

Q No.	QUESTION	SUGGESTED RESPONSE
Chapter 2 - Objective of the waste levy		
1	Are there any beneficial outcomes that can be achieved by a levy beyond those identified in the objectives of Waste Strategy 2030?	<p>Yes, its time for Government to review what it does with the levy.</p> <p>The Waste Authority reports states that 25% of the levy is spent to support the industry but most of that is then redirected back to fund DWER.</p> <p>Direct support is the poor cousin, this is grossly unfair when the levy is being paid by the waste and recycling industry.</p> <p>This issue should have been front and centre in this consultation.</p>
Chapter 3 - How the levy can help achieve the objectives of Waste Strategy 2030		
1	<p>Are there any other strengths or weaknesses of a waste levy as an instrument for achieving the objectives of Waste Strategy 2030?</p> <p>If you can provide evidence or more detailed information to support your views, this may help make a stronger case for appropriate action.</p>	<p>The levy has to be fair for it to work and right now it simply isn't.</p> <p>Work done by WRIWA and with which WSM was involved showed that in 2018 -2109 the state collected \$83m in levy while industry could document a further \$93m that was avoided.</p> <p>Who suffered?</p> <p>Firstly it was the very industry, companies like mine, which support and have invested in Waste Strategy 2030 that has been penalised through a regulatory failure that has incentivised avoidance.</p> <p>Secondly how can the state sit back ethically and financially and watch the state being defrauded on such a massive scale?</p> <p>A terrible joke heard in our industry is that how you identify a contractor who is involved in the levy avoidance cartage industry is that they are the ones driving the new shiny trucks.</p> <p>If the levy is not equitable and not equitably enforced then it undermine public confidence in not just the levy but ideas like a circular economy.</p> <p>This needs to be fixed.</p>

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	Chapter 4 - Rate of the levy	
1	How has the waste levy benefitted or affected your waste business or operations	
2	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?	<p>The massive amount of leviabale waste being transported south out of the metropolitan area in order to avoid payment of the levy has made it extremely difficult for companies like ours to trade profitably.</p> <p>WSM is 100% compliant with the objectives of the Waste Strategy 2030 and we are being heavily penalised by levy avoidance.</p> <p>WSM has invested heavily in waste recycling plant and equipment, we have transformed our business from a landfill to a recycling facility.</p> <p>Material entering our site passes through screens, crushers and density separation equipment.</p> <p>Better than 65% of material that we receive is recycled.</p> <p>From Construction and Demolition waste we reclaim sand and soil and we manufacture clean crushed and sized engineering aggregates</p> <p>The question is less what recycling opportunities will become viable than what needs to be done to make the existing recyclers viable?</p> <p>We are not opposed to raising the levy but any rise must include the following:</p> <ol style="list-style-type: none"> 1. It must be state-wide and not restricted to the metropolitan area. 2. The levy must be consistent across the whole of the state, it cannot be less in the regions or the existing levy avoidance industry will continue. 3. It must be enforceable, it is not Ok for government to implement a levy from which government receives a substantial financial benefit without funding compliance. 4. There has to be substantial penalties for levy avoidance, penalties have to be financially greater than the enormous financial benefit from avoidance. 5. This round of consultation cannot be the end of the process, it should be the beginning. We want to see all the key stakeholders involved in active forums to

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		<p>discuss the issues. We cannot afford to get this wrong, its industry like ours that is paying the penalty at the moment.</p> <p>6. The way the levy is reinvested back in the industry has to be reviewed and revised. Its is not 25% as the Waste Authority annual report clearly shows, effectively only 9% is going back into supporting the industry.</p> <p>7. We can ONLY speak for the C&D and C&I industry, we are not expert in MSW or the issues facing local government.</p>
3	Please provide information on potential impacts which may result from increasing the waste levy.	As above, if its increased only in the metropolitan region it will increase levy avoidance.
4	<p>If you knew when the waste levy was going to be varied, how would it affect your decisions about managing waste or related investments?</p> <p>If you can provide evidence or more detailed information to support your views, this may help make a stronger case for appropriate action</p>	We would want substantial notice because we would be looking at investment in additional recycling equipment which requires planning.
	Chapter 5 - Setting future levy rates	
1	<p>If you knew when the waste levy was going to be varied, how would it affect your decisions about managing waste or related investments?</p> <p>If you can provide evidence or more detailed information to support your views, this may help make a stronger case for appropriate action</p>	If the levy is to rise and assuming its state wide, we would be looking at further recycling plant.

