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CITY OF MELBOURNE

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Dear Rob

SUBMISSIONS TO THE DRAFT METROPOLITAN WASTE AND RESOURCE RECOVERY STRATEGIC PLAN

On behalf of the City of Melbourne, thank you for the opportunity to comment on the draft Metropolitan Waste and Resource Recovery Strategic Plan. A submission is attached using the template as requested.

If you require further information about our submission please contact Melanie Oke, Waste Management Coordinator on 03 9658 9951.

Yours sincerely

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Confidentiality: This submission is to remain confidential.

Overall comments

We support the development of the Metropolitan Waste and Resource Recovery Strategic Plan and the work that the Metropolitan Waste Management Group does to assist councils to improve waste management. We have particularly appreciated the funding support that has been provided by MWMG in recent years which has assisted us to undertake a number of important projects.

Part One: Metropolitan Plan

1. infrastructure and service priorities for metropolitan Melbourne

The discussion of waste infrastructure should include infrastructure within buildings or residential developments, such as garbage chutes and bin areas within high rise buildings and compactors and balers within large residential, mixed use or commercial sites. Future infrastructure may include underground vacuum waste collection systems. Part one would benefit from an acknowledgement of the importance of this pre-collection infrastructure and identification of actions to improve planning for this type of infrastructure.

The emergence of small scale processing infrastructure for organic waste in the C&I sector is an important and growing trend. The 'early adopters' such as Silo by Joost and Cecconi's Cantina are leading the way by installing this technology at their own cost. The number and type of machines that are available will surely increase greatly over the next few years. Councils and the commercial sector would benefit from independent information as to the costs and benefits of such technology.

The notion of Councils and private grouping together to create economies of scale and risk sharing for any new Alternative Resource Recovery Technology needs to be investigated. History shows that there is potential to partner with other sources of waste (especially where tonnes are consistent and make-up of the material is homogenous) to build a good business case to build a new plant.

2. Current waste types and tonnages being generated and managed across Melbourne (section 5)

Table 1.1 outlines the solid waste infrastructure in metropolitan Melbourne. We note the following in regards to this table:

- Municipal kerbside collections – may also include period organics collections
- Commercial collections – it is not only the layout of high density residential units that preclude the use of municipal bins. Some councils have a policy of not providing services to multi-unit developments. For many councils the economies of scale don't exist to provide a high-density MUD service due to the resourcing required such as rear-lift vehicles.

- Transfer stations etc – these may include collections of e-waste and a much broader range of items and materials than is suggested

Table 1.2 outlines the roles of various industry participants. Under 'Local governments' it should be noted that the education programs are not just targeted towards the community but often focus on businesses as well. Also, in addition to the strategic land use planning role, local governments must assess the need for waste services as part of the statutory planning process for new developments. Waste management planning is needed for individual developments, both commercial and residential, to ensure that all residents and businesses have access to waste systems that encourage them to recycle their waste. For example, City of Melbourne's Guidelines for Preparing a Waste Management Plan state that a developer must ensure that it is as easy to dispose of each type of recyclable material as it is garbage. Also, new developments may provide an opportunity to implement innovative waste systems such as the automated waste system being implemented in Sydney's Green Square development. The role of local governments in providing guidance and of setting the requirements for waste management within new developments should be acknowledged in addition to the land use planning role.

The draft plan notes on page 20 that the Victorian Government has identified the need to move away from the waste sector approach (municipal solid waste, commercial and industrial waste and construction and demolition waste) towards a new focus on materials streams. On page 22 the draft notes that Sustainability Victoria has developed a material stream classification system to replace the sector approach. While the materials stream approach may be useful when considering market development and processing infrastructure needs, it does not assist in understanding the provision of collection services. We do not support the replacement of the sector approach with a focus on material streams. Both approaches should be used to gain a complete understanding of waste management needs.

Table 1.3 identifies the components of the municipal waste stream. Material collected from public place recycling and litter bins and the waste from municipal operations such as street sweeping should also be included in this table as they are two key sources of municipal waste. We also note the following about this table:

- Commingled recyclables – dot point three notes that these items "need to be sorted after collection so they can be recycled (ie not source separated)". This is misleading because the separation of materials at the household into the garbage and commingled recycling bin is referred to as source separation. The reference in brackets should be removed.
- Garden organics waste – collection also includes on-demand pick-ups by councils


Table 1.5 shows the predominant source sectors of each material stream. The source sectors for glass should include C&I as the hospitality sector produces a large amount of this material.

Section 5.3.2 sets out the waste tonnages managed in metropolitan Melbourne in 2010-11.

Figure 1.4 shows how metropolitan MSW is collected. It is unclear whether this graph includes hard waste. This should be clarified.

