

EASTERN METROPOLITAN REGIONAL COUNCIL RESPONSES TO

REVIEW OF THE WASTE LEVY CONSULTATION PAPER

JULY 2020



Written submissions to be lodged by 15 July 2020 at:
consult.dwer.wa.gov.au/waste-policy/review-of-the-waste-levy/

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1. EXECUTIVE SUMMARY

The Eastern Metropolitan Regional Council (EMRC) welcomes the opportunity to comment on the Review of the Waste Levy Consultation Paper released by the Department of Water and Environment Regulation (DWER) in February 2020 (Consultation Paper).

EMRC's submission concludes that there is an opportunity to make some changes to the way the Waste Levy is charged, collected and administered. A key recommendation of the EMRC is that there should be greater transparency and hypothecation of funds raised through the waste levy to effective waste management entities, such as the EMRC. This will allow such entities to facilitate leading edge, strategic waste initiatives that lead to greater resource recovery and recycling initiatives and the creation of a true circular economy.

In particular, the EMRC recommends that:

- increases be made to the level of hypothecation of funds raised through the waste levy to invest in and facilitate strategic waste outcomes;
- regional local governments should be afforded access to a portion of the collected levy funds to address emerging waste management innovation; and
- according to some of our member Councils the timing for any potential increase in the waste levy be delayed until after 2025, to align with the implementation of the third bin in metropolitan WA, to support the removal of organics from the general waste stream.

2. INTRODUCTION

Local governments have traditionally had the responsibility for waste management within their local areas, as prescribed under the regulatory framework of each State.

Over the past 37 years, this function has been managed very successfully in metropolitan Perth by regional councils such as the EMRC, which has proven to be an integral element of waste management services within metropolitan Perth. This is particularly so because of its expertise in:

- management and coordination of household waste;
- resource recovery and recycling services;
- managing and operating of landfill sites;
- delivering education and awareness programs; and
- providing and maintaining waste management infrastructure

The EMRC has also collaborated effectively with a range of industries and businesses in waste management and resource recovery, as well as having worked with:

- its member local councils;
- other regional councils such as Western Metropolitan Regional Council; Rivers Regional Council, Mandarie Regional Council and Southern Metropolitan Regional Council; and
- wider stakeholders, including private waste management companies, consultants and peak industry bodies, to deliver improved waste and resource efficiency outcomes.

The EMRC is committed to long-term planning for effective waste management. Access to the funds raised through the application of the waste levy will assist proactive regional councils, such as the EMRC, to deliver best practice waste initiatives for the benefit of residents in Perth's eastern region and the wider metropolitan region, as well as the environment.

It should also be noted that access to levy funds or increasing the levy should not be used in isolation as the sole action to address diversion from landfill, waste management issues and to achieve the State's Waste Strategy 2030 targets.

3. CONSULTATION QUESTIONS

3.1. Chapter 2

Q1 Are there any beneficial outcomes that can be achieved by a levy beyond those identified in the objectives of the Waste Strategy 2030?

The waste levy should be utilised to incentivise the minimisation of waste which in turn will protect our environment and create a more sustainable, low-waste, circular economy. A portion of the levies collected should be directed towards education on waste avoidance, recovery, reuse, reprocessing and recycling (the top five preferred options in the waste hierarchy). The lowest option in the waste hierarchy, disposal, should continue to be levied in order to achieve the state's recovery target of 75% by 2030. Funding should also be directed to develop onshore downstream processing and markets for dealing with resource recovery including large-scale food organics and garden organics (FOGO) facilities; plastics processing, cardboard and paper milling and opportunities to deal with household hazardous waste materials and contaminated soils.

A portion of the waste levy collected should also be hypothecated to entities such as the EMRC, to identify and implement alternative waste treatment technologies. The EMRC submits that the provision of levy funds would enable it to pursue waste treatment options, such as the introduction of FOGO collection and processing. This would enable the EMRC to contribute further to the achievement of the State's Waste Strategy 2030 objectives.¹

Local governments via their participation in regional local governments, such as the EMRC, represent the largest sector contributing to the payment of the waste levy. In 2018–19, \$77.57 million in waste levies was collected. There were 32 landfill premises monitored in relation to the waste levy, the majority of which were in the Perth metropolitan area. The disposal of reported metropolitan waste to non-metropolitan landfill facilities increased from 44 per cent of total waste disposed of to landfill in 2017–18, to 46 per cent of total waste disposed in 2018–19. Such waste facilities remained liable for payment of the waste levy, which was received on the due dates.

