



Western Australia Branch

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Submission on Regulatory Assessment Framework, Environmental Risk Assessment Framework and Regulatory Controls

The Association appreciates the opportunity to comment on the Department of Environment Regulation Guidance Statements on Regulatory Assessment Framework, Environmental Risk Assessment Framework and Regulatory Controls. The Association hosted a workshop with the WA Local Government Association on Friday 5 February 2016 and the comments from that session have informed this Submission. The Association considers the documentation of the process the Department will be using to assess applications a positive step in ensuring transparency of decision making. The main concern for members was how this process is implemented and the assistance available from and capacity of the Department to ensure those with or seeking licences are able to effectively navigate the risk assessment process.

Regulatory Assessment Framework

- Members considered the process outline in Figure 1 of the Framework was clear, however identified that they would like timelines to be included to provide some certainty regarding the length of the decision making process.
- Members also supported a tracking system which would allow applicants to see where they were in the process.

Environmental Risk Assessment Framework

- Members considered the outline of the Risk Assessment was clear and it was a structured approach to assessing impact.
 - Members suggested that examples be provided on what a complete Risk Assessment would include.
 - More detail was requested on what the specific parameters for the risk assessment would be, particularly 'small' vs 'large' populations and 'moderate' vs 'minor' impact.
 - It was questioned why the standards for noise did not appear to be included in the framework.
 - Members questioned whether the various standards referenced in the document were appropriate for WA.

Regulatory Controls

- WMAA Members operate a number of different types of Prescribed Premises, specific comments on the Environmental Source, Emission Type, Pathway and Potential Impact was requested. Feedback included:
 - Category 13 – questioned the need to control sediment in stormwater
 - Category 64 – suggested that odour could be included
 - Category 67A –the use of the Compost should not be included in the Regulatory Control document, as this is not about regulating the facilities operation but rather the product it makes.

Support Required

- Generally the types of support members requested were:
 - Worked examples of the Risk Assessments
 - Ability to access informal advice from DER
 - Training Sessions on how to undertake the risk assessment, delivered state-wide
 - Ensuring DER has sufficient ongoing capacity to use the Risk Assessment Framework and provide support to the sector.

For further information please contact Rebecca Brown [REDACTED] or [REDACTED]

Yours sincerely

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