

# CENTRAL COUNTRY ZONE

Container Deposit Scheme  
Department of Water and Environmental Regulation  
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To whom it may concern

## **Customer Service Standards for Collection Network - Container Deposit Scheme – Submission from the Central Country Zone of WALGA**

I write in my capacity as the Executive Officer to the Central Country Zone of WALGA (the Zone) which represents the following 15 local governments:

- Shire of Beverley;
- Shire of Brookton;
- Shire of Corrigin;
- Shire of Cuballing;
- Shire of Dumbleyung;
- Shire of Kulin;
- Shire of Lake Grace;
- Shire of Narrogin;
- Shire of Pingelly;
- Shire of Quairading;
- Shire of Wagin;
- Shire of Wandering;
- Shire of West Arthur;
- Shire of Wickepin; and
- Shire of Williams.

Shires of:  
Beverley  
Brookton,  
Corrigin  
Cuballing  
Dumbleyung  
Kulin  
Lake Grace  
Narrogin  
Pingelly  
Quairading  
Wagin  
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West Arthur  
Wickepin  
Williams

Member Councils of the Zone welcome the proposed introduction of a Container Deposit Scheme (CDS) and look forward to being an active participant in establishing the scheme. As part of developing its approach to the CDS the Zone considered the Customer Service Standards for Collection Network consultation paper at its meeting on Friday 30 November 2018.

It is noted in the CDS document that the preferred option is comprised of a full-time refund point for every 20,000 people as an overarching target, subject to:

- one full time refund point for major regional centres with a population between 10,000 and 20,000;
- at least two full time refund points for major regional centres with a population over 20,000; and
- a population threshold of 500 for a flexible refund point.

An alternative option is considered which varies from the preferred option by providing a full-time refund point for every 15,000 people in lieu of 20,000 people, all other criteria remain the same.

The Zone in reviewing the above options noted that there are no full time refund points in the Wheatbelt and only 27 flexible refund points. Given the size of the Wheatbelt at more than 150,000 km<sup>2</sup> it was considered by Member Councils that neither option provides an adequate customer service to the communities that make up the Wheatbelt Region.

In reviewing the methodology for the two options presented in the CDS document, it is noted that the CDS has ignored a considerable number of local governments by using population figures based on townsites, rather than the total for the local government district. Effectively local governments with a number of

townsites or with residents who live outside a townsite are disadvantaged as they seem to receive no recognition for service under the CDS.

Whilst the Zone understands the difficulty in balancing the number of refund points at a reasonable scheme cost, there is however concern that many of the local governments in the Zone and more broadly across the Wheatbelt have no proposed collection point. It follows logically that if residents in affected local governments are unable to easily access a refund point, they may be inclined to place their containers in landfill, thereby negating the intent of the scheme.

A good example of the impact this will have is the Shire of West Arthur. The Shire of West Arthur is located in the south west of the Wheatbelt region with a district population of over 800 people and an area of 2850 km<sup>2</sup>. Darkan is the administrative centre and there is no refund point listed in Appendix 8 of the CDS for this location. The Shire of West Arthur has a district population greater than the 500 threshold and based on the criteria, if district populations were being used, instead of townsite population this would have entitled the Shire of West Arthur to a flexible refund point.

Interestingly in Appendix 8 it is noted that Bakers Hill, Wundowie and Wooroloo have been combined into a single collection point when in fact based on the criteria Bakers Hill and Wundowie would each have been entitled to a refund point. Given the proximity of Wooroloo to the metropolitan area it is likely that residents would have easy access to a full time refund point. The use of a combined population in this case demonstrates that using a district population is practical.

Turning to the issue of distance, it is noted that it is proposed to use a maximum travel distance of five kms for metropolitan areas, 50 kms for inner regional areas, 100 kms for outer regional areas and 200 kms for remote and very remote areas. The travel distance for the Zone and Wheatbelt would be classified as outer regional areas in that there should be a collection point within 100kms.

An analysis of the CDS service standard noted that within the Wheatbelt only 27 of the 42 local governments are recognised in the report and flexible refund sites are only proposed for 23 Wheatbelt local governments.

Given that not every local government will have, as a minimum a flexible refund point, it is difficult to see residents travelling up to two hours (one hour each way) to access a refund point. Whilst on many occasions this travel could be combined with other activities such as shopping or sporting activities the likelihood of the collection point being open could be problematic.

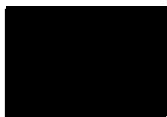
The CDS should acknowledge that many small local governments provide relatively comprehensive, albeit small scale, waste management facilities and as such it may be more practical for a type of agency arrangement to be established for small collection sites so that it is able to conduct smaller collections within the overall CDS collection network.

The lack of easily accessible refund points could significantly reduce the positive impacts of the CDS in the Wheatbelt. It is likely that the opportunity costs to collect, store and transport containers to a collection point a distance of possibly 100 kms from a person's residence will outweigh the financial return of participating in the CDS.

The Zone trusts that based on community feedback the methodology will be improved to allow residents across the Wheatbelt to participate fully in the CDS.

Should you wish to discuss this further please do not hesitate to contact me.

Yours faithfully



**Bruce Wittber**  
Executive Officer

5 December 2018