

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’ 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.