

Submission on the DWER Approved Methods for Mandatory Reporting under the WARR Regulations 2008



May 2019

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (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.

This Submission therefore represents the consolidated view of Western Australia Local Government. However, individual Local Governments and Regional Councils may have views that differ from the positions taken here.

Due to meeting schedules, this Submission is yet to be considered and endorsed by MWAC. The Department will be informed of any changes to this Submission following consideration by the Municipal Waste Advisory Council on Wednesday 26 June.

1. Introduction

The Association appreciates the opportunity to comment on the *DWER Approved Methods for Mandatory Reporting under the Waste Avoidance and Resource Recovery Regulations 2008* (Approved Methods). The Local Government sector has a well-established position on waste management data and information management through an endorsed Policy Statement¹. The Policy Statement identifies the importance of consistent waste management data, the constraints on Local Government in producing data, sector responsibilities with respect to data and key issues to be pursued to ensure data is reliable.

Considerable work has been undertaken by the Department on waste reform that will influence the application of the Approved Methods. This work includes:

- Local Government Waste Plans
- Mandatory use of weighbridges by landfill premises to calculate leviable waste
- Legislative Framework for waste-derived materials and initiatives associated with Waste Reform
- Improvements to the WARR Levy regime.

The release of the Approved Methods is a significant milestone. The Department previously consulted on the proposed amendments in a *Consultation Paper* in June 2016. This Submission provides comment on the degree to which themes from the *DER Consultation Paper* (June 2016) and the *DER Analysis of Stakeholder Submissions* (December 2016) have been incorporated into the Approved Methods. The Submission also comments on the material categories, calculation methods and barriers that will influence the uptake of, and adherence to the Approved Methods.

¹ Waste Management Data & Information Management Policy Statement (2010). WALGA. Available online. <https://www.wastenet.net.au/documents/2/waste-management-data-and-information-management-policy-statement>.

2. Use of Waste Management Data

Accurate data on waste management is central to informed decision making on policy and programs. As identified in the *WALGA Submission on the Consultation Paper* (August 2016), requests for information should be linked to a clear purpose, such as the identification of areas that can be improved through targeted programs. WALGA anticipates that the yet to be released Waste Data Strategy will clearly outline the way in which the Department intends to use the waste management data it collects.

Recommendation: That the Department specifies it's intended use for waste management data in the Waste Data Strategy.

The Association has worked with the Department over a number of years to provide constructive feedback on the Local Government Census and actively encourages Local Governments to participate. WALGA has used the Census data to inform the development of the Bin Tagging Program and the Better Practice Vergeside Collection Guide. Both of these initiatives were funded by the Waste Authority through the *Waste Avoidance and Resource Recovery Account*. WALGA has also used the Census data to assess the effectiveness of various waste management approaches.

By actively using the data provided by Local Government, the Department could provide an assurance to Local Government that its efforts in collecting data are valued and contribute to program and policy design. The timely provision of consolidated waste management data to Local Government is another way that the Department can support the sector in making decisions on the effectiveness of various waste management approaches. Local Government is subject to timeframes in which it must report data. As such, it is appropriate that the Department commits to a timeframe in which it will publically release waste management data. The Department must also commit to advising Local Government of any changes to the methodology used to extrapolate and report on data.

Recommendation: That the Department commits:

- **To a timeframe in which it will publically release waste management data, and**
- **Advises Local Government of any changes to the methodology used to extrapolate and report on data.**

3. General Comments

3.1 Liable Entities and Reporting Thresholds

WALGA is concerned that the time taken to develop the regulatory amendments, Approved Methods and supporting initiatives may have contributed to significant underreporting of waste through the Levy regime and/or the Recycling Activity Report. The most recent Recycling Activity Report (Figure 1) shows there has been a significant decline in the tonnages reported since the WARR Levy increased in the 2015/16 Financial Year.

