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# Review of the Green Stamp Program in Western Australia

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## **Limitations**

This is an external report commissioned by the Department of Environment and Conservation on behalf of the Waste Management Board of WA. The findings and recommendations contained in the report do not necessarily represent the views of the Waste Management Board.

All care has been exercised in undertaking the preparation of this report. Neither the Board nor the Department of Environment and Conservation accept liability for any loss or damage incurred as a result of any use of the information contained in the report.

Sustainable Strategic Solutions (S3) has prepared this report in accordance with the usual care and thoroughness of the consulting profession for the Department of Environment and Conservation WA. It is based on generally accepted practices and standards at the time it was prepared. No other warranty, expressed or implied, is made as to the professional advice included in this report. It is prepared in accordance with the scope of work and for the purpose outlined in the Request for Quotation.

The methodology adopted and sources of information used by S3 are outlined in this report. S3 has made no independent verification of this information beyond the agreed scope of works and S3 assumes no responsibility for any inaccuracies or omissions. No indications were found during the investigation that information contained in this report as provided to S3 was false.

The report is based on the research undertaken, data provided by stakeholders and information reviewed at the time of preparation. S3 disclaims responsibility for any changes that may have occurred after this time.

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## **Executive Summary**

The Green Stamp program in WA, which currently consists of three schemes, was reviewed. The Green Stamp is a certification/accreditation awarded to businesses that meet beyond compliance criteria developed for each industry. Green Stamp is specifically targeted at small to medium enterprises (SMEs).

The Green Stamp concept is unique in that it involves face to face delivery by an industry association at the business site and has been well received by the industries involved.

The review found there is a high level of commitment to the program by the industry associations and the businesses participating in Green Stamp, however there has been a much lower than expected rate of business accreditation, particularly in the motor trade industry.

The low level of accreditation in the motor trades businesses is due to the much lower than anticipated levels of compliance with legal requirements which is a prerequisite for progressing to the beyond compliance criteria on which accreditation is based. In response to this barrier the MTA scheme has developed a local government initiative which includes training local government officers to work with businesses to improve their compliance, as well as working with other programs such as those run by SERCUL and the Swan Catchment Centre, who have used the Green Stamp criteria and other resources extensively.

This use of program resources, particularly the pioneering of work with local governments which is now leading to greater recognition by local governments of their role in this area, has probably been of great value to the development of SME compliance programs in WA. However the diversion of Green Stamp resources into the compliance area has diverted attention from building the value of the Green Stamp "brand" and therefore delivering rewards to Green Stamp businesses.

There has also been inadequate consideration of data collection, measurement of the program's achievements and evaluation of outcomes which have been poorly defined.

The program has been subject to continuing uncertainty about funding and therefore its continuity which has led to staff turnover and created barriers in persuading key customers to adopt Green Stamp certification as a selection criteria for contracts. The Waste Management Board has provided most of the funding to date, in conjunction with substantial in-kind contributions from the industry associations involved, but from the Board's viewpoint a recurrent funding obligation is not desirable.

There is a lack of overall program coordination, needed to secure other funding sources and to manage the overall strategic planning for the program.

While the program has built some strong relationships, particularly amongst and within the industries involved, there are weak or non-existent relationships with key stakeholders, not only potential funding providers but also with those who can assist in promoting and strengthening the program.

This report recommends Green Stamp:

- Develop a clear list of objectives based on achieving incentives for Green Stamp participants rather than on trying to improve compliance, and develop a strategy based on these objectives;
- Develop measures for the success of the program that reflect the objectives of the program and meet the needs of stakeholders;
- Develop strong messages and a strategy for educating key stakeholders about Green Stamp;
- Focus on influencing Government procurement through inclusion of environmental accreditation/certification as part of the selection criteria for State and Local Government autoservice, printing and cleaning contracts;
- Provide continuity to the Program in the medium term by funding the existing coordinator positions and providing some operational funding;
- Appoint a program manager, reporting to a Green Stamp management committee;
- Review the fees received from certification/recertification to begin generating an income stream which can be used to partially offset the salaries of the coordinator for each scheme;
- Develop a funding strategy and plan to develop new sources of funding;
- Develop milestones for implementation of each of the recommendations above and tie them to funding milestones;
- Develop a strategy for extending the program to other industry sectors; and
- In the longer term consider the option of independent third party audits for re-accreditation/re-certification.

The Department of Environment and Conservation might also consider how to recognise and fund the considerable work being done by the MTA to assist businesses to achieve compliance with regulatory requirements.

## 1. Introduction

The Green Stamp program began with a Waste Management and Recycling Fund (WMRF) grant. The program was developed by the Department of Environment in partnership with the Motor Trade Association (MTA) to encourage best-practice environmental performance within the automotive industry. The success of the program in the motor trades has encouraged the cleaning and printing industries, with support from the Department and the MTA, to establish their own Green Stamp programs.

Light industry (which consists very largely of small and medium sized enterprises (SMEs)) represents a high proportion of all businesses in industrialised economies. Such enterprises have different environmental performance characteristics from their larger counterparts. In particular, they commonly have a higher level of environmental impact per unit; and lower compliance rates with health, safety and environmental regulation. Although their individual environmental impact may be small, their aggregate impact may, in some respects, exceed that of large business<sup>1</sup>. There are 185,000 SMEs in WA and they have a potentially very large effect on the State's environment.

SMEs are notoriously difficult to target through the usual education programs due to the lack of resources and personnel to attend meetings and training courses.

Green Stamp remains one of very few industry driven environment programs for SMEs. The Green Stamp program is delivered directly to businesses through industry associations. One of its strengths is the one-to-one communication between the business operator and the program coordinator who actually goes onto the business premises and provides an assessment of the business's environmental performance and opportunities for improvement as well as assistance in implementing changes. Of course this is also resource-intensive.

As each of the industries has different issues and needs, industry-specific criteria for assessment and measures to reduce each industry's environmental impact have been developed as part of the program.

The Western Australian Waste Management Board and the Department of Environment required the services of a consultant to undertake an independent review of the Green Stamp program. The task included the development of recommendations on the development of a business case for progressing the program and identification of funding opportunities to support the program from July 2007. The review was to include an assessment of the suitability of the program for funding

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<sup>1</sup> Regulating water pollution from light industry, Neil Gunningham and Darren Sinclair, School of Resources, Environment and Society, The Australian National University, May 2004.

under the Board's proposed Strategic Partnership Placement framework, but unfortunately the criteria for funding under this program had not been sufficiently developed at the time the review was completed.

Sustainable Strategic Solutions (S3) is pleased to submit this report to the Department.

### **The required tasks**

The aim of the project was to objectively review the Green Stamp program and assess its strengths and weaknesses as well as the opportunities for improvement and to use this information to assist the schemes to develop a business case for progressing the program. An important aspect of the review was assessing the value of the program in meeting the objectives of the Waste Management Board compared with other aspects of the program.

The consultancy was required to:

- Conduct an assessment of the operational aspects of each of the three Green Stamp schemes in operation in WA;
- Develop an understanding of the interrelations between the three industry sectors including opportunities for enhancement and expansion;
- Clearly define the waste related aspects of the schemes and an assessment of their comparative importance against other activities such as cleaner production, procurement etc.
- Provide recommendations and assistance to the schemes for the drafting of a business case for progressing the program, including the development of Zero Waste Plans and the identification of ongoing funding opportunities to support the schemes from July 2007.

### **Deliverables**

The key deliverable of this project is this report providing a comprehensive picture of existing participation, management practices including funding arrangements, value-for-money, environmental outcomes to date and management plans in place for the overall Green Stamp program and the three individual schemes. The report also provides direction and assistance to Green Stamp participants for the preparation of a business case to carry the Green Stamp program beyond 2006/07 including financials. The business case includes key deliverables and milestones that will demonstrate the ongoing success of the program.

The report includes details describing:

- Level and extent of participation in each of the three Green Stamp programs;

- Level of commitment to the programs by the Industry Associations;
- An assessment of the value of all contributions (financial and in-kind; internal and external) made by all contributors to the program;
- Environmental management activities including but not limited to, waste generation, disposal and recovery data from scheme participants, by scheme and by the program generally;
- Where improvements might be made to waste management activities by Green Stamp participants, particularly in the areas of waste reduction and resource recovery;
- The importance of the program to the Board's Strategic Direction For Waste Management In WA;
- Comment and recommendations on the overall and individual program management of Green Stamp;
- Recommendations for the preparation of a Green Stamp business case, including meaningful and attainable targets;
- Recommendations for increasing participation in Green Stamp programs within the relevant industry sectors; and
- Recommendations for the expansion of the Green Stamp program to other SME sectors.

The original brief also asked for a consideration of the development of generic Zero Waste Plans for SMEs in consultation with participants and DoE. This has not been undertaken at this stage as the Departments' focus has been in developing resources for the development of Zero Waste Plans by local governments, particularly in regional WA.

Similarly the brief asked for an examination of the suitability of the program for funding under the Board's proposed Strategic Partnership Placement (SPP) framework, based upon clearly defined outcomes, milestones and time frames. This was not possible as the SPP framework is still under development.

### **Project approach**

The project was approached in the following stages:

#### 1. Project initiation;

An inception meeting was held with the Department of Environment soon after beginning the project. The purpose of the inception meeting was to:

- Confirm the objectives and deliverables for the project
- Clarify project management and reporting arrangements, and
- Collect available information held by the Department to support the project.

2. An assessment of the operational aspects of each of the three Green Stamp schemes in operation in WA;

A step by step assessment of the three existing Green Stamp schemes was undertaken, beginning with the identification of stakeholders for consultation. These stakeholders included the three industry associations and their members. The level and extent of participation in each of the three schemes and the level of commitment both financial and in-kind by the associations and individual members was determined. Both participating and non-participating members of each of the three associations were consulted to determine the perceived value of the program to businesses.

A sample of clients and customers were also consulted to obtain information about their understanding of the program and its value from their point of view. This consultation with customers and clients was not intended to be definitive market research into brand recognition and power but was to gain information for possible future directions for the program. To date there has been little promotion of Green Stamp accreditation to customers and clients and no evaluation of its customer recognition and this is possibly an area for future attention.

Stakeholders within the Department of Environment and the Swan River Trust and Swan Catchment Council and selected local governments were consulted regarding their views of the value and potential value of the program. Some of these stakeholders have made financial and in-kind contributions to the program and there have been limited audits of Council areas which have included some of the businesses covered by the program.

The impact of environmental management activities undertaken by participants including waste generation and recycling/reuse, improved housekeeping and storage practices and energy and resource conservation was examined though an assessment of the impacts was impeded by the lack of data available. There is some limited data available from local government area studies undertaken in conjunction with the MTA scheme, however these surveys produce a snapshot of the level of regulatory compliance in that area rather than data related to volumes of wastes of wastewater etc.

There is almost no quantitative data from the program. Baseline surveys conducted on businesses entering the program did not provide quantitative data. There were audit results available for the participating businesses and in some cases there have been follow up audits for accreditation (in the automotive industry), but these generate only yes/no/NA responses which are not collated by the industry scheme.

As no data were available the assessment criteria for each of the three schemes were evaluated instead for:

- Coverage of all of the environmental parameters;
- Coverage of all waste material categories to support the development of Zero Waste Plans;
- The level of detail recorded eg. simply by 'recyclables' or residual waste, by broad material categories, or by specific material categories such as HDPE plastic, PET plastic;
- The separate consideration of waste collected for recycling from residual waste;
- Distinction between types of industry participants, and geographic situation;
- Currency; and
- The level of validation that has been carried out.

Information was collated from all schemes regarding:

- Environmental Management Plans, or other mechanisms for monitoring environmental performance including but not limited to the avoidance, recycling and reduction of waste; and
- Targets, if any, already in place within each scheme.

Limitations of the data and any areas of uncertainty are explained.

3. Development of an understanding of the interrelations between the three industry sectors including opportunities for enhancement and expansion;

The work undertaken in the previous stage provided an understanding of the common and differing objectives of the three schemes and highlighted some differences in the methods used for dissemination and data collection. This assessment was used to identify the particular strengths of each of the schemes and the relevance of their methods to the others. While the MTA scheme is the most well established scheme the cleaning and printing industries have also developed unique insights during the development of their schemes that could benefit all the existing and future schemes.

This stage also facilitated the development of recommendations for improving the overall and individual program management. Standardisation of data collection and improved data sharing and reporting is one area likely to benefit from enhanced cooperation between the schemes. There

may be other areas of administration that could be more efficiently managed through sharing of resources.

This stage of the project also identified opportunities for expansion of the Green Stamp program to other industry sectors through consultation with associations that have previously expressed an interest and through examining possible synergies with the existing industry schemes.

4. Clear definition of the waste related aspects of the schemes and an assessment of their comparative importance against other activities such as cleaner production, procurement etc.

The Waste Management and Recycling Fund has provided most of the funding to date for the Green Stamp program. This fund is obtained through the landfill levy and is hypothecated for funding waste management and reduction programs. While many aspects of the Green Stamp program relate to waste reduction and management in the broader sense, several of the objectives such as air quality management and emergency spill management are less closely related to the objectives of the fund and the Board's Strategic Direction for Waste Management in WA.

This stage of the project identified the emphasis placed on each of the environmental management objectives of the program and assessed the impact the program is having on each area. A major driver for the program from the view point of some stakeholders has been the prevention of groundwater and stormwater pollution and the program, particularly for the automotive industry scheme, may have had a substantial impact in this area. It would be particularly interesting to assess the impact the program has had on energy conservation, though again this is not possible using the available data. This assessment assisted in identifying possible future partners for funding of the program. It also assisted in identifying improvements that can be made to the program to increase waste reduction and resource recovery.

5. Recommendations and assistance to the schemes for the drafting of a business case for progressing the program, including the development of Zero Waste Plans and the identification of ongoing funding opportunities to support the schemes from July 2007.

The information obtained from the earlier stages of the project was used to undertake a SWOT analysis of the program. The program's strengths and weaknesses identified previously were used to develop an understanding of the threats to its effectiveness and continuation as well as opportunities for improvements and expansion. Recommendations for the development of a business case including meaningful and attainable targets are provided. The suitability of the program for funding under the Board's proposed Strategic Partnership Placement (SPP) framework has not been assessed as the framework for the program is not complete. Other potential sources of ongoing funding are identified, including other Government agencies: Local, State and Federal. The possibility of at least partial self-funding through fees for accreditation is discussed with an assessment of the changes to the program in terms of participation and customer recognition necessary to make this feasible.

## 2. Assessment of the operational aspects of the three Green Stamp schemes

### Introduction

The Green Stamp program is based on the principles of Community Based Social Marketing (CBSM), which “demonstrate that behaviour change is most effectively achieved through initiatives delivered at the workplace level, focusing on the removal of barriers to an activity while simultaneously enhancing the activity’s benefits”<sup>2</sup>.

The program was initiated in 1999 as a collaboration between the Department of Environment (DoE) and the MTA WA. Since then two other industry associations, the Printing Industries Association WA (PIA) and the Building Services Contractors Association Australia (BSCAA) have adopted it. The BSCAA scheme began in 2003 when funding from the Swan-Canning Cleanup program, under the Swan-Canning Light Industry Project was used to employ a part-time coordinator to work with the Association for four months to develop their scheme. The PIA scheme began in December 2003 with the appointment of a coordinator from the Department of Environment (DoE). This was planned to be the start of a much broader Green Stamp program for SMEs in WA<sup>3</sup>.

The resources and methodology developed for these two new industry schemes are based closely on the MTA WA model.

At the time of the application for Strategic Waste Initiative Scheme (SWIS) funding in November 2004<sup>4</sup> the Green Stamp program had an overall coordinator who also coordinated the cleaning program scheme, based in the DoE (Bernie Riegler), an MTA scheme coordinator based at the MTA WA (Cameron McPhee), and a printing coordinator also based at the DoE, (Tim Scott).

At about the same time as the expansion into the printing and cleaning industries, the program began to develop closer links with local government agencies through developing and trialling three initiatives to directly assist SMEs:

- a training program for local government officers on the impacts and solutions for SMEs, including a range of practical information resources that can be disseminated to their local businesses;
- an automotive SME survey and training session producing a report outlining the general trends of businesses in a particular light industrial area; and

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<sup>2</sup> SWIS funding application, November 2004.

<sup>3</sup> SWIS funding application, November 2004.

<sup>4</sup> SWIS funding application, November 2004.

- building guidelines for local government planning officers who approve and set criteria for new light industrial developments (including automotive workshops), in response to the lack of suitable premises for automotive SMEs.

The 2004 request was for interim funding to the end of 2004, a total of \$92,490 to support three full time positions (coordinators for each of the three schemes with the BSCAA coordinator also having the role of overall program manager) and provide some of the operational expenses (\$5,000) associated with delivering the program.

The Green Stamp Program Manager would be responsible for the program's overall strategic development and expansion of opportunities in other industry sectors, local governments, educational institutions and the broader community. This would provide "the necessary opportunity to begin consolidation of existing programs and expansion of future initiatives".

### **The Motor Trade Association Scheme**

The automotive sector has historically been perceived as a significant threat to the environment due to the numerous hazardous substances and by-products associated with many service and repair processes<sup>5</sup>.

In WA there are over 5,000 automotive retail businesses including mechanical repairers, body repairers, radiator repairers, automotive parts recyclers, engine reconditioners, service stations, automotive dealerships, auto electricians, brake and clutch specialists, farm machinery and tyre dealers.

Common wastes and by-products associated with the industry's activities include<sup>6</sup>:

- Solid wastes such as scrap metal and parts, cardboard, batteries, oil drums, oil filters, used tyres, bumpers and a variety of plastic components;
- Liquid wastes including radiator coolant, used oil, alkalis and acids, organic solvents and wastewater containing degreasers, detergents and other chemical substances;
- Atmospheric pollutants such as volatile organic compounds (VOCs) from solvent-based compounds, as well as greenhouse gases and ozone depleting substances from air conditioning refrigerants.

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<sup>5</sup> Survey of the Environmental Practices of Automotive Businesses in the City of Joondalup December 2005, Cameron McPhee, Motor Trade Association of Western Australia.

