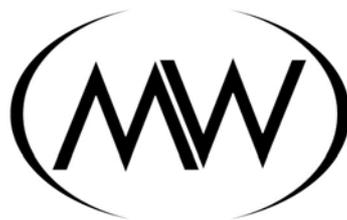




WESTERN AUSTRALIAN  
LOCAL GOVERNMENT ASSOCIATION

**SUBMISSION**  
**TO**  
**THE GOVERNMENT OF WESTERN**  
**AUSTRALIA ON**  
**‘PROGRAM FOR MANAGING**  
**HOUSEHOLD CHEMICAL WASTE IN**  
**WESTERN AUSTRALIA’**

PREPARED BY THE



MUNICIPAL WASTE ADVISORY COUNCIL

**November 2004**

## Acknowledgements and Background

The Municipal Waste Advisory Council (MWAC) is a standing committee of the Western Australian Local Government Association (WALGA) with delegated authority to represent WALGA in all matters relating to solid waste management.

MWAC has been formed through collaboration with Regional Councils who are not ordinary members of WALGA. The resulting body effectively represents the views of all Local Government bodies responsible for waste management in Western Australia.

Decisions and positions adopted by MWAC are considered by a board of Elected Member representatives from each member organisation who are supported by an Officers' Advisory Group (OAG) which has officer representatives from each member organisation.

Positions adopted by the Municipal Waste Advisory Council represent a consolidated viewpoint from local government and may differ from the positions adopted by individual member organisations. MWAC's member organisations are:



## **Executive Summary**

The document entitled 'Program for Managing Household Chemical Waste in Western Australia' (the Program) has been released following the release of a Strategic Direction for Waste Management in WA. In its response to the Strategic Direction on Waste Management in WA consultation, the Municipal Waste Advisory Council identified a program to deal with household chemical (hazardous) waste as a priority. The development of the proposed Program is therefore welcomed as relevant and timely.

The comments provided in this submission draw upon feedback from all metropolitan Regional Councils, and seven individual metropolitan and non-metropolitan Local Governments following distribution by the Municipal Waste Advisory Council of the Program documentation. Comments on the Program also stem from the Policy Statement on Household Hazardous Waste prepared by the Municipal Waste Advisory Council in consultation with Local Government across the state.

In general, the documentation lacks accuracy in some key areas and fails to table significant sources of information in others. Any redrafting of the Program documentation should address the concerns in this area as detailed in the body of this response.

The Program does not consistently and clearly assign roles and responsibilities to the major players. In general, the responsibility for actions or activities relating to the increased role of industry and consumers in managing household chemical wastes are poorly defined. Phrases such as "It is hoped" and "An opportunity now exists for the DoE to work cooperatively..." fail to instil confidence in the Program roles being clearly identified and communicated. A number of assumptions are hidden in the document. These assumptions need to be clearly stated so that the relevant parties are able to proceed with confidence in their respective actions.

The Program fails to provide a clear and logical process for establishing the elements of Extended Producer Responsibility in respect of household chemical wastes. Evidence from other jurisdictions would suggest that significant voluntary involvement by industry, in the absence of a clear commitment to prepare regulatory options to deal with problematic materials, is unlikely.

The proportion of financial resource dedicated to the pursuit of Extended Producer Responsibility options in the Program budget is not consistent with either the importance of this endeavour or the statements sprinkled throughout the Program documentation. It is suggested that half of the financial resource put to the Program should be earmarked for work on moving to a system with Extended Producer Responsibility as its core.

The Program envisages the employment of a fulltime coordinator. It is not clear from the Program documentation what the specific role of this coordinator would be. In the absence of sufficient justification for the position it is suggested that the resource should be put into improving the context in which household chemical waste is managed.

In summary, the proposal to deal with the management of household chemical waste through a specific Program is supported. The relative priority of activities within the Program and the specific roles of particular resources require further development if they are to benefit from the support of Local Governments.

## **Our Submission**

### **Section 1 – General Comments on the Scope, Content and Structure of The Document**

In collating the responses from local government officers to the Program the following key points emerged:

#### Positives – The Program as documented

- Targets an identified need with a specific program
- Identifies aspects of a role for the Department of Environment in managing the Program
- Generally identifies which actions need to be addressed
- Acknowledges the need to involve other parties in the Program
- Identifies a source of funding to allow actions to be resourced.