Additionally, regional local governments represent a great collection of local governments. As a result of their geographical reach, regional local governments can have a far-reaching impact in creating sustainable solutions to waste management which will offer greater benefit to the Western Australian economy and the community. Regional local governments also provide greater economies of scale, and are focussed on long term sustainable solutions to Western Australians with the significant benefit of not being subject to short term profit and shareholder wealth maximising objectives.

Greater funding, via the waste levy, should be apportioned to regional local governments such as the EMRC to provide innovative, sustainable solutions which are aligned to the objectives of the Waste Strategy 2030. Since the inception of the waste levy in 1998, the EMRC has contributed \$111,591,602 through honest and ethical accounting, reporting and on-time payments to the DWER in accordance with the *Waste Avoidance and Resource Recovery Regulations 2008* (WARR Regulations).

3.2. Chapter 3

Q1 Are there any other strengths or weaknesses of a waste levy as an instrument for achieving the objectives of the Waste Strategy 2030?

The EMRC considers that the following are the strengths of the waste levy:

- by applying the waste levy across the State, it will encourage solutions aligned with the waste hierarchy, the Waste Strategy 2030 and act as a deterrent to landfilling materials which can be recycled or otherwise re-used;
- the Waste Strategy 2030 focusses on materials recovery as a higher preference to energy recovery. In fact, the Strategy specifies that from 2020 only residual waste can be used as feedstock for waste to energy. Non-residuals, such as recyclables and organics need to be recovered and utilised as secondary raw materials to ensure a circular economy can be achieved. Therefore the addition of a waste levy on energy recovery for non-residual waste or

¹ Waste Authority of Western Australia, *Waste Avoidance and Resource Recovery Strategy 2030* (October 2019), page 29.

recyclables, such as on waste to energy (WtE) facilities, will assist the State to achieve the objectives of the Waste Strategy 2030, as it will encourage the use of materials which cannot otherwise be recycled to produce energy, rather than that material being landfilled. Applying a waste levy should be based on whether a comprehensive collection system is used (three bin FOGO system) or a 'dirty MRF', ensuring waste that is not source separated still has recyclables and organics removed before final disposal to WtE or landfill.

- However some of our member Councils have requested that the timing of this needs to be reconsidered until after 2025 when all metropolitan councils will have implemented their three bin system;

The EMRC considers that the following are weaknesses of the waste levy:

- the levy is a blunt instrument and a large portion is directed to the State Treasury rather than back to the waste management sector. This lack of distribution of the funds collected from the accumulated waste levy flowing through to entities such as the EMRC will stifle other cost prohibitive capital projects to undertake other waste initiatives that will assist the state in achieving the state waste target of 75% recovery by 2030; and
- the limitation of just using a waste levy to achieve the WARR targets triggers all kinds of market responses (mostly negative) and creative evasion methods as we have seen over the past decade, for example disposing of waste in unlevied regional landfills, stockpiling and illegal dumping.

The EMRC recommends the following to improve the application of the waste levy:

- there should be mandatory use of weighbridges by all waste management and resource recovery facilities across the State in order to accurately calculate the leviable waste and incentivise waste avoidance, recovery, reuse, reprocessing and recycling rather than waste levy avoidance. The use of weighbridges would also assist in the collection of waste data. Establishing accurate waste data has been identified by the Waste Authority as an ongoing challenge in waste management.² Improved data collection and analysis will better enable the measurement and evaluation of sustainable waste initiatives. This can result in funding and other resources being directed to where they are most needed and can be most effective;
- all landfills should be licenced and regulated under the *Environmental Protection Act 1986* (WA) (EP Act);
- the destination of all waste from all waste generators should be tracked and all waste operators should be licensed in order to accurately capture the amount of waste generated and disposed of;
- the banning of certain waste streams to landfill or WtE, such as separated organics, Garden Organics (GO) and Food and Garden Organics (FOGO) and untreated timber, will enable the transition to a system which is easier to control and oversee; and
- incentivise the source separation of garden organics, food organics and untreated timber materials through appropriate and cheaper options, not simply applying the levy. The residents are largely responsible (source separation) for the success of the right materials being placed in the FOGO and Recycling bins with the residual bin being true residual waste. There is a need for significant education to support a three bin pricing structure, which makes it more cost effective for Councils (and their residents) to prefer Recycling and FOGO over simply using the residual bin. The system should be weighted, (through Government support) to encourage cost effective recycling rather than place the burden of cost through a penalty (landfill levy) at the end of the waste stream. Effectively making source separation a more attractive options rather than applying a penalty or levy.

