

Submission on the Waste Authority Draft Waste Data Strategy

August 2019



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 Australian 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 Waste Authority will be informed of any changes to this Submission following consideration by the Municipal Waste Advisory Council on 9 October 2019.

Introduction

The Association welcomes the opportunity to comment on the *Waste Data Strategy* (the Data Strategy) prepared by the Waste Authority and Department of Water and Environmental Regulation (DWER). The Association notes the specific actions which will be undertaken by both agencies in relation to waste data, in order to implement the Waste and Resource Recovery Strategy Action Plan 2030 (the Action Plan), and achieve the targets and objectives of the Waste and Resource Recovery Strategy 2030 (the Waste Strategy). Many of the principles and objectives for data collection outlined in the Data Strategy align with those set out in WALGA's *Waste Management Data and Information Management Policy Statement*. The Association is particularly supportive of the initiatives relating to reducing complexity and duplication of data reporting as these issues have been raised in previous submissions to DWER.

Waste Management is a significant activity for Local Government and waste management data is a valuable resource that can inform policy decisions, highlight funding gaps and educate the community about developments in the industry. The availability of quality data that is both reliable and timely is necessary to a transparent system whose performance is visible to all interested stakeholders; it is critical to supporting public confidence in the waste sector and the services it provides.

The Association is generally supportive of the direction set out in the Data Strategy. However would recommend further refinement to some of the proposed actions. Where the Data Strategy proposes further review of individual data elements, the Association would welcome the opportunity to continue working with the Waste Authority and DWER on improvements across these areas.

In this Submission comments have been provided in relation to the strategies and actions specified in the Data Strategy.

Strategy 1.0 Improve, centralise and streamline waste data storage and reporting

The Association supports the strategy to improve, centralise and streamline waste data storage and reporting, and notes the commitment to reduce duplication and simplify reporting requirements via a centralised, online platform for waste data reporting.

Consolidated data reporting provides a consistent reporting system across the State thereby allowing progress to be tracked and an historic record to be developed. This will enable greater scope for more efficient future planning with a greater degree of confidence. The implementation of an online platform and its ongoing success will be underpinned by the establishment of standard reporting methodologies,

in addition to better coordination of existing data collection activities before the commencement of data collection.

Local Government supports the long-term accessibility of waste management data. Legislation dictates the retention, protection and disposal of records produced by government bodies. Further to these requirements, public access to this data should not be affected by changes in policy or government, ensuring that data is protected and accessible in the future. Adoption of an online platform for waste data reporting will inherently permit improved public access to data and other information. Therefore it is vital that waste management data be maintained by a stable central body that will not be affected by funding or program completion dates, or changes in government.

Strategy 2.0 Collect data to monitor WA's waste and recycling performance and enable measurement and reporting against waste strategy targets

In view of the targets outlined in the Waste Strategy, the Association supports the collection of data to monitor and measure the performance of waste and recycling in WA.

Action 2.3 Provide support to local governments, recyclers and landfill operators that are liable entities for data reporting under amendments to the WARR Regulations

Local Government is required by legislation to collect data and report on certain waste streams. In addition to carrying out data collection to fulfil legislative requirements, Local Government also has a number of other reporting requirements that include annual, strategic and monthly reports. Competing demands often means limited consistent/comparable is data collected as a result of staffing constraints and financial outlays. Due to demands on resources, and inconsistent collection methods used across the sector, Local Government recognises the need for support to assist in the collection of existing and new datasets to evaluate progress against Waste Strategy targets. Key questions remain regarding whether support will involve funding and resources to assist waste management data collection, if funding is to be provided, will it be ongoing or one-off and will it come from national, state and/or local levels.

Action 2.7 Collect and report more detailed data about the end point of recyclables

While greater accountability of waste and recyclables shipped overseas will in part be addressed by the Council of Australian Governments (COAG) decision to ban the export of waste plastic, paper, glass, and tyres, the lack of data relating to the end point of recyclables has been raised by the WALGA Zones and remains a matter of concern. The Association would strongly support this action being brought forward, recognising that the collection and reporting of more detailed data applicable to downstream processing of any waste stream would be costly and complex, particularly once waste materials have left highly regulated jurisdictions.

Strategy 3.0 Improve data confidence

The Association supports the actions indicated and the development and implementation of a compliance program for data reporting. It is particularly important that such a program would apply to both licenced and un-licenced waste facilities.