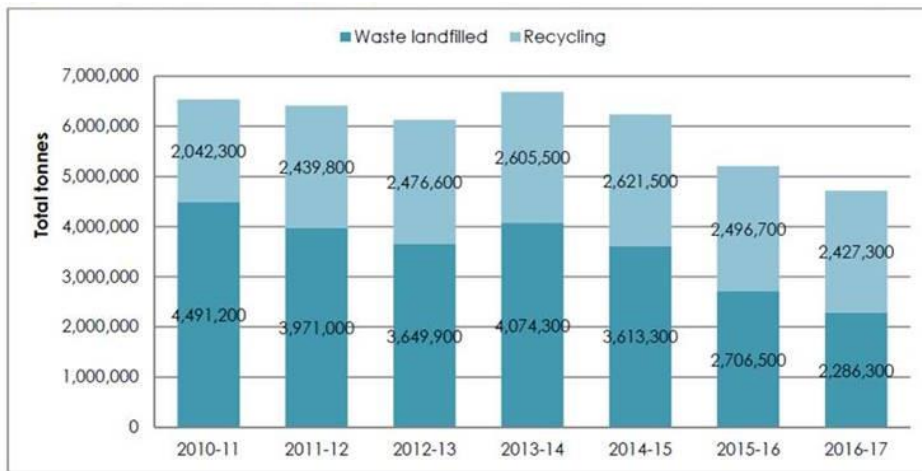


Figure 1: Reported total recycling activity and waste disposal for WA (Figure 1.1, Recycling Activity in Western Australia 2016-17).

While the approach outlined in the proposed amendments will provide clarity on the destination of Local Government waste, there is a risk that the destination of waste from other generators will remain unknown, as the activities of those processing this waste may fall below the reporting threshold. The definition of liable entities in the *Approved Method - Recyclers* requires further consideration:

“Liable persons are occupiers of premises, whether or not the person holds a licence in respect of the premises —

- a) if reportable waste is treated, processed or sorted at the premises for the purposes of reprocessing, recycling or energy recovery; and*
- b) if, as a result of that treatment, processing or sorting, at least 1,000 tonnes of reprocessed, recycled or recovered material is produced in a financial year at the premises that —*
 - i. needs no further processing and is ready for use as a production input or a final product; or*
 - ii. is to be exported from the State.”*

The Association is concerned that the definition does not address those operators that are receiving, sorting and disposing of waste in a manner that potentially causes environmental harm. For example, an unlicensed skip bin company could be sorting material and using it as fill on industrial land. Clarification is required on how the definition, and subsequently the reporting requirements - would apply in this type of situation.

The Association suggests that one way to address this issue, would be to lower the reporting threshold to 500 tonnes per annum to align with the Solid Waste Depot threshold in Schedule 1 of the *Environmental Protection Regulations 1987*.

Recommendation: That the Department clarifies the definition of liable entities and reconsiders the thresholds for recyclers / reprocessing facilities.

3.2 Consistency of Approach - Landfills

The rationale provided in the *DER Consultation Paper* (June 2016) as to why only those operators of non-metropolitan landfills receiving >20,000 tonnes of waste would be required to report, was that metropolitan landfill operators were already providing this information in line with the *Approved Manner for the WARR Levy* reporting requirements. The Department is currently reviewing the

approach outlined in the Approved Manner – as the volume based approach to reporting has been less than successful².

If the Department intends to allow the use of the volume based approach for larger non-metropolitan landfills, then the supporting documentation needs to be clear as to why this approach is fit for purpose. This request is made in the context that other landfills receiving leviable waste may be required to use a weighbridge (currently subject to consultation by the Department).

Recommendation: That the Department provides justification for why the volume based approach is appropriate for larger non-metropolitan landfills.

3.3 Definitions and Use of Consistent Terminology

To facilitate the collection of accurate waste management data, there is a need for terminology in the Approved Methods to be clearly defined and consistently used. Otherwise, there could be a varied interpretation as to what information must be reported by liable entities.

There are a number of key terms in the Approved Methods that could be interpreted differently by liable entities. For example; destination, dry recyclables, fate, hard waste, material, organic or green waste, processed, product, recovered, recycled, reused, residual waste, waste. To facilitate the collection of accurate waste management data, these terms need to be clearly defined.

A number of terms are used inconsistently in the Approved Methods. For example:

- Tonnes vs tonnes per annum
- Financial year vs reporting period vs annually
- Amount of waste collected (tonnes) vs total weight of waste collected.

For stockpiled material, there is a need to clarify if information should be reported on both processed and unprocessed waste. For example, a Material Recovery Facility may process a considerable amount of material which is stockpiled on site until there is enough to sell. Construction & Demolition Recycling facilities may receive, process and stockpile material for a similar reason. The situation would be different if a facility was stockpiling unprocessed material with no clear avenue for it to be recycled.

