

Western Metropolitan Regional Council



**SUBMISSION ON CONSULTATION PAPER FOR
PROPOSED AMENDMENTS OF WASTE
AVOIDANCE AND RESOURCE
RECOVERY REGULATIONS 2008**



Review of WARR Regulation Amendment Issues

Question 1: Are the definitions for liable entities sufficiently clear and understandable for your organisation to determine if it is required to report? If not, what further clarification would be helpful?

The definitions are sufficiently clear for the WMRC to determine it would be required to report as a regional local government.

Question 2: Are the indicative reporting requirements sufficiently clear for your organisation to determine what type of information it is required to report? If not, what further clarification is required?

Some further clarification is required.

The WMRC operates a Transfer Station, accepting drop-off waste from Council, commercial and domestic customers. The distinction between commercial customers and domestic customers is not always clear. Further clarification on what constitute commercial and domestic sources is required. For detail on how this may affect WMRC's ability to record this accurately, please refer to the example given in answer to Question 3.

It is assumed that the following points do not apply to drop-off services. Should these points apply, further clarification is required on how these apply to drop-off services.

- number and percentage of residential and commercial premises provided with a recycling service;
- participation rate (also called the 'presentation rate');
- if applicable, description of collection container (type, size, colour);
- frequency of collection recycling service;
- total fees charged for the provision of the recycling service to a premises;
- total cost of providing the recycling service; and
- total weight of recovered waste by material type (tonnes).

Should "total cost of providing the ... service" be required, significant clarification should be provided on how this is to be calculated, to ensure consistency across reporting entities. For example, is this to include direct costs only? Should overheads be included?

Where there is potential for overlap between reporting entities, the reporting system should be designed to avoid double-counting of waste, and to not onerously duplicate reporting requirements. For example, where a local government collects waste and delivers it to the drop-off facility of a regional local government, who in



turn delivers it to the landfill of second regional local government, it should be clear which reporting entity is responsible for reporting which data.

It is assumed that where a reporting entity is both a local government organization and a Licensee that both reporting requirements would apply.

It is not clear whether licensed Transfer Station premises would be a Type 3 reporting entity. Should that be the case, further clarification on how this would apply would be required.

Question 3: Are there any barriers to the recording or reporting of these types of data for your organisation? If so, what are they?

Distinction Between Commercial Customers And Domestic Customers

The WMRC operates a Transfer Station, accepting drop-off waste from Council, commercial and domestic customers. The distinction between commercial customers and domestic customers is not always clear. For example, the WMRC imposes a rate for a “Small Trailer” of waste. This rate is used both by residents, and by small business customers.

The WMRC does not have a clear way to distinguish between commercial and domestic customers for all transactions. The most easily available way of distinguishing between customer types is by payment method, but this is not always accurate. Larger commercial customers pay by account, and this proportion is readily available, but would not include small businesses that choose not to pay by account. WMRC estimates for internal purposes that half of the tonnes received under the “Small Trailer” category are small business customers.

Not all Transactions are Weighed

The WMRC estimates weights for several types of waste received from domestic/ small business customers, including:

- | | |
|-------------------------------------|-------------------------------|
| • “Small Trailer – General Waste” | - assumed to weigh 0.3 tonnes |
| • “Small Trailer – Green Waste” | - assumed to weigh 0.3 tonnes |
| • “Small Trailer – Sand and rubble” | - assumed to weigh 0.3 tonnes |
| • “Tip Pass – Member Council” | - assumed to weigh 0.3 tonnes |
| • “Bootload – General Waste” | - assumed to weigh 0.3 tonnes |
| • “Asbestos – Sheet” | - assumed to weigh 0.3 tonnes |
| • “Mattresses & Ensembles” | - assumed to weigh 0.3 tonnes |
| • “Tyres” | - assumed to weigh 0.3 tonnes |

These are broad estimates only and will not give an accurate representation of weight. These generally represent very small amounts of waste relative to the total amounts of waste received through the Transfer Station. Should it be useful,



WMRC could make more accurate estimations of the “average” weight separately for each of these waste types.

The WMRC does not weigh recyclables on receipt at the transfer station. In some instances, as noted above, a weight is assigned. For the majority of recyclables (and problematic wastes) which are received at no charge, no weight is assigned at time of receipt. Recyclables are usually weighed in aggregate before being transported off-site to a processor.

Minor diversion from landfill not weighed

The WMRC receives bulk verge waste from its Member Councils for disposal to landfill. Minor amounts of recyclables and problematic wastes such as e-waste, steel and cardboard are removed from this waste on an ad-hoc basis before this waste is consolidated and transferred to landfill. This diversion is not weighed or recorded. It is estimated to be in the order of 1-2% of bulk waste received.

This is excluded from reporting by WMRC. The diversion reported by WMRC will therefore be slightly underreported.

Question 4: Based on the indicative reporting and data requirements set out above, identify any guidance that is likely to be most useful to your organisation.

General Comments

As many of the reporting and data requirements already exist through DER Licence Annual Compliance Reports for Licensed Facilities, ensuring that data and reporting is required in the same format to the furthest extent possible would streamline reporting for those organisations required to do both.

With regards to *3 Record-keeping Requirements*, further information should be provided on what will be deemed to be “adequate records” and “valid” formats.

Where calculations are to be done, it is suggested that more consistent data would be obtained by the DER requesting the raw data and performing the calculations required themselves in a consistent manner.

Given that reporting entities may need to put in place new methods of record keeping to collect the required data, it is suggested that the requirement to maintain records should not commence until the relevant method has been approved.

Where reporting requires provision of information from third parties, contract conditions may have to be amended to allow for this provision.



Requirements to Weigh

With regards to *4.1 Local Governments*, the requirement to for local governments with access to a weighbridge to weigh all waste collected is considered overly onerous.

The WMRC Transfer Station has a single weighbridge, which is used to weigh in large Council and commercial customers, and to weigh customers out when required. The site is set up in such a way that customers with recyclables or minor amounts of waste (less than 1 tonne), do not pass over the weighbridge. To weigh in every customer at the WMRC Transfer Station would require significant restructuring of the site, and would lead to reduced safety for site customers and staff, as segregation of traffic paths will be removed.

Inoperable Weighbridge

Where the weighbridge is inoperable, the consultation paper proposes that a weight be estimated by assessing material type and volume.

This is considered overly onerous for the WMRC. The WMRC's handling systems do not lend themselves to this sort of measurement: collection trucks tip directly into enclosed silos; the waste is not visible to allow a material type or volume estimation to be made. While the WMRC could direct trucks to tip onto a hardstand area, make a volume estimation and then transfer the waste into silo by machine, this would significantly increase handling requirements, and potentially pose increased safety risks for staff. In addition, visual estimations of volume are highly unreliable.

The WMRC currently has two methods of estimating weight in case of weighbridge inoperability. It is suggested that these be accepted as a method of estimation when the weighbridge is inoperable. The first is as follows:

2. All trucks that are ordinarily weighed to present to the weighbridge and be charged on the basis of:
 - a. 1.2 tonnes per wheel for compacted waste
 - b. 0.2 tonnes per wheel for uncompacted waste
3. In counting wheels, dual wheels are to be counted as a single wheel. For avoidance of doubt, each axle is to be counted as two wheels

The second can be used where WMRC has reliable records of similar loads for a customer: for example, should a Council waste collection truck utilising the site on a Thursday morning be unable to be weighed, the average of the load size for the preceding Thursdays could be used to obtain a reliable estimate of the weight.