

Background – Essential Service and Waste Definitions

Waste Management is an essential service, provided by Local Government and a range of private contractors across Western Australia. An essential service is defined as:

“a service formally recognised by government to be a basic right for its citizens and the failure to deliver this service would result in potential risks to the public. Therefore, the government will ensure that this service is considered a priority in strategic planning and is ultimately protected from disruption from outside sources such as natural and man-made disasters, market failure, economic pressures, community complaint and mismanagement” (WALGA, 2020).

To define what waste management encompasses, the most relevant reference is the *Waste Avoidance and Resource Recovery Act 2007* (WARR Act). The terms of particular relevance are the definitions of waste, waste facilities and waste services:

waste includes matter —

- a) whether liquid, solid, gaseous or radioactive and whether useful or useless, which is discharged into the environment; or
- b) prescribed by the regulations to be waste;

waste facility means premises used for the storage, treatment, processing, sorting, recycling or disposal of waste;

waste service means —

- a) the collection, transport, storage, treatment, processing, sorting, recycling or disposal of waste; or
- b) the provision of receptacles for the temporary deposit of waste; or
- c) the provision and management of waste facilities, machinery for the disposal of waste and processes for dealing with waste.

In looking closely at the services that Local Government provides, or provides for, there may be some additional measures that are required. This document outlines current practice and protections and makes suggestions about a common approach to facilities.

Waste Management – COVID Directions

Mandatory Vaccination

Waste management is captured under the [Critical Infrastructure Worker \(Restriction on Access\) Directions](#). Consequently waste management is also captured under the [Booster Vaccinations \(Restrictions on Access\) Directions](#).

The relevant definitions under the Directions are:

47. Waste has the same meaning that it has in the Waste Avoidance and Resource Recovery Act 2007 (WA) and includes controlled waste.
48. Waste infrastructure site means premises used for the predominant purpose of collection, transport, receipt, sorting, treatment, recycling, recovery (including energy recovery),

processing or disposing of domestic or commercial waste and includes licensed or unlicensed waste management premises where one or more waste service is provided.

49. Waste infrastructure worker means:

- a) a person of the kind set out in Row 6, Column 1 of the table in Schedule 1; or
 - b) any other person specified in writing to be a waste infrastructure worker by the Chief Health Officer or any person authorised by Chief Health Officer for that purpose, but does not include:
 - c) a person covered by Row 6, Column 2 of this Schedule.
50. Waste service has the same meaning that it has in section 3 of the Waste Avoidance and Resource Recovery Act 2007 (WA)

Waste Management workers are also identified under the State Governments current definitions of critical workers – which has an impact in a very high case load environment (with a reduction in the requirements for isolation/quarantine).

Preparedness - Local Government Contingency Planning

Collection Contingency

Local Government, working with WALGA Preferred Suppliers, have put in place a Memorandum of Understanding which allows an organisation to utilise fleet and workers from other organisations for waste collection. This provides some contingency in case the workers are affected by the virus. There are some key insurance considerations for Local Governments in this situation:

- Inductions for third party operators of the Local Government vehicles. Ensuring they know how to properly operate the vehicle; that personnel are fit and capable of undertaking the prescribed activity; and ensuring compliance with incident response/reporting procedures.
- Inspection of vehicle pre and post engagement to avoid any disputes over when damaged occurred and whose insurance applies.
- Utilising/following the WALGA Preferred Supplier Arrangement on labour hire. There should be specific protections in there for the member if the labour hire personnel is injured whilst under the supervision of the member.

Business Continuity Planning

Local Governments are already undertaking business continuity plans. In the waste context, it is useful to look at prioritising waste services and deciding what services are most important whilst also considering workforce skills and adaptability.

Priority	Service
1	Kerbside waste/FOGO collection
2	Dead animals/Hazardous waste/Putrid waste
3	Kerbside recycling/GO collection
4	MGB deliveries
5	Park/bus stop bin collection
6	Verge litter collection
7	MGB household repairs
8	Bulk verge collection
9	Illegal dumping not included in (2)
10	Recycling centre drop off

Response

Each Local Government may have a different waste service priority list. The following example from the City of Wanneroo is part of their business continuity planning process and shows what waste services will be impacted, if a certain proportion of the workforce is impacted. Other considerations in relation to workforce include pre-existing health conditions or whether they need to care for people in the home.

