

Flying Minute: Submission on State Waste Strategy Directions Paper

By Rebecca Brown, Manager, Waste and Environment

That State Council endorse the State Waste Strategy Directions Paper Submission.

RESOLUTION 225.FM/2023

CARRIED

Executive Summary

- The State Government has released a Waste Avoidance and Resource Recovery Strategy 2030 (Waste Strategy) [Directions Paper](#), as the first stage of consultation for the Strategy Review.
- Feedback on the Directions Paper will inform an updated Draft Waste Strategy, which will be released for consultation in late 2023 for a minimum of 12 weeks.
- A draft Submission on the Directions Paper was developed and distributed to Local Government for feedback, feedback has now been incorporated the Submission finalised.
- Key focus areas for the updated Strategy identified in the Submission, include:
 - Increased focus on evidence-based waste avoidance programs for priority wastes;
 - Engagement with Commercial & Industrial sector;
 - Influencing effective national product stewardship schemes for electronic waste, packaging and tyres; and
 - Coordination and support for regional and remote areas.

Attachment

- Submission on the State Waste Strategy Directions Paper.

Policy Implications

This Submission relates to [Advocacy Position 7.2 State Waste Strategy](#):

Local Government requires leadership and clear direction from the State Government in relation to waste management. As such, Local Government supports the development and implementation of a comprehensive State Waste Strategy which:

- a. Is consistent with the content, purpose and objective of existing legislation and policy at both a state and national level;*
- b. Clearly identifies the roles and responsibilities of the Waste Authority in regard to the development and implementation of the Strategy, as outlined in the Waste Avoidance and Resource Recovery Act 2007;*
- c. Is reviewed, with Stakeholder input, within 2 years of implementation; and*
- d. Includes achievable targets for all waste streams and focuses on waste reduction, resource recovery and the diversion of waste from landfill. Targets should be based on accurate baseline data and clearly identify roles, responsibilities and funding for each target area.*

February 2010 – 11.1/2010

Background

The Waste Authority is reviewing the 2019 State Waste Strategy. The review will seek feedback on how the Waste Strategy is performing, what is working and opportunities for improvement. The first step in the review process was the release of a [Directions Paper](#) on 30 May 2023, for a 6 week consultation period closing 11 July. A Draft Waste Strategy will be released in late 2023 for a minimum 12 week consultation.

The Directions Paper seeks feedback on opportunities to build on existing initiatives, such as Containers for Change and WA's Plan for Plastics, improve service delivery in regional and remote

communities, align with state policy and further investigate emerging technologies as alternatives to landfill. The Directions Paper also requests feedback on the Waste Strategy's current objectives, targets and priority materials, application of the Waste Levy and emergency management of waste.

A draft Submission on the Directions Paper was developed and circulated to Local Government for feedback. A consultation session with Local Government was held on 14 June 2023 to gather feedback from the sector (21 Local Governments registered for the session). The Officers Advisory Group also met on 21 June 2023 to discuss the draft Submission and the key issues for inclusion in the final Submission. This Submission also draws on previous WALGA's submissions to the 2018 [Consultation Paper](#) and [Draft](#) of the current Waste Strategy.

The Municipal Waste Advisory Council and Environment Policy Team considered and endorsed the Submission on Wednesday 26 June 2023.

Comment

The Submission notes that the current Waste Strategy has propelled change in how waste is managed in Western Australia, with a number of important initiatives being implemented. This includes Containers for Change, the WA Plan for Plastic and large funding programs for infrastructure. Reviewing the Strategy provides an important opportunity to build on this momentum and further increase public engagement in achieving the Waste Strategy objectives and targets. The Submission responds to the questions asked in the Directions Paper and identifies the key focus areas for the future, include:

- Increasing the focus on waste avoidance, through evidence based programs for priority waste streams such as food waste, plastics and textiles.
- Undertaking engagement and developing opportunities for the Commercial & Industrial sector to reduce waste and increase recovery.
- Influencing the development of effective Product Stewardship Schemes at national level, for priority materials including electronic waste, packaging and tyres.
- Coordination and support and for regional and remote areas to assist in developing regional infrastructure solutions to increase resource recovery and undertaking initiatives to reduce waste.

This is the first stage of consultation, as part of the Waste Strategy Review, and offers the opportunity to raise key gaps with the current approach. These issues will be further explored with stakeholders to inform the development of the Draft Waste Strategy, scheduled for release in late 2023.

FLYING MINUTE OUTCOME

Poll created: 03/07/2023 at 10:27

Poll closed: 10/07/2023 at 23:59

Total invited to survey: 24

Total finished survey: 18

Endorse the Recommendation: 12

Endorse the Recommendation subject to comment below: 6

Do not endorse: 0

First Name	Last Name	Completed Date
Carol	Adams OAM	10/07/2023 20:03
Phillip	Blight	09/07/2023 18:43
Laurene	Bonza	Not Completed
Ruth	Butterfield	09/07/2023 23:06
Cheryl	Cowell	Not Completed
Frank	Cvitan	06/07/2023 9:53
John	Daw	04/07/2023 14:13
Tony	Dean	03/07/2023 20:37
Catherine	Ehrhardt	03/07/2023 14:48
Russ	Fishwick JP	04/07/2023 12:40
Moira	Girando JP	07/07/2023 9:39
Patrick	Hall	04/07/2023 13:56
Logan	Howlett JP	04/07/2023 12:26
Paul	Kelly	05/07/2023 21:31
David	Lagan	Not Completed
Peter	Long	05/07/2023 13:28
Chris	Mitchell JP	10/07/2023 17:42
Chris	Pavlovich	Not Completed
Les	Price	Not Completed
Michelle	Rich	10/07/2023 13:10
Helen	Sadler	09/07/2023 20:57
Ken	Seymour	Not Completed
Stephen	Strange	04/07/2023 13:04
Doug	Thompson	03/07/2023 11:57

