



INFORMATION BULLETIN

Issue No. 75



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SUMMARY OF COUNCIL RESOLUTIONS

List of resolutions for the financial year 2022/2023 plus any outstanding resolutions from previous years				
OCM /SCM Date	Item #	Resolution	Status	
23.02.2023	8.1	That the Minutes of the Ordinary Meeting of Council held on 15 December 2022 be confirmed as a true record of the proceedings.	For Information	
	9.1	That Council: Receive the Financial Statements set out in Appendix No. 1 and 2 for the months ended 31 December 2022 and 31 January 2023.	For Information	
	9.2	That Council: Note the list of payments made under delegated authority to the Chief Executive Officer, for the months ended 31 December 2022 and 31 January 2023.	For Information	
	9.3	That Council 1. Adopt the 2022/23 mid-year budget review as presented. 2. Approve the adjustments to the 2022/2023 MRC Budget as detailed in this report and attachment, in accordance with section 6.8(1) of the Local Government Act 1995.	For Information For Information	
	9.4	That Council: 1. adopt the Local Government Compliance Audit Return in the form approved by the Minister for the period 1 January to 31 December 2022 as contained within the Appendices in accordance with the provisions of <i>Regulation 14(3) of the Local Government (Audit) Regulations 1996</i> and in line with the recommendation from the Audit and Risk Committee; 2. authorise the Chairperson and the Chief Executive Officer to complete the Joint Certification contained in the adopted Return detailed in (1) above; and 3. authorise the Chief Executive Officer to submit the adopted Return detailed in (1) to the Director General, Department of Local Government.	For Information Completed Completed	
	10	That the Members Information Bulletin Issue No. 74 be received.	For Information	
	14.1	That Council: 1. Endorses the CEO's Review of Risk Management, Internal Controls and Legislative Compliance version 13 February 2023, as presented, "subject to the following amendment at attachment 4a on page 17, delete the words "at least every 5 years" and insert the words "as required if there are changes in the conditions". 2. Endorses the CEO's Review of the High Risk Register as reviewed on 24 November 2022, as presented.	For Information For Information	
	15.12.2022	8.1	The Minutes of the Ordinary Council Meeting held on 24 November 2022 have been printed and circulated to members of the Council.	For Information
		9.1	That Council: Receive the Financial Statements set out in Appendix No. 1 for the month ended 31 October 2022.	For Information
		9.2	That Council: Note the list of payments made under delegated authority to the Chief Executive Officer, for the month ended 31 October 2022.	For Information
9.3		Receive the Financial Statements set out in Appendix No. 4 for the month ended 30 November 2022.	For Information	
9.4		That Council: Note the list of payments made under delegated authority to the Chief Executive Officer, for the month ended 30 November 2022.	For Information	
9.5		That the Council resolve to: 1. Notes the recommendation of the Audit Committee meeting held on 1 December 2022 to adopt the Financial Report for the year ended 30 June 2022; and 2. Adopts the Annual Report for the year ended 30 June 2022, which includes the Financial Report detailed in point 1 above.	For Information For Information	
9.6		That the Council: 1. Notes the information contained in this report. 2. Requests the CEO to present a report to Council with a recommendation for the procurement of insurance for 2023/24 in April 2023. 3. Requests the CEO to obtain independent legal advice in relation to whether Local Governments have to go out to Tender for Insurance services and whether they are exempt from <i>s3.57 of the Local Government Act</i> .	For Information Completed Completed	
9.7		That the Council: 1. Adopt the meeting dates as follows: 23 February 2023 - 6.30 pm City of Joondalup OCM 27 April 2023 - 6.30 pm City of Wanneroo OCM 01 June 2023 - - 6.30 pm Town of Cambridge OCM 13 July 2023 - 6.30 pm City of Stirling OCM 21 September 2023 - 6.30 pm City of Vincent OCM 30 November 2023 - 6.30 pm Town of Victoria Park OCM 14 December 2023 - 6.30 pm City of Perth OCM 2. Issue a Public Notice on the meeting locations, dates and times as detailed in (1) above in accordance with Part 12 (1) of the Local Government (Administration) Regulations 1996 and the Local Government Act 1995. 3. Note that a Strategy Workshop has been planned for 2 February 2023. Future workshop dates for 2023 will be determined, in consultation with the Chair, later in 2023.	For Information Completed For Information	

	10 14.1	That the Members Information Bulletin Issue No 73 be received. That Council: · Notes the Annual Financial Audit Planning Summary Year Ended 30 June 2022 · Notes the Auditor General Independent Auditors Report 2022 · Notes the Annual Financial Audit Exit Brief Year Ended 30 June 2022 · Notes the Representation Letter Year Ended 30 June 2022	For Information For Information
24.11.2022	8.1	That the Minutes of the Ordinary Meeting of Council held on 29 September 2022 be confirmed as a true record of the proceedings.	For Information
	9.1	That Council: Receive the Financial Statements set out in Appendix No. 1 for the month ended 30 September 2022.	For Information
	9.2	That Council: Note the list of payments made under delegated authority to the Chief Executive Officer, for the month ended 30 September 2022.	For Information
	9.3	That Council: Endorses the CEO to provide access to Workpower Inc. to the Tamala Park Waste Management Facility, for a term of 3 years, for the delivery of not-for-profit training and education programs.	Completed
	9.4	That Council: 1. Endorses the CEO to provide Workpower Inc. access to the caretaker's house at the Tamala Park Waste Management Facility, for a term of three (3) years, for the delivery of NDIS assisted living programs. Moved Cr May, seconded Cr Hatton PROPOSED AMENDMENT Moved Cr Vernon, Seconded Cr Proud 1. Approves the grant of access to Workpower Inc. to the caretaker's house at the Tamala Park Waste Management Facility, for a term of three (3) years, for the delivery of NDIS assisted living programs. 2. Authorises the CEO to execute an agreement with Workpower Inc for access to the Caretaker's House in accordance with point one above on terms and conditions acceptable to the Mindarie Regional Council including but not limited to the terms in the addendum to item 9.4. Reason for Amendment: To reflect both the grant of access and the authorisation to enter into an agreement to reflect that access.	Completed
	9.5	That Council: 1. resolves to make the Mindarie Regional Council Waste Facility Site Amendment Local Law 2022 as detailed in Appendix 4 and authorises the Common Seal to be affixed; 2. under section 3.12 (5) of the Act, authorises the publication of the Mindarie Regional Council Waste Facility Site Amendment Local Law 2022 in the Gazette and the provision of a copy to the relevant Minister/s; and 3. under section 3.12 (6) of the Act, authorises the MRC to give local public notice in respect of the Mindarie Regional Council Waste Facility Site Amendment Local Law 2022.	In progress
	10	That the Members Information Bulletin Issue No. 72 be received.	For Information
	14.1	That Council: Authorise the CEO to award the tender for Pick up and or Drop off of Green Waste to be Recycled (Tender Number: 13/158) to Craneswest (WA) Pty Ltd at the prices detailed within the report	Completed
	14.2	That Council: 1. Note the Green Deal Alliance progress report.	For Information
	29.09.2022	6	That Council approves the request for Leave of Absence from Council duties for Cr Re on 24 November 2022.
8.1		That the Minutes of the Ordinary Meeting of Council held on 25 August 2022 be confirmed as a true record of the proceedings.	For Information
9.2		That the Council: 1. Appoint Cr Ferrante onto the Chief Executive Recruitment and Performance Review Committee. 2. Appoint Cr Castle as a deputy member onto the Chief Executive Recruitment and Performance Review Committee.	For Information For Information
9.3		That Council: Receive the Financial Statements set out in Appendix No. 1 and 2 for the months ended 31 July 2022 and 31 August 2022.	For Information
9.4		That Council: Note the list of payments made under delegated authority to the Chief Executive Officer, for the months ended 31 July 2022 and 31 August 2022.	For Information
9.5		That the Council: 1. Endorses the changes to Council Policies as contained in Appendix 6 and 7 of this report. 2. Endorses the delegations made to the Chief Executive Officer as detailed in Attachment 1 of this report.	For Information For Information
10		That the Members Information Bulletin Issue No. 71 be received.	For Information

