

From: [Rebecca Bonsall](#)  
To: [Waste Data Online Administrator](#)  
Cc: [Alex Deane](#)  
Subject: Comments for the Review of r.18D CEO notices for liable persons  
Date: Friday, 31 January 2025 10:39:57 AM  
Attachments: [image144730.png](#)  
[image144730.png](#)  
[image144730.png](#)  
[Information Paper - CEO Notices - City of Bayswater comments.pdf](#)

You don't often get email from [rebecca.bonsall@bayswater.wa.gov.au](mailto:rebecca.bonsall@bayswater.wa.gov.au). [Learn why this is important](#)

To Manager, Waste Data

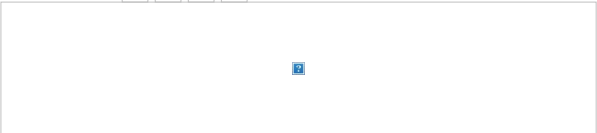
Please see attached comments for the *Review of r.18D CEO notices for liable persons* from the City of Bayswater.

For any additional comments or clarification on the attached, please contact [rebecca.bonsall@bayswater.wa.gov.au](mailto:rebecca.bonsall@bayswater.wa.gov.au) or phone 9270 4195

Kind regards,



**Rebecca Bonsall**  
Coordinator Waste Resource Recovery  
  
61 Broun Avenue, Morley, WA 6062 | PO Box 467, Morley, WA 6943  
  
P: (08) 9270 4195 | F: (08) 9272 0665  
[rebecca.bonsall@bayswater.wa.gov.au](mailto:rebecca.bonsall@bayswater.wa.gov.au)



 The City of Bayswater acknowledges the Traditional Custodians of the land, the Whadjuk people of the Noongar Nation, and pays its respects to Elders past, present and emerging.

This email message and any attached files may contain information that is confidential and subject of legal privilege intended only for use by the individual or entity to whom they are addressed. Any unauthorised use, copying, circulation, forwarding, printing or publication of this message and/or attachments or disclosure of the information contained therein by the recipient is strictly forbidden.  
If you are not the intended recipient or the person responsible for delivering the message to the intended recipient be advised that you have received this message in error and that any use, copying, circulation, forwarding, printing or publication of this message or attached files is strictly forbidden, as is the disclosure of the information contained therein. If you have received this message in error, please notify the sender immediately and delete it from your inbox.



# Waste Avoidance and Resource Recovery Regulations 2008 – Review of r.18D CEO notices for liable persons

Consultation draft information paper

November 2024

This split seems appropriate. Waste is p



Department of Water and Environmental Regulation

8 Davidson Terrace

Joondalup Western Australia 6027

Telephone +61 8 6364 7000

Facsimile +61 8 6364 7001

National Relay Service 13 36 77

[www.dwer.wa.gov.au](http://www.dwer.wa.gov.au)

© Government of Western Australia

November 2024

This work is copyright. You may download, display, print and reproduce this material in unaltered form only (retaining this notice) for your personal, non-commercial use or use within your organisation. Apart from any use as permitted under the *Copyright Act 1968*, all other rights are reserved. Requests and inquiries concerning reproduction and rights should be addressed to the Department of Water and Environmental Regulation.

### **Disclaimer**

This document has been published by the Department of Water and Environmental Regulation. Any representation, statement, opinion or advice expressed or implied in this publication is made in good faith and on the basis that the Department of Water and Environmental Regulation and its employees are not liable for any damage or loss whatsoever which may occur as a result of action taken or not taken, as the case may be in respect of any representation, statement, opinion or advice referred to herein. Professional advice should be obtained before applying the information contained in this document to particular circumstances.

This publication is available at [www.wa.gov.au/dwer](http://www.wa.gov.au/dwer) or for those with special needs it can be made available in alternative formats such as audio, large print, or Braille.