<sup>6</sup> Survey of the Environmental Practices of Automotive Businesses in the City of Joondalup December 2005, Cameron McPhee, Motor Trade Association of Western Australia.

It is estimated that over 73.5 million litres of liquid waste, 3000 tonnes (plus another 928,000 m<sup>3</sup>) of solid waste and about 187,000 litres of gaseous waste are produced by the industry in Western Australia annually<sup>7</sup>.

## Funding

The MTA scheme was initiated in 1999 using a grant from the Waste Management and Recycling Fund (WMRF) for \$53,819 (GPE20/99) for the period November 1999-2001<sup>8</sup>.

The grant was requested to provide funding for a full time coordinator, and to develop resources including accreditation criteria and promotional materials.

Grant GCP/18/00 provided funding of \$54,802 for 2001/02 and \$66,233 for 2002/03 for the employment of a coordinator and operating. The MTA WA provided \$41,342 and \$56,934 in-kind support for Years 1 and 2 respectively.

The final project report<sup>9</sup> notes that the coordinator was actually employed on a casual basis for 24 - 40 hours per week during this period.

Training seminars were conducted under a separate contract (GCP/02/00) for \$20,000.

The Minister for the Environment launched the program in November 2002, at which time there were ten accredited businesses.

Grant GCP/01/03 provided \$62,755 to the MTA for the period from June 2003-04. Interim funding to the end of 2004 provided \$21,475 for salary for 1 FTE for 13 weeks.

In 2005 an extension of funding for \$85,000 was sought from the WMRF<sup>10</sup>. This grant was to cover the continuation and expansion of the scheme including \$31,000 for a marketing campaign to promote Green Stamp to the wider community, updating of resources, the assessment and preparation of reports for 20 businesses, local government officer training and a waste reduction scoping project. This scoping project was to identify the status of recycling and reuse of empty liquid packaging by automotive businesses, collect quantitative data on the volumes and types of these containers going to landfill, identify drum and collection services, barriers to recycling and recommend interventions to increase the rate of recycling.

The waste reduction scoping project was not undertaken though an extension of funding of \$85,000 was granted, of which \$65,000 has been invoiced to date<sup>11</sup>. It is unclear whether this funding was for the MTA or spread between the three schemes.

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<sup>7</sup> Accreditation criteria, Mechanical Repairers, Green Stamp program, MTA WA.

<sup>8</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>9</sup> Final Project Report GCP/18/00, 2003.

<sup>10</sup> Major Milestones for 2<sup>nd</sup> Extension of Contract GCP/01/03

<sup>11</sup> File no. 19384, Bianca King, Personal communication.

A milestone report for the period August – October 2005<sup>12</sup> notes that AHG is keen to have its whole group accredited as soon as possible and baseline audits to those businesses not yet accredited had been provided as a priority.

The MTA coordinator had also made visits to business and local government officers in Geraldton, Kalgoorlie, Bunbury and Albany, carrying out assessments against the Green Stamp criteria and preparing reports for the businesses assessed.

A program evaluation was also proposed, consisting of:

- phone interviews of Green Stamp seminar participants to find out whether they had made changes to their practices as a result of attending the seminar;
- phone interviews of businesses that had undergone assessments to find out if they had made changes as a result of the assessment; and
- an analysis of catchment groups and other stakeholders using the Green Stamp resources.

The evaluation was not funded.

Continuation of funding was sought from the SWIS for three years from 2005/06<sup>13</sup>. This funding was to maintain the program and allow its expansion into other light industry sectors.

The Report suggests that the 12 month funding which was obtained will allow the respective industries to seek grants or enter into partnership arrangements with alternate agencies and bodies, for example, the Water Corporation. However, “ongoing State Government support of the Industry-wide program is vital to provide the message to potential alternate funding organisations that the program is credible and successful in achieving its aim of assisting the respective industry’s (sic) manage their environmental impacts”.

Grants have been used to develop materials for the MTA scheme and to employ coordinators to visit businesses and assist them with accreditation. Natalie Sharp is the third coordinator of the Scheme for the MTA and there has been reasonable continuity in the role with no periods without a coordinator.

The MTA Green Stamp scheme has been used as the basis for the development of an Eco-efficiency agreement between the Commonwealth Government and the affiliated State MTA Associations. At the time of the 2004 funding application this funding provided about 4 hours per week of the WA coordinators salary<sup>14</sup>.

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<sup>12</sup> Project milestone report, August - October 2005.

<sup>13</sup> MTA WA Annual Report 2005-06, Green Stamp.

<sup>14</sup> SWIS funding application, November 2004.

During the 2004/05 period, MTA WA was successful in securing an additional 3 years funding to continue the National (Green Stamp) Eco-efficiency Agreement. Federal Minister for the Environment and Heritage, Senator Ian Campbell, approved the extension funding and allocated a further \$900,000 to the initiative.

This Green Stamp Plus Programme is being administered by South Australia (MTA-SA) on behalf of the affiliated Associations of the MTAA. Details of the Agreement were refined during the year and commencement of activities as outlined in this draft Agreement commenced in November 2006. The main objective of the National Program is to bring together the major initiatives that have been developed in different jurisdictions around Australia to form a national set of resources and information which promotes best environmental practices. Where appropriate, the new program will incorporate the use of a new tool, called EcoMapping, widely used in Europe to help SMEs meet ISO14001 requirements<sup>15</sup>.

The national funding includes \$35,000/year for the WA branch of the MTA, which should benefit the current Green Stamp program:

- 25 businesses per year will be assessed and some are likely to join the accreditation scheme;
- Survey results generated from the national program will be beneficial for the WA Green Stamp program; and
- The state-based program will benefit as the Federal funding, combined with State funding allows a full time staff member for Green Stamp program initiatives and environmental issues<sup>16</sup>.

#### Scheme focus and resources

The MTA scheme has identified and focuses on several key areas considered essential to reducing the environmental impact of the automotive industry<sup>17</sup>:

- Storage practices associated with chemicals and other hazardous substances;
- Pre-treatment of wastewater from the workshop prior to approved disposal;
- Spill management to prevent pollution of ground and stormwater systems;
- Correct disposal of waste products (preferably to recycling or reuse);
- Air quality management;

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<sup>15</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>16</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>17</sup> For example Accreditation criteria, Mechanical Repairers, Green Stamp program, MTA WA.

- Energy and resource conservation; and
- The development and implementation of environmental management plans.

The program aims to “develop a fair and equitable environmental accreditation for the automotive trades”, encouraging automotive businesses to comply with environmental laws and rewarding those that have gone beyond their legislative requirements.

According to the introduction to the accreditation criteria an increasing concern for the environment by business owners and consumers in recent years has seen a general shift in attitude and practice in the automotive repair industry. A growing number of businesses are operating their processes or managing particular wastes to a standard never previously achieved in Australia.

However the introduction notes that despite these achievements, the industry is still often recognised as being significant polluters due to the obvious environmental impact many traditional practices continue to have. One of the Green Stamp’s objectives is to start changing that belief by showing consumers that many workshops are including environmental considerations in their operations. The Green Stamp Accreditation is therefore a marketing tool for automotive businesses to prove to their customers their commitment to good environmental management. It aims to educate the consumer and appeal to their environmental conscience, encouraging them to utilise the services of a Green Stamped Accredited business.

Upon accreditation the business receives a ‘Promotion Pack’, including:

- Certificate of Accreditation
- Pamphlets to promote the businesses environmental commitment to customers
- Signage stickers that can be displayed throughout the premises
- Green Stamp service stickers
- The Green Stamp logos (eps & jpeg images)

Accreditation confers the right to display the Green Stamp logo anywhere on the premises or on any of the business’ stationary or signage, the right to promote the business as “Green Stamped” and the opportunity to benefit from the Green Stamp’s own marketing campaign.



Generally, accredited businesses display their certificate at the reception area, along with their environmental policy, which must be displayed as part of Level 3 accreditation. Pamphlets are usually made available to customers here, and are picked up by customers as the trays to hold them are often empty when the coordinator visits. The coordinator restocks the pamphlets when she visits premises but is planning to try to trigger a phone call for more brochures by placing a sticker on the tray with a contact number for refilling.

One or two businesses have used the Green Stamp logos supplied to create large signs for street directory listings of businesses in an area. There does not seem to be any problem with encouraging businesses to display the accredited workshop sign or certificate, with the exception of one dealership, which prohibits the display of any material that might “clutter” the show room. Natalie Sharp is working on alternatives for this business, for example using its web site to promote the Green Stamp accreditation.

The service stickers with the Green Stamp logo are designed to be placed on the windscreens of cars following service with a reminder date for the next service. The stickers have not been provided to businesses, probably due to a lack of continuity in the coordinator role, but the coordinator is about to start offering them to Green Stamp businesses. Many businesses will already have their own stickers with their own logo so there may be limited use for this promotion tool.

In the first year money was spent on radio commercials to create awareness of the program and attract automotive businesses to become Green Stamp accredited<sup>18</sup>. It was also intended<sup>19</sup> that accredited businesses such as the RAC would advertise that they were Green Stamp accredited and this would encourage others to participate as well as raising public awareness.

Other promotional ideas included messages on the RAC waiting line encouraging car owners to ask about Green Stamp accredited businesses to service their cars and for the small business development corporation to provide information about Green Stamp to new automotive businesses.

At this stage of the program there was a plan to approach sponsors, but this does not seem to have occurred.

For the Motor Trade Association assessment, criteria have been developed for:

- Body repairers;
- Mechanical Repairers; and
- Dealerships.

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<sup>18</sup> WMRF funding application, February 2000.

<sup>19</sup> WMRF funding application, February 2000.

There are three levels of assessment:

- **LEVEL 1** - *Legal compliance* is the basic entry requirement into the Green Stamp Accreditation. The environmental criteria in this level establish that businesses hold all relevant permits and licences, and are operating in a manner that meets all legislative requirements. The criteria detailed in Level 1 have been designed to incorporate other important considerations contained within relevant industry Codes of Practice.
- **LEVEL 2** - Businesses must achieve the Level 1 requirements plus demonstrate that they have moved *beyond compliance* to incorporate a minimum number of sound environmental management practices into their day-to-day operations. This could include the recycling of particular wastes, use of less toxic chemicals, inclusion of more efficient systems that minimise resource use, emergency spill kits or energy saving devices.
- **LEVEL 3** – This is the top level of accreditation. It is based on the principle of *continual improvement*, and requires businesses to develop and implement an environmental management plan to help monitor and review their current practices and set objectives or targets for further improvement.

None of the criteria generate any quantitative data for the program. The audit is in the form of YES/NO/NA responses as to whether the auditor is satisfied the criteria have been met.

Members pay \$150 (+GST) for initial accreditation and \$50 (+GST) each year for renewal. Non-members pay \$250 (+GST) for accreditation and \$70 (+GST) for renewal. The initial assessment is free.

The MTA believes industry will not pay more for the program, as environmental management is not seen as a high enough priority.

The reaccreditation visit takes from 1.5 – 2 hours each year and is an opportunity to provide businesses with information about recyclers and suppliers etc<sup>20</sup>.

In addition to the assessment and accreditation criteria a number of other resources and services have also been developed including<sup>21</sup>:

- **Environmental audits** by MTA staff to identify any current environmental impacts and provide practical solutions and follow-up support to assist in their implementation. These assessments are obligation-free, strictly confidential and are available free of charge to all MTA-WA members;

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<sup>20</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>21</sup> For example Accreditation Criteria, Mechanical Repairers, Green Stamp program, MTA WA.

- Industry specific *Environmental Guidelines* that identify environmental issues relevant to the motor trades, and suggest practical solutions and parties that can assist in their mitigation. A broad range of guidelines are available including information about oil separators, cleaning up spills, bunding, purchasing spill kits, solvent recycling machines and building new premises;
- Via the *Environmental Product and Service Directory*, the Green Stamp has identified various product and service providers in Perth that can help automotive businesses implement their environmental initiatives;
- *Environmental training seminars* are delivered to workshop owners, managers and employees to help raise awareness of the environmental impacts of the industry and practical methods of responsible environmental management. Some of the issues addressed include legislation and licensing, wastewater management, recycling and reusing wastes, managing spills, containment and storage practices and environmental management systems. There is a fee for these seminars: \$22 for members and \$55 for non-members.
- The *Cleaner Times* - a cleaner production newsletter for WA's automotive industry - keeps businesses informed and up-to-date with issues relating to their business operations. Articles address issues of legal compliance, environmental responsibility and technological innovation.
- Formats for simple Environment Management Plans (EMP) for each sector with four key elements:
  - Environmental Policy
  - Permits and Licenses likely to be required
  - Environmental Impact Survey (an audit tool)
  - Review Audits

Many of the written resources are available on the MTA web site<sup>22</sup>.

The Cleaner Times newsletter was produced at intervals but the last edition was produced in February 2005. This newsletter was sent electronically to a large mailing list including members of the industry but also to local and state government and community groups as well as other industry groups.

Green Stamp has a dedicated column in each bi-monthly edition of the MTA's MOTOR magazine<sup>23</sup>.

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<sup>22</sup> [www.mtawa.com.au](http://www.mtawa.com.au)

<sup>23</sup> Natalie Sharp, MTA WA, Personal communication.

The Environmental Management Plan (EMP) includes a format for recording waste sent to landfill, which would be a very useful source of data if the Green Stamp scheme collected it. It is currently an optional part of the EMP and if it is used, is kept by the business<sup>24</sup>.

The 2005-06 Annual Report<sup>25</sup> notes that numbers of attendees to the environmental seminars were down on previous years, which may be due to little environmental legislation being enacted during the year, with only 25 individuals participating in the three seminars held. The Report states that the low numbers of attendees is of concern given significant penalties associated with causing environmental harm or pollution, and greater consideration into more effective means of delivering the message to members is required.

#### Green Stamp participants

At least in the past year (2006) all of the approaches the MTA has made to members have been based on an interest expressed by the member; there has been no need as yet to try to persuade companies to participate<sup>26</sup>. There are currently 48 green stamp participants, all with level 3 accreditation. Once companies join, they remain in the scheme. Twelve participants are franchisees of AutoBahn, five are branches of RAC Autoservices. Nine businesses achieved accreditation in 2002, six in 2003, ten in 2004, five in 2005, and sixteen to date in 2006.

Green Stamp participants fall into several categories:

- Fifteen automotive dealerships;
- Twenty-eight mechanical repairers;
- Three body repairers; and
- One vehicle rental business.

The vehicle rental business was accredited using the Mechanical Repairer's criteria as most rental businesses have a workshop and similar issues to repairers but in time with more rental businesses joining the scheme it may be worth developing a set of criteria specific to the sector.

The relatively low number of participants, after five years of implementation, and the fact that all participants are at the highest level of accreditation indicates that once businesses can achieve legal compliance there is little extra work to achieve Green Stamp accreditation, even at the higher level. This is particularly the case where workshops are able to use a corporate Environment Management Plan, for example the AHG businesses<sup>27</sup>.

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<sup>24</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>25</sup> MTA WA Annual Report 2005-06, Green Stamp.

<sup>26</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>27</sup> Natalie Sharp, MTA WA, Personal communication.

Conversely, the low numbers indicate that many businesses are not able to achieve legal compliance.

This is confirmed by the large number of businesses undergoing formal environmental assessments of their workshops that includes a detailed report identifying any issues of legal and/or environmental concern to their business. In 2005-06 there were 42 businesses using the Green Stamp program in this way<sup>28</sup>. By the time of preparation of the 2005-06 report over 160 automotive workshops had participated in the environmental assessments, with the majority of the reports being framed within the context of the Green Stamp Accreditation.

Businesses commonly request information and advice to assist them in implementing their environmental initiatives and addressing their compliance requirements.

The biggest barrier to participation is meeting the legal requirements, for example for oil-water separators and wash-down bays or spray booths. The project report for the second stage of the program<sup>29</sup> notes that of thirty-two automotive repair workshops audited, half undertake repairs outside of their undercover area, and only 47% had spill kits available. The two major issues were the containment of liquid wastes and wastewater management. The costs of new equipment can be in the region of \$70,000<sup>30</sup>. Solvent recycling is also a big issue, with solvent waste usually being handled by a liquid waste transporter. One option might be the provision of communal recycling machines for each area<sup>31</sup>.

A survey of environmental practices of automotive businesses in the City of Joondalup, undertaken by Cameron McPhee<sup>32</sup> while coordinator of the MTA Green Stamp scheme, found that 69% of businesses identified the 'Likely Cost Involved' as the most significant barrier preventing them adopting and implementing better environmental management practices.

Whilst there is considerable scope for businesses to implement smaller environmental initiatives at little or no expense (eg. waterwise trigger attachments, storage and containment practices), it is the larger financial commitments, such as wastewater treatment systems, that represent the most significant barriers for these businesses.

Other barriers to improving environmental performance included "Lack of Government Assistance" (46%), "Lack of Environmental Expertise" (23%), "Lack of Time and Staff Resources" (15%) and "No Evidence of Likely Benefits" (15%).

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<sup>28</sup> MTA WA Annual Report 2005-06, Green Stamp.

<sup>29</sup> Final report GCP/18/00.

<sup>30</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>31</sup> Peter Fitzpatrick, MTA WA, Personal communication.

<sup>32</sup> Survey of the Environmental Practices of Automotive Businesses in the City of Joondalup December 2005, Cameron McPhee, Motor Trade Association of Western Australia.

This survey<sup>33</sup> was funded by the City of Joondalup's Sustainable Community Funding Program. The project aimed to foster greater business understanding and awareness of issues of environmental concern, and encourage further industry uptake of environmental best practice initiatives.

The project focused on a range of issues including regulatory compliance, sound waste management practices, safe storage and containment of hazardous substances, wastewater pre-treatment and disposal, resource conservation, air quality and a range of other environmental management considerations.