	14.1	That Council: 1. Endorses the publication of a tender for the provision of FOGO processing services. 2. Requests the CEO to bring back to council a report, detailing the outcome of the tender and recommendations regarding an award. 3. Approves an increase in the 2022/23 budget for the costs specified in the Financial Implications section of the report. 4. Endorses the recommendation to insure the Neerabup Resource Recovery Facility, as detailed in the Confidential Report.	For Action For Action For Action For Action
	14.2	That Council 1. Note the advice contained in the report. 2. Requests the CEO to make a notation on the minutes of the Ordinary Council meeting of 7 July 2022 at item 16.1 referencing the minutes of the Ordinary Council meeting of 29 September 2022.	For Information Completed
	14.3	That Council 1. Note the Full Risk Register 2. Note the Risk Assessment and Acceptance Criteria v3 3. Note the Risk Appetite Statement and Risk Management Plan 4. Note the Business Continuity – Information Technology	For Information
	14.4	That Council: 1. Notes that the appraisal of Scott Cairns, Chief Executive Officer, has been undertaken for the period 20 September 2021 to 30 June 2022. 2. Endorses the findings of the MRC CEO Performance Review Report 2021/22 as per confidential attachment 1. 3. Reviews the CEO's Total Remuneration Package for 2022/23 and endorses the adjustment to the CEO's total reward package as specified in Confidential Attachment 3 4. Approves the 2022/23 CEO Key Performance Indicators as per the amendments to confidential attachment 2 to this report. 5. Endorses the adjustment to the CEO's contract detailed in confidential attachment 4.	For Information For Information Completed Completed Completed
25.08.2022	8.1	That the Minutes of the Ordinary Meeting of Council held on 07 July 2022 be confirmed as a true record of the proceedings.	For Information
	9.1	That Council: Receive the Financial Statements set out in Appendix No. 1 for the month ended 30 June 2022.	For Information
	9.2	That Council: Note the list of payments made under delegated authority to the Chief Executive Officer, for the month ended 30 June 2022.	For Information
	10	That the Members Information Bulletin Issue No. 70 be received.	For Information
	11.1	Notice of Motion That Council: 1. Requests that the Mindarie Regional Council Chief Executive Officer to explore the opportunities and risks associated with the amalgamation of the MRC and the TPRC. 2. Requests the MRC Chief Executive Officer to prepare a report on this subject to be brought to the Ordinary Council meeting on 24 November 2022.	For Information
	11.2	That Council: 1. Requests the Chief Executive Officer to prepare a report for the 24 November 2022 Ordinary Council meeting on the various options and viability of using the MRC facility at Neerabup for recycling strategies including general recycling and specific product recycling such as TVs.	For Information
07.07.2022	10.1	That the Minutes of the Ordinary Meeting of Council held on 26 May 2022 be confirmed as a true record of the proceedings.	For Information
	11.1	That Council: Receive the Financial Statements set out in Appendix No. 1 for the month ended 31 May 2022.	For Information
	11.2	That Council: Note the list of payments made under delegated authority to the Chief Executive Officer, for the month ended 31 May 2022.	For Information
	11.3	That Council: 1. Approves the proposed amendment to the Mindarie Regional Council Waste Facility Site Amended Local Law 2022 as detailed in Appendix 4 for the purposes of public advertising, under section 3.16 of the Local Government Act 1995; and 2. Notes that the MRC is to invite submissions to the amended Mindarie Regional Council Waste Facility Site Amended Local Law 2022 by way of a statewide public notice; and 3. Notes that a copy of the proposed amendment to the Mindarie Regional Council Waste Facility Site Amended Local Law 2022 will be sent to the Minister for Local Government under section 3.12 of the Act and the Minister for Environment administering the Waste Avoidance and Resource Recovery Act 2007; and 1. Notes that the matter will be referred back to the Council after the last day for submissions in relation to the proposed amendment to the Mindarie Regional Council Waste Facility Site Amended Local Law 2022.	Completed

11.4	<p>That Council:</p> <p>(i) adopt the Budget for the Mindarie Regional Council for 2022/23 financial year.</p> <p>(ii) endorse the on-going strategy of deferred payment of operational surpluses, as approved by Council at its August 2005 meeting, for the 2005/06 financial year and future years to meet its on-going capital requirements.</p> <p>(iii) Approve the Capital Budget Program of \$7,340,062 for 2022/23 as follows:</p> <p><u>New capital expenditures</u></p> <table border="0" style="width: 100%;"> <tr> <td style="width: 80%;">• Buildings</td> <td style="text-align: right;">150,000</td> </tr> <tr> <td>• Office furniture and equipment</td> <td style="text-align: right;">-</td> </tr> <tr> <td>• Computer equipment</td> <td style="text-align: right;">45,000</td> </tr> <tr> <td>• Plant and equipment and vehicles</td> <td style="text-align: right;">-</td> </tr> <tr> <td>• Infrastructure</td> <td style="text-align: right;">7,145,062</td> </tr> <tr> <td>Total Capital Expenditure</td> <td style="text-align: right;">7,340,062</td> </tr> </table> <p>(v) approve that \$596,079 will be transferred from the Operating Surplus to the Site Rehabilitation Reserve.</p> <p>(vi) Approve that \$6,987,000 will be transferred from the Site Rehabilitation Reserve for Landfill Infrastructure Capital works.</p> <p>(vii) approve that \$353,062 be transferred from the Reserve for Capital Expenditure to Operating Surplus to fund capital expenditures.</p> <p>(viii) approve that any funds required for carbon abatement projects be transferred from the Carbon Abatement Reserve to the Operating Surplus.</p> <p>(ix) approve that all interest earned on cash funds associated with cash-backed reserves will not be credited to the respective reserves.</p>	• Buildings	150,000	• Office furniture and equipment	-	• Computer equipment	45,000	• Plant and equipment and vehicles	-	• Infrastructure	7,145,062	Total Capital Expenditure	7,340,062	Completed
• Buildings	150,000													
• Office furniture and equipment	-													
• Computer equipment	45,000													
• Plant and equipment and vehicles	-													
• Infrastructure	7,145,062													
Total Capital Expenditure	7,340,062													
16.1	<p>Substantive Motion</p> <p>That Council:</p> <p>1. Award the tender for the auction of landfill capacity financial year 2022/23 (Tender Number: 13/154) to Cleanaway Pty Ltd, Kelair Holdings Pty Ltd and West Tip, and</p> <p>2. Authorises the CEO to inform the unsuccessful tenderers of the decision.</p> <p>RESOLVED</p> <p>That the recommendation be adopted</p>	Completed												
16.2	<p>That Council:</p> <p>1. Award the tender for the crushing and screening of Tamala Park quarry limestone (Tender Number: 13/157) to WA Limestone Contracting Pty Ltd.</p>	Completed												
16.3	<p>That Council:</p> <p>1. Note the Green Deal Alliance progress report.</p>	For Information												

MINUTES – MUNICIPAL WASTE ADVISORY COUNCIL (MWAC)

Submission on the Discussion paper: Proposal to expand the scope of eligible containers in Queensland's Container Refund Scheme – Containers for Change

January 2023

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission therefore represents the consolidated view of Western Australian Local Governments. Individual Local Governments and Regional Councils may have views that differ from the positions taken here.

MWAC will consider this Submission at the next meeting on Wednesday, 22 February 2023.

Introduction

WALGA welcomes the opportunity to comment on the Queensland Government's [Discussion Paper: Proposal to expand the scope of eligible containers in Queensland's Container Refund Scheme - Containers for Change.](#)

Since its introduction in November 2018, the Queensland Container Deposit Scheme, known as Containers for Change, has seen more than 5.6 billion containers returned through its 359 container refund points. The Queensland Government is seeking feedback from community, industry and government sectors on proposed expansion of the Scheme.

The Discussion Paper presents the option to expand the Scheme by including wine and spirit bottles and increasing the size of containers already accepted, in order to deliver further benefits to the community.

South Australia undertook a consultation process, between 2019 and 2021, to gauge community and industry feedback on proposed changes to the State's Container Deposit Scheme. This consultation showed broad support for expanding the range of beverage containers included in the SA Scheme. The New South Wales Environment Protection Authority (EPA) recently undertook a similar consultation, while Western Australia is also seeking feedback on a proposed Scheme expansion.

WALGA acknowledges the significant environmental and community benefits provided by individual schemes since their inception, and that the reviews present an opportunity for aligning the scope of containers across jurisdictions to assist in developing consistent national frameworks and messaging. Many products are sold into the national market so ensuring a the scope of Schemes is the same will allow consistent labelling and reduce any potential consumer confusion.

WALGA's [Policy Statement on Container Deposit Schemes](#) has been used as a basis for this Submission. The following criteria, taken from the WALGA Policy Statement, have been used to assess whether there is benefit in including these materials in the Scheme:

- a) *Does the material or container type cause significant environmental or social impacts?*
- b) *Does the material or container type cause significant costs for waste processors?*
- c) *Does the material or container type have unrealised potential for recycling / resource recovery?*
- d) *Is the material or container type likely to be disposed of illegally?*
- e) *Does the material or container type cause significant community concern?*
- f) *Is there an alternative system in place to recover the material or container type effectively?*

This Submission provides feedback on the proposed scope and type of materials to be included in an expanded Queensland Containers for Change Scheme.

Comments

The expansion of the Containers for Change Scheme is proposed to include glass wine and spirit bottles, alongside increased size limits for beverages already included in the Scheme.

1. Do you support more containers being accepted for a refund as part of Queensland's container refund scheme, Containers for Change?

The expansion in scope of containers in the Queensland scheme will deliver a range of benefits, including increased recovery of glass. This will lead to cleaner recycling streams, further reduction in litter and clearer messaging on Scheme eligibility.

