



Institute of  
Public Works  
Engineering  
Australia

**THE INSTITUTE OF PUBLIC WORKS ENGINEERING AUSTRALIA  
(VICTORIA DIVISION) PTY LTD**

**SUBMISSION**

**TO**

**RESPONSE TO WASTE POLICY REVIEW DISCUSSION PAPER**

**4<sup>th</sup> MAY, 2012**

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## **1.0 INTRODUCTION**

The Institute of Public Works Engineering Australia (Victoria Division) Pty Ltd wishes to thank the Minister for Environment and officers of Department of Sustainability and Environment, Sustainability Victoria and Environment Protect Authority in providing the opportunity to provide input into the Waste Policy Review Discussion Paper.

## **2.0 ABOUT IPWEA (Vic)**

The Institute of Public Works Engineering Australia (Victoria Division) Pty Ltd (IPWEA (Vic)) is a professional body which represents public works practitioners including public works engineers across Victoria. IPWEA (Vic) has existed in Victoria for some 40 years and was formally the Local Government Engineers Association. IPWEA (Vic) has in excess of 400 Local Government Engineers as members across Victoria, plus many other public works practitioners monitoring activities and attending events.

This submission is made after seeking comment from our membership.

## **3.0 DOMESTIC WASTE AND LOCAL GOVERNMENT**

Local Government has a long standing statutory responsibility for collecting household waste and, as such, has for generations managed domestic waste collection and disposal systems. Councils have not generally taken responsibility for commercial and industrial waste collection although have been a recipient of these materials at council landfills.

### **3.1 Waste Collection**

Under present arrangements each council is responsible for their own collection and disposal requirements. Local Government has developed a range of tailored waste collection approaches to suit their communities. The disposal system adopted is dependent on the volume of waste and capacity of the municipality to develop the expensive and sophisticated landfill and recycling operations. All councils have embraced recycling and implemented a range of measures to collect recyclables or divert recyclables from landfill. The opportunity to have a regional waste collection service has not been embraced, although considered. The benefits of a larger scale multi municipality contract may well be out-weighted by the disadvantage of concentration of contracting to a small number of large operators, excluding local operators, reducing flexibility in delivery of services by each council.

### **3.2 Review of Types of Waste Collected**

Q 15, 21, 29

Local Government collection of domestic waste is a long standing service offered to residents. Domestic waste services began as a single bin service and have progressed to a multiple bin service with general waste and recyclables and most councils providing green waste collection. Around 50 percent of the domestic waste in the general waste bin is kitchen waste. Personal composting bins and worm farms are well established methods of disposing of domestic kitchen waste at source. Perhaps the collection of the general waste is too convenient and working to discourage self reliance. A greater effort to encourage home recycling of kitchen waste is warranted. This may be encouraged by increased waste charges, regulation or through better education of the community.

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Perhaps current waste services are reflective of the throw away society and we need to build the communities support to be part of the solution. Landfill levies could be directed to targeted advertising.

Product stewardship is another opportunity that has been discussed widely. Its introduction is reliant on state government leadership as it is beyond the powers of Local Government to implement.

### **3.3 Reform of Regional Waste Groups**

Q 15,19,21,29

Councils work collectively through their respective Regional Waste Groups. Here they share initiatives, compare service models and work together where feasible. Possibly more could be done regionally.

The role of Regional Waste Groups should be further investigated. While they provide a useful opportunity for councils to share information, their overall value requires investigation with the stakeholders.

### **3.4 Zero Waste to Landfill**

Q 15,19,21

Local Government is committed to the zero waste to landfill philosophy and does what it can within its influence to achieve greater recycling of products. Domestic waste recycling by Local Government is a success story and should be celebrated. Recycling of Commercial and Industrial and Construction and Demolition is not managed by Local Government and remains the real cause of recyclables going to landfill.

State Government must use its capacity to influence and legislate to resolve this significant problem.

### **3.5 Complex Government Regulation**

Q 15,19,21,23,27,28

Government regulation, with ever increasing Environment Protection Authority (EPA) requirements, is discouraging many councils to remain in the landfill business. Councils must deal with the waste they collect and when a local landfill is closed, often councils have to truck waste long distances and in some instances interstate.

One might question the environmental impact of trucking waste long distances.

The need for environmental regulation is not questioned, however, the total environmental and community impact when determining solutions must be weighed up.

For “zero waste to landfill” to be achieved there is a need for the development of the collection and sorting industries. Green waste remains a major problem. Composting is a viable means to manage green waste. State Environment Protection Policy (SEPP) air quality standards are stringent and possibly unworkable for composting facilities. The SEPP should be examined to determine if it is unreasonably stringent.

Under the Planning and Environment Act 1987, while a composting facility can be established in a Farming Zone, council green waste is prohibited from being treated on land in the Farming Zone because it is defined as industrial waste. Such definitions within the Planning Schemes should be reviewed as should EPA controls.

