



WESTERN AUSTRALIAN
LOCAL GOVERNMENT ASSOCIATION

Submission on the Waste Infrastructure Census

Status of this submission

This submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (the Association). 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. It has been formed through collaboration with Regional Councils who are not ordinary members of the WA Local Government Association. The resulting body represents the views of all Local Government bodies responsible for waste management in Western Australia.

A draft submission has been circulated to all Local and Regional Governments in Western Australia, with comments received being incorporated into this document. This submission therefore represents the consolidated viewpoint of Local Government. However, it is acknowledged that the positions outlined in this paper may differ from the positions adopted by individual member organisations.

Summary

The imperative for a comprehensive report detailing the location, nature and capacity of existing waste infrastructure in Western Australia is recognised by the Association. This census report begins to address that need, but falls short of fully meeting requirements in a range of areas. Whilst the report does contain some helpful base information (in particular the location maps), it was found to be generally lacking in scope, accuracy and clarity. The Association believes that the majority of these issues could potentially be addressed by cross-referencing this report with data obtained from other Department of Environment and Conservation (DEC) waste programmes; and through improving the clarity of the information presented.

The issues identified with the report, and recommendations for their resolution, are expanded upon in the following submission.

WALGA Recommendations

WALGA Recommendation 1: That the census be expanded to incorporate all regions across WA. This amendment should be undertaken as a part of the general review of the report incorporating the recommendations suggested below.

Recommendation 2: That clear definitions be provided for terminology used within the report. In particular, definitions are required to clarify the boundaries of the zones used and the nature of the facilities surveyed.

Recommendation 3: That the DEC cross-reference the report against additional data sources at their disposal to enhance the quality and accuracy of the information presented.

Recommendation 4: That the Board consider providing the final waste infrastructure maps (minus confidential information) on-line as a freely available planning resource.

Recommendation 5: That a review of the information presented within the report be undertaken with a view to ensuring all information presented is useful for the purposes of waste infrastructure planning. That is, it should be clear to which region and facility type any information provided applies.

Issues Identified by Local Government

Scope of the Report

It is unclear why the report only covers the Perth Metropolitan, South West, Great Southern and Pilbara regions. It would seem that if the census is intended to form the basis of a Waste and Recycling Infrastructure Plan (WRIP) for Western Australia, then it must encompass the whole state.

WALGA Recommendation 1: That the census be expanded to incorporate all regions across WA. This amendment should be undertaken as a part of the general review of the report incorporating the recommendations suggested below.

Terminology Used

The census does not provide enough clarity with regard to the terminology it uses. This is particularly problematic in two major areas –

1. The census divides the metropolitan area into East, North, Central, South East and South West regions. This is assumed to be referring to the metropolitan zone divisions. However, this is not clear as the report provides no information (either written or pictorial) as to the boundaries of each of these regions. Such information is necessary to provide clarity to the report.

Further, it is suggested that the metropolitan Regional Council boundaries (Mindarie, Eastern, South East, Southern and Western) may be more natural divisions for a waste infrastructure census, as these groupings already exist specifically for waste management purposes.

2. The terminology used for the various waste management facilities reported on is not defined beyond standard landfill licence definitions. This is confusing on a number of levels –
 - a. Transfer stations are never defined. It is assumed that they refer to licence classification 62 'Solid Waste Depots'. This is inferred from the fact page 30 of the report identifies that seven such licensed facilities are to be surveyed; and from the fact that this number of transfer stations is then referred to throughout the report. If this assumption is correct, then it must also be inferred that unlicensed transfer stations are referred to as a different type of waste facility in the report. However, it is not clear what category they are placed under.
 - b. With regard to unlicensed facilities in general, the report's introduction identifies that it will look at recycling and resource recovery aggregation sites; and recycling processing and sorting facilities (e.g. MRFs). However, in the actual data analysis, sites are split between C&D reprocesses; mixed solid waste reprocesses; MRFs; and recycling reprocesses. As no definition is provided for any of these terms, it is impossible to know the exact nature of the facility the author refers to.

Understanding of the information presented in the report would be immeasurably improved by the inclusion of concise definitions to clarify the terminology used. Besides the obvious need to clarify the issues outlined above, it is considered that better definitions would help resolve some of the problems with the quality and accuracy of the information presented. This is discussed in more detail below.

Recommendation 2: That clear definitions be provided for terminology used within the report. In particular, definitions are required to clarify the boundaries of the zones used and the nature of the facilities surveyed.

Accuracy of the Information Presented

Three major concerns have been identified with the quality of information presented in the report. These are the amount of information presented as unknown; contradictions in the information presented; and potentially missing information, particularly in regard to facilities not identified.