Recommendation: That the Department reviews the Approved Methods to ensure key terms are clearly defined and consistently applied.

3.4 Litter and Illegal Dumping

The *Approved Method - Local Government* does not include a requirement to report information on litter and illegal dumping. This information is currently reported to the Department through the Local Government Census. While WALGA understands that this dataset was not included in the *DER Consultation Paper* (June 2016), there is a risk that not including any mechanism to collect this information will have an adverse impact on the implementation of the WARR Strategy 2030, specifically strategy #23:

“Identify the data that is required to quantify and measure illegal dumping activity, collect the identified data on an ongoing basis and use the collected data to better target illegal dumping monitoring and enforcement activity.”

The WALGA Reduce Illegal Dumping Working Group has identified that consistent data on illegal dumping is urgently required to identify and communicate the scale of illegal dumping, and provide a solid basis from which to track trends across different land owners (Local Government and other

² Mandatory use of weighbridges by landfill premises to calculate leviable waste (May 2019). DWER. Available online. <https://der.wa.gov.au/our-work/consultation/126-open-consultations/525-open-consultation-mandatory-use-of-weighbridges-to-calculate-leviable-waste>.

agencies) and measure the effectiveness of different interventions. This information is also required to inform the compliance and enforcement activities of DWER, KABWA, and Local Government.

WALGA has previously approached Green Industries South Australia to determine if the Zero Environment Users System (ZEUS) could be used for this purpose. This system is easy to use and would achieve the outcomes of the WARR Strategy 2030, in terms of collecting information from both the Census and illegal dumping. There is a possibility that this concept could be incorporated into the DWER online reporting system.

Recommendation: That the Department reinstates a mechanism to report data on litter and illegal dumping.

Recommendation: That the Department bases the online reporting system on the South Australian ZEUS concept.

3.5 Review Mechanism and Record Keeping Requirements

WALGA requests that a review mechanism is included in the Approved Methods. For consistency, this could align with the review mechanism used in the *Approved Manner for the WARR Levy* reporting requirements. It would also be useful to include information on the record keeping requirements for liable entities. It was originally proposed that records needed to be kept for a five year period in the *DER Consultation Paper* (June 2016).

Recommendation: That a review mechanism and information on record keeping requirements are included in the Approved Methods.

4. Comments and Responses to Questions on the Approved Methods

While WALGA understands that Local Governments will be afforded the opportunity to propose alternate methodologies (as approved by the Department), it is imperative that the Approved Methods and supporting initiatives are designed to minimise operational disruption, and any increase in cost to Local Government. As the activities of a number of Local Governments cut across multiple categories of liable entities, the response to the questions posed in the three Consultation Papers have been consolidated in this Submission.

Is the annual Local Government Waste and Recycling Census template an appropriate reporting template?

WALGA considers that it is appropriate to continue using the Local Government Waste and Recycling Census template, given the level of familiarity with this approach. However, clarity is required on the ability for Local Governments to report using the Census template as a liable entity under the non-metropolitan landfill and recycler categories. The online reporting system could be configured to assign additional reporting categories to Local Governments that are considered to be different types of liable entities. The system could also be designed to automatically prefill data and sync directly with Local Government data capture systems and compare trends over time. This would particularly useful for Local Governments with limited resources allocated to input and analyse data.

Recommendation: That the Department clarifies if the Census template can be used by Local Government to report under multiple categories of liable entities.

Are the proposed special provisions suitable for smaller local governments?

WALGA supports the proposal to reduce the reporting requirements for Local Governments with a small population base. However, further clarity is required on the type of information that the Department would consider to be acceptable for a 'waste collection service audit report' for a Local

Government with a population of less than 5,000 (Section 9.1.2.1 *Approved Method – Local Government*). The proposal that an annual survey is carried out at unmanned sites for a period of four weeks each year, is not considered to be an efficient use of Local Government resources (Section 9.1.3.1 *Approved Method – Local Government*). WALGA suggests that the Department investigates an alternative approach. For example volumetric surveys at the beginning and end of a reporting period.

