

Submission on the DWER Customer Service Standards for the Collection Network



November 2018

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission therefore represents the consolidated view of Western Australia Local Government. However, individual Local Governments and Regional Councils may have views that differ from the positions taken here.

Due to meeting schedules, this Submission is yet to be considered and endorsed by MWAC. The Department will be informed of any changes to this Submission following consideration by the Municipal Waste Advisory Council on Wednesday 12 December.

Executive Summary

Use and Scope of the Customer Service Standards

The *Customer Service Standards for the Collection Network* will play a key role in identifying the level of service provided through the Western Australian Container Deposit Scheme. It will also inform how the Scheme Coordinator's undertakes procurement of the collection network. The Association considers that for the document to be a Customer Service Standard additional information should be included.

Recommendation: That the Government sets Customer Service Standards for the Container Deposit Scheme that addresses:

- **Operational standards for refund points**
- **Level and type of service provided**
- **Approximate location and number of refund points**
- **Community engagement**
- **Measures of performance**
- **Complaints and Review.**

Designing Accessible Product Stewardship Schemes

The accessibility and convenience of other Australian Product Stewardship Schemes should be examined closely, to determine what factors can be used to deliver workable Scheme coverage requirements in Western Australia. Key lessons from the implementation of the National TV and Computer Recycling Scheme and the NSW and SA Container Deposit Schemes include:

- Regional access targets are required to ensure equitable access to services is provided
- Minimum standards on opening hours / days are required to deliver equitable access to services
- The co-location of refund points with existing recycling infrastructure provides an additional incentive for the community to return containers and other material
- A range of amenity and access issues need to be addressed when siting RVM's. The advantages and disadvantages of using RVM's is dependent on location.

Operational Standards for Refund Points

To ensure those refund points that do not require planning approval operate in accordance with a minimum standard, the Government must outline its expectations on how refund points are to operate in the Customer Service Standards. The procurement processes to appoint a Scheme Coordinator and the collection network must also reflect these expectations, and deliver refund points that are managed in accordance with a minimum operational standard.

Recommendation: That the Customer Service Standards include operational standards for refund points as specified in the WAPC Position Statement: Container Deposit Scheme Infrastructure.

Recommendation: That the State Government requires the Scheme Coordinator to establish systems that ensures refund point operators are aware of, and agree to operate in accordance with the Customer Service Standards.

Level and Type of Service Provided

In the interests of maintaining consistency with other jurisdictions, the State Government must establish baseline expectations on the level (opening hours and days) and type (full time or flexible) of service provided through the Container Deposit Scheme. The NSW approach of specifying opening hours and days could be adapted to the Western Australian context, by setting minimum opening hours and days in Metropolitan areas, Regional Centres, Remote areas, Aboriginal Communities and Island Communities.

Refund point operators could be provided with an opportunity to propose an alternate approach that delivers the outcomes sought through the specified minimum service standards on the level and type of service provided at refund points. DWER would assess and approve any reduction in service proposed, in consultation with the local community. Where no parties express an interest in operating a refund point, the Scheme Coordinator would then be required to provide the minimum service standards specified by Government.

Recommendation: That the Customer Service Standards define minimum service standards on the level (opening hours and days) and type (full time and flexible) of service provided in:

- **Metropolitan areas:**
 - **Full time:** 35 ordinary hours each week, including at least 8 weekend hours.
 - **Flexible:** 24 ordinary hours each week, including at least 8 weekend hours.
- **Regional Centres**
 - **Full time:** 35 ordinary hours each week, including at least 8 weekend hours.
 - **Flexible:** 24 ordinary hours each week, including at least 8 weekend hours.
- **Remote**
 - **Population of the entire Local Government area >2,500:**
 - **Flexible:** 24 ordinary hours each week, including at least 8 weekend hours.
 - **Population of the entire Local Government area <2,500:**
 - **Flexible:** 16 ordinary hours each 2-week period, including at least 8 weekend hours.
- **Aboriginal Communities:**
 - **Flexible:** 16 ordinary hours each 2-week period, including at least 8 weekend hours.
- **Island Communities.**
 - **Flexible:** 16 ordinary hours each 2-week period, including at least 8 weekend hours.

Recommendation: That the procurement process for the collection network includes the minimum service standard on the level (opening hours and days) and type (full time and flexible) of service.

Recommendation: That refund point operators are provided with an opportunity to propose an alternate approach to the DWER that delivers the outcomes sought through the specified minimum service standards on the minimum level and type of service provided at refund points.

Recommendation: That the DWER assesses and approves any proposed reduction in services, in consultation with the local community.

Recommendation: That the Scheme Coordinator is required to provide the baseline level and type of service specified by Government, where no parties express an interest in operating a refund point.

Recommendation: That a consultative approach used to determine the type of service provided to Aboriginal Communities and Island Communities.

Approximate Location and Number of Refund Points

Ensuring Accurate Population Estimates

There are concerns that the proposed network will not result in a number of refund points that provides a sufficient level of service to the Western Australian community. As the rate of beverage consumption at a regional level is not currently available, population data could be used as a proxy value to determine access to the Scheme. In doing so, accurate estimates of population will be essential. The Department must use additional datasets that capture transient and dispersed populations. Population growth must also be factored into the Customer Service Standards, to ensure the number of refund points increases in line with population growth.

The dataset used by the Department to model the approximate location and number of refund points means that some communities (and Local Government areas) are not allocated a refund point.

Recommendation: That the DWER examines the following datasets to ensure services are provided to transient and dispersed populations:

- **Population centres**
- **Main Roads**
- **Tourism WA**
- **Location and number of mine sites**
- **Aboriginal Communities.**

Recommendation: That the DWER uses the population of the entire Local Government area to determine eligibility for a refund point.

Ensuring Equitable Access for Western Australia

In designing the Customer Service Standards, the Association considers that alternative approaches will be required in different areas of Western Australia. The dataset used by the Department to model the approximate location and number of refund points means that some communities (and Local Government areas) have not been allocated a refund point.

Recommendation: That the greater number of refund points is allocated to the metropolitan area (126 in total), with 95 being Full time and 31 Flexible.

Recommendation: That a greater number of refund points are allocated to Regional Centres based on the entire population of the region and the additional populations serviced. Further investigation and consultation is required with Regional Centres on this issue.

Recommendation: That one flexible refund point is provided per Local Government in regional and remote areas, where the population centre based approach has not delivered any form of service.

Recommendation: That the number of Aboriginal Communities provided with a refund point initially, are the same locations as those participating in the Essential and Municipal Services Upgrade Program.

Recommendation: That the Shires of Cocos (Keeling) and Christmas Island be allocated flexible refund points.

Potential Beverage Consumption

An alternative way to determine the approximate location and number for refund points, is to identify areas with higher rates of beverage consumption.

Recommendation: That the DWER reviews the Australian Business Register to identify areas where there is a greater concentration of beverage retailers.

Community Engagement

The Government must establish minimum requirements for messaging, branding and methods of engaging the community in the Customer Service Standards. The Scheme Coordinator must commit to collaborating with other stakeholders to ensure that promotional activities reflect the consistent communications approach (as agreed by Material Recovery Facility operators), and complement the work of other Product Stewardship Schemes. Promotional material should be made available to other stakeholders such as Local Government, to use in generating awareness of the Scheme, prior to implementation.

Recommendation: That the draft Customer Service Standards establish minimum requirements for messaging, branding and methods of engaging the community.

Recommendation: That the Department requires the Preferred Scheme Coordinator to collaborate with other stakeholders, to:

- **Maintain consistency with the consistent communications approach**
- **Complement the work of other Product Stewardship Schemes and existing Government initiatives**
- **Ensure promotional material is provided to other stakeholders in a range of formats for use in generating awareness of the Scheme.**

Recommendation: That the Scheme Coordinator undertakes community engagement prior to implementation of the Scheme.

Measures of Performance

Performance of the Scheme

Negotiations with the Preferred Scheme Coordinator on specific criteria, targets and reporting must ensure that the objectives of the Scheme are measurable. The WALGA Submission on the DWER Western Australia Container Deposit Scheme Discussion Paper (October 2017) provided substantive commentary on this issue and the recommendations are included in this Submission. To ensure the community has a clear understanding of the Targets and Measures of Performance for the Scheme, these matters must be included in the Customer Service Standard.

Recommendation: That the Targets for the Scheme include:

- **State wide return rates for each class of container material**
- **Regional return rates for each class of material**
- **Changes to beverage container volume in the litter stream**
- **Accessibility and geographic coverage to the Scheme**
- **Appropriate sharing of costs associated with the Scheme.**

Recommendation: That the Measures of Performance for the Scheme include:

- **Resource recovery and reduction of recyclable material to landfill: including reporting on local market development options for materials to ensure long term sustainable markets**
- **Community participation and benefit: including reporting on the number of people accessing drop off points proportional to the population of the area and the amount of funding provided to community groups through the Scheme**
- **Jobs created: reporting on jobs created through the implementation of the Scheme**
- **Compliance with the Scheme: reporting any instance of non-compliance and enforcement actions undertaken.**

Recommendation: That baseline data be collected before the Scheme commences to determine current levels of:

- Litter in the range of different areas which will access the Scheme
- Eligible containers in the kerbside system.

Performance of the Scheme Coordinator

The Customer Service Standards should include information on how the Government will manage the performance of the Scheme Coordinator, such as outlining the compliance regime that will be established through the Waste Avoidance and Resource Recovery Amendment (Container Deposit) Bill 2018.

Recommendation: That any assessment of the Scheme Coordinator's performance is linked to its achievement of the Scheme's objectives.

