



Ms Michelle Andrews  
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Dear Ms Andrews

**Re: Review of Western Australia's Waste Avoidance and Resource Recovery Strategy 2030**

Thank you for the opportunity to provide feedback on the department's *Review of Western Australia's Waste Avoidance and Resource Recovery Strategy 2030* directions paper. 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 2,000 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.

It is WMRR's submission that a significant paradigm shift is urgently required in WA (as well as in the Strategy), to recognise the essential role of the WARR sector within a systems-based framework for material management. To develop this framework, the WA government needs to work more closely with all of industry and the supply chain to establish this thinking, with far greater policy emphasis being placed on creating a resource efficient WA community that values materials, reduces reliance on virgin materials, and works to mitigate carbon. The current Strategy is extremely linear in thinking and to date fails to capitalise on the real benefits that will be created for WA with the entire WARR sector playing a critical role in managing essential materials and creating real value for the environment, community and economy.

The National Waste Report 2022, states that WA will need to recover an additional 1,300,000 tonnes over the next seven (7) years to meet the 2030 national target. It is unclear how these resource recovery targets can be met in WA in the absence of a significant shift towards investment in resource recovery infrastructure (including strategic planning) across all streams, increased emphasis on green procurement and establishing the correct economic settings including market development and demand for secondary raw materials. Not meeting these targets will affect the linked economic (jobs) and environmental (carbon mitigation) benefits, as well as the stated government desire to achieve a circular economy- which requires far greater emphasis on generator responsibility, behavioural change, regulation and further utilisation of economic levers.

WMRR strongly urges a rethink of the Strategy and approach taken to date by Government, noting that the current Strategy was developed in 2019. As part of reframing the Strategy, WMRR believes that it is vital that government reinforce the purpose of the landfill levy, which is an economic tool to

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place a value on material and drive resource recovery as well as recognise the true costs of landfilling (carbon, remediation, gas capture, etc). The levy's purpose is also intended to change disposal behaviour as recycling and recovery become attractive alternatives relative to landfilling. The approach by WA to date of not increasing the levy promotes the lowest order of disposal (landfill) as the cheapest option in the waste management hierarchy, inhibiting capital investment in recovery infrastructure. Which will in turn continue to see landfill as the cheapest option and prevent WA capitalising on the necessary capital investment and job creation resulting from resource recovery.

WA now has the opportunity to use updated data and knowledge to rewrite the Strategy from a solid starting point, to develop evidence-based targets, followed by clear and achievable actions, focusing on the entire waste and resource recovery system, all stakeholders and material types. WMRR urges government to capitalise on this opportunity. WMRR's detailed feedback can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan', positioned below the 'Yours sincerely' text.

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

**Submission:**

Issue	Comment
<p><b>Our performance</b></p> <p>What is the most important metric for tracking our performance?</p> <p>Where should we be focusing our collective efforts?</p>	<p>As noted above, WA is significantly behind in reaching the goals of the Strategy. WMRR submits that WA needs to focus on addressing priority materials across all streams, using data to proactively determine appropriate interventions and investments to achieve the targets. The focus needs to be a holistic approach that sets clear targets that are consistently tracked against.</p> <p>WMRR submits that the materials that require immediate attention in WA (according to the National Waste Report data) are organics, hazardous (regulated) waste, paper and cardboard and plastics. These are the top four (4) by tonnage that represent almost 1.2 million tonnes of resource recovery investment required to meet the 2030 targets. Individual strategies must be developed to address each material types, supported by clear actions and investment across the entire hierarchy (including avoidance) which then must be monitored in the Strategy.</p> <p>WA needs to continue to invest in data capture, interrogation, and analysis. For example, the report contains no real analysis of how progress towards the targets is tracking. Further there is no clarity as to whether the Strategy even if fully delivered would meet the targets sought (i.e., how do ongoing commitments contribute to the overall targets). It is vital that a reworked Strategy clearly identifies the impacts of actions and investments and ensures that they can be monitored and reported on.</p>
<p><b>Our environment – key developments since 2019</b></p> <p>What trends and societal changes do you think are most relevant for consideration as part of the waste strategy review?</p>	<p>In recent years the link between consumption and carbon is increasingly being made, with an increased emphasis on avoidance and strategies such as re-use and repair. There is absolutely greater knowledge and desire by the community to act on creating ‘circular systems’ for products and materials, as well as the elimination or problematic materials.</p> <p>It is vital that the WA government build on this and when developing material strategies mentioned above, it utilises the entire hierarchy including avoidance and design principles to ensure that the correct material is brought to market with systems to support. It is important however that government show leadership in designing such systems and not take simplistic myopic stances on materials such as plastic that do play an important role in areas such as food waste avoidance (which has a greater carbon impact than plastic). Government must understand the complex policy settings</p>

