

From: [Alex Tucker](#)
To: [Waste Reform](#)
Subject: Submission on issues paper - Waste not, want not: valuing waste as a resource
Date: Tuesday, 3 September 2019 4:08:49 PM

To whom it may concern,

Thank you for the opportunity to provide comment on the DWER issues paper 'waste not, want not: valuing waste as a resource.'

Through the South Coast Sustainable Waste Alliance, which consists of the City of Albany and the Shires of Denmark, Plantagenet and Jerramungup, we are committed to working together on a sustainable approach to waste management that meets the needs of our communities in a manner that is cost effective, innovative and environmentally sustainable. An important element to achieving environmentally sustainable waste management is to encourage and support the reuse of waste-derived materials in line with the circular economy principle.

We offer the following specific comments for your consideration.

Development of a comprehensive legislative framework that encourages innovative use of waste-derived materials is a positive step towards the vision of the Waste Avoidance and Resource Recovery Strategy 2030 to become a sustainable, low-waste, circular economy in which human health and the environment are protected from the impacts of waste. It is critical that this framework includes a clear definition of waste and, specifically, waste-derived materials.

To ensure waste-derived materials are used to their maximum capacity and to optimise development of local industry it is important that the new legislation allows for a smooth and clear approval process for both standard and bespoke uses. To this end, the Queensland approach – utilising a system of approved codes (EOWs) for common waste-derived materials to allow for a smooth approach for local and regional recycling operations wishing to use standard re-use technologies – is our preferred method. The use of set approvals should also be used as a reference point for the approval process of bespoke uses. When developing bespoke approvals, a staged approval process specific to that industry or use should be considered until sufficient evidence exists that the use is fit-for-purpose and will not cause harm to human health or the environment.

In summary, the Alliance recommends that the Department prioritises the clear definition of waste, provides a combination of bespoke and general orders and conditions and considers the role that industry expertise can play in providing the required evidence for determining new approvals.

Thank you for the consideration of our submission. We look forward to seeing Western Australia become a trailblazer in the solution to valuing waste as a resource.

If you require any further information please do not hesitate to contact me on (08) 9892 1135 or email env@sop.wa.gov.au.

Yours sincerely,

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On behalf of the South Coast Sustainable Waste Alliance

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