

Submission on the *Waste Avoidance and Resource Recovery Strategy 2030 – Consultation Draft*

July 2024

About WALGA

The Western Australian Local Government Association (WALGA) is an independent, member-based, not for profit organisation representing and supporting the WA Local Government sector. Our membership includes all 139 Local Governments in the State.

WALGA uses its influence, support and expertise to deliver better outcomes for WA Local Governments and their communities.

We advocate to all levels of Government on behalf of our Members, and provide expert advice, services and support to Local Governments.

WALGA's vision is for agile and inclusive Local Governments enhancing community wellbeing and enabling economic prosperity.

Acknowledgement of Country

WALGA acknowledges the continuing connection of Aboriginal people to Country, culture and community. We embrace the vast Aboriginal cultural diversity throughout Western Australia, including Boorloo (Perth), on the land of the Whadjuk Nyoongar People, where WALGA is located and we acknowledge and pay respect to Elders past and present.

Introduction

WALGA is pleased to provide comment on the Waste Authority's [Waste Avoidance and Resource Recovery Strategy 2030 – Consultation draft](#). The Consultation Draft (draft Strategy) has been developed based on a public consultation process that commenced with the release of Waste Strategy Directions Paper in mid-2023. WALGA made a [Submission](#) on the Directions Paper and many of the issues raised have been incorporated into the draft Strategy – including an increased focus on waste avoidance and regional and remote waste management.

The *Waste Avoidance and Resource Recovery Act 2007* identifies the purpose of the Waste Strategy as:

to set out, for the whole of the State –

(a) a long term strategy for continuous improvement of waste services, waste avoidance and resource recovery, benchmarked against best practice; and

(b) targets for waste reduction, resource recovery and the diversion of waste from landfill disposal.

The draft Strategy sets out a new vision, strategic priorities and targets for the five-year period 2024-29, as well as five key priority areas which will be the focus for the waste strategy roadmap detailing the State Governments' key initiatives and actions over the next five years.

The priorities are:

- **Better outcomes for regional and Aboriginal communities:** ensuring adequate and appropriate waste infrastructure and services to meet their needs.
- **Increasing our focus on waste avoidance:** avoiding waste generation through reuse, repair and maintaining the value of products and materials for as long as possible.
- **Better management of priority materials:** improved recycling of high impact materials and priority waste streams.
- **Realising the economic potential of recycling:** fulfilling the potential recovery of value and resources, increasing infrastructure investment.
- **Contingency planning and climate resilience:** strengthening the waste sector's planning, adaptability and response to emergency events.

This Submission has been developed with input from Local Governments and Regional Councils. It examines the current progress against targets, identifies areas of the new strategy supported by Local Government and makes recommendations for clarifications or improvements to ensure a fit for purpose strategy for WA Local Governments.

Current Waste Strategy Implementation

The draft Strategy outlines the current targets for 2025, as set by the 2019 Waste Strategy, will not be met, although there has been positive movement in most areas. The draft Strategy, along with the Waste Authority's 23/24 Business and Action Plan, highlights in coming years waste to energy and the further implementation of FOGO systems is anticipated to reduce the amount of Waste Levy funds collected, and potentially the amount available for strategic waste management funding.

WALGA has a clear [Policy Statement](#) on the Levy which articulates the position that all funds raised through the Levy should be used for strategic waste management purposes. Local Government **strongly opposes the application of the Levy to non-waste management related activities**, such as funding State Government core activities that should be funded from consolidated revenue.

Levy funds should be expended on programs that:

- a) Support the achievement of targets, and reflect the priorities, within the State Waste Strategy
- b) Provide adequate funding and support for Regional Councils, non-metropolitan and metropolitan Local Governments, ensuring the difference in regional priorities are recognised
- c) Fully fund the life-cycle costs of infrastructure and services
- d) Facilitate the development, implementation and ongoing operation of Product Stewardship Schemes.

WALGA acknowledges the anticipated decrease in Levy funds collected and reiterates its position that **all funds raised through the Levy should be directed to strategic waste management purposes** to enable the achievement of the proposed strategy targets. WALGA's position is also clear that the Levy **should not be applied to waste generated in the non-metropolitan area** or to waste received at premises undertaking licensed activities whose primary purpose is resource recovery.

