



Ms Michelle Andrews  
Director General  
Department of Water and Environmental Regulation  
Locked Bag 10  
Joondalup DC WA 6919

Email: [infrastructureplanning@dwer.wa.gov.au](mailto:infrastructureplanning@dwer.wa.gov.au)

26 June 2023

Dear Ms Andrews

**Re: Draft WA State Waste Infrastructure Plan**

Thank you for the opportunity to provide feedback on the department's Draft WA State Waste Infrastructure Plan. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 500 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and NGOs.

To achieve the goals of the Waste Avoidance and Resource Recovery Strategy 2030 (Waste Strategy), the Draft WA State Waste Infrastructure Plan must go beyond treating waste infrastructure planning as a series of isolated projects that primarily addresses end-of-pipe challenges. The best laid plans for end of life are those made at the creation of a product. WA must recognise resource life cycles (including how these can be prolonged), material streams (albeit this data may reside in other non-public documents), and support proactive and sustainable management and investment in these systems through design, use, reuse, recycling and eventual end of life management to ensure maximum value has been obtained.

There are a number of material streams, that do not appear to have been well considered in this strategy (possibly in the antecedent documents but it is not evident), including textiles, e-waste, timber, Material Recovery Facilities (MRFs) and construction glass, and even assumptions made in relation to plastic flows (referred to at page 39) which makes it challenging to have confidence in this document guiding investing in WA WARR infrastructure, given the lack of clarity of volumes and markets. Some of these materials may have been aggregated in the specialist recovery facilities but it is unclear and given they are so diverse in solution this information is problematic for investors to rely upon (let alone for planners and regulators to do their jobs!). The document itself notes that there was a challenge with data in some instances and it is of concern that the government has had many years to address this issue.

In WMRR's view, this strategy should be able to stand on its own and be capable of driving investment in WARR infrastructure within WA. To achieve this the strategy should have clear data on material streams, as opposed to assumptions of facilities, for example with MRFs- what are these and what do

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037

(02) 8746 5000  
INFO@WMRR.ASN.AU

**WMRR.ASN.AU**



they include (sorting or also re-processing), with clarity of market opportunities in WA. Further there should also be a clear carbon strategy for WARR in WA- which is integral to resource recovery, carbon mitigation and energy impacts. Given the urgent need to address climate change, and the legislated reduction targets it is imperative to incorporate carbon reduction measures and material priorities into the Plan.

These publicly available targets will promote increased and ongoing market demand for non-virgin materials and support the continued growth of the recycling and reuse industry in WA, thus reducing some of the negative externalities associated with offshore processing (carbon) and grow local remanufacturing capabilities (jobs).

The time taken to deliver this critical infrastructure should also be addressed urgently if WA has any real intention of achieving its 2030 targets, as notes in the document it can take between three (3) and seven (7) years to deliver such infrastructure. Further by incorporating circular economy principles and acknowledging the waste management hierarchy early in the stages of waste infrastructure project planning, through designing for disassembly and material recovery, WA can minimize waste generation and facilitate the recovery of valuable resources while reducing reliance on virgin resources and promote the reuse and recycling of materials from the very infrastructure built to manage waste. WA must also urgently address market demand for materials at scale, to drive the use of recycled materials in projects as a priority through similar work that is being done by EcologiQ in Victoria (which WMRR supports) and procurement targets (for all levels of government) for secondary raw (recycled) materials, reuse and modulization for disassemble. These approaches not only conserve natural resources (by avoiding virgin material) but also reduce greenhouse gas emissions and energy consumption linked with primary material extraction and production while supporting local remanufacturers.

WMRR's responses to the consultation questions can be found below. Please do not hesitate to contact the undersigned at [gayle@wmrr.asn.au](mailto:gayle@wmrr.asn.au) if you wish to further discuss WMRR's submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan  
**Chief Executive Officer**  
Waste Management and Resource Recovery Association of Australia

