

Submission on the DWER Local Government Waste Plan Resource Kit



August 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.

This Submission was endorsed by the Municipal Waste Advisory Council on 9 October 2019.

1 Outcomes and Measure of Success

The Association appreciates the opportunity to comment on the Department of Water and Environmental Regulation (DWER) Local Government Waste Plan Resource Kit and acknowledges the significant effort in developing these documents. The development of Local Government Waste Plans provide an opportunity to align Local Government waste management activities. While MWAC is supportive of the concept of Waste Plans it is important that the delivery of the plans minimises administrative and reporting burden on Local Government. In commenting on the Waste Plan it is important to be clear on the purpose of the plans, how they will be executed and what a successful plans looks like. It is also important to be clear on what the plans are not – a general data gathering tool for the Department.

Purpose of Waste Plans

- Meet requirements of the Waste Avoidance and Resource Recovery (WARR) Act
- Map current Local Government performance, in relation to Targets (Avoid, Recover, Protect) in the WARR Strategy
- Identify what Local Government performance needs to be to meet the Targets
- Identify ways for Local Governments to achieve the Targets in the WARR Strategy
- Provide State Government with a degree of confidence that Local Government is committed to achieving the Targets and have sufficient strategies in place to do so.

Execution of Waste Plans

- Minimise duplication of effort by both Department of Water and Environmental (DWER) and Local Government – information provision and reporting
- Short and to the point
- Align with Local Government Reporting and Governance requirements (fit with Local Government Act and review requirements).

Measures of Success

- The outcomes achieved, the Targets in the Strategy are met
- The Plan is referred to and used.

Regional Council Waste Plans

It has been raised by Regional Councils that a Waste Plan template for Regional Councils is also being developed. Further discussion and consideration on this is needed, as Regional Council operations vary considerably and many waste related activities are carried out by the Regional Councils individual Local Government members. If the Regional Council has an existing Waste Plan, this should be considered by DWER, rather than requiring a new document. All Regional Councils have indicated they had waste plans currently in place. Any Regional Council waste plan template should ensure there is no duplication between Local Government Waste Plans and Regional Council. Instead the Plans should align. If the Regional Council is undertaking the waste education function for the Local Government that would be outlined in the Regional Council plan rather than in each Local Government Plan. The scope of the Regional Council Waste Plan would need to be flexible as Regional Councils operations vary. It is considered reasonable that a Regional Council with operational / education functions have a plan in place, however if a Regional Council is not providing these services then the development of a plan would be unnecessary.

2 Guidance Document

Currently, the following Tools form the basis of the approach in the Guidance document:

- Waste services – kerbside, vergeside and drop off
- Waste infrastructure
- Behaviour change programs and initiatives
- Policies and procurement
- Data collection

The Association considers that some of the tools will be relevant across multiple areas of activity. Therefore an alternative approach is suggested where the focus of the plan is waste services. Currently the document is set out in line with the Waste Strategy, which makes the links between the activities clear. However, from a Local Government waste planning perspective it would be more straightforward to focus on the services the Local Government delivers and how these will be used to meet the Targets in the Strategy. This will reduce the complexity of the document and allow clear measure of how the Plan is progressing to be included. Enablers for the implementation of the plan are then:

- Waste infrastructure
- Behaviour change programs and initiatives
- Policies and procurement.
- Data collection.

In relation to structuring the Guidance document, the suggest approach is to focus on the different areas of Local Government service provision.

| Activity area | Strategies to achieve the Target |
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| Waste Avoidance – internal focus | The Strategies could be grouped under: <ul style="list-style-type: none"> • Waste infrastructure • Behaviour change programs and initiatives • Policies and procurement. • Data collection. |
| Waste Avoidance – external focus | |
| Kerbside – Waste | |
| Kerbside – Recycling | |
| Kerbside – Organics | |
| Verge Collection – hard waste | |

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| Verge Collection – greenwaste | |
| Drop off | |
| Littering | |
| Illegal Dumping | |

Some general editorial comments:

- To streamline the Guidance document, it is suggested that instead of recreating the template within the Guidance document a reference to the template and the section of the template be included.
- This is a guidance document for Local Governments developing waste plans, images are not required unless they specifically relate to the plan. If Local Governments want to include images in the Waste Plans it is likely these images will relate specifically to the Local Government and their community.

In relation to the Guidance document, specific feedback has been provided in Table 1.

