

Waste Reform Consultation
Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC, WA, 6919

Dear Sir/Madam

Review of the Waste Levy and its possible introduction in regional/rural WA

In response to the Department's request for comment on the review of the Waste Levy and its possible introduction into regional/rural Western Australia, the Town of Port Hedland (Town) submits the following:

The introduction of a Waste Levy would increase the cost of management of waste to residents, as it is a cost which is passed onto residents via the annual Rate process. If the Levy is not actively reinvested back into waste avoidance and resource recovery, residents are paying a cost, however have limited ability to reduce that cost, or see any benefit of any increase. While the Town is implementing kerbside recycling in the next financial year (subject to Cleanaway either completing repairs to its South Guilford facility, or building a mini-MRF in Port Hedland), there is limited options or local/regional markets for recycling of other materials. The Town supports, and seeks to maximise recovery and reuse of materials at its Landfill site, however other than reusing most of the materials either within Town projects or within the Landfill itself. There is little market, and the cost and environmental impacts of transporting the bulk/heavy material to a metropolitan area would likely outweigh any benefit.

Fraudulent activity in the disposal of waste is likely to increase, and at the same time, honest players in the industry who comply with the Levy conditions and support the State's recycling objectives, will be disadvantaged. Given the vast areas of Unmanaged Crown Land, both with our District and other adjacent Local Government Authorities, there is already significant illegal dumping occurring and high potential for further illegal dumping, as residents and business look to avoid paying any imposed Levy. Illegal dumping is investigated by the Town's Ranger Service, whose resources are already stretched and unfortunately do not have the current capacity to extend investigation and enforcement in this area.

Town of Port Hedland Office

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For the Levy to be effective, the material has to have a viable recovery option. China's National Sword Policy, export bans and falling commodity prices, mean that the resource recovery sector has less capacity and funds to invest in these options. Therefore, it has never been more important for the Levy to be hypothecated into local resource recovery options.

If the State Government were to impose the Levy on the non-metropolitan area, there must be a prior commitment to support Local Government through the provision of 100% hypothecation of the Levy, particularly to address regional priorities including investment in local infrastructure and programs that support the development of local markets, together with support (including financial) for illegal dumping investigation and enforcement. A reduced Levy should be considered based on population, distance from metropolitan centres and/or annual tonnage received. Where no locally viable processing options and markets for recovered materials exist, a levy is likely to create an additional cost burden on Local Governments, residents and businesses with little or no environmental benefit.

Should you require any further information regarding this matter please contact Craig Watts, Director Regulatory Services on [REDACTED]

Yours faithfully

[REDACTED]

Craig Watts
Director Regulatory Services

13 May 2020

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