The survey results indicate that the majority of the 35 businesses surveyed would not be compliant with relevant legislation:

- 42% of the businesses wash or detail cars in areas where the wastewater drains to stormwater, open ground or on-site soakwells;
- 35% of the businesses are discharging contaminated water from floor washing directly to the environment;
- 52% of businesses that would be expected to generate oily wastewater (eg. mechanical repairers, engine reconditioners, automotive dismantlers) have no equipment or infrastructure for managing process wastewater from their business activities, consistent with the national survey data that suggests that 49 percent of businesses in these sectors did not have appropriate wastewater management systems;
- Of the 54% of businesses with oil separation systems, 32% either had no routine maintenance schedule or have not serviced their system since it was commissioned;
- Most businesses were using traditional solvent-based degreasers which can significantly reduce the ability of separation systems to act as efficient oil traps, so that water passing through the system is not adequately pre-treated and the businesses are likely to be in breach of the Water Corporation's acceptance criteria for industrial effluent;
- 74% of businesses either had no spill products other than rags, or had insufficient absorbents to effectively contain and clean up the largest possible spill events at their workshop;

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<sup>33</sup> Survey of the Environmental Practices of Automotive Businesses in the City of Joondalup December 2005, Cameron McPhee, Motor Trade Association of Western Australia.

- Only four businesses (11%) had formally documented spill management procedures and three of these businesses (9%) had provided formal spill management training to their staff, compared with 51% and 52% nationally;
- 29% of businesses producing coolant / glycol waste are illegally disposing of these fluids to open ground, on-site soakwells or stormwater drains, more than double the national average of 12%;
- Consistent with national averages, 37% of survey respondents currently dispose of used oil filters to general waste, in breach of the Controlled Waste Regulations which require they be handled by licensed carriers, generally because businesses are not aware of their legislative responsibilities;
- 15% of businesses with solvent-based units are not managing these fluids in accordance with their regulatory obligations, either disposing of solvent wastes through their oil separation systems, or mixing it with used oil;
- Of the three businesses generating acid/alkali liquid wastes, two are using a licensed waste contractor while the remaining business is in breach of their regulatory obligations because they are discharging spent fluids through their oil separation system;
- Only two businesses indicated they are having brake pads and other asbestos components removed in accordance with the requirements for such materials. The remaining 93% of businesses dispose of brake pads to general waste.
- 50% of businesses that undertake tyre-related work are disposing of used tyres to general waste;
- Approximately half of the survey respondents cannot demonstrate due diligence with regard to minimising potential sources of pollution from hazardous or toxic chemicals arising from their business activities;
- 37% of survey respondents indicated that they either service, repair, commission or decommission automotive air conditioning systems as part of their business activities. Of the 13 businesses working on these systems, eight businesses (62%) reclaim A/C refrigerants for approved disposal; three businesses (23%) recycle gases in-house, and the remaining two businesses (15%) vent A/C gases directly to the atmosphere.

If this survey is typical of the industry in WA it is apparent that the immediate need is for assistance in achieving compliance with legal obligations.

Of particular interest is the perception that there is lack of government assistance to achieve improvements in environmental performance. While government 'assistance' is often regarded in terms of direct financial support to business (e.g. rebates and tax breaks), there is an opportunity

for local government to broaden this definition to include assistance in the form of information, education and waste management services such as cardboard recycling<sup>34</sup>.

The “No Evidence of Likely Benefits” cited by 15% of businesses is also interesting as they obviously do not perceive that they are at risk of enforcement action.

There is practically no enforcement of Environmental Regulations, for example the Unauthorised Discharge Regulations. Local Governments do not have the resources or the training to enforce the Regulations<sup>35</sup>.

#### Local Government Initiative

Green Stamp has widened its scope to assist local governments to work in partnership with local automotive businesses to reduce pollution, and where possible, help improve the overall environmental standard of their operations.

The Green Stamp's Local Government Initiative has two key components:

- An officer training package; and
- An environmental survey and consultancy service.

The training package consists of the following resources and initiatives<sup>36</sup>:

- *Environmental Training Seminar* – the 3-hour seminar covers a range of environmental management considerations relevant to automotive workshops. Emphasis is given to interpreting new and existing environmental legislation in the context of the automotive trades, and the implications these laws have on the way many businesses manage their wastes and perform certain activities.
- *Resource Kit* – The *Local Government Environmental Resources for Automotive SMEs* expands on the information delivered during the seminar, and includes additional resources such as an Environmental Product and Services Directory, fact sheets, environmental guidelines and environmental self-assessment documents for both mechanical repairers and body repairers. Digital copies of these documents are provided so that local government officers can re-print and distribute them as required.
- *Environmental Assessment* – a free environmental audit is conducted on council's own workshop/depot to assess their current level of compliance, and to identify opportunities for future improvement. Officers participating in the training seminar are encouraged to attend this

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<sup>34</sup> Survey of the Environmental Practices of Automotive Businesses in the City of Joondalup December 2005, Cameron McPhee, Motor Trade Association of Western Australia.

<sup>35</sup> Peter Fitzpatrick, MTA WA, Personal communication.

<sup>36</sup> Survey of the Environmental Practices of Automotive Businesses in the City of Joondalup December 2005, Cameron McPhee, Motor Trade Association of Western Australia.

audit to further assist them in understanding how the information delivered during the seminars can be applied to automotive operations.

To complement the information and resources contained within the Officer Training Package, the MTA has developed an audit document to assist local government wishing to be more proactive in the on-going monitoring and evaluation of changes in environmental practices or legal compliance by businesses operating within their jurisdiction.

There is often a lack of understanding by both local government (and business in general) as to how environmental legislation relates to the day-to-day operations of particular industry sectors. The audit document overcomes this problem by identifying current environmental compliance requirements for automotive repairers.

The objective of the training package is to provide local government officers with an insight into the various environmental challenges confronting the industry and to equip them with the knowledge, skills and resources to address these concerns with local businesses.

To date<sup>37</sup>, the training package has been delivered to 20 officers from the cities of Bayswater, Joondalup, Armadale and Wanneroo, as well as sustainable industry officers from the Swan Catchment Council.

The environmental consultation service involves an 'on-ground survey' of the environmental practices of automotive businesses in a particular municipality or industrial precinct. The survey findings and accompanying recommendations are presented to council as a summary report. The MTA delivered this initiative to the City of Joondalup during the year, as discussed above.

Recognising the barriers to participation in Green Stamp, the MTA WA sought funding from the Product Stewardship for Oil Program to establish a pilot project for a rebate program that will encourage smaller automotive businesses to invest in suitable equipment and infrastructure to manage oily wastewater generated through processes such as washing vehicles, degreasing engines and parts, and cleaning workshop floors.

Typical wastewater treatment systems – comprising graded washpad, collection sumps, oil separation equipment and associated plumbing – generally cost between \$10,000 and \$20,000 to commission – with oil/water separators accounting for approximately \$4,000 of the total price<sup>38</sup>.

This infrastructure is beyond the financial capability of many smaller operators, particularly when the systems provide little to no return on the investment.

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<sup>37</sup> MTA WA Annual Report 2005-06, Green Stamp.

<sup>38</sup> MTA-WA Funding application Product Stewardship for Oil Program, January 2006.

The pilot program was to be delivered in partnership with the City of Bayswater, initially targeting businesses in the municipality. It was proposed that a rebate of \$4,000 be available to 25 businesses in the project area. The project would complement the council's existing Automotive Industries Environmental Awareness Program – which seeks to engage local workshops in issues of environmental concern and stimulate movement towards environmental best practice. The MTA's Green Stamp Program was a key stakeholder in the development of this program and the training of the officers undertaking on-ground environmental inspections of automotive workshops as part of the Green Stamp Local Government Initiative.

The City of Bayswater was to assist in the promotion of the project to local businesses, and based on the results of their automotive inspections, recommend businesses believed to be both eligible for, and in most need of, financial assistance to establish wastewater infrastructure. Where possible and/or practical, the City would also endeavour to fast-track any council approvals (eg. building approvals) required by successful applicants.

The MTA was to verify eligibility for the rebate, and facilitate all other aspects of the project – including administrative and technical support, environmental assessments, and management of project funds. The rebate would only be available to businesses with six or less employees who agree to achieve Green Stamp accreditation before the rebate was issued.

MTA WA believed this pilot project would demonstrate the potential role that economic incentives/rewards can play in encouraging industry investment in environmental technologies and other best management practices, and lead to an ongoing rebate program.

The principal objectives of this project were to:

1. Provide smaller automotive workshops with sufficient (financial) incentive to encourage them to establish dedicated washdown facilities at their workshops.
2. Foster the transfer and uptake of pollution abatement technologies and other environmental best practice initiatives;
3. Mitigate stormwater pollution concerns; and
4. Further contribute to the volume of used oil recovered for recycling in Australia.

This funding application was unsuccessful, however the Product Stewardship for Oil Program was interested in funding a pilot program in which 15 businesses would receive rebates of \$10,000 to \$15,000 to purchase water-oil separators. The MTA did not feel this would have a large enough impact on the industry<sup>39</sup>.

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<sup>39</sup> Peter Fitzpatrick, MTA WA, Personal communication.

## Stakeholder perceptions

The MTA has a strong belief in the value of Green Stamp and has used it as the basis for a national program funded by the Federal Government.

There is quite widespread interest in the program, for example, the Green Directory website has recently sought a partnership with Green Stamp<sup>40</sup>.

The 2005-06 Annual Report<sup>41</sup> notes that Green Stamp provides a credible verification of environmental performance and that with continued government support of the Program, industry is placing greater confidence in the value of the Green Stamp label. The Report also anticipated that the coming year (2006-07) would have the greatest number of new participants included in the accreditation scheme to date, a prediction that seems to be being borne out.

The Report notes that Government procurement policies and tendering processes could provide a significant catalyst for the Green Stamp Accreditation, however most state and local government agencies have yet to formally acknowledge the environmental commitment that has been made by accredited businesses. The MTA is continuing to encourage government agencies to recognise and support businesses that are demonstrating best practice environmental management at their workshops.

The MTA WA continues to promote Green Stamp through involvement on committees and presentation of papers at relevant environmental conferences.

The MTA would like to provide a variation of the current criteria to motor parts suppliers and those in the refrigerated transport sector<sup>42</sup>.

With the development of the national program, which has a more risk-based focus, the idea of Ecomapping might alter the criteria<sup>43</sup>. The Ecomapping approach looks at the layout of the premises, connections to stormwater drains and chemical storage etc and identifies areas of high risk.

The coordinator would like to adjust the scheme criteria for larger companies in particular. The accreditation criteria are used as a checklist, which is very useful, but it would be better if accredited businesses chose a few areas to focus on each year and then really put effort into those areas instead of ticking off a large number of items without in-depth consideration of continuous improvement<sup>44</sup>. The cleaning industry scheme requires the business to nominate a minimum of five objectives they will aim to achieve in the following twelve months and printing industry scheme has the option of choosing a few issues to concentrate on each year.

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<sup>40</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>41</sup> MTA WA Annual Report 2005-06, Green Stamp.

<sup>42</sup> Peter Fitzpatrick, MTA WA, Personal communication.

<sup>43</sup> Natalie Sharp, MTA WA, Personal communication.

<sup>44</sup> Natalie Sharp, MTA WA, Personal communication.

The criteria should also be reviewed to ensure they still require best practice as they were developed several years ago and there has been improvement in standards and practices that should now be incorporated into the criteria.

The MTA also recognises the lack of data collection is an issue.

Natalie Sharp is currently gaining qualifications to deliver occupational health and safety assessments to the industry. This program, the ThinkSafe Small Business Assistance Program, is well funded by WorkSafe and is a higher priority for most businesses than environmental management as OH&S requirements are entrenched in the workplace culture and reinforced by strong enforcement, unlike environmental requirements. Natalie believes there may be an opportunity to combine Green Stamp audits with safety audits. The WorkSafe program will pay the MTA \$495 (including GST) for each assessment, providing a revenue stream to fund the work: for businesses under 20 employees. There is no fixed volume on the number of audits to be undertaken. The audit requires about 3 hours at the business and then additional time to write the report and action plan for the business and develop a Safety Management System based on proformas and a checklist.

According to the MTA the funding received from the WMRF is not adequate to maintain or grow the scheme. There is only \$25,000/year, which does not even cover the coordinators salary. The MTA wants “decent funding to do a decent job”<sup>45</sup>.

There is also no other support in kind from the Department in the form of promotion, enforcement or education. A marketing meeting was held with the DoE in September 2005<sup>46</sup> to discuss the development of a marketing program for Green Stamp. This meeting was attended by Clinton Scott, Bernie Riegler, Cameron McPhee from the MTA, Paul Nieuwhof from the PIA, Ian Westoby from the BSCAA and Greg Allen and Alison Blake from the Department.

It was decided that television and radio advertising was too expensive and the ad/competition in the printed media had been tried but failed. It was decided that the best approach was to work with certified businesses and potential customers such as local governments and WALGA.

It was agreed that following the move from the Hyatt Centre to the Atrium the Department would assist in developing the web page for the PIA/BSCAA schemes, targeting businesses to promote Green Stamp, and developing a promotional starter kit for new certified businesses containing logos, stickers etc. The outcome was that Clinton Scott developed the web site and following his relocation to the PIA/BSCAA offices he developed the brochures for customers based on the MTA's existing version. Green Stamp had no other budget for marketing so did not pursue the promised assistance from the Department<sup>47</sup>.

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<sup>45</sup> Peter Fitzpatrick, MTA WA, Personal communication.

<sup>46</sup> Project milestone report, August - October 2005.

<sup>47</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

There appears to be no plan to promote Green Stamp in the 2006/07 DEC communication strategy<sup>48</sup>.

In general the MTA finds it difficult to work with the Department of Environment and Conservation, and although Green Stamp is often perceived as a Departmental program “no-one in the Department takes responsibility for Green Stamp”<sup>49</sup>.

There is generally low awareness of the program in Government. Peter Fitzpatrick has discussed Green Stamp with the Treasurer, who was not aware of the program. It might be important to raise the profile of the program with the rest of government.

The MTA is planning discussions with the Water Corporation as the program is of direct relevance to their business. There are many motor trade businesses based in areas such as Bayswater (the centre of the water catchment area), Wangara (on the water mound) and Jandakot<sup>50</sup>.

The MTA wants to implement Green Stamp in the South-West, for example Bunbury, where there are drivers such as community concern and the need to protect tourism assets but lacks the resources needed.

The MTA would also like to work more with local government as they have in Joondalup and Bayswater. There are very good synergies between Green Stamp and the work of local governments. The Shire of Wanneroo wants a Green Stamp seminar for local government officers. SERCUL is doing audits of small businesses in Cockburn and Jandakot and they refer business to Green Stamp.

The MTA is also keen to work more closely with the Swan Catchment Council, which is beginning work in the SME area.

The MTA promotes Green Stamp in all its information. The MTA has taken more ownership of Green Stamp than have the new industries: the printing and cleaning industries use the Department's website rather than hosting Green Stamp as part of their own sites. The MTA has a fair amount of pride and ownership of the Green Stamp program<sup>51</sup>.

The MTA hopes that Autobahn is about to start advertising its Green Stamp accreditation, once the final franchisee members have been accredited<sup>52</sup>. This should create more recognition and value for the Green Stamp brand.

Unfortunately it seems Autobahn will not be promoting itself as Green Stamp accredited for quite some time as they cannot do so until all the members of the chain have been accredited and there are plans to open further franchises as the market is “not yet saturated”<sup>53</sup>.

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<sup>48</sup> David Darcy-Burke, Personal communication.

<sup>49</sup> Peter Fitzpatrick, MTA WA, Personal communication.

<sup>50</sup> Peter Fitzpatrick, MTA WA, Personal communication.

<sup>51</sup> Peter Fitzpatrick, MTA WA, Personal communication.

<sup>52</sup> Natalie Sharp, MTA WA, Personal communication.

Autobahn has begun advertising itself as “environmentally friendly” and the response from the public seems good. Ken Lee feels there is not much interest in Green Stamp from the public as they don’t really know what it means. Autobahn provides brochures on counters in its reception areas and the Code of Practice, which mentions Green Stamp and has the Green Stamp logo is also displayed.

Autobahn has been part of the Green Stamp scheme for two to three years but has really fully implemented it in the last year. Green Stamp is seen as a good marketing tool but also as the right thing to do, as it helps improve the environment.

The program could be improved through greater public awareness<sup>54</sup>, for example the local community in Ballajura would have no understanding of what Green Stamp accreditation means. Advertising in local papers helps, however Autobahn has found that advertisements on the front and back pages of community papers are the most useful as people often don’t read the paper. Autobahn would not be prepared to pay higher accreditation fees to cover the costs of promoting the scheme but feels this promotion is urgently required.

The industry is starting to have significant costs in complying with environmental protection requirements. For example each mechanic servicing car air-conditioning has to be nationally accredited through a Federal requirement, meaning significant costs for training and licensing, lost when the mechanic leaves the business. It has also been costly in some cases to make changes to the Autobahn businesses to comply with Green Stamp requirements. The lack of State government enforcement is a major problem as it means businesses not doing the right thing are able to operate more cheaply and undercut businesses like Autobahn that are complying with the law.

The RAC strongly supports the Green Stamp scheme but “it should be made compulsory” as there are many bad practices in the industry<sup>55</sup>. The RAC is committed to Green Stamp as looking after the environment is the right thing to do. Customers often ask how the workshop disposes of used oil filters.

Implementing Environmental Management Plans is part of the Manager’s KPIs at all sites. Five of the six RAC workshops are accredited, while the sixth needs to improve its bunding. The RAC plans to open another two to three workshops in the next year, all will be designed to meet the Green Stamp criteria and will be accredited before opening. The RAC does advertise its Green Stamp accreditation in the ‘Open Road’ magazine and provides pamphlets in its customer lounges where the certificate is also displayed.

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<sup>53</sup> Ken Lee, Autobahn, Personal communication.

<sup>54</sup> Ken Lee, Autobahn, Personal communication.

<sup>55</sup> Wesley McClelland, RAC, Personal communication.

## Printing Industry Association Scheme

The printing industry is one of the largest manufacturing sectors in Australia employing more than 115,000 people. In Western Australia more than 7000 people are employed in the industry, with small to medium businesses dominating with 85.3% employing less than 20 people.

The Printing Industry Association has 140 members who would produce 80% of the State's printing (excluding newspapers). There are probably 350 "printers" in the State but many are actually photocopiers/shopfronts who outsource the printing. The industry is consolidating and moving towards shopfronts with only a few mega-sites for printing.