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
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<p><b>Summary</b></p>	<ul style="list-style-type: none"> <li>• Overall, to what extent does the Plan provide your organisation with useful guidance on infrastructure related decision making? Why is that?</li> <li>• How do you see the plan being used by your organisation to inform decision making and investment planning about waste infrastructure?</li> <li>• Do you think the plan will help you identify who to engage with when planning and decision making for future infrastructure? Why/why not?</li> </ul>	<p>The plan needs tonnes and yields by material streams for the three major groups (MSW, C&amp;D and C&amp;I) as well as detailed explanation on the assumptions about the material streams contained within. This assists in determining investment opportunities as well as providing opportunities to understand materials flows for aggregation, given factors such as contract terms in existence.</p> <p>At this stage, given the lack of comprehensive information within the document (as mentioned above) and the lack of clarity as to some material streams, it is quite challenging to use the information strategically for investment, as there is not a holistic picture provided. The document would benefit from clarity of generation by area and material stream to assist in understanding investment opportunities that could exist.</p> <p>It is also unclear how this document works with the planning framework in WA and what the government's intention is in this regard- particularly given the principle of these being <i>essential infrastructure</i>. For example, the plan notes that there are many landfill sites that could, if used and supported strategically by government, be adapted for transfer stations (aggregation points) and resource recovery precincts, if there was approval within a planning framework to intensify use. If this approach was strategically developed by government this could also have the clear advantage of fast-tracking planning for additional facilities, assisting WA meeting its targets given these are appropriately sited locations for WARR infrastructure. However, there is silence on the link between this document and the WA planning framework.</p> <p>Messaging to-date struggles to raise the need to be resource efficient, value material and consider consumption habits, taking</p>
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		<p>responsibility for the waste material we create (whether as an individual, company, facility, etc., and moving beyond collection and disposal costs), including where materials and products end up once discarded. Material management is vitally important – design, avoidance, recycling, remanufacturing, take-up of recycled products, etc. – but just as important (as per the hierarchy) is the consumption and avoidance piece.</p> <p>Further given the lack of update to the waste levy strategy and market access (e.g., the impact of export bans) and demand information (e.g., government procurement), it is difficult to see how this document in isolation can provide investor confidence on its own. For example to date we have not seen any real commitment by government to purchase recycled material at scale, nor were any real market levers set (such as requiring councils to purchase back compost) when FOGO infrastructure was being developed and delivered- the lack of strategy to date means that investment is cautious in WA given the need to either have high gate fees or strong sales to ensure that a resource recovery facility will be viable ongoing in WA.</p>
<p>Principles to guide waste and resource recovery infrastructure</p>	<ul style="list-style-type: none"> <li>• How would you rate the importance of each of these Principles?</li> <li>• In what ways do you think these Principles will assist stakeholders in their decision making about waste and resource recovery infrastructure?</li> <li>• How do you see your organisation applying these Principles to guide Infrastructure related decision making?</li> </ul>	<p>The five (5) principles are a solid starting point, however they have greater emphasis on managing waste at end-of-pipe (making accessible, safe, best practice), as opposed to recognising that should be delivered here is also a resource recovery strategy- effectively the Plan is quite a linear strategy.</p> <p>To create a strategy that values resources (circular) or even ‘closes the loop’, there must also be principles that drive actual resource recovery- which in essence means making and selling products that complete with virgin products. There is no principle here that</p>

	<ul style="list-style-type: none"> <li>• What do you think will be the barriers to using these Principles for decisions relating to waste and resource recovery infrastructure?</li> <li>• If you feel that any of these Principles could be refined or improved, please provide your suggestions.</li> </ul>	<p>addresses that the materials we consume are valuable and where possible we should minimise consumption (avoidance) and maximise resource efficiency (maximise life cycle at highest and best use for as long as possible), to support circular thinking and acting. The lack of clear lifecycle thinking (coupled with lack of regulatory framework and levy strategy), and market strategy could be a clear barrier for investment in WA when one considers states such as SA and Victoria that have these elements in place.</p> <p>WMRR encourages the WA government to consider also how it can restrict the design, manufacture and production of problematic materials. At present this is not reflected in the principles of the Plan. Nationally, WMRR has been advocating for greater emphasis on avoiding the creation of these materials at first instance, which requires a far stronger focus on product design, so as to eliminate the creation of hard-to-recycle and/or single-use materials. Avoiding the creation of these types of materials is preferable to managing them at end-of-life.</p> <p>The WA government needs to implement initiatives that ‘level the playing field’, for example mandating the use of Australian recycled material and demonstrating leadership itself by preferencing recycled material in procurement policies. Green procurement by government must also include key actions such as enforceable procurement targets, across all levels of government, and if not utilised an explanation of why not.</p>
Objectives	<ul style="list-style-type: none"> <li>• Are there any other stakeholders (audiences or key organisations) or roles within these stakeholder groups that should be included? Please provide your suggestions.</li> </ul>	<p>WMRR recognises that the list of stakeholders on pages 10-12 is quite comprehensive and captures those across the supply chain. However, the document does not grapple well with the concept of who is the generator of this material (rather assumptions are made) nor the role that they can play in avoiding/ reducing and classifying</p>

