

Submission on *Beyond WAste 2030 – Western Australia’s Waste Avoidance and Resource Recovery Strategy 2030*

December 2025

About WALGA

The Western Australian Local Government Association (WALGA) is an independent, member-based, not for profit organisation representing and supporting the WA Local Government sector. Our membership includes all 139 Local Governments in the State.

WALGA uses its influence, support and expertise to deliver better outcomes for WA Local Governments and their communities.

We advocate to all levels of Government on behalf of our Members, and provide expert advice, services and support to Local Governments.

WALGA’s vision is for agile and inclusive Local Governments enhancing community wellbeing and enabling economic prosperity.

Acknowledgement of Country

WALGA acknowledges the continuing connection of Aboriginal people to Country, culture and community. We embrace the vast Aboriginal cultural diversity throughout Western Australia, including Boorloo (Perth), on the land of the Whadjuk Nyoongar People, where WALGA is located and we acknowledge and pay respect to Elders past and present.

Executive Summary

WALGA appreciates the opportunity to provide comment on [Beyond WAste 2030 – Western Australia’s Waste Avoidance and Resource Recovery Strategy 2030](#) (draft Strategy) and the [Beyond WAste 2030 roadmap](#) (Roadmap).

The draft Strategy has changed significantly from the previous draft, including an increased focus on integration with other State Government priorities and strategies including the Premier’s Priorities, Made in WA and Diversify WA. WALGA has made a range of recommendations on both the Strategy and Roadmap, however considers that, given the significant changes and the provision of two documents, the **28-day consultation period was not adequate** to undertake a review of both documents to the desired level of detail and consult with the Local Government sector and WALGA State Council.

WALGA acknowledges and appreciates the areas where Local Government feedback has been incorporated, including actions to develop an illegal dumping strategy for Western Australia, establish a regional alliance program, increase local reuse and repair options and increase the focus on utilising procurement and research mechanisms to advance circularity.

However, WALGA does not support the Strategy in its current form and considers that there need to be significant changes to ensure that the proposed actions in the Roadmap are sufficient to deliver the 2030 Targets. No information is provided on the impacts of these actions and how they will contribute to the achievement of the Targets. In particular commercial and

industrial (C&I) waste, which has an 80% recycling Target, has only one action relating to that waste stream.

For the Targets to be achieved WALGA is strongly of the view that a much greater level of planning and coordination is required. This includes, as a matter of urgency, reviewing the State Waste Infrastructure Plan to ensure it can guide future investment and developing Waste Management Infrastructure Plans for each region. The development and funded implementation of the Illegal Dumping Strategy is a key priority for Local Governments across Western Australia.

To ensure good governance and coordination WALGA recommends bringing forward the development of Alliances to facilitate regional collaboration and ongoing action (Action 5.1.2). Effective product stewardship is also urgently needed for all types of electronic waste, packaging, tyres and mattresses – not only batteries and Photovoltaics. Many of these initiatives require funding and WALGA reiterates its position that **all funds raised through the Waste Levy should be directed to strategic waste management purposes** to enable the achievement of the proposed strategy targets.

Introduction

WALGA appreciates the opportunity to provide comment on [Beyond WAste 2030 – Western Australia's Waste Avoidance and Resource Recovery Strategy 2030](#) (draft Strategy) and the [Beyond WAste 2030 roadmap](#) (Roadmap). The draft Strategy sets the goals, targets and strategic priorities to 2030, while the Roadmap sets out actions to be implemented over the next five years to support strategy targets and priorities.

Under the *Waste Avoidance and Resource Recovery Act 2007*, the Waste Authority reviews the waste strategy for the State Government every five years. The previous strategy, published in February 2019, provided the objectives, goals, targets and approaches for transitioning WA to 'a sustainable, low-waste, circular economy in which public health and the environment are protected from the impacts of waste', up to 2025. The Strategy review process has been underway since a Directions Paper was released in 2023, which was followed by a [draft Waste Strategy](#) in May 2024. WALGA provided Submissions on both the [Directions Paper](#) and the [draft Strategy](#).

The draft Strategy's five priority areas are:

1. Intensify our focus on waste avoidance and reuse
2. Realise the economic potential of recycling and the circular economy
3. Foster a resilient recycled organics sector
4. Support the circular management of clean energy technologies and electronics
5. Improve outcomes for regional and Aboriginal communities.

The draft Strategy presented for final consultation, *Beyond Waste 2030*, has changed significantly from the previous draft, including an increased focus on integration with other State Government priorities and strategies including Made in WA and Diversify WA. WALGA has made a range of recommendations on both the Strategy and Roadmap, however considers that given the significant changes and the provision of two documents, the 28-day consultation period was not adequate to undertake a review of both documents to the desired level of detail, consult with the sector and seek internal approvals.

WALGA acknowledges and appreciates the areas where Local Government feedback has been incorporated, including actions to develop an illegal dumping strategy for Western Australia, establish a regional alliance program and increase the focus on utilising procurement and research mechanisms to advance circularity.