Vision and key principles

The draft Strategy sets out the revised vision of:

A sustainable, low-waste future powered by a circular economy, where our communities, economies and environment thrive.

A longer vision statement is also included in the draft Strategy, which goes into more detail on the key elements of the vision. The vision is supported by four key principles:

1. Reduce the impact of waste on the environment and climate.
2. View waste management as an essential service.
3. Share responsibility and empower everyone to make changes.
4. Ensure circular economy benefits are felt by all communities.

WALGA supports the revised focus for the vision to include circular economy principles across all levels of government and industry sectors, as a circular economy cannot be achieved by focusing on effective waste management only. The four principles identified are supported, however it is not clear what role they play within the Strategy, and if they are intended to be monitored or reported against.

Recommendation: Clarify the role of the four principles identified in the draft Strategy.

In the detailed draft Strategy vision, product stewardship is identified as a foundation. WALGA **strongly supports the inclusion of product stewardship as a foundation of the Strategy's vision.** The challenge for the WA Government, to implement product stewardship, is that much of the action is taking place at a national level. WALGA is advocating for the Commonwealth Government to implement effective Product Stewardship schemes, for all products, that drive environmentally and socially sustainable outcomes through the design, manufacture and distribution of products that can be more easily reused, repaired, recovered or recycled.

If national action is not progressed within a reasonable timeframe or in a way that meets the needs of the Western Australian community, then Local Government supports a State based approach to Product Stewardship.

National product stewardship action has been progressed on key materials including e-waste and packaging, however a shift in focus at the Commonwealth level has seen the development and implementation of these schemes delayed, with further work expected to occur in late 2025-26.

The delay in implementation of the broader e-waste scheme is anticipated to further raise costs for Local Governments providing e-waste recycling services, as increased public awareness of the State Government e-waste to landfill ban is likely to increase the amount of e-waste items brought to collection points for recycling. State Government support is therefore required to assist Local Government in providing e-waste collections and meeting the associated recycling and transport costs, until an effective national product stewardship scheme is in place for all e-waste.

Recommendation: The WA State Government undertake advocacy, at a national level, to implement effective product stewardship for priority materials (packaging, electronic waste, tyres and mattresses).

The circular economy diagram included in the draft Strategy highlights the benefits of a circular economy, however is missing the key element of **designing products for circularity**, as the design stage determines whether and to what extent a product can be reused, repaired or recycled. While work has been initiated at a national level to implement mandatory design standards for packaging, continued advocacy is required to ensure products entering the market are designed to maintain the highest value as long as possible.

Recommendation: The WA State Government undertake advocacy, at a national level, to implement design standards for products entering the market to ensure they can be easily reused, repaired, recovered or recycled.

2030 Targets

The targets presented in the draft Strategy have been retained from the current Strategy, under the key goals of Avoid, Recover and Protect. New targets have been included for each goal, along with two targets to cover all three areas (Figure 1).

Our 2030 goals and targets		
Avoid Western Australians generate less waste.	Recover Western Australians recover more value and resources from waste.	Protect Western Australians protect the environment by managing waste responsibly.
<ul style="list-style-type: none"> ○ 20% reduction in waste generation per capita <ul style="list-style-type: none"> - MSW: 10% reduction in generation per capita - C&D: 30% reduction in generation per capita - C&I: 10% reduction in generation per capita ○ New target: Adopt national circular economy metrics (as they are developed) to measure avoidance and circularity ○ New target: Develop avoidance measures and targets for specific materials consistent with national targets 	<ul style="list-style-type: none"> ○ Recover energy only from residual waste ○ Increase the recycling rate to 75% <ul style="list-style-type: none"> - MSW: Increase the recycling rate to 70% in Perth and Peel, 60% in major regional centres - C&D: Increase recycling rate to 80% - C&I: Increase recycling rate to 80% ○ New target: Continue to deliver household and commercial FOGO/FO collection and recycling services in Perth, Peel and major regional centres. 	<ul style="list-style-type: none"> ○ No more than 15% of waste generated in Perth and Peel is landfilled ○ Move towards zero illegal dumping ○ New target: Adopt the 2030 litter reduction target to be developed through the next litter prevention strategy (2025–30)
Avoid - Recover - Protect		
<ul style="list-style-type: none"> ○ All waste is managed and/or disposed of using better practice approaches and facilities ○ New target: Reduce disposal of organic waste to landfill by 50% (from 2019–20 levels) 		
Our 2030 strategy priorities		
1. Better outcomes for regional and Aboriginal communities	2. Increasing our focus on waste avoidance	3. Better management of priority materials
4. Realising the economic potential of recycling	5. Contingency planning and climate resilience	
Strategy roadmap		
Actions and initiatives to be developed with stakeholders		

