

SUBMISSION

ON

CONSULTATION DRAFT
THE WESTERN AUSTRALIAN STATE
SUSTAINABILITY STRATEGY
September 2002

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PREPARED BY THE



MUNICIPAL WASTE ADVISORY COUNCIL

"Getting the Environment Right"

ACKNOWLEDGEMENTS AND BACKGROUND

The Municipal Waste Advisory Council (MWAC) is a standing committee of the Western Australian Local Government Association (WALGA) with delegated authority to represent WALGA in all matters relating to waste management.

MWAC has been formed through collaboration with Regional Waste Management Councils who are not ordinary members of WALGA. The resulting body effectively represents the views of all Local Government bodies responsible for waste management in Western Australia.

Decisions and positions adopted by MWAC are considered by a board of Elected Member representatives from each member organisation who are supported by an Officers' Advisory Group (OAG) which has officer representatives from each member organisation.

MWAC's member organisations are:



Mindarie Regional Council

Southern Metropolitan Regional Council

Eastern Metropolitan Regional Council

South East Metropolitan Regional Council

Western Metropolitan Regional Council

Geraldton-Greenough Regional Council

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1. INTRODUCTION

The Western Australian Local Government Association is pleased to provide the following submission which aims to provide a considered response to the Consultation paper 'The Western Australian State Sustainability Strategy' produced by the Department of the Premier and Cabinet.

MWAC commends the Sustainability Policy Unit, and the Department of the Premier and Cabinet, for its initiative and leadership in the formulation of a strategic direction in the area of sustainability. "Reducing and managing waste" has been addressed under *Sustainability and Settlements*.

MWAC has, however, identified several key issues that warrant further consideration by the Sustainability Policy Unit and the Department of Premier and Cabinet in their pursuit of a well formed Strategy supported by key stakeholders. These issues are provided in Section 2 – Key Issues.

The detail of responses provided in this document are deliberately limited and general and reflect the view that the discussion paper, although quite detailed in some sections, will need to be significantly rewritten if it is to truly achieve a status as a generally accepted set of strategic directions and actions for sustainability and waste management in Western Australia.

Where possible, responses have been kept intentionally positive to focus on improvements that could be included in preparing the Strategy and priorities. The response is not formulated on a 'word by word' editing basis as this is not useful for commenting on broader issues of scope and approach.

2. KEY ISSUES

2.1. IMPLEMENTATION

A clear direction needs to be set as to the integration of sustainability legislative and policy actions between portfolios, particularly regarding those issues over which disputes arise. There has traditionally been limited practical interaction and coordinated legislative planning between many government agencies. MWAC believes that this must be addressed to ensure the successful implementation of any sustainability Strategy. Waste management and planning is just one example of a situation where integration has been limited and governmental and community issues have arisen.

MWAC believes that an independent panel or citizens jury should be involved in these cases, particularly in situations of entrenched interdepartmental difference of opinion.

A recent survey of Local Government (waste management) Officers highlighted a fundamental confusion and uncertainty about sustainability in general and the practical implementation of the Strategy specifically. Detailed information in the form of seminars, training, information kits, and implementation manuals was felt to be essential for the successful implementation of the Strategy. Sustainability indicators and baseline measures for assessment of change are insufficiently addressed in the Strategy and were considered to be essential for implementation. MWAC recommend immediate research into the development of indicators and baseline measures.

2.2. THE STRATEGY AND LOCAL GOVERNMENT

In general terms, the Strategy will encourage Local Governments to work together to enable a cost effective, coordinated approach, providing greatly needed structured guidance on this issue. It is believed, however, that the potential resource drain to set up and implement this Strategy in already under resourced, struggling, small shires will be significant and the need for increased expertise high. Increased funds would be required for audits, formulation of management plans and implementation and monitoring of actions and additional staff training and time will be necessary. Assistance in setting up regional groups particularly in rural areas is necessary to ensure cost effective implementation of the Strategy. Education programs will be essential to convince residents and ratepayers that sustainability is a vital issue.

MWAC is particularly concerned that the Strategy will **require** Local Governments to implement actions, whereas State departments are only encouraged. MWAC believes that all should be treated equally, either both required or both encouraged. It is important that State government takes the lead in the implementation of the Strategy. Implementation will be slow and limited, if not required.

2.3. THE STATE-LOCAL GOVERNMENT ROUNDTABLE

MWAC believes that the State-Local Government Roundtable is a useful model for the state/local government interface. It is considered important that the brief of the Roundtable be to develop policies that will support the objectives of sustainability and provide information to State departments and Local Governments. It is also considered essential that the interface is interactive and proactive with a high level of support offered from the State government to achieve desired outcomes.

The Strategy is unclear as to the exact constitution of the Roundtable. In order to ensure optimum discussion, the Roundtable would best be served through the inclusion of several members of WALGA, at least one of whom should be a sitting member, with the remaining members representative of relevant issues before the Roundtable. MWAC is supportive of the inclusion of community and industry stakeholders in the Roundtable in an informative capacity. However, to maintain consistency with the intent of the Roundtable, any voting rights of these stakeholders in the Roundtable would be considered inappropriate. It should also be made clear who is bound by the decisions of the Roundtable and how those decisions will be enforced.

2.4. “REDUCING AND MANAGING WASTE”

It is essential that consistent definitions of key concepts be used throughout government policy to ensure effective policy implementation. The title *Reducing and managing waste* is not in line with current policy terminology and should be altered to refer to waste as a resource. In addition, the development of consistent waste hierarchy that is based on sustainable waste management is vital for the coordinated success of the Strategy.