Staff Reduction	Impact
10%	None (short term)
20%	None (short term)
30%	Some disruption to verge/illegal dumping. Commence sourcing of temporary staff/contacting other Local Governments
40%	Verge litter/illegal dumping and greens drop-off ceased. Some reduction in bulk waste collection staff (service slow down)
50%	Verge/illegal dumping, greens drop-off and bulk collection ceased. Reduced capacity for park bins, et
60%	Verge litter/illegal dumping, greens drop off, bulk collection, park bins and delivery of MGBs suspended
70%	Verge litter/illegal dumping, greens drop-off, bulk collection, park bins, delivery of MGBs ceased. All available staff (internal and external) to concentrate on kerbside collections.
80%	Verge litter/illegal dumping, greens drop-off, bulk collection, park bins MGB delivery and kerbside recycling collection ceased. Consider a fortnightly waste collection
90%	Major impact on domestic collection

Staged phases of reduced services are included in Appendix 1, noting however the Government has expressed a preference to avoid lock down.

Waste Collection – Kerbside

Contamination of household bins – advice from the Department of Health PHEOC is:

It is possible that someone with COVID-19 may contaminate the surface of a bin and this could lead to transmission onto the next person to touch the bin. The bin is acting as a fomite- i.e., an inanimate object which can spread a pathogen on when touched. The risk of this occurring is no higher than any other object that people may touch throughout the course of their day. Thus, the risk mitigation strategy for this occurrence is to ensure that all staff handling bins wear gloves and wash their hands effectively after handling bins and regularly throughout the course of the day. It may also be an idea for Local Governments to remind consumers to wash their hands regularly throughout the day, including when handling bins.

Collection Vehicles – a large proportion of waste collection vehicles, for kerbside collections, are side arm trucks. This means that a person does not physically touch the bin, instead the side arm of the truck collects the bin. The contents of the bin are tipped into the sealed body of the truck. This system is set up to minimise any contact between the driver and the bin or its contents, thereby minimising risk. It is recommended that workers keep the same truck where possible, or the truck is sanitised between uses.

For those organisations using rear lift trucks, where workers are required to manoeuvre bins to be picked up by the trucks, it is recommended that the workers follow the Department of Health advice regarding hygiene. The Local Government may also want to encourage

residents to wash their hands after handling bins. For workers sharing vehicles – it is suggested that waste collection vehicles are thoroughly sanitised between shifts.

Collection / Processing Contracts - Local Governments who have outsourced collection may need to consider some flexibility in their contracts, should the workforce undertaking collections be severely impacted. For example, the collection time (earlier or later) and the destination of the material. In regard to destination, it may be quicker for a vehicle to go to another landfill / transfer station than the one contracted. The main message is, consider this as an option and Local Government discuss this with your contractors.

Waste Facilities **Sharing vehicles**

As for collection workers, it is suggested that vehicles are thoroughly sanitised between shifts/users. This can include forklifts, front end loaders and compactors.

Material Recovery Facilities

The workers at these facilities wear full PPE – masks, glasses and gloves – as the nature and condition of the material received at these facilities is also quite variable and Material Recovery Facilities do have issues with the type of material they receive at times (for example nappies and sharps). Rapid Antigen Testing could form a key part of ensuring that exposure of workforce is limited.

Composting facilities

At composting facilities, for example processing FOGO, workers would wear full PPE, practice good hygiene and utilise litter pick grabs to remove all contamination. That means tissues can continue to be disposed of in the FOGO bin. Rapid Antigen Testing could form a key part of ensuring that exposure of workforce is limited.

Transfer Stations/Drop off centres/Landfills

The current approach used by these facilities is to minimise staff contact with the community who are dropping off recyclables or waste. This includes social distancing processes and additional PPE where appropriate. Currently, these sites are still open and taking 'self-haul' material. Disposing of waste is necessary and people may be taking the opportunity, while self-isolating, to have a good clear out. While transfer stations/drop off centres and landfills can remain open to allow people to dispose of self-haul material – while minimising staff exposure – it is encouraged that this occur, rather than the material remaining in people's homes or being illegally disposed of. However, if Government was to put in place more stringent recommendations regarding people not leaving their homes – except to get essentials – then it is suggested that transfer stations/drop off centres / landfills close their self-haul facilities. In this case the community would be encouraged to store material at home until such time as the restrictions were lifted.