The industry impacts on the environment in a number of ways, affecting air and water quality, and contributes to landfill.

Some of the waste products associated with the printing industry include:

- *Solid wastes* such as waste paper, cardboard, scrap metal, shrink wrap, chemical and ink drums containers, label release liner, used rags, wooden pallets, blanket rolls, toner cartridges. Although some of these products are being recycled, at present there is still a large volume going to landfill.
- *Liquid wastes* including used cleaning solvents, prepress chemicals and other chemicals that can end up in rivers, wetlands and coastal regions when disposed of incorrectly.
- *Atmospheric wastes* including solvent-based inks and chemicals that contain VOC's (volatile organic compounds) which contribute to photochemical smog.

## Funding

The printing industry's Green Stamp scheme commenced in December 2003 with the appointment of a coordinator from the Department of Environment. The position was funded by the WMRF for 6 months<sup>56</sup>.

The main objective of the initial program was to work with a trial group to establish the environmental impacts of the industry and to benchmark current best practice environmental management. This information provided the framework for developing draft accreditation criteria for this industry.

It is unclear how much funding the scheme has received in total, however interim funding for July 2004 to the end of 2004 provided 1 FTE for 26 weeks at \$31,015. From August 2005 the printing industry scheme had about \$32,500 funding for twelve months<sup>57</sup>.

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<sup>56</sup> SWIS funding application, November 2004.

<sup>57</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

The Printing Industry Association has contributed to the scheme through in-kind computers, office space, and management of staff. The WA Regional Manager for the Association, Paul Nieuwhof, is now the national Environmental Manager for the Association and will use this role to promote Green Stamp.

Clinton Scott is employed fulltime as a Green Stamp Coordinator for the Cleaning and Printing Industries schemes. Clinton is the third or fourth person in this role. He works out of the Printing Industry Association office but spends roughly 50% of his time on each scheme. Clinton has been in the position for about 12 months.

#### Scheme focus and resources

The program has identified and focuses on several key areas considered essential to reducing the environmental impact of the printing industry:

- Correct disposal of waste products (preferably to recycling or reuse);
- Storage practices associated with chemicals, inks and other hazardous substances;
- Wastewater management;
- Prevention of pollution of ground and stormwater systems;
- Energy and resource conservation; and
- The development and implementation of environmental management plans.

The Baseline Environmental Assessment has been specifically designed to:

- (a) act as a preliminary survey;
- (b) assist businesses in gaining a better understanding of their legal obligations and requirements; and
- (c) 'benchmark' the environmental criteria and actions that will be assessed as part of the Green Stamp certification.

The assessment criteria have been split into three (3) levels to represent the various levels of environmental certification a business may apply for, with Levels 2 and 3 being Green Stamp certification:

- Level 1 – Basic Compliance
- Level 2 – Beyond Compliance
- Level 3 – Continual Improvement

There is a graduated scale for fees for certification, based on the number of staff employed. The rates for non-member companies are double the rates for members.

Company size	Certification fee	Recertification (yearly)
Small (1-15 staff)	\$99	\$55
Medium (16 – 40 staff)	\$220	\$110
Large (> 41 staff)	\$440	\$220

Table 1: Schedule of certification fees

Fee revenue is used to cover some of the costs of the program, for example printing and conference costs.

There is also a range of other resources available to the industry through the scheme<sup>58</sup>, including:

- five Guidance Notes relating to everyday practices and issues within the printing industry:
  - Chemical and ink management
  - Environmental law
  - Protecting Stormwater drains
  - Solid waste management
  - Wastewater management
- Via the *Environmental Product and Service Directory*, the Green Stamp has identified various product and service providers in Perth that can help printing businesses implement their environmental initiatives.
- *Environmental training seminars* are delivered to business owners, managers and employees to help raise awareness of the environmental impacts of the industry and practical methods of responsible environmental management. Some of the issues addressed include legislation and licensing, wastewater management, recycling and reusing wastes, containment and storage practices and environmental management systems.

Most printers display their Green Stamp certificate. Some businesses also include the Green Stamp logo on their stationery and in advertising<sup>59</sup>.

In July 2006 the coordinator had pamphlets produced for each of the cleaning and printing schemes, explaining the Green Stamp program to customers and what certification involves. These pamphlets have been well received by the printing industry, being provided to customers at reception and also sent out with invoices. The pamphlets cost about 75c each as the initial print run was for 500 of each pamphlet. The artwork is available to accredited members of the printing

<sup>58</sup> <http://community.environment.wa.gov.au>

<sup>59</sup> For example, Printsmart, Angela Yates, Personal communication.

industry so that they can print their own pamphlets (with the specification that they must use recycled stock) and several businesses have requested the artwork for this purpose.

#### Green Stamp participants

The coordinator sends out information to members about the program and the requirements for certification<sup>60</sup>. The Regional Manager Paul Nieuwhof has undertaken 75% of the initial visits with Clinton, to assist in promoting the program. These visits would also be of some benefit to Association, with Green Stamp being seen as another service offered by the Association and the visits providing an opportunity to visit and talk to members.

While the coordinator of the MTA Green Stamp scheme prepares a report for the businesses visited, the coordinator for the printing and cleaning industries works through a checklist and then explains what is required to meet the criteria. He then arranges a follow-up meeting.

The assessments do not generate quantitative data regarding the business' performance however the coordinator has collected information on which contractors are being used to collect certain wastes and information on whether the business has spill kits, spill procedures, environmental policies etc and also on the changes that have been made as a result of Green Stamp. The data has not been collated but could be extracted<sup>61</sup>.

The printing industry scheme has targeted larger members because they have the potential to have the largest environmental impact and to influence others in the industry, however smaller businesses are also actively participating in the program.

Sixteen businesses have been accredited while another one has been previously accredited but has decided not to renew its accreditation<sup>62</sup>. Three businesses have achieved level 3 accreditation and another two are working towards moving from level 2 to level 3. One company, Scott Print, achieved Level 3 then went to ISO14000 certification.

Another fourteen businesses are very close to achieving accreditation. At this stage (late September 2006) thirty-five businesses have been visited and 75% have been assessed against the criteria. Four businesses have decided that they are not interested in the program.

Clinton is planning a trip to the Southwest in the next few weeks where several businesses have requested a visit to achieve accreditation.

While the expense of improvements to business operations to achieve legal compliance is not an issue for this industry and neither is the cost of accreditation, many businesses can't see any advantage in Green Stamp accreditation. However this is changing. One large trade printer which prints only for other printers, CJ King, was not interested until their printing industry customers

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<sup>60</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

<sup>61</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

<sup>62</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

started to demand it and they are now working towards accreditation. One of the reasons the printing business customers did demand it from the trade printer is that the Green Stamp coordinator has made it clear it will soon be a criterion for accreditation that outsourced work is also done by a Green Stamp accredited business<sup>63</sup>.

Most business make some change to achieve accreditation, usually improving their recycling, which translates into savings for the business.

One big impact can be achieved through companies encouraging their customers to return unused copies. It is common practice to print “overs”, a number of copies in excess of the order, as it is cheaper to do this than to risk being short of copies. One company was spending \$200,000 a year producing unrequired overs.

#### Stakeholder perceptions

The coordinator believes the Green Stamp program has greater credibility and is more readily accepted by the industries because it is seen as an industry association initiative and he has the support of Paul Nieuwhof when needed in making contact with businesses. Clinton is an employee of the industry associations but has regular contact, probably once a week or once a fortnight with Greg Allen, who has the advantage of knowledge of the program since its beginning.

The biggest issue with the program from the PIA's viewpoint is the uncertainty surrounding its continuation. “It is difficult to bring a good initiative to the industry if you are not sure it will be ongoing”<sup>64</sup>.

Customers, for example CALM (now DEC) and Local Governments, will not make changes to tender requirements unless there is some certainty that the program will continue, however the City of Subiaco has now set a valuable precedent as discussed below under the cleaning industry scheme.

The PIA believes the best way to build value for Green Stamp is through influencing customers to include it as a requirement. Large tenders should require either Level 3 Green Stamp certification or ISO14000 certification.

The expectation that Green Stamp certification will result in preferential treatment especially by government customers is certainly a motivation for businesses to participate in Green Stamp. Businesses are aware that the government sector expresses a desire to use environmentally friendly printers, but the experience in the marketplace seems to be that not many agencies are using this as a selection criterion and are not aware of the Green Stamp program<sup>65</sup>.

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<sup>63</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

<sup>64</sup> Paul Nieuwhof, Printing Industry Association, Personal communication.

<sup>65</sup> Angela and Andrew Yates, Printsmart, Personal communication.

There is a trend towards awarding tenders to print brokers who then subcontract to have the printing done as cheaply as possible. In fact, some tenders are only open to brokers. This results in most printing work being done offshore in China or in Singapore using Malay labour and paper sourced from uncertified sources.

Recently the Victorian Government outsourced all of its printing to one broker. The National Australia Bank specified that 50% of its printing be done offshore, however the requirement was removed after PIA members threatened to move their business to other banks.

As mentioned above the PIA has recognised the issue of outsourcing to another printer and is informing Green Stamp printers that they are required to use Green Stamp printers if they outsource. A Green Stamp participant also raised this issue<sup>66</sup>.

One participant suggested that the Green Stamp coordinator should undertake “spot” or unannounced inspections to ensure Green Stamp certified businesses are maintaining their standards, and that this would enhance the credibility of the program<sup>67</sup>.

There are other difficulties for the program caused by the lack of certainty. One of the most important is the turnover of staff who have no job security. There have been three or four staff already in the position of Green Stamp Coordinator for the Cleaning and Printing Industries and there have also been gaps of 3 and 6 months when there was no funding and no one in the role.

The PIA believes there is a customer expectation that members of the MTA and PIA will be Green Stamp certified, while members expect the association to provide information about recycling etc. The industry is beginning to take environmental issues seriously<sup>68</sup>.

The Green Stamp program also works with suppliers to encourage them to provide better products<sup>69</sup>. Some suppliers of bunding products, spill kits and flammable cupboards have begun to include the Green Stamp logo on their advertising brochures<sup>70</sup>.

The Printing Association would like to involve the Australian Graphic Design Association in Green Stamp. They have briefly discussed it but would need resources to progress. Designers often manage the whole job from design to printing and are in a position to inform and influence customers to make environmentally friendly decisions for example by providing green options:

- Paper from a certified source (Forestry Stewardship Council)
- Use of vegetable inks
- Allowing time or printing to dry (saving on solvents & energy)

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<sup>66</sup> Andrew Yates, Printsmart, Personal communication.

<sup>67</sup> Andrew Yates, Printsmart, Personal communication.

<sup>68</sup> Paul Nieuwhof, Printing Industry Association, Personal communication.

<sup>69</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

<sup>70</sup> For example, Spill Solutions, Bentley WA.

- Ordering only the number of copies actually needed.

For printers Green Stamp is mostly about Cleaner Production but if the designers could be involved and much larger impact could be achieved.

There are particular issues faced by the Label makers and Tags Association members, most of whom are also members of the PIA, for example, the substrate on which they print labels is their major waste product and is non-recyclable<sup>71</sup>. The PIA has been investigating possible recycling options.

### Building Service Contractors Association scheme

There are around 24,000 cleaners in WA, of which BSCAAWA Members employ approx 12,000. The cleaning industry is changing, with many more franchises of one or two individuals being established.

Companies in Cleaning Industry WA	No. BSCAAWA member companies
260 <sup>72</sup>	65
230 Carpet cleaners	30 Carpet Cleaners

Table 2: Breakdown of cleaning industry

### Funding

The cleaning industry's scheme has been in place since 2003.

The Building Services Contractors Association Australia (BSCAA) Green Stamp scheme was initially coordinated for four months on a part-time basis by the Swan-Canning Industry Project Coordinator<sup>73</sup>. The Swan Catchment Council and Department of Environment appointed a full-time coordinator for the Swan-Canning Industry Project in August 2003 due to a successful bid for Natural Heritage Trust Foundation Funding<sup>74</sup>.

In the first few months the project was scoped to ascertain its applicability to the cleaning services industry. This involved extensive liaison with representatives from the Master Cleaners Guild and the Motor Trade Association's Green Stamp Coordinator to determine objectives of the Green Stamp program, roles and responsibilities of the coordinator, an accreditation process, resources to be produced and techniques used to involve businesses. A baseline survey form was developed and ten cleaning businesses were visited to investigate current practices within the industry that

<sup>71</sup> Paul Nieuwhof, Printing Industry Association, Personal communication.

<sup>72</sup> Ian Westoby, Building Service Contractors Association of Australia, Personal communication.

<sup>73</sup> SWIS funding application, November 2004.

<sup>74</sup> SWIS funding application, November 2004.

pose a risk to the environment or do not comply with environmental law. The survey process identified the diversity of businesses involved in the cleaning services industry, the products used, chemical storage and use, spill management, wastewater disposal and solid waste management practices.

Draft Accreditation Criteria and supporting resources were developed based on the survey findings and consultation with industry representatives. The accreditation criteria have been designed as a tiered approach to environmental management to first bring businesses into compliance with environmental legislation, improve their environmental management practices and implement eco-efficiency. The Resource Kit has been designed to assist businesses achieve accreditation and includes a checklist or self audit, proforma for developing an environmental policy and management plan, an environmental products and services directory, and a series of industry specific information sheets on topics such as spill management procedures, wastewater management and important information for clients.

In 2004 funding was sought from the WMRF, as part of a joint application by the three schemes, for a full-time Green Stamp Coordinator to develop and implement a Green Stamp Environmental Accreditation Program for the cleaning services industry<sup>75</sup>. According to the application it was important to find an industry host for the coordinator rather than have this role located in the DoE.

It was suggested that the feasibility of establishing a coordinated schools recycling/waste management program involving the Wastewise schools program and Green Stamp should be investigated.

Interim funding for the period July 2004 to end 2004 provided 1FTE for the BSCAA Coordinator/Green Stamp Program Manager for 26 weeks (\$35,000). The scheme had about \$32,500 in funding for the year July 2005 – July 2006<sup>76</sup>.

#### Scheme focus and resources

The Green Stamp scheme focuses on several key areas considered essential to reducing the environmental impact of the cleaning industry, including:

- Storage practices associated with chemicals and other hazardous substances
- Wastewater disposal practices
- Spill management to prevent pollution of ground and stormwater systems
- Disposal of waste products preferably towards recycling or reuse
- Resource conservation including energy and water use

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<sup>75</sup> SWIS funding application, November 2004.

<sup>76</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

The scheme offers a range of resources and initiatives including:<sup>77</sup>

- Confidential environmental assessments
- Guidance notes
- Environmental product and service directories
- Environmental checklists for assessing client sites
- Environmental information and training seminars
- Introduction to Green Stamp Accreditation program
- Promotion of Green Stamp accredited businesses to potential clients

The website provides the criteria for certification for carpet cleaners or contract cleaners in the form of environmental action plans, as well as an environmental checklist designed to serve as an environmental assessment document to identify environmental impacts associated with general cleaning practices at this site.

The new pamphlets have been very well received by the industry. Ian Westoby thought businesses should pay the Association for the pamphlets but the coordinator wanted to supply them as part of the service unless a business requires very large numbers.

There are also eight Information sheets:

1. What information do I need to know and where do I find it?
2. Environmental laws
3. Wastewater management
4. Chemical management
5. Spill management procedures
6. Solid waste management
7. Water and Energy Efficiency
8. Drain Stencilling Guideline

The cleaning industry has only two levels of certification and this is unlikely to change. Due to the large number of cleaning products and suppliers it is unlikely that the scheme can be extended to suppliers.

Cleaning industry members pay fees for certification and re-certification based on their turnover.

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<sup>77</sup> <http://community.environment.wa.gov.au>

Company size	Certification fee (\$)	Recertification (annual)
Small (>1M)	99	55
Medium (1M-5M)	220	110
Large (> 5M)	440	220

Table 3: Schedule of certification fees

Fees for non-members are double those for members.

### Green Stamp participants

To date there are ten certified businesses of which two have been certified using the criteria for carpet cleaners: one is a carpet cleaner, the other a high-pressure cleaner. In addition, a further ten have been visited and it is expected another one of each category will be certified in the near future.

As these businesses contract services to other businesses the perceptions of the customer are often very important in the decision about whether to undertake Green Stamp accreditation. At least one new business is using Green Stamp as a marketing tool to win clients, with the existing clients referring other potential clients due to the certification. Clinton is visiting another seven businesses in the south-west in the next few weeks.

About 50% of cleaning businesses make changes to their operations in order to achieve legal compliance prior to certification, particularly in the areas of chemical storage and stormwater protection, while overall 90% of business would make some changes to achieve certification.

### Stakeholder perceptions

There is no one source of information in the Swan Trust, DEC, Water Corporation etc. to provide consistent advice and information about what the requirements are for businesses, for example regarding wastewater for carpet cleaners<sup>78</sup>. Through Green Stamp certification companies can be comfortable that they are compliant, an important motivation for participation. This places an expectation on the Green Stamp coordinator that the criteria will be up to date and relevant.

Many cleaning contracts are short-term so any market advantage is eagerly sought.

To counter the “value for money” criteria in tender specifications, which often results in simply the cheapest tender being awarded the job, there needs to be a preference for Green Stamp/other environmental accreditation<sup>79</sup>. For example the City of Subiaco included Green Stamp certification in the evaluation criteria in a recent Request for Tender for cleaning for a five year contract.

<sup>78</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

<sup>79</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

This was partly to counter the tendency for councils to choose the cheapest tender<sup>80</sup>. As there are "lots of cowboys" in the cleaning industry there is a real need for environmental criteria to be included in tender specifications. Including Green Stamp Certification as part of the evaluation criteria was useful in that it made contractors aware of Subiaco's environmental requirements and those businesses with environmental policies discussed them in the tender, however none of the businesses tendering actually had Green Stamp certification.

Most of the cleaners tendering were not even aware of the scheme, however this may be due to the newness of the scheme for the industry. The successful tenderer, Office Cleaning Experts, have quality assurance and environmental policies and might now seek Green Stamp certification.

