



Date: 29th August

Ref: End of Waste

DER framework consultation

Instant waste management is the largest family privately owned waste & recycling company in Western Australia. We have recently invested in a large waste processing Material Recovery Facility in Bayswater with further industry strategic alliances & EPA approval in place for another two processing plants in WA in the future.

We welcome the chance to become engaged in the consultation process although 8 weeks does seem a little short to be able to do the process any justice. Our State Resource Development Manager is active on the WMAA WA Branch Executive committee & in the C&D working group. He also helps the MBA, UDIA, GBCA & the HIA as a formal member of these associations & a point of contact on waste advocacy issues.

Of particular note is the typical application of recycled clean fill material manufactured (Recycled) from mixed Construction & Demolition waste streams. We would like to see a similar system to the one adopted in NSW * where a recycled fill material can be granted an exemption to the expensive testing regimes needed in WA to determine a products "waste class" under "contaminated soil testing regimes or using national or state based Health Indicator Level guidelines".

* Ref: 2011 NSW - Guidelines on Resource Recovery Exemptions (Land Application of Waste Materials as Fill).

We also have some concerns that the South Australian narrowed level of specification for recycled fill may lead to less use of these recycled materials on government projects, as the specification standard for the material is much higher than industry first expected.

We don't think that additional guidelines should be introduced if they create a more expensive journey to market for the recycled materials that they control. In a WALGA report in Feb 2013 it was stated that 6 out of the 16 metropolitan local governments didn't use recycled products due to perceived "quality" issues & "cost" concerns. A member of our C&D working group (WMAA) Colin Leek has on many occasions presented on this subject matter; using university & practical research determined that the recycled material is just as good if not better than virgin materials & its cheaper!

Given that the WMAA WA branch executive have recently written to the government on this issue, it would be pertinent to spend more time assessing Main Road's policies towards the use of recycled materials in the Main roads specification 501 .29 & attitudes in local government procurement & engineering departments before spending the tax (or should I say landfill levy) on educating & specifying materials that the private sector has been happy to use for many years across the country.

DER Question 1

a) Which waste streams should DER develop material guidelines for?

IWM Response: Fill Sand (but only to increase its use & decrease testing costs)

b) What do you think the priority order for the development of the material guidelines should be and why?

IWM Response: Fill Sand & Road base to reduce costs and increase its use. (we have a real shortage of Basic Raw Materials in WA that is affecting the ability to build houses and start projects.

DER Question 2

a) Are you willing to participate in workshops to help inform the development of material guidelines?

IWM Response: Yes

b) If so, which waste streams would you like to be involved with?

IWM Response: Road base & Fill sand

DER Question 3

How should DER's costs associated with regulating waste-derived materials be recouped from industry?

- ☐ Flat fee per application;
- ☐ Sliding fees based on the degree of work involved; or
- ☐ Some other mechanism (please specify).

IWM Response: No.

As per other WMAA consultation we have already paid our DER licence so no fee should be applied & we now bear the full costs of the increased testing regime from the recent Nov 2012 Asbestos testing guidelines.