3.3. Chapter 4

Q1 How has the waste levy benefitted or affected your waste business or operations?

The waste levy is regarded as an impost to the EMRC waste operations especially when the application of the waste levy is not applied equally and fairly across the State. It has led to suspected waste levy avoidance behaviour by some waste operators and anecdotally this has been mentioned by waste operators to the Minister at an industry breakfast two years ago, that they had participated in practices to avoid paying the levy. It has burdened organisations such as the EMRC which is focussed on long term sustainable and socially responsible outcomes for the community.

² Waste Authority of Western Australia, *Waste Avoidance and Resource Recovery Strategy 2030* (October 2019), page 12.

The levy has affected the EMRC's landfill operations whereby commercial waste, generated in the metropolitan area has been disposed of at non-metropolitan landfills to avoid paying the levy. Whilst this has impacted the EMRC we have been actively expanding our resource recovery operations with the development of the Hazelmere Resource Recovery Park, where only residual waste which could not be recycled or recovered was diverted to landfill and thereby attracted the levy.

Recent events such as the collapse of commercial operator SKM Recycling which had accumulated significant debts, have highlighted the misalignment of profit-oriented, short-term shareholder wealth objectives with the long-term sustainable outcomes sought by operators such as the EMRC.

Over the life of the waste levy since its introduction in 1998 the EMRC has contributed **\$111,591,602** as a direct result of its successful Red Hill Waste Management Facility.

The waste levy is factored into the overall gate fee charge at the EMRC's Red Hill Waste Management Facility and only applies to landfilled waste. The EMRC acts as a collector of the waste levy and passes it onto the State on a quarterly basis.

Distribution of any of the proceeds of the waste levy by the State back to entities such as the EMRC, however has been minimal in comparison with the significant contribution of the EMRC referred to above. A greater portion of the levy should be hypothecated to regional councils, commensurate with their contributions, to enhance their waste operations in accordance with the waste hierarchy and to achieve the State's waste recovery targets.

The existence of the waste levy however has gradually enabled EMRC to expand into more sustainable practices like timber and mattress recovery, free recyclables drop off at our three community transfer stations and green waste recovery from both commercial operators and our member councils as well as the GO (garden organics) processing and recovery for one of our member council.

Q2 Can you advise of any recycling and waste diversion opportunities that would become viable if the waste levy was increased or applied in a different way? What rate of levy could be required to make these viable?

South Australia³, New South Wales⁴ and Queensland⁵ all currently have levies between \$105 to \$155 per tonne of solid waste. South Australia has the highest rate of resource recovery and recycling rate in Australia.⁶ Its resource recovery rate is 82% and its recycling rate is 78%. Across Australia, the average resource recovery rate is 62% and the recycling rate is 58%.⁷ The EMRC supports national harmonisation of levies to create clarity, a national approach to sustainability and a level playing field. An incremental increase to \$140 per tonne over a 10-year period from the current WA landfill levy of \$70 per tonne would help achieve this alignment. There needs to be a 10-year schedule which outlines the State's planned increases in the waste levy and when the increases will occur, to act as guidance and investment certainty for the sector, such schedule to come into effect after 2025.