2. Do you support glass wine bottles between 150ml and 3 litres being eligible for a refund?

3. Do you support glass pure spirit bottles between 150ml and 3 litres being eligible for a refund?

The inclusion of glass wine and spirit bottles is supported, as these changes will reduce community confusion around accepted items and provide more incentive to participate at both household and commercial level. While the Discussion Paper does not provide an estimate of the increased number of glass containers expected through the proposed expansion, the further diversion of glass from kerbside recycling is expected to contribute to cleaner recycling streams and greater efficiencies in kerbside service due to weight reduction.

4. The current size limit for flavoured milk, pure vegetable and fruit juice, and water and wine aseptic packs is 1 litre. Do you think the size limit of these containers should be increased to 3 litres?

The increase in size limit for these containers is supported as including larger container sizes will simplify messaging around eligible containers and provide more incentive to participate in the Scheme, as both households and commercial premises may be utilising a wide range of containers in their daily operations.

Plain milk containers, health tonics, cordials and concentrated fruit and vegetable juices intended to be diluted before consumption are proposed to remain excluded. The proposed changes for each container type are outlined in Table 1.

The continued exclusion of plain milk and milk alternative containers from an expanded Scheme has not been addressed in detail in the Discussion Paper, however these items were originally excluded from the Scheme on the basis they are a staple item in most households and are not considered a significant litter item.

WALGA acknowledges these points, however, based on an assessment against the criteria included in the WALGA Policy Statement, considers these materials should be included in an expanded Scheme. This would contribute to higher recovery rates of quality materials and provide further incentive for householders to divert these materials from landfill, particularly in areas where kerbside recycling may not be accessible. Inclusion of plain milk, and milk alternative, containers has the potential to increase commercial participation in the Scheme, through the high volume of container types used by the hospitality sector.

Consultation feedback from South Australia conducted in 2021 indicated a high level of interest in including milk containers in an expanded Scheme, with only 12 per cent of respondents in favour of continuing to exclude plain milk containers.¹ The inclusion of cordial and concentrated fruit juice containers would align the Queensland Scheme proposed Scheme expansions in South Australia, New South Wales and Western Australia as well as reducing community confusion over eligibility.

Table 1: A summary of the current and proposed container types

Beverage type	Accepted in current scheme	Proposed inclusions	WALGA Comment
Wine and spirits	Wine and spirits in plastic containers from 150ml to 3L Wine sachets (plastic and/or foil) 150ml – 250ml Wine in aseptic packs 150ml – 1L	Wine and spirits in glass containers from 150ml to 3L Wine sachets (plastic and/or foil) 250ml – 3L Wine in aseptic packs 1L – 3L	Support
Fruit and vegetable juice	All container types 150ml – 1L	All container types 1L-3L	Support
Flavoured milk	All container types 150ml – 1L	All container types 1L – 3L	Support
Concentrated fruit and vegetable juice (intended for dilution)	Not accepted	Not accepted	Suggest including in the Scheme
Cordial (undiluted)	Not accepted	Not accepted	Suggest including in the Scheme
Flavoured alcoholic beverages with a wine base	Aseptic packs 150ml – 1L	Aseptic packs 1L – 3L	Support
Plain milk and milk substitutes	Not accepted	Not accepted	Suggest including in the Scheme
Registered health tonics	Not accepted	Not accepted	Support continued exclusion

¹ [Improving South Australia's Recycling makes cents – Consultation summary report](#)

Submission on the Discussion paper: Container deposit scheme – Expanding the scope of eligible beverage containers

February 2023

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission therefore represents the consolidated view of Western Australian Local Government. However, individual Local Governments and Regional Councils may have views that differ from the positions taken here.

This Draft Submission is for Local Government comment. Please provide feedback by **COB 27 March 2023** to waste@walga.asn.au.

Introduction

WALGA welcomes the opportunity to comment on the Department of Water and Environmental Regulation's (DWER) [Discussion paper: Container deposit scheme – Expanding the scope of eligible beverage containers](#).

Since its introduction in October 2020, the WA Container Deposit Scheme, Containers for Change, has seen more than 1.5 billion containers returned and recovered through refund points and Material Recovery Facilities (MRFs).

The benefits of Containers for Change have been far reaching, generating more than 800 jobs within the WA community in addition to the environmental benefits of reducing litter and increasing material recovery across the state. The Scheme supports the WA [Waste Avoidance and Resource Recovery Strategy 2030](#), by promoting the recovery of more, and higher quality and value and resources, from waste.

The Scheme Coordinator, WA Return Recycle Renew Limited (WARRRL), is required by the legislation to achieve 85 per cent of eligible containers by the end of the 2023-24 financial year. As of November 2022, the Scheme recovery rate averaged 64 per cent, a significant increase on the pre-Scheme rate of 34 per cent.

The Department is seeking feedback from community, industry and government sectors on proposed expansion of the Containers for Change Scheme. The Discussion Paper presents the option to expand the Scheme by including wine and spirit bottles and increasing the size of containers already accepted, in order to deliver further benefits to the community.

South Australia undertook a consultation process, between 2019 and 2021, to gauge community and industry feedback on proposed changes to the state's Container Deposit Scheme. This consultation showed broad support for expanding the range of beverage containers included in the SA Scheme. The New South Wales Environment Protection

Authority (NSW EPA) and Queensland Department of Environment and Science undertook similar consultations in late 2022/early 2023.

WALGA acknowledges the significant environmental and community benefits provided by individual schemes since their inception, and that the reviews present an opportunity for aligning the scope of containers across Australia to assist in developing consistent national frameworks and messaging. WALGA's [Policy Statement on Container Deposit Schemes](#) has been used as a basis for this Submission. The following criteria, taken from the WALGA Policy Statement, have been used to assess whether there is benefit in including these materials in the Scheme:

- a) *Does the material or container type cause significant environmental or social impacts?*
- b) *Does the material or container type cause significant costs for waste processors?*
- c) *Does the material or container type have unrealised potential for recycling / resource recovery?*
- d) *Is the material or container type likely to be disposed of illegally?*
- e) *Does the material or container type cause significant community concern?*
- f) *Is there an alternative system in place to recover the material or container type effectively?*

This Submission provides feedback on the proposed scope and type of materials to be included in an expanded WA Container Deposit Scheme.

Proposed Expansion of the WA Container Deposit Scheme

The expansion proposed by DWER, of the WA Container Deposit Scheme, focuses on inclusion of glass wine and spirit bottles, alongside increased size limits for beverage containers already included in the Scheme. The proposed changes for each container type are outlined in Table 1.

The expansion in scope of containers in the WA Scheme will deliver a range of benefits, including increased diversion of glass from kerbside recycling bins. This will lead to cleaner streams of separated material for processing, further reduction of litter and clearer messaging on eligibility.

The inclusion of glass wine and spirit bottles is supported.

These changes will reduce community confusion around accepted items and potentially provide more incentive to participate in the Scheme at both household and commercial level. While the Discussion Paper does not provide a specific estimate of the increased number of glass containers expected through the proposed expansion, the further diversion of glass from kerbside recycling is expected to contribute to cleaner recycling streams and greater efficiencies in kerbside service due to weight reduction.

Modelling undertaken by South Australia has estimated expanding their Scheme to include glass wine and spirit bottles, as well as increasing the size of currently accepted containers, has the potential to reduce the amount of glass in kerbside bins by 15% with a saving to Local Governments of \$34 million in waste management costs.

While similar modelling has not been undertaken for Western Australia, the Discussion Paper estimates an additional 45 million 'expanded scope' glass containers were collected through the kerbside recycling system in 2021. Many of these containers would be diverted from kerbside under the proposed expansion, reducing costs for kerbside

recycling. Currently, non-Container Deposit Scheme glass costs to recycle, its removal from kerbside is likely to have a positive financial impact.

The increase in size limits, of up to 3L for containers already accepted in the Scheme, is supported.

Including larger container sizes will simplify messaging regarding eligible containers and provide more incentive to participate in the Scheme, as both households and commercial premises may be utilising a wide range of containers in their daily operations.

Feedback from Material Recovery Facility operators indicates increased numbers of larger containers, primarily water containers between 5 and 10 litres, are being received through MRFs but are not able to be readily processed alongside smaller containers.

Recommendation: The collection of larger beverage containers up to 10L be investigated as part of an expanded Scheme.

Plain milk and alternative milk containers

Plain milk containers and registered health tonics are proposed to remain excluded from the Scheme. The continued exclusion of plain milk and alternative milk containers from an expanded Scheme has not been addressed in detail in the Discussion Paper, however these items were originally excluded from the Scheme on the basis they are a staple item in most households, including low-income households, and are not considered a significant litter item.

