

1 September 2017

Hon Stephen Dawson MLC  
Minister for Water and Environmental Regulation  
12th Floor, Dumas House  
2 Havelock Street  
WEST PERTH WA 6005

## **RE - WASTE MANAGEMENT AND RECYCLING IN WESTERN AUSTRALIA**

Dear Minister,

The Waste and Recycling Industry Association of Western Australia (WRIWA) is a recently formed association representing companies which have directly investment in the waste, recycling or composting sectors in WA.

WRIWA members support the *West Australian Waste Strategy - Creating the Right Environment* and the legislation underpinning this strategy. All association members commit to high professional and environmental standards.

We acknowledge the recent *Four Corners* report on the ABC exploring sub-standard recycling and landfill practices on the east coast. WRIWA believes similar practices are occurring in Western Australia and changes to regulation and enforcement are required to achieve better outcomes.

WRIWA acknowledges the recent release of the DWER discussion paper "*Waste levy and waste management: Proposed approaches for legislative reform*". WRIWA intends holding a workshop involving all of its members to prepare a submission. Ahead of this formal submission, WRIWA believes it appropriate to provide a summary of its current direction in this area.

### **Improved outcomes in WA**

One specific area that needs immediate improvement is the design and compliance requirements for WA's landfill levy. The levy is designed to apply to waste generated in the Perth metropolitan area and disposed of in landfills - located either in metropolitan or regional areas.

WRIWA believes that some waste transporters and/or landfill operators are avoiding paying the levy due to poor design of the system and a lack of enforcement activity by the Department of Environment Regulation (DER).

When the levy is bypassed the government loses revenue, the environment suffers, community confidence is undermined as is the reputation of the industry. If some industry operators are avoiding payment of the levy, the competitive playing field is not level and this undermines recycling and the intent of the levy.

WRIWA believes that changes to the design of the landfill levy are required, but also acknowledges that the impact of change needs to be examined to ensure that no unintended consequences are created. We have compiled a range of landfill levy reforms that the government could consider.

These reforms are summarised on the following page.

POSSIBLE REFORM	WHY?
Extend the landfill levy capture area beyond the current metropolitan area boundaries.	It appears to WRIWA that some metropolitan waste is being 'passed off' as having regional origins because the cost of transport to a regional landfill is cheaper than the levy.  This was a major focus of the <i>Four Corners</i> program where landfill was being transported from NSW to QLD due to zero levy being applied in QLD.
Better regulate commercial/council landfills by requiring aerial surveys be undertaken quarterly and submitted to DER.	Better measurement of how much waste has been landfilled each quarter will allow DER assessment of whether the proportion of landfilled waste that has had the levy collected is reasonable.
DER to police landfill levy compliance in "real time". That is; spot checks of whether Perth sourced waste loads transported to regional landfills have made correct declarations at the landfill gate.	The current system seems to rely on landfill operators making judgement calls on waste origin. This provides incentives for sub optimal outcomes throughout the total value chain.
Require waste collectors/consolidators/transporters to provide to the landfill operator a certifiable declaration of the waste origin. These would need to be included with the landfill levy return made by the landfill operator to the DER.	This will improve the checking and audit of landfill levy collections and incentivise better compliance. Revenue to the government would increase.
Government to better incentivise the use of recycled materials in public works programs. There is reluctance among some government agencies to move away from the long-standing use of virgin materials.	Creating markets for recycled materials is essential to incentivise maximum rates of resource recovery.  Government could have a "whole of government" (such as Main Roads, Water Corporation) requirement for a minimum percentage of recycled material in its tenders, or have tender assessments reward inclusion of recycled materials.

WRIWA acknowledges the need for a thorough and rigorous review of how best to improve the landfill levy system. Positive improvements to the system will improve recycling, government revenue, the environment and incentivise a more competitive industry.

WRIWA offers its resources such as its Executive Committee and/or Executive Officer to engage with you and your staff and DER on these matters. A quick and positive outcome for all participants is possible.

I have asked our Executive Officer, John Lillywhite to contact your office to establish an appointment where I can meet with you to work through how to improve recycling and environmental outcomes in Western Australia. I am sure you will agree that an Industry Association comprising the largest waste and recycling operators in Western Australia does have an important role to play. We are keen to undertake our role.



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Separately, WRIWA will contact your office to check your availability to meet with the Members of WRIWA at an 'after work' function where you are invited to outline the Government's environmental waste and recycling plans for WA, and hopefully engage with our Members to receive feedback on a range of industry matters.

I look forward to a very successful and positive relationship between the government and the Waste and Recycling Industry Association of Western Australia. If you have any need to contact WRIWA my contact details are;

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Cockburn Central WA 6164

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Yours sincerely,

Mike Harper  
President, WRIWA