Further information is also required on the need for a Local Government with a population of less than 1,500 to verify or submit waste management data, as much of this could be pre-filled by the Department in the online reporting system.

Recommendation: That the Department provides clarity on the type of information to be included in a waste collection service audit report.

Recommendation: That the Department removes the requirement for bulk density surveys and investigates an alternative approach (e.g. volumetric surveys).

Recommendation: That the Department provides further rationale on the need for Local Governments with a population of less than 1,500 to verify or submit waste management data.

Are the proposed material categories practical and appropriate for the recycling industry, landfill industry and local government?

WALGA is of the understanding that the Department has developed the material categories with a view to improve the baseline level of information collected by liable entities, in a way that minimises operational impacts. The design of the online reporting system presents an opportunity for the Department to directly sync with Local Government data capture systems.

Consistency should be maintained across the Approved Methods to ensure information on the destination of the entire waste stream is captured. The current material categories have been consolidated from the *Landfill Waste Classification and Waste Definitions 1996 (as amended 2018)*, and the *Local Government Census* or the *Recycling Activity Report*. In designing the material categories, the Association suggests that the Department:

- Uses consistent material categories across all Approved Methods, with facilities indicating relevant inputs and outputs
- Accommodates the differences between inputs with mixed waste streams (e.g. putrescible, inert, co-mingled recycling) and outputs where mixed waste has been separated (e.g. paper, cardboard, bricks)
- Minimises duplication of reporting (e.g. align the material categories with those used under reporting requirements for existing licencing regimes)
- Clearly links the material categories to the purpose of collecting the data (e.g. to meet the reporting requirements of the National Environmental Protection Measure Used Packaging Materials (NEPM UPM) and assess the effectiveness of action on the WARR Strategy 2030 focus materials).

Liable entities may receive and process input material from a range of different sources. The design of the material categories and the online reporting system must take into account the variety of materials that can be delivered to a facility, including:

- Receiving a mixed load, sorting the material and transferring it elsewhere to be recycled / used / landfilled (e.g. Landfill, C&D Recycler, Transfer Stations, Material Recovery Facilities)
- Receiving and processing loads of source separated material (e.g. scrap metal recyclers, composting facilities)
- Receiving mixed loads for direct disposal to landfill.

For the output materials, there has to be a sufficient degree of granularity in reporting to ensure the information can be used to inform decision making and inform market development activities or other

market based interventions. There is also a need for a clear definition of when material is considered to be stockpiled, and recycled (refer to Section 3.3 of this Submission).

Local Governments are currently collecting a more detailed suite of information through the Census than what is proposed in the *Approved Method – Local Government*. Rather than changing Local Governments reporting requirements to 'dumb down' the data they collect, it is suggested that the Department reviews the existing data that is collected to determine the final list of material categories. WALGA has proposed a solution to this issue (including timeframes) in its response to 'barriers' (refer to page 8 of this Submission).

Are the proposed calculation methods to estimate the weight of waste received, disposed, leaving and stockpiled at your site clear / practical? If not, what further clarification is required

Approved Methods – all

The Approved Methods should be updated to specify that receipts from recyclers can be used to validate the weight of certain materials that are sent off site for further processing – as these transactions are based on weight.

The proposal that surveys are conducted for a period of four weeks each year, to determine the geographical source and waste stream of material entering and leaving landfills and recycling facilities is not considered to be an efficient use of Local Government resources (Section 9 *Approved Method – Landfills*, Section 10 *Approved Method – Recyclers*). WALGA suggests that the Department investigates an alternative approach, such as volumetric surveys at the beginning and end of a reporting period.

The Approved Methods could also be improved by clarifying material inputs vs outputs. Currently, there are limited connections between the information to be reported (e.g. Section 2 and Appendix A *Approved Method - Local Government*), and how it must be reported in other sections of the document (e.g. Section 4 Reporting format, Section 5 Material Categories and Section 6 Proposed Approved Methods).

Stockpiling is a significant issue. The reporting requirements and definitions for stockpiles must be carefully designed to facilitate the collection of accurate waste management data (this matter is further discussed in Section 3.3 of this Submission).

Recommendation: Amend the Approved Methods to allow for the use of receipts from recyclers.

Recommendation: Investigate an alternative approach to surveys on material entering and leaving the premises of a liable entity.