WALGA acknowledges these points, however, based on an assessment against the criteria included in the WALGA Policy Statement, considers that these materials should be included in an expanded Scheme. This would contribute to the recovery of higher rates of quality materials and provide further incentive for householders to divert these materials from landfill, particularly in areas where kerbside recycling may not be accessible. Consultation feedback from South Australia conducted in 2021 indicated a high level of interest in including milk containers in an expanded Scheme, with only 12 per cent of respondents in favour of continuing to exclude plain milk containers.¹

Inclusion of milk and milk alternative containers in the Scheme will not only provide opportunity to recover higher quantities of high value HDPE containers in a cleaner stream, but also offer a recycling option for composite packaging (such as Tetra Pak™), which have very limited recycling process. As the Scheme currently accepts composite packaging containers, of up to 1L size for some beverages, existing recycling arrangements can be leveraged to process these materials.

Community feedback reported by Local Governments and refund point operators shows strong support for these materials to be included in the Scheme. Data collected through Local Government bin tagging and auditing programs shows there is a high level of community confusion around the recyclability of composite packaging such as Tetra Pak™, which are a common contaminant in kerbside recycling bins. The proposed inclusion in the Scheme of these containers for juices and water, while still excluding milk and milk alternatives, is likely to cause further community confusion.

¹ [Improving South Australia's Recycling makes cents – Consultation summary report](#)

Further benefits would be realised through ease and consistency of messaging, as the expanded scope would include all beverage containers community confusion on 'what's in and what's out' of kerbside recycling would be mitigated.

Inclusion of plain milk and milk alternative containers also has the potential to increase commercial participation in the Scheme, through the high volume of container types used by the hospitality sector.

Expansion of products accepted in the Scheme, including plain milk and milk alternative containers, presents an opportunity to capture the full range of beverage containers represented in the comingled recycling bin and therefore improve overall material recovery rates across the State through increased recycling options and incentives.

Recommendation: That plain milk and milk alternative container types be included in an expanded WA Scheme.

Regional Benefits

Western Australia's geography and distance between transport hubs results in high costs to Local Governments when considering the provision of kerbside recycling services to regional and remote communities.

At present, 36 Local Governments in WA do not offer a domestic kerbside recycling service, primarily in the Wheatbelt, Goldfields-Esperance, Kimberley, Pilbara, Midwest and Gascoyne regions².

Of these, 23 Local Governments have access to a Containers for Change collection point within their boundaries. Under the Scheme's minimum network standards, refund points are required to be within a maximum distance of 200km from townsites in remote and very remote areas.

Expansion of the Scheme, to accept as wide a range of beverage containers as possible, including plain milk and milk alternatives, is an opportunity to significantly increase material recovery in regional areas by leveraging the existing network and providing an incentive to consumers to recycle.

The numbers of containers redeemed through regional refund points relative to population has been consistently high, showing community willingness to participate. As many regional sites are smaller operations or flexible refund points, expansion of the Scheme and associated increase in throughput offers an opportunity to increase the viability of existing sites, as well as create new employment opportunities.

Recommendation: Review all sites to ensure sufficient there is sufficient capacity and resourcing to effectively accept and process the estimated increase in containers.

Deposit rate considerations

WALGA's 2017 [Submission](#) on the Scheme establishment recommended the refund amount and handling fees be reviewed within the first two to three years of Scheme operation.

² [Domestic waste and recycling dashboard 2020-21, Waste Authority](#)

Economic modelling undertaken by South Australia showed the highest recycling rate for the SA Scheme would be achieved through increasing the deposit rate from 10c to 20c per container, by providing a greater incentive for consumers to participate.³ Stakeholder feedback was generally in favour of the increase, with the highest number of responses (21%), in favour of increasing the deposit rate in line with inflation and other jurisdictions.

Comparison of container deposit schemes worldwide shows higher overall return rates for schemes offering higher deposit values, coupled with a convenient and accessible return network⁴.

Recommendation: That the 10c deposit rate be reviewed, with the view to a potential increase.

Table 1: A summary of the current and proposed container types

Beverage type	Accepted in current scheme	Proposed inclusions	WALGA Comment
Wine and spirits	Wine and spirits in plastic containers from 150ml to 3L Wine sachets (plastic and/or foil) 150ml – 250ml Wine in aseptic packs 150ml – 1L	Wine and spirits in glass containers from 150ml to 3L Wine sachets (plastic and/or foil) 250ml – 3L Wine in casks/aseptic packs 1L – 3L	Support
Fruit and vegetable juice (less than 90% pure)	All container types 150ml – 3L	All container types 150ml-3L	Support
Flavoured milk	All container types 150ml – 1L	All container types 1L – 3L	Support
Concentrated fruit and vegetable juice (intended for dilution)	All container types 150ml – 1L	All container types 1L – 3L	Support
Cordial (undiluted)	Not accepted	All container types 150mL – 3L	Support
Flavoured alcoholic beverages with a wine base	Aseptic packs 150ml – 1L	Aseptic packs 1L – 3L	Support
Water	All container types 150mL-1L	Cask/aseptic packs 1-3L	Recommend including in the Scheme: Plastic containers 3L-10L

³ [SA Container Deposit Scheme - Economic analysis review \(final report\), December 2020 \(epa.sa.gov.au\)](https://www.epa.sa.gov.au)

⁴ [European Deposit Systems for One-Way Beverage Containers: Comparison of Key Features \(reloopplatform.org\)](https://reloopplatform.org)

Plain milk and milk substitutes	Not accepted	Not accepted	Recommend including in the Scheme: Plastic and glass bottles 150ml-3L Liquid paperboard cartons 150ml – 3L Composite packs 150ml-3L
Registered health tonics	Not accepted	Not accepted	Support continued exclusion

Submission on the Consultation Paper: E-waste to Landfill Ban in Western Australia

February 2023

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA).

WALGA is an independent, member-based, not for profit organisation representing and supporting the WA Local Government sector. WALGA's membership includes all 139 Local Governments in the State. MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission represents the consolidated view of Western Australian Local Governments. Individual Local Governments and Regional Councils may have views that differ from the positions taken here.

Local Governments are invited to provide feedback on the Draft Submission by **COB Tuesday, 21 March** to waste@walga.asn.au.

Introduction

WALGA welcomes the opportunity to provide comment on the Department of Water and Environmental Regulation (DWER) [Consultation Paper: E-Waste to landfill ban in Western Australia](#).

The Western Australian Government has committed to deliver a statewide ban on e-waste disposal to landfill by 2024, with the aim of improving management and recycling of e-waste produced by households and businesses across the State.

Approximately 70,000 tonnes of e-waste (electrical, electronic and battery powered items) are currently generated in WA every year, with an estimated 27 per cent of this material being recycled. Material flows analysis, undertaken on behalf of DWER, shows that the amount of e-waste is expected to increase by 250 per cent to approximately 175,000 tonnes (including batteries and photovoltaics) a year by 2043.

Objectives of the ban include supporting increased recovery of value from e-waste materials, protecting the environment by better management of hazardous products, and expanding the State's e-waste collection, recycling and processing networks. The ban will apply to e-waste collected for the purposes of recycling. Incidental disposal, such as items placed in a kerbside bin, will not be subject to the ban.

The e-waste landfill ban will initially focus on:

Electrical, electronic and battery-powered items that have been collected and aggregated purposes of recycling or recovery that:

- a) are covered by effective product stewardship schemes, particularly those accredited schemes under the Recycling and Waste Reduction Act 2020
- b) have established markets or systems for collection, recycling and processing in Western Australia that can grow with increased supply or that have access to national processing infrastructure
- c) contain recoverable base materials of value, for example metals, including precious metals.

A list of the proposed items to be covered by the ban initially, and in a future phase, are included in Appendix 1.

WALGA acknowledges the objectives of the ban and its alignment to global, national and local environmental and recovery targets, in particular the [Waste Avoidance and Resource Recovery Strategy 2030](#). However, **the implementation of an e-waste to landfill ban by 2024, in its proposed form, will have significant financial implications for Local Governments, and the communities they service.**

In 2006, the then Western Australian Waste Management Board commissioned work to investigate the environmental, social and economic impacts of potential landfill bans on household packaging, building products and organic waste. The WALGA Submission made a key recommendation:

Any future investigations into a potential ban to landfill for any material type only be undertaken as a part of a multi-tool approach incorporating Extended Producer Responsibility programmes and other appropriate policies and mechanisms.

WALGA's 2022 [Submission](#) on the Stewardship for Consumer and Other Electrical and Electronic Products **did not support a landfill ban for e-waste in the absence of a fully effective product stewardship scheme for products which would be subject to the ban.**

While it is acknowledged that there are Product Stewardship Schemes in place for some of the products subject to the ban, such as the National TV and Computer Recycling Scheme (NTCRS) and Flurocycle, a new National Product Stewardship Scheme, anticipated to cover a wider scope of e-waste, is not scheduled for introduction until mid-2025, with on ground implementation timeframes still to be determined.

WALGA reiterates its position that **comprehensive and effective product stewardship schemes must be implemented for products subject to the e-waste landfill ban prior to the ban taking effect.**

Product Stewardship

The "polluter pays" principle requires that producers should pay the full social cost of the products they produce, including the environmental costs.