	<p>and help the community to solve these issues, with a strong understanding of the carbon savings that can be made by doing this well.</p> <p>We have also seen WA embrace the container refund scheme since the Strategy was developed, which has demonstrated that producer responsibility schemes have a clear role in material management in WA. The reality is that there is a cost with managing material, and it makes sense to at times utilise producer responsibility regulation to drive better recovery outcomes. WA should identify further opportunities for this to occur, creating funding and investment opportunities as well as recovery outcomes in WA.</p>
<p><b>Our strengths and opportunities</b></p> <p>What do you think are WA’s strengths and opportunities which we could harness to improve our waste and recycling performance?</p> <p>How do you think we can best harness these strengths and opportunities?</p>	<p><u>Strategic infrastructure plan:</u> As noted, DWER are working to develop a strategic infrastructure plan and WMRR has provided feedback on this (26 June 2023). We strongly recommend the development of a comprehensive strategic infrastructure plan that encompasses the entire state, facilitating coordinated and efficient infrastructure development that understands the material streams and flows across all areas of MSW, C&amp;I and C&amp;D and provides guidance for industry.</p> <p><u>Lack of targets/actions on waste to avoidance:</u> WMRR notes that although there is a clear target for avoidance, the Strategy lacks sufficient focus or clear measured actions to achieve this outcome. It is essential to prioritize targets/ actions higher up the waste management hierarchy and incentivise initiatives that aim to prevent waste creation in the first instance, including awareness campaigns, product design improvements, and promoting sustainable consumption practices. As noted above material strategies should focus at first instance on avoidance- a great example of this being with organics- we should educate to avoid the creation of organic waste <i>before</i> building infrastructure given both the adverse impact on carbon and cost of living, as well as experience overseas of creating stranded assets once the community genuinely avoids creating this stream! WA must also set measures and collect data on these actions.</p> <p><u>Education and behavioural change:</u> Education and behavioural change initiatives play a vital role in achieving waste reduction and resource recovery targets. These efforts should consider regional variations and be well-prepared and effectively communicated including utilising plain language and harmonisation considerations.</p>

	<p>Messaging to-date struggles to raise the need to be resource efficient, value material and consider consumption habits, taking 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><u>Carbon considerations:</u> The current Strategy lacks significant consideration of carbon emissions, how these could be mitigated, nor does it look to address materials that have the greatest emission impact. Given the urgent need to address climate change, and the legislated reduction targets it is imperative to incorporate carbon reduction measures into the Strategy. An example of this is the lack of a penalty or cost associated with carbon emissions associated per tonne of waste charged at landfill gates and the emissions profile associated with each tonne.</p>
<p><b>Our vision</b></p> <p>Does the current vision in the waste strategy reflect your ambitions for a sustainable WA?</p>	<p><u>Circular economy focus:</u> The vision needs to move away from a low-waste focus which perpetuates end-of-pipe management and instead embrace resource efficiency and recognise the true cost and value of materials. WMRR observes a lack of actions in the Strategy aimed at designing out waste and pollution. There is also no published circular economy strategy from the WA Government. There needs to be a clear direction set by government on WA’s circular economy intent and the proposed transition, as well as how this Strategy supports this.</p> <p>The Strategy also fails to target those who generate and create waste the focus is on the WA government and consumers. The data or lack thereof speaks volumes for the disconnect with the C&amp;I waste stream. Businesses need to be included in the Strategy with actions that support better design and material selection (higher order waste management hierarchy), along with diversion and recycling, and as mentioned above genuine investigation into more use of producer responsibility regulation as a tool for reaching recovery targets (e.g. tyres, textiles and e-waste).</p>
<p><b>Our objectives</b></p> <p>Are the current waste strategy’s objectives helpful in driving priorities and informing waste</p>	<p><u>Systems Thinking/ Support for Higher Order Behaviours</u> The Strategy does not facilitate a systematic approach to managing material, nor establishing systems or infrastructure that would support this approach for example, support for re-use and repair systems. The Single Use Plastics bans were a real opportunity for government to look at funding behaviour</p>