		<p>materials. Further the role of the supply chain in buying back or using these materials as inputs is also not clear. This may be in part because the facilities referenced are in some instances reprocessing facilities and others simply sorting.</p> <p>Finally, the role of broader government with this strategy is key to it (and the sectors) success. As mentioned about a real commitment to purchasing recycled materials from government requires the Department of Transport and Roads to be at the table (as seen in Victoria with EcologiQ), the Department of Planning and its role in facilitating delivery is also key, as well as Treasury being able to support infrastructure spending on recycled materials (which is spending the same money differently!).</p>
<p>Infrastructure capacity needs in 2030</p>	<ul style="list-style-type: none"> <li>• Do you favour a low-risk approach or business as usual approach to landfill capacity-based assessments? Why is that?</li> <li>• Has risk been appropriately considered in the low-risk approach?</li> <li>• What other risks or factors need to be considered to project landfill capacity?</li> </ul>	<p>The low-risk approach appears to be the correct approach to take given the uncertainty faced by climate change and natural disasters to date. We support this cautious approach also given the fact that avoidance targets and broader targets around resource recovery are not being met by any state at this time.</p> <p>It's unclear from this document if the risk approach taken is sufficient given the absence of some material streams, lack of clarity of data relied upon and complete absence of data in some instances.</p>
<p>Projections for 2050</p>	<p>Are there any additional macro trends or new waste streams that need to be considered for 2050?</p>	<p>Consideration must be given to the impact that climate change legislation will have globally, for example the removal of organic streams from landfill, use of lower carbon materials and ideally less fossil fuel products in circulation.</p>

		<p>WMRR supports regular updates to the plan to ensure that it remains relevant and that emerging trends are captured. The plan should be the go-to document with up-to-date data and modelling that both policy makers and industry rely on.</p>
<p>Infrastructure priorities</p>	<p>Are the opportunities to support infrastructure capacity need listed above aligned with your organisation's infrastructure priorities? Why/why not?</p> <p>Are there any other opportunities to support infrastructure capacity need that should be included? Please explain your rationale, including any evidence or source data.</p>	<p>WMRR has included a number of materials throughout this response that require greater consideration and clarity (e.g., MRF glass, timber, hazardous, textiles, etc). Ideally the Plan should be recast based on material streams and supply chain, supported by clear planning framework and market strategy for the material steams (such as the organics strategy) given that this is how the industry operates, i.e., e-waste operators do not tend to do clinical, plastics remanufacturers do not do compost. The current plan does not enable this thinking.</p> <p>Further at present the document does not reflect carbon considerations, meaning that infrastructure that could assist with this is not easily prioritised or recognised- possibly limiting current funding pathways to support such facilities, e.g., Australian Carbon Credit Units, ARENA opportunities, etc.</p>
<p>Risk considerations</p>	<p>What other risks and contingencies need to be considered in terms of infrastructure development or capacity?</p> <p>What other risks and contingencies need to be considered in terms of the Infrastructure Plan itself?</p>	<p>Hazardous including clinical material requires clear consideration as was seen through COVID-19 (particularly if state borders close again).</p> <p>WMRR would also encourage a specific disaster waste strategy be developed for WA, that includes infrastructure preparedness given the increasing incidence of such events.</p> <p>Whilst the contingency comments noted that the plan was at risk if the waste strategy targets were not met (which they will not be),</p>

		<p>the plan should be modelled to clearly demonstrate what is required to achieve this (via a delivery plan starting in 2024 given we are almost at 2024 and the data supplied is from 2020). This should include market strategy and delivery pathway steps that government plans to take to ensure targets are met.</p>
<p>Monitoring and evaluation of the Infrastructure Plan</p>	<p>Does the plan clearly explain how the infrastructure needs proposed for each region were informed? Why is that? Is there anything else you would like to know about how the infrastructure needs were informed?</p> <p>Are there any other considerations you would like to see included when assessing the infrastructure need for a region?</p> <p>Are the infrastructure needs proposed for each region aligned with your organisation's infrastructure needs?</p> <p>How do you see your organisation using these infrastructure needs to make infrastructure plans and decisions?</p> <p>What do you think will be the barriers to using these infrastructure needs to make infrastructure plans and decisions?</p> <p>Are there any other infrastructure needs that should be included? Please explain your rationale, including any evidence or source</p>	<p>This document would be enhanced by the provision of the Talis documents that underpin it. It is unclear what market assumptions were utilised to understand resource recovery rates or demand.</p> <p>Further the document excluded the largest operating product stewardship scheme, the container deposit scheme, however there is no clarity of other intended schemes in this document and regulation that may ensue, such as the recently announced investigation in to tyres and e-waste schemes- both of which can have a marked effect on infrastructure given financial support that may occur and markets that may eventuate.</p> <p>Further the exclusion of these existing sites, potentially limits the ability to consider these sites for other schemes or as aggregation points throughout WA.</p> <p>WMRR has mentioned a number of additional infrastructure requirements in this document.</p>