



Submission to the
Western Australian Planning Commission

on the

Outer Metropolitan Perth and Peel/
Central Metropolitan Perth Sub-Regional Strategy

PREPARED BY THE



MUNICIPAL WASTE ADVISORY COUNCIL

"Getting the Environment Right"

December 2010

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). The Municipal Waste Advisory Council is a standing committee of the WA Local Government Association, 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). The Regional Councils members of MWAC include the Eastern Metropolitan Regional Council, Mandarie Regional Council, Southern Metropolitan Regional Council, Rivers Metropolitan Regional Council, Western Metropolitan Regional Council and the City of Geraldton-Greenough. 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.

The Municipal Waste Advisory Council's member organisations are:

Eastern Metropolitan Regional Council
City of Geraldton-Greenough
Mandarie Regional Council
Rivers Regional Council
Southern Metropolitan Regional Council
Western Australian Local Government Association
Western Metropolitan Regional Council

Executive Summary

This Submission consists of the opinions of Local Government in regard to both the Outer Metropolitan Perth and Peel, and the Central Metropolitan Perth Sub-Regional Strategy, as they relate to the planning of waste management infrastructure. Due to the need to raise the profile of waste management services, and the subsequent requirement to provide additional information to the WAPC, MWAC has produced a separate submission to that of WALGA. This Submission, however, should be read in conjunction with the WALGA Submission which will reference wider Local Government concerns with regard to the Draft Strategies.

The absence of consideration of the impact of an increase in population on waste management to the Perth metropolitan and outer Perth and Peel regions is of concern to Local Government. With increasing population and consequent waste generation, waste management needs to be considered early in the planning stage. A lack of understanding will impact on the ability to plan across the region for the siting and upgrading of waste management infrastructure.

That there is a lack of understanding of the significance of waste management services to the community also appears to be reflected in the State Government approvals process for the development of new infrastructure. For some Local Governments in Western Australia, approvals for new sites (for example, transfer stations) have taken up to five years. These delays will impact on how quickly sites can be prepared and may mean significant delays in implementing any landfill site consolidation.

The encroachment of residential developments on buffers around waste treatment facilities (including Alternative Waste Treatment (AWT) facilities and landfills) also means that Local Governments are finding it more difficult to carry out these services. As encroachment increases, so does public concern about these facilities. Without consideration of these concerns in strategic infrastructure planning, the ongoing provision of these basic services is in jeopardy. With the projected growth of the region, residential encroachment appears to be imminent unless adequate planning is undertaken.

MWAC considers that waste management (including collections, and disposal as well as recycling and resource recovery) is an essential service/utility. Landfills as well as resource recovery facilities/operations provide an essential community service that, if discontinued, would result in substantial environmental, social and economic impacts at a local, state and global level. MWAC, therefore, recommends that the term 'landfill and resource recovery facilities/operations' be included along with other essential infrastructure identified in the Sub-Regional Strategies (wastewater treatment and water).

1. Planning for Waste Management

The Municipal Waste Advisory Council (MWAC) appreciates the opportunity to comment on both the Outer Metropolitan Perth and Peel, and the Central Metropolitan Perth Sub-Regional Strategies. The opinions expressed in this Submission apply to both Strategies, and concentrate solely on the issue of planning for waste management throughout Perth and surrounding areas. This Submission should be read in conjunction with the Western Australian Local Government Association (WALGA) Submission.

2006-07 figures indicate that Australians generate 43,777,000 tonnes of waste each year, up 31% from 2002-03 (EPHC 2010, p. 22). The Environment Protection and Heritage Council (EPHC) estimate that, based on these figures, by 2020-21 Australians will generate 81,072,593 tonnes of waste (these projections are based on growth in generation of 4.5 per cent per annum, including the contribution of 1.5 per cent a year population growth) (2010, p. 22). According to the 2006 census, the population of Australia is 19,855,288 people (ABS 2010), which means that waste generation per person is 2.05 tonnes per annum. Based on projections in *Directions 2031* (2.2 million people in Perth) Perth will be generating a total of 4.85 million tonnes of waste each year. In order to adequately collect and dispose of this waste, communities rely on appropriate infrastructure and waste management services, most of which are carried out by Local Governments. The absence of consideration of the impact of an increase in population on waste management to the Perth metropolitan and outer Perth and Peel regions is of concern to Local Government.