# Contents

<b>1. Introduction.....</b>	<b>4</b>
<b>2. Background.....</b>	<b>4</b>
<b>3. The consultation draft CEO notices.....</b>	<b>5</b>
<b>4. Amendments to CEO notice for liable recyclers.....</b>	<b>5</b>
4.1. New data field – total processing capacity.....	5
4.2. New data fields – total quantity of residual waste and non-residual waste recovered as energy.....	5
4.3. New data field – productive use of final products.....	5
<b>5. Amendments to CEO notice for liable local governments.....</b>	<b>6</b>
5.1. New waste fate – waste recovered as energy.....	6
5.2. New mandatory field – number of single-unit dwellings provided with a service.....	6
5.3. New mandatory field – number of multi-unit dwellings provided with a service.....	6
5.4. New mandatory field – primary destination facility.....	6
5.5. New mandatory field – primary service provider.....	6
5.6. New mandatory field – proportion of waste collected from commercial premises.....	7
5.7. New field – waste from local government activities.....	7
5.8. Remove reporting requirements – recovered materials.....	7
<b>6. CEO notice for non-metropolitan landfills that receive more than 20,000 tonnes of waste.....</b>	<b>7</b>
<b>7. Amendments to the approved procedures.....</b>	<b>7</b>
<b>8. Consultation purpose.....</b>	<b>8</b>
8.1. How to make a submission.....	8
<b>Appendix 1 CEO notice for liable recyclers – feedback template.....</b>	<b>9</b>
<b>Appendix 2 CEO notice for liable local governments – feedback template.....</b>	<b>13</b>
<b>Appendix 3 Approved procedures for liable non-metropolitan landfills – feedback template.....</b>	<b>17</b>
<b>Appendix 4 Proposed changes to the recycler form.....</b>	<b>19</b>
<b>Appendix 5 Proposed changes to the local government form.....</b>	<b>20</b>

## 1. Introduction

‘Liable persons’ are required to report waste and recycling data annually to the Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (the department) in accordance with approved procedures under Part 3A of the Waste Avoidance and Resource Recovery Regulations 2008 (WARR Regulations).

Mandatory waste data reporting under these regulations has allowed for better capture and improved consistency of waste and recycling data in Western Australia. The reported waste data are collated and published annually on the Waste Authority website. It is used by government to track progress against the targets in the *Waste Avoidance and Resource Recovery Strategy 2030* (waste strategy) and to inform policies and strategies related to resource recovery.

Regulation 18D under Part 3A of the WARR Regulations requires the department’s CEO to publish a description of the information required to be reported by liable persons and the procedures to be followed by these persons when making the records and calculating or estimating the information.

In accordance with r.18D, a CEO notice for each liable person type defined in the regulations has been gazetted. Liable persons are liable recyclers, liable non-metropolitan landfills and liable local governments.

## 2. Background

The current CEO notices were developed in consultation with industry stakeholders before they were finalised and gazetted in June 2019. Since publication, the policy and strategic framework under which the data is collected and used has changed.

These changes include:

- the review of the waste strategy
- the introduction of [national standards](#) for waste data reporting
- the introduction of specific reporting requirements for e-waste in the Waste Avoidance and Resource Recovery (e-waste) Regulations 2024
- progress towards a recovered materials framework
- the whole of government initiative, Streamline WA
- the commencement of WA’s first waste-to-energy facility.

Additionally, the department has received feedback from liable persons that some of the approved procedures in the CEO notice are not fit for purpose and some of the data required to be reported is difficult to obtain.

This split seems appropriate. Waste is p  
collection day, so further splitting of data

### 3. The consultation draft CEO notices

The information required to be reported under r.18D of the WARR Regulations and the procedures to be followed in reporting that information have been revised in the draft CEO notices with the following objectives:

- improve compliance with reporting requirements by simplifying the CEO notices and approved procedures
- remove unnecessary reporting requirements
- align with national standards to enhance data sharing and benchmarking across jurisdictions
- ensure waste-to-energy data is efficiently and effectively collected
- improve measurement of progress towards targets in the Waste Strategy
- update approved material types and associated densities.

The department is seeking feedback on the proposed amendments to the CEO notices and approved procedures, including density factors and approved material types. The proposed amendments are outlined below. Analysis of reporting changes are provided in the Appendices

### 4. Amendments to CEO notice for liable recyclers

#### 4.1. New data field – total processing capacity

It is proposed that total processing capacity in tonnes or cubic metres is required to be reported as a mandatory data field. This would be defined as the maximum quantity of material that can be processed at a premises per year without substantial upgrade or amended approvals. Total processing capacity would be required to be reported against the waste categories processed at a premises.

This data field would be considered commercial in confidence and would be used to inform policy and program development.

The inclusion of this data field brings WA in alignment with the *Australian standard for waste and resource recovery data and reporting*.

#### 4.2. New data fields – total quantity of residual waste and non-residual waste recovered as energy

With the commencement of large-scale waste to energy, a new data field is proposed to capture the quantity of residual and non-residual waste recovered as energy. This data field is required to measure the progress against the recover target in the waste strategy: Recover energy only from residual waste.

The calculation of residual waste will be consistent with the definition of residual waste in the waste strategy.