Responses

(12) Endorse the Recommendation: President Cr Stephen Strange, Cr Russ Fishwick JP, Cr Doug Thompson, President Cr Tony Dean, Mayor Peter Long, Cr Catherine Ehrhardt, Cr Ruth Butterfield, Cr Frank Cvitan, Cr John Daw, Mayor Patrick Hall

(6) Endorse the Recommendation subject to comment below: Mayor Carol Adams OAM, President Cr Phillip Blight, Cr Paul Kelly, Mayor Logan Howlett JP, Cr Helen Sadler, President Cr Moira Girando JP

(0) Do not endorse

Comments

Mayor Logan Howlett JP

9. Contingency Planning - add an 'A' to WALGA as shown below:

What sort of mechanisms do you think are effective in responding to sudden changes to waste generation rates or processing capacity? During the COVID-19 pandemic, WALGA, worked with Local Governments that ...

Cr Paul Kelly

We seemed to be quiet in the submission regarding the question of 'should there be an increase in the waste levy'. Happy with submission but we should say directly that we don't support an increase. They % of the levy being returned to LG is now low and is therefore simply becoming a tax on ratepayers.

President Cr Moira Girando JP

Comments from the Shire of Chapman Valley, letter sent by CEO Jamie Criddle to the Department of Water and Environmental Regulation:

"I write to you on behalf of Shire of Chapman Valley to express our deep concerns regarding the proposed extension of the State Government's Waste Levy to regional Western Australia beyond the Perth Metropolitan area. We strongly object to this measure.

While we understand the government's intentions to promote effective waste management and environmental sustainability, it is crucial to recognize the significant differences and unique challenges faced by rural, remote, and regional areas in managing waste. The extension of the Waste Levy without considering the lack of economies of scale and the additional burdens of transport cost and logistics in regional areas is a cause for serious concern.

One size does not fit all when it comes to waste management in Western Australia. Perth Metropolitan-centric views and solutions cannot be attributed to regional Western Australia. The distinct characteristics of regional areas, such as lower population density, limited infrastructure, and geographical challenges, necessitate a tailored approach to waste management that aligns with the specific needs and capabilities of these communities.

The introduction of the Waste Levy to regional areas without sufficient consideration of these factors would place an undue burden on local governments, businesses, and communities. The financial implications, particularly for smaller councils with limited resources such as Chapman Valley, would be substantial and could hinder their ability to effectively manage waste, invest in essential infrastructure, and meet the diverse needs of their communities.

Additionally, the transportation costs associated with waste disposal over long distances can be exorbitant and would further strain regional budgets. The remote location of many regional areas presents logistical challenges in terms of transportation and access to suitable waste management facilities. Imposing a blanket Waste Levy without addressing these fundamental issues would be unjust and inequitable to regional Western Australia. This was evident with the Shire of Chapman Valley's recent waste collection pickup contract negotiation which increased by 530%.

Therefore, we respectfully request the Government and the Department of Water and Environmental Regulation WA to collaborate with regional stakeholders, local governments, and industry representatives is crucial to develop a comprehensive and sustainable waste management strategy that respects the diversity of Western Australia on this matter.

We are advocating against the extension of the Waste Levy to regional areas, emphasizing the need for a differentiated approach that considers the unique circumstances and challenges faced by these communities.

We appreciate your attention to this critical issue and trust that the Department of Water and Environmental Regulation WA will consider the interests and concerns of regional Western Australia in this matter.”

President Cr Phillip Blight

This looks good however can we attempt to move things along by advocating in the “Focus Materials” section that: The Waste Authority identify focus materials for focused and targeted action through their Waste Strategy every 2 years, such as waste tyres and mattresses.

Cr Helen Sadler

Supported in full. Minor typo in 9. Contingency Planning (page 10) says WALG - I assume should say WALGA.

Mayor Carol Adams

Will forward submission from the City of Kwinana in separate email. (See attached)

Secretariat Comment

The editorial comments provided by Mayor Howlett and Cr Sadler have been incorporated. WALGA’s 2018 [Waste Levy Policy Statement](#) supports comments provided by President Cr Girando; there is no support for the application of the Waste Levy to landfills outside the metropolitan area.

Regarding Cr Kelly’s feedback, this Submission does not focus extensively on providing commentary on the Levy, as the Department of Water and Environment Regulation is undertaking a broad scale Levy Review (commenced in 2020). The Submission has been updated to state that Local Government opposes the application of the Levy to non-waste management related activities, such as funding State Government core activities. WALGA’s Policy Statement identifies that Local Government considers that the rate of the Waste Levy should be set by reference to a well-defined set of criteria, those supported are:

1. Capacity to fund the State Waste Strategy.
2. Capacity to achieve stated objectives.
3. Capacity to pay the Levy.
4. Capacity to Plan (at least a 5 year rolling schedule for the Levy is required).

Cr Blight’s comments and request to focus on material such as tyres and mattresses have been incorporated into the Submission. WALGA has reviewed the City of Kwinana’s Submission and thanks the City for the support provided in it for WALGA’s Submission.

