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End-of-waste review

Department of Environment Regulation

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Draft guidance statement: Regulating the use of waste-derived materials

SITA Australia welcomes the opportunity to comment on the Department of Environment Regulation's (DER) *Draft guidance statement: Regulating the use of waste derived materials*.

We share DER's view that lack of clarity on the status of a material can inhibit resource recovery and the diversion of waste from landfill and strongly support efforts to develop guidelines to encourage the use of waste-derived materials.

About SITA Australia

SITA is the leading provider of sustainable resource recovery solutions in Australia. We find smart and reliable solutions to collect, recover and recycle waste into valuable resources to help protect our environment and make our communities more sustainable.

With over 100 operations across Australia, SITA provides weekly services to 56,000 commercial and industrial customers and more than 3.7 million residents. In addition to operating seven engineered landfills across Australia, SITA operates eight Organics Resource Recovery Facilities, three Materials Recycling Facilities, six Advanced Resource Recovery Technology (ARRT) Facilities and an Alternative Fuels ARRT.

SITA's ARRT facilities are leading the change from traditional waste disposal to economically sustainable resource recovery solutions. The Neerabup BioVision ARRT facility operated by SITA processes up to 100,000 tonnes of mixed solid waste (MSW) each year, diverting approximately 50 per cent of waste from landfill and producing high quality soil conditioner.

As a significant investor in essential waste and recycling infrastructure in WA, we consider ourselves to be in a unique position to comment on the draft guidance statement and provide practical advice as DER moves towards developing guidelines for waste-derived materials.

Developing material guidelines

SITA considers that material guidelines for waste-derived materials should be developed with a view to implementing appropriate material specifications and risk-based regulatory mechanisms while minimising unnecessary administrative burden on the waste and recycling industry.

Based on our experience in other jurisdictions, we note that the introduction of overly onerous regulatory requirements for waste-derived materials can drive up costs for waste management and resource recovery to the extent that they must be passed on to councils and business customers.

In order to achieve the ambitious recycling targets outlined in the State's *Waste Strategy* and promote investment in essential resource recovery infrastructure, it is critical that these material guidelines are realistic and do not create significant costs for operators without commensurately delivering significant environmental benefits.

With that in mind, we submit that DER should develop material guidelines for the following waste-derived materials as a priority: soil conditioners, waste-derived fuel and waste derived fill (including clean fill).

1) Soil conditioner

Using proven and specialist technologies, SITA's ARRT facilities transform household waste into compost for use on severely degraded soils. Consistent with the objectives of the *Waste Strategy* in promoting the most efficient use of resources, our ARRTs offer councils and businesses a more sustainable, higher order resource recovery solution and enable valuable resources to be diverted from landfill.

Our ARRT facility in Neerabup uses a two-stage composting system to process the Mixed Solid Waste from Mindarie Regional Council (MRC), WA's largest waste management authority. MRC is composed of seven member Councils: City of Wanneroo, City of Stirling, City of Perth, City of Joondalup, Town of Cambridge, Town of Vincent and Town of Victoria Park and SITA manages the collection, disposal and treatment of waste generated by some 500,000 residents in the area.

We produce organic composted soil conditioner at our Neerabup ARRT, carefully managing our process to ensure that the final material can effectively encourage microbial action in soils to enhance plant growth and health. Each batch of our premium soil conditioner is tested in laboratories accredited by the National Association of Testing Authorities to ensure it meets the highest standards. We are highly experienced in organic resource recovery and would welcome an opportunity to assist DER in developing material guidelines for waste-derived soil conditioner.

2) Waste-derived fuel

Waste-derived fuel is a proven technology and we believe it will play an essential role in future efforts to reduce waste and increase resource recovery. We are proud to be at the forefront of the Australian waste-derived fuel market and currently operate the country's only alternative fuel production facility in Wingfield, South Australia.

The SITA-ResourceCo Alternative Fuels facility recycles over 90% of incoming C&I and C&D waste into valuable products. It currently receives 150,000tpa of C&I and C&D waste, which is converted into 75,000tpa of Process Engineered Fuels (PEF) for use in the nearby Adelaide Brighton cement kiln.

With significant calorific value, PEF can be used as a fuel substitute for coal and gas in high combustion facilities, with environmental benefits including reductions in landfill gas emissions and use of traditional fossil fuels. Drawing on our experience in South Australia, we are currently exploring opportunities to develop a number of waste-derived fuel projects involving our ARRT portfolio and new asset developments in WA and across Australia.

It is important to acknowledge that PEF can replace the fossil fuels in industrial applications both domestically and internationally. SITA currently recovers sorts and exports PEF to other markets such as Malaysia. It will be important to ensure that this energy recovery process and the export of PEF as a product to appropriate end-uses internationally are supported by any new regulatory framework.

3) Waste-derived fill

SITA operates seven engineered landfills across Australia. Using the latest technologies and drawing on local and global expertise, our highly engineered landfills are designed to maximise the operational life of each cell and take up as little space as possible to reduce the environmental and social impacts of waste disposal.

Our landfill operations incorporate a variety of environmental protection measures including strict waste acceptance and handling procedures, base liner systems, treatment of liquid by-products from waste (leachate), collection and use of landfill gas, groundwater and surface water management, and detailed environmental monitoring and reporting. These measures meet or exceed requirements set out in the landfills' operating licenses issued by the Department of Environment Regulation.

We share DER's view that it is a priority to ensure waste derived fill is recovered for beneficial reuse and would welcome the opportunity to work with the DER in developing clear and concise guidelines for redefining waste-derived fill as a product. In particular, we would seek to ensure that any guidelines for waste-derived fill are consistent with the *Waste Avoidance and Resource Recovery (WARR) Levy Act 2007* and provide clarity in relation to how the WARR Levy Regulations should be applied and interpreted.

Participation in DER workshops

We would welcome the opportunity to participate in workshops to help inform the development of material guidelines for waste-derived materials.

We once again thank you for the opportunity to comment on the *Draft guidance statement: Regulating the use of waste derived materials*. Should you require any further information, please don't hesitate to contact myself or Luke Schepen, Corporate Affairs Manager, SITA Australia on 02 8775 5520 or luke.schepen@sita.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nial Stock'.

Nial Stock
WA State General Manager, SITA Australia