



Mr Marcus Geisler

Waste Authority Chairman
c/- Department of Water and Environmental Regulation
Locked Bag 33, Cloisters Square
PERTH WA 6850

Dear Mr Geisler

**SUBMISSION TO THE WA WASTE AVOIDANCE AND RESOURCE RECOVERY STRATEGY
CONSULTATION**

The Waste and Recycling Industry Association of Western Australia (WRIWA) represents private sector companies with direct investment in the waste, recycling and composting sectors in WA. WRIWA members collect, process, recycle and dispose of around two thirds of the total waste produced in this State. WRIWA members are committed to high professional and environmental standards.

WRIWA has two broad objectives:

- to achieve best practice environmental outcomes from collection, processing, recycling and disposal of waste; and
- to ensure markets are fair and transparent, ensuring competition occurs on a “level playing field” that drives value for customers and a fair return on investment for members.

WRIWA members include the large nationally based waste collection and recycling companies, landfill owners and operators along with WA-based companies including waste, recycling, demolition and associated services.

WRIWA is the WA affiliate of the National Waste and Recycling Industry Council (NWRIC), which represents the interests of industry members across Australia. For more information on the NWRIC please see: <http://www.nwric.com.au>

WRIWA has been active in approaches to government and has made several submissions which can be accessed via our website: <https://www.wriwa.com>

In preparing this submission, WRIWA has consulted extensively with its own member base in WA, with the national body (NWRIC) and with the Demolition Industry Association of WA.

WRIWA strongly supports the sentiments expressed by the Hon Stephen Dawson MLC, Minister for the Environment in the forward to the consultation paper :

The reality is that Western Australia’s waste performance needs to be strengthened, and we intend to work with the Waste Authority, industry, the community and local governments to turn this track record around.

WRIWA is committed to working with State Government, the Waste Authority, Local Government and our colleagues in industry to achieve much needed reform of the State’s waste strategy and its implementation.

We can bring to the process skilled professionals with extensive State and national experience in key subject areas raised in the Consultation Paper, including the Container Deposit Scheme, the Landfill Levy and specifications for C&D aggregates.



WRIWA's response focuses on the following key areas.

- **Planning:** Waste processing and recycling facilities require substantial capital investment by private industry. To continue to innovate and introduce technologies that will increase resource recovery, industry need the surety that planning laws will not allow residential and other commercial development to encroach on sites suitable for waste processing.
- **Levy Avoidance:** Our focus is improving regulatory systems to detect and stop avoidance. Avoidance is damaging honest operators who are complying with the regulations. The current level of avoidance is well known within the waste sector and there is an increasing awareness within the NGO environmental sector and the general community. Failure to bring it to an end risks undermining public confidence in our State's waste avoidance and resource recovery strategies.
- **Levy Anomalies:** WA has resource recovery companies which operate in world markets. Consideration needs to be given to Levy exemptions for companies which can demonstrate that the Levy is damaging their ability to compete internationally.
- **Acceptance of C&D aggregates:** There is a very low level of acceptance and take up of C&D aggregates by both the Local Government and State Government agencies. C&D waste is successfully being diverted from landfill and is being recycled into aggregates suitable for road base (etc). However market uptake is lagging far behind output, and placing the sustainability of the waste strategy at risk.
- **Container Deposit Scheme:** WRIWA supports this proposed scheme. There needs to be strong liaison between regulators and industry particularly industry members operating Material Recovery Facilities as the details of the scheme are planned and rolled out.
- **China National Sword:** The Chinese Government has altered its criteria for acceptable contaminant levels in imported post-consumer products. This has had an immediate effect on all sectors of the recycling industry. It is estimated that costs of processing recyclables will rise by up to \$100 per tonne here in Western Australia. Industry is seeking urgent assistance from the State Government to address this issue.

We look forward to working with you and other key stakeholders to progress these issues. WRIWA's Management Committee would be happy to meet with you at any time.

A copy of this submission has been emailed to the address indicated in the consultation paper.

Please contact Michael Bobrowicz, WRIWA Executive Officer on 0418 190 861 or at mikebobrowicz@bigpond.com if you have any queries about the attached submission.

Yours sincerely

Michael Harper
President
WRIWA

27 February 2018