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To whom it may concern

## **WASTE AVOIDANCE AND RESOURCE RECOVERY STRATEGY CONSULTATION PAPER**

Thank you for the opportunity to provide feedback in relation to the *Western Australian Waste Avoidance and Resource Recovery Strategy, Consultation Paper*. The Urban Development Institute of Australia (UDIA) WA is the peak body representing the property development industry in Western Australia. UDIA is a membership organisation with members drawn from the residential, commercial and industrial property development sectors, including both private and public sector organisations. Our industry represents approximately 12.3% of Western Australia's Gross State Product, contributing \$30.45 billion annually to the Western Australian economy and \$251.7 billion nationally. As well as helping to create sustainable and liveable communities, the industry employs a total of 228,500 Western Australians and over 2 million Australians across the country.

UDIA supports the aims and objectives as set out in the proposed Strategy's consultation paper and the intention of moving towards a 'circular economy'. As the paper correctly identifies, a circular economy retains "*material resources in use, or 'circulating' as long as possible*". The key to achieving this outcome is to recognise material as a 'resource' rather than simply 'waste'. Therefore the Institute strongly encourages the Authority to ensure that material is not regarded or defined as 'waste' simply because it has previously been used, stored at a particular premise, or is considered a by-product of another process. Accordingly, the Institute recommends that the Authority seek to ensure that the waste levy operates effectively and delivers appropriate levels of resource recovery, particularly with regard to the practices of the development industry.

UDIA welcomes the clarity of the proposed Strategy's objectives and supports the intent of minimising the environmental impact of waste, reducing waste generation and increasing recovery. The Institute is also supportive of the inclusion of measurable outcomes which are fundamental to monitoring the Strategy's progress and the effectiveness of the actions that it identifies. Therefore it is disappointing that no measurable targets are identified for Objective 1. The statement that "*over time, we propose to identify baseline data to inform the development of targets for the management of environmental risks of waste*" is ambiguous and offers no insight as when this baseline data will be developed. The Strategy should set out a clear timeframe for developing baseline data to monitor performance against Objective 1.

The Strategy notes that Western Australians generate more waste than the national average. However, the reasons for this have not been clearly explained, which raises the question as to whether the reasons why we generate more waste per capita than the national average are properly understood. Indeed, as page 9 of the Strategy identifies, there is a “*need to improve the quality and reliability of data on waste to inform regulatory decisions and policy*”. Given this context, it is unclear how effective the actions accompanying Objective 2 are likely to be and whether or not alternative actions may be more appropriate. Furthermore, because of the very broad nature of the measurable targets that accompany this objective which seek a general reduction in waste generation per capita, the effectiveness of the individual actions identified cannot be measured. The Institute recommends that as a priority, research is undertaken to more accurately understand waste generation issues in WA. Suitable actions can then be developed for areas where opportunities exist to make significant improvement in reducing the generation of waste, whilst also allowing for more effective and targeted monitoring to be undertaken.

With regard to Objective 3, the Institute queries why the resource recovery targets for construction and demolition waste are the highest of all the industry sectors identified. No reasons are provided for this and no actions identified to help achieve this target beyond the provision of funding to increase the use of recycled construction material in government road construction. It is also unclear what the percentage figures relate to, how construction and demolition waste material is defined and how this will be measured. As such, the Institute recommends that the resource recovery targets for construction and demolition material be clarified.

The Institute is disappointed that the Strategy is silent on the issue of the commercial collection of household waste. The Institute contends that opportunities to allow for commercial, household waste collection should be examined, particularly as our communities, lifestyles and built environment continue to evolve. These providers are able to offer more tailored solutions that allow the collection of waste to be undertaken more effectively and efficiently, particularly with regard to waste collection from medium and high density housing developments. Furthermore, economic imperatives mean that private operators are encouraged to find the best use of material collected, selling it for recycling purposes. For these reasons, the Institute encourages the Strategy to examine alternative household waste collection methods, including from private sector providers.

Should the Department require any assistance or further information regarding this matter, the UDIA would be delighted to assist. Should any further information be required in relation to the comments above, please contact Chris Green, Director Policy and Research at [cgreen@udiawa.com.au](mailto:cgreen@udiawa.com.au) or 9215 3400.

Yours sincerely



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