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Subject: Issues Paper - Waste Derived Materials
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Good afternoon

Please see the below comments in relation to the above mentioned Issue Paper.

It is often the conversion of waste to a waste derived material that is the critical issue.

A local case study is provided by the King Road unlawful activity, whereby building rubble brought to the site was of unknown quality (asbestos containing potential), and that the contemplation of crushing and screening to convert to a waste derived material would have been of significant environmental and amenity impact. The estimated rectification of this sites misuse is expected to be as high as \$7million.

There have also been some examples from recent inner city building demolitions, whereby permission has been granted by those local governments for a demolished building in their area to be crushed and screened on site for re-use as a waste derived material. What was found however was the operator then began to bring other construction waste to that site (assuming from other demolition contracts nearby), to take advantage of the approval that was only ever intended for onsite materials to be crushed and screened.

Waste derived materials are part of the waste solution, however it is the process of converting waste into a waste derived material that often poses environmental and amenity risks. Appropriate regulatory standards for quality control at both receipt and end production is critical to reduce any potential threats to the environment.

Also, the notion of liquid waste to form a waste derived material needs careful and further thought, given it poses significantly higher risks than inert materials like building and construction. Although the controlled waste regulation around liquid waste provides a good standard of duty of care, the ongoing inspection and regulation of licence holders, (producer/transporter/disposer), would benefit from additional resource and increased scrutiny. A number of high profile cases of contaminated materials being transported, disposed or discharged to land have been evident in WA and too much self-regulation has been placed on operators in the past, in particular, the operations management of a disposal/receipts facility. The Bio-Organics facility in Oakford is a classic example of high level, self-regulation. The site operated for 12 years with unknown levels of environmental impact, due to the limited regulation surrounding the operation of the site. The impacts to the environment are of an unknown quantity and further investigation to potential contaminated sites, including neighbouring properties are ongoing. This highlights the huge risk associated with operators of these types of facilities, without competency checks or assessment of continuing competence, the vain hope that operators "do the right thing" is a high risk policy.

The WRAP program in the UK has seen significant improvement in the quality of waste derived materials being reused and a great shift towards a circular economy. WRAP

has provided guidance on behalf of the UK Government to improve Materials Recovery Facilities infrastructure, to ensure end product material quality is of a standard for sale and reuse to various markets around the world. In particular, plastic wash systems have been integrated to existing infrastructure, subsequently, allowing the products to be classified without the post-consumer tag, that has seen the Chinese National Sword policy being introduced and as a consequence of which, having a worldwide impact on recycling as a whole.

One of the key issues is quality, the processes are only as good as the materials going in and this starts with “at source” education/regulation and furthermore, process availability within Australia, in particular WA, where there is limited infrastructure and end user specialised processes.

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