Product stewardship schemes are based on this principle, and are an instrument to manage the environmental, health and safety impacts (negative externalities) associated the full lifecycle of products and materials. These schemes require that all parties involved in producing, selling or consuming a product have a responsibility for the full environmental, social and economic costs of the product.

Without Product Stewardship arrangements in place for all items covered under the proposed e-waste ban, the burden of managing the product at end of life falls disproportionately to Local Governments.

Many of the items proposed to be banned from landfill in the first stage of implementation (Under Screens, IT and telecommunications in Appendix 1) are accepted under the National Television and Computer Recycling Scheme (NTCRS). The NTCRS was established in 2011 to provide households and small businesses with free access to e-waste recycling, with collection and processing services offered through co-regulatory arrangements with recyclers.

In 2014, the services provided under these arrangements were reduced to the minimum legislated requirements for collected tonnes and number of access points provided. This resulted in reduced services in regional and remote areas of the state and increased costs to all Local Governments or Regional Councils hosting an e-waste drop off site.

A 2021 survey of 29 Local Governments which offer e-waste collection services to the community showed that each Local Government provides staffing, infrastructure and sites which contribute to the in-kind costs of recycling e-waste. The amount of financial in-kind costs varied from \$1,000 - \$150,000 per year per Local Government, for both in and out-of-scope NTCRS products. WALGA understands that recycling of NTCRS material costs \$350 per tonne and e-waste not included in the NTCRS \$700/tonne.

These costs are also distributed inequitably, as they are only borne by those Local Governments or Regional Councils which operate e-waste drop off facilities; and are required to provide a 'free' service to any member of the community. The Local Governments and Regional Councils which operate these facilities are effectively subsidising the e-waste recycling costs for residents from other Local Governments.

Flurocycle, the voluntary national product stewardship scheme, does not provide any funding for recycling of fluorescent lighting. 22,403 kg of fluorescent lighting materials were collected through the Household Hazardous Waste Program in 2021-22 and cost \$70,568 to recycle, excluding transport. This material comprised 5 per cent of the overall material collected through the HHW Program.

Regional considerations

Due to Western Australia's dispersed population, transport costs have a significant impact on the viability of collection mechanisms in regional and remote areas.

Individual collection sites within the Perth metropolitan area have reported costs of up to \$1,000 per tonne for staffing, sorting, transport and recycling of both in and out-of-scope NTCRS products. This cost will be significantly higher for regional areas due to required transport distances and limited economies of scale. Consumers, Local Governments and retailers operating in regional and remote areas of WA are subject to higher than average costs of living and operation, which places added pressure on meeting any additional costs outside of scheme operations.

WALGA's 2006 submission on the investigation into landfill bans made the following recommendation:

That investigation of any proposed regulatory waste management instrument incorporate a triple bottom line impact analysis applied specifically to the Western Australian context.

While a [cost benefit analysis](#) has been undertaken and provided alongside the discussion paper, feedback from Local Governments has highlighted that the figures used, particularly regarding transport cost, do not reflect the costs experienced in regional Western Australia. For example, the figure used for transport cost of \$100 per tonne has been slightly

increased from the tonne per kilometre rate in a Victorian study and based on an average transport distance of less than 50km. Applying this rate to a remote Western Australian context would result in costs per tonne of approximately \$5,000 for transport of e-waste from the Kimberley to Perth, which is not a realistic or viable cost and disproportionately disadvantages regional and remote Local Governments.

The cost benefit analysis and discussion paper have not clearly delineated the disproportionate costs between metropolitan and regional collection points, by applying a standard cost across the state which primarily reflects a metropolitan perspective. In order to present a more accurate figure, consultation with regional Local Governments is recommended to assess current transport costs and incorporate this into an overall cost per tonne.

The additional cost to regional Local Governments not currently collecting e-waste would include ensuring sites are appropriately licenced to collect e-waste for recycling, potentially installing collection infrastructure, ongoing maintenance and resourcing of the collection site, transport costs to an approved recycler and recycling costs. WALGA has received feedback from a number of Local Governments expressing considerable concern regarding their ability to resource such a requirement.

Conclusion

WALGA acknowledges the provision of grant funding to assist in increasing the capacity of recyclers in WA to accept increasing amounts of e-waste and to assist with collection and reuse.

However, Local Governments would be better supported by ensuring effective product stewardship schemes are in place for all materials which are included in the bans, or alternative funding schemes are put in place to cover additional costs, rather than these costs being borne by Local Governments and the community.

Appendix 1: Scope of products covered by the landfill ban (initial and future)

Table B1: Categories and item examples

	Category	Item examples (sourced from UNU-Keys)
Western Australian e-waste ban initial scope	Screens, IT, and tele - communications	Laptops and tablets
		Cathode Ray Tube Monitors and Televisions
		Flat Display Panel Monitors (LCD, LED)
		Flat Display Panel Televisions (LCD, LED, PDP)
		Professional IT (servers, routers, data storage, copiers)
		Small IT (routers, mice, keyboards, external drives, accessories)
		Desktop PCs and printers (including scanners and faxes)
		Mobile Phones (including smartphones and pagers)
	Lighting and lamps	Telecom (cordless phones, answering machines etc.)
		Compact fluorescent lamps
		Straight tube fluorescent lamps
		Special (mercury, high and low pressure, sodium vapour, other professional lamps)
		LED
	Large household appliances	Lamps (pocket, Christmas)
		Luminaires (including household incandescent fittings)
		Dishwashers
		Kitchen (large furnaces, ovens, cooking equipment)
		Washing Machines (including combined dryers)
	Batteries	Dryers (wash dryers, centrifuges)
Large leisure (including large toys, exercise, large musical instruments)		
Temperature exchange equipment	Dispenser (non-cooled vending, coffee, tickets, etc.)	
	Batteries including those in the Household Hazardous Waste program and the Commonwealth Battery Stewardship Scheme.	
	Lead acid batteries	
	Freezers and Fridges (including combi-fridges)	
	Air Conditioners (household installed and portable)	
Medical devices	Other Cooling (dehumidifiers, heat pump dryers)	
	Professional Cooling (large air conditioners, cooling displays)	
Future phase	Photovoltaics	Dispenser (cooled vending, bottles, candy, etc.)
		Heating and Ventilation (household and professional)
	Small household appliances	Professional medical (hospital, dentist, diagnostics, etc.)
		All items listed under the future Commonwealth Photovoltaic Systems Product Stewardship Scheme (anticipated for 2022/23)
		Microwaves (including combined, excluding grills)
		Other Small Household (small ventilators, irons, clocks, adapters)
		Food (toaster, grills, food processing, frying pans)
		Hot Water (coffee, tea, water cookers)
		Vacuum Cleaners (excluding professional)
		Personal Care (toothbrushes, hair dryers, razors)
		Small Consumer Electronics (headphones, remote controls)
		Portable Audio and Video (MP3, e-readers, car navigation)
		Music Instruments, Radio, HiFi (including audio sets)
		Video (video recorders, DVD, Blu-ray, set-top boxes)
		Speakers
		Cameras (camcorders, photo, and digital still cameras)
		Tools (all household saws, drills, cleaning, garden, etc.)
Toys (small toys, vehicles, small music)		
Monitoring and control equipment	Game Consoles (video games and consoles)	
	Monitoring (professional monitoring and control, garage, diagnostic, etc.)	
	Monitoring (alarm, heat, smoke, security, excluding screens)	
		Household health monitoring (small thermometers, blood pressure meters)

Submission on the Discussion paper: Proposal to expand the scope of eligible containers in Queensland's Container Refund Scheme – Containers for Change

January 2023

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission therefore represents the consolidated view of Western Australian Local Governments. Individual Local Governments and Regional Councils may have views that differ from the positions taken here.

MWAC will consider this Submission at the next meeting on Wednesday, 22 February 2023.

Introduction

WALGA welcomes the opportunity to comment on the Queensland Government's [Discussion Paper: Proposal to expand the scope of eligible containers in Queensland's Container Refund Scheme - Containers for Change.](#)

Since its introduction in November 2018, the Queensland Container Deposit Scheme, known as Containers for Change, has seen more than 5.6 billion containers returned through its 359 container refund points. The Queensland Government is seeking feedback from community, industry and government sectors on proposed expansion of the Scheme.

The Discussion Paper presents the option to expand the Scheme by including wine and spirit bottles and increasing the size of containers already accepted, in order to deliver further benefits to the community.

South Australia undertook a consultation process, between 2019 and 2021, to gauge community and industry feedback on proposed changes to the State's Container Deposit Scheme. This consultation showed broad support for expanding the range of beverage containers included in the SA Scheme. The New South Wales Environment Protection Authority (EPA) recently undertook a similar consultation, while Western Australia is also seeking feedback on a proposed Scheme expansion.

WALGA acknowledges the significant environmental and community benefits provided by individual schemes since their inception, and that the reviews present an opportunity for aligning the scope of containers across jurisdictions to assist in developing consistent national frameworks and messaging. Many products are sold into the national market so ensuring a the scope of Schemes is the same will allow consistent labelling and reduce any potential consumer confusion.