Figure 1: Draft Strategy Targets

Overarching Avoid-Recover-Protect targets

There are two overarching Targets in the draft Strategy:

- All waste is managed and/or disposed of using better practice approaches and facilities
- Reduce disposal of organic waste to landfill by 50% (from 2019-20 levels)

The first target is a variation of a target included in the current Waste Strategy (under the Protect heading – all waste is managed/disposed to better practice facilities). In a previous [submission](#) WALGA questioned the position of better practice guidance in a regulatory context and how implementation would be monitored and enforced. Currently only one better practice guidance document has been developed for facilities, for collection there are kerbside and vergeside and drop off better practice guidance. For regional and remote Local Governments with limited resources any better practice approach is likely to require significant support to implement.

Better practice approaches should build on the regulatory frameworks in place for waste facilities, rather than being compliance-based, and be developed in consultation with industry to ensure effective implementation.

Recommendation: The Department ensure there are sufficient resources in place to develop better practice guidance, in consultation with stakeholders, and implement any new practices, processes or infrastructure.

The development of the Recovered Materials Framework is understood to be in progress, and will be essential in ensuring end users have high confidence in the quality and safety of products derived from recovered materials through developing consistent, outcomes-based standards and investment certainty.

Recommendation: The development and implementation of the Recovered Materials Framework, within a set timeframe, be included as an action in the Strategy.

The new target of reducing disposal of organic waste to landfill by 50% raises several concerns. WALGA has identified in previous submissions the limitations on provision of timely and accurate

waste and recycling data, particularly in the case of the Commercial and Industrial (C&I) sector, where a significant percentage of food waste diversion has been identified. While overall tonnage data has been recorded, there has been very limited waste composition data, and data that was available lacked the necessary granularity to assist in developing waste avoidance and resource recovery solutions. Supporting the 50% reduction as an effective target would require a clear baseline figure on organic waste sent to landfill in 2019-20 across both the Municipal Solid Waste (MSW) and C&I streams, which is not likely to be available and therefore not measurable with a high degree of confidence.

Engagement with stakeholders across all waste streams is required to determine an appropriate baseline, in order to assess and measure the impact of each sector and set achievable outcomes.

WALGA understands that the Target has been established to align with [the national target](#), which focuses heavily on FOGO implementation, and establishing organics processing infrastructure, as the mechanisms to achieve it. In Western Australia, with waste to energy facilities anticipated to be operational by 2024/5, the diversion of much of the waste stream from landfill is highly likely. However, this Target in the absence of a more focused approach on waste avoidance risks landfill diversion being the only metric, not diversion of waste to highest and best use.

Recommendation: Include specific actions in the proposed roadmap to improve data collection and provision to support measurable targets.

Recommendation: Reword the target from 'reduce disposal of organic waste to landfill by 50%' to reflect waste hierarchy principles and focus on diversion to highest and best use.

Avoid

In previous submissions WALGA has questioned the use of a per capita 'Avoid' target, as it does not provide a useful measure on the effectiveness of waste reduction initiatives (as waste generation is strongly linked to economic growth) and does not delineate between metropolitan and regional areas where communities may have more limited waste avoidance options. Again, the WA Strategy is being influenced by the National Targets to reduce per capita waste generation.

WALGA supports the new target of developing avoidance measures and targets for specific materials consistent with national targets, with the recommendation that Western Australia is well represented throughout the process to ensure the targets are achievable and appropriate for the WA community.

More information is required as to what the "circular economy metrics" will be before WALGA can offer a position regarding their adoption.