This Submission has been developed with input from Local Government and Regional Councils, and with reference to WALGA's Advocacy Positions on [Landfill Bans](#), the [Waste Levy](#) and [Product Stewardship](#).

It provides commentary on the structure of the Strategy and Roadmap, examines the key changes from the first draft of the Strategy, identifies areas in the Strategy and Roadmap supported by Local Government and makes recommendations for clarifications or improvements to ensure targets can be met through a fit for purpose strategy.

Structure of Strategy and Roadmap

The approach of having a strategy, supported by a more detailed implementation plan, is standard across many areas of Government operation. The draft Strategy contains a significant amount of background information for context but has very limited detail on what actions will support the achievement of the Targets. The Roadmap includes a succinct summary of the overarching elements of the Strategy as well as the details on implementation. As currently structured, the Strategy document is largely superfluous.

The Roadmap includes a range of actions for each of the priority areas classified as short (1-2 years), medium (3-5 years), long-term (to start in five years and finish after 2030) or ongoing. Although there may be some movement in achievement of these actions, it is strongly recommended that specific years be included for the achievement of these actions.

Recommendations

That the Waste Authority

- **Revise the Strategy to:**
 - **streamline content by reducing the amount of background information / context**
 - **focus the Strategy document on:**
 - **targets**
 - **levers**
 - **priority actions**
 - **aims**
 - **outcomes (Roadmap).**

- **Revise the Roadmap to include specific year dates for the achievements of actions.**

2030 Targets

The targets (Figure 1) presented in the draft Strategy have been retained from the current Strategy, under the key goals of Avoid, Recover and Protect. These Targets are ambitious and WALGA is concerned that the actions proposed in the draft Roadmap lack the detail of how they will contribute and the evidence base to confirm they will support the achievement of these targets. In this section commentary is provided on the Targets and identifies areas for further action to be included in the Roadmap.

Table 1: Beyond WASTE 2030 targets

2030 goals	Avoid Western Australians generate less waste.	Recover Western Australians recover more value and resources from waste.	Protect Western Australians protect the environment by managing waste responsibly.	Avoid – Recover – Protect cutting across each of the three goals
2030 targets	<ul style="list-style-type: none"> Reduce total waste generated per person by 10% 	<ul style="list-style-type: none"> Recover energy only from residual waste Increase the recycling* rate to 75% <ul style="list-style-type: none"> MSW: increase the recycling rate to 70% in Perth and Peel, 60% in major regional centres C&D: increase the recycling rate to 80% C&I: increase the recycling rate to 80% All local governments in the Perth and Peel regions implement better practice FOGO collection systems 	<ul style="list-style-type: none"> No more than 15% of waste generated in Perth and Peel is sent to landfill Work towards eliminating illegal dumping All waste is managed and/or disposed of using better practice approaches and facilities A 20% reduction in litter (on a 2024 baseline) 	<ul style="list-style-type: none"> Reduce disposal of organic waste to landfill by 50% (from 2019–20 levels)

* To avoid confusion and align with the terminology used by other jurisdictions, *Beyond WASTE 2030* uses the term 'recycling' to replace 'materials recovery' used in the previous strategy. The term 'energy recovery' is commonly used to describe the energy recovered from waste processed via energy recovery (waste-to-energy) facilities, while resource recovery includes energy recovery and recycling.

Figure 1: Draft Strategy Targets

Overarching Avoid-Recover-Protect Target

WALGA understands that the Overarching Target has been established to align with [the National Target](#), which focuses heavily on the implementation of Food Organic, Garden Organic (FOGO) systems, and establishing organics processing infrastructure, as the mechanisms to achieve it. In Western Australia, with energy recovery facilities now (or soon to be) in operation, the diversion of much of the organic waste stream from landfill is highly likely. However, this Target, in the absence of a more focused approach on waste avoidance, risks landfill diversion being the only metric, not diversion of waste to highest and best use. WALGA reiterates comments from our Submission on the previous Draft Strategy that there is limited waste composition data on which to establish a baseline figure to measure organic waste diversion against with an acceptable degree of confidence, particularly in the commercial and industrial (C&I) sector.

Engagement with stakeholders across all waste streams is required to determine an appropriate baseline, to assess and measure the impact of each sector and set achievable outcomes.

Avoid Target

The Avoid Target has been significantly reduced from the previous Strategy target of 20% reduction in waste generation per capita by 2030. As outlined in the draft Strategy, per capita waste consumption has increased from 2,452kg in the baseline year 2014-15 to 2,586kg in 2023-24.

As the per capita target includes material from all waste streams, it is unlikely the 10% reduction target will be achieved without specific interventions across all waste streams.

While the actions in the draft Roadmap, under Priority 1, address a range of activities across transport infrastructure, State Government departments, behaviour change programs and reuse and repair initiatives, it is unclear, and no information is provided, what impact these actions will have on reducing per capita waste generation.