WALGA's [Policy Statement on Container Deposit Schemes](#) has been used as a basis for this Submission. The following criteria, taken from the WALGA Policy Statement, have been used to assess whether there is benefit in including these materials in the Scheme:

- a) *Does the material or container type cause significant environmental or social impacts?*
- b) *Does the material or container type cause significant costs for waste processors?*
- c) *Does the material or container type have unrealised potential for recycling / resource recovery?*
- d) *Is the material or container type likely to be disposed of illegally?*
- e) *Does the material or container type cause significant community concern?*
- f) *Is there an alternative system in place to recover the material or container type effectively?*

This Submission provides feedback on the proposed scope and type of materials to be included in an expanded Queensland Containers for Change Scheme.

Comments

The expansion of the Containers for Change Scheme is proposed to include glass wine and spirit bottles, alongside increased size limits for beverages already included in the Scheme.

1. Do you support more containers being accepted for a refund as part of Queensland's container refund scheme, Containers for Change?

The expansion in scope of containers in the Queensland scheme will deliver a range of benefits, including increased recovery of glass. This will lead to cleaner recycling streams, further reduction in litter and clearer messaging on Scheme eligibility.

2. Do you support glass wine bottles between 150ml and 3 litres being eligible for a refund?

3. Do you support glass pure spirit bottles between 150ml and 3 litres being eligible for a refund?

The inclusion of glass wine and spirit bottles is supported, as these changes will reduce community confusion around accepted items and provide more incentive to participate at both household and commercial level. While the Discussion Paper does not provide an estimate of the increased number of glass containers expected through the proposed expansion, the further diversion of glass from kerbside recycling is expected to contribute to cleaner recycling streams and greater efficiencies in kerbside service due to weight reduction.

4. The current size limit for flavoured milk, pure vegetable and fruit juice, and water and wine aseptic packs is 1 litre. Do you think the size limit of these containers should be increased to 3 litres?

The increase in size limit for these containers is supported as including larger container sizes will simplify messaging around eligible containers and provide more incentive to participate in the Scheme, as both households and commercial premises may be utilising a wide range of containers in their daily operations.

Plain milk containers, health tonics, cordials and concentrated fruit and vegetable juices intended to be diluted before consumption are proposed to remain excluded. The proposed changes for each container type are outlined in Table 1.

The continued exclusion of plain milk and milk alternative containers from an expanded Scheme has not been addressed in detail in the Discussion Paper, however these items were originally excluded from the Scheme on the basis they are a staple item in most households and are not considered a significant litter item.

WALGA acknowledges these points, however, based on an assessment against the criteria included in the WALGA Policy Statement, considers these materials should be included in an expanded Scheme. This would contribute to higher recovery rates of quality materials and provide further incentive for householders to divert these materials from landfill, particularly in areas where kerbside recycling may not be accessible. Inclusion of plain milk, and milk alternative, containers has the potential to increase commercial participation in the Scheme, through the high volume of container types used by the hospitality sector.

Consultation feedback from South Australia conducted in 2021 indicated a high level of interest in including milk containers in an expanded Scheme, with only 12 per cent of respondents in favour of continuing to exclude plain milk containers.¹ The inclusion of cordial and concentrated fruit juice containers would align the Queensland Scheme proposed Scheme expansions in South Australia, New South Wales and Western Australia as well as reducing community confusion over eligibility.

Table 1: A summary of the current and proposed container types

Beverage type	Accepted in current scheme	Proposed inclusions	WALGA Comment
Wine and spirits	Wine and spirits in plastic containers from 150ml to 3L Wine sachets (plastic and/or foil) 150ml – 250ml Wine in aseptic packs 150ml – 1L	Wine and spirits in glass containers from 150ml to 3L Wine sachets (plastic and/or foil) 250ml – 3L Wine in aseptic packs 1L – 3L	Support
Fruit and vegetable juice	All container types 150ml – 1L	All container types 1L-3L	Support
Flavoured milk	All container types 150ml – 1L	All container types 1L – 3L	Support
Concentrated fruit and vegetable juice (intended for dilution)	Not accepted	Not accepted	Suggest including in the Scheme
Cordial (undiluted)	Not accepted	Not accepted	Suggest including in the Scheme
Flavoured alcoholic beverages with a wine base	Aseptic packs 150ml – 1L	Aseptic packs 1L – 3L	Support
Plain milk and milk substitutes	Not accepted	Not accepted	Suggest including in the Scheme
Registered health tonics	Not accepted	Not accepted	Support continued exclusion

¹ [Improving South Australia's Recycling makes cents – Consultation summary report](#)

Submission on the Discussion paper: Container deposit scheme – Expanding the scope of eligible beverage containers

February 2023

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA). MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission therefore represents the consolidated view of Western Australian Local Government. However, individual Local Governments and Regional Councils may have views that differ from the positions taken here.

This Draft Submission is for Local Government comment. Please provide feedback by **COB 27 March 2023** to waste@walga.asn.au.

Introduction

WALGA welcomes the opportunity to comment on the Department of Water and Environmental Regulation's (DWER) [Discussion paper: Container deposit scheme – Expanding the scope of eligible beverage containers](#).

Since its introduction in October 2020, the WA Container Deposit Scheme, Containers for Change, has seen more than 1.5 billion containers returned and recovered through refund points and Material Recovery Facilities (MRFs).

The benefits of Containers for Change have been far reaching, generating more than 800 jobs within the WA community in addition to the environmental benefits of reducing litter and increasing material recovery across the state. The Scheme supports the WA [Waste Avoidance and Resource Recovery Strategy 2030](#), by promoting the recovery of more, and higher quality and value and resources, from waste.

The Scheme Coordinator, WA Return Recycle Renew Limited (WARRRL), is required by the legislation to achieve 85 per cent of eligible containers by the end of the 2023-24 financial year. As of November 2022, the Scheme recovery rate averaged 64 per cent, a significant increase on the pre-Scheme rate of 34 per cent.

The Department is seeking feedback from community, industry and government sectors on proposed expansion of the Containers for Change Scheme. The Discussion Paper presents the option to expand the Scheme by including wine and spirit bottles and increasing the size of containers already accepted, in order to deliver further benefits to the community.

South Australia undertook a consultation process, between 2019 and 2021, to gauge community and industry feedback on proposed changes to the state's Container Deposit Scheme. This consultation showed broad support for expanding the range of beverage containers included in the SA Scheme. The New South Wales Environment Protection

Authority (NSW EPA) and Queensland Department of Environment and Science undertook similar consultations in late 2022/early 2023.

WALGA acknowledges the significant environmental and community benefits provided by individual schemes since their inception, and that the reviews present an opportunity for aligning the scope of containers across Australia to assist in developing consistent national frameworks and messaging. WALGA's [Policy Statement on Container Deposit Schemes](#) has been used as a basis for this Submission. The following criteria, taken from the WALGA Policy Statement, have been used to assess whether there is benefit in including these materials in the Scheme:

- a) *Does the material or container type cause significant environmental or social impacts?*
- b) *Does the material or container type cause significant costs for waste processors?*
- c) *Does the material or container type have unrealised potential for recycling / resource recovery?*
- d) *Is the material or container type likely to be disposed of illegally?*
- e) *Does the material or container type cause significant community concern?*
- f) *Is there an alternative system in place to recover the material or container type effectively?*

This Submission provides feedback on the proposed scope and type of materials to be included in an expanded WA Container Deposit Scheme.

Proposed Expansion of the WA Container Deposit Scheme

The expansion proposed by DWER, of the WA Container Deposit Scheme, focuses on inclusion of glass wine and spirit bottles, alongside increased size limits for beverage containers already included in the Scheme. The proposed changes for each container type are outlined in Table 1.

The expansion in scope of containers in the WA Scheme will deliver a range of benefits, including increased diversion of glass from kerbside recycling bins. This will lead to cleaner streams of separated material for processing, further reduction of litter and clearer messaging on eligibility.

The inclusion of glass wine and spirit bottles is supported.

These changes will reduce community confusion around accepted items and potentially provide more incentive to participate in the Scheme at both household and commercial level. While the Discussion Paper does not provide a specific estimate of the increased number of glass containers expected through the proposed expansion, the further diversion of glass from kerbside recycling is expected to contribute to cleaner recycling streams and greater efficiencies in kerbside service due to weight reduction.

Modelling undertaken by South Australia has estimated expanding their Scheme to include glass wine and spirit bottles, as well as increasing the size of currently accepted containers, has the potential to reduce the amount of glass in kerbside bins by 15% with a saving to Local Governments of \$34 million in waste management costs.

While similar modelling has not been undertaken for Western Australia, the Discussion Paper estimates an additional 45 million 'expanded scope' glass containers were collected through the kerbside recycling system in 2021. Many of these containers would be diverted from kerbside under the proposed expansion, reducing costs for kerbside

recycling. Currently, non-Container Deposit Scheme glass costs to recycle, its removal from kerbside is likely to have a positive financial impact.