Recommendation: Amend the Approved Methods to clarify what information must be reported with respect to material inputs and outputs.

Recommendation: Amend the Approved Methods to include clear reporting requirements and definitions for stockpiles.

Approved Method – Recyclers

It is currently not clear why Section 7.1 of the *Approved Method - Recyclers* differentiates between compacted loads and loads over 1m³. Section 7.1.1 of the *Approved Method - Landfills* states that “Where a weighbridge is installed at the site, all loads of waste are to be weighed on the weighbridge at the time that they enter or leave the site.” This wording should be used to maintain consistency across the Approved Methods.

Recommendation: That the Department maintains consistency across the Approved Methods on the type of material to be weighed by weighbridges (where installed).

Approved Method – Local Government

The default rate of 45% of material diverted by Material Recovery Facilities (MRF) is inconsistent with the information provided to Local Government and reported through the Census (Section 6.2 *Approved Method - Local Government*). The financial impact of residual waste means that MRF operators are aware what their residual rate is, and have invested heavily to improve recovery rates. Advice provided by the operators of these facilities indicates that the rate of residual waste is a maximum of 15-20%. This is highly dependent on rates of contamination and the stability of market outlets for recovered materials.

There are a number of challenges associated with reporting the breakdown of material collected in the same collection route from public places, domestic and commercial sources. In some Local Governments, this information is not available due to the level and type of resources dedicated to waste management data. The default calculation listed in Section 6.4.1 and 6.4.2 of the *Approved Method – Local Government* could be updated to allow Local Governments to indicate how ‘full’ different types of bins are, along with presentation rates – where this information is available.

WALGA understands that reporting on the cost of providing waste and recycling services is intrinsically linked with NEPM UPM reporting. It is suggested that Section 6.6 of the *Approved Method – Local Government* is amended to differentiate between costs and charges. While it is useful to have a degree of consistency in reporting what various activities cost, it is currently not possible to report charges in a way that is comparable – as Local Governments make individual policy decisions on how to structure charges (and discounts). For example, a Local Government may choose to implement a form of ‘pay as you throw’ through their fee structure, or provide discounts and/or fully subsidised services to certain members of the community. Feedback provided by Local Government indicates there is no support for information on cost charges and rates to be publically reported, as this dataset it is not directly comparable.

Section 9.1.3.1 of the *Approved Method - Local Government* outlines the requirements for unstaffed drop-off sites where direct measurement of waste is not possible. WALGA considers the term ‘drop off sites’ to include both landfills and transfer stations. WALGA suggests that Local Governments with a population of less than 5,000, with a trench landfill, should be allowed to complete surveys at the beginning and end of the Financial Year to determine how much waste has been deposited. This approach would be easier to accommodate than surveys 4 times a year. During the consultation session it was noted that the amount of waste would compact over time and consequently this type of survey would not be accurate. However, a compacted waste rate could be applied to the volume of waste generated. As the amount of waste generated in these areas is small, the consequence of the waste generation rate being not entirely accurate is not significant.

Recommendation: Amend the default rate of material diverted by Material Recovery Facilities.

Recommendation: Amend the calculation method to allow for the designation of bin ‘fullness’ and presentation rates.

Recommendation: That information on cost charges and rates is not publically reported.

Recommendation: That Local Governments with a population of less than 5,000, with no weighbridge at their drop off site, are able to use volume as a measure of waste generation.

Are there any barriers that would prevent your organisation from using these calculation methods?

There are a number of operational considerations that will influence Local Governments' use and uptake of the Approved Methods and supporting initiatives. The level and type of available resources (staff, systems), the time taken to respond to multiple requests for information, and the availability of data from contractors have proven to be real challenges in collecting accurate waste management data. While the reduced reporting requirements for less populated areas will reduce this burden, there are a number of additional measures that would assist in addressing these challenges.

It is important that the Department provides Local Government with a sufficient lead time to either establish, or implement changes to its data collection practices and systems. This is particularly relevant for those Local Governments that are considered to be a liable entity across all three categories and/or haven't previously reported data separately on C&I and MSW. Local Governments have indicated that it will be problematic to submit the first report by 1 October 2020, given the Department's online reporting system will not be available until this reporting period. As the type and format of information to be submitted needs to be collected by Local Government from 1 July 2019, WALGA suggests that the Department adopts an approach where the data required for the first report is consistent to that of current Census. The Department could then review the data collected and determine what information is required to fulfil its needs. It is worth noting that there is an opportunity to sync directly with Local Government data capture systems. If the Department was to consider any changes to the current Census reporting template, it must provide at least 12 months' notice prior to the coming reporting period. This approach should be communicated to Local Government via the CEO notice.

