

7.4.4 CITY OF MONASH SUBMISSION TO SETTING THE STANDARD FOR BETTER RECYCLING AT HOME - ENGAGE VICTORIA

Responsible Manager:	Kristy Green, Manager Sustainable Monash
Responsible Director:	Jarrod Doake, Director City Services

RECOMMENDATION

That Council endorses the attached submission to the DEECA Service Standards Engagement and supports suggested changes to the proposed standards.

INTRODUCTION

The Department of Energy, Environment and Climate Action (DEECA) is working with councils and Alpine Resorts Victoria (ARV) in rolling out Victoria’s new standardised four-stream household waste and recycling system.

The City of Monash has developed a submission to respond via Engagement Victoria to “Setting the standard for better recycling at home.”

COUNCIL PLAN STRATEGIC OBJECTIVES

Sustainable City

Ensure an economically, socially, and environmentally sustainable municipality.

Work with the community towards a zero waste future, actively increasing reuse and recycling.

BACKGROUND

Households that receive waste and recycling services from local councils and ARV are proposed to have access to separate services for:

- general rubbish
- mixed recycling
- glass recycling
- food organics and garden organics (FOGO).

Household waste and recycling services are proposed to be regulated by Recycling Victoria through regulations and a service standard established under the Circular Economy (Waste Reduction and Recycling) Act 2021.

The proposed regulations specify when councils and ARV are to provide the four services. They also provide general auditor and infringement provisions for Recycling Victoria.

Victorians, local councils, ARV, and the waste, recycling, and resource recovery sector have been invited to have their say on the proposed regulations, service standard and Regulatory Impact Statement (RIS).

The engagement closes on 14th August and submissions can be made by individuals or organisations. [Setting the standard for better recycling at home | Engage Victoria](#)

The suggested changes to the proposed standards include, but are not limited to -

1. Certified Compostable plastic caddy liners should be included in the acceptable items list for FOGO bins.
2. The glass bin roll out should be delayed to 2030, and more work should be done to provide evidence of its necessity.
3. The state government should be taking a truly circular approach, with more focus on upstream waste creation and making manufacturers financially responsible for waste disposal costs for unnecessary packaging.

DISCUSSION

Council submission is contained in Attachment 1.

FINANCIAL IMPLICATIONS

There are no financial implications to this report.

POLICY IMPLICATIONS

There are no policy implications to this report.

CONSULTATION

Community consultation was not required.

SOCIAL IMPLICATIONS

There are no social implications to this report.

HUMAN RIGHTS CONSIDERATIONS

There are no human rights implications to this report.

GENDER IMPACT ASSESSMENT

A GIA was not completed because this agenda item is not a 'policy', 'program' or 'service'.



CONCLUSION

The City of Monash has developed a submission highlighting multiple issues in the proposed standards and approach.

ATTACHMENT LIST

1. Service standard - survey questions for Engage Victoria Monash [7.4.4.1 - 7 pages]

Engage Victoria – Survey Questions

Identifying questions

[1] Are you making a submission as an individual or on behalf of an organisation?

Organisation

[2] Your name

City of Monash

[3] A local council or Alpine Resorts Victoria

[4] mail@monash.vic.gov.au

[5] Do you wish for your submission to remain anonymous? No

Proposed Circular Economy (Waste Reduction and Recycling) (Mandatory Service Provision and Other Matters) Regulations 2024

The proposed regulations prescribe dates on and from when councils and Alpine Resorts Victoria must provide the four-stream services.

The four-stream waste and recycling services are:

- general rubbish
- mixed recycling
- glass recycling, and
- food organics and garden organics (FOGO).

The proposed regulations also outline other matters relating to auditors and infringement offences.

[6] Do you support the commencement date of 1 July 2027 for the mandatory provision of all four service streams by councils and Alpine Resorts Victoria?

- Yes
- **No**

[6A]

[6B] [Where Question 6 answered 'No'] Which option would be more appropriate?

- ~~2025 for all four services.~~
- 2027 for glass services and 2030 for FOGO services (the base case)

[6C] [Where Question 5 answered 'No'] Please provide further details on why you consider this option more appropriate.

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The commencement date of 1 July 2027 for glass is only feasible if there is enough supply of local recycled content, Australian made bins to supply all of the Victorian Councils rolling out new services. It is our understanding that there are only 2 manufacturers in this market, who are not using local recycled content plastic (using imported recycled plastic instead), and the regulations should be allowing sufficient time for this manufacturing improvement to align with the Circular Economy Act and ambitions to use locally sourced recycled content plastic in bins. A better target for the glass roll out would be 2030, if supported by evidence-based data that this service is necessary post CDS implementation, and that it is beneficial for ratepayers.

[7] Do you have any comments regarding the infringement or auditor provisions of the proposed regulations? (See Part 3 of the proposed regulations.)

