

## Submission to Department of Water and Environmental Regulation (DWER) Issues Paper: 'Waste not Want Not: Valuing Waste as a Resource'

*The WAFarmers Dairy Council and Western Dairy jointly submit the following comments to the DWER Issues paper: 'Waste Not Want Not: Valuing Waste as a Resource'.*

### Introduction

1. The WA Dairy Council and Western Dairy strongly support DWER's vision of WA as a state with a sustainable, low-waste, circular economy in which human health and the environment are protected from the impacts of waste.
2. We clearly understand the relevance of this vision to the dairy industry which produces effluent as part of our normal operations, including washdown at the milking shed.
3. Over the last 25 years, our industry has shifted our mindset from effluent as waste towards effluent as a resource. Much has been achieved in this space by dairy farmers, and the industry continues to move forward. Notably, a range of dairy effluent management programs, guidelines and the Code of Conduct, though not complete solutions, have collectively improved practices over the last 15 years and particularly in the last two years under the government-funded REI initiative project DairyCare.

### Recommendations

1. In relation to any future legislative framework surrounding waste as a resource, the WAFarmers Dairy Council and Western Dairy submit that financial incentives, together with ongoing research, development, demonstration and extension for effluent re-use are generally preferable to expensive regulation. We have evidence through independent reviews of practice that this is having a positive impact over time.
2. We therefore encourage DWER to:
  - a. Increase their program support for effluent re-use systems
  - b. Increase research, development, demonstration and extension for effluent re-use
  - c. Increase financial incentives for farmers to re-use effluent including as renewable energy
  - d. Encourage all milk processors to reward farmers for effluent re-use.
3. Any future legislative framework for waste re-use should recognise:
  - a. Currently, sustainable practices can attract more regulation than unsustainable practices; new arrangements should make it cheaper and easier for dairy waste to be re-used not harder and more expensive
  - b. Re-use of dairy waste and in-ground works to enable this should not be regulated
  - c. Moving liquid dairy waste from several farms to a central biodigester to generate compost and renewable energy would currently require licencing under controlled waste regulations; this licencing requirement should be removed
  - d. Different solutions are applicable to different dairy farms.

### Conclusion

WAFarmers Dairy Council and Western Dairy submit that the dairy industry has made huge strides in capturing and turning dairy waste into a resource. We also recognise that more can still be achieved in this space. Financial incentives, research, development, demonstration and extension should continue to be the mainstay of DWER's support for this process. Any future legislative framework should remove regulatory impediments to dairy farmers' use of waste as a resource rather than increase regulatory requirements.

*WAFarmers Dairy Council and Western Dairy, 16 September 2019*

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