



30 July 2018

Port Phillip EcoCentre Submission re: Draft Waste Management Strategy 2018-2028

Dear Jorja,

Since 1999, the Port Phillip EcoCentre works proudly as a community partner to City of Port Phillip, activating citizens to cultivate long term social and environmental wellbeing.

We conduct an award-winning range of grassroots action, education and research relating to waste and litter elimination; and are members of the Victorian Litter Action Alliance and MWRRG Education and CLEAN Networks. Some of our partnerships to eliminate wastefulness, landfill, pollution and litter include work with EPA Victoria, Sustainability Victoria, Yarra Riverkeeper and Werribee Riverkeeper, Beach Patrol Australia, RMIT University, Tangaroa Blue Foundation, and over 130 schools.

The EcoCentre appreciates the opportunity to provide feedback on City of Port Phillip's **draft Waste Management Strategy 2018-2028**.

We support the first three Outcomes:

- Outcome 1: A City that reduces waste
- Outcome 2: A City that maximises reuse and recycling, *and*
- Outcome 3: A City with clean streets, parks and foreshore

While we shall explain below our strong concerns about the final proposed Outcome:

- Outcome 4: A City that uses new technology to process waste better and reduce environmental impacts

We note that since the release of this draft in June 2018, the Victorian Government has announced a new \$37m Recycling Industry Strategic Plan, including:

- Deliver a three year statewide education campaign about recycling effectively
- Develop end-markets for recycled materials (including State Govt procurement)
- Writing a *Circular Economy Policy* by 2020

Where possible, our submission considers the broad initiatives of the Plan; and we urge City of Port Phillip Officers to specifically explain if and how Victoria's Plan impacts elements of *Don't Waste It*.

Feedback

1. **Define "waste" legally versus "waste" in common language; this Strategy uses it both ways.** Given this is a community document, articulate the two ways the Strategy uses the word "waste." While the Environmental Protection Act 1993 gives a technical (and broad) definition to the word waste that governments must adhere to, there is also a common meaning of the word that will play a critical role in reducing our per capita landfill, litter, emissions and other related metrics. This is the use of the word

“waste” to refer to resources squandered unnecessarily through excess consumption, miscalculation or mismanagement.

Community are central to the elimination of this sort of waste, achieved through education and behavior change to accelerate the higher waste hierarchy actions, and reduce the volume of streams that local governments must manage through resource recovery or landfill.

2. **Relatedly, any Council concerned with the economic and health risks of climate change must understand that it is ecologically critical that Victorians reduce our overall consumption.** The eco-footprint of the average Victorian is 2.5x the planet’s regenerative capacity (EPA Victoria 2008). This is a dangerous misalignment that will eventually cost Councils in numerous ways. In contemporary times, any Waste Management Strategy is compelled to acknowledge and address this, through a range of mechanisms to advance a more circular economy inherently built around regenerative/renewable reuse and recycling. (Advanced Waste Treatment is not sufficiently regenerative - point 7 below.) This Strategy includes excellent actions such as
 - a. *ACTION 3 – We will promote a reduction of single use plastics*
 - b. *ACTION 5 – We will advocate to government to ban use of non-recyclable items and packaging*
 - c. *ACTION 11 – We will make sure Council purchasing practices prioritise the use of recycled and recyclable products*

However, there is no strong underpinning statement of our overall need to reduce/realign consumption with planetary resources; a strong part of which can be described by the principle of Zero Waste and a Circular Economy: ‘looking beyond the current “take, make and dispose” extractive industrial model, the circular economy is restorative and regenerative by design.’ (www.ellenmacarthurfoundation.org/circular-economy)

Victoria’s Recycling Industry Strategic Plan signals the state’s intention to move toward such principles through policy by 2020, during the early stages of the 2018-2028 Strategy. The EU has already strategised significantly and has 10 success indicators, mostly relevant at the LGA scale for considering points of advocacy and future nested strategy with Victoria: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1516265440535&uri=COM:2018:29:FIN>

3. **Clarify how the waste hierarchy guides this Strategy’s resourcing.** While Australia’s commonly-used waste hierarchy (p17 of draft Strategy) illustrates that Avoidance and Reuse are priority, there is no clarity whether the investment for 2018-2028 will be weighted accordingly. Appendix 1 lists only the aggregate investment.
4. **Include clean waterways.** For Outcome 3, we acknowledge that the direct management of Port Phillip’s waterways involves Parks Victoria, DELWP, and Melbourne Water as well as upstream municipalities. However, Albert Park Lake, Elster Creek and 11.6km of Port Phillip Bay are central to the character of City of Port Phillip. Research shows that 95% of pollution in the Bay comes from the land

catchment; and that preventing plastics and other pollution from waterways is more effective than removal from waterways. We therefore recommend that the Outcome is written as *A City with clean streets, parks, waterways and foreshore.*