The increase in size limits, of up to 3L for containers already accepted in the Scheme, is supported.

Including larger container sizes will simplify messaging regarding eligible containers and provide more incentive to participate in the Scheme, as both households and commercial premises may be utilising a wide range of containers in their daily operations.

Feedback from Material Recovery Facility operators indicates increased numbers of larger containers, primarily water containers between 5 and 10 litres, are being received through MRFs but are not able to be readily processed alongside smaller containers.

Recommendation: The collection of larger beverage containers up to 10L be investigated as part of an expanded Scheme.

Plain milk and alternative milk containers

Plain milk containers and registered health tonics are proposed to remain excluded from the Scheme. The continued exclusion of plain milk and alternative milk containers from an expanded Scheme has not been addressed in detail in the Discussion Paper, however these items were originally excluded from the Scheme on the basis they are a staple item in most households, including low-income households, and are not considered a significant litter item.

WALGA acknowledges these points, however, based on an assessment against the criteria included in the WALGA Policy Statement, considers that these materials should be included in an expanded Scheme. This would contribute to the recovery of higher rates of quality materials and provide further incentive for householders to divert these materials from landfill, particularly in areas where kerbside recycling may not be accessible. Consultation feedback from South Australia conducted in 2021 indicated a high level of interest in including milk containers in an expanded Scheme, with only 12 per cent of respondents in favour of continuing to exclude plain milk containers.¹

Inclusion of milk and milk alternative containers in the Scheme will not only provide opportunity to recover higher quantities of high value HDPE containers in a cleaner stream, but also offer a recycling option for composite packaging (such as Tetra Pak™), which have very limited recycling process. As the Scheme currently accepts composite packaging containers, of up to 1L size for some beverages, existing recycling arrangements can be leveraged to process these materials.

Community feedback reported by Local Governments and refund point operators shows strong support for these materials to be included in the Scheme. Data collected through Local Government bin tagging and auditing programs shows there is a high level of community confusion around the recyclability of composite packaging such as Tetra Pak™, which are a common contaminant in kerbside recycling bins. The proposed inclusion in the Scheme of these containers for juices and water, while still excluding milk and milk alternatives, is likely to cause further community confusion.

¹ [Improving South Australia's Recycling makes cents – Consultation summary report](#)

Further benefits would be realised through ease and consistency of messaging, as the expanded scope would include all beverage containers community confusion on 'what's in and what's out' of kerbside recycling would be mitigated.

Inclusion of plain milk and milk alternative containers also has the potential to increase commercial participation in the Scheme, through the high volume of container types used by the hospitality sector.

Expansion of products accepted in the Scheme, including plain milk and milk alternative containers, presents an opportunity to capture the full range of beverage containers represented in the comingled recycling bin and therefore improve overall material recovery rates across the State through increased recycling options and incentives.

Recommendation: That plain milk and milk alternative container types be included in an expanded WA Scheme.

Regional Benefits

Western Australia's geography and distance between transport hubs results in high costs to Local Governments when considering the provision of kerbside recycling services to regional and remote communities.

At present, 36 Local Governments in WA do not offer a domestic kerbside recycling service, primarily in the Wheatbelt, Goldfields-Esperance, Kimberley, Pilbara, Midwest and Gascoyne regions².

Of these, 23 Local Governments have access to a Containers for Change collection point within their boundaries. Under the Scheme's minimum network standards, refund points are required to be within a maximum distance of 200km from townsites in remote and very remote areas.

Expansion of the Scheme, to accept as wide a range of beverage containers as possible, including plain milk and milk alternatives, is an opportunity to significantly increase material recovery in regional areas by leveraging the existing network and providing an incentive to consumers to recycle.

The numbers of containers redeemed through regional refund points relative to population has been consistently high, showing community willingness to participate. As many regional sites are smaller operations or flexible refund points, expansion of the Scheme and associated increase in throughput offers an opportunity to increase the viability of existing sites, as well as create new employment opportunities.

Recommendation: Review all sites to ensure sufficient there is sufficient capacity and resourcing to effectively accept and process the estimated increase in containers.

Deposit rate considerations

WALGA's 2017 [Submission](#) on the Scheme establishment recommended the refund amount and handling fees be reviewed within the first two to three years of Scheme operation.

² [Domestic waste and recycling dashboard 2020-21, Waste Authority](#)

Economic modelling undertaken by South Australia showed the highest recycling rate for the SA Scheme would be achieved through increasing the deposit rate from 10c to 20c per container, by providing a greater incentive for consumers to participate.³ Stakeholder feedback was generally in favour of the increase, with the highest number of responses (21%), in favour of increasing the deposit rate in line with inflation and other jurisdictions.

Comparison of container deposit schemes worldwide shows higher overall return rates for schemes offering higher deposit values, coupled with a convenient and accessible return network⁴.

Recommendation: That the 10c deposit rate be reviewed, with the view to a potential increase.

Table 1: A summary of the current and proposed container types

Beverage type	Accepted in current scheme	Proposed inclusions	WALGA Comment
Wine and spirits	Wine and spirits in plastic containers from 150ml to 3L Wine sachets (plastic and/or foil) 150ml – 250ml Wine in aseptic packs 150ml – 1L	Wine and spirits in glass containers from 150ml to 3L Wine sachets (plastic and/or foil) 250ml – 3L Wine in casks/aseptic packs 1L – 3L	Support
Fruit and vegetable juice (less than 90% pure)	All container types 150ml – 3L	All container types 150ml-3L	Support
Flavoured milk	All container types 150ml – 1L	All container types 1L – 3L	Support
Concentrated fruit and vegetable juice (intended for dilution)	All container types 150ml – 1L	All container types 1L – 3L	Support
Cordial (undiluted)	Not accepted	All container types 150mL – 3L	Support
Flavoured alcoholic beverages with a wine base	Aseptic packs 150ml – 1L	Aseptic packs 1L – 3L	Support
Water	All container types 150mL-1L	Cask/aseptic packs 1-3L	Recommend including in the Scheme: Plastic containers 3L-10L

³ [SA Container Deposit Scheme - Economic analysis review \(final report\), December 2020 \(epa.sa.gov.au\)](https://www.epa.sa.gov.au/publications-reports/1063-sa-container-deposit-scheme-economic-analysis-review-final-report)

⁴ [European Deposit Systems for One-Way Beverage Containers: Comparison of Key Features \(reloopplatform.org\)](https://reloopplatform.org/)

Plain milk and milk substitutes	Not accepted	Not accepted	Recommend including in the Scheme: Plastic and glass bottles 150ml-3L Liquid paperboard cartons 150ml – 3L Composite packs 150ml-3L
Registered health tonics	Not accepted	Not accepted	Support continued exclusion

Submission on the Consultation Paper: E-waste to Landfill Ban in Western Australia

February 2023

Status of this Submission

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (WALGA).

WALGA is an independent, member-based, not for profit organisation representing and supporting the WA Local Government sector. WALGA's membership includes all 139 Local Governments in the State. MWAC is a standing committee of WALGA, with delegated authority to represent the Association in all matters relating to solid waste management. MWAC's membership includes the major Regional Councils (waste management) as well as a number of Local Government representatives. This makes MWAC a unique forum through which all the major Local Government waste management organisations cooperate.

This Submission represents the consolidated view of Western Australian Local Governments. Individual Local Governments and Regional Councils may have views that differ from the positions taken here.

Local Governments are invited to provide feedback on the Draft Submission by **COB Tuesday, 21 March** to waste@walga.asn.au.

Introduction

WALGA welcomes the opportunity to provide comment on the Department of Water and Environmental Regulation (DWER) [Consultation Paper: E-Waste to landfill ban in Western Australia](#).

The Western Australian Government has committed to deliver a statewide ban on e-waste disposal to landfill by 2024, with the aim of improving management and recycling of e-waste produced by households and businesses across the State.

Approximately 70,000 tonnes of e-waste (electrical, electronic and battery powered items) are currently generated in WA every year, with an estimated 27 per cent of this material being recycled. Material flows analysis, undertaken on behalf of DWER, shows that the amount of e-waste is expected to increase by 250 per cent to approximately 175,000 tonnes (including batteries and photovoltaics) a year by 2043.

Objectives of the ban include supporting increased recovery of value from e-waste materials, protecting the environment by better management of hazardous products, and expanding the State's e-waste collection, recycling and processing networks. The ban will apply to e-waste collected for the purposes of recycling. Incidental disposal, such as items placed in a kerbside bin, will not be subject to the ban.

The e-waste landfill ban will initially focus on:

Electrical, electronic and battery-powered items that have been collected and aggregated purposes of recycling or recovery that:

- a) are covered by effective product stewardship schemes, particularly those accredited schemes under the Recycling and Waste Reduction Act 2020
- b) have established markets or systems for collection, recycling and processing in Western Australia that can grow with increased supply or that have access to national processing infrastructure
- c) contain recoverable base materials of value, for example metals, including precious metals.

A list of the proposed items to be covered by the ban initially, and in a future phase, are included in Appendix 1.