<p>management decisions by governments, industry and the community?</p>	<p>change systems such as re-use infrastructure or initiatives that would also be integral in WA becoming a resource efficient state rather than to pivot to other items that are potentially still single use such as compostables (i.e., still waste and counter to the 'avoid' objective). The lack of systems thinking means policy developed tends to be reactive rather than proactive, and there is no clear future plan or higher order thinking that policy is able to be tested against. This is further exacerbated by the interdependence of some materials as mentioned above such as plastics and food waste.</p> <p>WMRR understands that the WA government has determined its preferred resource recovery framework, however industry is yet to be advised of this despite over three (3) years passing. It is crucial that WA establish a robust regulatory framework to develop General Environment Duties and to avoid end of waste codes which have proven to be burdensome and slow. With a focus on higher order waste management hierarchy actions the government can support (across all levels of government and sectors) innovative solutions and sustainable design rather than focusing on end-of-life remediation.</p>
<p><b>Our targets</b></p> <p>Do our current targets reflect the relative priority placed on each objective?</p> <p>Do we need additional targets to monitor performance?</p>	<p>WMRR notes that the National recovery rate target for 2030 is 80% while WA's is 75% and would encourage WA to adopt a consistent approach.</p> <p><u>Commercial and Industrial Material (C&amp;I):</u> There needs to be real targets set within C&amp;I and a greater understanding of the make-up and generation patterns of this waste stream if recovery targets are to be achieved. It's also important to note that it is impossible for WA (in fact all jurisdictions) to meet their recovery targets unless all material streams are prioritised.</p> <p><u>Organics targets and funding:</u> Organics diversion requires a clear avoidance campaign delivered akin to <i>Love Food Hate Waste</i> to minimise waste created at first instance and save householders upfront costs. The Strategy needs mandatory organic targets (within MSW and C&amp;I) and adequate funding to drive progress. On page 14 of the directions paper it is implied that once FOGO has been rolled out in MSW this will raise the recovery rate from 20-35% to 55-65% by 2025, with limited supporting data. As mentioned above, WMRR urges WA to look at the organics system in its entirety and develop a holistic strategy that includes recognition that avoided food waste is the highest priority, and then the possibility of energy recovery as well as compost when it cannot be avoided given the need to have targets and facilities</p>

	<p>for C+I materials as well. Further government must show leadership and buy these products back – driving market demand in all areas!</p>
<p><b>Our principles</b></p> <p>Do you think current waste strategy principles adequately inform waste management decisions by government, industry and the community?</p> <p>Should the updated waste strategy include additional principles?</p>	<p>The five (5) principles are a solid starting point, however they have too great an emphasis on managing waste at end-of-pipe (making accessible, safe, best practice), as opposed to recognising what should be delivered here is a resource recovery strategy (not a linear strategy) promoting higher order use and creating systems and infrastructure to support this.</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 compete with virgin products- that is creating a marketplace for these secondary raw materials. There is no principle at present that 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><u>Procurement targets</u></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. This can be achieved by acknowledging that landfill, the lowest order and least desirable waste management hierarchy outcome, cannot remain the cheapest option. 2030 targets will not be achieved unless there are increased economic disincentives for landfill such as materially higher levies and/or carbon being charged at the gate.</p> <p>WMRR also recommends examining the successful practices implemented in Victoria, where the responsibility for classifying and tracking waste lies with the waste generator (Part A of the tracking system, as well as legislative obligations), such an approach will enhance transparency and accountability throughout the waste management process.</p>

<p><b>Our priorities</b></p> <p><b>Materials</b></p> <p>Is it useful for the waste strategy to identify focus materials? If so, which materials are most important for delivering the objectives and targets in the strategy?</p>	<p>WMRR submits that the materials that require immediate attention in WA are organics, hazardous (regulated) waste, paper and cardboard, and plastics. These are the top four (4) by tonnage, representing over a million tonnes of material that needs to be diverted by 2030. Clear interventions and investment across the entire hierarchy (including avoidance) must be developed and monitored in the Strategy.</p> <p><u>Demand for recycled materials:</u> WA and Australia in general, have failed to date to recognise that secondary raw material (recycled material) can easily replace virgin materials and there are many great environmental and economic reasons for doing so (e.g., reduced energy demand and carbon impacts). As such we continue to see a chronic lack of market demand for recycled materials, with not enough emphasis by governments in creating both the market and regulatory settings to address this. Given the cost in collecting, sorting, and processing “waste materials” it is unreasonable to assume that the commercial considerations of virgin versus recycled materials will be the same. However, the consequence for WA not utilising recycled material is substantial – increased carbon emissions, additional energy, reduced jobs, and investment in manufacturing.</p> <p><u>Organics</u> The lack of strategic facility planning and procurement across both commercial and municipal streams are also contributing to these costs as councils at present are being forced to go it alone. WA is not only underestimating the costs of these services but also underestimating the linked benefits from strategic planning, developing sustainable products, reducing carbon emissions and creating employment.</p>
<p><b>Sectors</b></p> <p>What are the priorities for C&amp;I waste? What types of actions could best support better C&amp;I performance? Are there other sectors (outside of MSW, C&amp;D and C&amp;I) that we should engage with to improve our waste and recycling performance?</p>	<p>There is a pressing need for the WA government to have a greater understanding of the make-up and generation patterns of the C&amp;I waste stream. WMRR suggests conducting an audit to gain these insights into the composition and characteristics of this stream. With the assistance of these findings and existing data, targeted strategies must be developed to increase diversion rates and support infrastructure then the focus will be to manage waste generated across multiple streams, resulting in economies of scale for feedstock. WMRR encourages WA to look to the strategies being implemented in NSW, where food waste collection from relevant commercial businesses has been mandated by 2025.</p>