#### 4.3. New data field – productive use of final products

It is proposed that the productive use of final products recovered from waste is captured. For each approved waste material category, liable recyclers would be required to report the quantity of final productive use under the following classifications:

- reuse
- uncontaminated fill
- civil construction
- soil improvement, land rehabilitation and mulch
- manufacture of new products similar to those from which the recovered material was derived
- manufacture of other products.

The inclusion of this data field brings WA in alignment with the *Australian standard for waste and resource recovery data and reporting*.

## **5. Amendments to CEO notice for liable local governments**

### **5.1. New waste fate – waste recovered as energy**

Currently, local governments report the fate of waste as ‘disposed’ or ‘recovered’. It is proposed to introduce a new fate ‘waste recovered as energy’ to fully capture the fate of waste collected by local governments. With large-scale waste to energy in the Perth metropolitan region, this will be an increasingly common fate of waste collected by local governments.

### **5.2. New mandatory field – number of single-unit dwellings provided with a service**

This will replace the current mandatory field ‘percentage of households provided with a service’. It will improve data quality by removing reliance on third-party dwelling data that is only periodically updated and recognises that some services may only be provided comprehensively to this style of housing.

### **5.3. New mandatory field – number of multi-unit dwellings provided with a service**

Some waste and recycling services may not be provided by a local government to some multi-unit dwellings. The capture of this data recognises that apartment style housing is becoming increasingly common in some local governments.

### **5.4. New mandatory field – primary destination facility**

The primary destination facility is the facility where most of the waste collected from a kerbside or vergeside waste service is ultimately processed or disposed of. This field is already reported voluntarily by most local governments through Waste Data Online. It is proposed to make this field mandatory to enable simplification of other reporting requirements (see 5.7).

### **5.5. New mandatory field – primary service provider**

The primary service provider is the provider (in-house or contractor) collecting most of the waste from a kerbside or vergeside waste service. This field is already reported voluntarily by most local governments through Waste Data Online. It is

proposed to make this field mandatory to ensure that the department maintains a comprehensive understanding of how waste services are delivered in WA.

### **5.6. New mandatory field – proportion of waste collected from commercial premises**

It is proposed that this field is introduced to simplify reporting requirements about waste services provided to commercial premises.

The introduction of this field will allow the removal of the requirement for local governments to separately report waste services provided to commercial premises. Instead, where a service is provided to both residential and commercial premises, such as a kerbside mixed waste service, local governments will report the total weight collected from all sources and the proportion of waste collected from commercial premises.

### **5.7. New field – waste from local government activities**

It is proposed that this field is introduced to provide a more complete understanding of waste collected by local governments, it will be inclusive of current public place and special event collection reporting requirements.

The inclusion of this data field brings WA in alignment with the *Australian standard for waste and resource recovery data and reporting*.

### **5.8. Remove reporting requirements – recovered materials**

It is proposed to remove the requirement to report the weight of waste recovered by material category for each waste service. The department will estimate this data as required based on information directly reported by resource recovery facilities.

## **6. CEO notice for non-metropolitan landfills that receive more than 20,000 tonnes of waste**

There are no substantive proposed amendments to this CEO notice beyond the approved procedures as outlined under Section 7.

## **7. Amendments to the approved procedures**

It is proposed to update the approved procedures for each CEO notice issued under regulation 18D of the WARR Regulations to:

- provide guidance for new fields
- simplify existing procedures to enhance opportunities for reporters to comply with the requirements of the CEO notice
- ensure that approved material types and density factors remain consistent with the materials recycled and disposed in WA.



## 8. Consultation purpose

The department is seeking feedback on the drafts of the CEO notices. The department will analyse submissions and make recommendations to the CEO on the final CEO notices.

You can provide feedback by completing the template at Appendix 1 and submitting it to the department.

By making a written submission, you are consenting to the submission being treated as a public document. Your name may be published; however, your contact address will be withheld for privacy. If you do not consent to your submission being treated as a public document, you should either mark it as confidential, or specifically identify the parts that you consider confidential, and include an explanation.

The department may request that a non-confidential summary of the material is also given. It is important to note that, even if your submission is treated as confidential by the department, it may still be disclosed in accordance with the requirements of the *Freedom of Information Act 1992*, or any other applicable written law.

### 8.1. How to make a submission

Written submissions must be received by 5pm (WST) on 31 January 2025. No late submissions will be considered. Written submissions can be lodged by email (preferred) to [waste.data@dwer.wa.gov.au](mailto:waste.data@dwer.wa.gov.au) or hard copies can be mailed to:

Manager, Waste Data  
Department of Water and Environmental Regulation  
Locked Bag 10 Joondalup DC  
JOONDALUP WA 6919

For more information, email [waste.data@dwer.wa.gov.au](mailto:waste.data@dwer.wa.gov.au).

