

4 September 2019

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

Via Email (wastereform@dwer.wa.gov.au)

**RE: ISSUES PAPER: "WASTE NOT, WANT NOT: VALUING WASTE AS A RESOURCE"
WATER WEST SUBMISSION**

Water West provides the following submission in regard to the above Issues Paper.

1. Water West supports the introduction of legislation and a supporting policy framework which provides greater certainty to industry for the uptake of, and market development for, waste-derived materials
2. The Waste Avoidance and Resource Recover Strategy 2030 does not include wastewater as a Focus Material and the Issues paper does not make specific reference to wastewater, including in the discussion on Recycling and Landfill. Water West considers that wastewater is a significant resource, the value of which is currently not appropriately established under state legislation.
3. The reuse of wastewater by-products from treatment, including fit-for-purpose recycled water and biosolids, should be given equal weight as other materials in the context of encouraging *"the use of waste-derived materials, including developing product specification, to build confidence in recycled products, increase demand for them and develop relevant markets"* as stated in the Issues Paper.
4. Whilst the Department has a number of policies and guidelines encouraging and managing wastewater recycling, there is a deficiency in the whole-of-government approach to this issue.

This is particularly evident in the Government Sewerage Policy (GSP), which will become operational on 23 September 2019. Although the GSP is the pre-eminent state policy dealing with wastewater, it is devoid of any reference to wastewater as a resource and rather than promoting wastewater recycling and beneficial reuse, rather frames wastewater as a public health and environmental nuisance.

The community and industry sectors should be encouraged to value wastewater as a resource and to seek ways to incorporate this resource into a multitude of applications including as an irrigation source for public open space, irrigation for horticulture and viticulture, aquifer replenishment and industrial processing.

The inclusion of wastewater (or at the least its byproducts) in a legislative framework for waste-waste derived materials will assist in promoting wastewater as a valuable resource rather than perception of a problem and would stimulate market interest in developing applications for reuse.

5. Should wastewater be included as a waste material in the development of a legislative framework, it is important that additional regulatory controls to those that already exist relating to health and environmental considerations, are not duplicated/do not add to regulatory/compliance complexity (which would be a disincentive to market innovation for the reuse of waste byproducts such as recycled water and biosolids), but rather seek to streamline existing regulatory processes.

We trust this submission provides a useful perspective on valuing wastewater as a valuable resource and facilitates a more coordinated approach to regulation and community/industry understanding of the economic and social benefits of wastewater recycling.

Yours Sincerely



JEFF STRAHAN
Managing Director