Recover Target

WALGA's Submission on the 2024 Draft Strategy requested clarification on the definition of residual waste in the Recover Target, as limited information has been provided as to how progress against the target would be monitored.

The new Draft clarifies the definition of residual waste in the context of energy recovery, stating 'energy recovery is preferable to landfill but should only be applied to residual waste, after better practice source separation and recycling approaches have been exhausted'. At present, better

practice guidance has not been developed for the C&I sector. Given the definition of residual waste, this raises concerns that highly recoverable organic waste may be sent to energy recovery in the absence of other interventions.

The recovery targets for the municipal solid waste (MSW), construction and demolition (C&D) and C&I streams have been retained from the previous draft. Of these streams, only C&D recorded a recycling rate of more than 50% in 2023-24. Significant investment and action will be required to meet the MSW and C&I recycling rates of 70% and 80% respectively.

As highlighted in WALGA's submission on the previous draft Strategy, the proposed recycling target rate of 60% for major regional centres requires clarification in whether it applies to an average rate across all centres, or an individual rate of 60% for each one.

This is an unrealistically ambitious target for regional centres, as waste and recycling services and opportunities differ greatly across the State. The actions listed in the roadmap under Priority 5 are in most cases specific to remote and Aboriginal communities and the mining sector, which is unlikely to significantly advance the recycling rate for regional centres.

The 2024 draft included actions to extend FOGO or Food Organic (FO) services to Local Governments and businesses across the state, to assist in the recovery of organic waste. These actions have been removed from the latest draft, however the targets for the C&I stream and major regional centres have not altered.

WALGA understands the shift away from C&I FOGO/FO actions is due to a renewed focus on the FOGO system for households, to ensure the system and markets have capacity before beginning to accept C&I FOGO material.

However, removing the C&I actions for organic waste from the strategy will significantly limit the ability to meet the recycling target outlined, as there are no specific interventions for C&I listed in either the Strategy or roadmap beyond landfill audits.

The target of *"all Local Governments in the Perth and Peel regions implement better practice FOGO collection systems"* is maintained from the current strategy. While a timeframe for implementation has not been defined, it is assumed the target aims for achievement by 2030.

The associated action in the draft Roadmap, 3.4.1, states *"Investigate measures required to support all Local Governments in the Perth and Peel regions to implement better practice FOGO systems"* and refers to a potential future mandate for local Governments in the Perth and Peel region. This is listed as a long term action, indicating it will be complete after 2030.

As there is no detail provided around how or what the conditions would be for a mandate to be considered, Local Governments not yet committed to FOGO have requested clarification on whether they will be required to begin planning to move to FOGO to support the strategy targets and how this may align with existing contracts and processing agreements. Other Local Governments who have committed to FOGO have expressed disappointment that a FOGO mandate has not been included in the draft Strategy.

In line with better practice guidance, a planning period of at least two years is recommended to effectively prepare for FOGO implementation, including procurement processes for waste contracting and infrastructure. The requirement for funding to support the transition is explored further under commentary on Priority 3.

Recommendations

That the Waste Authority:

- Revise the Strategy to:
 - define Major Regional Centres and identify if the 60% target is measured at an aggregate level, or individually
 - provide guidance on how only residual waste sent to energy recovery will be monitored and enforced.

- Revise the Roadmap to include:
 - a timeframe for a decision on a FOGO mandate for Perth and Peel and the conditions which would lead to a mandate (Action 3.4.1)
 - actions for C&I waste to ensure the 80% recycling target is met
 - actions for regional centres to ensure the 60% recycling target is met.

Protect Target

The Draft Strategy states "landfill remains the least desirable treatment, only to be used when other options are not viable, and ideally, at landfills managed to better practice standards". The draft Strategy also retains the target of "all waste is managed and/or disposed of using better practice approaches and facilities," which was previously listed under the Overarching Avoid-Recover-Protect Target category.

At present, better practice guidance for landfills has not been developed. WALGA notes the development of better practice guidance for waste facilities is an ongoing action under F.1.8 in the Roadmap however will take significant time to develop, implement and monitor.

Better practice approaches should build on the regulatory frameworks in place for waste facilities, rather than being compliance-based and be developed in consultation with industry to ensure effective implementation.

The Protect Target has been in place since the 2019 Strategy and has been a key driver of waste initiatives. The State Government's recent approval of a 5.6 million cubic metre capacity landfill to be established in the Shire of York to receive commercial waste generated in the Perth metropolitan area highlights the disconnect between environmental approvals and Waste Strategy targets.

In the 2014 Review of the *Waste Avoidance and Resource Recovery Act*, and subsequently in the 2017 [Waste Reform Project](#), it was identified that:

There is a strong case to reform the landfill policy and regulatory framework to include planning, siting and compliance considerations so that landfills can be managed consistent with government policy. Policy considerations should balance the need to ensure availability of sufficient landfill space to manage residual waste and unplanned events...with the need to limit supply to encourage maximum diversion from landfill.