Performance of Refund Points

The most important measure of the Scheme's performance, is the degree to which the overall collection network is utilised. Specifically, the number of containers returned to each refund point. Refund points can be monitored over time to ensure they are utilised. If a refund point is not utilised, operational adjustments could be pursued that ensure:

- Opening hours, days and location of collection sites / events facilitate community access
- An appropriate level and type of advertising is undertaken for each collection site / event
- That the Local Government is provided with sufficient notification of a collection event (for flexible refund points) to promote it to the community.

Recommendation: That the Department sets reporting requirements and targets to monitor the utilisation of refund points in different geographical regions of Western Australia, with respect to the number of containers returned at each refund point.

Complaints and Review

For the Customer Service Standard to be comprehensive it should include the review mechanisms for the Scheme and the complaints processes that are in place. The Department has indicated that the review mechanism is in line with the legislative review process for the Waste Avoidance and Resource Recovery Act or at the Minister's discretion. The pathway for complaints about refund points is to the Scheme Coordinator. For complaints about the operations of the Scheme Coordinator the State Government would be the appropriate entity to receive this information.

Recommendation: That the Customer Service Standards outlines the:

- Review mechanism for the Scheme
- Complaints process for the refund points and Scheme Coordinator.

Through these additions to the Customer Service Standard, a comprehensive document will be developed which will facilitate community access and convenience for the Scheme. The amendments suggested increase the number of refund points considerably from the suggested 111 to 269.

1. Introduction

The Association appreciates the opportunity to comment on the *draft Customer Service Standards for the Collection Network*. Local Government in Western Australia supports the implementation of a best practice Container Deposit Scheme (CDS), that facilitates litter reduction, resource recovery and a reduction of waste to landfill, community participation and benefit, and a more appropriate distribution of the costs associated with container management.

The release of the draft Customer Service Standards is a significant milestone. Once finalised, this document will set the minimum standards for the collection network of refund points in Western Australia. The document will also inform how the Scheme Coordinator undertakes procurement of the

collection network. It is therefore imperative that the Customer Service Standards clearly outline the following customer service considerations:

- Operational standards for refund points
- Level and type of service provided
- Approximate location and number of refund points
- Community engagement
- Measures of performance
- Complaints and Review.

This Submission provides comment on the draft Customer Service Standards, with a focus on the drivers that influence accessibility, how lessons learnt in other jurisdictions apply to the Western Australian context and the evidence base used to design the draft Customer Service Standards.

2. Use and Scope of the Customer Service Standards

The use of the term 'Customer Service Standards,' implies that this document will address a range of customer service considerations. As this document will set the minimum standards for the collection network of refund points in Western Australia, and inform how the Scheme Coordinator undertakes procurement of the collection network, the final Customer Service Standards must include:

- Operational standards for refund points
- Level and type of service provided
- Approximate location and number of refund points
- Community engagement
- Measures of performance
- Complaints and Review.

The Association understands that some of these considerations have been discussed at the CDS Advisory Group and various working groups. Given the interrelated nature of these considerations, it is worthwhile including all of these matters in one document that sets the Standard for the Scheme. Further detail on the Customer Service Standards proposed by Local Government are included in Section 3 of this Submission.

The draft Customer Service Standards, and the Request for Proposal for the Scheme Coordinator, both highlight that the Government will use the final Customer Service Standards to set the minimum requirements for the collection network and that the Scheme Coordinator will be encouraged to exceed these minimum requirements. The provision of guidance on what the community and Local Government can expect from the collection network will assist in managing expectations during the implementation of the Scheme.

Recommendation: That the Government sets Customer Service Standards for the Container Deposit Scheme that addresses:

- **Operational standards for refund points**
- **Level and type of service provided**
- **Approximate location and number of refund points**
- **Community engagement**
- **Measures of performance**
- **Complaints and Review.**

3. Designing Accessible Product Stewardship Schemes

The design of the Scheme must ensure that the collection network provides equitable access to the Western Australian community. The draft Customer Service Standards indicate that an approach has been taken which is "*consistent with that used in other jurisdictions.*" The Association has provided feedback through a number of forums on the detriments of maintaining consistency with other States and Territories on the metrics used to determine accessibility and convenience standards and not

considering any other factors. As noted in the draft Customer Service Standards, “*Western Australia has a dispersed population with a diverse range of population densities.*”

The accessibility and convenience of other Australian Product Stewardship Schemes should be examined closely, to determine the factors that can inform the development of workable Scheme coverage requirements in Western Australia. Factors that have influenced the effectiveness of other Australian Product Stewardship Schemes are provided in the following case studies.

Case Study 1: National TV and Computer Recycling Scheme

The National TV and Computer Recycling Scheme (NTCRS) was the first Australian Product Stewardship Scheme to require reasonable access – through defined remoteness categories, population centres and distances travelled. In implementing the NTCRS, the Product Stewardship Arrangements have been largely driven by cost. To meet the national target, the Arrangements have concentrated their efforts in areas that yield large volumes of material and are relatively low cost to service. Only the minimum legislated number of access points are provided in high cost jurisdictions such as Western Australia. WALGA has questioned the accessibility of Western Australian sites. Specifically the location, operational hours, level of advertising and tonnes collected.

A comparison of the material collected by the three Arrangements that provided jurisdictional data for the 2016/17 Financial Year¹, shows that only 5.44% of collected material originated from Western Australia. Approximately 10% of the national population resides in Western Australia. To address this issue, there is a need for State/Territory based targets in addition to a national target.

Figure 1 provides a comparison of the kilograms collected by Arrangements in Western Australia in the 2016/17 Financial Year, using the different classifications of reasonable access. Arrangements have predominantly concentrated their efforts in the metropolitan area – with 92% of material collected in this region. With the exception of the Northern Territory and Tasmania, this finding is replicated in jurisdictions across Australia.

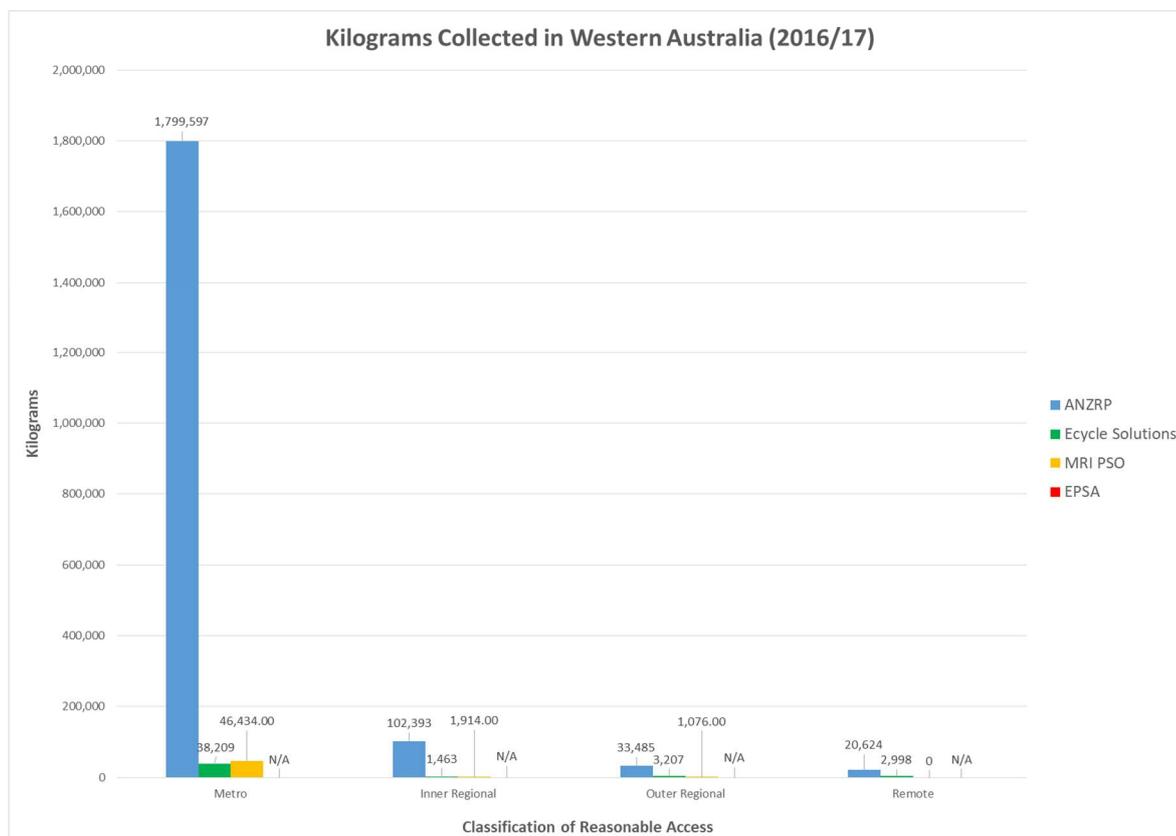


Figure 1: Comparison of kilograms collected by Arrangements in Western Australia (2016/17).

¹ Department of Environment and Energy (accessed June 2018). Approved Co-Regulatory Arrangements - Annual Reports. Available online. <http://environment.gov.au/protection/national-waste-policy/publications#research-ewaste>.

Key lessons from the National TV and Computer Recycling Scheme include:

- State/Region specific targets are required to ensure equitable access to services is provided
- Minimum standards on opening hours / days are required to deliver equitable access to services.

Case Study 2: NSW Container Deposit Scheme

In designing the New South Wales Container Deposit Scheme, specific measures were taken to avoid the issues that arose from the NTCRS reasonable access requirements. Minimum access requirements were set for distinct geographical zones of the State, using metrics such as distance, population centres and minimum operating hours.