Subiaco Council will continue to include Green Stamp certification in the evaluation criteria for cleaning tenders, however it is less likely they would require it for printing or mechanical services as these are usually obtained through quotes rather than tenders, being small jobs and different Council staff deal with these services. It was suggested that the Green Stamp program should be heavily promoted through WALGA to inform other local governments and have them alter their requests for tender. Jeff Jowett was unsure how he heard about Green Stamp, he thought it may have been through the BSCAA, however the BSCAA thought the Council must have learned about Green Stamp from another source. Perhaps it was a result of the green procurement conference mid-year.

Most Councils have an internal sustainability structure such as a committee and the scheme could aim to rise awareness within each local government through this committee.

The cleaning industry criteria emphasise the client and businesses are required to show how they will influence the behaviours of their clients. Cleaners can have an important role in influencing the practices of their clients, particularly through encouraging recycling. The Property Council WA, which manages 90% of the office buildings in WA, has stated that if the Green Stamp scheme had two to three years of certain continuity they would include a requirement for certification in every cleaning contract<sup>81</sup>.

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<sup>80</sup> Jeff Jowett, City of Subiaco, Personal communication.

<sup>81</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

### 3. The interrelations between the three industry sectors and opportunities for enhancement and expansion

The three Green Stamp schemes are based on the model developed by the MTA WA: face to face assessment against criteria for accreditation/certification, with the first level representing legal compliance being a prerequisite for progression to Green Stamp. The criteria have however been significantly adapted for each of the new industries, reflecting their different needs.

It seems that the MTA scheme has experienced greater difficulties due to the lack of legal compliance amongst automotive businesses because the improvements needed are much more expensive than improvements needed in cleaning or printing businesses.

The MTA scheme is also different in that the customer base is very wide and includes large numbers of private consumers as well as other businesses and government agencies, increasing the complexities involved in influencing the market to demand Green Stamp accreditation.

These differences can be seen partly through a comparison of the time and funding which has been required to achieve the existing participation levels. The comparison is not meant to imply that the MTA Green Stamp scheme has been less successful or a less productive use of funds than the other schemes as the MTA scheme funding has also been used to establish the overall program and the models and processes and on promotion, as well as in initiating the two new industry schemes and the local government initiative.

Scheme	Businesses Assessed	Participants	Funding	Life of scheme
MTA	160	48	\$299,084	1999 - 2006
PIA	35	16	\$63,515	2003 - 2006
BSCAA	20	10	\$67,500	2003 - 2006

Table 4: Funding of the Green Stamp program to date compared with participant numbers. This data is not complete for the PIA and BSCAA. The significant level of in-kind funding provided by the industry associations is not included in these figures.

It has been claimed that the success of the program cannot be measured by the number of accredited/certified businesses since this depends on a range of other factors such as green procurement purchasing by government and other major customers<sup>82</sup>, however the implications of this statement will be further examined later in this report. The success of a program must be measured against its objectives.

<sup>82</sup> SWIS funding application, November 2004.

It is recognised that a proper evaluation of the effectiveness of the program in achieving an improvement in environmental performance by the industries would include an independent assessment of the businesses that have been previously assessed for comparison with the original assessment undertaken by coordinators. There are copies of the original assessments on file in the association offices which could be used for this purpose. It is possible that many businesses have made changes as a result of the assessment even though they have decided for various reasons not to pursue accreditation. It is also possible that after discovering the costs of the changes required to meet legal requirements many businesses decided not to make any changes.

### **Other SME environmental improvement programs**

The resources developed by the Green Stamp program, with some initial input from the Centre of Excellence in Cleaner Production<sup>83</sup>, have been widely used by other stakeholders attempting to improve the environmental performance of SMEs in WA, including the Sustainable Production program at the South East Regional Centre for Urban Landcare (SERCUL)<sup>84</sup> and the Sustainable Production program being developed by the Swan Catchment Centre<sup>85</sup>.

The identification of the major barrier to Green Stamp accreditation in the automotive industry, the lack of incentives to achieve legal compliance due to poor regulatory enforcement, also led to the MTA Green Stamp scheme initiating work with local governments, in particular training them to undertake audits of workshops directly and assisting them through baseline surveys of industrial areas.

This work has led to the recognition that the most efficient means of improving environmental performance by SMEs is through the active participation of local government officers.

The SERCUL program uses this finding in its design, with about 266 businesses in several local government areas being surveyed by the SERCUL officer accompanied by a local government officer<sup>86</sup>. The local government officer makes the appointment to visit the business (which leads to a high level of participation) and the survey takes 40-50 minutes including an inspection of the premises. Information is provided to each business about the resources available to help them; their legal obligations and suppliers of services for example for waste management. A second follow up survey is undertaken several months later to determine what improvements have been made and what was useful in the information provided. The survey questions and resulting risk assessment are based on the Unauthorised Discharge Regulations and therefore focussed on preventing soil and water contamination. The SERCUL officer refers interested businesses in the relevant industries to Green Stamp.

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<sup>83</sup> Martin Taylor, Centre of Excellence in Cleaner Production, Personal communication.

<sup>84</sup> Paul Lock, SERCUL, Personal communication.

<sup>85</sup> Tony Soteriou, Swan Catchment Council, Personal communication.

<sup>86</sup> Paul Lock, SERCUL, Personal communication.

Unlike the Green Stamp program, which provides accreditation/certification to businesses for performance exceeding legal compliance, the SERCUL project aims only at increasing compliance.

The Sustainable Production program being initiated by the Swan Catchment Council also focuses on improving SME compliance with environmental protection legislation in order to protect the Swan Catchment. The project uses audit-risk assessment tools, based on the Green Stamp criteria, on a pocket PC. National Heritage Trust funding will be used to fund four local government officers who will conduct audits of SMEs. The audit does not cover waste generation. A major focus of the program is training local government officers and providing them with the PCs and software (for a fee) to undertake field assessments which are then fed into a central database. The company manning the database can then generate automatic reports and non-compliance notices for issue to businesses.

The Centre of Excellence for Cleaner Production has run projects aimed at SMEs, and has produced case studies, for example for the dry-cleaning industry and automotive businesses<sup>87</sup>. The Centre has found working with SMEs to be very resource intensive and that only a small number of companies could be assisted for quite a large investment. The Centre is clearly focussed on assisting businesses to achieve cleaner production and eco-efficiency on the path to sustainable development and does not focus on legal compliance issues.

There are other projects in WA which focus on particular aspects of SME environmental performance. Amcor has a "Recycling at Work Program" funded by the Waste Management Board, which aims to increase recycling of paper, cardboard, glass, metals, timber and plastics from SMEs<sup>88</sup>.

There are obvious synergies between the work of these different SME programs which should provide opportunities for cross-promotion and referrals as well as the sharing of ideas and resources already occurring to some extent.

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<sup>87</sup> Martin Taylor, Centre of Excellence in Cleaner Production, Personal communication.

<sup>88</sup> Jamie Young, Amcor, Personal communication.

## Stakeholder analysis of the Green Stamp schemes

Role	MTA Scheme	PIA Scheme	BSCAA Scheme
Participating business	Dealerships Mechanical repairers Body repairers Vehicle rental businesses Small businesses to chains	Printers	Carpet cleaners Contract cleaners
Customers	General public/community (large numbers) Local government State government Businesses	General public/community (small numbers) Local government State government Businesses	General public/community (large numbers) Local government State Government Businesses
Suppliers	Recycling services eg Amcor	Recycling services eg Amcor	Recycling services eg Amcor
Funding providers	Local Government State Government (WMB currently, other agencies potentially) Federal Government (potentially)	Local Government State Government (WMB currently, other agencies potentially) Federal Government (potentially)	Local Government State Government (WMB currently, other agencies potentially) Federal Government (potentially)
Regulatory Enforcement	Local government State government	Local government State government	Local government State government
Collaborators (help promote Green Stamp)	Participants Customers Suppliers eg Amcor Local government State government Federal government Catchment Groups/ Urban landcare groups Ribbons of Blue program	Participants Customers Suppliers eg Amcor Local government State government Federal government Catchment Groups/ Urban landcare groups Ribbons of Blue program	Participants Customers Suppliers eg Amcor Local government State government Federal government Catchment Groups/ Urban landcare groups Ribbons of Blue program
Funding competitors	Catchment Groups/ Urban landcare groups	Catchment Groups/ Urban landcare groups	Catchment Groups/ Urban landcare groups
Users of Green Stamp Resources	Participants Potential new industry sectors Local government State government Federal government Catchment Groups/ Urban landcare groups	Participants Potential new industry sectors Local government State government Federal government Catchment Groups/ Urban landcare groups	Participants Potential new industry sectors Local government State government Federal government Catchment Groups/ Urban landcare groups

Table 5: Stakeholder analysis

### Opportunities for resource sharing

The stakeholder analysis shows that while the automotive scheme has a greater need for enforcement support and different challenges in influencing customers, all three schemes have a

need to influence the same stakeholders and there are significant opportunities for resource sharing.

Some of the customers, notably large businesses and local and State Government agencies are potential customers of all three industries.

Recently Clinton Scott and Natalie Sharp attended a national Green Purchasing Conference hosted by WALGA<sup>89</sup> and it was possible to promote all three of the Green Stamp schemes to some of these customers, in a formal presentation by Clinton and through an information stall. Two Green Stamp businesses, a printer and a cleaner, also presented at the conference on their environmental management including Green Stamp. The Conference was attended by 150-200 delegates including local government purchasing officers, Western Power, Alinta Gas and a representative of the International Green Purchasing Network.

Similarly many other stakeholders, including potential funders such as the Sustainable Energy Development Office (SEDO), the Water Corporation and the Department of Environment and Conservation are also common to all three schemes. Stakeholders involved in enforcement, such as local and State Government agencies are common to all three.

The relationship of each of the schemes to the other SME programs trying to improve the environmental performance of SMEs is also shared. The stakeholders who can both help to promote Green Stamp and make use of its resources include several State Government agencies such as the SEDO, the Small Business Development Corporation (SBDC), the Water Protection Branch of the Department of Water, Waste Management, Air Quality Management, Enforcement and Communication Branches of DEC, and WorkSafe (particularly for chemical handling),

Attempts to influence business and government customers to favour Green Stamp businesses in procurement decisions and to obtain funding as well as working in a complementary way with other programs targeted at SMEs are likely to benefit from a coordinated approach, otherwise the schemes may find they are competing with each other for funds and stakeholder attention.

The printing and cleaning industries coordinator has also found there are some administrative efficiencies in having one person in the role for two industries, for example brochures and letters prepared for a mail-out can be adapted to the other industry<sup>90</sup>.

### **Opportunities for expansion of the program**

The vision of the Green Stamp program is to become the “primary point of contact for Western Australia’s 185,000 SMEs, providing sector specific information and resources tailored to their individual needs”<sup>91</sup>.

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<sup>89</sup> Third National Buying Green Conference and Exhibition, 25-26 May 2006.

<sup>90</sup> Clinton Scott, Green Stamp Coordinator Cleaning and Printing Industries, Personal communication.

This is obviously a very ambitious aim given the number of businesses and the diversity of industries involved.

There is little doubt that the Green Stamp concept is appealing to industry associations who see the on-the-ground method of delivery coupled with incentives as the most effective way to influence their SME members while also potentially befitting the association in terms of access to the service being an added benefit of membership.

In addition to the related industry sectors suggested by the MTA and PIA, it was suggested that other industry groups including the Nursery and Garden Industry Association and the Lawn Mowing Contractors Association have shown interest in using the Green Stamp model to address their environmental responsibilities<sup>92</sup>.

It was not possible to confirm the interest of the Lawn Mowing Contractors Association. The telephone contact for the Association has not heard of Green Stamp and said the Association would not meet again until January 2007 so he could not discuss the issue with the President<sup>93</sup>.

The Nursery and Garden Industry Association has its own accreditation schemes for wholesalers and retailers, which address beyond compliance environmental issues and the Association would not be interested in adopting Green Stamp<sup>94</sup>.

However with the appropriate resources and suitable industry association commitment, the Green Stamp program could be tailored to address the environmental issues of many other SME industries including, but not limited to, metal finishing, chemical blenders, plastic processing, dry cleaners and furniture manufacturers<sup>95</sup>.

This expansion cannot however be considered until the progress of the existing schemes has been consolidated and there is an overall strategy for sustained funding and growth.

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<sup>91</sup> SWIS funding application, November 2004.

<sup>92</sup> SWIS funding application, November 2004.

<sup>93</sup> Chris Quinn, Lawn Mowing Contractors Association, Personal communication.

<sup>94</sup> John Burnside, Nursery and Garden Industry Association, Personal communication.

<sup>95</sup> SWIS funding application, November 2004.

## 4. The waste related aspects of the schemes

The Waste Management and Recycling Fund has provided most of the funding to date for the Green Stamp program. This fund is obtained through the landfill levy and is hypothecated for funding waste management and reduction programs. While many aspects of the Green Stamp program relate to waste reduction and management in the broader sense, several of the objectives such as air quality management and emergency spill management are less closely related to the objectives of the fund and the Board's Strategic Direction for Waste Management in WA.

### Assessment of program emphasis

To determine the relative emphasis on different environmental aspects in each of the schemes the criteria were assigned to one of six categories of environmental issues. The categories chosen are very close to the six categories covered in the Environmental Management Plan format provided by the MTA<sup>96</sup>. In some cases this was relatively straightforward as the assessment criteria are divided into sections relating to the different environmental aspects. Criteria which are general, for example the requirement to prepare and use an environmental management plan were not included as they would have been added to each category and thus cancelled each other out. The Contract Cleaners' criteria emphasises the importance of influencing clients and includes the requirement that:

- The cleaning business has undertaken an environmental assessment\* of all client sites as they relate to cleaning practices and has on record the results, issues identified and remedial practices incorporated as agreed by client. The impact assessment is undertaken every 6 – 12 months and addresses issues including but not limited to;
  - wastewater management
  - chemical use and handling
  - spill management
  - solid and liquid waste disposal
  - employee (cleaners) training and awareness
  - simple energy efficiency issues related to the site.

This criterion was not included as it also covers most of the environmental categories.

Procurement was not included as a category as there are no criteria in any scheme specifically relating to this issue. The Product and Services directory for each scheme encourages recycling

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<sup>96</sup> Monitoring and Managing Environmental Impacts, A simple Environmental Management Plan for Body Repairers, MTA WA.

and the use of environmentally friendly products but these do not translate into requirements for accreditation/certification.

The full analysis is shown at Appendix B.

The summary table below shows the outcome of this analysis.

Environmental issue	Solid waste (No. criteria) % criteria	Liquid waste (No. criteria) % criteria	Air Quality (No. criteria) % criteria	Wastewater Management (No. criteria) % criteria	Chemical use & handling/ spill management (No. criteria) % criteria	Energy conservation (No. criteria) % criteria
MTA Scheme Mechanical Repairers	(7) 16%	(2) 4.6%	(7) 16%	(15) 34.8%	(9) 20.9%	(3) 6.9%
MTA Scheme Body Repairers	(7) 14%	(4) 8%	(13) 26%	(15) 30%	(10) 20%	(4) 8%
PIA Scheme	(10) 58.8%	-	(1) 5.8%	(3) 17.6%	(1) 5.8%	(2) 11.7%
BSCAA Scheme Contract Cleaners	(1) 7.1%	(1) 7.1%	-	(3) 21.4%	(8) 57.1%	(1) 1%
BSCAA Scheme Carpet Cleaners	(1) 6.25%	(1) 6.25%	-	(4) 25%	(9) 56.25%	(1) 6.25%
Total for program	(18) 13.3%	(8) 5.9%	(21) 15.5%	(40) 29.6%	(37) 27.4%	(11) 8.1%

Table 6: Assessment of program emphasis

As would be expected the environmental issues which are emphasised by each industry scheme are those areas most at risk of adverse impact due to the activities of that sector.

Wastewater management is an important issue for all of the schemes as all of the industries have the potential to contaminate storm water and therefore streams and rivers through careless management of water leaving the premises. The chemical handling and spill management areas are closely related to wastewater management as most of these criteria are aimed at preventing contamination of drains leading to waterways. Most of the environmental regulations relevant to these industries concern wastewater and spill management.

Solid waste management is most important for the printing industry scheme as this industry has the potential to generate large volumes of waste paper, and it is also reasonably important for the automotive industry but is not really an issue for cleaners.

**Potential funding sources and partners**

The different weightings evident for different environmental concerns can be used to assist in identifying potential funding sources and partners for the schemes.

Issue	Potential funder
Solid waste	Waste Management Board Local Governments
Liquid waste	Swan River Trust Water Source Protection Branch, Department of Water Local Governments Natural Heritage Trust (Federal)
Air quality	Air Quality Management Branch DEC Natural Heritage Trust (Federal)
Wastewater management	Department of Water, Water Corporation Local Governments Natural Heritage Trust (Federal)
Chemical use & handling/spill management	WorkSafe (Department of Consumer and Employment Protection) Land and Water Quality Branch of DEC
Energy conservation	SEDO DEC (Implementation of WA Greenhouse Strategy)

Table 7: Potential funding providers/partners

All three industry associations involved in Green Stamp are contributing in terms of administration, promotion, office space and equipment. The associations do not have further resources to contribute the program. There is an often-held perception that industry associations have funds they can draw on for programs however the reality is that membership of most industry associations has been steadily declining and it is very difficult to increase member fees without losing members. At the same time members expect a wide range of services in return for their membership fees.

In addition to the Waste Management Branch, several areas of the DEC benefit from the Green Stamp program and closer partnerships, both for funding support and in-kind support should be developed. For example, the Air Quality Management Branch of the DEC has a project in partnership with the Swan Catchment Council, with funding from the Natural Heritage Trust: the Small to Medium Enterprise Air Emission Monitoring Project, under Initiative 11 of the Perth Air

Quality Management Plan (AQMP) which addresses the issue of Cleaner Production, specifically for SMEs. The primary concern is volatile organic compounds (VOCs) emitted by automotive service businesses (spray painters and panel beaters), industrial degreasers, welders and drycleaners. The project is using passive samplers to collect VOCs. There may be an opportunity following the conclusion of this monitoring project to access funds to reduce the VOC emissions from these industries which would benefit the MTA WA scheme.

