



WRIWA

Western Australia Election Policy Priorities
for the Waste and Recycling Sector

2025

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Towards achieving a Circular Economy in WA

We acknowledge the Traditional Owners, the Whadjuk people of the Noongar Nation of the land upon which we live and work and pay our respects to their Elders past and present. We recognise the practice of intergenerational care for Country and its relevance to our work bringing it to life on Whadjuk Noongar Boodja

The Waste and Recycling Industry Association of WA (WRIWA) who we are and what our members do

The Waste and Recycling Industry Association of WA (WRIWA) is an industry-only body representing the waste and recycling industry. If it's waste or recycling, then our members cover it:

- Our fleets of **kerbside collection** vehicles collect and recover recycling, food organics and garden organics, and residual waste at kerbside. In Perth the collection industry carries out 300,000 bin lifts per day and as the FOGO rollout proceeds this will increase to approximately 360,000 per day.
- We produce the highest quality recovered kerbside material in Australia. **The Cleanaway Guildford Material Recovery Facility (MRF)** with a throughput of 200,000 tonnes per year, is designed to recover plastics and fibre to 99.5% purity.
- We operate the states end-to-end Food Organics Garden Organics (FOGO) facility. The Gingin **GoOrganics** plant produces high quality certified soil improvers. With the aid of a sophisticated bagging plant, Go Organics is putting product back into the economy on supermarket shelves.
- We have one of Australia's highest achieving Container Deposit Scheme operations in Australia. After only three years recovering 66.5% of eligible containers.

- **Tyrecycle** at East Rockingham which processes 40,000 tonnes of tyres that previously went to landfill and is producing 7,000 tonnes per annum of crumbed rubber for Main Roads WA. The facility also processes Off Road Tyres having entered into an agreement with Alcoa Australia to process 400 tonnes of mining tyres from the Perth area. **Tyrecycle** has also built a mining tyre dedicated facility in Port Hedland with a capacity to provide a tyre recycling solution for 30,000 tonnes of mining tyres traditionally disposed through burial.

CTS Tyre Recycling, has invested more than \$40 million in a state-of-the-art tyre recycling and remanufacturing facility at **Neerabup**, north of Perth. The **CTS Tyre Recycling** Facility has the capability to recycle the largest Off the Road surface mining tyres, which are downsized into smaller portions to be fed into the recycling line. CTS can also remanufacture high value products such as acoustic underlay, gym matting, load restraint matting, and equine and farm matting. With an opening capacity of 30,000 tonnes in the first year and capacity to expand to 60,000 tonnes pa.

- We represent the leading metals processors in WA, including **Sims Metal** which is one of the leading electronics and metal recycling companies in the world. The company recycles approximately 10 million tonnes of metal across its global operations. Sims Metal's activity contributes significantly to diverting millions of tonnes of material from landfill each year to "create a world without waste to preserve our planet".
- Our members are certified to produce **crushed recycled concrete** (CRC) aggregates to Main Roads WA specification and are diverting 400,000 tonnes per annum of Construction and Demolition waste away from landfill.
- We recover **E-waste** as part of the state strategy to stop E-waste going to landfill.
- **Smart Waste Solutions** provide onsite customised solutions by supplying an extensive range of equipment to avoid landfill by recycling C&I products, achieving a Circular Economy in WA where possible, and providing sophisticated on-site compaction solutions to reduce transport and landfill volumes minimising CO2 emissions.
- Our members make and distribute mobile garbage bins with high recycled plastic content, and we represent the world's largest supplier and installer of reverse vending machines.
- **Drainflow Services** / Revive Resources collect and recycle putrescible municipal waste deemed unfit for landfill, that is contaminated with hydrocarbons and heavy metals from road sweepings and storm water drains. Up to 95% of this waste is converted to certified clean sand, aggregates, and organic material using the latest European technology the Terex GreenHydro Wash Plant, the first here in WA.

- **Write Solutions Australia**, which covers the collection and servicing of **commercial** FOGO with a custom fleet of 3 vehicles, collects from the hospitality industry all food scraps (including meat, dairy, coffee grounds, and confectionery), paper products such as napkins, paper bags, paper straws and other compostable packaging along with garden waste and compost it into nutrient rich soil improvers.
- We are proud to have Australia's first incinerator bottom ash, metal recovery and aggregate recovery plant **Blue Phoenix** an essential part of our growing Energy Recovery industry. This is a truly sustainable circular economic process, delivering a suitable aggregate back into civil infrastructure industry, all from residual municipal solid waste.
- **Tidy Up**, is WA's first company to recover embedded batteries from consumer electronics and has been certified and registered by the Battery Stewardship Council as an Incidental Collector. Tidy Up is focussed on reuse of materials to support the circular economy and the idea that it takes less energy to simply get things back out into the community versus sending them to landfill.
- **C.D Dodd** has invested in excess of \$7Mt to support the Woodside decommissioning efforts. This includes a purpose built 40,000m² yard in Onslow within the Pilbara Regional Waste Management Facility to take delivery of the recovered assets from the Oil and gas recovered products project. As part of this C.D Dodds are undertaking the processing of flexible flowlines and umbilicals at the Karratha facility which will do full material separation to increase recyclability and reduce the amount of product going to landfill.
- Finally, we also manage, process and treat a majority of Western Australia's high-risk waste streams including medical waste, controlled waste and radiological waste streams, and operate Australia's only geological depository, the **Tellus Holdings** Facility at Sandy Ridge.