Recommendation: That the State Government implement specific waste avoidance measures for key priority materials, including food waste.

Recover

The Recover goal retains the target to recover energy only from residual waste. However, the definition of residual waste is not included in the draft Strategy and should be defined as in the 2019 Strategy, which established the requirement for energy recovery only from residual waste – *waste which remains following the application of better practice source separation and recycling systems*.

It is not clear from the draft strategy or from discussions with the Department as to how this condition will be monitored or enforced, and whether pre-existing contracts with Local Governments for general waste including organics (prior to the 2019 Strategy) will be subject to the same requirement.

FOGO targets are slightly reworded in the draft Strategy, to focus on "continuing to deliver FOGO" rather than requiring FOGO for all households in Perth/Peel. The rewording moves away from a timed commitment, stating *'The Waste Authority and the Department of Water and Environmental*

Regulation continue to work with the nine Local Governments not yet committed to FOGO, to facilitate implementation'. As there is no detail provided around the facilitation, Local Governments not yet committed have requested clarification on whether they will be required to move to FOGO to support the strategy targets and how this may align with existing waste to energy agreements.

Local Governments have expressed concerns over the financial and physical resources required to implement FOGO, as the Better Bins Plus funding covers only a proportion of the costs required.

Recommendation: That the Department clarify how the target for 'energy recovery only from residual waste' will be monitored and enforced.

Recommendation: That the Department provide further information as to Local Governments' requirements to adopt better practice separation systems, including implementation timeframes.

Recommendation: That the Department increase funding support to Local Governments to fully cover the costs of implementing better practice separation systems.

The wording of the new target also identifies, but does not define, major regional centres in the context of continued FOGO delivery. If the same definition as used in the current strategy is applied, this refers to Albany (Great Southern Region), Bunbury (South West region), Busselton (South West Region), Greater Geraldton (Mid West region) and Kalgoorlie-Boulder (Goldfields-Esperance Region).

The proposed recycling target rate of 60% for major regional centres requires clarification in whether it applies to an average rate across all centres, or an individual rate of 60% for each one.

Presently, there is a significant range in capacity for recycling collection and processing between the five centres. Bunbury and Albany have three bin FOGO systems in place, while Busselton and Kalgoorlie-Boulder are operating two bin waste and recycling systems and Geraldton offers a kerbside general waste (but has explored FOGO).

Recommendation: Define Major Regional Centres in the Strategy and identify if the 60% target is measured at an aggregate level, or individually.

The Targets have been reworded to say "recycling" rather than "increase material recovery to 80%" to align with the terminology used by other jurisdictions.

The new target of establishing commercial FOGO and FO collections would theoretically contribute significantly to recovery rates of organic waste, however this would require significant resources and collaboration between industry, State Government and Local Government to determine roles and responsibilities for an integrated program across the State.

Protect

Progress toward the Protect target of *no more than 15% of waste generated in Perth and Peel is landfilled* will be supported by the ongoing implementation of FOGO services across the metropolitan area and the introduction of waste to energy facilities.

The new target for litter replaces the 'Move towards zero littering' target included in the current Strategy. Using the new Litter Strategy targets is a good approach, providing all stakeholders are provided with the opportunity to have input into the Strategy.

The Target of move towards zero Illegal dumping remains, and will need strong supporting programs and resourcing to achieve. Illegal dumping can range from the household level where bags of rubbish or items are dumped to large scale dumping of commercial and construction waste, and often falls to Local Government to manage collection and disposal of the waste, requiring significant financial and physical resources. Illegal dumping has impacts across many different land holders including State Government agencies and a comprehensive strategy is needed to map the actions necessary from all stakeholders to achieve the zero illegal dumping target.

Recommendation: Stakeholders have the opportunity to contribute to the development of the Litter Reduction Strategy and associated targets.

Recommendation: The State Government develop an Illegal Dumping Strategy to map how the target will be achieved.

Following the implementation of the Container Deposit Scheme, Containers for Change, in 2020, the amount of beverage containers littered has significantly reduced. The Scheme currently accepts container types which are most likely to be littered, however feedback from Local Governments shows a wide range of containers, including wine bottles, are reported as litter. Litter reduction is only part of the Scheme's benefits and WALGA has [advocated](#) for several changes to the Scheme, including the expansion of the Scheme to include wine and spirit bottles as a minimum.

