



Mr Alistair Jones
Director General
Department of Water and Environmental Regulation
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By email: wastestrategyreview@dwer.wa.gov.au

16 December 2025

Dear Mr Jones

Re: Beyond Waste 2030: WA waste strategy review

Thank you for the opportunity to provide feedback to the Department of Water and Environmental Regulation (DWER) on *Beyond WAsTe 2030 - Western Australia's Waste Avoidance and Resource Recovery Strategy* (the "Draft Strategy") and the *Beyond WAsTe 2030 Roadmap* ("Roadmap"). The Draft Strategy sets the intention for the state to be "*a sustainable, low-waste future powered by a circular economy, where our communities, economy and environment thrive*". It identifies five (5) equal priorities - intensify focus on waste avoidance and reuse, realise the economic potential of recycling and circular economy, foster a resilient recycling organics sector, support the circular management of clean energy technologies and electronics, and improve outcomes for regional and Aboriginal communities - whilst maintaining the goals of the previous *WARR Strategy 2030 (2019)* to:

- Avoid – with a specific target to reduce total waste generate per person by 10% assumed to align with the *National Waste Policy Action Plan* and the 2018-19 baseline);
- Recover – with specific targets to recover energy only from residual waste, increase recycling rate to 75% (MSW:70% in Perth and Peel, 60% aim regional centres; C&D increase to 80%; C&I increase to 80%), and for all local governments in Perth and Peel regions implement better practice FOGO systems; and,
- Protect – with no more than 15% of waste generated in Perth and Peel sent to landfill, work toward eliminating illegal dumping, all waste to be managed or disposed of using better practice approaches and facilities, and a 20% reduction in litter (on 2024 baseline).

Cutting across all three (3) goals is the target to reduce disposal of organic waste to landfill by 50% (from 2019-2020 levels). The Draft Strategy has been developed over the past two years, following the release of a *Directions Paper* in 2023 and *draft Waste Strategy* in 2024, with this third phase of the consultation process marking the final step to gather feedback.

The Waste Management and Resource Recovery Association of Australia (WMRR) represents more 2,300 members from approximately 400 entities spanning the breadth and depth of the waste and resource recovery (WARR) industry, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs) and research bodies. Our members are involved in a range of important WARR activities across the entire Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable secondary raw products from resource recovery, energy

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recovery as well as community engagement and education. In WA, WMRR represents over 180 individual members from more than 35 entities. The state generates 7.4 million tonnes of waste each year with 65% material recovery (66% with energy recovery), delivering an economic value of \$724 million employing 5,070 Western Australians.

Being at the forefront of the ongoing evolution towards whole-of-system action and the development of a circular economy, WMRR strongly advocates for a systems-based approach to managing materials in Australia in order to use less for longer, and mitigate carbon impacts. This includes fierce advocacy for the waste and resource management hierarchy - which promotes the avoidance of waste, and the diversion of materials from landfill through design for reuse, recovery, recycling and composting of resources, as well as the transition from linear thinking around 'waste' and 'recycling' towards a circular economy wherein products derived from resource recovered materials are able to compete in local and global markets with virgin products.

To achieve this, policies and regulation must drive sustainable production and consumption, producer responsibility, stewardship for emerging waste streams, and investment conditions that reflect the true cost of full lifecycle management—including a landfill levy that supports, rather than undermines, capital investment in recovery infrastructure and the local green jobs that accompany this investment. Opportunities to create national alignment should be preferenced to benefit the economies of scale for national supply chains and markets, given the shift towards one national circular economy - this is particularly important in WA given the size of the local market for both production and consumption.

Without this systems approach, any aspirational targets to minimise waste will remain weak, inconsistent, and unlikely to deliver the systemic change needed to maximise resource value and keep materials circulating at their highest utility. Australian jurisdictions have the opportunity to draw from strong regulatory and economic models globally, such as Scotland's regulated circular economy system underpinned by the *Circular Economy (Scotland) Act* and *2030 Route Map*, and the EU's *Waste Framework Directive* which demonstrate that circularity requires regulation at its core, not voluntary measures.