The Sustainable Energy Development Office (SEDO)<sup>97</sup> provides grants to businesses and community groups working to reduce greenhouse gas emissions through improving energy efficiency. Most of their business grants appear to apply to offices but there may be possibilities in developing a funding partnership with SEDO. Even if funding is not available it would be of value to both organisations for SEDO to be able to provide information about Green Stamp to businesses, both in the Green Stamp industries and potential customers of the Green Stamp scheme industries.

Similarly, the Small Business Development Corporation (SBDC)<sup>98</sup>, if unable to assist with funding should be able to help promote Green Stamp through its service of providing information to small businesses.

WorkSafe funding to improve occupational health and safety in the automotive industry is already being accessed by the MTA WA. While this funding may provide the opportunity to combine Green Stamp audits with safety audits the chemical handling aspects of all three schemes are also potentially of interest to WorkSafe and may be worth exploring for some part funding of the program.

There is also the possibility of some local government funding for the program. While coordinator of Green Stamp for the MTA, Cameron McPhee did a survey of environmental practices of automotive businesses in the City of Joondalup<sup>99</sup>. The City of Joondalup's Sustainable Community Funding Program funded this survey. The project aimed to foster greater business understanding and awareness of issues of environmental concern, and encourage further industry uptake of environmental best practice initiatives.

The project focused on a range of issues including regulatory compliance, sound waste management practices, safe storage and containment of hazardous substances, wastewater pre-

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<sup>97</sup> <http://www1.sedo.energy.wa.gov.au>

<sup>98</sup> [www.sbdc.com.au](http://www.sbdc.com.au)

<sup>99</sup> Survey of the Environmental Practices of Automotive Businesses in the City of Joondalup December 2005, Cameron McPhee, Motor Trade Association of Western Australia.

treatment and disposal, resource conservation, air quality and a range of other environmental management considerations.

Opportunities for funding could be enhanced through considering the needs of the potential funders identified above.

It is often assumed that the objectives of the Waste Management Board relate primarily to the diversion of solid waste from landfill as its funds are derived from the landfill levy. However the role of the Waste Management Board is to facilitate the transition Towards Zero Waste in Western Australia by developing and implementing policies and programs to reduce waste and support recycling<sup>100</sup>. The Board's primary objective is "making significant and sustained progress in reducing waste across government, business and industry, and the community".

The Board's Statement of Strategic Direction for Waste Management in Western Australia<sup>101</sup> "states that the strategic approach adopted by the Government is to promote a shift away from solely focusing on reducing the amount of waste disposed to landfill towards the management of the whole lifecycle of every product and its waste, from creation to disposal".

Green procurement activities are specifically mentioned as a priority, as are financial and non-financial partnerships with business and industry to strengthen "our joint effort to reduce waste"<sup>102</sup>.

The draft Waste Avoidance and Resource Recovery Bill defines waste as including liquid, solid, gaseous or radioactive, whether useful or useless, which is discharged into the environment and one of the functions of the proposed Waste Authority is to promote resource efficiency, waste avoidance and resource recovery.

### **Measurement of program impacts**

Regardless of whether the Waste Management Board (or the proposed new Authority) reads its objectives as wider than reducing solid waste to landfill, the Green Stamp program clearly needs to improve its measurement of outcomes.

The 2004 Green Stamp funding application states the level of success of the program can be measured through the level of change in those businesses participating in the program over 1 to 3 years. However there seems to be no way of extracting this information other than by conducting costly surveys.

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<sup>100</sup> Waste Management Board Business Plan and Budget, 2006-07

<sup>101</sup> Statement of Strategic Direction for Waste Management in Western Australia, Waste Management Board, September 2004.

<sup>102</sup> Statement of Strategic Direction for Waste Management in Western Australia, Waste Management Board, September 2004.

The funding application also states that key performance indicators for the Green Stamp program will include:

- Proportion/volume and type of products reused or recycled externally as a result of Green Stamp intervention;
- Proportion/volume and type of products reused or recycled in-house as a result of Green Stamp intervention;
- Proportion/volume and type of waste reduced or removed from production process(es) but not allowing for replacement with a less problematic waste) as a result of Green Stamp intervention;
- Proportion of businesses properly managing liquid wastes (including process waste waters and chemicals) as a result of Green Stamp intervention;
- Proportion of SMEs with suitable environmental risk management strategies, procedures and infrastructure as a result of Green Stamp intervention; and
- Proportion of local government agencies assisting SMEs as a result of Green Stamp intervention.

The assessment criteria allow extraction of data to cover the proportion of business properly managing liquid wastes and/ or with suitable risk management strategies, procedures and infrastructure, however there is no way of extracting information for any of the other proposed performance indicators.

The self-assessment and the format for Environmental Management Plans for the MTA green Stamp scheme<sup>103</sup> includes the prompt below to encourage businesses to consider the cost of recycling compared with the cost of landfill, however it is an optional tool and not necessarily used or collected by the Green Stamp coordinator. It does not provide a breakdown of waste produced.

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<sup>103</sup> MTA WA Green Stamp Program Environmental Self- assessment for Mechanical Repairers.

**Waste to Landfill**

How much recyclable or reusable product do you send off to landfill and at what cost? Do the following calculations based on your current practices.

How do you store your general waste?

Wheelie bin - No. of bins \_\_\_\_\_ x 0.24 m<sup>3</sup> (240L capacity) = \_\_\_\_\_ m<sup>3</sup>

Waste skip - No. of skips \_\_\_\_\_ x capacity \_\_\_\_\_ m<sup>3</sup> = \_\_\_\_\_ m<sup>3</sup>

Other \_\_\_\_\_ - No. of: \_\_\_\_\_ x Size \_\_\_\_\_ m<sup>3</sup> = \_\_\_\_\_ m<sup>3</sup>

TOTAL (a) \_\_\_\_\_ m<sup>3</sup>

How many times per year is it emptied? (b) \_\_\_\_\_

How full is it when emptied?(c)

50 – 70% = (0.60)     71 – 90% = (0.80)     91 – 100% = (0.95)     >100% = (1.05)

To calculate approximately how much waste your business is sending to landfill per annum:

[Add the total of (a)'s] x (b) x (c) = \_\_\_\_\_ m<sup>3</sup> / year

What is the annual cost to have it / them emptied? \_\_\_\_\_

Now identify the products that you are currently sending to landfill that could be redirected to recycling or reuse at a lesser cost.

If those products constitute just 30% of your weekly waste you could significantly reduce your disposal bill and the quantity of waste going to landfill.

Each scheme has a product and services directory to assist businesses locate recycling services and environmentally friendly products and this is probably useful in encouraging business to recycle, particularly products for which there is a payment.

The Environmental checklist for cleaners also asks where the different solid wastes go, into general waste or recycling, but again this is an optional tool for site use and does not collect data on types or volumes of wastes.

A recent study partly funded by the Waste Management Board examined the waste generated by SMEs in the Bellevue industrial area<sup>104</sup>. Of the businesses surveyed in the area, 24% provide motor vehicle services. One of the survey questions related to waste management, asking what types and approximate volume of waste is produced and disposed of by the business each week. The study found that 3,288 litres of waste oil are produced in this area each week, presumably mostly by these motor vehicle service businesses, a very significant volume. Unfortunately the study did not provide a breakdown of waste types against business categories so it is not possible to determine the volumes of different types of solid wastes produced by motor vehicle businesses.

The inclusion of this type of simple question in the accreditation criteria for each of the Green Stamp schemes would provide the opportunity to collate valuable data from the program. This data should be collected from all businesses assessed, including those that do not achieve accreditation/certification. Yearly re-accreditation would provide data to measure improvements if any in waste generation.

<sup>104</sup> Interim Report, Bellevue Sustainable Industry Project, Small & Medium Enterprise Research Centre Edith Cowan University and the Swan Catchment Council, May 2006.

A recent grant application<sup>105</sup> included a request for funds to identify the status of recycling and reuse of empty liquid packaging by automotive businesses, collect quantitative data on the volumes and types of these containers going to landfill, identify drum and collection services, barriers to recycling and recommend interventions to increase the rate of recycling. This waste reduction scoping project was not funded, but this is the type of information that could be collected as part of routine assessments.

Information about the volumes of liquid wastes produced and savings achieved on energy bills would also be useful in determining the impacts of Green Stamp and would assist in obtaining funding or the existing program and expansion into other industries.

The cleaning industry certification requires that both contract and carpet cleaners have “identified a set of specific objectives and targets (minimum of 5) that they will aim to achieve over the next 12 months”<sup>106</sup>.

Some collation of the objectives chosen and reporting on the level of achievement against these objectives would be useful in measuring the extent of change achieved by Green Stamp participants.

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<sup>105</sup> Major Milestones for 2<sup>nd</sup> Extension of Contract GCP/01/03.

<sup>106</sup> Environmental Action Plan, Certification for Carpet Cleaners BSCAA.

## 5. Recommendations for the drafting of a business case for the program

The brief for this review included a requirement to develop recommendations and assistance to the schemes for the drafting of a business case for progressing the program, including the development of Zero Waste Plans and the identification of ongoing funding opportunities to support the schemes from July 2007.

### Objectives of the Green Stamp program

Before developing a business plan for the future of the program it is critical to clearly define the objectives of Green Stamp, so that the strategy developed will help to achieve the appropriate outcomes.

As noted before there is confusion amongst stakeholders, including the industry associations, participating businesses, funding providers and other external stakeholders about the aims of the Green Stamp program.

The objectives are clearly stated on all the Green Stamp literature with slight variations.

Statements include:

Green Stamp:

- aims to “develop a fair and equitable environmental accreditation for the automotive trades”, encouraging automotive businesses to comply with environmental laws and rewarding those that have gone beyond their legislative requirements.
- One of the Green Stamp’s objectives is [...] showing consumers that many workshops are including environmental considerations in their operations. The Green Stamp Accreditation is therefore a marketing tool for automotive businesses to prove to their customers their commitment to good environmental management. It aims to educate the consumer and appeal to their environmental conscience, encouraging them to utilise the services of a Green Stamped Accredited business<sup>107</sup>.
- “is an environmental initiative developed by the Building Service Contractors Association of Australia (WA) in conjunction with the Department of Environment. It aims to assist businesses in the cleaning industry to achieve environmental best practice in a cost effective, efficient manner. Green Stamp works with businesses to identify the practices

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<sup>107</sup> Accreditation criteria, Mechanical Repairers, Green Stamp program, MTA WA.

that pose a risk to the environment, then offers assistance and advice to business owners and managers on how to best manage those issues.”<sup>108</sup>

- “is an environmental initiative developed by the Printing Industries Association of Australia (WA) in conjunction with the Western Australian Department of Environment. The program assists small to medium businesses to incorporate processes and practices that avoid, reduce, reuse, recycle and dispose of their wastes in an environmentally sensitive manner.”<sup>109</sup>
- “works to promote those who go beyond legislative requirements and implement industry best practice initiatives and systems. Green Stamp Certification is a means for businesses to demonstrate their green credentials to customers and to appeal to their environmental conscience, encouraging them to utilise the services of Green Stamp Certified Cleaners to meet their cleaning needs.”

It is reasonably clear from the above statements and from the original design of the program that Green Stamp is intended to provide recognition to SMEs that progress past legal compliance towards best practice and to reward them through increased business.

The discovery that many businesses in the automotive industry who are interested in attaining Green Stamp accreditation are unable to do so due to failure to meet the compliance criteria has led to the development of the local government initiative within Green Stamp and a much greater emphasis on assisting businesses to understand their legal obligations and to encourage them to make the necessary improvements to their workshops. This has led to the diversion of resources from promoting the program to customers and building the brand value of Green Stamp. It has also resulted in substantial resources being used to assess businesses that are unlikely to achieve Green Stamp accreditation.

Much of the criticism of the program by various stakeholders relates to what they see as a failure by Green Stamp to improve compliance and thus lessen the impact of the industries at this basic level.

For example, the criticism that there is too much overlap between Green Stamp and the SERCUL/Swan Catchment Centre programs<sup>110</sup> (which are using the resources and local government approach pioneered by Green Stamp) reflects the fact that Green Stamp has been attempting to work in the same segment: those business which are not legally compliant.

This overlap means the criticism that the Green Stamp is a much too “scattergun” approach as it does not cover all the businesses in a given industrial area<sup>111</sup>, is valid as the broader industrial

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<sup>108</sup> Building Services Contractors Association of Australia (WA), Environmental Action Plan, Certification for Carpet Cleaners.

<sup>109</sup> The Green Stamp Baseline Assessment for Printing Businesses.

<sup>110</sup> Jamie Young, Amcor, Personal communication

<sup>111</sup> Tony Soteriou, Swan Catchment Council, Personal communication.

area approach by local government is likely to be more efficient when attempting to enforce compliance with legal requirements. The observation that Green Stamp often “preaches to the converted” is accurate and this is actually where the Green Stamp program should be focused if it is to meet its objectives.

The aim of an ecolabel such as Green Stamp is to reward those businesses that are already legally compliant and that are willing to go beyond this point to implement elements of best practice and implement cleaner production, waste avoidance and resource recovery activities and eco-efficiency initiatives. The program should have positive measurable effects on the impacts of the businesses.

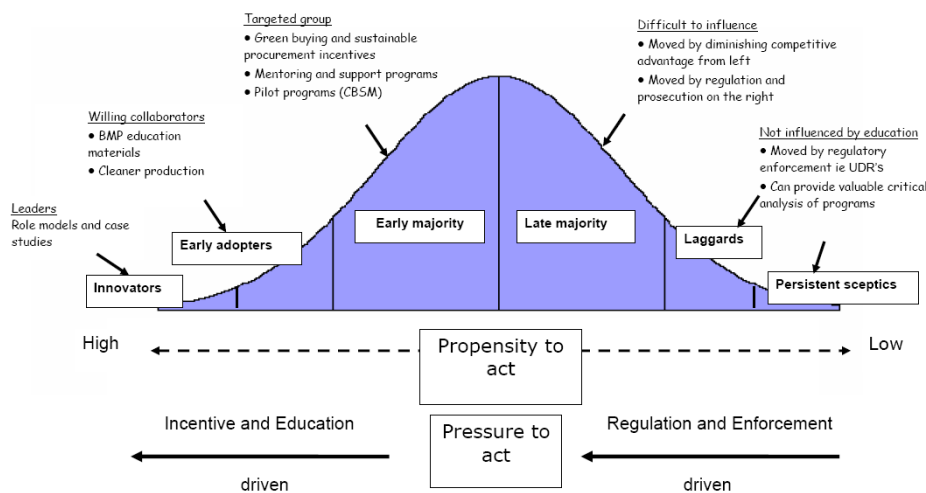
Customers who are concerned about the environment, when informed about the availability of services from such businesses should prefer to purchase from these businesses over those that have not achieved accreditation and therefore reward the accredited/certified businesses.

The success of the accredited businesses should establish a virtuous cycle whereby other businesses are encouraged to achieve accreditation and improve their environmental performance.

However as seen in the model below it is unlikely that the “laggards” in the industry, those who are performing far below legal compliance, will be motivated to improve to the level of accreditation. Indeed these businesses are unlikely to improve to the compliance level without the threat of enforcement.

The diagram shows the role of the different SME programs in diffusing the “innovation” of improving environmental performance. This diagram was kindly provided by Paul Lock at SERCUL.

## The Diffusion of Innovations An approach towards SME sustainability



Adapted from E.M. Rodgers (1995) *The Diffusion of Innovations*. 4<sup>th</sup> ed. The Free Press, New York and L. Robinson (2004) *Enabling change*. Environs Australia.

It should be noted that the curve is actually unlikely to represent a normal, bell-shape but for most SME industries is likely to be significantly skewed to the right<sup>112</sup>.

According to this model the Centre of Excellence in Cleaner Production addresses the innovators and early adopters segments of SME industries, the SERCUL and Swan Catchment Centre programs address the groups to the right of the curve which are motivated by the prospect of regulatory enforcement and the Green Stamp program targets the early adopters/early majority who are motivated by the prospect of competitive or marketing advantages.

As discussed, there is a lack of regulatory enforcement which has hindered the movement of businesses from the right of the curve into the potential Green Stamp segment, particularly in the case of automotive businesses where the costs of achieving legal compliance are significant. This issue has been identified and is beginning to be addressed through involvement of local governments in the enforcement role, though this is still a very under-resourced area for most local governments.

However it can be clearly seen from this diagram that the Green Stamp segment is motivated by incentives including the prospect of preferential purchasing under green procurement programs. Green Stamp accreditation should be a marketing tool and the availability of incentives and rewards for participants is critical to its uptake and ongoing success.

This diagram also suggests that since potential Green Stamp participants are more likely to be influenced by incentives than by disincentives such as prosecution, it may be more productive to focus scarce program resources on achieving these incentives rather than on trying to improve enforcement, which is the approach learnt from Green Stamp and now being applied by the SERCUL and Swan Catchment projects which do target the segments influenced by enforcement.

There may be value in the MTA continuing to run a compliance program for businesses that require assistance and encouragement to achieve compliance, especially as these business are likely to be having a cumulatively large negative impact on the environment, however this program should be funded and managed separately to Green Stamp.

The continuation of this effort should also be examined in terms of partnerships and collaboration with the other programs operating in that area; the SERCUL and Swan Catchment Centre programs.

The Department of Conservation and Environment should consider ways of recognising and funding the extensive work undertaken by the MTA to assist businesses achieve compliance with regulatory requirements.

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<sup>112</sup> Beth Walker, Edith Cowan University, Personal communication.

