

WALGA

Western Australian Local Government Association

SUBMISSION

Green Building Council Australia

**Construction & Demolition Waste
Management in Green Star
Discussion Paper**

PREPARED BY THE



MUNICIPAL WASTE ADVISORY COUNCIL

"Getting the Environment Right"

December 2012

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.

This Submission was endorsed by MWAC, on Wednesday, 19 December 2012.

The Municipal Waste Advisory Council's member organisations are:

Bunbury Harvey Regional Council
Eastern Metropolitan Regional Council
City of Greater Geraldton
Mid West Regional Council
Mindarie Regional Council
Rivers Regional Council
Southern Metropolitan Regional Council
Western Australian Local Government Association
Western Metropolitan Regional Council

1 Introduction

The Western Australian Local Government Association (WALGA) appreciates the opportunity to comment on the Construction & Demolition Waste Management in Green Star Discussion Paper (Discussion Paper). WALGA welcomes the initiative demonstrated by the Green Building Council Australia (GBCA), in addressing an area of building construction that historically has not received a great deal of attention and strongly supports the inclusion of C&D recycling as part of the rating system. This inclusion provides incentives to change industry behaviour, reduce the production of C&D waste at source and recycle that waste which is generated.

WALGA is commenting on behalf of Western Australian Local Governments, in their dual roles as waste management service providers and potential users of the Green Star system.

2 Role of Local Government

Under the Western Australian Waste Avoidance and Resource Recovery Act 2007, Local Government is responsible for managing Local Government waste (this includes household waste and waste generated by Local Government operations). Practically however, Local Government plays a key role in managing a variety of different waste streams throughout the State. This is particularly the case in the non-metropolitan area, where Local Government is frequently the main service provider.

There is a strong historical expectation from the community, as well as State and Federal Government, that managing waste is Local Governments role, regardless of legislative responsibility, capacity, and external market factors/conditions. Local Government operates landfills, provides waste and recycling kerbside collection and processing services, transfer stations, community education programmes and recycling drop off facilities. Local Government has a role in managing litter and illegal dumping.

According to the 2010/11 Local Government Waste and Recycling Census (DEC 2012), the State wide cost to Local Government in providing domestic waste and recycling services was about \$211 million. Local Governments in the metropolitan area reported spending \$159 million on domestic waste and recycling services.

3 General comments

WALGA understands that the total points currently available under the current Green Star Office V3 AsBuilt system for managing waste during the build time is 3 unweighted points (excluding points for innovative approaches). WALGA supports an increased emphasis on the waste in the Green Star rating system. For example this could be achieved by:

- Increasing the points available under the waste management section;
- Taking waste out of the current *management* and *material* (e.g. *building reuse, steel, design for disassembly*) categories, and creating an entirely new category titled *waste management*; and
- Increasing the weighting factor applied to waste management.

The aim of the revised credit is to encourage waste processing facilities and waste contractors to increase the transparency of their reporting practices, and to invest in operational practices and technologies that increase C&D waste diversion from landfill. The apparent flexibility to achieve this reduction in waste to landfill is supported and encouraged by Local Government.

Justification for action

A significant justification for taking action to increase the emphasis of waste in the Green Star system can be seen in Figure 1 (Hyder, 2012). This clearly shows the amount of waste generated on a per capita basis, and the final destination for waste generated during the 2008-09 period. It is especially interesting to note, that Construction and Demolition waste takes up quite a large proportion of waste to landfill. In Western Australia, the amount of C&D waste currently going to landfill is in the order of 71% (Hyder, 2012).