Where the community has a clear pathway to dispose of the waste that they are usually generating (through kerbside/verge collection) then the restriction on self-haul should not prove too onerous. If these services are not in place in a Local Government – or are only in place for a proportion of the population – there is a rationale for self-haul to remain in operation, as it is the only waste disposal option for the community. Depending on the size of the community being serviced, arrangements could be put in place for pre-booking of waste drop off and electronic transactions.

Cash handling

It is suggested that sites minimise cash handling from an Occupational Health and Safety point of view. If your Local Government has not yet instituted a 'no cash' policy, then it is suggested

that this be referred to those responsible for dealing with COVID-19 issues within your Local Government and a whole of organisation policy be put in place.

Staffing

Considering options to reduce risks, there could be the option for multiple shifts, with smaller numbers of staff, as a way of social distancing and reducing risk.

Key Community Messages

Through the Associations Consistent Communications Collective, the following key messages for the community were discussed, and there are some resources available to promote these messages:

- Do not place tissues or kitchen paper towels in your recycling bin – these materials are usually considered contamination in the recycling bin but now with concerns about COVID-19 this behaviour is not acceptable. Place used tissues or kitchen paper towels in your general waste bin.
- Rapid Antigen Tests are not recyclable, please place them in your waste bin.
- Takeaway containers – clean and empty plastic containers in the recycling bin. Compostable packaging goes in the general waste bin.
- If there is a 'stay at home Direction' from Government, kerbside and verge collection services will continue. Waste management is an essential service. However, drop off centres – such as transfer stations and landfills – may limit community access during this time (to encourage people to stay home).

Appendix 1

In developing the document, considerations include the need to ensure that the community can dispose of waste generated in an effective and efficient way which minimises the risk of COVID-19 transmission and facilitates adherence to Government Directions. Waste is an essential service, however the specific elements of the waste services which are required at all times needs further discussion. If this consistent approach is to work, there will need to be widespread adoption – or a Government requirement – because if one site is open when others are closed it is likely to be overwhelmed.

Planning for Local Government Services during an Emergency Event

Stage of Emergency	Local Government Waste Services
<p><i>Complete Lock Down / Very High Caseload Environment</i> Significant community transmission and multiple outbreaks across wider geographic area.</p> <p>Restrictions:</p> <ul style="list-style-type: none"> • Limited movement of people between geographic areas (within and outside metropolitan area, including regional travel restrictions) • Severely restricted community movement – shopping, exercise, emergency only • Social distancing/ masks for anyone outside • Work from home, unless absolutely essential • Non-essential businesses close • Take away only from restaurants /café 	<p>Kerbside: Continue as normal</p> <p>Vergeside: Continue as normal, unless concerns about ability of service provider to collect.</p> <p>Drop off Reuse shops closed Public drop off – closed Household Hazardous Waste drop off – closed</p> <p>Note</p> <ul style="list-style-type: none"> • Although closed, there is the potential for it to be open by appointment, for urgent waste disposal. • For some Local Governments drop off is the only waste disposal option for residents (or a portion of residents), for these Local Governments they would need to continue providing a drop off option, with increased precaution for workers (if present at the site). <p>Container Deposit Scheme Bag drop, in certain shops (e.g., charity shops) are likely to be impacted.</p> <p>Communications – community facing Wash hands after you take the bin in /out Reduction of waste messaging Do not put tissues in the recycling bin</p> <p>Worker considerations Waste management services workers need to have permits to cross borders / boundaries. Workers will need to have social distancing and wear masks, ensure that exposure risks are minimised – for example no congregating of workers, same people working together, split shifts etc. to make sure if one section of the workforce falls sick or are required to self-isolate, there are sufficient workers to cover those shifts. PPE and hand sanitiser must be provided to workers.</p>