Submission on the Review of the Waste Avoidance and Resource Recovery Strategy 2030

Closing Date: 5pm 11 July 2023

Foreword

The City of Kwinana welcomes the opportunity to respond to Waste Avoidance and Resource Recovery Strategy 2030 (Waste Strategy) Review and more particularly the opportunity to participate in creating an effective Waste Strategy by providing the following feedback.

Outlined in the City's previous submissions, the City has highlighted the fact that the MSW Recovery target of 70% by 2030 is not achievable without negatively impacting vulnerable communities and communities that are socially disadvantaged or have smaller populations with less resources to adapt more stringent recovery targets. 70% Recovery target in the current West Australian context is largely unachievable.

The European Union [municipal waste generation findings](#) suggests that a 70% or greater MSW recovery rate can only occur with the maturity of a full suite of waste recovery infrastructure encompassing composting and digestion, energy recovery from waste incineration, and a range of recycling/reuse schemes. In the EUs case it is estimated that composting only provides 18.3% recovery of wastes, whilst energy from waste and recycling recover a third of total wastes for each method. The observation proffered here is that input and support for all recovery infrastructure must be weighted equally. To reflect the current context the Waste Strategy must recognise that energy from waste, recycling and reprocessing, and composting infrastructure in Western Australia is not anywhere near a mature industry and is unlikely to mature prior to 2030.

Current and future Waste Strategies must demonstrate not only one need for mature waste recovery infrastructure but also outline how infrastructure is to be delivered. Associated Vision, Objectives and Targets of any Waste Strategy must recognise a careful balanced approach that supports all waste infrastructure options.

The City also has concerns around lack of local infrastructure, such as lack of FOGO processing capacity, and suggests that guidelines could assist to provide cohesion to local government State wide in regards to MUD's and Waste Management Plans.

Response to Discussion Paper:

1. Data and Performance:

What is the most important metric for tracking our performance? Where should we be focusing our collective efforts?

What trends and societal changes do you think are most relevant for consideration as part of the waste strategy review?

What do you think are WA's strengths and opportunities which we could harness to improve our waste and recycling performance? How do you think we can best harness these strengths and opportunities?

Performance:

The City of Kwinana supports the States annual reporting schedule and understands that data lag is unavoidable due to the annual reporting structure. Focus should be placed predominantly on percent of waste diverted from landfill, recovered and reused, showing relationship between recovery and reuse to perpetuate that individual participation does make a difference. Through regular community interactions, some members of the community are still under the assumption that recycling is 'pointless' as they believe recycled waste is landfilled. Transparently showing this data could assist to bridge this gap by statistically showing percentages of waste saved from the waste stream and reused.

Trends and Societal Change:

The inclusion of per household waste generation could be beneficial, allowing for easy comparison between local governments waste generation rates by household. This would allow the State to dive deeper into the statistics to see if factors attribute to higher or lower waste generation rates, i.e. income, demographics and so on.

Strengths and Opportunities:

WALGA's position is fully supported by the City in regards to opportunities as notable improvements in initiatives is evident with the implementation for Containers for Change and the WA Plan for Plastics. Opportunities to leverage on initiatives could further show that Western Australia is moving towards a sustainable, low waste, circular State. Opportunities could include the utilisation of CDS facilities to collect other problematic waste such as aerosols or E-Waste.

2. Vision, objectives, targets and principles:

Does the current vision in the waste strategy reflect your ambitions for a sustainable WA?

Are the current waste strategy's objectives helpful in driving priorities and informing waste management decisions by governments, industry and the community?

Do our current targets reflect the relative priority placed on each objective? Do we need additional targets to monitor performance?

Do you think current waste strategy principles adequately inform waste management decisions by government, industry and the community?

Should the updated waste strategy include additional principles?

Circular Economy:

The Waste Strategy Vision of a sustainable, low waste, circular economy in which human health and the environment are protected from the impacts of waste is supported by the City, however the vision of a circular economy does not flow into objectives and targets. Including targets around the use of recovered material or improving transparency where recycled items are processed then utilized and how this could improve public perception of the recycling industry.

Circularity reports similar to those produced through [Hunter Joint Organisation](#) could be greatly beneficial in WA, which could be created if financial assistance were to be provided

to associations such as [Circular Economy Western Australia](#) (CEWA). Without assistance, associations with potential may not progress due to limitations as the organisation currently is run mostly voluntarily.

Material Recovery Targets:

The Waste Strategy objectives, Avoid, Recover and Protect, are helpful in driving priorities and informing waste management decisions, however ambitious targets can be detrimental if targets are unachievable. As mentioned in prior submissions, Recover objective focuses on ambitious material recovery targets which, based on the City's [Three Bin Feasibility Assessment](#), are unachievable within the City of Kwinana whether 3-bin FOGO is implemented or not. This is addressed further in Focus Materials.

3. Priorities:

Is it useful for the waste strategy to identify focus materials? If so, which materials are most important for delivering the objectives and targets in the strategy?

What are the priorities for C&I waste? What types of actions could best support better C&I performance?

Are there other sectors (outside of MSW, C&D and C&I) that we should engage with to improve our waste and recycling performance?

How can we capture the innovation and expertise already in WA, for example in the mining and agricultural sectors, to improve our performance?

Focus Materials:

The City believes that identifying focus materials is essential due to the current lack of specialised processors in the State such as FOGO, soft plastic and glass processors. If the State wishes to encourage councils to recover waste from food and garden organics, more processors are required as current cost outweighs the minimal increase in resource recovery.