General Comments

The Draft Strategy document itself is conceptually strong providing a solid overarching framework and whole-of-government positioning, recognising the need for the state to create a robust investment framework noting Treasury's strategic influence and the relevance of broader state strategies such as [Made in WA](#), [Diversify WA](#), the [State Infrastructure Strategy](#), the [State Waste Infrastructure Plan](#), and [WA's 10-Year Science and Technology Plan](#). Additional priorities introduced since 2024, including contingency planning and disaster management, are supported by WMRR.

However, given the continued WA whole of government goals of 'avoid', 'recover' and 'protect', WMRR expected the Draft Strategy to include actions and genuine commitment to influence product design standards to design out waste, precinct planning, enforceable procurement thresholds for recovered content, and mitigating contamination. These are essential to achieving waste avoidance and circularity across WA supply chains wherein materials and products are reusable, repairable, recyclable and recoverable.

Unfortunately, at present, the Draft Strategy conflates "avoiding waste" with downstream recycling activity. Circularity begins at the design stage and requires embedding systems thinking and action to enable genuine

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design for recovery (for example, the approach Apple takes towards keeping products in circulation through commitment to repair and spare parts) rather than relying on disadvantaged repair networks or accepting perpetual downcycling. Successful design for optimal extension of life, reduction of waste and resource recovery and reinvestment, is intrinsically linked to the economic success of supply chains for these reinvested materials, and requires regulated sustainable and safe design standards, recycled-content mandates and enforceable procurement commitments to create market pull—none of which appear in the actions. Other jurisdictions, such as NSW and Victoria, provide clear precedents for targets, chemical bans and circular procurement policies, and WMRR would advocate that WA should take a similar approach to ensure that WA does not fall behind, and risk becoming the dumping ground for poorly designed products.

WMRR makes the following recommendations:

1. Revise the strategy to distinguish between ‘recycling’ and ‘resource recovery’

WMRR notes that when referring to data, the term ‘recycling’ is used to also include “materials recovery” (apparently to ‘align’ with other jurisdictions) and a simplified waste management hierarchy is presented which omits critical distinctions such as treatment and recovery pathways. This makes no sense given that along with “avoid”, and “protect”, a key goal for the strategy is “recover” and national waste definitions already distinguish between recycling, resource recovery, treatment and disposal. The Draft Strategy’s refreshed hierarchy and use of ‘recycling’ to also include ‘recovery’ blurs the distinct concepts of recycle, recover, and treat, creating confusion around activities such as composting and the technology aided recovery of metals / plastics and their place in the hierarchy. This is especially important when considering energy recovery from waste alongside food and organics processing, noting that the current wording in the strategy explains that “*energy recovery supports the Beyond WASTE 2030 ‘protect’ target by converting non-recyclable waste into usable energy, reducing reliance on landfill and recovering value*”.

Keeping materials circulating at their highest value is fundamental to the principles of a circular economy and the Draft Strategy’s priority to realise the economic potential of recycling and the circular economy (Priority 2). Moreover, the [National Waste Policy Action Plan](#) sets an explicit ‘resource recovery’ target of 80% by 2030. WMRR also notes that in separate correspondence, it has been communicated that the “Recovered Materials Framework” will be re-badged to be known as the “Resource Recovery Framework” to better align with other Australian jurisdictions. It follows that the terminology used in the revised strategy should also align and embrace ‘resource recovery’ terminology and accord with national thinking to move beyond just ‘waste’ and ‘recycling’ to better address waste avoidance and better design among other opportunities across product lifecycles.

2. Revise the Roadmap to include measurable, targeted, timebound actions as foundational actions

In WMRR’s view, the Draft Strategy and Roadmap do not show how the five (5) priorities will be measurably actioned and addressed to create the robust investment framework needed for WA to realise its sustainable, low waste future. The actions lack sufficient clarity, data, ambition, specificity and regulatory drivers. Many actions require delivery dates to stimulate investment. Timely legislative reform in particular, is needed such as the waste levy review (including a review of the levy zones), FOGO mandates (household and commercial), delivery of the Recycled Material Framework (or Resource Recovery Framework) and sustainable design standards that include avoidance of-waste regulations. The Draft Strategy would also benefit from clearer alignment with national frameworks, including the *National Policy Action Plan* and *Australia’s Circular Economy*



Framework which emphasise product design, commercial and industrial (C&I) waste, and upstream system change—areas currently underrepresented in the Strategy’s actions.

