

23rd February 2015

WARRA Act Review
Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850

By email: warractreview@der.wa.gov.au

To the WARRA Act Review,

RE: REVIEW OF WASTE AVOIDANCE AND RESOURCE RECOVERY ACT 2007

UDIA is pleased to provide this submission to the Department of Environmental Regulation's review of the *Waste Avoidance and Resource Recovery (WARR) Act 2007: Discussion Paper*.

The Urban Development Institute of Australia (UDIA) WA is the peak body representing the urban development industry in Western Australia. UDIA is a membership organisation with members drawn from the development, planning, valuation, engineering, environmental, market research and urban design professions. Our membership also includes a number of key State Government agencies and Local Government Authorities from across the state. Nationally, UDIA represents the interests of thousands of members and includes all the major land development companies, both public and private, and specialist consultancy firms.

Scope of Comments

The following comments are provided following review of the WARR Act discussion paper, with the understanding that the key proposed changes have been developed to promote efficiencies in the collection and processing of waste between local government boundaries. UDIA have received limited comment from our members, and as such the comments provided below are provided on an 'in principle' basis. Practical issues with regard to implementation of the proposed changes and the mechanisms through which they are actioned may require further consideration if and when appropriate amendments are drafted.

UDIA Feedback

UDIA supports the efforts of the Department of Environment Regulation (DER) in reviewing the WARR Act and the intent of the proposed changes in streamlining processes and systems to promote efficiencies. The alignment of plans, waste services and contracts with a central waste infrastructure plan and Waste Strategy, through coordinated waste groups, has the potential to create greater efficiency in the management of municipal waste, promote consistency of processes and policy between jurisdictions and reduce costs by taking advantage of economies of scale.

UDIA would encourage DER, as well as proposed waste groups to consult with industry in the development of coordinated plans and policy frameworks to ensure changing demands for waste services are able to be met and resources are allocated appropriately. The establishment of new systems and processes should also consider transitional arrangement to ensure continuity of service delivery during implementation.

Where possible, policy frameworks should allow for flexibility and consideration of alternative waste management measures, including private collection arrangements. UDIA believes that private arrangements and similar alternative measures are likely to become increasingly prevalent as we work towards achieving the state government's infill target of 47%. Additionally, planning and legislative reforms aimed at effecting key targets such as those to the Strata Titles Act have to potentially to create further opportunity for innovation in this area. Therefore reforms to the WARR Act should be adaptable in their ability to respond to an evolving system and built form product mix.

Conclusion

UDIA appreciates the opportunity to provide these comments to the Department of Environmental Regulation in response to the Review of *Waste Avoidance and Resource Recovery Act* (2007).

If you require any further clarification in regard to the comments contained here, please feel free to contact a member of our policy team at policy@udiawa.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Debra Goostrey', with a stylized flourish at the end.

Debra Goostrey

Chief Executive Officer