The NSW Container Deposit Scheme network operates on a 'for profit' basis. As such, the Network Operator has been able to justify the provision of a greater number of refund points than the minimum requirement. However, feedback from the NSW EPA indicates that the minimum operating hours have been a useful tool to ensure equitable access to the Scheme is provided in all areas. Of particular importance, was the requirement that refund points operate during weekend hours, as this is when a significant proportion of containers are returned.

The structure of the WA Scheme differs to NSW, in that there is no a centralised Network Operator. The Association considers minimum operating hours (further discussed in Section 3.2) are a key consideration in ensuring that equitable access is provided to the Scheme. The handling fee alone may not provide a sufficient motivation for different refund point operators to provide services that meet the needs of the community, as opposed to their own operational needs.

If minimum operating hours are not prescribed in the design of the Western Australian Scheme, there is a risk that the Scheme Coordinator will establish cost effective refund points that may not be accessible or convenient to the community. Where no parties express an interest in operating a refund point in a specified area, the Scheme Coordinator will need to pursue alternative approaches. Services provided by the Scheme Coordinator must satisfy minimum service standards on the level (opening hours and days) and type (full time and flexible) of services provided, to ensure equitable access is provided to the community.

Key lessons from the NSW Container Deposit Scheme include:

- Regional access targets are required to ensure equitable access to services is provided
- Minimum standards on opening hours / days are required to deliver equitable access to services.

Case Study 3: SA Container Deposit Scheme

In considering reasonable access, it is worthwhile noting that the collection depots offered through the SA Scheme have become aggregation points for a range of other materials such as e-waste. By leveraging off infrastructure in this way, its ability to attract the community and generate additional revenue increases.

A key lesson from the SA Container Deposit Scheme includes:

- The co-location of refund points with existing recycling infrastructure provides an additional incentive for the community to return containers and other material.

Case Study 4: Reverse Vending Machines

From an accessibility point of view, the retail sector is well placed to accept containers and provide refunds back to consumers. Reverse Vending Machines have been used extensively in NSW and in some QLD locations to deliver collection services to the community. This approach has merits for retail outlets in metropolitan areas, where machines can be serviced and maintained. There are a range of amenity and access issues which need to be addressed when siting RVM's. If RVM's do not present a cost effective, reliable and locally managed collection solution, an alternative approach will be required. It is important that the Government understands the differences in providing services to metropolitan and non-metropolitan areas. Installing RVM's in remote areas may not be cost effective from either an operational or servicing perspective.

A key lesson from the use of Reverse Vending Machines in NSW and QLD includes:

- A range of amenity and access issues need to be addressed when siting RVM's. The advantages and disadvantages of using RVM's is dependent on location.

3.1 Operational Standards for Refund Points

There are a number of operational considerations which can influence the accessibility and convenience of the collection network. These considerations relate to how refund points operate in practice and the public's perception of the Scheme. Public perception is likely to be linked to the experience of returning containers to a refund point. Specifically, if this transaction is convenient and easy to undertake.

The Association is working with the DWER and the Department of Planning, Lands and Heritage to provide guidance to Local Government planning authorities on the assessment of refund points that may or may not require development approval under the *Planning and Development Act 2005*. The focus on addressing planning considerations early in the process has been an important lesson learned from the implementation of the NSW and QLD Schemes. The approach in WA has highlighted, and will address, considerations such as noise, odour, litter, parking, disability access, servicing access, visual appearance, third party advertising, zoning etc. Through this process it has been identified that there will be refund points that do not require planning approval.

To ensure a consistent approach is used to establish refund points, and that the public experience of the Scheme is consistent, the Government must clearly identify its expectations of refund points in the Customer Service Standards. The procurement process to appoint a Scheme Coordinator presents an opportunity to ensure this entity has systems in place that will deliver on the expectations of Government. The procurement of the collection network provides another opportunity to ensure refund point operators demonstrate how their site will meet the minimum operational standards. An agreement that activities will align with the operational standard would then form part of the Contract between the refund point operator and the Scheme Coordinator. Through the procurement process for the collection network, it should also be a requirement that refund point operators engage with the relevant Local Government to ensure planning approvals are sought if necessary. Where no parties express an interest in operating a refund point, the Scheme Coordinator would then be required to provide services that meet the minimum operational standard.

Recommendation: That the Customer Service Standards include operational standards for refund points as specified in the WAPC Position Statement: Container Deposit Scheme Infrastructure.

Recommendation: That the State Government requires the Scheme Coordinator to establish systems that ensures refund point operators are aware of, and agree to operate in accordance with the Customer Service Standards.

3.2 Level and Type of Service Provided

The Customer Service Standards must specify the minimum level and type of service that is provided at full time and flexible refund points. Section 4 of the draft Customer Service Standards states:

“Full time refund points are expected to reflect full time business operations. It is expected that a minimum number of hours per week will be specified to provide consumer convenience, including at least some service outside of regular office hours. Flexible refund points are intended to meet the requirements of smaller or fluctuating populations and could be provided on a part time, seasonal, mobile, or event based (pop-up) basis.”

WALGA accepts that services will be provided in different ways at permanent and flexible refund points, for example mobile refund point. However it is imperative that the level and type of service provided at both full time and flexible refund points is clearly stated in the Customer Service

Standards as this document will inform the procurement and establishment of the collection network. It is understood that the Government’s intent is for flexible refund points to operate on a full time basis if they wish. However, this does not reflect how those organisations that coordinate existing Product Stewardship Schemes (refer to Case Study 1) have chosen to provide services in the absence of such definitions.

Local Government considers that the Government must establish baseline expectations on the level (opening hours and days) and type (full time or flexible) of service provided. Expectations on minimum operating hours were clearly outlined in the design of the NSW and ACT Schemes. Feedback from the NSW EPA indicates that the minimum operating hours have been a useful tool to ensure equitable access to the Scheme is provided in all areas. Of particular importance, was the requirement that refund points operate during weekend hours, as this is when a significant proportion of containers are returned. The NSW approach of specifying opening hours and days could be adapted to the Western Australian context, by setting minimum opening hours and days in Metropolitan areas, Regional Centres, Remote areas, Aboriginal Communities and Island Communities.

Table 1: Recommended minimum opening hours and days.

	Metro	Regional Centres	Remote areas (Population of the entire Local Government area >2,500)	Remote areas (Population of the entire Local Government area <2,500)	Aboriginal Communities	Island Communities
Opening hours and days	<p>Full time: 35 ordinary hours each week, including at least 8 weekend hours.</p> <p>Flexible: 24 ordinary hours each week, including at least 8 weekend hours.</p>	<p>Flexible: 24 ordinary hours each week, including at least 8 weekend hours.</p>	<p>Flexible: 16 ordinary hours each 2-week period, including at least 8 weekend hours.</p>	<p>Flexible: 16 ordinary hours each 2-week period, including at least 8 weekend hours.</p> <p>Type of service to be determined in consultation with Communities.</p>	<p>Flexible: 16 ordinary hours each 2-week period, including at least 8 weekend hours.</p> <p>Type of service to be determined in consultation with Communities.</p>	

The procurement of the collection network must be designed to reflect the expectation of Government that the community has access to the Scheme. Refund point operators could be provided with an opportunity to propose an alternate approach that delivers the outcomes sought through the specified minimum service standards on the level and type of service provided at refund points. DWER would assess and approve any reduction in service proposed, in consultation with the local community. Where no parties express an interest in operating a refund point, the Scheme Coordinator would then be required to provide the minimum service standards specified by Government.

It is strongly suggested that a consultative approach is used to determine what baseline type of service is provided to Aboriginal Communities and Island Communities. WALGA has suggested flexible refund points for these communities, however a refund point could co-exist with existing facilities such as a shop and have full time hours or be a mobile collection option. Opportunities exist to reduce costs through alternate service delivery approaches (further discussed in Section 3.3 of this Submission). The Association suggests that the DWER works with the Department of Communities through the Essential and Municipal Services Upgrade Program to identify and prioritise the Aboriginal Communities included at the commencement of the Scheme, with a progressive implementation of the Scheme in the majority of communities by year 5 of the Scheme. The Roadmap for Regional and Remote Communities² states that there are “*about 274 remote Aboriginal communities in Western Australia, with an estimated total population of 12,000 Aboriginal residents.*”

² Regional Services Reform Unit (2016). Roadmap for Regional and Remote Communities. Available online. <https://regionalservicesreform.wa.gov.au/p/roadmap>.

Recommendation: That the Customer Service Standards define minimum service standards on the level (opening hours and days) and type (full time and flexible) of service provided in:

- **Metropolitan areas:**
 - **Full time:** 35 ordinary hours each week, including at least 8 weekend hours.
 - **Flexible:** 24 ordinary hours each week, including at least 8 weekend hours.
- **Regional Centres**
 - **Full time:** 35 ordinary hours each week, including at least 8 weekend hours.
 - **Flexible:** 24 ordinary hours each week, including at least 8 weekend hours.
- **Remote**
 - **Population of the entire Local Government area >2,500:**
 - **Flexible:** 24 ordinary hours each week, including at least 8 weekend hours.
 - **Population of the entire Local Government area <2,500:**
 - **Flexible:** 16 ordinary hours each 2-week period, including at least 8 weekend hours.
- **Aboriginal Communities:**
 - **Flexible:** 16 ordinary hours each 2-week period, including at least 8 weekend hours.
- **Island Communities.**
 - **Flexible:** 16 ordinary hours each 2-week period, including at least 8 weekend hours.