Table 1: Comments on the Guidance Document.

| Section | WALGA comment |
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| 1.4 Integrated planning and reporting framework | Feedback is being sought from the WALGA Governance Team. |
| 2.1 Initial development of waste plans | <p>During the consultation sessions DWER indicated the Director General sign off on the Plans was a requirement of the WARR Act.</p> <p>Feedback is being sought from the WALGA Governance Team on the processes suggested in this section for engagement.</p> |
| 2.2 Annual reporting requirements | The ultimate measure of success for the Waste Plans is if progress is being made towards the achievement of the Targets. Reporting requirements for Local Governments in relation to the Waste Plans should be include in the Local Government Census. It is suggested that through this mechanism Local Governments be asked if their waste plan is being implemented as approved – if the Plan is being implemented as approved, then no further information is required. This Plan will include the key steps to achieving the Targets in the Strategy. If the Plan is not being implemented as approved the Local Government could be requested to provide additional information as to why. The DWER is measuring and reporting on individual Local Government performance publically, through the MyCouncil website, therefore the Local Governments progress towards the Targets is being publically tracked. |
| 3.3 Protect | Litter Prevention Strategy for Western Australia – this strategy is due for review as it ends in 2020. It will be difficult for Local Governments to align Litter and illegal dumping strategies to this document as it is likely to be replaced during the time the Waste Plans are being developed. In the Guideline it indicates that there are “a number actions in the Litter Strategy which local governments contribute to” – these are not necessarily actions in the Litter Strategy, they are a combination of strategies, actions and performance indicators. For example Strategy 2.2 Assist local governments to develop local litter prevention and litter recycling strategies. This is represented as an action in the Guideline, rather than a strategy which KABC would need to assist the sector to develop. |
| 4 How to complete Part 2 – implementation plan | It is useful for the Better Practice Guidance currently developed, or under development to be identified. Table 8 – commercial waste services are included along with Local Government waste management. Commercial waste services, although sometimes provided by Local Government, may require a different range of services and approaches compared to households and therefore would need |

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| | to be subject to different guidance. In the absence of Waste Authority advice, WALGA has a Better Practice Guideline – funded by the Waste Authority – on verge collection services which could be included. There are limited examples of Waste avoidance / reuse programs, links to Programs such as Plastic Free July and the Garage Sale Trail could also be included. Also Keep Australia Beautiful Programs, such as Clean Marine. |
| Appendix C | The proposed reporting requirements for the Waste Plan are excessive, see earlier comments regarding the level of data reporting necessary. Reporting against every action in Plan is likely to be a considerable additional burden on Local Government and unnecessary, as they key issue is whether the Local Government is progressing towards the Targets. |

3 Template

Checklist Part 2 – in the Part 3 of the Waste Plan - provides a concise overview of what the plan should include. This approach is in line with the outcomes focused approach which the Association supports, rather than the measure of success being the process followed.

The Association strongly recommends that the Waste Plan Template be simplified, and as with the Guidance structured in relation to Local Government Services. It is important that it is clear that the Waste Plan is not a data collection exercise – as Local Governments are reporting via the Local Government Census on a considerable range of information.

Suggested Plan structure

| Activity area | Current Performance | Target - 2025 | Strategies to achieve the Target | Timeline for Strategies |
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| Waste Avoidance – internal focus | | | The Strategies used to achieve the Targets <ul style="list-style-type: none"> • Waste infrastructure • Behaviour change programs and initiatives • Policies and procurement. • Data collection. | |
| Waste Avoidance – external focus | | | | |
| Kerbside – waste | | | | |
| Kerbside – Recycling | | | | |
| Kerbside – Organics | | | | |
| Verge Collection – hard waste | | | | |
| Verge Collection – greenwaste | | | | |
| Drop off | | | | |
| Littering | | | | |
| Illegal Dumping | | | | |

In relation to the Guidance document, specific feedback has been provided in Table 1.

Table 2: Comments on the Template.

| Section | WALGA comment |
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| 3 Avoid | Inclusion of both a graph and table is not needed. The Table is sufficient as it shows current performance and the benchmark for the Local Government. Further clarification is needed on if waste generation includes waste and recycling or waste only. The approach of only including MSW waste generation is supported. As the Strategy Target relates to per capita, it is suggested that only this data be included. |

