

Environmental Health Australia (WA) - Submission on WARR Act 2007 Review

Part 3: WARR Act reform proposals		
3.1	Local government waste operations	
	Performance and coordination of waste flows	
		<ul style="list-style-type: none"> Market research is required to determine potential markets (end users, quantities) for recycled material derived products. A resource supply mapping exercise should also be completed for each material stream. To ensure a viable coordination of waste/recycling operations, the resource supply and respective markets should align – enabling the private sector to develop the business of processing waste to end-product markets.
		<ul style="list-style-type: none"> Setting targets for industry groups (local governments, MRWA, etc) to use recyclable material is warranted provided it is adjusted annually so that the committed amount of recyclable material does not exceed around 30% of the capability of the recycler to supply the material. This would enable the agency to utilise other sources of material if the price of recyclables is too high. The recycle material supplier would be able to supply up to 30% but for it to supply more, it needs to keep its price competitive.
	Waste Group membership	
		<ul style="list-style-type: none"> The proposed changes may have implications for some local governments under waste management collection and processing arrangements given that they already have existing arrangements in place.
		<ul style="list-style-type: none"> Local governments that are currently members of 'waste groups' such as the Eastern Metropolitan Regional Council (EMRC) which provides services in waste management and regional development. It is a model of successful collaboration that has initiated projects that deliver real benefits in the region. It is considered that the EMRC is a workable model and that existing important roles and functions of the EMRC may be expanded to provide other services under the proposed amendments to the <i>Waste Avoidance and Resource Recovery Act 2007</i> and the <i>Local Government Act 1995</i>.
	Alignment of waste planning across Government	
		<ul style="list-style-type: none"> Critical mass – In order for recycling to be viable for regional Western Australia, recyclables need to be collected, sorted, baled and stored until a 'critical mass' is achieved. The 'critical mass' is determined by the market and means that quantity of material that will attract a price that is economically viable for the local government. It may mean that the recyclable material remain in storage for a period of time before taken to market. Local government in a region may also consider pooling their recyclable materials to gain a 'critical mass' and split the returns accordingly.
		<ul style="list-style-type: none"> Waste levy funding should be provided to local governments (or waste groups) to establish sorting facilities, bailing machines, appropriate storage (covered hardstand warehouse) and forklift. The facility would provide opportunity for local employment and provide the basis for a viable recycling industry. The landfill levy has increased significantly in Western Australia over the last several years. While it is understood that the rate is lower than other states and that the rationale behind the legislative framework is to change inefficient practices and improve

		<p>waste diversion rates in the waste management industry, the costs however to implement the changes will require significant direct and indirect capital investment from the local authorities and private enterprise.</p> <ul style="list-style-type: none"> • It is believed that all funds generated from the landfill levy must be used in the waste management sector to encourage and assist local authorities and industry to implement the changes instead of using the funds for general revenue purposes.
3.2	Infrastructure Planning	
	Infrastructure capacity	
		<ul style="list-style-type: none"> • In relation to the waste infrastructure plan, the State Government will need to create an environment under planning policies and legislation to ensure land use is permitted for waste management purposes and also conforming for that purpose. In addition, the State Government and DER should provide a vehicle for change by introducing waste management initiatives or programs that would create real changes and improve diversion from landfill.
		<ul style="list-style-type: none"> • Critical mass – Need to provide long term facilities to handle the collection, sorting, bailing and storage of recyclables for a period of time.
		<ul style="list-style-type: none"> • Establish key proven automated recycling plants for various waste streams and appropriate recovery/transport systems to collect the required products. The recovery/transport systems need to be at very low cost or free to consumers to ensure that wastes are not illegally dumped in the environment (to avoid payment of a fee). Fully automated proven technology is critical to ensure consistent end product. Markets will only use the product if it is of a consistent quality and in sufficient quantity over time.
	Governance	
		<ul style="list-style-type: none"> • The Waste Authority will need to be mindful of not creating monopolistic practices as such practices distort the market and prevent initiatives and competition. This applies not only to players in the waste/recycling industry but also to those outside the industry who will move to undercut the recycling industry in order to protect their market. Protection of a portion of the recyclable market is warranted but must be balanced so that the particular market does not develop into a monopoly for the players in the recycling industry.
	Statutory infrastructure planning	
		<ul style="list-style-type: none"> • Government owned – private operated – Key proven recycling technology (automated recycling plants for tyre, electronic waste, refrigerators, mattresses, etc) are currently available. The up-front/establishment costs are high hence private sector are reluctant to provide upfront capital. The government should consider building the facilities and contract out the operation of the plant to private sector. The facility will provide a stable basis for small businesses to establish and develop recycling options, and provides security of investment to the state of WA. The various recycling plants must be proven technology and have operational plants to demonstrate their capabilities.