This important reform has not been progressed.

WALGA's Submission on the [Waste Reform Project](#) specifically recommended:

That the Environmental Protection Act be amended to ensure the CEO can refuse a license application if the facility will undermine the State Waste Strategy outcomes and targets.

The Submission also identified that:

The lack of a strategic approach is likely to lead to more landfills in the areas surrounding Perth, greater competition between sites, lower landfill prices and ultimately, a situation where the landfill diversion targets in the State Waste Strategy are undermined.

Approval of the York landfill does not support the aims of the Waste Strategy, is in opposition to Local Government planning conditions and undermines the target of reducing overall waste to landfill by 2030.

Recommendations

- That the State Government amend the Environmental Protection Act to ensure that the State Waste Strategy Targets are a key consideration in facility approvals.
- That the Waste Authority / Department of Water and Environmental Regulation, as a matter of priority, set a clear timeframe for the development and implementation of better practice landfill guidance.

Priorities

The draft Strategy outlines five priorities, three of which have been carried over from the previous draft Strategy and two new priorities (3 and 4):

1. **Intensify our focus on waste avoidance and reuse:** Avoid waste generation through reuse and repair and maintaining the value of products and materials for as long as possible
2. **Realise the economic potential of recycling and the circular economy:** Transform waste into a valuable resource to create an efficient and profitable circular economy
3. **Foster a resilient recycled organics sector:** Increase the recycling of organic material and support the development of quality recycled organics products and end markets
4. **Support the circular management of clean energy technologies and electronics:** Develop end-of-life solutions for the management and recycling of clean energy technologies and increase the recycling of and value from electronic waste
5. **Improve outcomes for regional and Aboriginal communities:** Develop and deliver fit-for-purpose waste infrastructure and services to meet community needs.

The changes reflect the Strategy's integration with State Government priorities. The contingency planning and climate resilience priority, which was included in the first draft of the Strategy, has been removed. This section includes commentary on each of the Priority areas and associated outcomes and actions.

Priority 1: Intensify our focus on waste avoidance and reuse

WALGA supports the renewed focus on waste avoidance in the draft Strategy and welcomes the actions to facilitate reuse and repair through a funded program, as well as ongoing support for behaviour change around food waste and responsible charitable donations.

However, WALGA reiterates that **key initiatives and actions outlined still focus on keeping existing materials in circulation rather than avoiding the generation of waste** in the first instance, which is the highest priority in the waste hierarchy.

The actions listed in Outcomes 1.1 and 1.2 show a wider focus on research and state-wide activity around sustainable procurement, systems focus and the Plan for Plastics, however these are high level, ongoing actions which provide limited insight into how they will contribute to the Avoid target of reducing per capita waste generation by 10%.

Recommendations

- That the Waste Authority:
 - Reword Priority 1 to 'Avoid waste generation, maximise reuse and repair to maintain the value of products and materials'.
 - Investigate/document how each outcome (1.1 to 1.4) will contribute to achieving the Avoid Target.

Priority 2: Realise the economic potential of recycling and the circular economy

WALGA's Submission on the previous draft Strategy recommended the development and implementation of the Recovered Materials Framework, within a set timeframe, be included as an action in the Strategy.

Recovered Materials Framework

While Roadmap Action 2.1.1 focuses on the Recovered Materials Framework, no timeframe has been set. This is listed as a medium term action, and previous correspondence through the Framework's Stakeholder Reference Group indicated legislation was anticipated to be drafted in 2027. The wording of the action, to 'further develop' the Framework, suggests the Framework is already in place rather than still in development.

Infrastructure Plan

The State Waste Infrastructure Plan, while a useful starting point for infrastructure planning across the State, has significant limitations as a practical document for Local Governments. WALGA welcomes Action 2.4.3 *Review, update and build on the findings of the State Waste Infrastructure Plan* and recommends that this review be undertaken as a matter of priority, in consultation with Local Governments.

Non-metropolitan Local Governments face a range of challenges in effectively managing waste and implementing resource recovery solutions. Key challenges include recruiting and retaining staff, resourcing for programs and facilities and distance from processing facilities leading to high material transport costs. Feedback from Local Government, included in WALGA's previous Submission on the draft Strategy, identified managing waste as close to source as possible as a priority. This approach is not supported by the consolidation model; where infrastructure is established or expanded for the purpose of consolidating and transporting material to Perth and Peel.

The preferred approach is the development and implementation of Waste Management Infrastructure Plans for each region which identify current and future waste types and tonnages and facilitate the development of business cases for infrastructure investment tailored to the region. This approach facilitates local waste management, minimises need for transport of waste and maximise benefit to local communities.