The City's [Three Bin Feasibility Assessment](#) found that FOGO costs approximately \$2M more per annum than a 2-bin system with an additional 21% material recovery (14% below State target), costing over \$95,000 per additional % increase in recovery, where GO costs just over \$57,000 per additional % increase showing it to be more cost beneficial. Increasing FOGO processors will result in a decrease in processing costs due to increased competition, resulting in more councils feeling confident transitioning onto a three bin FOGO system.

As packaging reforms and material bans continue, focus should be placed on ensuring cohesion between bans and recycling and reuse opportunities. Current plastic bans have resulted in alternative products to be utilised which, even though compostable, are not accepted by FOGO processors. This can be seen in the transition to compostable coffee cups which are currently not an accepted waste for FOGO processors.

Long term planning around bans and processing opportunities should be considered holistically, ensure recycling streams are futureproofed. Futureproofing the industry should occur prior to the waste item becoming an issue as technology and materials advance. There are current shortcomings with the recycling ability of solar panels and electric vehicle batteries, and likely more as technology advances.

Encouraging product stewardship, better packaging regulations and circular economy will improve financial return on recyclers making recycling of problematic waste more viable. This will be particularly beneficial for soft plastic and glass recyclers as the current cost to recycle these materials outweighs benefit for business.

4. Collection Systems:

What are the priorities for delivering better waste collection systems for the future? What opportunities do we have to implement these priorities in growing population centres?

How do you think we can leverage off existing schemes (such as Containers for Change) to further improve waste collection systems across WA?

Better Practice Guidelines.

The City of Kwinana is in the process of writing a Waste Management Guideline for new developments. It has become apparent that there are numerous discrepancies between local governments' Waste Management Guidelines in the Perth Peel region. State wide best practice guidelines for new developments, similar to [Verge Collections Guideline](#), would be beneficial to ensure consistency in Waste Management Plans State wide. These guidelines could provide direction to ensure adequate bin storage areas for all properties, allowing safe collection as well as providing recommendations on bin storage areas for larger developments to avoid future retrofitting due to lack of space for a three bin system. Laneways currently present a significant risk due to their limited verge space resulting in regular damage to structures such as fences due to inadequate space to present bins in these laneways. This could be avoided if a standardised approach was taken, guiding developers to provide space to be set aside for waste facilities.

Currently waste management in Multi-unit Dwellings (MUDs) is overlooked due to complexity and high levels of contamination. Guidance for MUDs would be beneficial to provide clear advice on this problematic service. Consistency State wide will ensure that transient residents do not have to learn new systems between Councils as Councils will utilise similar guidelines for MUDs, and will service these facilities in a similar manner.

Waste Local Law:

Last year the City implemented its Waste Local Law. During this process it was apparent that there is no flexibility to include additional material specific to the City's local context. This resulted in limitations in the Local Law as the City was unable to include bin store requirements, making previous requirements unenforceable within the City moving forward. Allowing flexibility will result in a more robust Local Law that will hold more value to local governments who implement this Local Law.

Leveraging Existing Schemes:

As mentioned in Strengths and Opportunities, current CDS facilities could potentially collect other problematic waste such as aerosols or E-Waste. The City fully supports WALGA's position in regards to leveraging existing schemes.

5. Regional Areas and Aboriginal Engagement

What sort of opportunities might be effective in delivering better waste outcomes in regional and remote communities, including remote Aboriginal communities?

How do we harness and apply the skills and experience of Indigenous Australians to an updated waste strategy? In addition, what approaches will support better waste management outcomes for Indigenous Australians?

WALGA's position is fully supported by the City, in recognition that our regional counterparts face significant challenges due to lack of local infrastructure.

As a City with a high proportion of Aboriginal Australians in the Perth and Peel Region, the City highly values Caring for Country and see opportunities to implement better practices, connecting correct waste management with Caring for Country. Aboriginal Australians typically have multigenerational homes making behaviours and habits easily transferable due to closeness in family structures. Empowering the community by producing waste information in language, while connecting the message to Caring for Country would achieve multi-faceted benefits, reinforcing action of correct disposal with positive environmental benefits, and connecting our community to Country.

6. Waste Levy:

Do you think further increases to the levy rate are required to reduce waste to landfill? How can the waste levy more effectively influence waste management practices and incentivise increased material recovery?

The City of Kwinana has provided an extensive Submission to the Department of Water and Environmental Regulation, as part of the Levy review process. The Levy should not be relied on as a mechanism to drive change on its own, it needs a framework to operate within and supporting programs to incentivise avoidance of waste and increased material recovery.

Waste managers currently pay the waste levy yet have no control over the production of the waste, other than attempting to influence consumer demand behaviors through education programs. Additional legislation, mandates, expanded product stewardship, product labelling and financial incentives, or other means, is necessary for the manufacture and import of products into Australia/Western Australia. This would have benefits when transitioning towards a circular economy.

The levy can play an important role in contributing to the Waste Strategy 2030 objectives and supporting a circular economy, however it is not effective in isolation. Additional money collected from the Waste Levy should be used to improve the recycling industry through providing grants or incentives to address focus material limitations.

7. Contingency Planning:

What sort of mechanisms do you think are effective in responding to sudden changes to waste generation rates or processing capacity?

WALGA's position is fully supported by the City as contingency planning should be pivotal. Production of an Emergency Waste Plan utilising lessons learnt from other States would ensure we are ready for when extreme events occur. This would ensure early recovery measures as well as post recovery measures.