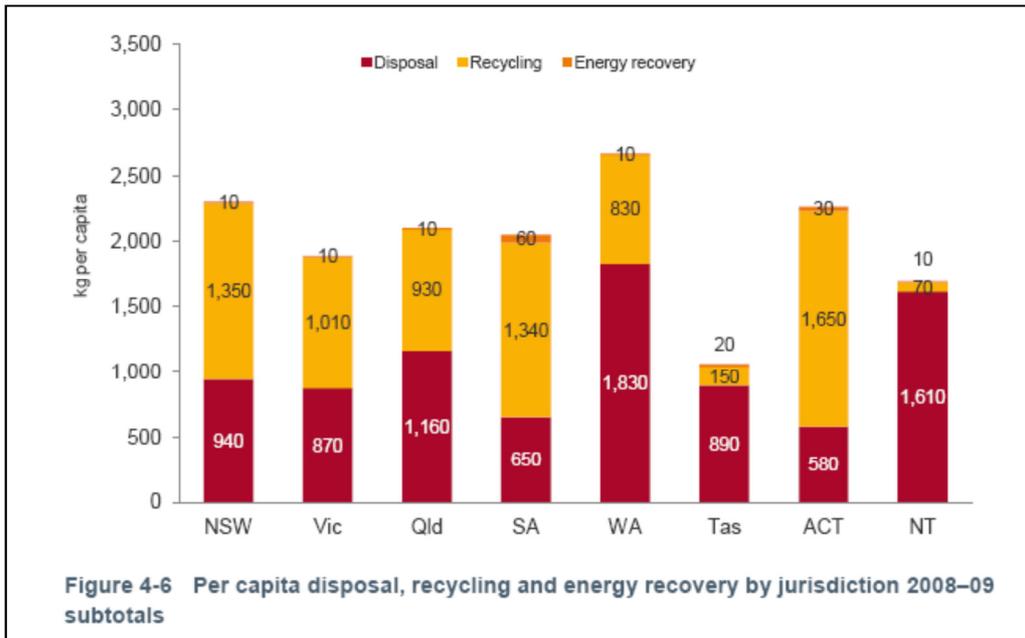


Figure 1: Waste Generation per capita (Hyder, 2012).

Definitions

WALGA suggests that the definitions specifically refer to the relevant sections of the document that provide more detailed information. This would be particularly beneficial in relation to the requirements for a Suitable Qualified Auditor (as detailed on page 36), and the approach to waste to energy (page 32). WALGA also suggests that the Waste Management Hierarchy is included as a separate definition, as it is the approach widely accepted by the waste industry and general community.

In order to reduce potential confusion on roles and responsibilities, WALGA suggests that the title of *Waste Contractor* be amended to *Waste Contractors (transport and handlers)*. This amendment would be in line with the reference on page 12.

Need for practical and applicable measures

In relation to the proposed measures, WALGA questions the practicality of some of the approaches suggested. It also seems that these measures focus on what could be achievable in the metropolitan area. For example, the Paper refers to a requirement that a “waste processing facility must have at least one weighbridge to quantify and provide an auditable trail for weights of inbound waste as well as weights of outbound recyclables and residuals. If the waste processing facility is located on the same site as a landfill than it must have separate weighbridge receipts.” It should be noted that the majority of non-metropolitan waste processing facilities do not have weighbridges, and furthermore are not always manned, as the quantities of waste do not justify these measures. Building projects in these areas that wish to undertake the Green Star process would not be able to gain the waste points currently on offer. WALGA is of the view that providing advice on the type of type of weighbridge and sensitivity required is too prescriptive for this document (page 25). WALGA requests a more flexible approach that allows for volumetric analysis in the event that a weighbridge is unavailable.

Outcomes based approach

WALGA notes the move by the GBCA to allow builders and designers alike the opportunity to create their own waste avoidance strategies, with an outcome of less than 5kg of waste per square metre of fit out area to landfill (page 10).

Additional comment

WALGA was unable to locate the background paper associated with this discussion paper (referenced page 9). It would be beneficial for this document to be made publically available.

4 References

Hyder (2012). Waste and Recycling in Australia 2011, Incorporating a Revised Method for Compiling Waste and Recycling Data.