Infrastructure grants program

Action 2.4.5 proposes designing, delivering and supporting infrastructure grants programs for high-impact materials, including batteries, solar panels and organics. Further information is required on the materials considered high impact under this action, as Local Governments are increasingly managing materials with limited accessible processing options including tyres and mattresses which would also benefit from increased infrastructure.

Recommendations

- **That the Waste Authority:**
 - include a timeframe for the development and implementation of the Recovered Materials Framework
 - review the State Waste Infrastructure Plan as a matter of urgency to ensure it is fit for purpose and can guide future investment
 - include an action to develop Waste Management Infrastructure Plans for each region, focusing on processing waste as close as possible to the point of generation
 - clarify the definition of high impact materials in Action 2.4.5, and if not included add tyres and mattresses.

Priority 3: Foster a resilient recycled organics sector

This is a new priority area which has replaced a more general approach to priority materials.

WALGA welcomes the inclusion of actions on FOGO inputs and education, contamination management and kerbside audits. These actions will assist Local Governments with FOGO to implement consistent community education and engagement.

Action 3.4.1 introduces the possibility of a future FOGO mandate, however there is little supporting information as to what circumstances would lead to a mandate being introduced and the associated timeframe. This is listed as a long-term action.

WALGA understands a mandate has not been included as the Department is undertaking actions to improve and develop markets for the existing FOGO stream. However this provides little incentive or support for those Local Governments who have not moved to FOGO to make the transition. Targets within the draft Strategy rely on an increased amount of FOGO being collected and processed, which will be difficult to achieve without increased FOGO uptake and/or targeted interventions to recover food waste from the C&I sector.

Local Governments have expressed concern about the financial and physical resources required to implement FOGO, as the Better Bins Plus funding covers only a proportion of the costs required through subsidising the cost of infrastructure such as bins and kitchen caddies. The Better Bins Plus – Go FOGO program has provided funds to 22 Local Governments to assist in FOGO implementation, with three others approved for funding in 2025-26. The Better Bins Plus program will close its final funding round in March 2026, and WALGA understands an ongoing funding program is yet to be established. Introducing a FOGO mandate without an accompanying funding stream will place Local Governments under significant strain to implement and maintain an effective service.

The action to undertake C&I audits is a potential starting point, as information on tonnage and composition data for the C&I sector is limited. However, to date there has been limited assistance provided to the C&I sector to assess and recover organic waste. A focus could include targeted programs to assist businesses (on a sector by sector basis) to assess and reduce their waste and improve resource recovery. In the non-metropolitan area Local Governments frequently assist in managing C&I waste as there may be limited or no other service providers.

Recommendations

- That the Waste Authority:
 - clarify under what conditions a FOGO mandate would be considered and set a timeframe for mandate decision
 - put in place a new FOGO funding Program for Local Government to fully cover the costs of implementing better practice separation systems, including effective behaviour change programs for the community
 - develop a targeted program to assist businesses to assess and reduce their waste and improve recovery of organic waste in the C&I sector.

Priority 4: Support the circular management of clean energy technologies and electronics

This is a new priority area which has been included to ensure alignment with national approaches and other State Government priorities. It is however quite narrow in focus and should be expanded to a Product Stewardship focus.

Focus on Solar and Wind Energy

The management of end-of-life solar panels and wind energy has emerged as a focus within the draft Strategy, driven by national priorities and alignment to other State Government priority areas (Diversify WA). Work is underway at the national level to develop a future product stewardship scheme for solar panels. WALGA acknowledges the work being undertaken by Government on solar and wind energy; to ensure effective management of these future waste streams, effective product stewardship including design standards, infrastructure investment and funded end of life pathways is essential. Although some wind and solar facilities are in place, large scale development has yet to occur. There is benefit in planning for these future waste streams, but not at the expense of more urgent and widespread issues.

Advocacy and Action for Product Stewardship

Local Government has identified that **effective product stewardship is urgently needed for all types of electronic waste, packaging, tyres and mattresses.**

These products represent significant cost and risk for Local Government and the community.

WALGA's [Product Stewardship Advocacy Position](#) states industry should take responsibility (physical and/or financial) for the waste that it generates through the entire life cycle of the products it produces through the implementation of effective product stewardship. Without effective product stewardship, there will be increasing costs for the community, resource recovery targets will be difficult to reach and a transition to a circular economy is unlikely.

Effective product stewardship schemes should cover the entire cost of the product recycling (collection and recycling) - not just a proportion of the costs, be easy and convenient for the community to access, and have no additional cost to consumers when the product is disposed of post consumption. Product stewardship provides the link between the benefit the producers receive for selling a product with ensuring that the product will be appropriately dealt with at the end of life. It ensures that the community, through Local Government, are not subsidising these costs.

E-waste Landfill Ban

WALGA acknowledges the intent of the e-waste to landfill ban and its alignment to global, national and local environmental and recovery targets. However, WALGA's [position on landfill bans](#) is that such bans are only supported in the presence of effective product stewardship schemes, or other funding mechanisms, for products which would be subject to the ban.