If a large scale extreme event were to occur near one of the two Material Recovery Facilities (MRFs), it is unlikely that one facility could accommodate all recyclable materials from the Perth Metro (and surrounding) areas resulting in recoverable material being wasted. Encouraging additional MRF's will increase capacity locally if a facility is to not be operational for some time.

Submission on the Directions Paper: Review of Western Australia's *Waste Avoidance and Resource Recovery Strategy 2030*

July 2023

Acknowledgement

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 Noongar People where WALGA is located, and we acknowledge and pay respect to Elders past and present.

WALGA is committed to supporting the efforts of WA Local Governments to foster respectful partnerships and strengthen relationships with local Aboriginal communities.

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA).

The Western Australian Local Government Association (WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based organisation representing and supporting the work and interests of 139 Local Governments in Western Australia, comprising 1,215 Elected Members and approximately 22,600 Local Government employees, as well as over 2.5 million constituents of Local Governments in Western Australia.

Western Australian Local Governments vary greatly in:

- size, ranging from less than 1.5 to over 370,000 square kilometres,
- population, just over 100 to more than 224,000 people,
- the number of staff employed, from less than 10 to over 1000,
- in revenue received, which in 2019-20 ranged from just over \$2 million to just over \$226 million.

MWAC is a standing committee of WALGA and includes major Regional Councils (undertaking waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

Summary of Recommendations

1. Vision, Objectives and Targets

- That the State Government, in consultation with Local Government, develops a position and plan for a circular economy in Western Australia, which includes consideration of costs, benefits and options.
- That the 'recover' objective specifically includes the use of recovered material.
- That targets for recovery are included – for example % recycled, % composted, % waste to energy and % to landfill.
- Additional Targets be considered for the Strategy which provide a metric to measure waste reduction initiatives and litter/illegal dumping.

2. Building on opportunities

- Each Government Department publish an action plan which details the timeframe and actions each Department will take in relation to the Waste Strategy Vision, Objectives and Targets.

3. Data and Performance

- That to improve performance tracking, and determine the success of interventions, efforts be focused on ensuring waste management data is published in a timelier manner.
- That the Waste Authority undertakes an analysis of the composition of the Commercial & Industrial (C&I) waste streams, from various business operations, to inform waste avoidance and resource recovery solutions.

4. Principles

- In defining 'shared responsibility' for the implementation of the Waste Strategy, roles and responsibilities must be clearly understood and agreed to by all stakeholders.

5. Focus Materials and Waste Streams

- That the Waste Authority clarifies the aim of the focus materials in the Waste Strategy.
- That the Strategy include a targeted program for the C&I sector to assist businesses to reduce their waste and increase resource recovery.
- That the Waste Strategy includes an action to source data from the agriculture and mining industries to inform regional approaches to infrastructure development.
- That the Waste Authority considers the inclusion of mining and agriculture in a future Waste Strategy.

6. Collection Systems

- That accessibility requirements for collections be included in planning requirements for new developments to ensure effective waste collections can be undertaken.
- That existing collection schemes, such as Containers for Change, be leveraged to collect additional material, such as that covered by effective product stewardship schemes.

9. Contingency Planning

- That the Department of Water and Environmental Regulation reviews the work on Emergency Waste Planning which has been undertaken, lessons learnt from emergency events and approaches other jurisdictions are considering, in determining policy or regulatory options.

Introduction

WALGA welcomes the opportunity to comment on the Waste Authority [*Directions Paper: Review of Western Australia's Waste Avoidance and Resource Recovery Strategy 2030*](#). The Directions Paper is the first stage of consultation on the review of the *Waste Avoidance and Resource Recovery Strategy 2030* (Waste Strategy). Responses to the Directions Paper will inform the development of a draft Waste Strategy, anticipated to be released in late 2023 for a minimum 12-week consultation period. If the draft Waste Strategy is modified following the initial consultation, the Waste Authority will provide the modified draft Waste Strategy to all organisations which made a submission.

The Directions Paper provides an overview of current State Government commitments in relation to the Waste Strategy and the performance of the State against the current Waste Strategy targets. The current commitments include:

- Statewide communications and behaviour change

- Increased recovery of organics from Municipal Solid Waste streams
- Government procurement practice
- Review and update data collection and reporting systems
- Reviewing WA's waste infrastructure
- Waste Levy review
- Provide funding to promote the recovery of more value and resources
- Other commitments such as WA's Plan for Plastics and Container Deposit Scheme.

The Directions Paper includes the current data on recovery across all waste streams and identifies that although progress has been made in achieving the targets, there is still work to be done.

The [Waste Avoidance and Resource Recovery Act 2007](#) sets out the purpose for the Waste Strategy as:

to set out, for the whole of the State —

(a) a long term strategy for continuous improvement of waste services, waste avoidance and resource recovery, benchmarked against best practice; and

(b) targets for waste reduction, resource recovery and the diversion of waste from landfill disposal.

This Submission responds to questions relevant to Local Government included in the Directions Paper. These responses are based on WALGA's submissions to the 2018 [Consultation Paper](#) and [Draft](#) of the current Waste Strategy, other relevant Submissions and feedback from the sector.

1. Vision, Objectives and Targets

WALGA notes that the Waste Authority has recently undertaken consultation on a Draft State Waste Infrastructure Plan. Local Government has identified that it is essential that the final Infrastructure Plan and State Waste Strategy outcomes are aligned to ensure there is sufficient infrastructure to deliver on the Targets in the Strategy.