Recommendation: That the Department retains the current Census reporting template.

Recommendation: If changes are required to the Census reporting template, the Department must provide Local Government with at least 12 months' notice to establish or implement changes to its data collection practices and systems.

Local Government is currently subject to a range of different requests for information, reporting periods and calculation methodologies from a range of Government agencies. This has led to an inefficient system of reporting that places additional costs on Local Government. The consolidation and/or alignment of data reporting requirements could allow for resources in State and Local Government to be allocated to other tasks. The scope of the waste management data that is currently reported by Local Government includes:

- Annual Local Government Waste and Recycling Census
- Recycling Activity Review
- Annual Audit Compliance Reports (as a license requirement)
- Waste Avoidance and Resource Recovery Levy
- National Pollution Inventory
- National Greenhouse and Energy Reporting.

There is a possibility that the regulatory amendments will increase the reporting burden on Local Government, as it currently provides services across all three categories of liability to the community and/or commercial customers. As raised in the *WALGA Submission on the Consultation Paper* (August 2016), there are reporting processes embedded in the *Local Government Act 1995* that would raise the profile of waste management data and assist in providing accurate and publically accountable data. Under the *Local Government Act 1995*, Local Governments are required to prepare an Annual Report for each Financial Year. In this Annual Report, statements of compliance are made against the reporting requirements of various Acts. A consequential amendment to the Regulations under the *Local Government Act 1995* could require that Local Governments report on whether they have satisfied their reporting requirements for waste. This is particularly relevant, given the transfer of auditing functions to the Auditor General provides an external audit function.

WALGA is concerned that the Department may seek to implement the regulatory amendments in a manner that contradicts the strategic objectives of the Department. WALGA seeks an assurance that the regulatory amendments will be implemented in a manner that does not contradict Strategic Objective 5 of the DWER Strategic Plan (Figure 2).

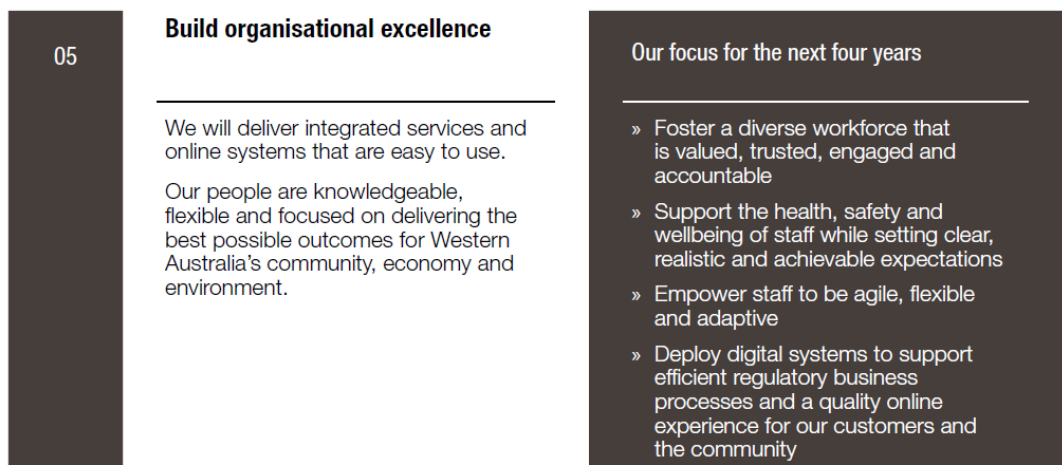


Figure 2: Strategic Objective 5 (DWER Strategic Plan 2018-21).

Recommendation: That the online reporting system is configured in such a way that Local Government is only required to report waste management data once.