In particular WMRR notes that:

- Whilst there was a review undertaken of the levy in 2019, there was no resultant action. The waste levy urgently requires fundamental re-evaluation as a matter of timebound priority, particularly if the State intends to support investment in recovery infrastructure, market development, green jobs and growth. The foundational actions relating to the levy (F.1.1, F.2.2 and F.2.3) are currently weak, and require stronger commitments and deadlines, including a review of the levy zones to address current levy avoidance. A transparent business case must be developed within a specified timeframe. WMRR notes that funding feasibility of infrastructure and investment in WA remains questionable without an appropriate levy.
- The foundational actions generally – which along with levy also include crucial legislative review and reform (F.1.3), the development of an illegal dumping strategy (F.1.6) and C&I audits (F.2.1) – should have specific delivery dates rather than being marked as “ongoing” or “medium term”. Further, some foundational actions to use AI for illegal dumping (F.1.7) is too narrow and should extend beyond tyres (noting the benefits AI can bring to contamination management across all waste streams). The administration of grants and programs (F.1.9) and the development of better practice guidelines for waste facilities and services (F.1.8) are lacking specific deliverables and have ongoing timeframes.
- Despite extensive consultation since 2020 identifying the need for mandatory frameworks, no new legislation or regulatory reforms are proposed (beyond the expansion of the container refund scheme). Regulation—including design standards, recycled-content requirements, FOGO mandates, and C&I separation obligations—is largely absent despite having been consistently identified as essential by industry in previous consultations, and other Australian jurisdictions implementing such reforms. These will be instrumental in achieving the 80% resource recovery target by 2030.
- Design levers must be activated to eliminate harmful chemicals, improve product durability, and ensure reuse and repair are present and viable; yet these mechanisms are not yet meaningfully integrated into the actions. This approach would be in keeping with the latest national guidance from DCCEEW’s national waste and resource recovery report embracing the [Expanded Waste Hierarchy](#) which preferences the most desirable action as “design to last”.
- Tangible, measurable procurement requirements for recycled content and circularity are needed to drive demand but are currently missing. The cross-government approach creates opportunities for WA to adopt best practice from other jurisdictions such as Victoria’s *Recycled First Policy*.
- Mandatory stewardship must replace voluntary schemes, supported by appropriate fees, infrastructure and markets. The WA e-waste ban, for example, is not stewardship and should not be presented as such, and WA must move much faster to address the fire crisis industry is facing with batteries, yet despite agreement by the Environment Ministers to act on national mandatory legislation in late 2024 there has been little to no progress in WA since.

For ease of reference to aid the review, WMRR has focused its commentary on the actions identified in the Roadmap and has provided specific feedback against each of the five (5) priorities.

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Priority 1: Intensify our Focus on Avoidance and Reuse

The aim of this priority is to avoid waste generation through reuse and repair and maintaining the value of products and materials for as long as possible – a concept strongly aligned to a circular economy. According to the latest Waste Authority data, in 2023–24, Western Australia generated 7.4 million tonnes of waste, a six per cent (6%) increase from the previous year. WA’s waste generation per capita has increased to 2.586 tonnes per person, indicating that existing avoidance measures are not working. Waste generation was dominated by the construction and demolition sector (51%), followed by commercial and industrial (29%) and municipal solid waste (19%), with 81 per cent of all waste arising in the Perth and Peel regions. If avoidance is to remain a priority — recognising that it has been for many years without significant progress — specific, measurable and timebound metrics must be developed and embedded.

Given the goals for 2030 (including the national 80% resource recovery target) and the available data, it would be expected that this priority would have specifically focused, action based, time bound, measured goals. Critically, no current actions address design and import standards to prevent non-recyclable and problematic materials entering WA in the first place. Several meaningful actions which could drive increased uptake of recovered materials and minimise waste, including 1.2.4 which is to “*pursue options to improve waste management across State Government agencies*” lack clear timeframes.