Does the current vision in the waste strategy reflect your ambitions for a sustainable WA?

Are the current waste strategy's objectives helpful in driving priorities and informing waste management decisions by governments, industry and the community?

Do our current targets reflect the relative priority placed on each objective? Do we need additional targets to monitor performance?

Vision	WA will become a sustainable, low-waste, circular economy in which human health and the environment are protected from the impacts of waste.		
Objectives	Avoid <i>Western Australians generate less waste.</i>	Recover <i>Western Australians recover more value and resources from waste.</i>	Protect <i>Western Australians protect the environment by managing waste responsibly.</i>
Targets	<ul style="list-style-type: none"> 2025 10 per cent reduction in waste generation per capita 2030 20 per cent reduction in waste generation per capita 	<ul style="list-style-type: none"> 2025 Increase material recovery to 70 per cent 2030 Increase material recovery to 75 per cent From 2020 Recover energy only from residual waste 	<ul style="list-style-type: none"> 2030 No more than 15 per cent of waste generated in Perth and Peel regions is landfilled. 2030 All waste is managed and/or disposed to better practice facilities

Vision

The Vision sets out the direction for the State, as a sustainable, low-waste, circular economy where human health and the environment are protected from the impacts of waste. There is a linkage between some of the vision, objective and targets in the Waste Strategy, however the use of recovered material is not specifically identified in any of the objectives or targets.

WALGA considers that further clarity is required on the environmental protection element of the vision. Local Government feedback was that the point source environmental impact of a waste facility was one element of environmental protection, but that the carbon impacts of waste upstream (in the generation of the waste) as well as downstream (in landfill) should also be considered.

Another key area where further work and certainty is required is the overall State Government position on a circular economy for Western Australia. A defined circular economy position and plan is required to back up the vision and identify the role of each sector in achieving a circular economy in Western Australia.

There has been only limited discussion outside of the waste management industry on what a circular economy is and if a move to a circular economy is an approach that would benefit the state. WALGA considers that a circular economy has the potential to bring significant benefits to the waste management industry in WA. However, detailed analysis of the circular economy in a WA context is required to understand and quantify the costs and benefits and options for moving to this approach. The work undertaken by [Green Industries South Australia](#) for example, included developing the case for circular economy for the State and has now progressed to driving the transition across multiple industries. Local Governments have identified that it is important not only to invest in collection and processing infrastructure, for example for Food Organic, Garden Organic (FOGO) collections, but also to consider the end markets for products and what opportunities exist to link with other Government initiatives such as increasing Urban Forest Canopy.

Recommendation: That the State Government, in consultation with Local Government, develops a position and plan for a circular economy in Western Australia, which includes consideration of costs, benefits and options.

Objectives

The current objectives 'avoid, recover, protect' are still relevant, however the actions undertaken in relation to the Waste Strategy have tended to focus on the 'recover' objective. There is an opportunity to emphasise the use of recovered material in the objectives. for example "Western Australians recover and use more waste resources".

Recommendation: That the ‘recover’ objective specifically includes the use of recovered material.

Targets

The current targets meet the legislative requirement of the WARR Act as they include waste reduction, resource recovery and diversion of waste from landfill. At a high level, only one of the targets - that relating to material being landfilled in Perth/Peel - is geographically specific –. The other targets apply to the whole state, which does not acknowledge the differences between the metropolitan and regional / remote areas in relation to capacity to implement better practice waste system.

Avoid – Until such time as economic growth can be decoupled from waste generation, a per capita figure does not provide a useful measure on the effectiveness of waste reduction initiatives.

Recover – Feedback from Local Government, and WALGA’s previous Submissions, identified that more specific targets for recovery would assist in clearly identifying the amount of material which should be processed using each option.

Protect - the focus is on the amount of waste disposed to landfill and waste facilities operating to better practice standards. Aside from these elements, there are other contributors to protecting human health and the environment, including the management of litter and illegal dumping.

Recommendation: That targets for recovery are included – for example % recycled, % composted, % waste to energy and % to landfill.

Recommendation: Additional Targets be considered for the Strategy which provide a metric to measure waste reduction initiatives and litter/illegal dumping.

2. Build on Opportunities

What do you think are WA’s strengths and opportunities which we could harness to improve our waste and recycling performance? How do you think we can best harness these strengths and opportunities?

Since the Strategy has been introduced there has been clear progress in achieving important initiatives, such as Containers for Change, the WA Plan for Plastic and large funding Programs for infrastructure which have built momentum and expectation. There has also been cross Government action, facilitated by the Strategy Action Plan, which identifies the requirements for each Department. Considerable work and consultation has been undertaken by the Department of Water and Environmental Regulation into waste reform measures, such as a recovered materials framework, however this work has yet to come to fruition.

The opportunity that WA has is:

- For the State Government to continue to take a leadership role in relation to its own operations by ensuring high level, across Government, commitment to the vision, objectives and targets in the Waste Strategy. This includes each Department having a Strategy Action Plan which identifies the actions required and the timeframe these actions will occur in. Local Government emphasised that Government Department procurement provided an essential opportunity for market development for a range of materials, including C&D and organics.
- For the Department of Water and Environmental Regulation to use the extensive consultation undertaken on the review of the Environmental Protection Act and waste

reform to develop a national best practice approach to regulation and support for the industry.

