



11th March 2016

GS Regulatory Controls
Strategy and Reform
Department of Environment Regulation
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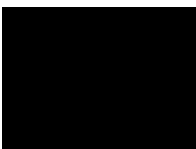
Submission on the DER Draft Guidance Statement: Regulatory Controls

C-Wise appreciates the communication of DER process and evaluation information contained within the interlinked draft guidance statement documents 'Regulatory Assessment Framework', 'Environmental Risk Assessment Framework' and 'Regulatory Controls'. We commend DER on the direction that they are taking in providing guidance to all stakeholders, premises occupiers and DER officers alike, in these fields.

There is one area in the 'Draft Guidance Statement: Regulatory Controls' that C-Wise would like to provide comment on. Included in table 1 under Category 67A: Compost Manufacturing and Soil Blending is the risk to public health and amenity caused by potential pathogen transfer through contact with compost material. We would like to highlight that no other category of prescribed premises has risks assigned to the end product that it produces and we believe that under DER's management of prescribed premises, the manufacturing process is what should be regulated not the end product itself. For example, intensive piggeries or abattoirs do not have risks assigned to the animals or meat they export, nor do chemical or pesticide manufacturing premises have risks assigned for the chemicals they produce. These end products are also not regulated under the manufacturing operations' prescribed premises licence.

C-Wise therefore believe that the risk relating to public health and amenity caused by potential pathogen transfer through contact with compost material under Category 67A in table 1 should be removed from the final 'Regulatory Controls' guidance statement.

Regards,



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