The priority’s actions do not reference the significant financial and regulatory levers that the government can utilise to help shift the dial in terms of avoiding waste being created in the first instance:

- Most notably, there is not any mention of increasing the waste levy. Having a clear action to review the levy rate and levy zones across the state should be an immediate priority given the data showing the increase in per capita generation. It will not be possible to drive investment in WA when the price to landfill is far cheaper than the costs of investment in resource recovery. There are significantly different capital, energy and labour costs associated with resource recovery that do not exist for landfill that must be addressed in order for WA to drive investment in this area. This will be fundamental to also realising the objectives of Made in WA.
- There is a complete omission of any action to implement and/or influence product design and import standards/ policy/ legislation to avoid non-recyclable materials being referenced and difficult materials entering WA’s waste streams in the first place. WA can look for inspiration from the work that is being done currently in NSW to address design as part of the 2025 *NSW Plastics Plan*.
- There is no reference to introducing mandated stewardship schemes to regulate materials within supply chains and align with efforts led by NSW (and being closely followed by Victoria and SA) in adopting the *Product Lifecycle Responsibility Act 2025* as agreed at the December 2024 Environment Ministers Meeting . It would be prudent for WA to include in its Roadmap a clear pathway towards introducing similar legislation within the short term under which mirror regulations for the management of material streams (with batteries being a priority) can be introduced.

The existing actions under Priority 1 are generally “ongoing” (including the levy review) with a small number of short-term goals which refer to vague concepts, for example, DWER to “*Support Plastic Free July*” (1.3.1) or for Transport to ‘*establish a systems wide understanding of product and material circularity in transport infrastructure*’ (1.1.2). The Roadmap currently overlooks core sectors such as manufacturing, retail, construction and food services and fails to quantify the impact that such actions may have whilst clearly using valuable but limited DWER resources. Further, whilst “supporting” and “investigating” worthwhile initiatives such as DWER’s



ongoing action to ‘investigate applying national circular economy metrics and targets in WA and support a methodology to measure circularity in WA’, the Roadmap does not make firm commitments to deliver a completed action (for example, to implement circularity metrics reporting by 2028).

In WMRR’s view, data, clear metrics and evidence-based interventions should be used to support actions for this priority that meaningfully design out waste rather than aiming to increase the usefulness and repairability for materials never designed for circularity in the first place. WMRR would like to see the actions under this priority reviewed with timebound actions to:

- implement a clear review of the levy, including zones and infrastructure over the term of the strategy,
- hold government accountable for minimum recycled content thresholds in their procurement,
- introduction of framework legislation for mandatory stewardship, and,
- generate WA circularity metrics to capture what is placed on market and how and if it is recovered.

Priority 2: Realise the Economic Potential of Recycling and the Circular Economy

The aim for this priority is to ‘transform waste’ into a valuable resource to create an efficient and profitable circular economy. While the narrative framing in this section is sound – talking to the role of Recovered Materials Framework and the government procurement in a circular economy, and the need for investment in local infrastructure to optimise waste as a resource – the actions lack specificity, ambition and regulatory substance. WMRR reiterates that a clear mechanism is required to ensure design, safety and market value are addressed across all material types. Extended producer responsibility and stewardship should be central to this priority area, particularly for high-impact materials and products.

The action to review the *State Waste Infrastructure Plan* (2.4.3) is welcomed but should be elevated to a short-term priority with a concrete delivery date, and ideally following a comprehensive review of the levy given how key it is to infrastructure investment, given the crucial need for investment in WARR infrastructure to facilitate the circular transition, and therefore should not be a long term goal. Further economic opportunities also exist in revisiting the *State Waste Infrastructure Plan*, including the potential for large-scale, centralised resource recovery and recycling precincts associated with Westport and the Kwinana Industrial Area. To better support precinct planning, action 2.4.4, which proposes investigating waste precincts and industrial symbiosis, should be guided by an updated *State Waste Infrastructure Plan* that provides clear planning, policy and investment direction.

Priority 3: Foster a Resilient Recycled Organics Sector

WMRR supports this priority but notes that the Draft Strategy largely focuses on local government and their rollout of FOGO services in Perth and Peel, which alone will not drive the necessary recovery rates nor carbon mitigation. The Roadmap identifies ‘action’ on emerging contaminants by participating in inter-governmental groups, providing input, supporting national initiatives and looking to investigate safe pathways for compostable food packaging. To improve the quality of FOGO derived composts and support end markets and provide industry certainty, the actions should consider the broader organics sector and go further to take positive steps to keep organic input streams clean – which involves the removal of packaging all together. A resilient, circular organics sector requires inclusion of all streams (including C&I), consistent inputs and outputs, product standards (both physical and chemical), auditing frameworks and transparent sharing of audit results, and efforts directed to minimizing contaminaton entering recycled organics supply chains.