- To continue and enhance the collaborative approach in developing regulatory reform and initiatives, which has been facilitated by groups such as the Waste Reform Advisory Group.
- Leverage the success of existing Schemes, such as the Container Deposit Scheme, to show what effective product stewardship is and lead national discussion and action (for example, as identified in the recent Meeting of Environment Ministers [Communique](#) – WA is leading the national work on Tyre Product Stewardship).

Recommendation: Each Government Department publish an action plan which details the timeframe and actions each Department will take in relation to the Waste Strategy Vision, Objectives and Targets.

3. Data and Performance

What is the most important metric for tracking our performance? Where should we be focusing our collective efforts?

The targets in the Strategy, and tonnage recovered/landfilled, are the main metric currently used for measuring and tracking performance. However, as noted in the Directions Paper, the data being used is 2021-22. This lag makes it difficult to measure any intervention until several years after it has been implemented. One suggestion for measuring performance is to look at landfill composition, as that will provide a clear picture of what is currently being landfilled and provide areas to focus.

Feedback from Local Government indicated that data collection from waste from households and Local Government was relatively robust, as there has been significant focus on increasing recovery of MSW. However, for the Commercial & Industrial (C&I) waste sector there was very limited waste composition data and data that was available lacked the necessary granularity to assist in developing waste avoidance and resource recovery solutions. The need for further focus on C&I is also identified in Section 5 of this Submission.

The overall accuracy of waste data was an area identified for further focus by Local Government. Currently waste collection and recovery/disposal is only tracked for certain Controlled Waste. For State Government to fully understand waste flows, it was suggested that an investigation of waste tracking options used in the UK and EU be considered.

Local Government feedback also identified that the current online data reporting system for the sector could be further streamlined to improve speed and comparability of data.

Recommendations:

- That to improve performance tracking, and determine the success of interventions, efforts be focused on ensuring waste management data is published in a timelier manner.
- That the Waste Authority undertake an analysis of the composition of the Commercial & Industrial waste streams, from various business operations, to inform waste avoidance and resource recovery solutions.

4. Principles

Do you think current waste strategy principles adequately inform waste management decisions by government, industry and the community? Should the updated waste strategy include additional principles?

The principles identified in the Strategy are:

- Shared responsibility and partnership
- Innovation and growth
- Better practice
- Waste as a resource
- Intergenerational equity.

WALGA considers that the principles should be simple and straightforward, providing clarity on what the Strategy is attempting to achieve. The current principles meet this outcome and provide sufficient direction, however it is essential that how they will be embedded in the Strategy implementation is made clear. In particular, having a clear and agreed understanding of how the shared responsibility approach will be used to ensure all parties to the Strategy should be empowered to commit to implementation on an equal basis.

Recommendation: In defining 'shared responsibility' for the implementation of the Waste Strategy, roles and responsibilities must be clearly understood and agreed to by all stakeholders.

5. Focus Materials and Waste Streams

Is it useful for the waste strategy to identify focus materials? If so, which materials are most important for delivering the objectives and targets in the strategy?

What are the priorities for C&I waste? What types of actions could best support better C&I performance?

Are there other sectors (outside of MSW, C&D and C&I) that we should engage with to improve our waste and recycling performance? How can we capture the innovation and expertise already in WA, for example in the mining and agricultural sectors, to improve our performance?

Focus Materials

In the current Strategy the list includes Construction and Demolition (C&D), organics, metal, paper and cardboard, glass, plastics, textiles & hazardous waste. Given these represent a significant portion of the waste stream, it is not clear what the intent of the focus materials is. For higher tonnage materials, such as C&D and organics, their recovery will already be a focus because of the significant contribution to the targets in the Strategy. The focus materials could provide a way to prioritise other low tonnage high impact materials, such as Household Hazardous Waste.

At a National level, the Environment Minister publishes an annual list of priority products for product stewardship, this provides industry with notice regarding the Government's intent to investigate options and encourage industry. An alternative approach to including focus materials in the Strategy could be to publish a list of focus materials and approach – for example waste avoidance for food organics – which would provide the industry and Local Government with a focus (the priorities on the list could be the same for many years, as it may take time for change to occur). Other materials may be a priority for recovery, as they are more difficult to minimise, or the approach could be national product stewardship. Local Government has identified that electronic waste, packaging, mattresses and tyres are key problematic materials requiring additional action.

Recommendation: That the Waste Authority clarifies the aim of the focus materials in the Waste Strategy.

Commercial & Industrial

There has been very limited assistance provided to the commercial and industrial (C&I) sector, focus could include targeted program such as the NSW [Bin Trim Program](#), which assists 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.

Other Waste Sectors

In the non-metropolitan area, sectors such as agriculture and mining are often larger waste generators than Local Government. Coordinated effectively, significant opportunities could be realised in terms of job creation and improved resource recovery if these waste generators were engaged and participated in a regional waste program. For example, a localised hub could be used to aggregate and process local organics from agricultural, wastewater, MSW and C&I waste streams. Feedback from Local Government indicates that agricultural and mining wastes are often being buried or burnt on site and this could make data capture difficult.

At this time the Association does not support the expansion of the Strategy to include additional types and sources of waste, due to limited the progress on current waste streams and limited data on the waste streams from these sectors.

Recommendations:

- That the Strategy include a targeted program for the C&I sector to assist businesses to reduce their waste and increase resource recovery.
- That the Strategy includes an action to source data from the agriculture and mining industries to inform regional approaches to infrastructure development.
- That the Waste Authority consider the inclusion of mining and agriculture in a future Waste Strategy.

6. Collection Systems

What are the priorities for delivering better waste collection systems for the future? What opportunities do we have to implement these priorities in growing population centres?

