

Submission on Proposed Estimation/Calculation Methods for Local Governments under Proposed Amendments to the *Waste Avoidance and Resource Recovery Regulations 2008*

1. Item 3 – Reporting Period – Comment: this requirement can be met;
2. Item 4 – Reporting Format – Comment: whether paper or paperless this requirement can be met within current staffing levels;
3. Item 5 – Material Categories – Comment: the expanded list of material categories can be reported against but will be estimated as the Shire does not have the resources to properly assess the categories accurately;
4. Item 6 – Comment: the minimum population thresholds are too low and the special provision threshold should be lifted to less than 10,000 persons – refer to comment in point 7 (item 9);
5. Item 7 – Source waste stream – Comment: this item can be met;
6. Item 8 – Default Values – Noted;
7. Item 9 *Special Provisions for Local Governments with a population of less than 5,000* – the threshold level for small populations is set at 5,000 in the discussion paper. However to meet the departments requirements and be consistent with other DWER initiatives and programs this population level should be raised to less than 10,000 for local government.

Example: The CDS (Container Deposit Scheme “*Minimum network standards: Refund point locations and hours of operation*” document in the table in section 1.1 – Minimum regional representation and refund point to population ratios lists major regional centres as those with a population threshold of 10,000 or more.

On that basis, and for DWER to be consistent across the state, in regional areas and within the department itself the population threshold should be raised from 5,000 to less than 10,000 persons for reporting purposes.

Additionally the extra workload placed on small local governments in order to meet the requirements for waste reporting, to be accurate, would require additional staff time or an extra full time/part time employee. The cost benefit ratio would not justify additional staffing for this Shire (Shire of Narrogin).

Gathering, collating information and reporting on waste generation rates and material categories in metropolitan centres with large populations would be at the same cost as a small local government, however economies of scale with a larger number of households essentially means the cost is less per household and easily achievable. It is noted that most urban local authorities currently have a population level of around 30,000 or more. It could even be argued that this level of population should be the threshold. If that were the case, for example the Shire of Northam with a population of 11,000 has a town population of 6,000.

Furthermore, in the farming regions the majority of the farms dispose their waste on-farm. For example in the Shire of Narrogin the population of the townsite is less than 5000, at about 4,400 with about 800 people residing on farms, and therefore could potentially fall under the 5,000 population threshold, should the criteria be changed. It is recommended that the Department investigate the issue of the threshold further to

provide an accurate outcome. At present the majority of the people who use the Narrogin Waste Facility are from town with only a very small proportion of users from rural areas. Alternatively there should be two (2) thresholds, one for metro areas and one for rural categories.

The Shire of Narrogin is a relatively small Shire by Western Australian standards in both area and population. Residents of the town often complain of the cost of rates levied for each property. The Shire is conscious of costs, particularly the rates charged. At the workshop it was reported that the average cost for a kerbside collection (Perth) was around \$200.00. For the Shire of Narrogin current charges for a kerbside pick-up is \$226 which is about 13% higher than the reported average of \$200.00.

Population Growth – The projected population growth/decrease as predicted by the ABS shows that the Shire of Narrogin can expect static or very slight population growth (1%) over the coming years. This population trend is in line with other wheatbelt communities, with population levels in decline over time, with a very low level of population growth, if any in small regional areas. This anticipated low level of growth will impact on small local governments in regional areas and impact their ability to raise revenue.

8. Item 10 – Comment: the special provisions for local Governments with a population of less than 1500. The population figure for this requirement should be lifted to those local governments with a population of less than 10,000. Refer to point number 7 (item 9)
9. SUMMARY: This submission argues that population thresholds should be consistent within DWER for all reporting requirements. It is proposed that the population threshold should be set at:

OPTION 1

- A) Local authorities with a population of less than 10,000; and
- B) Local authorities with a population greater than 10,000

OPTION 2

Set the population threshold for the size of the town who are the main users of a waste facility, particularly in rural areas; or

OPTION 3

Set the population threshold based on whether the local authority is metro or rural