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30 March 2012

Standing Council on Environment and Water Secretariat
GPO Box 787
CANBERRA ACT 2601

Dear Sir/Madam

**RE: PACKAGING IMPACTS CONSULTATION
REGULATION IMPACT STATEMENT (RIS)**

Yarra Ranges Council is located on Melbourne's eastern fringe, and covers an area of almost 2,500 square kilometres. It is the seventh largest local government area in Melbourne in terms of population size and largest in geographical area. Yarra Ranges can be described as an interface Council, home to over 55 suburbs, townships, and small communities in a mixture of rural and urban areas.

In 2008/09 the Yarra Ranges community developed a shared vision (Vision 2020) to help direct Council's strategic directions and actions. Within this vision the community articulated the desire that in 2020 "the community has embraced a zero waste society" (Vision 2020)

In supporting the community to achieve this aim Council has invested significantly in community and organisational waste management, this includes;

- kerbside recycling and green waste collection,
- school and community waste education,
- street bin recycling (utilising a system whereby all street bin waste is sorted, instead of the traditional two bin system), and
- organisational working groups to imbed best practice waste management at the Civic Centre.

As identified in the RIS local government has the primary responsibility to collect waste, including recyclables, from homes. As a result of the commitment by local governments to refine waste management, at home recycling levels are significantly higher than away from home levels. Yarra Ranges Council collects approximately 18,000 tonnes of recyclable material per annum from kerbside collection.

Yarra Ranges Council also manages the waste streams from street litter bins using a single bin system and sorting the contents. The content of Council's street litter bins is made up of 56% waste to landfill, 27% beverage containers and other recyclables making up the remaining 17%.

Yarra Ranges Council understands two of the key challenges facing the ability for council to increase recycling rates are:

- local facilities to receive a range of recyclable material, and
- the recyclability of waste.

Opportunities to increase recycling rates throughout the Yarra Ranges exist across the horticultural and hospitality industries. Currently, options for these industries are largely cost prohibitive and recyclability of packaging is limited. However, the desire to recycle material by these industries is high.

Council agrees that the key packaging, resource recovery and litter management problems identified in the RIS are consistent with Council's understanding of the issues and Yarra Ranges Council supports the objectives of government action to:

- reduce packaging waste and increase packaging resource recovery, particularly for glass, plastic, steel and aluminium in the commercial, hospitality and institutional sectors (away-from-home)
- reduce the need to landfill recyclable packaging materials, thereby freeing up landfill capacity for non-recyclable materials and avoiding landfill externalities
- reduce the negative amenity, health and environmental impacts of packaging waste and litter in line with community expectations, and
- promote a consistent national approach to regulating packaging, which minimises regulatory complexity, business costs and uncertainty for investment and ensures the efficient operation of businesses operating in a national market.

Since 2008 Council has actively supported container deposit legislation. Council's most recent resolution (April 2011) states that Council;

1. *Writes to the Premier, Mr Ted Baillieu, the Deputy Premier, Mr Peter Ryan and the Minister for Environment and Climate Change, Mr Ryan Smith congratulating them on their previous support for Container Deposit legislation, and urging them to either initiate or support any new bills presented to the Victorian parliament, with copies of that letter sent to the State local upper and lower house members in Yarra Ranges.*
2. *Writes to the federal Parliamentary Secretary for Sustainability and Waste, Senator Don Farrell, urging him to introduce national Container Deposit legislation as a priority, with a copy of that letter to local Federal and Senate members in Yarra Ranges.*
3. *Forward copies of this motion to the MAV, and request that they support any legislation at both the state and federal level.*

Council believes that container deposit legislation will:

Support council by:

- Potential reduction in street, pit, gross pollutant trap cleaning, and street/park bin emptying costs,
- May reduce the need for Council comingled street/park bins to be sorted,

- Estimated savings on kerbside recycling due to increased value of containers that remain in bins,
- Litter reduction in parks and gardens, and townships

And support the community by:

- Potential income for community fund raising groups
- Potential income for individuals
- Greater incentive for recycling to be adopted by hospitality industry, events and festivals, etc

However, Council also understands that a CDS can only manage beverage containers and the RIS provides options to address the broader issue of consumer packaging (as defined in the NEPM).

As such, Council supports Option 4(b): Hybrid CDS **and** Option 2(c): Extended Packaging Stewardship or Option 3: Mandatory Advance Disposal Fee to run concurrently.

Option 4(b): Hybrid CDS will provide the best mechanism to 'close the loop' on the recycling of beverage containers as it provides a mechanism to change the behavior of consumers. The other options do not provide the 'tipping point' for change, instead they promote more of the same; educational activities, increased number of street bins, volunteer litter pick up and enforcement activities.

Either Option 2(c): Extended Packaging Stewardship **or** Option 3: Mandatory Advance Disposal Fee could both be utilised to influence packaging at the start of the lifecycle where Option 4(b) can not. It also provides the ability to influence other types of packaging which are recyclable or could be recycled if the appropriate materials/design is used.

This 'package' provides the best suite of actions to address key packaging, resource recovery and litter management problems identified in the RIS.

Yarra Ranges Council is in a good position to support the community to make the most out of improvements to systems and processes to increase the recycling rate in the municipality.

Should you require any further information please contact Rachel Murphy, Sustainable Resources Coordinator on (03) 9294 6392.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Harper', with a long horizontal flourish extending to the right.

David Harper
Manager, Environment Department