1. In the report's results section descriptor, it identifies that 24 (of 189) sites did not respond to the survey and 69 (of 189) sites provided incomplete surveys. This is an issue in itself, as the missing information clearly undermines the value of the census. However, the issue is compounded by the author's decision to include non-responses under the heading of 'Unknowns/Don't know'. It is therefore never clear if the information in the results is genuinely unknown (for example tonnes to landfill may be unknown) or a non-response.
2. The accuracy of the information presented is also brought into question by inconsistencies within the report itself. Although there may be others, examples identified include the following-
 - a. Table 15 gives the number of unlined landfills as 62. In contrast, Table 16 gives the number of unlined landfills in Perth as 13 and Table 17 gives the number outside of Perth as 57; together equalling a total of 70 unlined landfills. It is unclear where this inconsistency is derived from and, although not highly significant, demonstrates issues with the accuracy of the information presented.
 - b. The table 'Sites Accepting Solid Inert Wastes – Class 1 Inert Landfills' identifies four Class 1 Inert Landfills that do not accept inert waste. It seems very unlikely that this information is correct as an inert site could not logically accept any other type of waste. This example highlights potential problems with the overall survey method used to gather information.
 - c. The report identifies the results section will present information on 189 facilities that were surveyed. However, the result tables that look at the features of the different facilities (staffing, fencing, small vehicle access, drop-off centres, and recycling price differentials) only record 185 sites. Although this is only a small difference, it again raises concerns with consistency and accuracy in the report.

3. There is concern that the report may not have identified all waste infrastructure facilities in Western Australia. This is difficult to accurately ascertain due to issues with the way the report presents information (which is discussed in more detail below). However, the following were identified as indicators that some information may be missing from the report –
 - a. The South Perth Collier Park Transfer Station does not appear on the infrastructure map. By contrast, the Balcatta Transfer Station, which is a similar facility, does.
 - b. The number of transfer stations (7) seems very low.
 - c. The number of sites with oil drop-off facilities also seems fairly low. MWAC records show 47 Local Governments in the regions surveyed have oil drop-off facilities. By contrast, the report only identifies 35.

Most of the above issues could potentially be addressed by cross-referencing the report with existing data at the disposal of the DEC including RRRS, landfill levy, and ABS data. Alternatively, the majority of survey questions will be covered by Phase 1 of the Zero Waste Plans. As this programme is soon to be instituted, it could become a valuable primary source of information for completing the infrastructure census. It is acknowledged that some issues with commercial confidentiality may remain, but this should be manageable providing sensitive information is only presented in a consolidated format.

Recommendation 3: That the DEC cross-reference the report against additional data sources at their disposal to enhance the quality and accuracy of the information presented.

Presentation of Information

1. The usefulness of the maps provided could be enhanced if the information they present was improved through the recommendations described above. However, generally, the maps were considered to be potentially helpful resources. It is clear at a glance where the sites are located, what type of facility they are, types of wastes are accepted, and life expectancies. It is suggested that the Board consider making the maps available to Local Governments and others as a GIS planning tool (in the same manner that contaminated sites information is made available on-line).

A major problem that was identified with the maps is the keys used. It is considered that the maps would be improved if the keys used were consistent throughout; and more consideration was given to the useability of the key if a map is printed in black and white.

2. In contrast to the maps, the manner in which tables in the report present information could be greatly improved. Considerable information is provided, but not in an overly usable manner. For instance, the tables that provide information on facility features (such as fencing and staff) provide no corresponding details on where the sites in question are located. As such, in terms of using this information to develop an infrastructure plan in a state as large as Western Australia, these tables are of little

use. It is noted that the maps rectify this situation to some degree. However, not all the information presented in the tables is translated to the maps.

It is suggested that the information contained within the report requires serious review; with the intention that all information presented in the report should be made readily useable. In most instances, it is suggested that the information presented should clarify the region and type of facility the information applies to. Table 22¹ is identified as including all such relevant information, and could be used as a general example of how information in the report could be better displayed.

Recommendation 4: That the Board consider providing the final waste infrastructure maps (minus confidential information) on-line as a freely available planning resource.

Recommendation 5: That a review of the information presented within the report be undertaken with a view to ensuring all information presented is useful for the purposes of waste infrastructure planning. That is, it should be clear to which region and facility type any information provided applies.

¹ Table 22 is an example of where the location and type of facility are made clear. However, it should be noted that Table 22 is also criticised for not converting cubic metres into tonnes and then using an incorrect representation of cubic metres (m² is used).