[8] Do you have any other comments on the proposed regulations?

Proposed Household Waste and Recycling Service Standard

The proposed service standard outlines the acceptable service arrangements, including

- the approach to kerbside or drop-off services
- **consistent standard contents lists** that describe what materials can be placed into each waste and recycling stream, and
- consistent colours for each stream in relation to bin lids, labelling and signage.

[9] Do you support the commencement date of 1 July 2027 for the service standard under section 62 of the Circular Economy Act?

- Yes
- **No**

[9A] [Where Question 9 answered 'Yes'] Please provide further details on your response.

[9B] [Where Question 9 answered 'No'] Which option in the RIS do you think would be more appropriate:

- 2025 for all four services.
- **2027 for glass services and 2030 for FOGO services (the base case)**

[9C] Please provide further details on why you consider that option more appropriate.

The commencement date of 1 July 2027 is only feasible if there is enough supply of recycled content Australian made bins to supply all of the Victorian Councils rolling out new services.

[10] Do you agree with the proposed acceptable service arrangements for FOGO? (See section 2.1.2 of the proposed service standard.)

- Strongly agree
- Agree
- Neither agree nor disagree

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- Disagree
- Strongly disagree

[10A] Please explain your answer.

Reviewing assessments at least once every 3 years would become a resource imposition. Monash Council has several multi-unit dwellings receiving a private service due to the building's design having insufficient onsite space for bin infrastructure, which is stipulated on their planning permit. The exemption should be extended to insufficient space to store bins for collection on the nature strip. Drop off services are more likely to be contaminated, require resources to manage and require public space that is not available.

[11] Do you agree with the proposed acceptable service arrangements for kerbside collection? (See section 2.2 of the proposed service standard.)

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

[11A] Please explain your answer

Please refer to comment about suitable space for collection of bins on public land.

[12] Do you agree with councils and Alpine Resorts Victoria being required to provide households with an option to opt-out of a FOGO kerbside collection service? (See section 2.2.3 of the proposed service standard.)

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

[12A] Please explain your answer.

Allowing households to opt-out of the FOGO service provides a resource burden on Councils to manage inspections and audits. Councils should be able to opt-out households that demonstrate repeated misuse of the bin (high contamination) where the Council has provided assistance to educate, and no change occurs. There should also be an option to opt out of glass and recycling bins for repeated misuse.

[13] Do you agree with the proposed acceptable service arrangements for drop-off services? (See section 2.3 of the proposed service standard.)

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree

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- Strongly disagree

[13A] Please explain your answer

Drop off services are more likely to have increased contamination, require resources to manage and require public space to site which is not available.

[14] Do you agree with the standard content lists for each waste and recycling stream? (See section 2.4 of the proposed service standard.)

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

[14A] Please explain your answer.

The aim of the standard list is to standardise the contents of the four-stream system across the State. The inclusion of soft plastics for Councils with an offtake arrangement negates the purpose of the statewide standard lists and creates confusion and inconsistencies across Victoria. It prohibits the ability for State-wide communications, a request Monash Council has made to the State for over a decade. The aim of the regulations (and Circular Economy Act) should be employing the top principle of the Circular Economy which is to design out and eliminate waste. Regarding soft plastics, all unnecessary and excessive soft plastic packaging should be designed out of consumer goods and food, to first eliminate waste. Previous soft plastics trials across Victoria found that up to 50% of soft plastic in the kerbside bin was not placed in the required bag, which ended up as contamination in the paper stream. Likewise, the reliance on Councils providing plastic bags to residents to capture soft plastic in the mixed recycling stream creates a cost imposition on councils and their ratepayers, and a barrier to compliance with use, while creating more plastic waste. The proposed Australian Food and Grocery Council kerbside soft plastics recycling scheme does not pay collectors (Councils) or contractors to collect and sort this material. The establishment of the scheme will also disincentive the phasing out of soft plastic as packaging, which are ubiquitous and excessive, by manufacturers and importers. Supermarkets should be made responsible for providing a soft plastics collection and recycling service, as this would incentivise them to encourage manufacturers to reduce soft plastic packaging, and the stream would remain cleaner as people are more conscious of waste that they are transporting themselves.

The inclusion of tetra pak and mixed material long life drink containers is questionable given there is no recycler based in Victoria to process this material, and the recyclers of this material into Save board do not have secure end markets for the recycled material. The aim of the regulations (and Circular Economy Act) should be prioritising elimination of this problematic and mixed material packaging, and the manufacturers should be prioritising reuse or packaging made from easily and accessibly recycled materials.