Consequently, WALGA considers advocacy to improve and expand the National TV and Computer Recycling Scheme (NTCRS) is a priority. The NTCRS is not considered effective as it covers only a proportion of the costs of e-waste recycling.

Action 4.3.1. is to *Continue to implement the e-waste to landfill ban*, which commenced in July 2024. WALGA understands reporting for the first year has taken place and recommends the Department provide regular reporting on amount and type of material collected to assess its effectiveness. Feedback from Local Government indicates the cost of e-waste collection and recycling has increased in the past 12 months, as they are both collecting higher amounts of scheme and non-scheme e-waste and paying a higher price per tonne for processing. A metropolitan Material Recovery Facility operator has also reported an increase in e-waste through the facility since the ban was implemented, indicating residents are incorrectly placing e-waste materials into recycling bins in higher numbers.

Embedded batteries

The supply of vapes without a prescription is illegal in WA, however feedback from Local Government and other stakeholders indicates that despite compliance efforts, illegal vapes are

readily available across Western Australia. These products do not have a defined end of life pathway and because they are illegal this presents a significant challenge for collection and recycling. WALGA, with funding from the Waste Authority, undertook a collection study which showed that these products could be recycled, however it is expensive to undertake.

Currently, Local Governments are reporting they are managing illegal vapes which are being collected during litter cleanups, disposed of in public bins or illegally dumped. Roadmap Action 4.2.1. focuses on facilitating the development of a collection network for embedded batteries, providing accessible consumer collection options for devices with embedded batteries such as vapes and e-scooters. This is strongly supported, however the implementation needs to be carefully considered given the regulatory framework for illegal vapes and the difficulties of collecting these products.

Battery Stewardship Scheme

Action 4.2.3 *Develop Western Australian product stewardship arrangements for batteries* requires further information before it can be supported, as it is unclear how the State-based arrangement proposed differs from the national B-Cycle scheme already in place. WALGA considers the key difference may be a mandatory arrangement as has been established in New South Wales, however this requires clarification.

Recommendations

- **That the Waste Authority:**
 - reword Priority 4 to 'Support circular management through effective product stewardship'
 - expand actions under this priority to include national advocacy and action to develop and implement effective product stewardship for e-waste, packaging, tyres and mattresses or develop state-based product stewardship approaches
 - in the absence of effective production stewardship for e-waste, provide funding support to Local Governments for the ongoing collection and recycling of e-waste.

- **That the Department of Water and Environmental Regulation:**
 - publicly report on the first year of the e-waste to landfill ban, including amount and type of material collected.
 - consider rewording Action 4.2.3 to clarify whether the product stewardship arrangements referred to are mandatory, and how it would align with the existing B-Cycle scheme.

- **That the State Government:**
 - intensify compliance activities in relation to illegal vapes to assist with avoiding the generation of a problematic waste.

Priority 5: Improve outcomes for regional and Aboriginal communities

The title of the priority, *Improve outcomes for regional and Aboriginal communities*, should be further defined, as regional communities and Aboriginal communities are vastly different with distinct needs.

In particular, the funding and responsibility for waste service delivery differs greatly in regional towns and discrete Aboriginal communities located on Aboriginal Lands Trust land.

Alliance approach

WALGA welcomes the inclusion of Action 5.1.2 *Help Local Government to build and share capacity using an alliance model*, as collaboration and resource sharing between Local Governments is key to maximising the benefits of waste and environmental programs in the regions. WALGA, with

funding from the Department of Water and Environmental Regulation, undertook a successful pilot Alliance Program. The Climate Alliance model enables geographic groupings of Local Governments to employ a Regional Coordinator and deliver projects that provided economic, environmental and social benefits to the region.

Aboriginal community engagement – Western Australia wide focus

Because this action focuses on regional and Aboriginal communities it does not include sufficient focus on Aboriginal communities which are town based or metropolitan.

Local Government feedback strongly supported Action 5.1.1 *Develop culturally-appropriate waste and litter education and behaviour change resources for community and school to encourage improved litter prevention and waste sorting in Aboriginal communities*, with the recommendation this action be extended to the development of culturally appropriate resources for Aboriginal communities within the metropolitan area, as many Local Governments have significant Aboriginal populations.

Provision of Municipal Services to remote Aboriginal Communities

Action 5.1.4 is to *work with a regional or remote community, together with the relevant Local Government, to co-design, develop and implement a culturally informed initiative that identifies local waste management priorities and needs, with a focus on improving related health and wellbeing outcomes*, with a focus on collecting waste data and assessing existing service delivery models. The roadmap lists Department of Water and Environmental Regulation as the lead agency as a long term action. Local Government has a limited role providing municipal services to remote Aboriginal communities and this area is an ongoing challenge, as many remote communities are struggling to fund the maintenance and expansion of landfill sites, several of which are at the end of life. The Department of Communities, through its Remote Essential and Municipal Services Program has been leading work in this area and as such WALGA considers this action should be the responsibility of the Department of Communities as the lead agency, rather than under the WARR account funding model. The focus should be on ensuring communities have the essential services required for effective waste management, and adequate funding for delivery, as the key priority.