Recommendation: That the procurement process for the collection network includes the minimum service standard on the level (opening hours and days) and type (full time and flexible) of service.

Recommendation: That refund point operators are provided with an opportunity to propose an alternate approach to the DWER that delivers the outcomes sought through the specified minimum service standards on the minimum level and type of service provided at refund points.

Recommendation: That the DWER assesses and approves any proposed reduction in services, in consultation with the local community.

Recommendation: That the Scheme Coordinator is required to provide the baseline level and type of service specified by Government, where no parties express an interest in operating a refund point.

Recommendation: That a consultative approach used to determine the type of service provided to Aboriginal Communities and Island Communities.

3.3 Approximate Location and Number of Refund Points

The Government has clearly outlined its expectation that the Scheme will deliver services to all West Australians. As the majority of the population resides in the Perth metropolitan region, there is a risk that those in regional and remote areas will not receive equitable access to services. This risk will not be mitigated by the proposed return rate of 85% in the third year of the Scheme. As discussed in Section 3 of this Submission, targets on the overall rate of return, can result in efforts predominately applied to areas that yield large volumes of material and are relatively low cost to service. This issue can be addressed through the use of regional targets on the rate of return.

Western Australia is a large State with a population that is distributed very differently to that of other jurisdictions. Modelling of the Department's preferred approach relies on population data from the Australian Bureau of Statistics Census of Population and Housing 2016 (UCL and SSC) and minimum travel distances for different categories of remoteness. Population centres within close proximity (30km) in regional and remote areas were consolidated when determining threshold population levels. This approach indicates that a minimum of 196 refund points will be provided across Western Australia.

Local Government is pleased to note that the Request for Proposal and the draft Customer Service Standards do not prohibit the establishment of multiple refund points in a specific area. However, Local Governments have expressed concern that the proposed network will not deliver a network of refund points that provides a sufficient level of service to the Western Australian community.

Ensuring Accurate Population Estimates

As the rate of beverage consumption at a regional level is not currently available, the Association accepts that population data can be used as a proxy value to determine access to the Scheme. An accurate estimate of population is essential, as this metric will be used to determine the level and type of service provided, in addition to measures of performance. This includes considerations relating to the areas serviced, the distribution of the population and other factors which increase population, such as tourism.

The Census dataset used by the Department is not designed to provide in-depth information on transient, or dispersed populations, in a geographical sense. As the preferred approach is based on this dataset, remote localities that service large volumes of traffic are not guaranteed a refund point. There are a number of Local Governments that service a population greater than 500 that have not been allocated a refund point, as the approach used by the Department focuses on the population centre – rather than the population of the entire Local Government. Appendix 2 includes feedback from Local Governments directly consulted on the need for a refund point in their area.

The Association recommends that the Department uses additional datasets that captures transient and dispersed populations, to ensure population estimates are as accurate as possible. Population growth must also be factored into the Customer Service Standards, to ensure the number of refund points increases in line with population growth. These datasets include:

- MainRoads: Traffic Map. Available online. <https://trafficmap.mainroads.wa.gov.au/map>
- Tourism WA: Visitor statistics. Available online. https://www.tourism.wa.gov.au/Research-Reports/Latest_Visitor_Facts_and_Figures/Pages/Visitor-Statistics.aspx#/
- Locations and Numbers of Mine Sites: Licenced by Department of Mines, Industry Regulation and Safety and DWER. This information will identify the location, and if waste is managed onsite (landfill licence).

Recommendation: That the DWER examines the following datasets to ensure services are provided to transient and dispersed populations:

- **Population centres**
- **Main Roads**
- **Tourism WA**
- **Location and number of mine sites**
- **Aboriginal Communities.**

Recommendation: That the DWER uses the population of the entire Local Government area to determine eligibility for a refund point.

Ensuring Equitable Access for Western Australia

In designing the Customer Service Standards, the Association considers that alternative approaches will be required in different areas of Western Australia. The dataset used by the Department to model the approximate location and number of refund points means that some communities (and Local Government areas) have not been allocated a refund point. The following suggestions are provided to inform the design of a collection network that provides equitable access to the Western Australian community.

Considerations for reasonable access – Metropolitan

The Association is pleased to note that the feedback received on the Government's survey (2017) has been used to set a minimum travel distance in the Perth metropolitan area. However, it is not clear if the 'from' distance relates to a residential area, place of work / leisure or an alternative location. There are many different locations that could potentially host refund points. For example, retail locations

such as supermarkets, service stations, charity shops. Other locations could potentially include Local Government sites and commercial recyclers.

The Association supports great coverage of the Metropolitan area, as suggested in the Alternative minimum service standard included in the draft Customer Service Standard. The alternative minimum service standard is based on one full time refund point per 15,000 population. Rather than all metropolitan sites operating on a full time basis, it is suggested that the 95 remain permanent sites, with the balance of 31 operating as flexible refund points. This will increase the range of organisations able to operate refund points.

Recommendation: That the greater number of refund points is allocated to the metropolitan area (126 in total), however 95 are Full time and 31 Flexible.

Considerations for reasonable access – Regional Centres

Regional Centres are likely to have a reasonably sized urban centre that needs to be serviced at a similar level to that of the Perth metropolitan region. The methodology that underpins the preferred approach effectively groups multiple population centres in a defined Regional Centre that are a distance of greater than 5km apart. Table 8 of the draft Customer Service Standards lists the town group of Bunbury as including Binningup, Boyanup, Brunswick, Dardanup and Burekup. However, Bunbury also includes the suburbs of Dalyellup (located in the Shire of Capel), Eaton and Bunbury South and East. It is unlikely that 3 full time refund points would effectively service the needs of this area.

If refund points in Regional Centres are intended to service the needs of surrounding Shires, a sufficient level of service must be provided. For example, refund points within the City of Greater Geraldton will also need to provide access to the Shire of Chapman Valley residents. The sites within this region must be accessible at times that will be convenient for residents of both Shires and able to address regional considerations (such as accepting crushed containers).

Recommendation: That a greater number of refund points are allocated to Regional Centres based on the entire population of the region and the additional populations serviced. Further investigation and consultation is required with Regional Centres on this issue.

Considerations for reasonable access – Remote

As discussed in Section 3.2 of this Submission, the level and type of service provided at a flexible refund point is yet to be defined. For regional and remote areas, DWER have proposed that a flexible refund point is provided in towns with a population above 500. In some cases, the location of a refund point was determined after consolidation of population centres within a 30km radius. This has resulted in a number of communities in the Great Southern and Wheatbelt regions not receiving a refund point. The Association proposes that a minimum standard is established where one flexible refund point is provided per Local Government area, where the population centre based approach has not delivered any form of service. There are a variety of locations and community groups that could host refund points in remote areas. For example, at a local community group, the local Parents and Citizens Association, local shop or service station. WALGA has directly engaged with a number of Local Governments that are not currently allocated a refund point to determine if there is a need for a refund point in their area. This information is included in Appendix 2 and demonstrates that there is a strong interest and need of refund points in these areas.

Recommendation: That one flexible refund point is provided per Local Government in regional and remote areas, where the population centre based approach has not delivered any form of service.

Considerations for reasonable access – Aboriginal Communities

The Association suggests that the DWER works with the Department of Communities to identify and prioritise the Aboriginal Communities included at the commencement of the Scheme, with a progressive implementation of the Scheme in the majority of communities by year 5 of the Scheme. It is essential that these communities are provided with access to the Scheme, given the potential for significant social, economic and environmental benefit and to ensure there is equity in the Scheme's

implementation. While this will increase the overall number of refund points, alternative service delivery approaches could be employed that could reduce overall costs. For example, providing mobile collections in partnership with retail outlets, schools, or existing health and social service providers.

One approach could be the prioritisation of the communities which are part of the Essential and Municipal Services Upgrade Program³. These communities are:

- Kimberley - Ardyaloon, Bayulu, Beagle Bay, Bidyadanga, Djarindjin, Lombadina, Mowanjum, Warmun
- Pilbara - Wakathuni, Yandeyarra.

Collectively, these 10 communities comprise more than 20 per cent of the total population of remote Aboriginal communities in Western Australia. Those communities currently listed in the Draft Customer Service Standard are - Warburton, Balgo, Looma, Bidyadanga, Djarindjin – Lombadina and Kalumburu.

As noted in previous Submissions, the Department must consider how the Scheme will operate in areas where cashless welfare cards are being trialled. It would be unfortunate if the Scheme generated perverse outcomes and conflict in communities. Consultation must occur with communities on how funds generated through the Scheme can be used to fund services or infrastructure that are collectively valued by the community.

Recommendation: That the number of Aboriginal Communities provided with a refund point initially, are the same locations as those participating in the Essential and Municipal Services Upgrade Program.

Considerations for reasonable access – Islands

Island locations face considerable challenges in providing waste management services to their communities. Throughout the development of the Scheme, the Association has consistently advocated that refund points are provided in the Shires of Cocos (Keeling) and Christmas Island. It is imperative that these communities are provided with access to the Scheme. The Shires are keen to work with the Government to ensure their communities are serviced by refund points. The Association notes that a variation to the draft Customer Service Standards has resulted in Rottnest Island receiving a flexible refund point, due to its role in the tourism industry.

Recommendation: That the Shires of Cocos (Keeling) and Christmas Island be allocated flexible refund points.

Potential Beverage Consumption

An alternative way to determine the approximate location and number for refund points, is to identify areas with higher rates of beverage consumption. The Australian Business Registry provides an avenue to determine the number and location of businesses where eligible beverages can be purchased:

- Australian Business Register: This dataset can be sorted by sector to identify areas with a large number of retailers that sell beverage containers. Available online.
<https://abr.gov.au/Media-centre/Fact-sheets/ABR-Explorer/>.

