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Enquiries: Mr Brice Campbell

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Dear Mr Rowe

RE: APPROVED METHODS FOR REPORTING UNDER THE WASTE AVOIDANCE AND RESOURCE RECOVERY REGULATIONS 2008

The City of Armadale thanks the Department for the opportunity to provide comment on the draft approved methods for reporting under the amended *Waste Avoidance and Resource Recovery Regulations 2008*. As a Local Government and operator of two licenced facilities (Roleystone Greenwaste Facility and Armadale Landfill and Recycling Facility), the City of Armadale plays dual roles in the management of waste and recycling. While the City welcomes mandatory reporting for all entities involved in waste management, the City has some concerns which are detailed below.

Duplication of Reporting

Currently the City provides the Department of Water and Environmental Regulation (DWER) with the following reports on a regular basis:

1. Landfill Levy Returns with support documentation (Quarterly);
2. Annual Environmental Reports (AER) and Annual Audit and Compliance Reports (AACR) (Annual); and
3. Local Government Census (Annual).

As detailed above, the City is already providing the DWER with multiple datasets which serve the same or similar purposes as the proposed approved methods for reporting. Adding another requirement for reporting is onerous on the City and does not offer significant benefit to the DWER.

The approved methods are an opportunity for the DWER to reduce the regulatory impact on Local Governments while ensuring that accurate data is provided in a timely manner.

Recommendation – That the requirement to report weight data in the AER and AACRs be removed, and the Local Government Census reporting ceases when the approved method is introduced.

Low volume/transient waste types

Many types of waste material received at the Armadale Landfill and Recycling Facility are received in low volumes or at random intervals such as reinforced concrete, large tree trunks or deceased animals. Under the proposed survey methodology, these materials are not likely to be received at the facility during the four week-long periods proposed to determine the source of this material.

These low volume and/or transient materials could be categorised into waste source by using a similar waste type such as concrete and bricks for reinforced concrete or organics – garden organics for large tree trunks. Where no similar waste type exists such as deceased animals, a default category could be used.

Recommendation – That low volume or transient waste categories be assigned a waste source based on similar material received at the facility or, where no similar category exists, a default category be used.

Mixed waste streams where material recovered

The Armadale Landfill and Recycling Facility have long been at the forefront of encouraging its patrons to sort their material onsite to maximise resource recovery. For instance, tip passes can only be used for sorted loads and paid loads can choose to sort their material for a reduced fee. This encourages customers to sort their loads into various categories resulting in a reduced fraction of the material then being sent to landfill. The current City of Armadale calculation used from weighbridge data is 30% to landfill. The proposed method uses 45% to landfill for mixed loads.

The City also processes a number of materials onsite in order to maximise recycling such as separating glass and aluminium found in outdoor furniture and windows. The proposed methods are not clear on how this material is to be categorised and reported.

Recommendation - That mixed waste streams which are sorted onsite into various categories and materials processed onsite for recycling be considered when finalising the approved methods.

Some materials such as bricks and concrete are collected and stockpiled together onsite. The reporting methods require that these materials are reported separately. This may also affect sites which only collect a limited volume of a particular material such as metals. Some sites will separate metals into different types where it is financial viable to do so, other will collect these together as mixed metal for further processing off site. The material categories need to be flexible to reflect the site specific operations, including mixed waste streams and allowing reporting to different levels within the categories.

Recommendation - That mixed waste streams and reporting based on a material hierarchy be included in the approved methods.

Service Cost

Included in the draft approved methodology is the requirement for Local Governments to provide information on the cost of each service it operates. The City is concerned that this financial data, along with the weight and volume data provided will enable third parties to calculate contract pricing. The supply of detailed data surrounding services could result in damage to either the City's interests or the interests of their Contractors.

The structure of contracts varies from contract to contract as each service contracted can contain different contract terms. Examples of this include the following:

- Kerbside collection contract
 - When ownership of the material changes from LGA to Contractor;
 - Service levels within a contract i.e. when a missed service will be collected by;
 - The requirement to operate a call centre;
 - Age of the vehicles in the contract; and
 - Length of contract.

- Verge Collection
 - Distance to disposal location;
 - Types of material collected;
 - Method of collection; and
 - Geographical or location specific changes – hills, distance between service points etc.

The above is only a small sample of the various differences in contracts which will affect the overall cost of service. This makes comparing services across Councils difficult and renders any comparison without considering the above in accurate or misleading.

Recommendation – That the requirement to provide financial information based on individual services offered be removed from the Approved Methods.

Compliance with new regulations

The Department is proposing that the new methods are gazetted on 1 July 2019 with the first reporting period also starting on 1 July 2019. This does not give facility operators sufficient time to implement the required changes based on the final version of the approved methods.

This is hugely unfair and the Department should give facilities at least 3-4 months to ensure that they are compliant with the new approved methods.

Recommendation – That the start of the approved method is delayed to allow affected parties to implement required changes and reporting structures.

Consultation and amendment timelines

While the City appreciates the Department allowing consultation on the approved methods, the timelines set by the Department includes less than 5 weeks between the end of the submissions period on 27 May 2019 and being gazetted on 1 July 2019.

The City is of the view that there is not enough time for the Department to sufficiently consider the submissions, incorporate any required changes and to notify affected parties prior to 1 July 2019.

Recommendation – That the start of the approved method be delayed to allow the Department sufficient time to consider submissions and to provide enough time to allow affected parties to implement required changes and reporting structures.

Should you require any further information on the above, please do not hesitate to contact Mr Johan Le Roux, Manager Waste Services on 9394 5303, 0417 180 045 or jleroux@armadale.wa.gov.au.

The City looks forward to the Departments' consideration and response regarding the concerns raised by the draft approved methods for reporting under the amended *Waste Avoidance and Resource Recovery Regulations 2008*.

Regards



Johan Le Roux
MANAGER WASTE SERVICES