Our Members



Achievements, Challenges and Opportunities in WA

If WA is to move forward, it is important to understand our successes. While there are common issues between eastern and western sides of Australia, there are also many differences worth noting.

Energy Recovery

The East Rockingham and Kwinana Energy Recovery power plants in outer Perth are about to come online, with a combined capacity of 760,000 tonnes. The two plants will play a significant role in achieving the Waste Avoidance and Resource Recovery Strategy 2030. In May 2024, the Western Australian Waste Authority issued its Waste Avoidance and Resource Strategy 2030 Consultation Draft. This draft document contains the clearest statement industry has yet seen on Energy Recovery (ER) including the headline: Recover energy only from residual waste”, designed to ensure ER feedstock includes no recyclable material, which should be recovered from higher in the value chain. WA is now at least five to six years ahead of every other State in terms of energy recovery, due to these new plants and is recognised as the leader in energy recovery in Australia.

Recycling

WA is currently the only State in Australia with unified state-wide guidelines for what can and can't go in both a FOGO and a yellow topped recycling bin, removing the massive confusion that results when each LGA has their own specification.

While WA still has a long way to go, it's clear that the Waste and Recycling Industry in WA is more than pulling its weight, as measured against any objective standard, and that the Waste Avoidance and Resource Recovery Strategy 2030 has provided strong policy.

However, the Government needs to develop a WA specific recycling model.

WA is the largest State by area, and the logistics of collecting recyclables are formidable – yet this is never considered by national policy. WA is geographically isolated from recycling hubs located in Eastern Australia, transport distances are too large, and our recyclers are unable to access synergies to support secondary recycling that are available on the east coast.

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It is questionable if WA has sufficient tonnages of some product to support an economically viable stand-alone secondary recycling industry. The value of recyclables has sharply declined in WA since the inception of the export bans, and recyclers are transporting material to NSW and SA to secondary processing facilities to gain export licences.

For example, Cleanaway was provided by the State Government with a \$12m grant to invest in plastic/PET recycling in WA where previously, feedstock concerns meant this was not viable.

Similarly, WA has a unique commercial advantage, and that is our proximity to Asia, one of the largest markets in the world. Unfortunately, the national Recycling and Waste Reduction Act and export bans have negated that advantage.

WA needs a customised recycling model that focuses on our unique geography, and above all we need a model that is flexible and responsive to our differing market conditions. Exports will continue to be a key pillar for WA recyclers, provided operators can meet the contamination requirements and the cost/benefit ratio of doing so remains.

Challenges and Opportunities

WRIWA calls on the incoming Government to set strong policy guidelines that will assist industry to achieve the objectives of the Waste Avoidance and Resource Recovery Strategy 2030 and general issues in our industry.

1. Lithium-Ion Battery Fires in Waste and Recycling Collection vehicles and at Material Recovery Facilities, Metal shredding plants, E-Waste processing and throughout the whole waste and recycling eco system.

Thirty fires a day has become the new normal in our industry across Australia, and no corner of the waste industry is immune to it. Small, embedded batteries in children's toys, vapes and thousands of other devices are now endemic through the economy, creating a serious and constant hazard to our workforce and to the public. We need concerted action by all levels of government to address this issue. This is a situation which industry cannot fix on our own, and where we will not be able to guarantee our employees a safe workplace.

The situation is unsustainable. WRIWA calls for:

- A mandatory battery collection system which must include embedded batteries modelled on the highly successful Container Deposit schemes. The scheme must involve a substantial rebate for returned batteries.
- A fully funded scheme which focusses primarily on eliminating the danger of Lithium-Ion batteries entering the waste or recycling system.

WRIWA acknowledges the decisive action by the Cook government to fund a public education program on the issue of batteries and their safe disposal.

2. Landfill Levy: Avoidance, Area, Rate and Hypothecation

The landfill levy underpins waste strategy in this State. WRIWA calls for a review of:

- Levy avoidance, and how it can be stopped
- The current restriction of the levy to the metropolitan area
- The rate of the levy as a driver of recycling
- The hypothecation of the levy to support recycling in this state.

