



Waste Levy Review  
Department of Water and Environmental Regulation

[consult.dwer.wa.gov.au/waste-policy/review-of-the-waste-levy/](http://consult.dwer.wa.gov.au/waste-policy/review-of-the-waste-levy/)

Dear Sir/Madam

I am pleased to submit the Waste and Recycling Industry Association of Western Australia (WRIWA) response to the WA Government's *Review of the Waste Levy*.

WRIWA represents the commercial waste and recycling sector in WA; our current Board members are listed at [www.wriwa.com/wriwa-board/](http://www.wriwa.com/wriwa-board/). Our mandate is:

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

We thank the Department for this opportunity to respond to the review. As you will see from our attached submission, the issues addressed are central to our members.

We are submitting two versions of our submission:

1. A **CONFIDENTIAL** version which contains information which could lead to the identification of whistle blowers, or disclose confidential investigations being carried out by DWER. This submission is not for publication.
2. A **FOR PUBLICATION** version suitable with all confidential information removed.

The WRIWA submission certainly reflects our views based on our understanding of what is proposed; however it is less certain to us that the paper will achieve the necessary and desired real world outcomes that are intended.

WRIWA has considered an equitable approach for all of industry in responding to this review. We want to be sure that the measures proposed will end systemic levy avoidance while making sure that legitimate players are not unintentionally disadvantaged.

You are no doubt aware that WRIWA has been meeting on a quarterly basis with Director General Mike Rowe and other senior DWER officers (Stuart Cowie and Sarah McEvoy) since early 2019 to discuss the underlying systemic problems that the current Landfill Levy Regulations have presented. Thanks to departmental actions arising from those meetings, we have since seen one of the sites that we believe was actively engaged in levy avoidance cease that activity.

Industry is looking for a systemic solution to a systemic problem and WRIWA has supplied to the Department evidence suggesting that avoidance exceeds revenue collected (in 2018-19 collected \$83m; avoided \$93.3m).

Our submission is the result of intensive consultation among WRIWA members. We see value in a further consultative process following this current one, to clarify the implications of the preferred options. Based on recommendations made in the various submissions we would suggest that this then form the basis of further consideration through forums for concerned parties.

Thank you for considering WRIWA's submission to the *Review of the Waste Levy* consultation. If you have any queries, please contact Michael Bobrowicz, Executive Officer WRIWA, by phone on 0418 190 861; or by email at [michael@wriwa.com](mailto:michael@wriwa.com)

Warm regards

Michael Harper  
President  
WRIWA

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