substantial education to ensure households and businesses can participate responsibly. Along with support for R&D to develop compost products and fertilizers.

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

Across the UK, there has been harmonisation of waste and recycling regulations across a population in excess of 60 million. Australia could follow this example and seek a national vision across the six States and two Territories. The NWRIC believe waste and resource recovery regulations should be harmonised in a similar manner to the National Heavy Vehicle Regulator (NHVR); or Work, Health and Safety (WH&S) regulations.

Wales has invested in energy recovery technology, and has many process engineered fuel factories. These represent a better environmental and economic outcome compared to landfill. In the UK biosolids are recovered for energy when too contaminated to apply to land.

As indicated in the discussion paper, the weakness in the Wales strategy is the underdeveloped markets for some materials, especially plastics.

The NWRIC considers that Victoria should not follow past actions by other states, but rather learn from their errors and focus its efforts on creating markets for recovered materials as its first priority and reducing waste generation and contamination of recyclable materials as its second priority. This will facilitate greater value and re-circulation of materials through the economy. This approach underpinned by much stronger planning regulations that protect and ensure future provision for waste and recycling sites across Victoria is key.

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

There are two aspects to ensuring developing market opportunities for recycled materials.

- Mandating minimum recycled content levels in construction, products and packaging by material type and being able to amend this over time. This can be done through government and business procurement, product stewardship schemes.
- Being able to provide recovered materials to required manufacturing/construction standard. This requires;
  - clear minimum specifications on what constitutes a recycled resource for each material type. E.g. see the ISRI Scrap Specifications that are for metals, paper, glass, plastics,
  - sorting equipment,
  - clean input materials, better source separation by having consistent agreed nationwide bin lid colours,
  - banning or creating alternative collection methods for problematic, hazardous or other materials and products.

The NWRIC also notes the additional report from the Centre for Market Design (CMD). In particular the NWRIC supports the proposed initiatives including;

- mandatory insurance for all waste facilities,
- additional 'government created' market incentives for recycling,
- better and clear specifications for recovered materials,
- better policing of markets and initiatives to prevent illegal dumping, and
- support for more clarity in policy outcomes.

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

The NWRIC considers the highest priorities are;

- Creating markets for recovered materials through procurement and mandating minimum recycled content in construction, products and packaging,
- Integrated planning system that ensures waste and recycling sites are adequately provided for including protection from encroachment, dedicate green zones for future development,
- Statewide consistent bin lid colour system with very clear directions on what is accepted in these bins. There should be no variation between councils on what can go in what coloured bin (see WA approach). Ideally this would be consistent with all other States and Territories.
- Diverting organics and food from landfill.
- Clear policy position on what role landfills and waste to energy facilities can play in managing Victoria's non recyclable and hazardous materials.
- Great tracking and tracing of waste generation and movement of waste through the whole economy.
- Work with other states and territories on developing and implementing a National Pricing Strategy for Waste and Landfill Levies, including a national protocol for landfill levy portability as outlined in [NWRIC's White Paper: Review of State Waste and Landfill Levies](#).

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

The highest volume of material available for diversion from landfill in Victoria is via energy recovery, composting for clean organics and the recovery of construction materials at licenced best practice recycling facilities.

Product stewardship opportunities exist for batteries, tyres, e-waste and PV panels. Mandatory product stewardship would create sufficient market incentive for investment into infrastructure.

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

*Legislative barriers*

- Insufficient policing to prevent large scale illegal dumping, or EPAs allowing the operation of substandard facilities.
- A lack of consensus between State and Local Governments in regard to the long term siting of essential waste management infrastructure.
- Insufficient or weak product stewardship regulations to ensure product products are captured and recovered, or treated appropriately.

*Legislative enablers*

- High quality planning, including sufficient buffers, for waste management and recycling facilities.
- Appropriately structured landfill levies, including levy portability and discounts for levy residuals for scrap processors.
- Mandatory positive procurement by government bodies for key recycled materials; paper, plastics, construction materials, compost and renewable energy.