3. Recovered Materials Framework

WRIWA is a strong supporter of the Recovered Materials (RM) Framework.

The Department of Water and Environmental Regulation (DWER) is advancing key legislative reforms aimed at enhancing waste management in Western Australia and fulfilling the State Government's commitments outlined in the Waste Avoidance and Resource Recovery Strategy 2030.

A key component of this reform is the introduction of the RM regulatory framework, which addresses a critical gap in the Environmental Protection Act 1986 (EP Act) - not having a mechanism to reclassify, approve or manage reuse of waste.

The absence of an RM Framework has been a real impediment to re-using waste-derived materials, resulting in missed economic opportunities for the State and slowing progress toward a circular economy. This gap can also perpetuate unsustainable practices, such as the preference for raw materials, while valuable waste is either sent to landfill, stockpiled indefinitely, or disposed of illegally.

To ensure that the development of the RM Framework reflects industry expertise and real-world insights, a Stakeholder Reference Group has been established. WRIWA fully supports the State Government's approach to this issue and looks forward to working closely with DWER as the reform unfolds.

The RM Framework will encourage recycling, resource recovery, and the circular economy, reducing reliance on landfills and minimising environmental impact. By prioritising the reuse and transformation of waste materials into valuable resources, the RM Framework will foster sustainable practices, stimulate innovation in waste processing technologies, expand end-markets, provide assurance to end-users, and create new economic opportunities. Ultimately, it will contribute to a more efficient economy that conserves resources and supports a cleaner, healthier environment.

4. Commercial and Industrial recycling including commercial food waste

Commercial and Industrial recycling including commercial food waste There are currently no programs or funding to support the recycling of C&I waste, in places such as government offices, schools, prisons, factories, hospitals, universities, shops, and notably – cafes, eateries and other entertainment venues. This represents a significant gap in the drive towards a circular economy DWER has commenced a survey to better comprehend the issues.

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WRIWA calls for:

- Container Deposit Scheme extension
 - Funding and clear policy to support C&I recycling consistent with the State's legislated container recovery goal, including the mandatory separation of eligible 10c containers wherever they are being used and disposed of.
- Commercial Food Waste recycling
 - Approximately 50% of the waste generated by the hospitality industry is food waste which is being lost to landfill.
 - The NSW government is mandating from July 2025 that the first step of a graduated introduction of Mandated Food Waste Recycling from commercial premises. From July, large supermarkets, hospitality venues and institutions will be required to recycle food waste. WRIWA supports the adoption of a similar mandate in WA.

5. Government Purchasing of Recycled material and review of the Common User Arrangement (CUA)

The CUA which is the primary mechanism that determines how WA State Government instrumentalities purchase waste and recycling services is currently under review for the first time since 2016. The current CUA precedes the Waste Avoidance and Resource Recovery Strategy 2030 and does not reflect state recycling policy.

The review of the CUA offers a unique generational opportunity to support the states Circular Economy objectives. WRIWA calls for the alignment of the CUA with the Waste Avoidance and Resource Recovery Strategy 2030 and the goal of a circular economy in WA.

6. Ban on the burial of tyres.

Currently WA allows the burial of tyres on mine sites and in landfill. This undermines the significant investment, by not just private companies but also by both the Federal and State Governments, through the Recycling Modernisation Fund (RMF). There is significant capacity among the tyre recycling companies within WA that could recycle all of these waste tyres into value-added products. This would not only help WA meet its Waste Strategy goals but provide numerous ongoing jobs that a landfill cannot.

At this time, there is no legal requirement for the mining companies to recycle these massive tyres, each of which can weigh up to five tonnes. WRIWA has no expectation that there is any

prospect of recovering the tyres already buried. However, we believe that, with encouragement from government, the mining industry can be encouraged to return future EOLTs to strategically located EOLT recycling centres on the same road trains (purpose-designed to carry OTR tyres) that carry them to their sites. In addition to reducing landfill disposal, these recycling initiatives would reduce the need for further virgin product. This is a key element if we are to progress to a sustainable circular economy.

WRIWA calls for

- Immediate ban on burial of tyres and shredded tyres that are passenger/4wd and truck tyres.
- Phased in ban of burial of Off the Road (OTR) tyres from the mining sector over the next 2-3 years.
- Legislated procurement rates of crumbed rubber into roads.

7. Household Food Organics Garden Organics (FOGO)

FOGO is one of the most significant opportunities we have to reduce waste to landfill. Some LGA's have reported reduction of waste in the Red Topped Bin of >60% following the introduction of FOGO. The major problem in this area is one of contamination.