WALGA welcomes the commitment by the Department to deliver a range of supporting initiatives such as workshops / training on record-keeping and reporting requirements. However, further information is required on the level of Departmental resources that will be allocated to data verification and compliance. This issue was raised in the *WALGA Submission on the Consultation Paper* (August 2016). WALGA remains concerned that the Department may not actively verify data – even though the Regulations empower the Department to do so. If there is no data verification, there is a risk that certain Local Governments and waste management operators will misreport figures, be this intentionally or otherwise. This can have a direct, negative public consequence on those that accurately report waste management data.

Recommendation: That the Department provides dedicated resources on an ongoing basis to verify data and undertake compliance activities.

Are the proposed default material densities appropriate for the recycling industry, landfill industry and local government?

It is important that the default values are as accurate as possible, given the possibility that many Local Governments will use this information to report waste management data. WALGA is not in a position to provide commentary on whether the default factors are accurate, as the Association has not undertaken this type of audit.

In commenting on the process used to generate the default factors, there appears to be differences between the default values for the weight of waste listed in the *Approved Method – Local Government*, and the *Approved Manner for the WARR Levy* reporting requirements. For example, the weight of waste received in small open trucks, large open trucks and compactors. There are also differences in the volume of compactor trucks in the *Approved Methods – Landfill and Recyclers* and the *Approved Manner for the WARR Levy* reporting requirements. Specific examples of these differences are provided in Table 1. The numbers highlighted in green and blue demonstrate inconsistencies between the methodologies.

Such differences could undermine the reliability of data and any future comparison of data between the various participants of the waste management industry.

Table 1: Comparison of default values in the Approved Methods and the Approved Manner.

Approved Method – Local Government			Approved Method – Landfill and Recyclers		Approved Manner – WARR Levy*		
Vehicle type	Assumed volume (m ³)	Assumed weight for mixed waste (t)	Vehicle type	Assumed volume (m ³)	Vehicle type	Category 63 volume (m ³)	Category 64 or 65 Weight (tonnes)
Car/ute	1	0.3	Small vehicle (car, ute, van, trailer)	1	Single axle trailer, ute, car and van	1	0.3
Small open truck	3	1.2	Open truck – small, 2 axles	3	Open trucks, gross weight <5 tonnes	3	0.9
Large open truck	10	5	Open truck – 3 axles	10	Open truck – 3 axles (“6 wheeler”)	10	3
Compactor garbage truck	8	5	Compactor truck – volume unknown	10	Compactor trucks <8m ³	4	1.7
-	-	-	-	-	Compactor trucks 8-12m ³	10	4.25

*This information is from the existing *Approved Manner for the WARR Levy*.

Recommendation: Maintain consistency between the vehicle types, volume and weight of waste across both the Approved Manner and the Approved Methods.

After reviewing the reference material used to determine the default bulk density values in the Approved Methods, it is clear that some of these values relate to uncompacted waste. This should be specified and reported separately to that of compacted waste (e.g. garden organics and mixed putrescible waste).

Recommendation: Specify if the default bulk density values are for compacted, or uncompacted waste.

Section 9.2 of the *Approved Method – Local Government* contains default waste generation rates and costs. It is recommended that the default costs are removed. If a Local Government does not have this information, then the default factors are of limited value for reporting purposes.

Recommendation: Remove default cost data in the Approved Method – Local Government.

5. Conclusion

Local Government appreciates the opportunity to comment on the proposed Approved Methods. As there have been a number of changes in how waste is managed and its final destination since the Department initially consulted on the proposed amendments in June 2016, there is a need to clarify the definition of liable entities and re-consider the reporting thresholds for recyclers / reprocessing facilities.

The timeframes for progressing the regulatory amendments, Approved Methods and supporting initiatives must accommodate a range of operational considerations such as the lead time to establish or implement changes to data collection practices and systems. Local Government understands the importance of collecting waste management data, and supports the initiative taken by the Department to gather a more cohesive dataset. However, Local Governments that are operating across multiple categories of liable entities have questioned what benefit the increased reporting requirements will bring.

An assessment of what data is already reported, and for what purpose, has raised concerns with the effectiveness of the Department's current approach to collecting and reporting waste management data. The development of an online reporting system presents an opportunity for the Department to configure future requests for information in such a way that Local Government only has to report this information once.

The Association looks forward to working with the Department as it progresses the regulatory amendments, Approved Methods and supporting initiatives to collect more accurate waste management data.