As the Strategy reflects and largely relies on the aims and objectives of WASTE 2020, WASTE 2020 must be altered to consistently reflect the principles, objectives and actions of the Strategy. However, WASTE 2020 discusses “working towards zero waste by 2020” not “achieving zero waste by 2020” as stated in the Strategy. The document also specifies 4 waste precincts, whereas the Strategy states 5 and does not explain the justification for the increase.

The Strategy does not refer to DEWCAP in reference to their waste management role and places all responsibility for waste management firmly onto the Waste Management Board (WMB). This ignores the roles which are not performed by the WMB and are rightly the responsibility of DEWCAP.

MWAC has stated previously and continues to maintain that a legally separate, financially independent organisation should be established for waste management, ensuring that effective, sustainable waste management is achieved in Western Australia.

The Strategy does not mention funding for the proposed actions and MWAC suggests that the review of the Waste Management fund reflect the proposed Strategy. Local Governments are concerned that they will ultimately be held financially responsible for the implementation of sustainable waste management in Western Australia and maintain that implementation will be inhibited if this is the case. Financial assistance from State government will be essential for the success of the Strategy.

2.5. ACTIONS

The lack of reference to sustainable waste indicators and baseline measurements limits the potential for implementation of the Strategy. The development of measurable, relevant criteria may be one of the most significant outputs that the Strategy could provide. Even if the suggested actions are less than ideal, a rigorous method of evaluation will demonstrate how well actions are meeting the criteria that have been set. In this case, there is the opportunity to review the actions and make steady progress to more effective actions.

The alternative is to proceed on a poorly defined basis – in which case it will be equally difficult to either prove or disprove the effectiveness of the actions undertaken – a situation which constantly calls into question the approach being taken.

Actions Underway

MWAC supports the actions currently underway, with the exception of the development of a whole-of-government procurement policy for waste paper recycling. MWAC believes that the procurement policy should not be restricted to waste paper and should include all recyclables.

Proposed Actions

4.41 MWAC support this action

4.42 MWAC support this action

4.43 MWAC support this action

4.44 MWAC support this action

4.45 MWAC believe that the use of recycled products and the recycling of paper, glass, plastics, metals and organic waste by all government agencies should be a requirement, not just encouraged.

4.46 MWAC support this action if other agencies and stakeholders are also required to implement actions

4.47 MWAC support this action

4.48 MWAC believe that all government agencies should be required, not just encouraged to reduce consumption and waste.

4.49 The intent of this action is unsure and therefore cannot be considered until its meaning is clarified.

4.50 MWAC generally support this action with some reservation with respect to the transport and importing aspects of hazardous wastes.

4.51 MWAC supports the formation of resource recovery precincts as described in WAsTe 2020 where they are consistent with facility siting and proximity principles. The discrepancy between the Strategy and WAsTe 2020 should be explained.

The actions should be expanded to include reference to industrial wastes other than hazardous such as commercial and demolition waste, restaurant and supermarket wastes. Local government is not responsible for the collection or disposal of these wastes. The recent survey indicated that very little of this waste, particularly in rural areas, is in fact measured. Cleaner production programs should be required from industries generating wastes other than hazardous.

The actions should acknowledge the impact of distance on waste management and the effect of this on rural Local Governments. Additional considerations must be discussed (possibly at the Roundtable) and incorporated into the Strategy.

Indicators and Targets

As previously discussed, WAsTe 2020 advocates working towards zero waste by 2020, not achieving zero waste by 2020. The Strategy should be altered to reflect this or describe the change.

The Strategy does not describe the origin of the factor of 4 reduction in resource consumption by 2020. In fact, MWAC believes that current levels of resource consumption are not known and are uncertain how the factor of 4 will subsequently be achieved.

The Strategy refers to zero waste being achieved through 70% reduction, reuse and recycling & 30% secondary waste processing with no explanation of this choice of technologies or the assigned proportions.

As previously discussed, MWAC supports the formation of resource recovery precincts as described in WAsTe 2020. The discrepancy between the Strategy and WAsTe 2020 should be explained.

2.6. FUNDING

It should be acknowledged that a limited pool of funds is available to Councils for the range of services they provide. It is unlikely that significant increases in resource allocation for waste management will take place in the highly competitive field of Council expenditures. Failure to recognize these very real resource restraints may well undermine critical areas of activity within the Strategy.

Feasible funding scenarios for implementation need to be developed to ensure that adequate resources can be put to the task. Failure to provide adequate resources will lead to underperformance of existing programs and may unfairly colour the assessment of new programs or activities. Simply assuming that all sectors will be able to divert significant resources to the work of a waste education Strategy is courting failure or patchy uptake of actions.

MWAC believe that a State Government Draft Budget for implementation of the Strategy be included in order to obtain an idea of the funds available and what will need to be covered by Local Government. Input from Local Governments regarding funding and budget arrangements in the initial stages of the development of the Strategy is essential.

2.7. OPPORTUNITIES

Western Australia has an opportunity to be a policy innovator with the development of this Strategy and priorities. Consequently, it is essential that advantage is taken of best practice from all stakeholders, including waste management, environmental management and educational providers. An opportunity exists with this document to take leadership in moving from “wastes” to “resources” and to fully investigate strategies to affect the environmental, economic and social impacts of waste generation in society.