	<p>Have labour hire company or casual workforce on standby to provide labour if insufficient workers due to sickness and self-isolation requirements.</p> <p>Increase hygiene requirements – frequency of hand washing if not wearing PPE.</p> <p>Cashless system.</p> <p>Workers should be encouraged to self-isolate and get tested if they are feeling unwell. Identify workers who are at high risk of serious illness/death if they contract COVID-19. Seek advice on alternative work arrangements.</p>
<p>Very high case load environment Community transmission, across a range of geographic areas.</p> <p>Restrictions:</p> <ul style="list-style-type: none"> • Limited movement of people between geographic areas (within and outside metropolitan area, including regional travel restrictions) • Social distancing in public spaces • Gatherings allowed • Work from home if you can • Non-essential businesses close • Take away only from restaurants /cafés 	<p>Kerbside – Continue as normal</p> <p>Vergeside – Continue as normal, unless concerns about ability of service provider.</p> <p>Drop off Reuse shops closed Public drop off – open Household Hazardous Waste drop off – open</p> <p>Container Deposit Scheme Bag drop, in certain shops (e.g. charity shops) are likely to be impacted.</p> <p>Communications – community facing Wash hands after you take the bin in /out Reduction of waste messaging Do not put tissues in the recycling bin</p> <p>Worker considerations Waste management services workers need to have permits to cross borders / boundaries. Workers will need to have social distancing and wear masks, ensure that exposure risks are minimised – for example no congregating of workers, same people working together, split shifts etc. to make sure if one section of the workforce falls sick or are required to self-isolate, there are sufficient workers to cover those shifts. PPE and hand sanitiser must be provided to workers. Have labour hire company or casual workforce on standby to provide labour if insufficient workers due to sickness and self-isolation requirements. Increase hygiene requirements – frequency of hand washing if not wearing PPE. Cashless system. Workers should be encouraged to self-isolate and get tested if they are feeling unwell. Identify workers who are at high risk of serious illness/death if they contract COVID-19. Seek advice on alternative work arrangements.</p>

<p>High case load environment Some community transmission</p> <p>Restrictions:</p> <ul style="list-style-type: none"> • 1.5 square metre social distancing • Travel restrictions relaxed across majority of WA • Gatherings allowed • Café & restaurants open – for food only • COVID Safety plans for businesses 	<p>Kerbside – Continue as normal</p> <p>Vergeside – Continue as normal, unless concerns about ability of service provider.</p> <p>Drop off <i>Reuse shops closed</i> Public drop off – open Household Hazardous Waste drop off – open</p> <p>Communications – community facing Wash hands after you take the bin in /out Reduction of waste messaging Do not put tissues in the recycling bin</p> <p>Worker considerations Workers will need to have social distancing and wear masks, ensure that exposure risks are minimised – for example no congregating of workers, same people working together, split shifts etc. to make sure if one section of the workforce falls sick or are required to self-isolate, there are sufficient workers to cover those shifts. PPE and hand sanitiser must be provided to workers. Have labour hire company or casual workforce on standby to provide labour if insufficient workers due to sickness and self-isolation requirements. Increase hygiene requirements – frequency of hand washing if not wearing PPE. Cashless system. Workers should be encouraged to self-isolate and get tested if they are feeling unwell.</p>
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Risk of transmission relating to Waste Services

Services	Risk	Likelihood of occurrence	Mitigation
Kerbside	Transmission of virus from bin to bin, if workers are touching multiple bins during the collection process	Low – feedback from Dept of Health indicated that bin to bin transmission was relatively low likelihood of occurring and straightforward to mitigate	Community messaging – wash hands after taking the bin out.
	People with the virus at home placing items which have the virus on them (e.g., tissues etc) in the waste, recycling, GO or FOGO bin	High – material is likely to be placed in the bin that does carry the virus, however there are a range of mitigation options and current procedures which reduce the risk.	Community messaging – don't put tissues in your recycling bin. Double bag your waste. Operational – No one is touching the material in the bin. Recycling, GO or FOGO sorting workers already wearing full PPE, as nasty stuff frequently in the waste.
Vergeside	People going through the piles of waste on the verge, which may have the virus on them	Medium/low – feedback from Dept of Health indicated that transmission was relatively low likelihood of occurring and straightforward to mitigate	Community messaging / enforcement – do not go through the bulk verge collection material.
Drop off	Virus infected waste being in contact with workers – directly or indirectly	Medium – waste could be infected with the virus.	Community messaging – if you have the virus double bag your waste. Operational – PPE for those working closely with waste. Ensure that the filters on vehicles sufficient. Limit the number of cars allowed on site at any one time to allow social distancing – ensure additional staff to undertake traffic control.
All	Worker concern regarding the potential impact of COVID. If an employee contracts COVID at work, the employer could be at risk of receiving a workers' compensation claim.	High – workers are rightly concerned about any potential impact of COVID through exposure in their workplace.	Ensure that workers have the most contemporary health advice from the Department of Health. Ensure workers have relevant PPE and training in how to use the PPE. Check in regularly with workers to understand any concerns or facilitate improvements to how work is being undertaken.