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WMRR notes:

- The absence of C&I organics actions is a significant gap, given that meaningful diversion cannot be achieved through MSW alone - mandated C&I separation should be considered, accompanied by investment in facilities, consistent standards for input and output that are science backed, and high-quality data capture.
- The references to improved messaging and contamination reduction are welcome, but actions must go further. Standardised, statewide FOGO accepted materials lists should be an output of action 3.1.1, forming the basis for procurement, education, and processing contracts, whilst also meeting license requirements for contaminants such as PFAS. This means clear and consistent messaging to householders and business about what is acceptable in organics bins, being food and garden organic only. To best align with other jurisdictions, this should stipulate no packaging at all beyond a compostable bin liner given the ongoing presence of PFAS and micro plastics.
- The continued consideration of certified compostable packaging (3.1.5) contradicts national direction and risks undermining system clarity and market confidence. Compostable packaging is not easily distinguishable from other packaging (including PFAS and micro-plastic containing plastics) and threatens the integrity of feedstocks, processing infrastructure and recycled organics end products. FOGO acceptance criteria should align with minimising the risks of physical, chemical and biological contamination to build sufficient market and processing capacity in WA. The industry also needs certainty around the applicable regulatory regime including applicable product standards, testing and sampling.

Priority 4: Support the Circular Management of Clean Energy Technologies and Electronics

WMRR reiterates that creating market certainty relies on recycled-content procurement and design regulation, not simply finding end-of-life pathways. WMRR is pleased to see the safe collection of e-waste and batteries as an action in this section, however, would like to see this progressed with urgency (noting that 4.2.3 to develop product stewardship arrangements for batteries is a 'medium term' goal).

In WMRR's view, stewardship and extended producer responsibility actions should be broadened across this section, in particular noting that:

- the National TV and Computer Recycling Scheme is outdated and no longer suited to modern electronic waste volumes or chemistry. A state-level review of the scheme's effectiveness is urgently needed. The continuation of the e-waste ban to landfill (4.3) does not on its own, do enough to align with the outcome of 'supporting the recovery of value' and mitigate the risks from e-waste', and arguably just increases appetite for illegal dumping where there is lack of access to an appropriate stewardship scheme.
- The Strategy should set a clear direction to review the *State Waste Infrastructure Plan* with a lens on emerging technology waste, regional logistics, and the potential for circular economy hubs. This would align infrastructure planning with the rapid growth of clean energy and electronics waste. WMRR reiterates that increasing levy and forecasting waste levy increases ideally for the term of the strategy will encourage circular infrastructure investment and planning certainty. This is particularly important for large capital infrastructure projects such as end of life solar and wind turbine facilities, which also incur significant operational costs.

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Priority 5: Improved Outcomes for Regional and Aboriginal Communities

The Draft Strategy acknowledges the geographic and logistical challenges facing regional and Aboriginal communities. However, WMRR does have some concerns that this priority risks consuming a disproportionate share of the waste levy despite the existence of other government funding programs such as the Remote Communities Fund which have been identified to address these challenges.

WMRR supports actions from improved data collection on existing waste infrastructure in Aboriginal communities identified under the *Closing the Gap* target (5.1.3), but similar actions must also address known gaps in regional and remote infrastructure — which are not reflected in the Draft Strategy or Roadmap. The absence of updated or region-specific infrastructure planning is a major gap. As mentioned throughout this submission, the current *State Waste Infrastructure Plan* is not fit-for-purpose and must be reviewed within the life of the Strategy. Regional hubs, transport consolidation points, and precinct methodologies should be evaluated alongside broader state infrastructure planning to ensure investment certainty. Updating the plan would help ensure that investment efforts in remanufacturing/ recycling capacity are underscored by access to markets to ensure economic viability of new and existing facilities.

WMRR notes the brief 28-day consultation period for this review, as well as the intention to finalise the strategy immediately afterwards, and urges DWER to give full consideration to the feedback received before finalising the Strategy. The extremely short consultation period is noted with concern, as it risks creating the perception of a superficial process that limits meaningful stakeholder engagement. WMRR hopes that our feedback will be carefully considered in the revision of the Draft Strategy to ensure it delivers greater focus, clarity, and firm government commitments capable of driving meaningful, system-wide transformation for beyond 2030.

Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

Gayle Sloan

Chief Executive Officer

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