



**Keep Australia Beautiful WA (KABWA) Draft Litter Prevention Strategy 2014-19
MWAC Submission (February 2014)**

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 February.

Introduction

MWAC appreciates the opportunity to comment on the Draft Litter Prevention Strategy, as Local Government takes an active role in preventing and managing litter across the State.

The Draft Litter Prevention Strategy is divided into three parts; background, action plan, and priority focus. This Submission will address each of these parts, and provide KABWA with a range of additional issues to consider in developing the final Strategy. Comments relating to editorial issues have been provided to KABWA separately.

MWAC supports an approach to addressing littering and illegal dumping which focuses on infrastructure, incentives, education and enforcement. The overall approach suggested by KABWA in the draft Strategy is broadly in line with this, however MWAC considers that more focus needs to be placed on how these different areas will be linked together and who will be responsible for ensuring this linkage occurs. This issue can be resolved by ensuring that the Strategy (and the actions that follow its endorsement), clearly link the identified targets, to the objectives, actions, and key performance indicators.

From discussions with KABWA, MWAC understands that this Strategy is intended to guide the activities of KABWA and is not an official State Government Strategy. Providing clarification on this point could assist KABWA in gaining the support of stakeholders.

Part A: Background

General Comments

The background section contains a number of informative and interesting findings on litter generation in Western Australia. MWAC suggests that the background section is condensed, and structured in such a way that problems identified in the background section can be directly linked to the actions listed in the latter part of the Strategy.

Specific Comments

Section 2: What is littered in WA and where?

There appears to be a heavy reliance on the data from the National Litter Index in the draft Strategy. MWAC is aware of the resource constraints experienced by KABWA, but suggests that more specific/localised information may be required for Western Australia in order to effectively monitor the results of particular activities. For example, a program designed to prevent littering along specific highways, would require specific audit measures to determine if the program was effective. The National Litter Index would not be a reliable measure for this type of program, as the locations of the sites surveyed are not released.

Furthermore, Local Governments have requested that information is provided on the type and amount of illegally dumped materials (e.g. car parts, mattresses, green waste (incl. weeds), shopping trolleys, bicycles etc.). This would be particularly useful, given the observation in the foreword that illegal dumping appears to be increasing across the State.

The following statement is taken directly from section 2: *'only in the remotest and most isolated parts of Western Australia is litter not found.'* Local Governments servicing remote areas have reported that this is far from the case, with evidence of windblown litter in remote locations, particularly islands or coastal regions.

Section 3: Who is responsible for litter prevention in Western Australia?

The roles of KABWA, Local Government and the Police have been clearly identified in the draft Strategy. KABWA should clarify, that only authorised officers of a Local Government can instigate prosecutions. MWAC requests that the roles of other government agencies are also included in the Strategy, as large parts of Western Australia are managed by various State Government agencies. These agencies would be responsible for carrying out litter prevention/mitigation activities on the land they manage.

Throughout the draft Strategy, there is a great deal of commentary on illegal dumping. MWAC considers that it would be useful to include a brief comment in section 3, on the relevant provisions of the *Environmental Protection Act 1986*. Another piece of legislation that would be beneficial to include, is the *Environment Protection (Sea Dumping) Act 1981*.

Section 4: The impact of littering in Western Australia.

The draft Strategy identifies that littering has many and varied impacts in Western Australia. MWAC suggests that KABWA provides references for the information provided, to justify the activities listed in the latter parts of the Strategy. The following quote from the draft Strategy is provided as an example of one point that could be referenced: *‘the presence of litter in a community affects people’s quality of life and wellbeing and is known to decrease property values.’*

Section 5: Who litters and why?

The data used in section 5 to determine which individuals litter (and their reasons for littering), is from 2004. MWAC recommends that more recent information is used to assist KABWA in determining where efforts should be directed at latter points in the Strategy. If more recent data is not readily available, one of the actions listed in the Strategy, could be to update this data.

Section 6: How to stop littering

Greater structural clarity is required for the methods of ‘stopping litter’ that are listed in section 6. This could be achieved, by initially introducing the analogy of a continual feedback loop and then explaining the steps involved in stopping litter. Furthermore, a clear linkage is required between section 6, and other sections of the Strategy (particularly the priority focus areas of Part B).

Part B: A Litter Free Western Australia - Action Plan for 2014-19

General Comments

The draft Strategy states that over the past 5 years, there has been a 27% reduction in the number of items littered, and a 21% reduction in the overall volume of litter. KABWA then suggests a target for this Strategy. MWAC is highly supportive of the inclusion of a target in the next Strategy. The target of a 25% reduction in both the number and volume of littered items (based on present levels), could be further improved by linking to each of the objectives and activities in the Strategy. This would allow KABWA to demonstrate how each objective and activity will contribute to realising the target. MWAC is of the view that the target of a 25% reduction can be shown as obtainable, by relating it to the actual statistics provided in the background section. For example KABWA could identify the current amount of litter and what this would become with a 25% reduction and include a comparison of Western Australia’s level of litter, with other Australian jurisdictions.

Structural Comments

Currently, the objectives, actions, and KPI’s listed in the Action Plan overlap with the actions identified in the Focus Areas. This could cause a considerable degree of confusion for stakeholders wanting to understand what activities KABWA will be undertaking, and make it difficult for KABWA to measure exactly what outcomes it has achieved. Table 1 contains some comments and suggestions on how to make the link clear between actions and KPI’s. The table incorporates the Focus Areas from Part C of the draft Strategy, as these are effectively action orientated statements. MWAC is of the view that restructuring the entire Strategy in this manner will make it easier to use.