How do you think we can leverage off existing schemes (such as Containers for Change) to further improve waste collection systems across WA?

Collection Systems

Local Government has identified that some of the inhibitors for collection systems include practical issues, such the need to ensure accessibility for waste collection is included in planning for new developments. As population density increases the need for specific programs and resources to improve waste management in Multi-Unit Dwellings is essential.

Recommendation: That accessibility requirements for collections be included in planning requirements for new developments to ensure effective waste collections can be undertaken.

Leverage existing Schemes

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. 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, as 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 covered by an [effective](#) product stewardship scheme which covers all the costs associated with collection, transport and recycling. This approach will also assist in ensuring these services are accessible across WA, even in areas with limited Local Government services available.

Recommendation: That existing collection schemes, such as Containers for Change, be leveraged to collect additional material, such as that covered by effective product stewardship schemes.

7. Regional Areas and Aboriginal Engagement

What sort of opportunities might be effective in delivering better waste outcomes in regional and remote communities, including remote Aboriginal communities?

How do we harness and apply the skills and experience of Indigenous Australians to an updated waste strategy? In addition, what approaches will support better waste management outcomes for Indigenous Australians?

Regional and Remote

To achieve better waste outcomes for regional and remote communities, WALGA considers a regional waste infrastructure plan should be developed that includes all waste streams, and focuses on local solutions. One option to assist with the development of this approach is through regional collaboration and engagement. WALGA is currently administering the Regional Climate Alliance Pilot for the Department of Water and Environmental Regulation and this approach provides a template for how region wide collaboration can achieve positive outcomes. Some Local Governments in regional areas have also identified that it is likely that landfill will continue to be their main option for waste management.

Non-Metropolitan Local Governments have identified that their residents often do not have the same opportunities to reduce their waste compared to the metropolitan area. For example, in some regional areas there is only one shop in town, or residents are not able to make low waste choices (for example bulk purchasing with no packaging). In developing waste reduction initiatives, an assessment of the feasibility of the choices presented to consumers in the current system is required. Successful waste reduction initiatives provide the community with information on how to change their behaviour as well as access to resources and infrastructure that allow them to do so.

Aboriginal experience and engagement

The review of the Strategy provides an opportunity to embed Aboriginal knowledge and approaches to Caring for Country and to expand the use of waste management as a career opportunity. For example, Containers for Change, through its procurement approach, has assisted in providing opportunities for employment and engagement. In the Kimberley region all refund points are provided by Aboriginal Corporations.

There is an opportunity for Local Government to increase engagement with those Aboriginal communities and people who receive waste management services from the Local Government. For example, the Shire of East Pilbara effectively engaged with their local communities and, with funding from the Waste Authority, developed educational videos by a local film maker spoken in the Martu Wangka language with English subtitles and created a waste and recycling guide with translations in Martu Wangka. This makes waste communication material relevant to the whole community.

8. Waste Levy

Do you think further increases to the levy rate are required to reduce waste to landfill? How can the waste levy more effectively influence waste management practices and incentivise increased material recovery?

WALGA has provided an extensive [Submission](#) to the Department of Water and Environmental Regulation, as part of the Levy review process. WALGA also has a clear [Policy Statement](#) on the Levy which articulates the position that all funds raised through the Levy should be used for strategic waste management purposes and that Local Government strongly opposes the application of the Levy to non-waste management related activities, such as funding State Government core activities.

The Levy should not be relied on as a mechanism to drive change on its own, it needs a framework to operate within and supporting programs to incentivise avoidance of waste and increased material recovery.

9. Contingency Planning

What sort of mechanisms do you think are effective in responding to sudden changes to waste generation rates or processing capacity?

During the COVID-19 pandemic, WALGA, worked with Local Governments that operate waste collection vehicles and private companies to develop a Mutual Assistance MOU. The intent of this document was to ensure that waste collections could continue if the workforce was significantly impacted by COVID-19. There are also intersects with Biosecurity management, for example the threat of Foot and Mouth Disease lead to DPIRD bringing together waste management companies and Local Government to undertake contingency planning. The private sector and Local Government have also actively cooperated to ensure ongoing service provision, for example when the Cleanaway Material Recovery Facility burnt down.

With funding from the Natural Disaster Resilience Program, WALGA undertook a project to identify a framework and approach for Local Governments to plan for, and respond to, waste from emergency events. Following WALGA's work, the State Government also undertook an emergency events waste project which had a number of recommendations.

Recommendation: That the Department of Water and Environmental Regulation review the work on Emergency Waste Planning which has been undertaken, lessons learnt from emergency events and approaches other jurisdictions are considering, in determining policy or regulatory options.

Conclusion

The current Waste Strategy has propelled change in how waste is managed in Western Australia, with a number of important initiatives being implemented. This includes Containers for Change, the WA Plan for Plastic and large funding programs for infrastructure. Reviewing the Strategy provides an important opportunity to build on this momentum and further increase public engagement. The key focus areas for the future include:

- Increasing the focus on waste avoidance, through evidence based programs for priority waste streams such as food waste, plastics and textiles.
- Undertaking engagement and developing opportunities for the Commercial & Industrial sector to reduce waste and increase recovery.
- Influencing the development of effective Product Stewardship Schemes at national level, for priority materials including electronic waste, packaging, mattresses and tyres.

- Coordination and support and for regional and remote areas to assist in developing regional infrastructure solutions to increase resource recovery and undertaking initiatives to reduce waste.