WRIWA calls for the full implementation of the recommendations of the MRA Consulting report: Better Practice FOGO Contracting:

- Planning and contract procurement should start at least 12 – 18 months ahead of the planned implementation including establishing an evidence base
- A fully funded and implemented enforcement three-strike program for education and enforcement on at least an annual basis as a mandatory Best Practice condition
- At least annually a representative contamination audit undertaken through an agreed process
- Contamination: the national average is 2.2%, however best practice has achieved rates below 1% Best practice should be < 2%
- Contract provision should provide a sliding scale of costs for increased contamination levels
- Minimum expected recovery rates greater should exceed 94%. Contamination eliminated at source not through a screening and dumping process
- The annual expenditure on education generally adds \$8-\$10 per household for an average council. LGA's can carry out this function in house or outsource this function. Best Practice would guarantee an education expenditure > \$8 per household per annum CPI adjusted
- A guaranteed reuse agreement clause included in contracts to confirm that FOGO derived materials are used according to the resource recovery hierarchy with a buy back agreement

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The contracted parties agree to a quality specification of the final FOGO derived product
Provision of adequate numbers of certified compostable caddy liners as part of the contract

8. Solar panel, home solar batteries and electric vehicle components recycling

This is a significant issue of growing concern and WRIWA considers that we need a robust conversation including Government.

- Can this be solved locally?
- Can we extend and accelerate the use of extended producer responsibility (EPR) for these products?

WRIWA calls for an urgent and robust discussion to develop state policy to address this urgent and growing issue.

9. Oil and Gas Decommissioning project

WRIWA supports the intervention by a future WA government to grow a new industry in WA.

The Federal Government has committed to kickstart a \$60 billion industry in Western Australia and bring the decommissioning of oil and gas rigs onshore via funding injection and new deals with the State and the UK. WRIWA understands a separate agreement with the WA government to streamline regulation is being considered.

Decommissioning involves removing rigs, pipes, undersea equipment and permanently capping wells. Establishing a domestic decommissioning industry, worth around \$60 billion, would support the local resources sector and create thousands of new, highly skilled jobs.

To illustrate the scale of the undertaking, Woodside has removed about 25,000 tonnes of infrastructure across four fields offshore from WA, including 200km of pipe.

WRIWA is seeking assurances that a future WA government will support the local onshore processing in WA.

10. License amendment and application approval timelines

Industry faces ever increasing costs and time to put together license amendments and other regulatory applications. We note significant scrutiny and with very long lead times for outcomes.

What is the government looking to do in this space?

WRIWA calls for urgent discussions with a view to meaningful improvements to reduce the drag on industry.

What's in this for the Government?

In this paper we have highlighted the most significant issues currently facing the waste and recycling industry in Western Australia.

Previous national reports have demonstrated that Industry provides on average 80% of the capital in the waste and recycling sector. This percentage is increasing as the government percentage is decreasing, since much of the local government funding was legacy funding from local landfills which are now being closed.

We are also now increasingly seeing the introduction of capital-intensive advanced technology into the waste and recycling sector. In the last three years we have seen:

- Kwinana Energy Recovery Plant at \$668m
- East Rockingham Waste to Energy plant at \$511m
- The Cleanaway Guildford Material Recovery Facility at \$26m
- The Tyrecycle East Rockingham Plant at \$15m
- The Tyrecycle Port Hedland Facility at \$10m
- Drainflow's Terex Green Hydro Wash Plant at \$10m
- WARRRL investment in operating the Containers for Change recycling supply chain. \$399.4m
- Blue Phoenix Incinerator Bottom Ash plant \$239m
- Tellus Holdings – Sandy Ridge Geological Depository \$100m

WRIWA acknowledges the contributions made by the WA State Government, both through the Waste Sorted Grants program and the joint Recycling Modernization Fund grants with the Australian Government. However, we would seek to further increase these programs to allow more businesses to build bigger and more efficient treatment and processing facilities. This will in turn facilitate greater economic growth across the State.

There are several unique challenges that must always be taken into account when we consider how we will achieve better recycling outcomes in WA:

- WA is the largest State by area, and the logistics and cost of collecting recyclables are far greater in WA than in any other State or Territory.
- WA is also the most geographically isolated state, and it is very costly to access the recycling hubs and hazardous waste treatment plants located in Eastern Australia.
- For some recyclables it is questionable if WA has sufficient tonnages of some product to support an economically viable stand-alone secondary recycling industry. Or at the very least the unit cost to process these materials is higher.
- The value of recyclables has sharply declined in WA since the inception of the export bans, and recyclers are transporting material to NSW and SA to secondary processing facilities to gain export licences.

To conclude, for the waste and recycling industry to expand and support the WA's waste strategy two key elements must be in place:

- Stable forward-looking policy that gives investment certainty; and
- Funding to support innovation and expansion.

WRIWA STANDS READY TO ENGAGE WITH THE NEW STATE GOVERNMENT AND HELP STRENGTHEN OUR ECONOMY.

Should you have any questions or require further information please contact in the first instance:

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WRIWA would like to thank our sponsors





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