SWOT analysis

<p style="text-align: center;"><b>Strengths</b></p> <p>Excellent resources (audit criteria, EMPs, brochures etc)          Brand name recognition          Industry association commitment          Participant commitment</p>	<p style="text-align: center;"><b>Weaknesses</b></p> <p>Lack of clear objectives &amp; strategy          Poor data collection/measurement          No evaluation          Lack of overall program coordination          Weak partnerships with key stakeholders          Poor commitment by some stakeholders (e.g. DEC)</p>
<p style="text-align: center;"><b>Opportunities</b></p> <p>Growing consumer interest in Buying Green          Opportunity to influence procurement decisions          Improved partnerships, e.g. with the Communications Branch DEC          Possible advertising by participants          New funding prospects</p>	<p style="text-align: center;"><b>Threats</b></p> <p>Large number of customers to influence (particularly MTA)          Uncertainty regarding funding          Seen by potential funders as a DEC program          Competition from other providers          Potential conflict of interest between GS &amp; associations</p>

Table 8: Analysis of Strengths, Weaknesses, Opportunities and Threats

The lack of government enforcement is a major issue in the area of improving environmental performance by SMEs, however it is not listed as a threat to Green Stamp because, as discussed above, Green Stamp is not a compliance program and the Green Stamp approach cannot effectively target compliance issues.

The focus for Green Stamp should be consolidating the progress made to date, particularly through delivering some rewards to the current Green Stamp participants. This should create incentives for more businesses to become certified/accredited and start to pull more of those in the early majority and perhaps eventually, late majority segments over towards the left-hand side of the bell curve.

Naturally businesses that are performing well above the legal compliance level will desire a more level playing field as they are spending considerably more on environmental management than are the majority who are not even legally compliant. This can be addressed through local government initiatives such as the SERCUL and Swan Catchments programs and by the MTA and others, however this work should be outside the Green Stamp program. The increased incentives for these businesses will also compensate for this imbalance.

Strengths

One of the most valuable outcomes of the Green Stamp program to date has been the development of easy to use accessible resources such as the assessment criteria, formats for

Environmental Improvement Plans and brochures for customers. Although it is not possible to quantify the value of these resources, their widespread use by other programs confirms their usefulness.

Green Stamp has been established as a recognisable “brand” though there is still great deal of work to do in broadening this recognition and particularly in deepening understanding of what the brand means.

The industry associations involved are strongly committed to the program and prepared to contribute substantial in-kind support in terms of managerial support, office space and resources, administration and promotion.

Green Stamped businesses are committed to the program and in some cases in the MTA scheme they have maintained this commitment over a number of years. There appears to be a high level of interest in the industries in achieving Green Stamp accreditation/certification.

#### Weaknesses

The greatest weakness of the program is the lack of clear objectives and a strategy for achieving these objectives. Successive program funding applications have proposed a range of activities and actions to be funded without an overall picture of how these activities would help to achieve Green Stamp’s goals.

Green Stamp is a marketing tool yet surprisingly little of the program’s resources have been used for marketing or related activities such as achieving preferential purchasing from Green Stamp businesses. Promotional budgets have been spent on items of doubtful effectiveness, for example radio advertising and the production of promotional items such as key rings and refrigerator magnets.

Similarly the outcomes of the program are very difficult to measure as there has been no thought given to data collection or evaluation in the design of the program. Measurement and data collection needs to be closely related to the objectives of the program and should satisfy the needs of key stakeholders, particularly funding providers.

Green Stamp is more than the sum of the three existing schemes and it requires overall coordination and planning to ensure its continued growth and success. It seems that some of the drive and cohesion of the program was lost when uncertainty regarding funding led to a turnover of staff coordinating the schemes and particularly when the program’s originator, Bernie Riegler, left the position of program manager. Without a program manager there is no-one to undertake strategic planning for the program as a whole.

There are very weak and/or non-existent partnerships with some key stakeholders, including a range of State Government agencies such as the SBDC, SEDO and the Water Corporation and the

WA Local Government Association. Some of these stakeholders are potential funders but all are able to benefit from Green Stamp and assist in promoting the advantages of purchasing from Green Stamp businesses.

The most concerning weakness is probably the apparent lack of commitment by the DEC, in particular the Waste Management Branch and the Community Education Branch. Externally Green Stamp is often seen as a Departmental program which may be a barrier to accessing funding from other agencies, but the program receives very little guidance or assistance from the DEC. The Green Stamp web site is hosted by the DEC which creates issues for updating the site as well as obtaining feedback and inquiries made through the site as there are perceived walls between the Department and the industry associations.

The Department's communication and education strategy should include the Green Stamp program.

### Opportunities

There appears to be increasing interest in green procurement issues particularly from a local government perspective. The inclusion of Green Stamp certification as a selection criterion in the recent Subiaco Council cleaning tender is a breakthrough that should be built on and publicised.

A study of how local governments might be influenced to change their procurement practices and which recognised the value of Green Stamp accreditation in choosing service providers has recently been undertaken<sup>113</sup>.

The WA Local Government Association (WALGA) is very interested in taking a leadership role for green purchasing and is attempting to change the cultures of local councils to encourage the integration of environmental considerations into purchasing criteria. A resolution of the Buying Green Conference<sup>114</sup> (convened by Peter Hoare) was to develop a proposal to the Minister for Environment for funding to assist in developing green procurement. The funding request would provide at least two staff to work with local governments, but an alternative proposal provided at the same time is for a larger budget for WALGA to lead a coordinated approach with State agencies as well as local governments. WALGA is awaiting the outcome of this funding request<sup>115</sup>.

Consumers are also becoming gradually more aware of the availability of "green" purchasing options for many products and services.

The Waste Management Board's Business Plan for 2006-07<sup>116</sup> lists "Working with the Department of Treasury and Finance on development of procurement policies that facilitate much greater waste reduction and recycling across government" as a priority. The 2004 Strategic Direction noted that

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<sup>113</sup> Report for Green Procurement of Service by Local Government, GHD for the Swan Catchment Council, July 2006.

<sup>114</sup> Third National Buying Green Conference and Exhibition, 25-26 May 2006.

<sup>115</sup> Peter Hoare, WALGA, Personal communication.

<sup>116</sup> Business Plan 2006-07, WA Waste Management Board.

'as well as providing support and encouragement, the State Government needs to lead by example, by reducing generation of waste and maximising recycling and buying recycled-content products in its own areas of activity'. Specifically, Government should 'encourage and support resource efficiency in Government, for example, through EcoOffice and procurement initiatives, and improvements in recycling of the valuable resources in waste.'

The emphasis on education and communication within the DEC and the Waste Management Board provides opportunities for better promotion of the program as does the prospect of more Green Stamp businesses promoting themselves as Green Stamp accredited.

With improved management and measurement there are clearly new funding opportunities for the program which can address some of the long running threats such as uncertainty and lack of staff continuity.

### Threats

One of the threats identified includes the difficulty involved in influencing large numbers of customers, particularly for the MTA scheme whose members supply to individual consumers. This is not such an issue for business to business transactions as it is easier to target and influence government and business customers.

The long-standing uncertainty regarding the continuation of the program due to funding constraints has been a major barrier to the wider uptake of preferential purchasing by customers. Customers do not wish to change their selection criteria for a program that has no long term future.

As discussed previously, the perception that the Green Stamp is a DEC program can be a barrier to obtaining funding from other sources, especially other State Government agencies. One solution to this might be assistance from the DEC in jointly approaching these agencies, or alternatively a clearer identification of Green Stamp as an industry program.

There is competition for funding from other groups attempting to improve the environmental performance of SMEs and several potential funders have already been "captured" by other programs. For this reason it is important to clarify the different objectives of Green Stamp compared with these more compliance level programs and to differentiate Green Stamp.

There is a potential conflict of interest between the objectives of industry associations in providing a range of "free" member services and a program such as Green Stamp which needs to create value in a cross-industry brand due to a range of issues:

- The risk of dilution of the program due to confusion with other environmental programs run by associations, for example the title of the MTA coordinator is the Environmental Coordinator, rather than the Green Stamp Coordinator, presumably reflecting the range of activities covered, which are now expanding to include health and safety;

- A reluctance to implement “user-pays” fee structures which can reinforce the value of the brand as well as partly cover costs; and
- The possible perception that there is a lack of rigour in auditing for accreditation/certification as a refusal might lead to a member resignation.

### **Recommendations**

1. Develop a clear list of objectives for Green Stamp and develop a strategy based on these objectives.

It is suggested that the most appropriate objectives would include:

- To recognise and reward businesses that improve their environmental performance beyond compliance through preferential purchasing from Green Stamp businesses by customers including local governments, State Government agencies and other businesses; and;
- Increase the number of Green Stamp businesses in each industry sector.

The strategy for achieving these objectives might include:

- Working with WALGA and groups of local government officers to have Green Stamp accreditation/certification included as a selection criterion for the selection of autoservices, printing and cleaning providers;
- Working with DEC and other State Government agencies such as the State Supply Commission and the Department of Industry and Resources to have Green Stamp accreditation/certification included as a selection criterion for the selection of autoservices, printing and cleaning providers;
- Working with DEC and other industry associations such as the Chamber of Minerals and Energy and the Property Council of WA to have Green Stamp accreditation/certification included as a selection criterion for the selection of autoservices, printing and cleaning providers;
- Working with the members of the Green Stamp industry associations to encourage them to use Green Stamp accredited businesses for autoservices, printing and cleaning;
- Assisting Green Stamp businesses to promote the program through advertising, brochures and tenders, the MTA scheme should focus on encouraging participants such as RAC services to advertise their accredited status, while the PIA and BSCAA schemes should focus on business to business advertising; and
- Publicising the preferred status of Green Stamp businesses to potential Green Stamp businesses within the three industries to increase the number of participants.

2. Develop measures for the success of the program that reflect the objectives of the program and meet the needs of stakeholders.

Such measures of success will include:

- Measures of the impact of the program on environmental performance, for example:
  - Savings in natural resources used, including water, energy, materials;
  - Reduction in volume of pollutants entering the atmosphere and sewerage system;
  - Reduction in the amount of waste to landfill; and
  - Savings to the business through the reduced cost of waste disposal.

As discussed earlier, much of this data can be collected through the accreditation/certification assessments and the yearly re-accreditation/re-certification will provide the opportunity to gather information on improvements made during the year. It will be necessary to review the assessment criteria and evaluate what categories of information will be most useful, but at the least data should be collected on the amounts and types of waste produced and recycled.

- Measures of the successful adoption of a preference for Green Stamp businesses amongst customers:
  - Number of customer organisations specifying a preference for Green Stamp;
  - Number of tenders, contracts awarded to Green Stamp businesses compared with non-Green Stamp businesses;
  - Awareness of the program amongst customer groups; and
  - Level of satisfaction with the program benefits amongst Green Stamp businesses.
- The numbers of Green Stamp businesses within each industry sector.

It has been claimed that the success of the Green Stamp program could not be measured by the number of accredited businesses because this is affected by procurement decisions made by external stakeholders. As the number of Green Stamp businesses will be affected by the success or otherwise of efforts to gain customer recognition and preference, which is a critical objective of the program, the number of participants is a measure of the program's success.

3. Develop strong messages and a strategy for educating key stakeholders about Green Stamp.

These messages should focus on differentiating Green Stamp businesses as environmentally excellent and the business of choice for environmentally aware purchasers. As shown by the PIA and BSCAA schemes the most effective method of education is word of mouth and targeted

communication rather than blanket advertising to consumers, however if businesses can be encouraged to include the Green Stamp message in their advertising this is likely to be very effective.

4. Focus on influencing Government procurement decisions through the inclusion of environmental accreditation/certification as part of the selection criteria for State and Local Government autoservice, printing and cleaning contracts. This will require a partnership approach involving the program manager, industry associations and the DEC.

5. Provide continuity to the Program in the medium term by funding the existing coordinator positions and providing some operational funding.

It is critical that the expertise of the existing coordinators and the momentum of the Green Stamp program are maintained. The Waste Management Board could consider funding the coordinator positions for each of the three schemes with additional funding for operating for each of the three schemes and operating for the overall program for the next eighteen months to two years, with this funding to be phased out by mid 2008 and replaced by fee income and other funding sources (see further recommendations).

6. Appoint a program manager, reporting to a Green Stamp management committee including:

- representatives of the three existing schemes;
- the industry scheme coordinators;
- the DEC (Community Education and Waste Management Branches);
- WALGA (procurement policy); and
- State Government Supply Commission.

The program manager should be responsible for:

- Implementing the overall strategy for Green Stamp;
- Ensuring the new measures are built in to the assessment criteria for each scheme;
- Collating data from each of the schemes and reporting to stakeholders;
- Managing the Green Stamp web site which should be hosted by an industry association rather than the DEC;
- Accessing funding for the program coordinator role and operating funds for the program;

- Working with other stakeholders to achieve recognition of the program with customers; and
- Managing any future expansion to other industry sectors.

7. Review the fees received from certification/recertification to begin generating an income stream which can be used to partially offset salaries. The PIA and BSCAA schemes are currently on a sliding scale relating to either number of employees or turnover.

Company size	Certification fee	Recertification (yearly)
Small (1-15 staff)	\$99	\$55
Medium (16 – 40 staff)	\$220	\$110
Large (> 41 staff)	\$440	\$220

Table 9: PIA scheme fee structure

The MTA should consider introducing a sliding scale of fees in a similar range rather than the current accreditation fee of \$150 with a \$50 yearly renewal fee. This is a very low fee considering each visit requires 1.5 to 2 hours on site plus planning and travel time.

All three industry associations should consider:

- Charging a fee for the initial assessments, whether or not the business goes on to gain the Green Stamp;
- Charging a small extra fee for the actual certification/accreditation; and
- Increasing the re-accreditation/recertification fee to the same level as for the original assessment.

Company size	Assessment fee	Certification fee	Recertification (yearly)
Small (1-15 staff)	\$99	\$10	\$99
Medium (16 – 40 staff)	\$200	\$20	\$200
Large (> 41 staff)	\$400	\$40	\$400

Table 10: Proposed fee structure

This fee structure is closer to a “user-pays” system and will more properly value the time and effort involved in providing assessments, while having a smaller nominal fee for the actual certificate prevents any possibility that this component can deter businesses from completing certification.

Currently all of the associations provide the initial assessments free of charge, but since businesses can use the self-assessment to do this for themselves they would probably be more likely to prepare in advance if they have to pay for the assessment. The businesses which are currently using large amounts of program resources and not achieving accreditation due to compliance issues will be less likely to request assessment unless they are ready to consider becoming compliant.

There will naturally be concern that raising the fees will lead to the loss of Green Stamp participants who cannot see value in the program, however it is also likely that paying more for the program will lead to them demanding more value from the program and being more willing to assist in building value in the brand, for example through advertising their Green Stamp status (for example MTA businesses) and working to influence their customers to require Green Stamp.

8. Develop a funding strategy and plan to develop new sources of funding. In addition to the possible funding sources identified there is still the possibility of sponsorship, probably by a major supplier<sup>117</sup>.

9. Develop milestones for implementation of each of the recommendations above and tie them to funding milestones.

The Waste Management Board could consider funding the coordinator positions for each of the three schemes with additional funding for operating for each of the three schemes and operating for the overall program for the next eighteen months to two years, with this funding to be phased out by mid 2008 and replaced by fee income and other funding sources.

There could be an expectation that during that time the fee structures will be reviewed and a strategy to obtain other funding will be developed and pursued (again in partnership with key stakeholders including DEC). This funding might be provided under the Strategic Partnerships Placement program.

Following the recommended review of fee structures perhaps some of the funding for each of the three coordinator positions can be obtained from fees charged for assessments, accreditation/certification and re-accreditation/re-certification.

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<sup>117</sup> Ian Westoby, BSCAA, Personal communication.

Scheme	Current Participants	Average fee	Income
MTA	48	\$150	\$7,200
PIA	16	\$150	\$2,400
BSCAA	12	\$150	\$1,800

Table 11: Conservative estimate of income with current participation levels under revised fee structure

As shown in the table above the assessments and certifications/accreditations undertaken for the MTA by the MTA coordinator and for the printing/cleaning industries by the PIA/BSCAA Coordinator should be covered by the fees received. Assessment of 48 MTA sites will require 24 days of the year or 4.8 weeks/46 working weeks (10% of a full-time load) and generate roughly 10% of a full-time salary.

As numbers of participants increase the income (and time required) will also increase.

The initial MTA funding application (December 2000) estimated that 300 businesses would register for Green Stamp in the first year, 500 in the second year, 550 in the third year, 400 in the fourth year and a further 250 in the fifth year, that is half the industry would be Green Stamp accredited by the fifth year. It was calculated that each business would receive sufficient services and value from Green Stamp to allow a fee of \$186.65 to be charged for accreditation and each year's re-accreditation, making the program self-funding after the first year with 300 participants paying \$56,055.

These goals are ambitious given the information now available regarding the poor compliance levels in the industry; however the program does need to move towards becoming self-funding and sustainable.

Perhaps following 2008 a Program Manager position would be funded by the Waste Management Board or other Departmental funding in recognition of the "public good" nature of the program.

This role might be undertaken by the current cleaning/printing industries coordinator, who has the most experience and is already intimately familiar with two of the industries.

Year	Item	Item	Item	Item	Source
Jan – Dec 2007	MTA Scheme Coordinator's salary \$50,000	Scheme operating \$5,000			WMB
	PIA/BSCAA Coordinator's	Scheme operating			WMB

	salary \$50,000	\$10,000 (\$5,000/scheme)			
	Overall Program operating \$15,000				WMB
Jan- June 2008	MTA Scheme Coordinator's salary \$25,000	Scheme operating \$2,500			WMB
	PIA/BSCAA Coordinator's salary \$25,000	Scheme operating \$5,000 (\$2,500/scheme)			WMB
June – Dec 2008	Program Manager's salary \$52,500	Program operating \$15,000			WMB
		Scheme operating \$15,000 (\$3,000/scheme)			WMB
	MTA Coordinator's salary				Fees/ Other funding sources, eg SEDO, Sponsorship
	PIA/BSCAA Coordinator's salary				Fees/ Other funding sources, eg SEDO, Sponsorship

Table 12: Possible funding schedule

It is assumed that the Program Manager will require more operational funding in the first year or two as targeted efforts to achieve customer recognition and rewards for participants are undertaken. The schemes will require operational funding during 2007-2008 to revise assessment criteria materials and incorporate new questions enabling data collection. Recognising the Waste Management Board's reluctance to enter a recurrent funding situation, by mid 2008 other funding sources should be identified and secured for the Coordinator's salaries shortfall (after fee income).

