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WARR Regulation Amendments  
Waste Avoidance and Resource Recovery  
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27 May 2019

Dear Sir/ Madam

**Re: Approved methods for mandatory reporting under the Waste Avoidance and Resource Recovery Regulations 2018**

Thank you for the opportunity to provide feedback on the *Approved methods for mandatory reporting under the Waste Avoidance and Resource Recovery Regulations 2008*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body for all stakeholders in the waste and resource recovery industry. We have close to 2,000 members across the nation, representing a broad range of business organisations, the three tiers of government, universities, and NGOs.

Our members are involved in a range of important waste management and resource recovery activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residual waste.

WMRR acknowledges the importance and necessity of tracking and keeping accurate records, as well as developing robust and accurate data, which will play a key role in long-term planning for the industry, and WMRR awaits the release of the Department's forthcoming Waste Data Strategy.

As such, WMRR is broadly supportive of the proposed amendments to require reporting of waste and recycling data from non-metropolitan landfills, local governments, and recycling and reprocessing facilities, but also seeks clarity around how the Department intends to use this data in its Waste Data Strategy as well as in its policy and program development. Additionally, WMRR recommends that more frequent data capturing be considered for example, ideally online, quarterly reporting to enable better and more accurate data capture that takes into account trends in waste management and resource recovery.

WMRR also queries the discrepancy between the liable landfills and liable recyclers methods, specifically why reporting is required to be undertaken by recycling and reprocessing facilities with an output of more than 1,000 tonnes per annum, while only non-metropolitan landfills that receive more than 20,000 tonnes per annum are required to report their data. If DWER maintains this 20,000-tonne limit for non-metropolitan landfills, it is more than likely that few, if any, landfills would be required to report their tonnages. To ensure the best tracking and data collection outcomes, for consistency, and to ensure this does not become a box ticking exercise, WMRR recommends lowering the 20,000-tonne limit to 1,000 tonnes, in line with the liable recyclers methodology. Further, WMRR recommends requiring non-recyclers to submit mandatory annual reports and in doing so, to consider how it can and should clarify the definition of liable entities in the liable recyclers method to include other processors and generators of materials.

**Reporting format and material categories**

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#### 1. Local governments

WMRR does not agree that the annual Local Government Waste and Recycling Census template is an appropriate reporting template for DWER's mandatory reporting program. The latter should in fact, reflect kerbside contracts; this would have the added benefit of providing valuable insight into the impacts of the container deposit scheme on materials such as PET, aluminum, and glass.

While the proposed material categories are a good start, WMRR recommends that some of these categories be further expanded given recent developments in CDS, global markets, China (National Sword) and the Basel Convention, including:

- Plastics: to be broken into PET, HDPE and mixed plastics.
- Metals – ferrous: to assign aluminum its own category.

WMRR also suggests adding a requirement for local governments to report on litter and illegal dumping as there is currently a lack of consistent data, which lends to the challenge of accurately determining the scale of the issue and subsequently, the effectiveness (or ineffectiveness) of ongoing programs.

#### 2. Liable recyclers and liable landfills

The proposed data recording format currently requires this section to be filled with the general fate of materials, e.g. "recycled", and general destination, e.g. "Perth metropolitan" or "exported". As this is intended to be a mandatory reporting exercise, it would be advantageous for the purposes of tracking, data collection, and record keeping, to require industry to provide details such as the country, business name, and site (geographical location/address) that materials are being sent to, in addition to the fate of the materials (e.g. recycled, treated, landfilled, etc.).

Granularity is also sought for the material categories and similar to WMRR's recommendation above, these categories should be expanded, including:

- Plastics: to be broken into PET, HDPE and mixed plastics.
- Metals – ferrous: to assign aluminum its own category.

### **Proposed calculation methods**

#### 1. Local governments

WMRR queries how DWER determined the default 45% residual rate under section 6.2. This rate would appear to reflect that State's diversion rate, which is not an accurate reflection of a facility's diversion rate. It also reflects that not all councils are able to divert and is not the reality of those that are diverting.

Turning to point 6.5 on recycled materials, WMRR encourages DWER to consider tracking where materials are recycled and the volumes that are recycled, considering the current market trends and challenges. At present, the proposed way that each material recycled is estimated, is in reality, not linked to how much or where materials are actually recycled.

#### 2. All methods

Further clarity around the reporting requirements for, and definitions of stockpiles is required to ensure accurate collection of data, including whether information is required to be reported on both processed and unprocessed waste.

### **Proposed material densities**

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1. Local governments

Apart from mixed dwellings and trade waste, councils do not provide extensive C&I waste services. With this in mind, WMRR is seeking clarification on how C&I waste and recycling will be tracked.

2. Liable recyclers

As the goal in determining the source waste stream is to reconcile the movements of waste, WMRR recommends that DWER also captures data around the suppliers of materials, not just waste generation and transportation details.

3. All methods

WMRR is also seeking clarification around the proposed material densities for all three proposed methods. These figures were obtained from a range of sources, including the UK and while WMRR acknowledges that at present, that is no nationally agreed list of waste densities to convert volume measures to weight, the Department should use the WA Waste Authority's guidance note on converting volumes to tonnes for consistency.

**Barriers to using calculation methods and reporting**

WMRR would urge the Department to ensure that this annual reporting exercise does not become an overly onerous initiative that causes significant disruption and/or cost. Key to the success of this program is the Department's online reporting system which it is currently developing and WMRR would encourage the Department to complete its design and testing well ahead (minimum 12 months' notice) of the 1 October 2020 report submission deadline.

A communication and education program to assist recyclers, reprocessors, landfill operators, and local government with the changes and requirements is also necessary.

Greater consistency in terminology is also required across all three methods, including but not limited to the use of terms such as financial year versus annually, tonnes versus tonnes per annum.

Finally, WMRR recommends including a review mechanism in the approved methods, which could be aligned to the review mechanism used in the *Approved Manner for the WARR Levy* requirements for liable entities.

Please do not hesitate to contact the undersigned if you would like to discuss WMRR's discussion. Thank you.

Yours sincerely



Gayle Sloan

**Chief Executive Officer**

Waste Management and Resource Recovery Association of Australia

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