The exclusion of certified compostable liners from the accepted list will make it harder for Victorians to divert food waste from landfill and will result in unintended consequences for the

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compost quality. Currently, consumers are left confused by the greenwashing of online and supermarket products which claim to be “green” or “eco” and are placed on the shelf to appear like for like with compostable products. The State Government should extend the plastic bag ban to include all non-compostable bags/liners unless clearly marketed (for general rubbish only). The manufacturers of these products will continue to stock these products in Victorian supermarkets (given they are acceptable in all other States with FOGO) and products will be purchased online as they appear to be compliant and cheaper (and will continue to be available). Only if these products are banned will people stop using them to collect and store food scraps. Evidence has shown that the use of compostable liners increases the use of FOGO, leading to a high performing system. Monash Council strongly supports the continued acceptance of certified compostable plastic liners in the FOGO stream. If paper liners are accepted instead of compostable liners, consumers will use whatever paper product than can acquire cheaply (or freely) to wrap food waste. This will include compostable paper (not accepted) and which has been found to contain dangerous levels of PFAS.

Tea bags should be in the included list for FOGO. Tea bags are a very common item consumed multiple times a day in households that drink tea. Banning tea bags excludes a very common practice from being part of the routine of placing food waste into a kitchen caddy. Tea bags (paper only) should be included (remove label) and non-paper tea bags should be phased out (adding to the single use plastic ban as an unnecessary plastic with a readily available alternative).

Cordial bottles should be in the included list for mixed recycling as industry has indicated they are changing the plastic type used in bottle manufacturing away from a problematic plastic to a easily recycled plastic type.

Plastic meat trays should be included in the acceptable list for mixed recycling as they can currently be accepted by Visy and the alternative (compostable packaging) must go to landfill. The list should prioritise the inclusion of material types that can be easily recyclable.

The proposed service standard relies too heavily on education as the tool to change the behaviour of millions of Victorians, when education cannot be funded through the waste charge. The proposed standards are out of line with the standard lists of NSW and other states and will create non-standardisation for border towns and people moving between states.

[15] Do you have any other comments regarding the proposed service standard?

Please make transparent to Councils and the community the data used to determine the list of included and excluded items (from a high performing service perspective, i.e. high participation and low contamination). The service standards should be based on data to drive high performing systems and should not overly rely on ongoing expensive education (Which on its own, is not effective unless delivered comprehensively over years with supporting legislation, funding and regulation) of millions of Victorians in place of requiring industry to adapt to available technological solutions to overcoming widespread barriers.

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The standards need to include public place recycling bins, to ensure recycling away from home is also consistent. The standards need to include and match the Australian standards for visually impaired community members, so the shapes placed on bins are consistent.

The ARL (Australian Recycling Label) should be reformed to only show packaging can be recycled easily across Australia, rather than including products that are questionable and not accepted by most recyclers (e.g. toothpaste, chocolate bar wrappers). Currently the ARL does not support Victorian-based consumers to make informed purchasing decisions as it is often incorrect, leading to recycling bin contamination.

We do not support the need for a separate standard kerbside glass recycling service in Victoria, given that we have a container deposit scheme in place, which is likely to expand to include more glass containers than currently accepted (based on other states). Recycling Victoria should share the data behind the decision to introduce glass and Councils that have implemented glass services. The cost to procure bins, contract collection, educate the community and reduce contamination is an ongoing cost imposition on Councils to deliver, and the benefits to residents are unknown.

The Small Acts Big Impact statewide campaign needs more input from Councils to ensure messaging is correct and based on behaviour change concepts. The current campaign mentions putting “glass” and “metal” into the mixed recycling bin without specifying packaging forms, which could lead to people putting windowpanes and metal building materials into the mixed recycling bin.

The time frame for consultation on the service standards did not provide Councils enough time for true community consultation. Ideally this would be extended by a further 2 months to publish the consultation in Councils communication avenues, and allow for feedback from community groups that may meet only monthly or every other month.

Regulatory Impact Statement

The Regulatory Impact Statement outlines the range of regulatory options considered to help Victoria set the standard for better recycling at home, as well as assessing the impacts of each option.

A multi-criteria analysis was used to assess and consider the costs and benefits of each option.

The analysis and broader context describe why the Victorian Government’s proposed regulations and service standard are the preferred option.

[16] Do you support ‘Option 4 – 2027 commencement with kerbside services where reasonably practicable’ as the preferred option? (see Chapter 5 of the Regulatory Impact Statement.)

- Yes
- No

[16A] Please explain your answer.

[17] Do you have any other comments on the Regulatory Impact Statement?

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City of Monash would like to see the state government taking a truly circular approach, by supporting the community through more focus on upstream waste creation. Manufacturers creating unnecessary waste should be made financially responsible for its disposal and be held to account for the packaging choices they are making. More regulation at the source would be a much more effective and realistic way to reduce waste and support a healthy recycling system. Regulation around the inclusion of recycled materials in manufacturing and building and construction will create innovation and end markets for end-of-life materials. More thought needs to go into investing in recycling facilities, with more of a focus on facilities that produce products that fill an existing market gap.

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