In the longer term it is likely the program will reach a plateau stage where the role of Program Manager will be less demanding and then this role might be rotated between Scheme Coordinators

and covered by fee income. However it is assumed that if the Program can successfully revise its focus and strategy that other industries will be keen to initiate their own Green Stamp schemes and this will require significant mentoring and leadership, probably requiring at least a part-time Program Manager role which will require extra funding.

10. Develop a strategy for extending the Green Stamp program to other industry sectors.

While recognising that the program requires refocusing and strengthening before it can be expanded, the successful implementation by the printing and cleaning industries and the interest shown by other sectors indicates that Green Stamp is an excellent model for SMEs and will be of value to other sectors.

11. In the longer term consider the option of independent third party audits for re-accreditation/re-certification.

The initial assessments and accreditation/certification might still be done by the industry associations according to the fee structure discussed above but the yearly re-accreditation/re-certification might be conducted by external assessors appointed and trained by the Green Stamp program.

This would ensure transparency in the audit process giving a higher degree of integrity to the certification standard.

## Appendix A: Stakeholders contacted during the preparation of this report

Stakeholder	Contact details
Greg Allen Manager Communications Branch Department of Environment and Conservation	9222 8601 <a href="mailto:greg.allen@dec.wa.gov.au">greg.allen@dec.wa.gov.au</a>
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John Burnside CEO Nursery and Garden Industry Association	9358 4811
John Davis Senior Project Coordinator Waste Management Branch Department of Environment and Conservation	6467 5200 <a href="mailto:john.davis@dec.wa.gov.au">john.davis@dec.wa.gov.au</a>
Peter Fitzpatrick Executive Director Motor Trade Association WA	9345 3466 <a href="mailto:pfitzpatrick@mtawa.com.au">pfitzpatrick@mtawa.com.au</a>
Peter Hoare Director of Services WALGA	9321 5055
Ken Lee Head Office Autobahn	9209 2908
Paul Lock Sustainable Production Officer SERCUL	9458 5664 <a href="mailto:paullock@sercul.org.au">paullock@sercul.org.au</a>
Peter Male Bellevue Sustainable Industry Project Coordinator Swan Catchment Council	9374 3306 <a href="mailto:peter.male@environment.wa.gov.au">peter.male@environment.wa.gov.au</a>
Wesley McClelland RAC	0419 809 219
Cameron McPhee Swan Catchment Centre	9374 3333
James Milne (Zero Waste Plans) Waste Management Branch Department of Environment and Conservation	
Paul Nieuwhof Regional Manager WA	9361 4625 <a href="mailto:paul@printnet.com.au">paul@printnet.com.au</a>

Printing Industries Association of Australia	
Chris Quinn Lawn Mowing Contractors Association	9250 7943
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Martin Taylor Industry Liaison Manager Centre of Excellence in Cleaner Production Curtin University of Technology	9266 3318 <a href="mailto:Martin.Taylor@curtin.edu.au">Martin.Taylor@curtin.edu.au</a>
Ian Westoby Executive Director Building Services Contractors Association	9310 6518 <a href="mailto:bscaawa@bscaa.asn.au">bscaawa@bscaa.asn.au</a>
Angela and Andrew Yates Printsmart	9493 7155
Jamie Young Amcor	<a href="mailto:jamie.young@amcor.com.au">jamie.young@amcor.com.au</a>

## Appendix B: Analysis of environmental issues addressed by assessment criteria

Environmental issue	Assessment criteria relating to issue (no.)
<b>Solid waste</b>	
MTA Scheme Mechanical Repairers criteria	Scrap metal & parts are removed for recycling. Batteries are sent off or removed for recycling. Cardboard waste is directed to recycling or reuse. Rags / absorbent pads are removed for recycling. Bulk oil & chemical containers (20 – 200L) are removed for reuse or recycling. Oil filters are drained, crushed & removed for recycling as scrap metal. Waste tyres are removed by a waste contractor for approved disposal, recycling or reuse. (7)
MTA Scheme Body Repairers criteria	Scrap metal & parts are removed for recycling. Batteries are sent off or removed for recycling. Cardboard & paper waste is directed to recycling or reuse. Rags / absorbent pads are removed for recycling. Plastic bumpers are removed for recycling or repaired in-house. Headlights are removed for reuse. Waste tyres are removed by a waste contractor for approved disposal, recycling or reuse. (7)
PIA Scheme criteria	Business recycles paper Solid wastes are removed from the premises for recycling or reuse: Scrap metal Rags/absorbent pads Used ink containers Empty chemical drums Inkjet and Toner cartridges Shrink wrap Paper or polymer plates Film Wooden pallets. (10)
BSCAA Scheme Contract Cleaners criteria	The business offers clients the opportunity to incorporate a range of cleaning practices that are non-toxic & reduce, reuse or recycle the quantity of wastes they produce. (1)
BSCAA Scheme Carpet Cleaners criteria	Impact assessment of the carpet cleaning business addresses issues including: • solid & liquid waste disposal (1)
<b>Liquid waste</b>	
MTA Scheme Mechanical Repairers criteria	A licensed carrier removes waste oil for recycling or reuse. A licensed waste contractor removes radiator coolant. (2)
MTA Scheme Body Repairers criteria	A licensed carrier removes waste oil for recycling or reuse. A licensed waste contractor removes radiator coolant. A licensed contractor removes old or excess paint. Waste solvent thinners are recycled by either: - An external contractor that removes the product from the premises, or - Internally using the workshop's own approved solvent recycling machine (4)

PIA Scheme criteria	-
BSCAA Scheme Contract Cleaners criteria	The business offers clients the opportunity to incorporate a range of cleaning practices that are non-toxic & reduce, reuse or recycle the quantity of wastes (1)
BSCAA Scheme Carpet Cleaners criteria	Impact assessment of the carpet cleaning business addresses issues including: • solid & liquid waste disposal (1)
<b>Air Quality</b>	
MTA Scheme Mechanical Repairers criteria	The workshop commissions, decommissions, services or repairs automotive air conditioning systems and has <i>Business Registration</i> on minimum equipment standards. At least one person in the workshop has <i>Individual Accreditation</i> on ozone awareness. The workshop has on display a copy of the <i>Code of Practice for the Control of Refrigerants Used in Automotive Airconditioners</i> . Refrigerant gas is reclaimed & removed by supplier/contractor for approved disposal. Any containers containing solvents are kept closed when not in use to prevent evaporation. A re-circulating solvent based parts washer is used when using solvents (such as kero) to clean parts. A water-based parts washer is used to clean parts. (7)
MTA Scheme Body Repairers criteria	All spray painting & repair work is conducted inside the workshop. All spray painting is conducted in an approved spray booth with an exhaust fan & filter. Spray booth filters are changed over as per the manufacturer's recommendations. In addition to or as an alternative to compressed air spray guns the spray painters use: - High volume, low pressure spray guns - Airless spray guns Solvent containers are kept sealed between uses. Recycled thinner (gunwash) is used to clean guns. The workshop has a gun cleaning station that captures & uses re-circulated gunwash. The business uses: - Waterborne paints - Low emission (LE), high solid paint Sanders have dust vacuum systems If the workshop commissions, decommissions, services or repairs automotive air conditioning systems it has <i>Business Registration</i> on minimum equipment standards. At least one person in the workshop has <i>Individual Accreditation</i> on ozone awareness. The workshop has on display a copy of the <i>Code of Practice for the Control of Refrigerants Used in Automotive Airconditioners</i> . Refrigerant gas is reclaimed & removed by supplier for approved disposal. (13)
PIA Scheme criteria	Inks with a low VOC (Volatile Organic Compound) content are used. (1)
BSCAA Scheme Contract Cleaners criteria	-
BSCAA Scheme Carpet Cleaners criteria	-
<b>Wastewater Management</b>	

<p>MTA Scheme Mechanical Repairers criteria</p>	<p>All repair &amp; servicing work is conducted inside the workshop.          Vehicle washing &amp; engine degreasing is conducted in a dedicated wash down bay that drains to an oil separation system.          External stormwater drains are marked with the following or similar. <i>"Clean Water Only"</i> or <i>"Drains to River"</i>          Workshop floor drains to an oil separation system.          Areas storing oil or oil contaminated parts drain to an oil separation system.          Business has an oil separation system to manage wastewater prior to approved disposal.          If a petrol &amp; oil trap it is registered under the Water Corporation's Waste Track System &amp; is serviced / cleaned out on a regular basis as calculated by the Water Corporation.          Personnel refer to the manufacturer's service &amp; maintenance procedures / guidelines when cleaning system.          Separator is given a minor service every month.          Separator is given a full service at least once per year.          At least 2 members of staff are trained at how to clean the oil separator.          A log book is kept of oil separator cleans &amp; services.          Fluids from all parts washers, irrelevant of chemicals used (ie: acid, caustic, solvent), are removed for approved disposal by a licensed contractor &amp; not directed towards oil separation systems or drains.          The workshop uses quick-break, biodegradable degreasers &amp; detergents where wastewater is drained to oil separation system.          The business has an <i>Industrial Waste Permit</i> to discharge wastewater to sewer.          (15)</p>
<p>MTA Scheme Body Repairers criteria</p>	<p>Vehicle washing &amp; engine degreasing is conducted in a dedicated wash down bay that drains to a sediment tank &amp; oil separation system.          The workshop floor drains to a sediment tank or silt trap.          Sediment trap is cleaned out on a regular basis (ie: at least once per month)          Business has an oil separation system to manage wastewater prior to approved disposal.          If the system is a petrol &amp; oil trap it is registered under the Water Corporation's Waste Track System &amp; is serviced / cleaned out on a regular basis as calculated by the Water Corporation.          Personnel refer to the manufacturer's service &amp; maintenance procedures / guidelines when cleaning systems.          Separator is given a minor service every month.          Separator is given a full service at least once per year.          At least 2 members of staff are trained at how to clean the oil separator.          A log book is kept of oil separator cleans &amp; services.          The workshop uses:          - Biodegradable / phosphate free detergents when cleaning the outside of vehicles.          - Quick-break, biodegradable degreasers are used when degreasing &amp; directing wastewater to an oil separation system.          The business has an <i>Industrial Waste Permit</i> to discharge wastewater to sewer.          Workshop floor is swept or vacuumed regularly &amp; washed down rarely if at all.          External stormwater drains are marked with the following or similar:          • <i>"Clean water only"</i> or          • <i>"Drains to river / nearby wetland"</i>          Fluids from all parts washers, irrelevant of chemicals used (ie: acid, caustic, solvent), are removed for approved disposal by a licensed contractor &amp; not directed towards wastewater system or drains. (15)</p>

PIA Scheme criteria	<p>Business holds all relevant permits/licenses( for discharge to sewer)                      The following contaminants are prevented from entering the stormwater system;</p> <ul style="list-style-type: none"> <li>- Inks</li> <li>- Chemicals</li> <li>- Glues/Adhesives</li> <li>- Varnishes</li> <li>- All other hazardous liquids</li> </ul> <p>Business has an effective system for managing silver bearing wastewater from pre-press film development. (3)</p>
BSCAA Scheme Contract Cleaners criteria	<p>There are no signs of wastewater entering on-site stormwater drains.                      All greywater is discharged to drains leading to sewer or septic.                      All stormwater drains are marked / stencilled to remind no discharge of wastewater to these drains. (3)</p>
BSCAA Scheme Carpet Cleaners criteria	<p>Impact assessment of the carpet cleaning business addresses issues including:</p> <ul style="list-style-type: none"> <li>• wastewater management</li> </ul> <p>There are no signs of wastewater entering on-site stormwater drains.                      All greywater is discharged to drains leading to sewer or septic.                      All stormwater drains are marked / stencilled to remind no discharge of wastewater to these drains. (4)</p>
<b>Chemical use &amp; handling/ spill management</b>	
MTA Scheme Mechanical Repairers criteria	<p>The following contaminants are stored on sealed ground in a bunded, undercover area:</p> <ul style="list-style-type: none"> <li>- new engine oil &amp; other lubricants</li> <li>- used engine oil &amp; other lubricants</li> <li>- coolants</li> <li>- batteries</li> <li>- solvents, acids, caustics &amp; cleaning chemicals</li> <li>- parts containing oil, coolant or other chemicals</li> <li>- other fluids</li> </ul> <p>All containers used for storing chemicals &amp; contaminated components are sealed, not spilling over &amp; free of leaks.                      Workshop has bunding across all external openings, or, the workshop floor drains inwards.                      Premises has an emergency spill kit that contains:</p> <ul style="list-style-type: none"> <li>- Absorbent granules</li> <li>- Absorbent pads &amp; pillows</li> <li>- Containment booms</li> <li>- Brooms, dust pan, mops</li> <li>- Gloves &amp; other protective equipment depending on chemicals held on site</li> </ul> <p>The spill kit is clearly visible and easily accessible to all staff at all times.                      A formal spill management plan is visible to all personnel.                      All personnel are trained in spill response according to the spill management plan.                      Larger spills (that take more than a few minutes to clean up) are recorded.                      Material safety data sheets (MSDS) are held on site for all chemicals used. (9)</p>
MTA Scheme Body Repairers criteria	<p>The following contaminants are stored on sealed ground in a bunded, undercover area.</p> <ul style="list-style-type: none"> <li>. Thinners</li> <li>. Paint</li> <li>. Solvents, acids, caustics &amp; cleaning chemicals</li> </ul>

	<p>. Engine oil &amp; other lubricants (new &amp; used)          . Coolants          Contaminated parts such as those containing oil, brake fluid, battery acid, radiator fluid etc are stored in:          . Sealed containers or bins          . Undercover in a bunded area          All containers used for storing chemicals &amp; contaminated components are sealed, not spilling over &amp; free of leaks.          Workshop has bunding across all external openings, or, the workshop floor drains inwards.          Premises has an emergency spill kit that contains:          . Absorbent granules          . Absorbent pads &amp; pillows          . Containment booms          . Brooms, dust pan, mops          . Gloves &amp; other protective equipment depending on chemicals held on site          The spill kit is clearly visible &amp; easily accessible to all staff at all times.          A formal spill management plan is visible to all personnel.          All personnel are trained in spill response according to the spill management plan.          Larger spills (that take more than a few minutes to clean up) are recorded.          Material safety data sheets (MSDS) are held on site for all chemicals used. (10)</p>
PIA Scheme criteria	Business has appropriate mechanisms & systems in place to manage potential spill incidents including stormwater contamination. (1)
BSCAA Scheme Contract Cleaners criteria	<p>The business has procedures to contain spills &amp; emergency incidences that could cause pollution or the unauthorised discharge of potential contaminants including wastewater (greywater), chemicals, solid &amp; liquid wastes.          All containers used for chemical storage are sealed, free from leakage &amp; lids fastened tight if not in use.          All chemicals are stored inside on sealed ground with perimeter bunding to prevent the flow of contaminants to outside drains or open ground.          All vehicles have secure storage facilities such as spill trays to ensure spilled chemicals can be contained &amp; easily cleaned up.          Material safety data sheets are held on site for all chemicals used or stored.          Funnels, measuring containers, dispensing systems etc are used to reduce the risk of spills &amp; prevent overuse of chemicals.          A written spill management procedure is on display in areas where chemicals are mixed, stored or dispensed.          The premises has equipment on site to clean up a spill from the largest chemical container held on site. (8)</p>
BSCAA Scheme Carpet Cleaners criteria	<p>Impact assessment of the carpet cleaning business' addresses issues including:          • chemical use and handling          • spill management          The business has procedures to contain spills &amp; incidences that could cause pollution or unauthorised discharge of potential contaminants including wastewater (greywater), chemicals, solid &amp; liquid wastes          All containers used for chemical storage are sealed, free from leakage and lids fastened tight if not in use.          All chemicals are stored inside on sealed ground with perimeter bunding to prevent the flow of contaminants to outside drains or open ground.          All vehicles have secure storage facilities such as spill trays to ensure spilled chemicals can be contained &amp; easily cleaned up.</p>

	<p>Material safety data sheets are held on site for all chemicals used or stored.                  Funnels, measuring containers, dispensing systems etc are used to reduce the risk of spills &amp; prevent overuse of chemicals.                  A written spill management procedure is on display in areas where chemicals are mixed, stored or dispensed.                  The premises has equipment on site to clean up a spill from the largest chemical container held on site. (9)</p>
<b>Energy conservation</b>	
MTA Scheme Mechanical Repairers criteria	<p>Workshop has skylights that provide natural lighting, minimising use of artificial lighting to overcast days &amp; low light work hours.                  Energy efficient globes &amp; reflectors are used throughout the workshop.                  Compressor air hoses, tools &amp; connections are checked regularly (monthly) for leaks &amp; repaired promptly.                  The compressor is turned off after hours (3)</p>
MTA Scheme Body Repairers criteria	<p>Workshop has skylights that provide natural lighting, minimising use of artificial lighting to overcast days &amp; low light work hours.                  Energy efficient globes &amp; reflectors are used throughout the workshop.                  Compressor air hoses, tools &amp; connections are checked regularly (monthly) for leaks &amp; repaired promptly.                  The compressor is turned off after hours. (4)</p>
PIA Scheme criteria	<p>Business has made an effort to maximise the amount of natural light entering the production area.                  Business uses computer to plate (CTP) technology or sources plates using CTP technology. (2)</p>
BSCAA Scheme Contract Cleaners criteria	<p>The business is reducing energy consumption by implementing at least one of the following practices:</p> <ul style="list-style-type: none"> <li>- installing energy efficient globes or</li> <li>- reducing the number of globes installed in light fittings throughout the premises.</li> <li>- Utilising natural light by installing skylights or similar (1)</li> </ul>
BSCAA Scheme Carpet Cleaners criteria	<p>Impact assessment of the carpet cleaning business' addresses issues including:</p> <ul style="list-style-type: none"> <li>• simple energy efficiency issues related to the site</li> </ul> <p>The business is reducing energy consumption by implementing at least one of the following practices:</p> <ul style="list-style-type: none"> <li>- installing energy efficient globes or</li> <li>- reducing the number of globes installed in light fittings throughout the premises.</li> <li>- Utilising natural light by installing skylights or similar (1)</li> </ul>