Consultation on expansion of the scheme to include a broader scope of container types was undertaken in 2023, with an announcement on a potential expansion yet to be made.

Recommendation: The State Government, as a matter of priority, expand the scope of container types accepted as part of Containers for Change.

Priorities

The draft Strategy outlines five priorities (all of equal importance):

- Better outcomes for regional and Aboriginal communities
- Increasing our focus on waste avoidance
- Better management of priority materials
- Realising the economic potential of recycling
- Contingency planning and climate resilience.

WALGA conditionally supports the five priorities identified, with some clarifications required on each priority. The greater focus on specific priority areas will assist in ensuring that specific targets can be achieved. However, at present, modelling is not available to support how each of the listed priorities will contribute to achieving the strategy targets.

Priority 1: Better outcomes for regional and Aboriginal communities

Regional and remote communities face a diverse range of challenges in managing waste, and WALGA welcomes the inclusion of regional and Aboriginal communities as a priority in the draft strategy. Many regional Local Governments do not have collection systems in place for target materials, such as kerbside recycling or FOGO collection, due to financial and infrastructure constraints. 36 Local Governments outside Perth and Peel do not currently provide a kerbside recycling collection, and only two non-metropolitan Local Governments north of Perth have trialled FOGO collections. FOGO is in place in seven Local Governments in the South West, and one in the Great Southern region.

For Local Governments not currently providing a kerbside recycling or FOGO service, establishment costs include infrastructure (bins and caddies), potential fleet investment, variation to collections contracts, and resourcing for operational and support roles including education and communications.

Regional Local Governments identify transport costs as a key barrier in implementing and maintaining recycling services. WALGA will continue to advocate for product stewardship schemes to cover the full cost of collection, transport and processing of material covered, however Local Governments will require support and guidance to assess the long-term viability of establishing and maintaining collection services.

Coordination and support is vital for regional and remote communities to improve their waste management outcomes, and infrastructure planning must be tailored to individual regions.

The State Waste Infrastructure Plan, while a useful starting point for infrastructure planning across the state, has significant limitations as a practical document for Local Governments. WALGA welcomes the inclusion of *'identify priority regions and develop regional waste and recycling infrastructure plans with regional development commissions and key stakeholders'* as a proposed action under the strategy, as this offers an opportunity for Local Government and the community to be involved in waste planning in the region and reliably informs the overall strategic direction.

The development of regional plans will require significant resources and WALGA supports the cross-sector approach identified in the draft actions. It is also recommended that funding opportunities outside the WARR account be investigated, to ensure programs can be adequately resourced and build capacity within communities.

Regional Local Government feedback shows the consolidation model, where infrastructure is established or expanded for the purpose of consolidating and transporting material to Perth and Peel, is not supported as a priority. The preference is for the creation of precincts within the region to facilitate waste being received and processed locally to maximise benefit to local communities, or a series of small individual processing facilities in key areas.

Recommendation: As part of the Strategy implementation, regional infrastructure plans be developed that focus on developing infrastructure solutions to manage waste close to source in order to develop local industry and employment.

There is a significant scope to leverage existing systems, such as Containers for Change to provide a hub for product stewardship and a network of collection locations for materials which cannot be disposed of in kerbside bins, or where no appropriate kerbside system exists. Local Governments have provided very positive feedback on how the Containers for Change Program has assisted in providing recycling options for regional and remote, as well as metropolitan, communities. WALGA identified this as an opportunity for the Scheme, in the initial consultation on its development. For example, many of the Container Deposit Scheme depots in South Australia also collect e-waste and scrap metal. However, this will only be achievable if the material collected is also part of an effective product stewardship scheme which covers all the costs associated with collection, transport and recycling. This approach will ensure these services are accessible across WA, even in areas with limited Local Government services available.

Recommendation: That the State Government work with Containers for Change to leverage the extensive collection network in place to provide opportunities for collection of other materials covered by effective product stewardship schemes.