Recommendation: That the DWER reviews the Australian Business Register to identify areas where there is a greater concentration of beverage retailers.

³ Government of Western Australia. Essential and Municipal Services Upgrade Program. Available online.
https://regionalservicesreform.wa.gov.au/sites/regionalservicesreform.wa.gov.au/files/Factsheet%20-%20Essential%20and%20Municipal%20Services%20Upgrade%20Program%2020122016_0.pdf.

3.4 Community Engagement

The DWER Request for Proposal contains a requirement that a draft public education and awareness plan is submitted as part of the Proposal. The way in which the Scheme Coordinator engages with the community and other stakeholders to promote use of the Scheme, will be a key factor that influences the uptake of the Scheme and convenience of the collection network. It will also assist with managing expectations during the implementation of the Scheme.

The Association recommends that the Customer Service Standards establishes minimum requirements for messaging, branding and methods of engaging the community. Government oversight/approval is required for these matters. When negotiating with the Preferred Scheme Coordinator, the Department must ensure that the Preferred Scheme Coordinator is committed to collaborating with other stakeholders. In addition to establishing a common 'look and feel' for the Scheme, all promotional activity must reflect the consistent communications approach (as agreed by Material Recovery Facility operators), complement the work of other Product Stewardship Schemes and existing Government initiatives. Promotional material should be made available to other stakeholders such as Local Government in a range of formats, for use in generating awareness of the Scheme.

One of the lessons learnt from the implementation of the NSW Scheme, was that community engagement must occur prior to implementation. Doing so, will reduce the risk of negative publicity resulting from unclear expectations on the level and type of service to be provided. From the feedback received at a number of forums, it is clear that there is unchecked perception amongst Local Government that the Scheme will operate using the return to retail model of the original Western Australian Container Deposit Scheme.

Recommendation: That the draft Customer Service Standards establish minimum requirements for messaging, branding and methods of engaging the community.

Recommendation: That the Department requires the Preferred Scheme Coordinator to collaborate with other stakeholders, to:

- **Maintain consistency with the consistent communications approach**
- **Complement the work of other Product Stewardship Schemes and existing Government initiatives**
- **Ensure promotional material is provided to other stakeholders in a range of formats for use in generating awareness of the Scheme.**

Recommendation: That the Scheme Coordinator undertakes community engagement prior to implementation of the Scheme.

3.5 Measures of Performance

Performance of the Scheme

Negotiations with the Preferred Scheme Coordinator on specific criteria, targets and reporting must ensure that the objectives of the Scheme are measurable. The WALGA Submission on the DWER Western Australia Container Deposit Scheme Discussion Paper (October 2017) provided substantive commentary on this issue.

The Association considers that state wide targets on each class of container material must also be supported by targets on the rate of return in individual regions/districts of Western Australia. A target that covers the entire state will have a detrimental impact on the population residing in regional and remote areas. It is imperative that the Department monitors progress and takes action if inequitable access to the Scheme is demonstrated. The suggested approach for determining regional targets is that, until the beverage industry can supply region specific sales data, average beverage consumption per capita be used.

For community participation, this could be achieved through the establishment of specific criteria, targets and reporting requirements that demonstrate what community benefit has been received. For example, the quantum of funds (refunds and handling fees) provided to community organisations and social enterprises that host refund points and any employment opportunities created.

To ensure that the community receives the best possible access to refund points, the Department must take immediate steps to establish a baseline from which to measure the future performance of the collection network. This data will allow accurate, and widespread, assessment of the current level of litter and how many eligible containers are currently recycled through the Kerbside System. The National Litter Index is one measure of litter, however there are only a limited number of sites and the Index does not assess many sites in the non-metropolitan area.

To ensure the community has a clear understanding of the Targets and Measures of Performance for the Scheme, these matters must be included in the Customer Service Standard.

Recommendation: That the Targets for the Scheme include:

- **State wide return rates for each class of container material**
- **Regional return rates for each class of material**
- **Changes to beverage container volume in the litter stream**
- **Accessibility and geographic coverage to the Scheme**
- **Appropriate sharing of costs associated with the Scheme.**

Recommendation: That the Measures of Performance for the Scheme include:

- **Resource recovery and reduction of recyclable material to landfill: including reporting on local market development options for materials to ensure long term sustainable markets**
- **Community participation and benefit: including reporting on the number of people accessing drop off points proportional to the population of the area and the amount of funding provided to community groups through the Scheme**
- **Jobs created: reporting on jobs created through the implementation of the Scheme**
- **Compliance with the Scheme: reporting any instance of non-compliance and enforcement actions undertaken.**

Recommendation: That baseline data be collected before the Scheme commences to determine current levels of:

- **Litter in the range of different areas which will access the Scheme**
- **Eligible containers in the kerbside system.**

Performance of the Scheme Coordinator

The WALGA Submission on the DWER Container Deposit Scheme Discussion Paper (October 2017) identified support for the responsibilities assigned to the Coordinator in the Discussion Paper and additional responsibilities that are clearly linked to the objectives of the Scheme. The Customer Service Standards should include information on how the Government will manage the performance of the Scheme Coordinator, such as outlining the compliance regime that will be established through the Waste Avoidance and Resource Recovery Amendment (Container Deposit) Bill 2018. The effectiveness of the Scheme Coordinator should be measured against its achievement of the Scheme's objectives, as opposed to pure measures of economic efficiency.

Recommendation: That any assessment of the Scheme Coordinator's performance is linked to its achievement of the Scheme's objectives.

Performance of Refund Points

The most important measure of the Scheme's performance, is the degree to which the overall collection network is utilised. Specifically, the number of containers returned to each refund point. When negotiating with the Preferred Scheme Coordinator on specific criteria, targets and reporting, the Department must ensure that the use of all refund points is reviewed on an ongoing basis. A

transition phase could be used, that allows for operational adjustments to be made at refund points to ensure they align with the objectives of the Scheme.

The procurement process for the establishment of the collection network, could require operators to report on the degree to which their site is utilised, including the number of and time period in which containers are returned (e.g. week day / weekend). Refund points can then be monitored over time to ensure they are utilised. If a refund point is not utilised, operational adjustments could be pursued that ensure:

- Opening hours, days and location of collection sites / events facilitate community access
- An appropriate level and type of advertising is undertaken for each collection site / event
- That the Local Government is provided with sufficient notification of a collection event (for flexible refund points) to promote it to the community.

Recommendation: That the Department sets reporting requirements and targets to monitor the utilisation of refund points in different geographical regions of Western Australia, with respect to the number of containers returned at each refund point.

3.6 Complaints and Review

The Customer Service Standard should also include the review mechanisms and complaints processes for the Scheme. The DWER Consultation Summary Report⁴ provided limited commentary on review mechanisms, however, the Consultation Regulatory Impact Statement indicated that:

“The WARR Act includes a provision for a review every five years. In addition, the Minister can require a review of and/or amend the regulations at any time. This would allow alignment with any multi-jurisdictional review of the scope of eligible containers or the value of the refund. The performance of the scheme coordinator and network will be reviewed on a regular basis through the reporting required of the scheme coordinator, and through regular reviews by the Western Australian CDS’s administrator, DWER.”

This provides some clarity about the review process and could be included in the Standard. From a customer service perspective, it is important that the complaints process for both refund points and the Scheme Coordinator are included. The pathway for complaints about refund points is to the Scheme Coordinator. For complaints about the operations of the Scheme Coordinator the State Government would be the appropriate entity to receive this information.

Recommendation: That the Customer Service Standards outlines the:

- **Review mechanism for the Scheme**
- **Complaints process for the refund points and Scheme Coordinator.**

4. Conclusion

Local Government supports the implementation of a best practice Container Deposit Scheme, that facilitates litter reduction, resource recovery and a reduction of waste to landfill, community participation and benefit, and a more appropriate distribution of the costs associated with container management.

A successful Scheme will deliver a collection network that is accessible, reliable, simple to use and provides an immediate reward. As discussed in Section 3.3 of this Submission, minimum access requirements founded on population centres and distance alone will not facilitate equitable access to the Western Australian community.

The lessons learnt from the implementation of other Australian Product Stewardship Schemes presents a clear case for the establishment of minimum standards. The Customer Service Standards

⁴ DWER (2018). Container Deposit Scheme Consultation Summary Report. Available online https://www.der.wa.gov.au/images/documents/our-work/programs/CDS/CDS_consultation_summary_report_FINAL.PDF.

presents Government with an opportunity to set the minimum standards for the collection network. As such, it is imperative that the Customer Service Standards outlines:

- Operational standards for refund points – clearly identifying community expectations of service and the appearance of refund points
- Level and type of service provided – minimum opening hours must be set for full time and flexible refund points, dependent on their location (Table 2)
- Approximate location and number of refund points – increase the number of refund points in regional and remote areas by at least 36, Aboriginal communities by at least 7, and Island Communities by at least 2 (Table 2)
- Community engagement – minimum requirements for messaging, branding and methods of engaging the community and other stakeholders, prior to the implementation of the Scheme
- Measures of Performance – clear targets that measure the achievement of Scheme objectives against baseline data, including, but not limited to the utilisation of all refund points
- Complaints and Review – identify the review process for the Scheme and the avenues for complaints about refund points and the Scheme Coordinator.

Table 2: Recommended opening hours and number of refund points.