Social Housing

Action 5.2.2 *Include waste management clauses in Housing Authority contracts to ensure that contractors are accountable and comply with waste disposal requirements in the regions* addresses the issue of regional contractors carrying out services effectively, however the actions around Department properties would benefit from a much broader focus.

Local Government feedback shows there are widespread waste management concerns with Department of Housing and Works properties across the State, with issues including illegal dumping, ongoing contamination of kerbside bins, inadequate bin numbers and storage and difficulty with effectively engaging with Departmental staff.

WALGA considers this action should be expanded or a new action added to engage with the Department of Housing and Works to develop guidance and resources to clarify processes and improve waste and recycling services at Department properties in both regional and metropolitan Western Australia.

Regional Recovery

The draft Strategy states higher recovery rates are needed in every region of WA to meet targets and there is a need to further investigate region specific gaps, challenges and opportunities. WALGA generally supports Action 5.3.1 to *Improve understanding of the barriers to a circular economy for recovered resources in regional WA*. However the appointment of Minerals Research

Institute of Western Australia as the lead agency indicates the focus will be on recovery from the mining sector rather than Local Government and community.

There is a significant scope to leverage existing systems, such as Containers for Change to provide a hub for product stewardship and a network of collection locations for materials which cannot be disposed of in kerbside bins, or where no appropriate kerbside system exists. Local Governments have provided very positive feedback on how the Containers for Change Program has assisted in providing recycling options for regional and remote, as well as metropolitan, communities. WALGA identified this as an opportunity for the Scheme in the initial consultation on its development. For example, many of the Container Deposit Scheme depots in South Australia also collect e-waste and scrap metal. However, this will only be achievable if the material collected is also part of an effective product stewardship scheme which covers all the costs associated with collection, transport and recycling. This approach will ensure these services are accessible across WA, even in areas with limited Local Government services available.

Recommendations

- **That the Waste Authority:**
 - revise the title of Priority 5 to define and separate 'regional communities' and 'Aboriginal communities' to reflect their distinct nature and service delivery needs
 - revise Action 5.1.1 to include the development of culturally appropriate resources for Aboriginal communities across Western Australia including both remote, town based and metropolitan communities
 - clarify the lead agency responsible for the delivery of Municipal Services for Remote and Town based Aboriginal communities
 - revise Action 5.2.2 or add a new action to develop guidance with the Department of Housing and Works to improve waste and recycling services at Department properties in both regional and metropolitan WA.

- **That the State Government:**
 - ensure funding is adequate to meet the essential waste management needs of residents in Remote and Town based Aboriginal communities
 - work with Containers for Change to leverage the extensive collection network in place to provide opportunities for collection of other materials covered by effective product stewardship schemes.

Foundational Actions

Illegal Dumping Strategy

WALGA welcomes the inclusion of Action F.1.6 *Develop an Illegal Dumping Strategy for WA*. Local Government feedback shows there are widespread issues in responding to and attempting to proactively manage waste from properties with a history of high contamination, including illegal dumping at, and around, multi-unit dwellings.

Development of a comprehensive strategy incorporating feedback and required actions from State Government agencies alongside Local Government and other stakeholders is anticipated to reduce the amount of dumped material, decrease management costs, improve behaviour and increase community amenity. Local Governments, across Western Australia, have identified this as an action which is urgently required and needs to be fully resourced.

The use of emerging technology such as AI is addressed in Action F.1.7 *Use Artificial Intelligence (AI) to implement targeted action related to illegal dumping of tyres*. Local Government feedback shows support in expanding this action to use AI to assist in contamination management and illegal dumping in general.

Waste Levy

Action F.1.1 *Review the effectiveness of the waste levy and consult on any proposed changes*, is listed as an ongoing action. A five-year schedule of levy rates has been published, with small annual increases.

Forecasts provided in the [Waste Authority's 2024-25 Business and Action Plan](#) indicate a downturn in estimated Levy revenue in coming years, as tonnes to landfill reduce, with Local Governments moving to FOGO and energy recovery operations. The allocated amount of approximately \$20 million remains unchanged as the hypothecation percentage is forecast to rise from 2025-26 onwards, reaching 30% by 2026-27.

WALGA reiterates its position that all funds raised through the Levy should be directed to strategic waste management purposes to enable the achievement of the proposed strategy targets. WALGA's position is also clear that the Levy should not be applied to waste generated in the non-metropolitan area or to waste received at premises undertaking licensed activities whose primary purpose is resource recovery.

Recommendations

- **That the Waste Authority:**
 - revise Action F1.6 and develop the Illegal Dumping Strategy in 2026 and this development included identifying and securing funding for implementation
 - revise Action F.1.1 to include timed activities for levy review
 - revise Action F.1.7, or create a new action, to include the use of AI to monitor contamination and illegal dumping on Local Government land.

