



Our Ref: 48/3  
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Department of Water and Environmental Regulation  
Locked Bag 10  
JOONDALUP DC WA 6919

Dear Sir/ Madam

## **WASTE LEVY REVIEW CONSULTATION PAPER**

Thank you for the opportunity to comment on the Review of the Waste Levy Consultation Paper dated February 2020.

The Shire of Waroona is located 108 kilometres south of Perth with a classification of rural. Additionally, 62% of the properties within the Shire exceed 0.1 hectare with the average property size being 82.9 hectare. Currently the Shire has one licenced landfill (L6756/1996/11) which consists of a Category 61 liquid waste facility approved to accept 850 tonnes per year and a Category 64 Class II putrescible landfill which is approved to accept 5,000 tonnes per year. The Shire has invested funds each financial year into improving the facility to reduce risks to users and improve the material recovery. In addition to these improvements the Shire is in the process of drafting a Waste Plan as per the written notification received in November 2019.

The Shire's diversion of waste from landfill is currently much lower than the diversion targets set by the *Waste Avoidance Resource Recovery Strategy 2030*. Based on the data collated for the Waste Plan for 2018/19 the total waste generated was 4,212 Tonnes with 1,054 Tonnes of material being recovered. This equates to a 25% diversion of waste from landfill.

As part of Section P2 of the Waste Plan the Shire has chosen a number of initiatives which will reduce the contamination rate of the kerbside recycling bins and reduce the amount of material being landfilled. Some of these initiatives include:

- Conduct a visual bin audit which would aid officers in determining education focuses and allow data collection around what waste streams and the percentage of those streams are being placed in kerbside bins.
- Implement an education and community engagement program. This will aid the Shire in reducing the amount of contamination in the kerbside recycle bins which is currently 16%.
- Construct a transfer station at the Buller Road Refuse Disposal Site. By constructing a transfer station concept at the current facility the Shire will be able to increase material recovery and capture and process the material prior to being transferred onsite to the active landfill cell. The construction will take five years due to budget constraints.

- Increase resource recovery at the existing landfill. The Shire is currently working on options to improve material recovery onsite which includes but is not limited to cardboard bins.
- Investigate a possible partnership with the Shire of Murray for material recovery. Due to a current resource sharing agreement with the Shire of Murray there is an opportunity to work together to make some material recovery more cost effective for both Shires.
- Implement a waste records system. This will allow for improved data collection which will remove any uncertainty regards previous data collected.
- Improve the recovery of specific Household Hazardous Waste (HHW). Improvements in our knowledge of the current HHW Programs (mobile muster, printer cartridges and household batteries) that the Shire participates in will help remove hazardous materials from landfill and increase material recovery.
- Investigate the three bin service. Review the results of the visual bin audit and assess the need for a three bin system. Given the rural classification and average property size it is expected that residents may have alternative measures already in place (chickens, home compost stations etc). The Shire will continue to investigate and it is expected that by removing food and garden organics from the general waste may result in a 5% diversion.

These initiatives have the possibility of improving the current diversion rate from 25% to 35%. The initiatives will incur a cost to the Shire which would need to be passed onto the small pool of ratepayers. It is expected that by implementing the above initiatives will cost in the order of \$520,000. Additionally, the cost of transportation to material recovery facilities often outweighs the benefits especially with small regional local governments like the Shire of Waroona.

Furthermore, the potential for the waste levy zone to be expanded to include the Peel Region poses a substantial financial impact on the community and the Shire rate payers. The addition of a waste levy would result in an annual cost increase in excess of \$110,000, which on top of the operational cost associated with a small landfill site is substantial. Small landfills generally generate a high unit cost, which, if passed directly on as user fees, would make the landfill essentially unviable. Hence, the fees are discounted, and the cost of providing the landfills is subsidised by other revenue, or the shortfall is ignored, which is a dangerous proposition when the time comes to close the site or renew assets and a bill of several million dollars with no funds available to cover.

<b>Total waste accepted at Buller Road Landfill less material recovered</b>	<b>3,158 tonnes</b>
Possible waste Levy - assume half of \$70	\$35
Levy Cost x 3,158 tonnes	\$110,530
Residential Services	2058
Increase to Shire fee to cover waste levy	\$55
Percentage increase in Shire fee to cover waste levy	30%
Increase to Shire fee to cover waste plan initiatives	\$253
Percentage increase in Shire fee to cover waste avoidance initiatives	136%

**Table 1: Breakdown of waste volumes and costs of the Levy at half the charge (\$35 in lieu of \$70) to rate payers**

As can be seen in Table 1 the increase to ratepayers will be substantial and unachievable considering the current economy. Therefore the Shire would like to stress the importance of leaving the waste levy zone as it currently stands or exempting small landfills from it. The

increase in costs to achieve the waste plan initiatives along with the waste levy will only encourage bad behaviour and increase the risk of illegal dumping which is against the vision of the WARR Strategy as well as the objective '2030: Move towards zero illegal dumping'. As it stands with the current pandemic our residents along with a large portion of the Western Australian population have already been hit hard with loss of income so by increasing the Shire fee to cover the impacts of the waste levy and waste plan initiatives is insulting whether it be now or in five years.

Some questions the Shire has in relation to the waste levy are as follows:

- If the levy was applied to the Peel region would smaller local governments like Waroona be exempted?
- What grant/s would the levy fund for the Shire to subsidise some of the initiatives mentioned in the Waste Plan?
- Will DWER offer a subsidy to help elevate the impact of transportation cost?

In conclusion, any expansion of the waste levy zone to include the Shire of Waroona without exemption would have a severe impact on the cost of waste management activities that has to be mostly borne by the Shire's ratepayers. It will also negatively affect the ability to increase the material recovery which is currently a challenge due to the impact of the transportation cost and volume. It would be more realistic for DWER to review all landfill sites and impose the levy on those who exceed 20,000 tonnes of volume per year.

If you have any queries or wish to discuss this matter further please contact Rikki Pulfer on [REDACTED]

Yours sincerely

[REDACTED]

**DEAN UNSWORTH**  
**CHIEF EXECUTIVE OFFICER**