Figure 1.5 is interesting because it appears that no food waste was recovered in 2010-11.

Figures 1.7 and 1.8 (C&I waste) and 1.9 and 1.10 (C&D waste) are inconsistent in that the overall waste managed is given for Victoria but recovery is given for metropolitan Melbourne. Also, the amount of residual material for each of these sectors is not shown. This means that it isn't possible to see what is going to landfill and therefore what the main opportunities are for increasing recovery.



There does not seem to be an acknowledgement of the operations of food recovery organisations such as Fare Share or Second Bite. These operations may not be within the scope of the Plan because they are focused on reuse rather than disposal or recovery. However, the role that they play is important in reducing waste to landfill and should be acknowledged.

3. Factors influencing future waste generation (Section 6)

There are around 40 waste and recycling companies operating within the City of Melbourne. This is important to note because the number of companies and the level of competition between them has a big impact on the commercial and industrial sector, particularly small to medium enterprises. For example, some companies do not encourage recycling and if they do they charge a premium for the service. You note on page 32 that the supply of commercial and industrial organic waste is unreliable in both quality and quantity. This understates the potential for organic waste recovery from the C&I sector. The lack of available services and the cost of those services that are available are a huge barrier to organic waste diversion in this sector. TFM Australia has established a significant waste program at the KPMG building in Collins Street. This is already producing high-quality organics taken to NRS Dandenong.

Page 33 notes that the Victorian Government encourages the development of waste to energy facilities. More support is needed to establish waste to energy facilities that can effectively process the residual material after source separation has occurred.

Section 6.4 discusses both land use planning and the need for planning for multi-unit developments. This section should be given a broader title rather than just 'land use planning', as it clearly recognises more than just land use issues. It is also vital that consideration for multi-unit developments cover not only multi unit but also mixed use. All high rise developments coming into City of Melbourne are a mixture of residential / hotel and retail use. This brings with it very different issues to work through in relation to waste management and large enough volumes to incorporate on site treatment in many cases.

Table 1.6 notes that the landfill levy allows a differential rate for strategic materials such as organics. This may have a big influence on the viability of organics processing technologies and should be explored in more detail.

Part Two: Infrastructure Schedule

Our comments for this part of the document are noted below under each chapter heading.

- **Chapter 11. Resource Recovery in metropolitan Melbourne**


Three questions are raised on page 48 regarding existing and emerging markets and market barriers and failures preventing further recovery. The implementation plan should include an action to research these questions in more detail.

Figure 2.4 shows the projected disposal by material for municipal solid waste. Paper, food, timber and textiles stand out as opportunities for further recovery. The final document should include a similar graph for the commercial and industrial sector, so that opportunities for recovery can be identified for that sector as well.

- **Section 12. Supporting Services for Infrastructure**

We support the inclusion of commercial and industrial organic and residual waste into facilities that are developed through council contracts.

- **Section 13. Collection Services**



Section 13.2 outlines the current situation and future need for residential multi-unit development collections. One gap within this section is that the servicing capability of some councils preclude the provision of systems to service multi-unit and mixed use developments. Our waste contract gives us the option of providing up to 1100L mobile garbage and recycling bins and even includes an option for collection of compactors from high rise buildings. This level of flexibility doesn't seem to be in place in many other councils' contracts and is something that needs to be incorporated at contracts are re-tendered.

Section 13.3 discusses hard waste collections. In developing alternative approaches for hard waste collection, MWMG should investigate the option of working more closely with charities in order to provide advice and assistance to councils to achieve more reuse rather than just focus on recovery.

A method of shared procurement was discussed at one of the workshops. Councils without appropriate resources to expand their service, or without the economies of scale to do so, could become party to other contracts but for specific collections only. For example, servicing of high-rise / high-density dwellings. This could assist councils in expanding their collection service without over-committing on resourcing.

- **Section 15. Organics Processing Infrastructure**

On page 71 it is noted that MWMG will "support inner council clusters, led by the City of Melbourne, to design and implement residual bin organic processing procurement". While we are willing to be involved, we request that MWMG take the lead in this process.

- **Section 16. Materials Recovery Infrastructure and Section 17. Reprocessing Facilities**

While data may be difficult to obtain, it is still important for MWMG to establish whether MRFs and reprocessing facilities have the capacity to meet future demand. MWMG should work with Sustainability Victoria to further investigate this capacity and support expansion where necessary.

- **Section 18. Contingency Planning for Emergency Events**

This section does not seem fully developed. The experience of councils in Queensland needs to be taken into account in developing disaster waste management plans. The development of these plans is a large task and councils may not be resourced to undertake this. It is likely that any disaster would cross council boundaries making individual council planning more difficult.