5. **Why two contexts of statistical comparison?** Is there a specific reason that *Where we are now* uses Metro Melbourne stats in some places and Victorian stats in others, e.g. limited data availability? City of Port Phillip is presumably most “apples to apples” comparison with other metropolitan councils.
6. **The summary of current services is useful.** The *Our Current Services* is important for community understand the range of services currently offered. Our staff once heard a Council Officer say that City of Port Phillip has waste and litter services on the go 20 hours per day. If this is true, it is a strong fact to include for readers to understand how much CoPP does! It also may be useful to note that there is a complementary education investment in the Sustainable City Community Action Plan.
7. **Like many environmental groups worldwide, we harbour extreme concerns about Waste to Energy (WTE) schemes, which in this plan are grouped under ‘Advanced Waste Treatment’ and taken nearly as a foregone conclusion for Port Phillip’s future.** Advanced Waste Treatment/WTE is an industrial rebrand of toxic incinerators – all the technology variants are defined as waste incineration by the US EPA and European Union. They add one extra use before cannibalising materials, and generally create significant pollution risk.
 - We assume that the potential Advanced Waste Treatment is for municipal mixed waste. ‘Mixed waste’ includes our domestic and small business garbage that includes plastics, household chemicals and organic materials.
 - There is no thermal process to capture the embodied energy value of mixed waste that will not create significant toxic risks. (Boomerang Alliance Waste To Energy Policy 2018)
 - The calorific value of mixed waste is low, with one estimate (CEFC 2016) calculating if Australia incinerated all of the ‘feasible waste’ it would generate about 2% of electricity needs.
 - “Thermal technologies have had no *fundamental* design changes since the 1960s” (National Toxics Network, Australia 2013) and have a greenhouse emissions profile equivalent to burning coal (US EPA 2014). New York State compared emissions profiles and found that WTE produced 14x the amount of mercury as an equivalent coal plant, and more lead and cadmium.
 - Thermal processes rely on ‘reliable waste volumes over long periods to justify investment, consequently locking up (and using only once) resources that could be repeatedly recycled in the circular economy’ (Boomerang Alliance)
 - The focus on ‘diversion from landfill’ is an inappropriate metric – we should be setting targets for recycling of recovered waste.
 - The EU Circular Economy Plan (January 2018) cites mixed waste WTE as no better than landfill.
 - Gayle Sloan from the Waste Management Association of Australia (WMAA) says that if the technology detracts from a focus on reusing and recycling

resources, then it is doing us a disservice. "It's one of the lowest options on the hierarchy, as in it's the last resort before landfill. Once you've burnt it, it's gone. You don't get that resource back."

Lastly, we include an excerpt from the Executive Summary of a 2013 Australian report from National Toxics Network 'Burning waste for energy: It doesn't stack up' which makes several points applicable to the selection and priority of actions and advocacy within City of Port Phillip's Waste Management Strategy:

"This report recommends that Australian state and federal governments reject waste incineration and adopt a national policy for enhanced waste avoidance and resource recovery that includes:

1. Support and incentives for 'cool' technologies such as composting and anaerobic digestion.
2. The adoption of zero waste principles in legislation.
3. Increased support for an expanded recycling and composting sector.
4. National Container Deposit and Extended Producer Responsibility legislation that mandates product recycling.
5. Promotion of better industrial design to drive elimination of non-recyclable 'residuals' from the waste stream.
6. A review and removal of clauses in the Renewable Energy (Electricity) Act 2000 that deem any aspect of waste burning for electricity generation 'renewable energy' which allows municipal waste burners to access credits, subsidies or certificates for renewable energy generation depriving genuine renewable energy projects of much needed resources.
7. Amendment of any other legislation, regulations or schemes to remove subsidies, benefits and incentives for waste incineration that would otherwise be directed to carbon-free renewable energy sources.

The EcoCentre is committed to transformative collaborations that achieve overall waste elimination at all systemic levels, from community to businesses, from design standards to land management and enforcement.

Please do not hesitate to contact me with any questions. The EcoCentre looks forward to partnering with Council as a leader in eliminating wastefulness, landfill, pollution and litter, while maximising the recycling of (and market for) recovered material over the next decade.

Yours sincerely,



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