#### Negatives – The Program as documented

- Includes some erroneous data
  - Table 1 does not include the transfer stations operated by the City of South Perth and the Western Metropolitan Regional Council
  - Page 4 – comments on the status of the Municipal Waste Advisory Council Policy Statement incorrectly implies that Local Governments are bound by the Statement.
- Page 4 – fails to include the corollary roles identified in the Municipal Waste Advisory Council Policy Statement for State Government and industry stakeholders. To do so implies that Local Governments would be prepared to accept these roles in isolation from a commensurate commitment from the other stakeholders – this is not the case.
- Fails to list the most recent and possibly relevant piece of work (auspiced by the Department of Environment!) on household hazardous waste collection issues – namely ‘Household Hazardous Waste Collection – What is best practice?’

authored by Christine Teague from the DIVISION OF SCIENCE and ENGINEERING at MURDOCH UNIVERSITY, December 2003.

- The definition of Household Chemical Waste appears to exclude electronic and electrical goods even though these items are part of the waste stream that can be “...harmful when released into the environment...” as per the definition provided. It is not clear that this distinction between ‘chemicals’ and other potentially harmful products in the household waste stream is useful for the purposes of dealing with the public – for instance through an education campaign.
- Several mentions are made of an Industry Waste Reduction Program/Scheme without providing any context as to what this constitutes or how it fits with the Program. It is unclear whether the Program includes the Industry Waste Reduction Program or whether it is to be developed separately –and if so by whom and when.
- The document states in section 2.3 that the more costly element of the program is disposal to landfill. Local experience would suggest that the most significant costs arise in identifying the ‘unknowns’, arranging for their treatment prior to disposal and in building and staffing collection centres. The cost of disposal to landfill is unlikely to be significant given the quantity of material involved.

## **Section 2 – Roles and Responsibilities**

The Program documentation fails to consistently clarify the roles of the key stakeholders possibly with the exception of Local Government. It is fair to say that much of the concern over the last few years regarding action on the Program area has related to the lack of clarity of roles, responsibilities and commitments.

Reference should be had to the Municipal Waste Advisory Council Policy Statement on Household Hazardous Waste where a set of roles are clearly laid out. A similar clear statement of roles should be explicit in this Program.

### **Section 3 – Extended Producer Responsibility**

The Program documentation makes numerous references to the importance of Extended Producer Responsibility and Product Stewardship but fails to put forward a clear set of actions which will lead to the adoption of these approaches.

Statements such as “It is hoped by the end of three years, the industry and local government negotiations will result in taking ownership of the program including establishing product stewardship of harmful chemicals with industry responsible for their own product life cycle management” fail to properly recognise the significant body of work required for this to happen. The task requires a ‘champion’ and the state government, possibly through the Waste Management Board, is best placed to take on that role. Accordingly a cogent strategy for bringing this about should form a significant portion of the Program.

### **Section 4 – Priority of Funded Activities**

The Program as proposed applies too little resource to the task of fundamentally improving the context in which household chemical wastes are managed. In the absence of any apparent justification the expenditure of 26% of the budget on a project coordinator appears to be ill-advised. The proportion of funds allocated to treatment and disposal in rural areas also appears to be very significant – even though the issues in non-metropolitan areas are very different (see next section).

Local Government collections can be relatively easily coordinated through a joint contract with a service provider. There appears to be no compelling justification for an ongoing resource to manage a contract of this nature (a similar type of contract is managed by the Municipal Waste Advisory Council for groundwater monitoring and experience suggests that after the initial set up of the contract a relatively modest time is sufficient to oversee the contract).

The Municipal Waste Advisory Council has indicated that it is willing to assist in the development of such a contract as part of a commitment to the management of these materials.

It is suggested that a more appropriate allocation of resources for the Program would be for a 50/50 split between, treatment and disposal costs in both metropolitan and non-metropolitan areas, and fundamental change to the context in which household chemical wastes are managed through the implementation of Extended Producer Responsibility mechanisms.

### **Section 5 – Metropolitan and Non-Metropolitan Context**

The Program suggests that there is little difference (for the purposes of this issue) between metropolitan and non-metropolitan areas. This would appear to be an ill-founded assumption for the following reasons:

- Non-metropolitan areas do not have the imperative of removing household chemical wastes from the waste stream to allow resource recovery (organic) processes to operate effectively
- Non-metropolitan areas have a greater challenge funding the proper collection and disposal of the household waste stream due to factors of scale and population.
- Non-metropolitan areas have not had experience with the ongoing collection of household chemical wastes and it is likely that their capacity to staff appropriate collection facilities is very low.
- It could be argued that non-metropolitan areas have higher priority issues such as basic landfill management and that any actions that could detract (financially) from that could be counter-productive.