Local Government waste management data is a valuable resource that can inform government decisions and policy, however, there are challenges in collecting, reporting and using this data. Local Government often find the internal and external demands for information difficult due to staffing and financial constraints. There is also concern regarding what data is being asked for in terms of whether the information has already been gathered, and whether to not Local Government is the most appropriate industry to be providing these figures.

The uses and consistency of this data is also of concern. Local Governments currently collect information for various purposes, using different collection and storage methods potentially having major impact on the validity of the data. While a certain degree of error is permissible in data collection, users of the data need to know that the data is sufficiently accurate for their purposes as the reliability of this data will influence decisions made.

Strategy 4.0 Improve availability of waste data for stakeholders

Local Government supports data sharing with stakeholders. However, the protection of an original data source and intellectual property need to be considered prior to the release of any data. Local Government considers it essential that data is published in a timely manner by the State Government to inform decision making and when data is published uncertainty regarding data validity be made clear.

4.2 Use the MyCouncil website to deliver disaggregated local government waste data to stakeholders

The Association considers it is essential that in providing this data any limitations to the data are clearly highlighted and that consultation is undertaken with Local Government in how the data is presented. In the interest of transparency the Association also recommends that Government Department publish their waste generation and recovery rates to clearly identify how the different parts of Government are working to reduce waste generation and increase resource recovery.

4.3 Work with stakeholders to identify additional types and formats of data that they would find useful, and investigate new platforms to deliver waste data to stakeholders

The Association recognises the need to integrate high quality and accurate metadata into data collection as it is important for information retrieval. Data with strong metadata can make it much easier for users to search and access records that meet certain criteria. For example, having the ability to filter through metadata can enable more efficient workflows by allowing a user help to quickly locate specific information in order to comply with regulatory compliance requests.

Strategy 5.0 Collect and manage data for the development and evaluation of policy and programs

Local Government supports the use of waste management data to inform government decisions and policy. In developing new Policy and Programs, and considering data collection, it is important that a clear rationale for the data being collected is provided. For example feedback from Local Governments on the Better Bins Program indicated that data was requested by the Department and it was not clear what the purpose of the data was. Providing a clear rationale for the data requested will build confidence within the sector that the information provided is being used effectively and the effort taken to provide the data is worthwhile.

Strategy 6.0 Improve consistency of waste data terminology and definitions

Consistency of terminology is essential to allow comparison of data from different Local Government areas. Further consideration and consultation will be needed for actions 6.2 and 6.3 relating to revision classification to determine the implications of such changes.

Strategy 7.0 Collect comprehensive and reliable data on food waste

The sector supports initiatives to reduce foodwaste and acknowledges the need for a strong evidence base to achieve this outcome. Such initiatives as the WRAP UK *Love Food Hate Waste* Program use data very effectively to target frequently wasted foods and provide households with solutions. The data required to inform such programs is likely to be sourced from waste audits, which are a costly undertaking. Therefore it is imperative that this type of data collection is fully funded. The Association supports the scope of stakeholders included in this action, as foodwaste is generated by industry as well as households.

Strategy 8.0 Reform of data measurement and management for the application of the waste levy

The action in relation to the Waste Levy are to some degree already underway. The Association is providing input into these reforms.

Strategy 9.0 Manage data for the development and implementation of Local Government Waste Plans

This action is already underway and the Association is providing input into this process through the consultation on the Local Government Waste Plans.

Strategy 10.0 Improve illegal dumping data

WALGA has written to the Waste Authority identifying the need for this type of data to be collected consistently across Local Government and State Government entities. The Association supports

actions to identify the required data, and investigate the potential mechanisms available for improving illegal dumping. In developing an online platform for data reporting in WA, consideration should be given to well established online reporting systems such as the Zero Waste Environmental User System (ZEUS) developed by (then) Zero Waste SA. This web-based system facilitates the monitoring, analysis and reporting on waste reduction targets in South Australia's Waste Strategy. ZEUS allows the electronic capture, storage and reporting of waste and recycling data across the state. Councils can use ZEUS at no cost, with training and support provided free-of-charge by Green Industries SA.

Strategy 11.0 Use data to inform approaches to waste infrastructure

The Association in its Submission on the Draft Waste Strategy supported the development of a State Waste Infrastructure plan and recommended that this action be fast tracked.

Strategy 12.0 Use data to develop and evaluate government procurement policy/programs which avoid waste and increase use of recycled products

The Association supports the Government leadership in relation to sustainable procurement. However recommends that in addition the Government should be collecting and publishing data relating to waste generation by Government Departments. This information will assist in reducing waste generation in different area and ultimately reducing costs to Government.