	Metro	Regional Centres*	Remote areas (Population of the entire LG area >2,500)	Remote areas (Population of the entire LG area <2,500)	Aboriginal Communities	Island Communities
Opening hours and days	<p>Full time: 35 ordinary hours each week, including at least 8 weekend hours.</p> <p>Flexible: 24 ordinary hours each week, including at least 8 weekend hours.</p>	<p>Full time: 35 ordinary hours each week, including at least 8 weekend hours.</p> <p>Flexible: 24 ordinary hours each week, including at least 8 weekend hours.</p>	<p>Flexible: 24 ordinary hours each week, including at least 8 weekend hours.</p>	<p>Flexible: 16 ordinary hours each 2-week period, including at least 8 weekend hours.</p>	<p>Flexible: 16 ordinary hours each 2-week period, including at least 8 weekend hours.</p> <p>Type of service to be determined in consultation with Communities.</p>	<p>Flexible: 16 ordinary hours each 2-week period, including at least 8 weekend hours.</p> <p>Type of service to be determined in consultation with Communities.</p>
Number of refund points	<p>Full Time: 95</p> <p>Flexible: 31</p>	<p>Full Time: 16</p> <p>Flexible: 7</p>	Flexible: 43	Flexible: 65	Flexible: initially 10	Flexible: 2

*Further consultation is needed with Regional Centres to determine the increased level of service.

Careful consideration of the drivers that have influenced the accessibility and convenience of other Product Stewardship Schemes, will assist in developing a best practice Scheme. Given the unique characteristics of Western Australia, there is a need to consider additional datasets to that used in other States and Territories to ensure all Western Australians enjoy the benefits of the Scheme.

The ultimate measure of the Scheme’s success will be the rate of return in each region of Western Australia. The experiences gained from the implementation of other Product Stewardship Schemes indicate that a strong driver of a high return rate is the convenience and accessibility of the collection network. To ensure the Scheme achieves a best practice approach, clear performance measures, based on the population of a region must be established.

Appendix 1: Case Study – Great Southern

The current population centre based approach will result in 2 Full Time Fund Points and 6 Flexible Refund Points in the Great Southern region. The population of this region is nearly 60,000 (ABS Census 2016). Figure 1 shows the locations of those points within the region.



Figure 1: Full Time and Flexible Refund Points in the Great Southern (adapted from Figure 2 of the draft Customer Service Standards).

In formulating the draft Customer Service Standards, DWER has used the ABS Census 2016 Urban Centres and Localities dataset. Urban Centres and Localities are defined as:

“An Urban Centre is generally defined as a population cluster of 1,000 or more people. A 'bounded locality' is generally defined as a population cluster of between 200 and 999 people. People living in Urban Centres are classified as urban for statistical purposes while those in 'Bounded Localities' are classified as rural (i.e. non-urban). Each Urban Centre and/or Locality (UC/L) is bounded (i.e. a boundary for it is clearly defined) and comprised of one or more whole Statistical Areas Level 1 (SA1s). UC/Ls are defined for each Census and are current for the date of the Census. The criteria for bounding UC/Ls are based on the Linge methodology.”

Source: <http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/2901.0Chapter23102011#SOS>

The population centre of Albany (including Little Grove) listed in the draft Customer Service Standard is 31,070. The geographic coverage of these areas is shown in Figure 2 and Figure 3. This is compared with the population of the Local Government area for Albany, shown in Figure 4, which shows there is a population of 36,583 people in the Albany area. However, the population of the Great Southern region is nearly 60,000.

2016 Census QuickStats

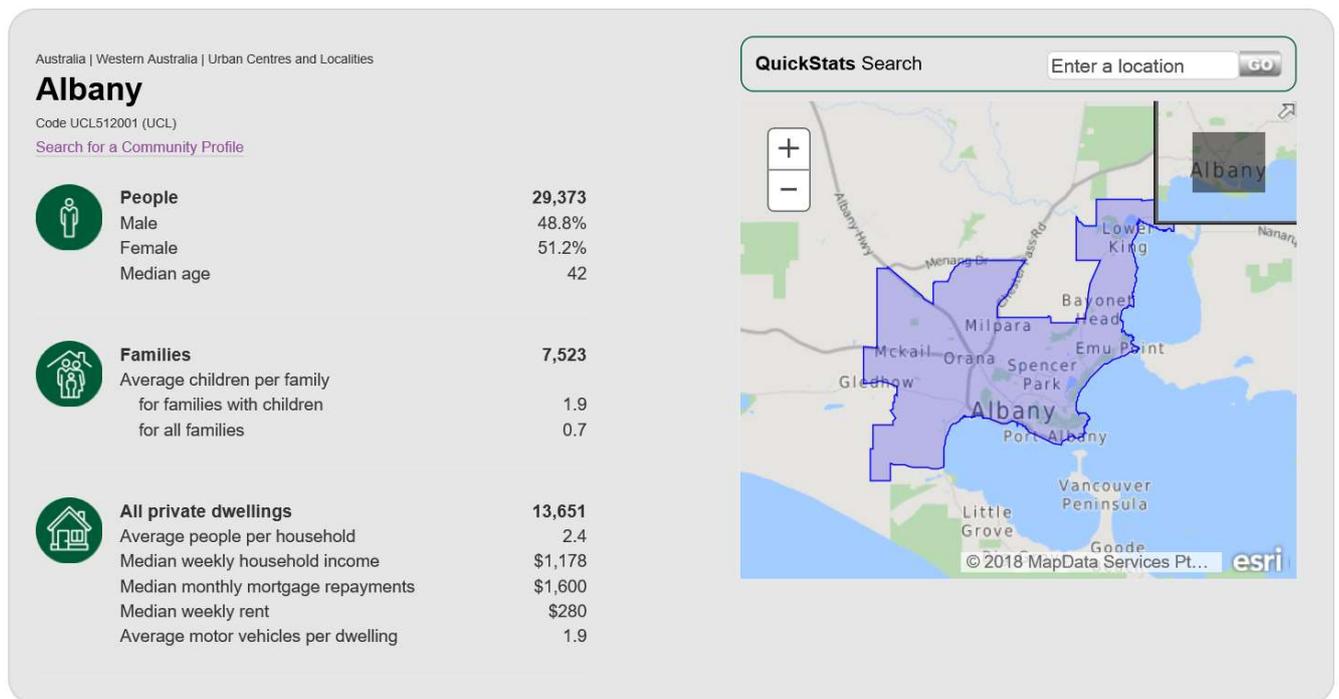


Figure 2: Albany population – Urban Centre and Localities (Source: [ABS](#)).

2016 Census QuickStats

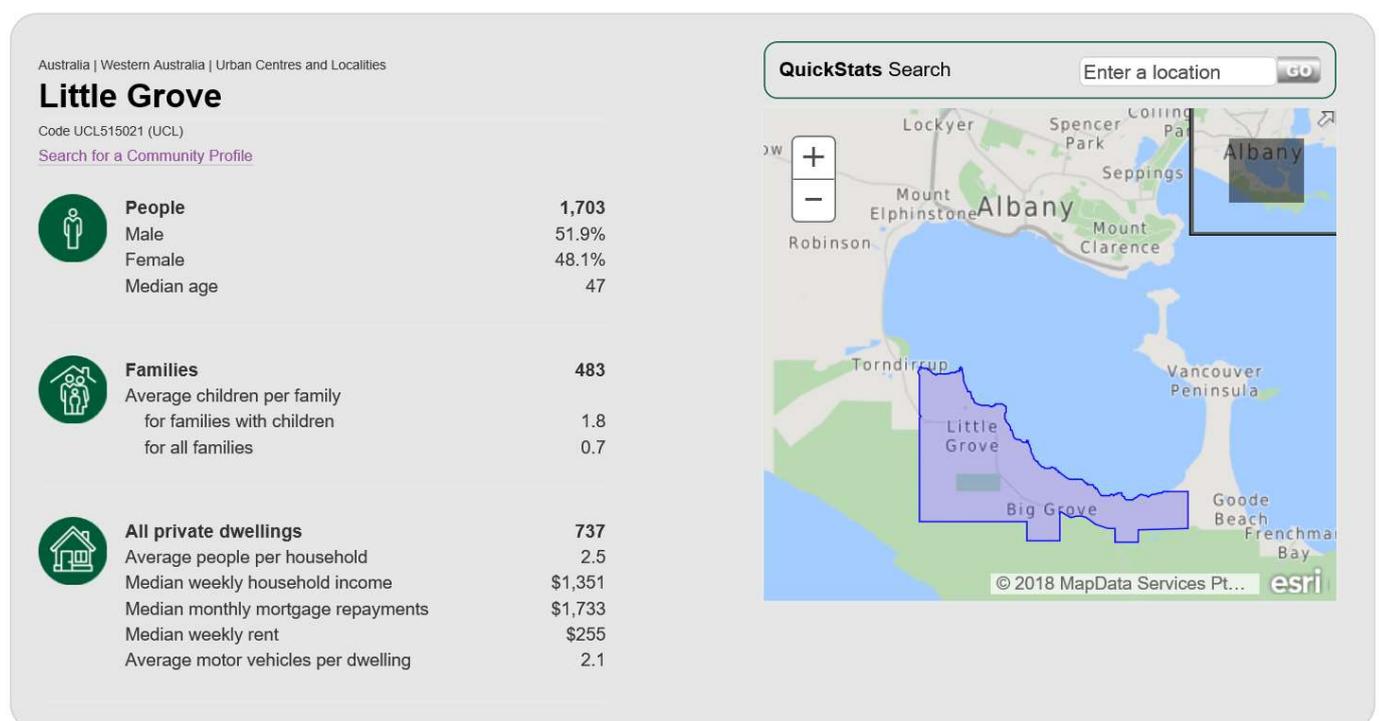


Figure 3: Little Grove population – Urban Centre and Localities (Source: [ABS](#)).

