

Submitted to Review of the waste levy  
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## Introduction

### Your Details

1 What is your name?

Name:

Star Gianatti

2 Do you want to remain anonymous?

No

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6 Do your views officially represent those of an organisation?

No, these are my personal views

If yes, please specify the name of your organisation.:

7 Which of the following best describes the group or person you represent?

Private citizen

If other, please specify.:

I am also an Environmental Scientist

8 Are there specific parts of your submission that you want to keep confidential?

No

If yes, please outline which specific parts of your submission must be kept confidential and explain why:

### 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?

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Educate: Increase awareness of the cost of disposal to private and commercial sectors as well as the general public. Many people are oblivious of the idea paying for waste disposal unless they are directly related to an industry that incurs the cost. Local government is a good example of waste generators (i.e the public) that have very little connect with the cost of their waste disposal once it leaves their property. Education and community engagement is another key outcome of the implementation of the Waste Strategy 2030.

### How the levy can help achieve the objectives of Waste Strategy 2030

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

By itself a levy is not truly effective as an instrument for achieving waste reduction practices in either the commercial or private sector. If utilised in conjunction with other forms of management such as policies, industry best practice guidelines, awards and incentives it can then leverage a greater response to achieve a goal set by the Waste Strategy 2030.

A major drawback of only implementing a levy increase, without providing other supporting systems such as increased onshore recycling opportunities, brings about the issue of levy avoidance and waste stockpiling which have the potential to create major environmental and safety risks within the community. This would not be prevalent for a local government but it would be rife within industry and the private sector.

## Rate of the levy

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

Examples of direct benefits/impacts of the levy on the operations of a local government run landfill facility

- a. The increase in focus towards the success of a resource recovery facility such as a shop or recycling centre.
- b. Implementation of more bin systems to collect and recycle more waste streams - justifiable by the lower cost, sorted waste entry fee at the facility.
- c. Seeking of recycling opportunities, such as mixed plastics, to local onshore contractors willing to remove the product for \$0 cost (minus labour and loading) gaining the net \$70/t levy return on this waste stream.
- d. Increase in focus on E-Waste and the processes around the dismantling and maximising recovery of parts.
- e. Increase in site based understanding of the alternative use of materials on site such as construction waste, building materials, Super 6 etc for various activities.

### 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?

Greater focus on the collection point of waste for local councils. If the levy was increased it would encourage councils to consider and compare the cost of disposal versus the cost of collection (i.e. verge collections, pre-booked systems, skip bin collections, increased number of tip passes per dwelling etc) and weigh up the different versions of in-house or contractor programs.

Providing the community with waste collection options but utilising systems that control their consumer behaviour and encourage better reuse options, better engagement in a circular economy and better use of their current bin collection systems.

### 3 Please provide information on potential impacts which may result from increasing the waste levy.

Waste avoidance practices, stockpiling and dumped rubbish.

Potential issues with a straight up increase of the landfill levy would be higher rates of community dissatisfaction (Tip entry price increases), higher chance of illegal dumping, less commercially viable options for local businesses (again due to higher tipping fees) and increased chance of mixed loads across the weighbridge with people trying to hide the higher disposal cost items in things like greenwaste.

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

A long term levy increase schedule with 5-7 years of increments to allow the local govt sector to plan ahead and determine how to manage the increase within the rates and charges to the public would be necessary - as previously done. This is particularly important in local government as each demographic and geographic location is unique in WA and the varied inputs of waste will heavily affect how the facility is run and may potentially make it non-viable resulting in facility closure and loss of public assets.

## Setting future levy rates

### 1 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?

The waste levy needs to be set, preferably for a 5 year period, whether fixed or increasing over time, to allow for industry and other sectors to successfully plan for waste management practices to be successful and financially viable. The balance of the emerging knowledge and improved practices/options around best practice management needs to be offset or dealt with in an alternative way alongside but not competing with the levy. The offsets for improved practices could be implemented as interim approaches which would then be reviewed once the set levy period is up for consultation again.

## 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?

In WA this question has to be directly related to the northern industries that are heavy waste producers with almost no options for recycling or reuse. There is no supporting infrastructure to allow the northern parts of the state to successfully engage in recycling techniques. It may be better to separate the zones between North of Capricorn and South of Capricorn and then again go regional versus metro.

Regional difference need to be considered thoroughly in WA and I think the best approach would be a regional sector levy for construction, mining and primary industry, versus local government or private waste streams.

There would be huge impacts of waste avoidance, illegal dumping and other such awful processes occurring in regional areas if the levy was set at a level that didn't reflect the regional output of recycling and available opportunities and existing infrastructure.

There are always opportunities for regional waste recovery but this needs to be supported by the government through 100% application of the levy into possibly supplementing recycling and recovery activities to kick start industries willing to test the viability.

### 2 Where are these opportunities most likely to be viable?

In the regional centres closest to the metro area first such as Northam and Brookton or those that are further out with a substantial population base such as Albany, Kalgoorlie, Geraldton etc.

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

I am not sure but of a suitable rate but surely the cost of transport of waste long distance versus on site processing versus landfilling has been studied to find that financially viable level. My concern is that regional areas do not have the same management structures and resources available, particularly in local government to allow effective research and monitoring of these issues.

### 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?

The transportation cost of the waste stream is the key factor in its likely success or failure so some streams will simply not ever be financially viable without the infrastructure set up in the individual township or regional centre.

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

Higher levels of dumping and avoidance are two key issues that come to mind immediately.

## Waste management options to be levied

### 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?

Energy recovery is only one tier up from landfilling and should be treated as the second last resort for waste management possible. The trouble with local government is that energy recovery is a very financially viable way of managing municipal waste production and avoiding the issue of travel/management costs involved in operating or accessing a landfill facility. It is always going to be the second last option and everything should be done to avoid the generation of waste first but this is not controllable in a local government, unlike in a industry or commercial set up.

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

Additional levies on areas such as energy recovery would need to again be considered from a sector specific approach. If the energy recovery option was being utilised by a local government as a way to reduce rates and costs to the general public then it should be a lower levy than recovery from a heavy producing industry such as construction that can spread the cost across several income streams and evenly distribute it to be more financially viable.

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

#### 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?

Should the levy be the same across the sectors or should private industry (like the mining and construction industries) pay more as they are directly benefiting from the waste generating practices? Should local governments be given a lower rate or a different type of payment schedule? Should local government have an offset option instead of paying levy, can they offset it by introducing high-end recycling opportunities for the community?

Local government has limitations that other industries don't have and though the levy can be a useful tool it needs to be considered with respect to these limitations and to work with them and not against them or the people bearing the majority of the cost will be the rate payer.

Stockpiling of waste and the policing around the management practice of waste held indefinitely needs to be addressed. A policy or best practice solution needs to be implemented specifically in this area to ensure individuals are held accountable in this area.