



14 May 2013

Our Ref: 05-039-04-0001RNB:HS

Ms Jennie Anderton
Program Manager / Keep Australia Beautiful WA
Department of Environment and Conservation
Locked Bag 104
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Dear Jennie

Development of the Keep Australia Beautiful WA Litter Strategy 2014-19

Due to the timeline for consultation the following comments have not been formally endorsed by MWAC, but are based on a discussion with Local Government officers at a recent Officers Advisory Group meeting. MWAC looks forward to engaging more fully in the formal consultation process for the Draft Litter Strategy 2014-19.

In discussing the survey released by KABWA, officers requested that the following operational issues experienced in managing litter and illegal dumping be provided to KABWA:

Need for a 'multi-pronged' approach

Littering and illegal dumping is a problem for all Local Governments, and occurs at a variety of locations. Managing this problem comes at a significant cost to Local Governments. As KABWA is effectively the statutory authority tasked with the strategic oversight of addressing this problem, Local Government officers have suggested that KABWA employs a multi-pronged approach that encompasses infrastructure provision, public education, enforcement and incentives.

Generational change

KABWA would be well aware that a key element in addressing litter and illegal dumping is changing the attitudes of those that carry out these activities. Local Government officers have highlighted that substantial resources are required over a sustained period of time in the areas of infrastructure, education, enforcement and incentives in order for there to be lasting attitudinal changes.

Resources

Local Governments currently have limited resources available to address litter and illegal dumping. This is particularly the case in the non-metropolitan area. Should KABWA identify that Local Governments need to take a greater role in managing litter, additional resources from the Government will be required.

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Legislative Challenges

Local Governments have reported experiencing legislative challenges in addressing litter and illegal dumping. An example includes the level of evidence required to successfully prosecute an offender under the *Environmental Protection Act 1986*. There have also been legislative challenges for Local Governments wishing to use surveillance cameras to address littering 'hotspots'. For surveillance to be used, signage is required that warns people they are under surveillance. Further to this, we have received feedback that imitation cameras cannot be used, as footage needs to be available in the event it is requested.

Extended Producer Responsibility

MWAC is highly supportive of the concept of Extended Producer Responsibility (EPR). One example which has the potential to significantly reduce litter, is a Cash for Containers Scheme. Such a Scheme provides consumers with a financial incentive to recycle used beverage containers.

In late 2012, a survey of Local Governments was carried out to ascertain the types of products that should be considered for an EPR Scheme. The findings of this survey indicate that tyres, electronic waste, beverage containers, mattresses, and household hazardous waste were appropriate products for an EPR Scheme. These findings have been used to influence the Federal Governments development of the Priority Products list (to be released June 2013). KABWA would be aware that the Standing Council of Environment and Water has recently included end-of-life handheld batteries and waste paint in their work plan for the coming year.

For further information, please contact me on 9213 2063 or email rbrown@walga.asn.au.

Yours sincerely



Rebecca Brown
MWAC Executive Officer