2016 Census QuickStats

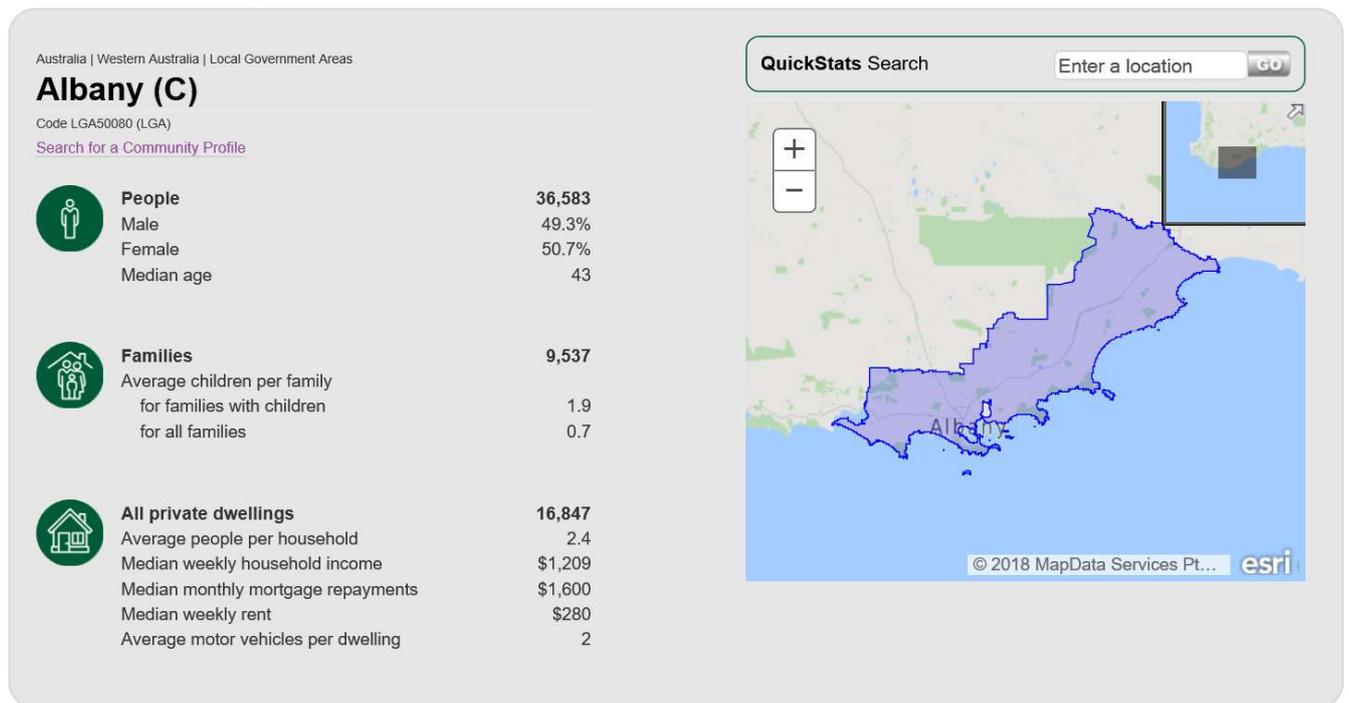


Figure 4: Albany population – Local Government area (Source: [ABS](#)).

Appendix 2: Local Government Refund Points

	Regional Centre
	No refund point in Draft Customer Service Standards
	Metropolitan Local Government

Local Government	CDS Refund Point - Full time (FT) / Flexible (F)	Population of Local Government Area	Comment
Shire of Sandstone		89	<p>Need: Yes, would like a refund point. Feedback from the Shire indicates it should have a refund point. The local pub only serves cans and bottles, nothing is on draft, which increases average beverage container consumption.</p> <p>Location: Potential for the pub to host a refund point, as it is also the local shop.</p> <p>Other Considerations: Additional traffic through the Shire (April – October) at least doubles the population. Mt Magnet is 150km away. It is unlikely that material would be returned there.</p>
Shire of Murchison		153	<p>Need: Yes, would like a refund point. Feedback from the Shire indicates there is no potable water. All water is bottled which increases average beverage container consumption.</p> <p>Location: The Shire leases the road house to a contractor which could be used as a refund point.</p> <p>Other Considerations: The settlement has a road house and caravan park that services tourist traffic for 3 months of the year. A CSIRO site is located within the Shire - SKA (Square Kilometre Array) 80-100km from the town site and will be developed in the next 2 years. Main Roads will start a road upgrade in next year, there will be up to 200 people living at the SKA). An Aboriginal Community is also present within the Shire boundary – Pia Wadjarri.</p>
Shire of Cue		194	<p>Need: Yes, would like a refund point.</p> <p>Location: Potentially a refund point could be provided by the Community Development Employment Project (CDEP) which has a location in town providing employment opportunities for locals.</p> <p>Other Considerations: The Shire has a mining camp in Town with a capacity of 265 people (currently 240). Addition traffic through the Shire (March – September), Caravan Park has up to 100 people.</p>
Shire of Nungarin		257	<p>Need: No need for a refund point. The majority of people drive into Merredin for shopping. Need to ensure that the Merredin site is accessible for those travelling.</p>
Shire of Upper Gascoyne		278	<p>Need: Potential for residents to take containers to Carnarvon. Further consideration needed by the Shire.</p> <p>Other Considerations: Additional traffic due to tourism June – September.</p>

Shire of Westonia		304	<p>Need: Yes, would like a refund point.</p> <p>Location: There is a recycling depot currently located behind the Shire office, this could provide an ideal location and is open 5 days a week. Shire staff could undertake this function.</p> <p>Other Considerations: The Shire has a mining camp in Town with a capacity of 160 people.</p>
Shire of Yalgoo		337	<p>Need: Yes, would like a refund point.</p> <p>Location: Potentially MEEDAC Aboriginal Corporation could provide the refund point. Their site is well located in the Town Centre and presents a good opportunity for community engagement.</p> <p>Other Considerations: Additional traffic through the Shire (April – October) for tourism.</p>
Shire of Trayning		350	<p>Need: Yes, would like a refund point.</p> <p>Location: Potential for local business or community group, such as the Men’s Shed, to host the refund point.</p> <p>Other Considerations: Additional traffic through the Shire in the wildflower season.</p>
Shire of Tammin		402	<p>Need: Yes, would like a refund point.</p> <p>Location: Potential for the CRC facility, Men’s Shed or Lions Club to run the refund point.</p> <p>Other Considerations: Additional traffic through the Shire as it is a Great Eastern Highway location.</p>
Shire of Woodanilling		409	<p>Need: Donation point preference.</p>
Shire of Koorda		414	<p>Need: Yes, would like a refund point.</p> <p>Location: Potential for Men’s Shed, P&C to run facility. Residents are unlikely to take containers to Northam or Merredin (150Km) which is the closest point.</p> <p>Other Considerations: Tourism is increasing in the Shire and there is a Drive-in Cinema.</p>
Shire of Wandering		444	<p>Need: Yes, would like a refund point.</p> <p>Location: Shire could potentially host the refund point at their Transfer Station or the Lions Club could run a site in town.</p> <p>Other Considerations: Minimum of 40km to anywhere else that would be refund point.</p>
Shire of Mingenew		455	<p>Need: Yes, would like a refund point.</p> <p>Location: Potential for community group to run a refund point, 30 community groups in the area. Residents unlikely to drive to Dongara / Morawa which is the closest refund point. Other Considerations: Additional traffic from Tourism through the wildflower season.</p>
Shire of Mount Magnet	1 x F	482	<p>*Adjustment Mount Magnet would provide a service to Cue and Yalgoo.</p>

Shire of Menzies		490	<p>Need: Yes, would like a refund point.</p> <p>Location: Local Government has post office/business centre/ refund point - logical site for the refund point.</p> <p>Other Considerations: Additional traffic from tourism March - November increases the population of Shire. Approximately 8,000 people travel through the town. Town previously hosted a Rodeo which attracted 2,500 people, unfortunately nothing was recycled.</p>
Shire of Wyalkatchem		516	<p>Need: Yes, would like a refund point.</p> <p>Location: This could be a mobile collection point provided at the Regional Level through local community groups.</p> <p>Other Considerations: Additional traffic from tourism in the peak wildflower season.</p>
Shire of Mount Marshall		527	<p>Need: Yes, would like a refund point.</p> <p>Location: The Council has resolved that it would host a regional refund point. Currently there is not a refund point allocated, within 100km, unless refund points are in town it is not going to work.</p> <p>Other Considerations: Additional traffic from tourism during the wildflower season, particularly in Beacon. Bencubbin is the central point for the area. There are additional people in the area who are workers e.g. Brookfield Rail.</p>
Shire of Carnamah		548	<p>Need: Yes, would like a refund point.</p> <p>Location: Potentially the Lions club could run the refund point as it is already collecting some containers.</p> <p>Other Considerations: Seasonal employment within the Shire at Harvest time, (approx 50-60 people) during period October – January.</p>
Shire of Mukinbudin		555	<p>Need: Yes, would like a refund point.</p> <p>Location: Potentially could be run by the Men’s Shed.</p> <p>Other Considerations: Additional traffic from tourism as the Shire is part of the Wheatbelt Way. The Caravan Park in the Shire is very busy and the Shire has a new pool which attracts visitors.</p>
Shire of Kent		559	<p>Need: Yes, would like a refund point.</p> <p>Location: The Progress Association or other community groups could potentially host the refund location.</p>
Shire of Three Springs		594	<p>Need: Yes, would like a refund point.</p> <p>Location: The P&C or Community Action Group could potentially host the refund point.</p> <p>Other Considerations: Additional traffic from tourism during the wildflower season.</p>
Shire of Perenjori		617	<p>Need: Yes, would like a refund point.</p> <p>Location: Potentially sport club could host the refund point.</p> <p>Other Considerations: Additional traffic from tourism during the wildflower season.</p>