The application of the waste levy to PFAS contaminated waste and asbestos is an example of where an exemption from the levy should prevail because of the environmental benefit of these materials being disposed of safely in a licenced landfill as opposed to illegally dumped or stockpiled. This should apply in particular to State Government bodies such as the Public Transport Authority, Department of Fire and Emergency Services and also to the remediation of

³ The waste levy for solid waste is \$140/tonne in metropolitan Adelaide and \$70/tonne for non-metropolitan areas. See Environmental Protection Authority (South Australia), *Waste Levy* (5 June 2020) < https://www.epa.sa.gov.au/business_and_industry/waste-levy >

⁴ The waste levy for solid waste is \$146/tonne in metropolitan areas and \$84.10/tonne for non-metropolitan areas. See Environmental Protection Authority (New South Wales), *Levy regulated areas and levy rates* (15 May 2020) < <https://www.epa.nsw.gov.au/your-environment/waste/waste-levy/levy-regulated-area-and-levy-rates> >

⁵ The waste levy for regulated waste category 1 is \$155/tonne and for waste category 2 is \$105/tonne. There are separate levy rates for treated timber shavings, contaminated soil and other leviable waste. See Queensland Government, *Levy Rates* (30 January 2020) < <https://www.qld.gov.au/environment/pollution/management/waste/recovery/disposal-levy/about/levy-rates> >

⁶ Department of Environment and Energy, *National Waste Report 2018* (19 November 2018) page 26.

⁷ *ibid.*

Commonwealth land. The exemption for the payment of the waste levy on asbestos containing material is generally accepted and applied in States including South Australia⁸ and Western Australia.⁹

Q3 Please provide information on potential impacts which may result from increasing the waste levy?

Impacts which may result from increasing the waste levy include:

- decrease of waste generation;
- operational efficiencies within the waste industry to reduce costs associated with the waste levy;
- more waste levy funds available for reinvestment in the waste sector;
- more investment and jobs in the waste sector;
- more material available for recycled content to replace virgin raw materials;
- landfill rationalisation due to less waste available resulting in an uneconomical volume;
- potential stockpiling of waste materials if the levy is not applied to waste stockpiled for longer than 12 months as suggested in the DWER's 'Closing the Loop' consultation paper; and
- levy avoidance through illegal dumping.

Q4 If you knew when the waste levy was going to be varied, how would it affect your decisions about managing waste or related investments?

The EMRC has always been cognisant of the fact that the waste levy falls under the jurisdiction of the State government and like any government fee or charge, it can be varied with the approval of the Minister. In order to plan ahead and budget for levy changes it would be beneficial if government could prepare a 10 year plan, much like local governments prepare their 10 year financial plans for the future of their districts. Further, as the EMRC only acts as a collector of the state waste levy and passes it on to the State on a quarterly basis, collecting and paying the levy has no material impact on the EMRC's investments.

The introduction of a true waste levy (not just landfill) would be a different matter, however. This would impose additional costs on operations that had not been previously planned for and would mean that the EMRC would have to reconsider how it manages its waste operations going forward. An example of this would be if the State imposes a levy on energy recovery, such as WtE facilities. This is because WtE is a new part of the EMRC's business model that has not been modelled to be subject to a levy at this stage. The EMRC would need to do more extensive modelling around the viability of all its waste operations to ensure it remained viable and relevant, whilst at the same time being sustainable. If a levy is proposed for WtE facilities, then the EMRC recommends that a further consultation occur so that waste operators can have input in to how the levy applies. It should be noted that some of our member Councils oppose the introduction of a levy on WtE.

The imposition of any levy or changes in the rate of the levy will represent a business risk on any medium or long term project. Unlike overseas markets with matured resource recovery markets that support a circular economy, the risk of any new levy or changes to the levy is an impost for market participants if they are unexpected and cannot be planned for. Advance confirmation of when and by how much the waste levy would be varied will provide greater clarity in cost and investment decisions.

3.4. Chapter 5

Q1 How might the Government best balance the need for responsiveness to emerging knowledge about best practice waste management with the benefits of providing the confidence about future waste levy rates?

A planned schedule of changes in levy rates is highly recommended to allow for waste facility operators to better plan, budget and manage any flow-on impacts, such as Council rates.

⁸ Environmental Protection Authority (South Australia), *Waste Levy* (5 June 2020) <https://www.epa.sa.gov.au/business_and_industry/waste-levy>

⁹ Department of Water and Environmental Regulation, *Waste levy exemption – asbestos containing material* (May 2018) <https://www.der.wa.gov.au/images/documents/your-environment/waste/landfill-levy/Wastelevy-exemptionasbestos-containing-material_20180503.pdf>

Further, when considering large homogenous volumes of waste that should only ever be landfilled (such as asbestos and PFAS), the state should give consideration to applications for exemptions, such exemptions to be approved by the Minister and the Director General in consultation with the CEO of the Waste Management Facility.

