

To: Mr Doug Forster
Director of City Infrastructure and Enterprises
City of Perth
GPO Box C120
Perth WA 6839

19th September 2014

Dear Mr Forster

CITY OF PERTH WASTE STRATEGY 2014-2024+

The Property Council of Australia would like to congratulate the City of Perth in developing a ten-year waste strategy.

As the leading advocate for Australia's property industry, the Property Council represents key owners, investors and developers in the City of Perth who will be impacted by the new Waste Strategy 2014-2024+ (the Strategy).

The City of Perth is in a position to drive significant change to the management of waste, improving recycling and the overall environmental footprint of the city. Having a clear waste strategy will help to ensure that Perth in the future does not suffer as other cities have from issues such as waste being stored on the streets/laneways and accessibility constraints for collection vehicles to service bins due to a lack of foresight, planning and coordination.

The Property Council would, however, like to express some concerns regarding the strategy and outline areas that need further clarification.

Strategy Objectives and KPIs

The Property Council notes that the Strategy's objectives do not address waste minimisation or recycling. This would appear to be a fundamental oversight for any strategy addressing waste.

Further, the Strategy does not set out any overall waste minimisation or recycling targets, or any key performance indicators. Without these, it is not apparent how the City of Perth will be able to assess the success of the implementation of the Strategy in 2024.

The Property Council recommends that targets are established for the City of Perth's own operations at a minimum and for the Municipal Solid Waste sector.

Action 2 – Develop and adopt a policy and guidelines related to waste storage and service access requirements for development applications

The Property Council supports the creation of such documents as mentioned in this action that would provide crucial assistance in the early design phase of buildings.

It is recommended that the guidelines adopted by the City of Perth include standard waste generation rates for a range of building types, such as multi-residential, commercial office, hotels and retail. It is recommended that these generation rates be in line with national best practice.

The Property Council believes that as greater development occurs throughout the City ensuring that vehicles can safely access buildings and that waste can be stored safely and effectively is critical.

Action 3 – Review Environmental Health Licence requirements to include submission of a waste management plan

Further clarification is needed in regards to this action as to whether it applies to existing buildings or only new businesses applying for an Environmental Health Licence.

The Property Council also recommends that standardised and specific requirements are established for the waste management plans. Otherwise that requirement runs the risk of simply becoming meaningless red tape.

Action 4 – Develop a business plan for the commercial waste and recycling service

The Property Council would welcome the greater availability of recycling services for commercial buildings. There is a clear and pressing need for commingled recycling and a better system to be introduced for the collection of cardboard.

Action 6 – Adopt a policy to require the submission of a waste management plan for development applications

To maximise the benefit of the submission of a waste management plan by developers (for the construction phase), the Property Council recommends that the City of Perth establish:

- the specific requirements for the waste management plans;
- whether these plans are enforceable by the City of Perth; and
- whether recycling rate targets will be required, similar to those of the Green Building Council of Australia.

The Property Council recommends that the submission of a waste management plan should occur at the building licence stage, rather than at development application. At the building licence stage, more detail will be known about the development, such as building material types. This means the City of Perth could require the submission of more detailed waste management plans than could have been submitted at the development application stage, enabling the submission of the plan to be more than just a box-ticking exercise.

The Property Council also recommends that the City of Perth provide bonus plot ratio allowances for developments that provide a commitment to use building products that contain a certain level of recycled content.

Action 10 – Review public place bin placement and implement the recommendations

The Property Council recommends that the review of public bin placement include the formation of guidelines for the implementation of public place recycling infrastructure within areas such as food courts and open spaces, in order to ensure there is a consistent and coordinated approach for the collection of recyclables in all CBD public spaces.

The Property Council also recommends that the review examine the types of bins being placed, the use of clear, informative signage and the strategy for placing clearly distinguishable recycling bins alongside general waste bins.

Action 11 – Conduct a detailed cost benefit analysis of implementing or retrofitting alternative waste collection systems

The Property Council recommends that more information needs to be provided as to who would own and maintain the alternative waste systems outlined in this action.

Action 13 – Develop and administer a policy issuing permits to commercial waste and recycling collection operators within the City confines

The Property Council wishes to express its support for this action.

Other Comments

Data

The City of Perth does not currently collect data on the quantity of material collected by its general waste and recycling services for individual premises. The Property Council recommends that the City of Perth include a strategy for monitoring and reporting this data to their commercial customers.

Without this data, business and buildings are unable to effectively monitor their overall waste generation and recycling rates. This causes difficulties when managing waste and monitoring new waste minimisation and recycling initiatives. These difficulties also discourage buildings from seeking a NABERS Waste rating. Where a building manager has a better awareness of their recycling rate, they are more likely to undertake the expense of the NABERS assessment.

Incentives

The current waste system provides no incentives for building owners and developers to minimise their waste. The current costing systems provide no financial benefit to those who make a concerted effort to reduce their production of waste.

Should you wish to discuss the City of Perth's Waste Strategy with us further, please contact our Policy Advisor Rebecca Douthwaite on 9426 1203 or at rdouthwaite@propertyoz.com.au. The Property Council is willing to provide further consultation with the City of Perth as the actions of this strategy are implemented and to support the development of waste guidelines and policies.

Yours sincerely



Joe Lenzo
Executive Director

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Australia**

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