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Customer Ref :  
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**All communications**  
to be addressed to:  
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WARR Act Review  
Department of Environmental Regulation  
Locked Bag 33  
**CLOISTERS SQUARE WA 6850**

Dear Sir/Madam

**WASTE AVOIDANCE AND RESOURCE RECOVERY ACT 2007 - REVIEW**

Attached please find the City's submission in respect of the review of the Waste Avoidance and Resource Recovery Act 2007 (the WARR Act).

The City appreciates the opportunity to make a submission in respect of this important legislation review and looks forward to the process making positive changes to waste management practices across the State.

Yours faithfully



**R J LUTEY**  
**DIRECTOR TECHNICAL SERVICES**



**CITY OF BELMONT SUBMISSION**  
**WASTE AVOIDANCE AND RESOURCE RECOVERY ACT 2007 - REVIEW**

**INTRODUCTION**

In making its submission on the review of the Waste Avoidance and Resource Recovery Act 2007 (the WARR Act), the City of Belmont has reviewed the WALGA draft submission and held discussions with the Eastern Metropolitan Regional Council (EMRC).

The City is generally supportive of both the WALGA and EMRC submissions but makes the following comments on its own behalf.

**GENERAL**

That the WARR Act focuses on local government is appropriate, as Municipal Solid Waste (MSW) makes up over one quarter of the waste stream and nearly 30% of waste going to landfills. However, with more than 70% of the waste stream being made up of Commercial and Industrial (C & I) 30% and Construction and Demolition (C & D) over 40%, it is apparent that there is an opportunity being missed if the WARR Act does not better address these two waste streams.

The WALGA Waste Vision Paper, which was formulated following consultation with Local Governments, Regional Councils and Elected Members', provides a plan of how the State Government can work with the waste sector and particularly local governments, to achieve positive outcomes for all parties. The paper recommended, amongst other things, a greater role by the State Government in providing an integrated waste management system, improved governance and greater guidance for Regional Councils. It must be acknowledged that to divert more waste from landfill and provide appropriate infrastructure to deal with projected increases in waste generation, a more coordinated approach is needed. The Paper provided a model to reform the sector which identified a number of potential additional roles for the State Government.

**REGIONAL COUNCILS**

The City of Belmont is a founding member and has been a long term supporter of the EMRC which is acknowledged as a model of what a Regional Council can achieve. Notwithstanding the delays in implementing its resource recovery projects, a delay caused by the State Government Local Government Reform process, the EMRC is a recognised industry leader. It has a successful, well managed and proactive waste management business and in addition, provides quality regional development and environmental services to its member Councils. Future plans include resource recovery facilities at Red Hill (major facility) and Hazelmere (resource recovery park). The EMRC submission details their activities more fully.

The EMRC is hindered by the lack of borrowing ability of Regional Councils, tender regulations, governance, investment certainty and representation on the EMRC Council. The State Government needs to address these issues in consultation with Regional Councils if any new regional structure is to be successful. In the meantime, and until there is a clear and agreed better way forward, regional waste management needs to remain with the current Regional Councils.



## **INFRASTRUCTURE**

While infrastructure such as Material Recovery Facilities (MRF), alternative waste treatment facilities and composting plants are relatively common, thermal treatments are not and the City is firmly of the belief that they have an important part to play in any contemporary integrated waste management system.

The City is pleased that the EPA and the Waste Authority have informed the Minister on the environmental and health performance of thermal options and that the Waste Authority has published its "Waste to Energy Position Paper 2013". This paper comments that there is little evidence that these plants pose a risk to health or the environment. Thermal plants are to become a reality with Phoenix Energy funded by private industry with a commitment from local government being the long term delivery of their waste.

## **WARR ACT REVIEW DISCUSSION PAPER**

The City supports the below proposal in the Discussion Paper subject to the Waste Groups, in the first instance, being the current Regional Local Governments:

*"It is proposed to provide for statutory Waste Groups with compulsory local government membership. Each Group will be required to operate in a manner that is consistent with a statutory waste infrastructure plan (see below) and targets in the Waste Strategy under the WARR Act. The role of Waste Groups would be to coordinate the procurement of waste processing services to ensure that appropriate services are acquired at least costs and that competition maximised.*

*This approach removes investment uncertainty and lack of commitment from local governments, and ensures Waste Groups deliver services consistent with the Waste Strategy and a waste infrastructure plan. It also recognised and broadly aligns with the current position for the local government sector and provides increased certainty for local government investment and a clear role for industry. It would require amendments to the WARR Act and the Local Government Act 1995.*

*The model outlined above will be considered for the Perth and Peel regions and may be expanded into non-metropolitan area to achieve similar waste performance in a staged and sustainable manner.*