## Appendix 2 CEO notice for liable local governments – feedback template

Amendments	Feedback questions	Comment
<b>5.1 New waste fate – waste recovered as energy</b>	Are there any barriers to you reporting waste recovered as energy? If so, what are these barriers?	The City of Bayswater is currently not contracted to Energy from Waste and therefore is not relevant at this time.
<b>5.2 New mandatory field – number of single unit dwellings provided with a service</b>	Are there any barriers to reporting the number of single-unit dwellings provided with a particular waste service? If so, what are these barriers?	No barriers.
<b>5.3 New mandatory field – number of multi-unit dwellings provided with a service</b>	Are there any barriers to reporting the number of multi-unit dwellings provided with a particular waste service? If so, what are these barriers?	No barriers.
<b>5.4 New mandatory field – primary destination facility</b>	Are there any barriers to reporting waste received as residual or non-residual waste? If so, what are these barriers?	Waste received is reported by the City's contractor's, Cleanaway and EMRC and therefore no barrier.
	Other comments	
<b>5.5 New data field – primary service provider</b>	Are there any barriers to reporting your primary waste service providers? If so, what are these barriers?	The City's kerbside and vergeside collections are undertaken by Cleanaway.
	Other comments	

<b>5.6 New data field – proportion of waste collected from commercial premises</b>	Are there any barriers to your local government estimating the quantity of waste collected from commercial premises for each waste service provided?	Cleanaway reports commercial properties based on percentage of properties that are commercial vs residential. The City is unable to report on commercial-specific tonnages collected kerbside through its current invoicing arrangements with Cleanaway. From 30 June 2028, the City will no longer provide waste services to commercial businesses.
<b>5.7 New field – waste from local government activities</b>	Are there any barriers to reporting waste collected from these local government activities:  Street sweepings  Illegal dumping clean-ups  Park and recreation facility management	Street sweepings - the City takes waste to Capital Recycling and pays by the cubic metre, not by weight. The City could report by cubic metre, or estimate an approximate weight 1 cubic metre for reporting.  Park management - a portion of the City's green waste is removed by a contractor, on a 'by job' arrangement (no line item for waste collected). The City also processes a portion of green waste into mulch in-house - this is not measured but could be estimated by volume of mulch produced.  Illegal dumping - currently the City's illegal dumping is not separated from other waste collected around the City due to one vehicle in operation. In the future, the City could look at ways to separate illegal dumping to simplify reporting.  Depot waste - currently not recorded but could be factored into next contract if required.
	Other comment	
<b>5.8 Remove reporting requirements – recovered materials</b>	Do you have any concerns about removing this reporting requirement for local governments?	No concerns.
<b>7 Approved procedures</b>		
<b>Section 4.6 Estimating costs</b>	Is this sufficient guidance to allow you to report the total cost of providing waste and recycling services? If not, what other guidance is required?	Yes, information in section 4.6 is sufficient.
<b>Section 5 MUDs</b>	For multi-unit dwellings, with commercial units, local	This split seems appropriate. Waste is presented kerbside on the same collection day, so further splitting of data is not possible.

	<p>governments can assume 75 per cent of the waste is collected from domestic sources and 25 per cent is collected from commercial sources.</p> <p>Does this 75/25 split seem appropriate?</p> <p>Can you suggest a more representative split of waste sources for MUDs?</p>	
<b>Section 10</b> <b><i>Default vehicle volumes</i></b> <b><i>Table 1</i></b>	Please list any other vehicle types that should be included, with representative volumes.	No comment.
	Are the assumed vehicle volumes accurate? If not, please provide alternative volumes.	No comment.
<b><i>Default bulk densities</i></b> <b><i>Table 2</i></b>	Are the listed bulk densities representative? If not, please provide the average bulk densities of materials received at your waste facility.	No comment.
	Do you have bulk densities that we could use for other material types that are not listed?	No comment.
<b><i>Default weight of bin contents</i></b>	Are the weights representative of waste collected in your local government? If not, please provide alternative weights.	No - these weights do not represent a 3-bin FOGO system. The City's most recent compositional audits estimate that general waste bins are 11.3kg (fortnightly 240L), recycling bins are 7.9kg (fortnightly 240L) and FOGO bins are 14.0kg (weekly 240L).

<b><i>Weight per item of product wastes</i></b>	Do you have data that suggests alternative average weights for the listed products?	No comment.
	Do you have weights that we could use for other waste items not listed?	No comment.
<b>Other comments</b>		

	Do you have weights that we could use for other waste items not listed?	
<b>Approved procedures</b> <b>Other comments</b>		