The EMRC also recommends that the WARR Regulations be amended to set a time limit for making retrospective waste levy exemption applications. This is because currently no time limit is specified within which an application for an exemption can be made retrospectively (that is, after the levy is paid or becomes due for payment). In the absence of a time limit, there is the potential that applications for an exemption can be made many years after the waste was accepted by that facility. This would undermine the collection of waste data, as well as being financially and administratively disruptive.

3.5. Chapter 6

Q1 Are there opportunities for the recovery of regional waste that would be made more viable by a regional waste levy?

At present an unlevel playing field has been created whereby the State imposes a levy on metropolitan landfills but not rural, regional and remote landfills. This has created levy evasion tactics by some waste operators whereby they take waste that was generated in the metropolitan area to landfill sites outside the metropolitan area. We understand (via informal advice from the Minister and DWER) that DWER has increased resourcing to police this practice.

If a levy was applied across the State it would make it more attractive for operators and generators of waste to take a more proactive approach to recover, reuse, reprocess or recycle waste. This would result in better sustainability outcomes and the transition to a circular economy. The size of the levy may need to be adjusted for remote areas rather than just apply one levy across the whole state as discussed below.

Q2 Where are these opportunities most likely to be viable?

Opportunities are likely to be more viable in the peri-urban Councils (such as the Shires of Gingin, Chittering Toodyay, York and the Town of Northam) and the larger regional centres around the State. Small 'Council operated' (and in many cases unmanned) landfills may struggle to provide recovery facilities, but this is something that could be worked through on a case by case basis, perhaps in liaison with WALGA. All commercial operators, regardless of size or location, should be subject to a waste levy if they dispose of waste to landfill or stockpile waste for longer than 12 months.

Q3 What rate of waste levy could be required to make them viable?

The same levy cost should be applied to all peri-urban and larger rural, regional and remote landfill operations with perhaps a 25-50% reduction for smaller waste facilities. This could be done on a pro-rata basis, based on the tonnages collected annually.

Q4 Under specific circumstances, it is possible that an expanded waste levy area could make evasion less financially attractive. How does the cost of transporting waste over long distances compare with the cost of the levy?

At present some waste facility operators/owners and waste generators are disposing of waste without the \$70 per tonne cost being added to the disposal cost at facilities outside metropolitan WA. The same situation may also be applicable if there are unlicensed and unregulated facilities operating within the metropolitan area meaning that the State is not aware of their existence and therefore not applying the levy. A campaign to 'report unlicensed landfills and create a cleaner WA' should be promoted by the DWER and the Waste Authority.

The EMRC has also undertaken some modelling in terms of the cost of transporting waste. The modelling undertaken shows that for a length of 175kms one way (and noting that the return trip is actually 'dead running') totalling 350kms, transporting 90 cubic metre of waste at \$750.00 plus GST per load, and assuming the density of compacted municipal solid waste to be 326 kg per cubic metre, the transport rate equates to \$25.54 per tonne. This is significantly cheaper compared to the current \$70 per tonne waste levy, hence the motivation for avoidance.

Q5 What other advantages or disadvantages could arise from a regional waste levy?

It will allow all owners and operators of waste facilities to be operating on a level playing field where the same waste levy and exemptions apply. It also ensures greater alignment to the objectives of the Waste Strategy across the State by providing an incentive to recover materials rather than paying to landfill them.

The current system creates an unfair advantage to regional landfills with rogue operators allegedly diverting waste generated in the metropolitan area to regional licensed and unlicensed landfills.

An additional advantage would be the potential to rationalise smaller regional landfill sites, establish waste transfer stations for the consolidation of waste and the establishment of larger, regional waste management sites operating best practice activities.

3.6. Chapter 7

Q1 The Waste Strategy 2030 proposes that by 2020, only residual waste will be used for energy recovery. How will this requirement affect your waste management operations?