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| | <p>Table 2 needs additional clarity that the baseline being measured against is 2014/15 and whether the Local Government needs to achieve a 5% reduction on their own 2014/15 level or the State Average.</p> <p>Table 3, includes both targets and population projections this needs to be labelled consistently (Table 2 includes Forecast/Target).</p> |
| 4 Recover | This section could be combined with section 6 on Local Government services. |
| 5 Protect Better Practice | Better Practice information should be presented so that it aligns with Local Government services. |
| 5 Protect Littering and Illegal Dumping | <p>Littering and illegal dumping need to be clearly defined as the type of interventions is likely to differ.</p> <p>Table 5 The Association strongly opposes the inclusion of the infringements as a measure of littering or illegal dumping. These are not measures of litter and illegal, but measures of how many complaints have been received by the Local Government and infringements issued. Low or high levels of complaints may be received for many reasons – some communities may have high levels of littering or illegal dumping yet not feel empowered to complain. The number of infringements issued may be a function of resourcing rather than number of instances, lower levels of infringements could reflect staff turnover and under-resourcing rather than lower levels of littering / illegal dumping. The only measure in place currently is the National Litter Index (NLI), although there are some issues with how this is implemented it is at least consistently applied.</p> <p>Table 6 See previous comments on State Litter Strategy and the confusion of strategies, actions and reporting measures. The Association strongly recommends removing the questions in Table 6, the intent of the Waste Plan is to track Local Governments progress towards the Targets, not a data collection exercise. The only consistent measure of litter is the NLI – to ask Local Governments whether litter is increasing or decreasing is almost entirely a subjective assessment rather than an evidenced based response. Sustainability Victoria has implemented a funded Program for litter which provides tools and benchmarks for these type of issues. There is no indication in the Guidance document that this type of approach is being developed for WA.</p> <p>Training – currently WALGA is not aware of any training provided in this area- KABC was undertaking this in the past on a casual basis. WALGA has an action from the RID Working Group to identify future training needs for Local Governments in this area.</p> <p>WALGA has written to the Waste Authority identifying the need for this type of data to be collected consistently across Local Government and State Government entities. The response received on this issue does not indicate a timeline for the implementation of such as approach therefore it is not considered appropriate for this to be included in the Waste Plans at this time. There are future opportunities for this data to be consistently collected to inform Statewide initiatives.</p> <p>For this section of the Waste Plan the Association suggests that the Local Government be asked to list the actions they are taking to contribute to the towards zero littering and illegal dumping targets. This can include a range of activities, such as enforcement but also the provision of gross pollution traps.</p> |

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| <p>6 Local Government waste management activities</p> | <p>Table 10 presents the information regarding Local Government services in a clear way, linking the Local Government recovery rates to better practice and the target the Local Government will need to achieve. It will be important to ensure the terminology aligns with reporting requirements (approved methods) and Strategy.</p> <p>Table 11 relates to compositional audit data for waste services, however it is not clear why this would be included in the plan. This is data that may inform the Local Governments decision and direction regarding services but is unlikely to be needed in the plan.</p> <p>Table 12 HHW is only relevant to 13 Local Government with facilities and can be included in drop off options. Temporary Collection days are not a guaranteed part of the Program. The costs reported are likely to be to the HHW Program, rather than the Local Government. It is suggested that this specific section be taken out and Local Governments can include HHW as part of drop off.</p> <p>Table 13 relates to any waste infrastructure the Local Government has and includes a significant level of detail that would potentially be captured by the section on waste services, under drop off. The only requirement for infrastructure relates to contributing to the material recovery targets and ensuring it is operating to Better Practice Standards by 2030.</p> <p>Table 15, this information on the terms of Local Government contracts can be included with the Local Government services information.</p> <p>Table 16, Local Governments are required to review Local Laws within a certain time period after implementation.</p> <p>Table 17, it is not clear how these planning instruments relate to the achievement of the Targets. Often these are needed as part of Better Practice.</p> <p>Table 18, Sustainable Procurement – what target does this relate to?</p> <p>Table 19, this table identifies behaviour change programs and initiatives and also includes evaluation of the Programs. While these are necessary elements to a good behaviour change approach, it is not clear why these would be in waste management plan. The outcomes of the evaluation process would be the actions included in the plan.</p> <p>Table 20, these questions seem to be general data gathering exercise about how Local Government collect/use data rather than a necessary part of a waste plan. If the Department wants to know this, a general survey as part of the approved methods would be a better way to find out. If the intent is to prompt Local Governments to use data, then another approach – linked to funding - would be the preferred approach. With the new compulsory reporting, better data will be available for use by the Department.</p> <p>Table 21, it is not clear what information is required to answer the first two questions in the table. For example ‘Strengths, successes, achievements of Waste Strategy targets or objectives’.</p> |
| <p>Part 2 – Implementation Plan</p> | <p>See previous comments on structure of the Waste Plan. The implementation plan is the key element of the Waste Plan as it identifies how the Targets will be met.</p> |

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| Part 3 – Self assessment checklist | The first part of the check list is not an outcome based approach, it focuses on process (i.e. completing the tables in the document). |
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4 Conclusion

Local Government waste plans provide a good opportunity to align approaches to waste management and identify the actions Local Governments can take to contribute to the achievement of the State Waste Strategy Targets. The Department has put a considerable amount of work into the development of the Waste Plan Guidance and Template. The Association has suggested in this Submission that the Guidance and Template need to be streamlined and align with Local Government service provision – as these are the activities which will contribute to achieving the Targets in the Strategy. There are a range of other programs which target waste avoidance or reuse which could be included in the Guidance.