Conclusion

WALGA does not support the draft Strategy in its current form as it is concerned that the proposed actions outlined in the Roadmap are not strong enough to deliver on the ambitious targets set for achievement by 2030; in particular the 80% C&I recycling Target and the 50% Organic Waste Landfill diversion.

WALGA has put forward a range of recommendations on both the Strategy and Roadmap, however the 28-day consultation period provided made it challenging to comment on both documents to the desired level of detail, particularly due to the significant shift in focus compared to both the Directions Paper and first draft Strategy.

Summary of Recommendations

Structure of Strategy and Roadmap

- 1 That the Waste Authority
 - Revise the Strategy to:
 - streamline content by reducing the amount of background information / context
 - focus the Strategy document on:
 - targets
 - levers
 - priority actions
 - aims
 - outcomes (Roadmap).
 - Revise the Roadmap to include specific year dates for the achievements of actions.

2030 Targets

- 2 That the Waste Authority:
 - Revise the Strategy to:
 - define Major Regional Centres and identify if the 60% target is measured at an aggregate level, or individually
 - provide guidance on how only residual waste sent to energy recovery will be monitored and enforced.
 - Revise the Roadmap to include:
 - a timeframe for a decision on a FOGO mandate for Perth and Peel and the conditions which would lead to a mandate (Action 3.4.1)
 - actions for C&I waste to ensure the 80% recycling target is met
 - actions for regional centres to ensure the 60% recycling target is met.
- 3 That the State Government amend the Environmental Protection Act to ensure that the State Waste Strategy Targets are a key consideration in facility approvals.
- 4 That the Waste Authority / Department of Water and Environmental Regulation, as a matter of priority, set a clear timeframe for the development and implementation of better practice landfill guidance.

Priority 1

- 5 That the Waste Authority:
 - Reword Priority 1 to 'Avoid waste generation, maximise reuse and repair to maintain the value of products and materials'.
 - Investigate/document how each outcome (1.1 to 1.4) will contribute to achieving the Avoid Target.

Priority 2

- 6 That the Waste Authority:
 - include a timeframe for the development and implementation of the Recovered Materials Framework

- review the State Waste Infrastructure Plan as a matter of urgency to ensure it is fit for purpose and can guide future investment
- include an action to develop Waste Management Infrastructure Plans for each region, focusing on processing waste as close as possible to the point of generation
- clarify the definition of high impact materials in Action 2.4.5, and if not included add tyres and mattresses.

Priority 3

7 That the Waste Authority:

- clarify under what conditions a FOGO mandate would be considered and set a timeframe for mandate decision
- put in place a new FOGO funding Program for Local Government to fully cover the costs of implementing better practice separation systems, including effective behaviour change programs for the community
- develop a targeted program to assist businesses to assess and reduce their waste and improve recovery of organic waste in the C&I sector.

Priority 4

8 That the Waste Authority:

- reword Priority 4 to 'Support circular management through effective product stewardship'
- expand actions under this priority to include national advocacy and action to develop and implement effective product stewardship for e-waste, packaging, tyres and mattresses or develop state-based product stewardship approaches
- in the absence of effective production stewardship for e-waste, provide funding support to Local Governments for the ongoing collection and recycling of e-waste.

9 That the Department of Water and Environmental Regulation:

- publicly report on the first year of the e-waste to landfill ban, including amount and type of material collected.
- consider rewording Action 4.2.3 to clarify whether the product stewardship arrangements referred to are mandatory, and how it would align with the existing B-Cycle scheme.

10 That the State Government:

- intensify compliance activities in relation to illegal vapes to assist with avoiding the generation of a problematic waste.

Priority 5

11 That the Waste Authority:

- revise the title of Priority 5 to define and separate 'regional communities' and 'Aboriginal communities' to reflect their distinct nature and service delivery needs
- revise Action 5.1.1 to include the development of culturally appropriate resources for Aboriginal communities across Western Australia including both remote, town based and metropolitan communities

- clarify the lead agency responsible for the delivery of Municipal Services for Remote and Town based Aboriginal communities
- revise Action 5.2.2 or add a new action to develop guidance with the Department of Housing and Works to improve waste and recycling services at Department properties in both regional and metropolitan WA.

12 That the State Government:

- ensure funding is adequate to meet the essential waste management needs of residents in Remote and Town based Aboriginal communities
- work with Containers for Change to leverage the extensive collection network in place to provide opportunities for collection of other materials covered by effective product stewardship schemes.

Foundational Actions

13 That the Waste Authority:

- revise Action F1.6 and develop the Illegal Dumping Strategy in 2026 and this development included identifying and securing funding for implementation
- revise Action F.1.1 to include timed activities for levy review
- revise Action F.1.7, or create a new action, to include the use of AI to monitor contamination and illegal dumping on Local Government land.