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	Chapter 6 - Geographical area of the levy	
1	Are there opportunities for the recovery of regional waste that would be made more viable by a regional waste levy?	<p>Yes, we can only speak to the C&D and C&I industries but at present in places like Bunbury, Albany, Esperance, Kalgoorlie, Geraldton etc there is little or no C&D or C&I recycling.</p> <p>In other words recycling would be viable around the regional high population centres. All that is happening in these areas at present is that product is going to the cheapest option which is landfill.</p>
2	Where are these opportunities most likely to be viable?	C&D and C&I as they leverage off quarrying, mining and screening equipment which is readily available in the regions.
3	What rate of waste levy could be required to make them viable?	<p>The levy must be the same in the Regions as it is in the metropolitan area.</p> <p>At present the levy is \$70 per tonne, if it is to remain at that rate for the Metropolitan area then it should be \$70 per tonne across the entire state.</p>
4	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?	<p>Yes absolutely, but the across the state levy has to be high enough to stop illegal carting.</p> <p>We do not support one levy in the metro and a lower levy on the regions, this will not stop levy avoidance.</p> <p>Currently we are aware of C&D and C&I material being carted up to 200km out of the city to rural landfills, seven days a week, 365 days a year. This 'shadow' industry is sophisticated and very incentivised and is using truck and dog combinations to minimise their transport costs.</p> <p>If the amount of the levy rises, and there is a margin between the metropolitan levy and the rest of the state then this margin will incentivise movement of waste ever further. The higher the levy, the higher the margin and the higher the incentive to cart waste illegally.</p> <p>The margin will affectively pay to move waste further and further.</p> <p>The NSW and QLD government were confident that the distance from Sydney to Ipswich just over the Qld border which is 800km was too far for waste to be moved from NSW to QLD. According to Mike Ritchie Consulting before the QLD levy was</p>

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		introduced, it exceed \$5m per week. Ipswich became to landfill capital of the eastern seaboard.
5	<p>What other advantages or disadvantages could arise from a regional waste levy?</p> <p>If you can provide evidence or more detailed information to support your views this may help make a stronger case for appropriate action.</p>	<p>We only support a regional levy at the same rate as the metropolitan levy, the advantages from a regional levy are:</p> <ol style="list-style-type: none"> 1. It willstop people transporting waste out of the metropolitan area in order to avoid the levy. 2. Increase the amount of material recycled within the metropolitan region. Each day massive amounts of C&D and C&I waste that could be recycled is moved to rural landfills. in flagrant violation of the WARR Act. Estimates vary but it is at least one million tonnes per annum. This material could all be recycled. 3. There is in fact a shortage of material ie concrete suitable to be recycled in to material that will meet the Roads to Reuse specification. If Subiaco oval had not in 2019 been demolished by a responsible contractor who refused to take advantage of the lower prices of levy avoidance, there would not have been sufficient material available to support the Main Roads WA/ DWER trial. 4. The very companies the levy was supposed to support, honest and legitimate companies like WSM are being penalised . The current regulations have seen more and more material leave the metropolitan area, The only way legitimate business have been able to compete has been to continually lower our gate prices, Gate prices are part of the economics of recycling and C&D recycling in WA is now at a standstill as gate prices are not viable. Contrast this with the situation in Victoria, where Crushed Recycled Concrete has been accepted in the market for 20+ years. Concrete recyclers have been known to pay for reusable concrete to meet supply. In WA the opposite applies 5. With virtually no C&D recycling in the regions this is doing nothing to limit virgin products extraction. We can't have a circular economy unless it also applies to the regions.

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	Chapter 7 - Waste management options to be levied – Energy Recovery and Stockpiling of waste	
1	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?	Not significantly
2	Would a waste levy on energy recovery have a different effect on your operations?	Yes, we extract any putrescible material that arrives at our facility, this is all combustible. We have seen Waste to Energy as being an option for this product and a levy would affect its viability. We have also been looking at C&I recycling plants which are viable in NSW due to the higher levy, these plants yield very high recycling yields in excess of 80%. They rely however on the sale of the high calorific value 'floc' to cement kilns and similar.
3	Are there any other waste management options where applying a levy could help achieve the objective of Waste Strategy 2030? If you can provide evidence or more detailed information to support your views, this may help make a stronger case for appropriate action.	No
	Chapter 8 - Other improvements to the waste levy	
1	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 Waste Strategy 2030? If you can provide evidence or more detailed information to support your views, this may help make a stronger case for appropriate action.	No

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