



4 September 2019

Department of Water and Environmental Regulation
Prime House
8 Davidson Terrace
JOONDALUP WA 6027

Email: wastereform@dwer.wa.gov.au

Dear Sir/Madam,

Re: Submission on DWER Issues paper - Waste not, want not: valuing waste as a resource

Please find below our comments on the Issues Paper "*Waste not, want not: valuing waste as a resource*" (June 2019) provided as part of the Department's consultation process to develop a legislative framework for waste-derived materials:

- Legislation that will "encourage the use of fit-for-purpose, waste-derived materials and Western Australia's move to a circular economy" is to be applauded; it is a long overdue step that will protect the environment, the long-term future of our communities and create industries of the future.
- The Issues Paper provides the definition for 'Waste', as defined in Environmental Protection Act and the Waste Avoidance and Resource Recovery Act, "Waste includes matter:
a) whether liquid, solid, gaseous or radioactive and whether useful or useless, which is discharged into the environment; or
b) prescribed to be waste."

This definition is all encompassing, as such the legislative framework should be all encompassing.

- The Issues Paper refers to the Waste Strategy 2030 (Strategy) and its aim to build a market for waste-derived materials while protecting the environment. However, there is a gap in the thinking of the Issues Paper and the Strategy; wastewater is not a Focus Material and the opportunity to recycle the very large volumes of wastewater is not properly considered, over 100 GL of wastewater currently being disposed of to the ocean has been disregarded. This is disappointing given the intent of the Strategy and the proposed legislative framework.
- The effect of this omission is to overlook a significant element of the circular economy and continue to drive a preference for the use of groundwater. Currently there is no obligation to engage with industry or the community to find a better solution prior to disposal. There is a market for wastewater; industries are crying out for additional groundwater allocations and access to the wastewater provides a viable medium to long-term alternative source.



- Industry have a range of fit-for-purpose uses for wastewater, creating business and community opportunities. Climate change has put pressure on groundwater allocations and its future use, restricting business and employment opportunities, as well as much needed support for public open space. Wastewater is a valuable state resource which should not simply be disposed of to the ocean.
- Access to wastewater is poorly understood and potentially open to monopolistic exploitation, at the expense of economic growth, thriving communities and the financial health of the state. The preparation of this legislation is a once in a generation opportunity to implement the most significant step change in how business and the community thinks about sustainability to ensure we can “meet the needs of the present without compromising the ability of future generations to meet their own needs”. If Western Australia intends to become a sustainable, low-waste, circular economy wastewater must be captured under the proposed legislative framework.

We trust the comments in this submission provides another perspective on the importance and value of wastewater as a reusable resource and foster a more holistic approach to managing and regulating the economic and social benefits of wastewater recycling.

Your faithfully,

A handwritten signature in blue ink, appearing to read 'Dm' DM'.

Deanne McDonald
Director