Waste management activities contribute a significant service to the community, particularly on public health and environmental grounds. In the past, the responsible collection and disposal of waste in Western Australia was outlined in the *Health Act 1911* due to the potential health risks of waste management in the control of public health. The *Environmental Protection Act 1986* also included provisions for the management of waste in order to 'minimise the generation of waste and its discharge into the environment' (EP Act 1986, p. 20). In 2008, the *Waste Avoidance and Resource Recovery Act* (WARR Act) 2007 was introduced to consolidate existing provisions relating to waste management within one piece of legislation.

The primary objects of the WARR Act (2007, p. 5) are 'to contribute to sustainability, and the protection of human health and the environment' and the move towards a waste free society in Western Australia by –

- (a) *promoting the most efficient use of resources, including resource recovery and waste avoidance;*
and
- (b) *reducing environmental harm, including pollution through waste; and*
- (c) *the consideration of resource management options against the following hierarchy –*
 - (i) *avoidance of unnecessary resource consumption;*
 - (ii) *resource recovery (including reuse, reprocessing, recycling and energy recovery);*
 - (iii) *disposal.*

As outlined in the WARR Act, "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.*

The WARR Act outlines that Local Governments are responsible for the collection of 'local government waste' which means

- (a) waste from residential sources; and*
- (b) any other waste of a kind prescribed by the regulations for the purposes of this paragraph, but does not include sewerage or waste of a kind prescribed by the regulations as excluded for the purposes of this definition.*

The provision of waste management infrastructure is necessary to carry out the objectives of the WARR Act. These necessary facilities include landfills, inert and putrescible transfer stations, recycling plants, material recovery facilities, resource recovery facilities and greenwaste reprocessing facilities which make up an integrated waste disposal and/or processing system. The majority of the infrastructure required to process Municipal Solid Waste (MSW) in WA is coordinated by Local Governments and Regional Councils, which include the Rivers Regional Council, the Mindarie Regional Council, the Eastern Metropolitan Regional Council, the Southern Metropolitan Regional Council and the Western Metropolitan Regional Council.

As identified in the Central Metropolitan Perth Sub-Regional Strategy:

'The key challenge for planning and service infrastructure agencies and utilities will be in improving the way infrastructure projects are currently prioritised and coordinated to ensure their timely provision. These improvements include early engagement with State agencies, public utilities and local government authorities, demand assessments of future growth areas, determining land requirements, assessment of current infrastructure network capacities, collaborating and sharing information and the identification of new funding and delivery models.' (p. 91)

It is the opinion of Local Government that these challenges also apply to waste management infrastructure. It is encouraging to note that the Department of Planning and the WAPC value the early engagement with Local Government, and suggest that this engagement is also extended to Regional Councils in order to gauge the potential impacts on waste management infrastructure. Some areas of State Government are unused to considering waste management in their operations; as waste management has not traditionally been considered within their remit. With increasing population and consequent waste generation, waste management activities need to be considered early in the planning stage. A lack of consideration of these activities will impact on the ability to plan across the Region for the siting and upgrading of waste management infrastructure. One suggestion would be to include waste management in the list of 'essential infrastructure' identified by the WAPC when consulting for future developments.

In the metropolitan area the collection and disposal of household waste is managed by Local Governments and Regional Councils. The Regional Councils are made up of a number of member Local Governments in their region in order to undertake a regional waste management service. An example of these services includes the development of Alternative Waste Treatment (AWT) facilities, which all of the Councils have, or are in the process of developing. The existing facilities treat the organic fraction of household waste (including food/garden waste and paper), and turns it into compost. There is an expectation that the Department of Planning and the WAPC consult with Regional Councils when developing strategic plans for the metropolitan area. Even if Local Governments are consulted on potential developments in the area, it cannot be assumed that they will be aware of all waste-related issues as most of these services are undertaken by Regional Councils.

Appendix 2 of the Draft II Waste Strategy for Western Australia states that 'potential strains on waste infrastructure will become apparent in certain geographic areas over the next 10 years unless there is planning or efforts to boost the recycling rate' (2009a, p. 4). Individual Local Governments and Regional Councils have identified their future priorities in regard to the planning of infrastructure for Municipal Solid Waste (MSW). Without direction from the State Government in regard to strategic planning across the State, Local Government's face many challenges. It is imperative that demand assessments are carried out in order to determine whether or not existing infrastructure will be able to handle the projected increase in waste generation.