<p>How can we capture the innovation and expertise already in WA, for example in the mining and agricultural sectors, to improve our performance?</p>	
<p><b>Collection systems</b></p> <p>What are the priorities for delivering better waste collection systems for the future? What opportunities do we have to implement these priorities in growing population centres?</p> <p>How do you think we can leverage off existing schemes (such as Containers for Change) to further improve waste collection systems across WA?</p>	<p>Identifying and reserving strategic parcels of land to create such transfer stations as population grows is vital, as the reality is that this population growth will be where the generation growth will occur. WMRR encourages WA to create a genuine strategic infrastructure plan that utilises a statewide transfer station network to aggregate and manage material throughout WA and then build facilities at scale.</p> <p>These transfer networks can also be utilised (if planned well) to act not only as hubs for collection and transfer but community recycling centres. Schemes such as the Containers for Change have demonstrated that the community supports separation at source and will travel to return materials that cannot be placed at kerb. collocating stewardship schemes at these sites (e.g. paint, batteries, containers, soft plastics), can assist in supporting return and recovery rates by clearly having a location for return of such materials.) Not all products can safely be managed at kerb, but by offering a clear destination for return the community can respond accordingly.</p>
<p><b>Regional and remote Communities</b></p> <p>What sort of opportunities might be effective in delivering better waste outcomes in regional and remote communities, including remote Aboriginal communities?</p>	<p>WMRR recommends the development of a statewide infrastructure strategy that clearly understand how best to utilise a hub and spoke network to ensure that regional communities can have access to infrastructure.</p> <p>Regional plans may be necessary based on consumption and material flows, and may be able to utilise reverse logistics for some material streams. Further consideration may be appropriate for a specific First Nations strategy for waste and resource recovery, similar to what has been developed in Queensland, with specific input from affected communities.</p>
<p><b>Aboriginal engagement</b></p> <p>How do we harness and apply the skills and experience of Indigenous Australians to an updated waste strategy? In addition, what</p>	<p>Further to the point above WA should consider a specific First Nations people waste and resource recovery strategy. WMRR suggests reviewing Queensland's as an example.</p>

<p>approaches will support better waste management outcomes for Indigenous Australians?</p>	
<p><b>Waste levy</b></p> <p>Do you think further increases to the levy rate are required to reduce waste to landfill? How can the waste levy more effectively influence waste management practices and incentivise increased material recovery?</p>	<p>Yes! The WA government's approach to the waste levy has regrettably hindered investment in the state's resource recovery infrastructure, and as mentioned above needs to be reframed to recognise the vital role the levy plays as an economic tool to attribute the true value to material and create a resource efficient state. In WMRR's view the current levy remains too low, and the slated \$15 increase in 2024-25 fails to catch up with inflation from 2018, nor does it keep pace with other state levies, or more importantly incentivise investment in resource recovery which has many positive impacts on both the community, economy and the environment.</p> <p>WMRR recommends conducting a comprehensive analysis of the levy structure to ensure an appropriate price signal is set, including by geography, that encourages capital investment in WA's WARR sector. Especially considering the significant increase in resource recovery infrastructure costs (the price of services and construction materials and delivery in some cases has increased by 30-50% post COVID-19), the private sector in particular requires strong signals from government and confidence in the sector to invest funds that align with infrastructure asset lifecycles (20+ years).</p> <p>Although the levy is mentioned throughout the report no information has been provided on how these funds have been committed and the impact that this funding has had (e.g., number of tonnes diverted/ recovered). WMRR encourages DWER to be more transparent with both its' reporting and requirements in relation to what is funded, why and how the contribution of these funds is involved in achieving the stated targets. Industry would also welcome transparency on the future level of investment beyond existing funding programs, as this relates to forward infrastructure planning and needs assessments across all streams.</p>
<p><b>Responding to emergencies</b></p> <p>What sort of mechanisms do you think are effective in responding to sudden changes to waste generation rates or processing capacity?</p>	<p>There is currently an absence of strategic planning for disaster events and resultant impacts. Whilst WA has demonstrated its ability to pivot and respond to natural disasters, there is not a comprehensive disaster waste management plan, which not only addresses these events when they occur, but also looks at creating readiness within the facility network for these events that go beyond business-as-usual capacity. This is particularly true for infrastructure planning needs.</p>