Four of the EMRC's member Councils, namely the Cities of Belmont, Kalamunda and Swan and the Shire of Mundaring, have signed a waste arising contract with the proponents of the East Rockingham WtE facility. This means that only residual waste will be delivered to the WtE facility. Further the volumes of waste delivered can be adjusted annually based on the EMRC and member Councils waste diversion projects such as the introduction of FOGO processing and a community recycling centre at Hazelmere.

A waste levy imposed on energy recovery may result in it being more expensive to dispose of than waste going to landfill. However, this will also incentivise (a) moving towards a three bin source separation system (FOGO) and (b) minimise the amount of residual (red lid) waste generated through education and avoidance. Should this materialise it may impact how waste is disposed of in accordance with the waste hierarchy; that is, it would drive more recovery from waste. Local government will be incentivised through the appropriate pricing structures assisted by the state government's investment in recycling technologies and projects and the removal of legislative barriers to the effective and innovative uses of by-products of recycling processes.

Q2 Would a waste levy on energy recovery have a different effect on your operations?

A levy on energy recovery will impact the four member Councils who have signed a participants agreement to deliver their residual waste to the East Rockingham facility once it is completed. This will make disposal of waste more costly (depending on the rate of the levy imposed on energy recovery) than landfill disposal at the Red Hill Waste Management Facility. Only NON-residual waste should attract a levy as this is in line with the Waste Strategy 2030, the WARR Act and the waste hierarchy. Again, the local government sector would benefit from an attractive pricing structure that is made less volatile through the targeted intervention of the state government designed to assist the recycling industries across the state. It should be noted that some of our member Council oppose the introduction of any levy on WtE.

The EMRC is cognisant of the fact that its landfill tonnages at its Red Hill Waste Management Facility are set to reduce significantly and is therefore working on boosting resource recovery opportunities and other waste initiatives to ensure the long-term viability of the EMRC.

Further, the EMRC is also acutely aware of the need to work towards achieving the State's Waste Strategy 2030 targets and impose a reduced levy on energy recovery is one of the options to help reach those targets.

If the intent of the State is to impose a levy only on recyclables going to energy recovery and not true residual waste, then it should not significantly impact the EMRC or its member councils. This comment is made based on an audit of Perth's Eastern region's two bin system which indicated that 70% was recyclable. Further only residual waste that cannot go to a higher or better use should be disposed of in a waste to energy facility, such as the one planned for East Rockingham.

Q3 Are there any other waste management options where applying a levy could help achieve the objectives of the Waste Strategy 2030?

Waste and recycling should be considered as an essential service. More emphasis should be placed on public private partnerships (not just left to the market to resolve) where risk and reward are shared and this creates contingencies and integrity of the system as a whole.

Education and other options than landfill and WtE should be promoted to the community. For example, the Waste Wise Schools programme, the inclusion of FOGO to the kerbside collection services and the Roads to Reuse programmes currently run through the Waste Authority of Western Australia. A higher levy would also create more incentive to avoid generating waste in the first place.

The third target of protecting the environment by having best practice facilities by 2030 would be assisted by a levy increase as the sector would be more comfortable to invest in recovery infrastructure. For example, there should be funding for facilities to produce quality materials for which there is a demand eg making pelletised HDPE, PET, PP which can be readily exported and avoid the effect of the China Sword policy.

3.7. Chapter 8

Q1 What other changes to the design or implementation of the waste levy could help make it more effective or efficient in achieving the targets of the Waste Strategy 2030?

The waste levy should be charged at all waste management facilities, including waste transfer stations. Local governments already factor in the waste levy as part of their budget process as they forecast their expected waste streams and the break-down of materials that attract the levy.

These transfer stations would get credits if the material moves out (which it should as the mass balance should be nil). The system would be similar to Goods Services Tax.

If the material subsequently goes to a recovery facility, that site would get charged and receive the credit, if the material is processed within 12 months. Otherwise it should be considered as stockpiling and the levy should be applied to disincentivise this. Waste Management facilities that receive waste subject to the WARR levy should always require charging and passing on the levy as is currently the practice with most landfills.

If councils such as the EMRC who operate a landfill, introduce waste recovery processing, such as FOGO processing, they should receive a rebate on the landfill levy payments to encourage the introduction of such measures and thus contribute to achieving the targets of the Waste Strategy 2030.



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