Table 1. Suggested Amendments to the Structure and Wording of the Action Plan 2014-19.

Auditing and Evaluation				
Objectives	Actions	Focus Areas – overarching strategies	KPI's	Comment
Ensure that both the NLI and BLS continue for the next five years.	<p>Financially support the National Litter Index and Branded Litter Survey.</p> <p>Develop a litter data template for local government.</p> <p>Research, develop and promote consistent litter auditing and evaluation methodology for program specific litter prevention initiatives.</p>	<p>Planning: Continuing participation in the National Litter Index and using results to determine priorities and programs.</p> <p>Implementing a Community Survey for Western Australia to monitor current attitudes and behaviours to include in the planning process for initiatives and programs.</p> <p>Ensuring evaluation of programs and initiatives to assess their success and ongoing development.</p> <p>Roadside litter: Developing a monitoring and reporting program for roadside litter to assist with evaluation of roadside litter programs and their ongoing operation.</p>	On-going and up to date litter data made available.	<p><i>Objective</i> The objective is currently an action oriented statement, and doesn't encapsulate all of the actions and focus areas. Suggest rewording the objective, so it is based on the broader concept of data collection. For example: Ensure up to date litter collection data is available.</p> <p><i>Actions</i> Local Government is experiencing difficulty in responding to the many requests for information / reporting requirements from State and Federal Governments. Are there any other pre-existing reporting frameworks that could be utilised? To ensure that a 'shared responsibility' is realised, MWAC suggests that KABWA also gives consideration to collecting consistent data from State Government agencies (Main Roads, Department of Parks and Wildlife, Swan River Trust etc).</p> <p><i>Focus Areas / Overarching Strategies</i> These Focus Areas have been taken directly from Section C, in an attempt to simplify the current strategy. MWAC understands the Focus Areas in the draft Strategy are new actions. However, there is a need to integrate both the current and new actions to show how they will contribute to achieving the 25% target in the Strategy. If KABWA employs this suggestion, these Focus Areas will require redrafting. MWAC is of the view it would be beneficial to turn the Focus Areas into Actions, and then assign responsibility for delivery of the Actions to relevant stakeholders. This approach will obviously require a greater level of stakeholder engagement than has been undertaken to date.</p> <p><i>KPI's</i> This KPI is difficult to measure. Also, to whom will the data be made available? Many of the other Actions could also have KPI's attached.</p>

Part C: Priority Focus Areas

General Comments

As stated above, the Priority Focus Areas should be incorporated into the Action Plan of the Strategy, with the Focus Areas turned into Actions and responsibility assigned for the delivery of the Actions. Following this amendment, careful consideration should be given to how the objectives, actions, and KPI's inter-relate. This would remove the current conflict between KPIs and activities.

Additional Comments

Priority

In discussion with Local Government, the level of priority that litter/illegal dumping receives was highlighted. Serious consideration needs to be given to determining the level of priority that should be given to litter prevention and management in Western Australia. Local Government responds to issues relating to littering and illegal dumping on a daily basis and there is an ongoing frustration within Local Government that the issue of littering/illegal dumping is only receiving limited attention and funding from State Government. The Litter Strategy needs to demonstrate a whole of Government approach, as is the case in other states (rather than just a Strategy for KABWA). A whole of Government approach is clearly required, given the impact of litter & illegal dumping on a number of Departments (e.g. Main Roads, Department of Environment Regulation, Department of Parks and Wildlife).

Recommendation: A whole of government approach should be taken to littering and illegal dumping prevention and management.

Alternative Approaches

Local Government has suggested that new, innovative approaches could be applied to litter prevention and management in Western Australia. Currently, litter prevention initiatives do not enjoy a high public profile. An example of one method that could be used to increase public profile is to link behaviour change, directly with enforcement activities. Promoting the use of CCTV at littering hotspots (through signage etc) could be one method of achieving accountability between members of the community. In situations where individual offenders cannot be identified, name and shame campaigns could be used. For example, promote CCTV imagery of offenders, along with a call for information on the identity of the offenders.

Recommendation: KABWA promote the use of innovative approaches to litter prevention and management.

Working in Partnership with Local Government

Throughout the draft Strategy, there is a great deal of commentary on Local Government. MWAC considers that an ongoing partnership between Local Government and KABWA is required for the purpose of preventing and managing litter. This partnership should clearly define the roles, responsibilities, and resources (inclusive of financial incentives) that are available.

Recommendation: MWAC work with KABWA to develop a partnership relating to roles, responsibility and resourcing for litter and illegal dumping.

Data Collection

Local Government has requested the inclusion of problematic litter items such as chewing gum in the National Litter Index, as this sort of litter is expensive to manage. Local Government has also observed that very little data is collected on litter that is not on land, this includes waterways and oceans. Understanding the impacts of litter on these areas would provide some degree of information on the impact of litter in the wider environment. To achieve this, KABWA could investigate the opportunities for partnering with organisations such as Taronga Blue.

Recommendation: KABWA investigate the issue of marine litter and potential organisations to partner with.

Public Place Recycling

The draft Strategy makes mention of the importance of public place infrastructure. Local Government agrees, but considers that the provision of conveniently located infrastructure must occur in conjunction with the rollout of other initiatives such as enforcement and targeted behaviour change programs.