*Additional mechanisms are proposed to ensure the effectiveness of the waste infrastructure plan, including providing that it is statutory; and ensuring that Waste Group are required to align their plans, waste services and contracts with the waste infrastructure plan, Waste Strategy targets and codes of practice. Waste infrastructure plans are not intended to replace environmental and planning approval processes as these relate to waste infrastructure development."*

## **DESIRED OUTCOMES – CITY OF BELMONT**

The City of Belmont wants to ensure levels of service for its residents including:

- Best practice kerbside and verge collection services (the City currently uses skip bins for the latter) and;
- Convenient and comprehensive drop off facilities for "other" waste.
- Improve community knowledge and understanding of how their disposal of waste (ie minimising contamination) impacts the effectiveness of the process.
- Environmentally sound waste practices.

## **DESIRED OUTCOMES - WALGA**

WALGA will provide high quality advocacy, coordination, program delivery and information services as well as working on coordination between Regional Groups. This will continue however; the MWAC structure may need to be modified to ensure local government retains a strong interest in waste management.

## **DESIRED OUTCOMES – EMRC**

- Continue to provide the essential services of waste management for member local governments at a regional level.
- Work with government to develop a statutory waste infrastructure plan and improve waste governance across the sector.
- Continue to lead the way in waste management provision and innovation.
- Perform the functions of a Regional Waste Group with compulsory local government membership.

## **THE WAY FORWARD**

The Vision Paper identifies that “regional organisations” should develop their infrastructure in line with the State Waste Infrastructure Plan. This is supported, subject to the content of the Plan when it is eventually released, however the Regional Councils should be these “regional organisations”. Moving to a three region structure for Regional Councils is a sensible progression and an appropriate way to ensure the strategic location of major waste facilities across the metropolitan area.

The City is not convinced that there will be many “economies of scale” in going to a regional approach for kerbside services and bulk rubbish verge collections but it is desirable to standardise service, as best that can be done, in order to give clear and consistent messages to all communities. A regional approach to community engagement and education on waste and recycling matters is supported and currently provided to Belmont Communities through the EMRC.

## **RECOMMENDATIONS AND CONCLUSIONS**

In summary of the submission, the City of Belmont recommends and concludes that:

1. The State Government increase the hypothecation of WARR levy funds to improve strategic waste management outcomes.
2. That the State Government urgently, and in consultation with Local Governments, adopt a strategic waste infrastructure plan to guide Local Government investment and decision making and establish an overarching Waste Management Group to facilitate the implementation of the State Waste Strategy.
3. The State NOT consider creating “Statutory Waste Groups”.
4. Waste management be undertaken by Regional Local Government and that the number of Regional Local Governments be reduced to three which together cover the metropolitan area.
5. It be compulsory for Local Governments to be a member of a Regional Local Government.
6. The review of the WARR Act be expanded to address C & I and C & D waste streams.
7. Extended producer responsibility and container deposit schemes be progressed.



## **DESIRED OUTCOMES – LOCAL GOVERNMENT**

As stated in the WALGA submission, in considering changes to the model for waste management, the following are important:

- Cost effective service to ratepayers to achieve desired social and environmental outcomes at the best price.
- Metropolitan wide coordination of waste management to achieve service delivery outcomes.
- Certainty of the operating environment for the next up to 20 years to give the private sector the confidence to invest in expensive facilities.
- Use the available extensive local government experience in the area to strengthen the decision making process.
- Optimisation of existing infrastructure and resource to ensure effectiveness waste management.
- Standardisation of collection systems to best practice and ensure there are no mixed messages across the community.

## **DESIRED OUTCOMES – STATE GOVERNMENT**

The City strongly recommends to the State Government to:

- Establish an overarching Waste Management Group to guide and facilitate implementation of the State Waste Strategy.
- Increase the hypothecation of funds raised through the WARR Levy to facilitate strategic waste outcomes. This requires a major commitment of funds on a long term basis, including sufficient funding to ensure that necessary infrastructure is in place to meet Waste Strategy targets.
- Use the Extended Producer responsibility provision of the WARR Act to help control waste creation and treatment, including engaging with the C & I and C & D sectors to help deal with these large waste streams.
- Commit to Container Deposit Legislation (CDL) like those so effectively used in some of the eastern states.
- Urgently adopt a Strategy Waste Infrastructure Plan to inform and guide local government investment and decision making. A plan for waste management across the metropolitan area (at least) is essential in order for waste reduction goals to be met and such a plan needs to be developed in consultation with all elements of the waste sector.

## **DESIRED OUTCOMES - C & I AND C & D WASTE**

- The review of the WARR Act needs to ensure there is appropriate emphasis on the C & I and C & D waste streams to ensure positive environmental outcomes for the community.
- Engagement with waste generators to assist in development of markets and to ensure appropriate waste management practices are in place.