Shire of Dumbleyung		671	<p>Need: Yes, would like a refund point.</p> <p>Location: There is strong community interest in recycling, including a community group running the drumMUSTER Program. This group could potentially host refund points.</p> <p>Other Considerations: The population of the Shire is increasing and there are a range of economic development plans in place, including to increase tourism.</p>
Shire of Dowerin		690	<p>Need: Yes, would like a refund point.</p> <p>Location: Shire potentially could host the refund point however opportunities for APEX Club and School. The Dowerin Work Camp could be engaged to undertake the refund point work with funds generated allocated to community projects.</p> <p>Other Considerations: Tourism is significant with the Dowerin Field Day attracting 25,000 people to the Shire. There is also general tourism as the Shire is located on the Wheatbelt Way and Pioneers Pathway.</p>
Shire of Wickepin		718	<p>Need: Yes, would like a refund point.</p> <p>Location: CRC's to run the refund point.</p> <p>Other Considerations: There is a mine planned which may increase the population of the Shire.</p>
Shire of Wiluna		742	<p>Need: Yes, would like a refund point.</p> <p>Location: The local shop would be an ideal refund point and this would assist the Shire ensuring the shop is more viable to operate.</p> <p>Other Considerations: Tourism is present in the Shire, with the Gun Barrel Hwy, Canning Stock route key self-drive locations. Mining is increasing in the area which will boost the population to over 1000.</p>
Shire of Morawa	1 x F	750	
Shire of Kulin		765	No comment
Shire of Dundas	1 x F (& Norseman)	772	
Shire of Narembeen		809	<p>Need: Yes, would like a refund point.</p> <p>Location: The Shire Transfer Station is staffed and could be a refund point. A number of community groups are currently recycling. The Men's Shed are already collecting cans, Lions Club are collecting newspapers and glass.</p> <p>Other Considerations: A mining development is about to commence. There will be a 200 person mining camp mid next year.</p>
Shire of West Arthur		809	<p>Need: Yes, would like a refund point.</p> <p>Location: The Shire has a location for recycling already and could work with the Men's Shed / P&C to deliver a refund point.</p> <p>Other Considerations: It will be important for the transport and logistics costs to be covered.</p>
Shire of Cuballing		863	<p>Need: Yes, would like a refund point.</p> <p>Location: The Shire is interested in providing the refund point there are currently two waste sites which include drumMUSTER which could be used.</p>

			<p>Need: Yes, would like a refund point.</p> <p>Location: Potential for community group to involved, such as Lions Club or Men's Shed.</p> <p>Other Considerations: The Shire hosts a mining camp with 300 people and has significant tourism for Wave Rock with 160,000 visit per year.</p>
Shire of Kondinin		873	
Shire of Victoria Plains		910	No comment
Shire of Bruce Rock	1 x F	930	
Shire of Shark Bay	1 x Denham	946	
Shire of Brookton	1 x F	975	
			<p>Need: Yes, would like a refund point.</p> <p>Location: There is potential for community groups to provide the refund point.</p> <p>Other Considerations: The Shire has considerable tourism and traffic (for example the Williams Woolshed). Development is occurring and population is on an upwards trend. Proposal for new service station & new supermarket.</p>
Shire of Williams		981	
Shire of Quairading	1 x F	1019	
Shire of Goomalling	1 x F	1033	
			<p>Need: Yes, would like a refund point.</p> <p>Location: The Shire is very interested, there are several separate town sites. The Shire would need at least two refund points, one on the coast and one inland. The Men's Sheds could host the refund point for the coastal area and the CRC's are an option. The Greenhead Men's Shed has a large shed.</p> <p>Other Considerations: This region has considerable tourism during the fishing season, long weekends and school holidays. The Towns of Greenhead and Leeman double in size for these times of year. In Greenhead 53% of houses are holiday homes, many listed on Airbnb.</p>
Shire of Coorow		1036	
Shire of Meekatharra	1 x F	1067	
Shire of Cranbrook		1089	No Comment
Shire of Jerramungup	1 x F (Bremer Bay)	1109	
Shire of Broomehill-Tambellup		1144	No Comment
Shire of Corrigin	1 x F	1146	
Shire of Pingelly	1 x F	1146	
Shire of Laverton	1 x F	1153	
Shire of Yilgarn	1 x F (Southern Cross)	1202	
Shire of Gnowangerup	1 x F	1215	
Shire of Kellerberrin	1 x F	1224	
Shire of Lake Grace	1 x F	1268	
Shire of Nannup	1 x F	1328	
Shire of Wongan-Ballidu	1 x F (Wongan Hills)	1331	
Shire of Leonora	1 x F	1411	

Shire of Chapman Valley		1422	Need: No need for a refund point. Feedback from the Shire indicates there is a need to ensure that the Geraldton and Northampton sites are accessible to residents from the Shire.
Shire of Dalwallinu	1 x F	1429	
Shire of Cunderdin	1 x F	1457	
Shire of Ngaanyatjaraku	2 x F (Ngaanyatjarra - Giles & Warburton)	1606	
Shire of Peppermint Grove		1636	
Shire of Boyup Brook	1 x F	1701	
Shire of Ravensthorpe	1 x F (Hopetoun)	1733	
Shire of Beverley	1 x F	1745	
Shire of Boddington	1 x F (Boddington- Ranford)	1844	
Shire of Wagin	1 x F	1852	
Shire of Kojonup	1 x F	1985	
Shire of Moora	1 x F	2428	
Shire of Exmouth	2 x F (Coral Bay & Exmouth)	2728	
Shire of Dandaragan	2 x F (Cervantes & Jurien Bay)	3213	
Shire of Halls Creek	2 x F (Balgo & Halls Creek)	3269	
Shire of Northampton	2 x F (Kalbarri & Northampton)	3319	
Shire of Merredin	1 x F	3350	
Shire of Irwin	1 x F (Port Denison - Dongara)	3569	
Shire of York	1 x F	3606	
Shire of Coolgardie	2 x F (Coolgardie & Kambalda West)	3610	
Shire of Waroona	1 x F	4148	
Shire of Katanning	1 x F	4151	
Shire of Toodyay	1 x F	4439	
Shire of Bridgetown- Greenbushes	1 x F	4660	
Shire of Plantagenet	1 x F (Mt Barker)	5079	
Shire of Narrogin	1 x F	5162	
Shire of Gingin	3 x F (Gabbadah, Lancelin & Gingin)	5217	
Shire of Chittering	1 x F (Muchea)	5472	
Shire of Carnarvon	1 x F	5528	
Shire of Denmark	1 x F	5845	
Shire of Donnybrook- Balingup	1 x F (Donnybrook)	5870	

Shire of Wyndham-East Kimberley	3 x F (Kalumburu, Kununurra & Wyndham)	7148	
Town of East Fremantle		7376	
Town of Cottesloe		7597	
Shire of Derby-West Kimberley	3 x F (Derby, Fitzroy Crossing & Looma)	7730	
Town of Mosman Park		8757	
Shire of Collie	1 x F	8798	
Shire of Manjimup	2 x F (Manjimup & Pemberton)	9250	
Town of Claremont		10054	
Shire of East Pilbara	2 x F (Newman & Telfer)	10591	
Shire of Northam	2 x F (Northam & Wundowie)	11112	
Shire of Ashburton	4 x F (Tom Price, Paraburdoo, Pannawonica & Onslow)	13026	
Shire of Dardanup	Included in Bunbury Figures	14033	
Shire of Esperance	1 x FT, 1 x F	14236	
Shire of Augusta-Margaret River	1 x FT, 2 x F (Augusta & Cowaramup)	14258	
Town of Port Hedland	1 x FT	14469	
Town of Bassendean		15092	
Shire of Broome	1 x FT, 2 x F (Bidyadanga & Djarindjin – Lombadina)	16222	
Shire of Murray	1 x F (Pinjarra)	16698	
Shire of Capel	1 x F	17123	
City of Subiaco		19359	
City of Karratha	1 x FT, 1 x F (Wickham)	21473	
City of Perth		21797	
Shire of Harvey	1 x F	26553	
Town of Cambridge		26783	
Shire of Serpentine-Jarrahdale	1 x F (Serpentine)	26833	
City of Fremantle		28893	
City of Kalgoorlie-Boulder	2 x FT	30059	
City of Bunbury	3 x FT	31919	
City of Vincent		33693	
Town of Victoria Park		34990	
City of Albany	2 x FT	36583	
City of Busselton	2 x FT, 1 x F (Dunsborough)	36686	

Shire of Mundaring		38157	
City of Greater Geraldton	2 x FT	38634	
City of Kwinana		38918	
City of Belmont		39682	
City of South Perth		41989	
City of Kalamunda		57449	
City of Bayswater		64677	
City of Armadale		79602	
City of Mandurah		80813	
City of Canning		90184	
City of Melville		98083	
City of Cockburn		104473	
City of Gosnells		118073	
City of Rockingham		125114	
City of Swan		133851	
City of Joondalup		154445	
City of Wanneroo		188212	
City of Stirling		210208	
Shire of Christmas Island			No Comment
Shire of Cocos (Keeling) Islands			No Comment