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There needs to be a whole of Government approach to foster recycling and Farming Zones may well be the appropriate zoning.

### **3.6 Landfill Levy**

Q 15,19,21,22

The landfill levy has become a blunt instrument of State Government to make landfill tipping more expensive and has become a means to fund government agencies including Sustainability Victoria and the EPA. Regional Waste Groups have sufficient funding to exist, but insufficient funding to achieve much more than being a forum and local watchdog. Grants for studies are generally small.

The landfill levy should be put to strategic use rather than as a funding source for government agencies. Such uses would include community education, subsidising the introduction of new technology and funding in-depth studies for the implementation of new technology. Returning more of the landfill levy to Regional Waste Groups/corporations and councils to fund development of the waste systems.

### **3.7 Commercial and Industrial and Construction and Demolition Waste**

Q 15,19,22,23

Councils operating landfills have all experienced large quantities of Commercial and Industrial Waste (C&I) that is largely recyclable, going to landfill. Regional Waste Groups and Local Government has no regulatory control over these industries.

Section 13 cd) of the Environment Protection Act 1970 would appear to give the EPA responsibility to engage and encourage industry to recycle. Currently the observed role of EPA is an environmental policeman. That role is not questioned, but it does conflict with the need for government to support and encourage industry to recycle as outlined in the Act. Product stewardship by the Commercial industry is long overdue.

C& I and C&D waste represents 70% of the total waste stream. Regulation of the disposal of this waste is long overdue.

### **3.8 New Technology, Recycling, Composting and Innovative Waste Processes**

15,19, 21,22

New technology for waste recycling and disposal requires large throughput volumes, considerable investigation, capital investment and considerable planning and environmental controls. It is likely that such industries cannot be established without some form of subsidies and support.

Currently, each council or Regional Waste Group is left to its own devices to investigate options and to try to attract industries. The usual outcome is insufficient volume of material or the capital risk prevents the industry proceeding.

Waste disposal, like transportation systems, may require subsidy to operate. It is only with the industries being established that the unit costs may be driven down as operators and regulators become more experienced.

There is a role for government in undertaking the investigations on behalf of regions rather than smaller scale individual studies being undertaken. It would be a legitimate

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use of the landfill levy to fund studies and support the establishment of recycling and disposal industries.

### 3.9 **Community Education**

Q 15, 23

Without community support it will be difficult to progress zero waste to landfill.

Councils struggle with the problem of contamination of recyclables by residents with items such as dirty nappies. This often causes recyclables to go to landfill or high penalties being applied to councils to manually sort the recyclables.

Education is another legitimate use of the millions of dollars collected from Local Government in landfill charges.

### 3.10 **Government Leadership**

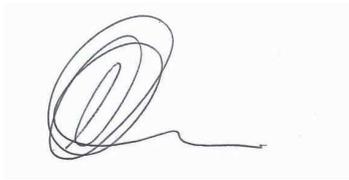
15,19, 21, 25,31

Waste is a national problem and each state is grappling with the same issues. There seems an opportunity for national leadership and adoption of a single national approach. For example, South Australia does not allow plastic rubbish bags and has deposits on drink containers. The community does not understand why, what is simple and accepted practice in one state, has so many problems being introduced in another state. The matter of a national approach for waste management should be a multi lateral government approach.

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## **4.0 RECOMMENDATIONS**

- 4.1 The landfill levy should be put to strategic use rather than as a funding source for government agencies. Such uses would include community education, subsidising the introduction of new technology and funding in-depth studies for the implementation of new technology. Returning more of the landfill levy to Regional Waste Groups/corporations and councils to fund development of the waste systems;**
- 4.2 Introduce deposit container legislation and other forms of product stewardship;**
- 4.3 Develop a national approach for domestic, commercial and industrial and construction and demolition waste;**
- 4.4 The benefit and role of Regional Waste Groups needs to be re-examined by stakeholders;**
- 4.5 Celebrate the success already achieved by Local Government in recycling;**
- 4.6 The State Government must use its capacity to influence and legislate to resolve the problem of significant volumes of commercial and industrial and construction and demolition waste going to landfill;**
- 4.7 Develop a whole of government approach to regulation of recycling so that new industries are not closed by over regulation by planning and environmental controls. This may require a review of the current SEPP Air Quality Standards and modification to the Planning Scheme including the definitions for the Farming Zone;**
- 4.8 Government leadership by supporting the introduction of new technologies by providing financial subsidies to ensure the industries can be established and operate;**
- 4.9 A fresh approach to what waste is being collected from properties and if the community can assist in the reduction of waste going to landfill. The need for community education is ongoing, should be state wide and could be legitimately funded from the landfill levy.**



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