Guided by the projections made above in regard to the total waste generation for Perth by 2031, of which it can be assumed that 30 per cent is Municipal Solid Waste (MSW) and 30 per cent is Commercial and Industrial (C&I) waste (i.e. 2.91 million tonnes, of which 730,000 tonnes was processed through AWT with 70 per cent diversion and 50 per cent of the C&I was recycled), there would be a need to dispose of 1,680,000 tonnes of landfill requiring 1,680,000 cubic metres of airspace to be available each year and every year. In addition, if there were 3 major landfills operating in the Perth Metropolitan area, each receiving 500,000 tonnes over a 20 year period, each within the minimum buffer distance of 500 metres, there would be a requirement to have three sites (North, South and East), each with a minimum size of 300 hectares and ideally 700 hectares if a buffer distance of 1,000 metres was to be provided. Please note that this is a modest estimate and does not include the projected 4.5 per cent growth in waste generation per person as anticipated by the Environment Protection and Heritage Council.

What the above figures highlight is that land for waste disposal needs to be planned for now. Without consideration for these facilities, or the land required to site them, State and Local Governments will face a number of challenges in the future.

2. Waste Management Infrastructure Development and Operation

The State Planning approvals process is also of concern to Local Governments. For some Local Governments in Western Australia, approvals for new sites (for example, transfer stations) have taken up to five years. This delay will impact how quickly sites can be prepared and may mean significant delay in implementing any landfill site consolidation. The implementation of AWT facilities can take between five and seven years, and often with contracts for at least 20 years, with a total investment of \$100 million each, which are required to secure the infrastructure. This has the potential to impact on Local Governments looking for alternatives to landfill.

The encroachment of residential developments on buffers around waste treatment facilities (including AWT's and landfills) also means that Local Governments are finding it more difficult to carry out waste management services. As encroachment increases, so does public concern about these facilities. Without consideration of these concerns in strategic infrastructure planning, the ongoing provision of these basic services is in jeopardy. With the projected growth of the region, residential encroachment from existing and future developments appears to be imminent unless adequate planning is undertaken. MWAC, therefore, recommends that the term 'landfill and resource recovery facilities/operations' be included along with other infrastructure identified in the Sub-Regional Strategies, along with wastewater treatment and water. MWAC considers that waste management (including recycling, resource recovery and disposal of waste) is an essential service/utility. Landfills and resource recovery facilities/operations provide an essential community service which, if discontinued, would result in substantial environmental, social and economic impacts at a local, state and global level.

3. Draft Waste Strategy for Western Australia

The Waste Authority has produced Draft II of the Waste Strategy for Western Australia. This document aims to provide 'a forward looking approach for coordinating the efforts of state and local government, the waste industry and other involved groups in delivering wise management of waste across the state' (2010b, p. 6). As well as producing targets for resource recovery, the Waste Authority makes the commitment to 'develop a waste infrastructure plan for the south-west of Western Australia, in the first instance, from around Geraldton to Albany' (2010b, p. 23). It is anticipated that the Department of Planning will be involved in these discussions, as it would have been expected that the Waste Authority, as the appropriate State Government body, would have been consulted in the development of the Sub-Regional Strategies.

4. Local Government expectations

Local Government expects that waste management infrastructure will be considered in the Outer Metropolitan Perth and Peel, and the Central Metropolitan Perth Sub-Regional Strategies. In regard to consultation, there is an expectation that the Department of Planning and the WAPC contact the Regional Councils, in addition to Local Governments, as they are responsible for waste management services in the metropolitan area.

There is also an expectation that the Department of Planning and the WAPC will consult with the Waste Authority. As stated in the Central Metropolitan Perth Sub-regional Strategy, 'the Department of Planning has been engaging with key service agencies to confirm agency awareness of the housing targets and to link current and future capital works projects and the sub-regional scale' (p. 7), there is an expectation that this engagement is extended to the Waste Authority, as well as Local Government and Regional Councils.

5. References

Australian Bureau of Statistics Website 2010, Accessed 7 December 2010
<http://www.abs.gov.au/websitedbs/D3310114.nsf/home/home?opendocument>

Environment Protection and Heritage Council 2010, 'National Waste Report 2010', NEPC Service Corporation, Adelaide.

Waste Authority 2010a, 'Appendix 2: Waste in Western Australia – additional data' in 'Draft II Waste Strategy for Western Australia', Government of Western Australia, Perth.

Waste Authority 2010b, 'Draft II Waste Strategy for Western Australia', Government of Western Australia, Perth.

Western Australian Government 1986, *Environmental Protection Act 1986*.

Western Australian Government 2007, *Waste Avoidance and Resource Recovery Act 2007*