



Western Australia Branch

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Mr Marcus Geisler
Chair, Waste Authority
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20 February 2017

Dear Mr Geisler

Waste Strategy – 2014/15 Performance Assessment

The Waste Management Association of Australia (WMAA), appreciates the opportunity to comment on the Waste Strategy – 2014/15 Performance Assessment. In responding to this, the Association clearly sees the benefits of having a State Waste Strategy with targets, however it has significant concerns about the current status of implementation and commitment to this Strategy.

Key Themes

In discussing the Performance Assessment, the WA Branch of WMAA noted:

- Progress has been made, however the targets in the Waste Strategy have not been achieved
- During the time the Strategy has been in place, programs have been announced, but then not implemented in a timely way
- There has been limited, and in some cases no, implementation of the range of strategies (knowledge, infrastructure, incentive) identified in the Waste Strategy under each of the Strategic Objectives
- The impact of the increase to the Waste Avoidance and Resource Recovery Levy has been mixed, while driving diversion of waste from landfill, market development and enforcement have not kept pace with the Levy increase.

WMAA considers these issues may be symptomatic of limited Government commitment to the implementation of the Waste Strategy and of issues regarding the roles and responsibilities assigned to the Waste Authority and Department of Environment Regulation – as identified in the Auditor General's Report.

Example: Materials from Construction & Demolition (C&D)

The Waste Avoidance and Resource Recovery Levy was increased significantly for inert materials, in 2014/15. The Levy increase has driven diversion from landfill. However, other mechanisms to support the recycling of this material have not yet been put in place or have been put in place somewhat after the fact. These include:

- Funding Program: To encourage the use of recycled C&D materials, funding was announced in September 2015, then the Recycled Construction Products Program funding officially launched in March 2016. This Program is yet to be implemented and funding accessed by industry.

WMAA is the peak body for the waste and resource recovery industry

- Compliance: Compliance activities have focused on licenced premises and while ensuring that these premises are complying with their licences is important, these facilities at least are clearly receiving material and processing it. The Levy increase provides a strong financial incentive to divert material from landfill and consequently an incentive to dispose of material illegally – or without paying the Levy. Therefore compliance activities need to focus on premises which are receiving materials without a licence and premises, outside the metropolitan area, which are receiving material without paying the Levy.

Regarding the questions posed in the initial questionnaire the WMAA WA Branch comments include:

- The Waste Avoidance and Resource Recovery Levy has led to increased diversion of waste from landfill in the metropolitan area, but has also led to increased illegal dumping and stockpiles. A significant amounts of C&D material is no longer going to landfill, but it is not clear where that material is going. The commercial and industrial (C&I) sector also reports a significant reduction in waste to landfill, but again where is the material going?
- Industry needs longer term certainty on future increases to the Waste Avoidance and Resource Recovery Levy – this allows industry to plan accordingly, these funds should also be clearly reinvested back into industry.
- Landfill diversion is not the only measure that should be included as a target, other options higher up the Waste Hierarchy should be included. Other measures should include increasing local processing capacity and markets.
- When reviewing the Waste Strategy it is important to establish what was not implemented or did not work, and why that was the case - for all the elements of the Waste Strategy.
- Industry seeks to understand what is the Government's commitment to the implementation of the Waste Strategy? Industry considers that the Waste Strategy should be a whole-of-Government commitment, which includes, for example, a commitment by Main Roads to use recycled C&D materials in their operations.

WMAA supports a review of the Waste Strategy and would also like to request that for the consultation a reasonable time period be put in place, as WMAA has many members across the various segments of waste industry and time is needed to consult and formulate a representative response.

The Association looks forward to working with the Waste Authority on the review of the Waste Strategy. Please do not hesitate to contact the undersigned if you wish to discuss further.

Yours sincerely



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