WALGA notes that while resource recovery is a key focus, for many regional areas landfill is the main option for waste management. For these areas the focus should be on operating the facility in the best way possible, through provision of guidance and funding support.

Priority 2: Increasing our focus on waste avoidance

WALGA supports the renewed focus on waste avoidance in the draft Strategy and welcomes the approaches to facilitate reuse and repair to maintain product value. However, the key initiatives and actions outlined focus on keeping existing materials in circulation rather than avoiding the generation of waste in the first instance, which is the highest priority in the waste hierarchy. The draft Strategy refers to the national focus on food waste, with the National Food waste Strategy target to halve Australia's food waste by 2030, however actions around food waste have not been included in the draft initiatives and actions. Local Government feedback demonstrates that education alone is not effective in facilitating waste avoidance, and specific programs and incentives should be considered. With increasing pressures on cost of living, supporting the community to reduce food waste should be prominent in Strategy implementation.

Recommendation: That Food Waste be identified in the Strategy as a key focus area for program delivery.

WALGA would like to emphasise the importance of product stewardship as a key approach which can provide significant waste avoidance outcomes. Product stewardship can influence product design and focus on reducing waste generation throughout the product lifecycle.

Local Governments are keen to ensure there are effective local repair and reuse options, however there are limited funding opportunities available. Options such as reuse shops at transfer stations and landfills offer a great local opportunity to facilitate reuse.

Recommendation: A specific funding program be developed for local repair and reuse opportunities.

Priority 3: Better management of focus materials

The draft Strategy revises the previous list of focus materials down to three key materials – organic waste from the MSW and C&I waste streams, plastics, and e-waste and batteries.

WALGA acknowledges the high impact of these materials on the waste stream and supports the reduction in number of priority materials, with a focus on organic waste. The rationale for including these materials relates to emissions reduction, contribution to targets and potential impact on human health and the environment. The potential impact of batteries and e-waste is significant, with increasing impact on the waste industry through incorrect disposal leading to truck and facility fires and consequently increasing ongoing costs for mitigation measures and insurance.

While the focus materials identified are of high priority for Local Governments, all three have had considerable time and resources invested, at both state and national level, and have progressed actions towards better management which are well underway. The draft Strategy offers an opportunity for Local Government to identify further focus materials where action has not been taken or progressed at a state or national level, and advocate for frameworks and programs to assist in managing these waste streams.

How the priority of these products will be used in Strategy implementation is a key consideration. There are other high impact products, such as Household Hazardous Waste, which have effective programs in place, and it is anticipated that such initiatives would not be reduced because they are not listed as a priority product.

WALGA acknowledges the intent of the e-waste to landfill ban and its alignment to global, national and local environmental and recovery targets. However, WALGA's position on landfill bans is that such bans are only supported in the presence of effective product stewardship schemes, or other funding mechanisms, for products which would be subject to the ban.

The current National TV and Computer Recycling Scheme (NCRS) is not considered effective as it covers only a proportion of the costs of e-waste recycling, particularly for regional Local Governments required to transport material to Perth for recycling. Development of the national e-waste product stewardship scheme has been delayed and additional funding support is required for Local Governments to continue to manage e-waste volumes into the future.

Many Local Governments are collecting batteries through their facilities including libraries, recreation centres, landfills/transfer stations and administration centres. These collection points were established in the absence of any product stewardship alternative. As the B-Cycle product stewardship scheme continues to establish, a clear opportunity for Local Government is to transition away from collections at these facilities and toward established B-Cycle drop off points.

Local Government has also expressed concern regarding the recycling and recovery options for paper and cardboard, as this is a significant amount of material and currently the only market is export. With the Export Bans for this material coming into force July 2024, and infrastructure yet to be developed this is a priority material for the sector.

Recommendation: The Department:

- Identify what 'success' is for each of the Priority Products.

- Review the Priority Products listing as effective action is undertaken to address each of the materials.
- Add paper and cardboard to the list of priority products.

Priority 4: Realising the economic potential of recycling

Leveraging State Government procurement is a welcome addition to the draft Strategy, and strongly supports developing markets for material by ensuring recycled materials are included in State Government projects. However, this can be taken further than the proposed focus on recycled materials and expanded to include waste avoidance/reduction procurement practices such as lease arrangements for State Government agencies and contracts.

