

05 November, 2018

Waste Authority
C/-Department of Water and Environmental Regulation
Level 4, The Atrium
168 St Georges Terrace
PERTH WA 6000

Via email: wastestrategyreview@wasteauthority.wa.gov.au

Dear Sir/Madam

DRAFT WASTE STRATEGY 2030

Thank you for the opportunity to provide feedback in relation to the draft *Waste Strategy 2030*. 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. UDIA members include both private and public sector organisations. Our industry represents approximately 12.7% 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 224,500 Western Australians and almost 2 million Australians across the country.

UDIA commends the consultative approach adopted by the Authority in the preparation of the draft Strategy and acknowledges the efforts given to addressing many of the Institute's concerns raised in its submission to the previous *Waste Avoidance and Resource Recovery Strategy, Consultation Paper*.

UDIA reaffirms its supports for the aims and objectives as set out in the draft Waste Strategy and the intention of moving towards a 'circular economy' that retains materials in the economy for 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. However, whilst UDIA is supportive of the inclusion measurable targets to monitor progress against each of the Strategy's objectives, the Institute queries why the reduction and recovery targets set out for the construction and demolition waste in Objective 1: Avoid and Objective 2: Recover are the highest of all the industry

sectors identified. Indeed, the 30% avoidance target for C&D waste are three times the 10% municipal solid waste target. No reasons are provided for this and no specific actions identified to help achieve the targets for construction and demolition materials. The Institute is also concerned by the inclusion of 'clean fill' in the list of focus materials without further clarity on the Government's intentions for this material. It is also unclear what the percentage target 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 further 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. Please contact Chris Green, Director Policy and Research at cgreen@udiawa.com.au or 9215 3400.

Yours sincerely



Allison Hailes
Chief Executive Office