WALGA acknowledges the objectives of the ban and its alignment to global, national and local environmental and recovery targets, in particular the [Waste Avoidance and Resource Recovery Strategy 2030](#). However, **the implementation of an e-waste to landfill ban by 2024, in its proposed form, will have significant financial implications for Local Governments, and the communities they service.**

In 2006, the then Western Australian Waste Management Board commissioned work to investigate the environmental, social and economic impacts of potential landfill bans on household packaging, building products and organic waste. The WALGA Submission made a key recommendation:

Any future investigations into a potential ban to landfill for any material type only be undertaken as a part of a multi-tool approach incorporating Extended Producer Responsibility programmes and other appropriate policies and mechanisms.

WALGA's 2022 [Submission](#) on the Stewardship for Consumer and Other Electrical and Electronic Products **did not support a landfill ban for e-waste in the absence of a fully effective product stewardship scheme for products which would be subject to the ban.**

While it is acknowledged that there are Product Stewardship Schemes in place for some of the products subject to the ban, such as the National TV and Computer Recycling Scheme (NCRS) and Flurocycle, a new National Product Stewardship Scheme, anticipated to cover a wider scope of e-waste, is not scheduled for introduction until mid-2025, with on ground implementation timeframes still to be determined.

WALGA reiterates its position that **comprehensive and effective product stewardship schemes must be implemented for products subject to the e-waste landfill ban prior to the ban taking effect.**

Product Stewardship

The "polluter pays" principle requires that producers should pay the full social cost of the products they produce, including the environmental costs.

Product stewardship schemes are based on this principle, and are an instrument to manage the environmental, health and safety impacts (negative externalities) associated the full lifecycle of products and materials. These schemes require that all parties involved in producing, selling or consuming a product have a responsibility for the full environmental, social and economic costs of the product.

Without Product Stewardship arrangements in place for all items covered under the proposed e-waste ban, the burden of managing the product at end of life falls disproportionately to Local Governments.

Many of the items proposed to be banned from landfill in the first stage of implementation (Under Screens, IT and telecommunications in Appendix 1) are accepted under the National Television and Computer Recycling Scheme (NTCRS). The NTCRS was established in 2011 to provide households and small businesses with free access to e-waste recycling, with collection and processing services offered through co-regulatory arrangements with recyclers.

In 2014, the services provided under these arrangements were reduced to the minimum legislated requirements for collected tonnes and number of access points provided. This resulted in reduced services in regional and remote areas of the state and increased costs to all Local Governments or Regional Councils hosting an e-waste drop off site.

A 2021 survey of 29 Local Governments which offer e-waste collection services to the community showed that each Local Government provides staffing, infrastructure and sites which contribute to the in-kind costs of recycling e-waste. The amount of financial in-kind costs varied from \$1,000 - \$150,000 per year per Local Government, for both in and out-of-scope NTCRS products. WALGA understands that recycling of NTCRS material costs \$350 per tonne and e-waste not included in the NTCRS \$700/tonne.

These costs are also distributed inequitably, as they are only borne by those Local Governments or Regional Councils which operate e-waste drop off facilities; and are required to provide a 'free' service to any member of the community. The Local Governments and Regional Councils which operate these facilities are effectively subsidising the e-waste recycling costs for residents from other Local Governments.

Flurocycle, the voluntary national product stewardship scheme, does not provide any funding for recycling of fluorescent lighting. 22,403 kg of fluorescent lighting materials were collected through the Household Hazardous Waste Program in 2021-22 and cost \$70,568 to recycle, excluding transport. This material comprised 5 per cent of the overall material collected through the HHW Program.

Regional considerations

Due to Western Australia's dispersed population, transport costs have a significant impact on the viability of collection mechanisms in regional and remote areas.

Individual collection sites within the Perth metropolitan area have reported costs of up to \$1,000 per tonne for staffing, sorting, transport and recycling of both in and out-of-scope NTCRS products. This cost will be significantly higher for regional areas due to required transport distances and limited economies of scale. Consumers, Local Governments and retailers operating in regional and remote areas of WA are subject to higher than average costs of living and operation, which places added pressure on meeting any additional costs outside of scheme operations.

WALGA's 2006 submission on the investigation into landfill bans made the following recommendation:

That investigation of any proposed regulatory waste management instrument incorporate a triple bottom line impact analysis applied specifically to the Western Australian context.

While a [cost benefit analysis](#) has been undertaken and provided alongside the discussion paper, feedback from Local Governments has highlighted that the figures used, particularly regarding transport cost, do not reflect the costs experienced in regional Western Australia. For example, the figure used for transport cost of \$100 per tonne has been slightly

increased from the tonne per kilometre rate in a Victorian study and based on an average transport distance of less than 50km. Applying this rate to a remote Western Australian context would result in costs per tonne of approximately \$5,000 for transport of e-waste from the Kimberley to Perth, which is not a realistic or viable cost and disproportionately disadvantages regional and remote Local Governments.

The cost benefit analysis and discussion paper have not clearly delineated the disproportionate costs between metropolitan and regional collection points, by applying a standard cost across the state which primarily reflects a metropolitan perspective. In order to present a more accurate figure, consultation with regional Local Governments is recommended to assess current transport costs and incorporate this into an overall cost per tonne.

The additional cost to regional Local Governments not currently collecting e-waste would include ensuring sites are appropriately licenced to collect e-waste for recycling, potentially installing collection infrastructure, ongoing maintenance and resourcing of the collection site, transport costs to an approved recycler and recycling costs. WALGA has received feedback from a number of Local Governments expressing considerable concern regarding their ability to resource such a requirement.

Conclusion

WALGA acknowledges the provision of grant funding to assist in increasing the capacity of recyclers in WA to accept increasing amounts of e-waste and to assist with collection and reuse.

However, Local Governments would be better supported by ensuring effective product stewardship schemes are in place for all materials which are included in the bans, or alternative funding schemes are put in place to cover additional costs, rather than these costs being borne by Local Governments and the community.

Appendix 1: Scope of products covered by the landfill ban (initial and future)

Table B1: Categories and item examples

	Category	Item examples (sourced from UNU-Keys)
Western Australian e-waste ban initial scope	Screens, IT, and tele - communications	Laptops and tablets
		Cathode Ray Tube Monitors and Televisions
		Flat Display Panel Monitors (LCD, LED)
		Flat Display Panel Televisions (LCD, LED, PDP)
		Professional IT (servers, routers, data storage, copiers)
		Small IT (routers, mice, keyboards, external drives, accessories)
		Desktop PCs and printers (including scanners and faxes)
		Mobile Phones (including smartphones and pagers)
	Lighting and lamps	Telecom (cordless phones, answering machines etc.)
		Compact fluorescent lamps
		Straight tube fluorescent lamps
		Special (mercury, high and low pressure, sodium vapour, other professional lamps)
		LED
	Large household appliances	Lamps (pocket, Christmas)
		Luminaires (including household incandescent fittings)
		Dishwashers
		Kitchen (large furnaces, ovens, cooking equipment)
		Washing Machines (including combined dryers)
	Batteries	Dryers (wash dryers, centrifuges)
Large leisure (including large toys, exercise, large musical instruments)		
Temperature exchange equipment	Dispenser (non-cooled vending, coffee, tickets, etc.)	
	Batteries including those in the Household Hazardous Waste program and the Commonwealth Battery Stewardship Scheme.	
	Lead acid batteries	
	Freezers and Fridges (including combi-fridges)	
	Air Conditioners (household installed and portable)	
Medical devices	Other Cooling (dehumidifiers, heat pump dryers)	
	Professional Cooling (large air conditioners, cooling displays)	
Future phase	Photovoltaics	Dispenser (cooled vending, bottles, candy, etc.)
		Heating and Ventilation (household and professional)
	Small household appliances	Professional medical (hospital, dentist, diagnostics, etc.)
		All items listed under the future Commonwealth Photovoltaic Systems Product Stewardship Scheme (anticipated for 2022/23)
		Microwaves (including combined, excluding grills)
		Other Small Household (small ventilators, irons, clocks, adapters)
		Food (toaster, grills, food processing, frying pans)
		Hot Water (coffee, tea, water cookers)
		Vacuum Cleaners (excluding professional)
		Personal Care (toothbrushes, hair dryers, razors)
		Small Consumer Electronics (headphones, remote controls)
		Portable Audio and Video (MP3, e-readers, car navigation)
		Music Instruments, Radio, HiFi (including audio sets)
		Video (video recorders, DVD, Blu-ray, set-top boxes)
		Speakers
		Cameras (camcorders, photo, and digital still cameras)
		Tools (all household saws, drills, cleaning, garden, etc.)
Toys (small toys, vehicles, small music)		
Monitoring and control equipment	Game Consoles (video games and consoles)	
	Monitoring (professional monitoring and control, garage, diagnostic, etc.)	
	Monitoring (alarm, heat, smoke, security, excluding screens)	
		Household health monitoring (small thermometers, blood pressure meters)