As previously mentioned, waste amount and composition data for the C&I sector is significantly lacking and there has to date been limited assistance provided to the commercial and industrial (C&I) sector. A focus could include targeted programs to assist businesses (on a sector by sector basis) to assess and reduce their waste and improve resource recovery. In the non-metropolitan area Local Governments frequently assist in managing C&I waste as there may be limited or no other service providers.

The development and implementation of a Recovered Materials Framework is a key action in ensuring producers and suppliers have a high degree of confidence in using waste derived materials across a range of applications. However, the draft actions include the framework but focus on developing guidelines and a regulatory framework specifically for bottom ash produced from waste to energy operations.

Recommendation: The State Government support market development, products specifications, and recycled content procurement guidelines alongside integrated waste avoidance/reduction procurement practices.

Priority 5: Contingency planning and climate resilience

The draft Strategy identifies that WALGA has developed a framework to strengthen waste management considerations in local emergency management planning, response and recovery (WALGA, 2018) and is working to establish a Preferred Supplier Panel for Hazardous and Emergency Event Services. This work was undertaken to support Local Government planning for emergency events, but further action is needed to assist Local Government to actively reduce hazards which could be caused by these events.

WALGA supports the proposed initiative to improve data and information on emergency waste disposal options, and recommends guidance and support be provided to Local Governments to identify areas of risk and prioritise actions to reduce hazards, such as removal of asbestos.

Many Local Governments do not have the skills, capacity and subject matter expertise to undertake an emergency risk management assessment process for Emergency Management hazards without support and clear guidance from the State Emergency Management Committee.

Recommendation: That State Government guidance and funding support be provided to Local Governments to undertake risk assessment and mitigation as part of emergency preparedness activities, and to assist in coordinated clean up following a disaster event.

An inter-agency approach to planning is essential not only for disaster management but also for potential large scale biosecurity events, such as the recent work led by Department of Primary Industries and Regional Development around a potential Foot and Mouth disease outbreak, which would require significant Local Government participation from both a waste management and community perspective. Developing a consistent framework for use across large scale events would assist in defining State and Local Government roles and responsibilities and provide support and direction in response and recovery. WALGA is engaged in the work that the Department of Fire and Emergency Services is undertaking on waste management and considers that it is

essential that how waste is managed post event is clearly agreed and articulated, through an agreed framework.

Recommendation: The State Government to foster inter-agencies collaboration and clearly outline roles, responsibilities, escalation process and support available to Local Governments through a State Emergency Waste Management framework.

Conclusion

WALGA conditionally supports the vision and priorities set out in the draft Strategy, with greater focus recommended on the following activity areas:

- Continued advocacy at a national level for effective product stewardship schemes, which deliver waste avoidance outcomes and cover the full cost of transport and recycling, for priority materials including e-waste, packaging, tyres and mattresses.
- Continued advocacy at a national level to implement design standards for products entering the market to ensure they can be easily reused, repaired, recovered or recycled.
- Expanding the scope of container types accepted as part of Containers for Change, to further support litter reduction and recycling efforts.
- Leveraging the extensive Containers for Change collection network in place to provide opportunities for collection of other materials covered by effective product stewardship schemes.
- Development of fit for purpose regional infrastructure plans that focus on developing infrastructure solutions to manage waste close to source in order to develop local industry and employment.
- Including food waste as a key focus area for program delivery throughout the Strategy, to contribute toward achieving targets under all three goals (Avoid, Recover and Protect).
- Develop a specific funding program to facilitate local repair and reuse opportunities.
- Review and identify targets for management of priority materials and adopt a framework to assess the priority level of each as effective actions are undertaken.
- Include Paper and Cardboard as a priority material.
- Develop an illegal dumping strategy to map the pathway to zero dumping.
- The State Government support market development, products specifications, and recycled content procurement guidelines alongside integrated waste avoidance/reduction procurement practices.
- Support provided for Local Governments to undertake risk assessment and mitigation activities for emergency preparedness, such as asbestos removal.
- Support provided to Local Governments in planning and response to emergency events through the development of a State Emergency Waste Management framework.