



Western Australia Branch

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Submission on Consultation paper: Proposed Amendments to the WARR Regulations 2008 to Require Record-keeping and Annual Reporting of Waste and Recycling Data

The Association appreciates the opportunity to comment on the Consultation Paper regarding proposed requirements for the waste management industry to keep records and report annually on waste and recycling data. The waste management industry understands the importance, for the State Government, of receiving accurate data to report against the targets in the State Waste Strategy and to inform the development of specific Programs focusing on key waste streams. In 2014, through the Strategic Partnership with the Waste Authority, the Association held a workshop on improving waste management outcomes through improved data capture. The discussion at this workshop has been used to inform this Submission.

General Feedback

Reporting data comes at a cost to industry, through staff time and resources needed to undertake the activity. Currently Licensed premises are already providing some information to the Department of Environment Regulation through their licencing reporting. Frequently this information is similar to what is outlined in the Consultation Paper, covering annual material throughput for example. The Association understands that there are limits to what data can be requested through this process – therefore the additional data requirements cannot simply be added to existing licenced premises. However, requests for information should not be duplicated.

Recommendation: The Department remove the duplicate requirement for annual reporting from the licence conditions of facilities which are reporting through the WARR Regulation Process.

To date there has been limited engagement with industry to on the rational for data provision. At the 2014 Workshop it was identified that there was a need for the goals and purpose attached to data collection to be more clearly articulated and communicated to the industry. This would encourage participation in data collection activities, rather than needing to require reporting. In addition to online portals and reporting, regular face-to-face stakeholder forums could help improve participation and make data collection more purposeful and valuable for people in the industry.

Recommendation: That the Department of Environment Regulation, prior to introducing compulsory reporting, directly engage with the waste industry to explain, specifically, what the data collected from industry will be used for.

The Association is keen to facilitate the discussion with specific industries regarding the methodologies and barriers to reporting. It is therefore suggested that the Association could organise focus group sessions prior to the development of draft methodologies to inform the process. Rather than only having the opportunity to react to the draft methodologies once they

WMAA is the peak body for the waste and resource recovery industry

have been released. The industry has specific knowledge on what approaches to data collection are currently being used and the barriers to accurate reporting.

In relation to the consultation on methodologies the Association requests the Department understand the substantial effort that is required to provide feedback on both the regulatory reform documents and any additional documents regarding methods of reporting. It is important that a reasonable timeline for consultation is included.

Recommendation: The Department of Environment Regulation undertake consultation with the various industry sectors prior to the development of data collection methodologies.

Question 1: Are the definitions for liable entities sufficiently clear and understandable for your organisation to determine if it is required to report? If not, what further clarification would be helpful?

The Association suggests that a clear list of the type of Licenced Premises, under Schedule 1 of Environmental Protection Act (EP Act), should be included to guide those required to report. For those not included under Schedule 1, a separate point should be included. The current definition is very broad and it is questioned how these premises, if they are not licenced under the EP Act, will know that they need to report.

Question 2: Are the indicative reporting requirements sufficiently clear for your organisation to determine what type of information it is required to report? If not, what further clarifications is required?

The reporting requirements were considered to be relatively clear.

Question 3: Are there any barriers to the recording or reporting of these types of data for your organisation? If so, what are they?

Barriers identified included the need to update existing weighbridge software to capture this information, which would come at a cost to the operator.

Question 4: Based on the indicative reporting and data requirements in the Paper, identify any guidance that is likely to be most useful to your organisation.

The guidance requested included processing loss calculations for all types of operations.

For further information please contact Rebecca Brown [REDACTED] or [REDACTED]

Yours sincerely

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