

**From:** Debbie Cameron  
**Sent:** Wednesday, 8 May 2019 2:53 PM  
**To:** ATRI-625-WasteData  
**Subject:** Written Submission - Proposed estimation / calculation methods for recycling and reprocessing facilities.....

Dear Sir / Madam,

In regard to the proposed estimation / calculation methods Consultation Paper, as a charitable recycler with 28 Op Shops throughout metropolitan and regional WA, I would provide the following feedback.

- The term “premise” probably needs more clarification in our instance. For example we have multiple sites that receive product (donated goods for resale) and sell some direct from the store but forward the balance to a central processing location, at what point are the goods recorded, and if the original site receives less than 1,000 tonnes does any of that proportion of the total received need to be reported.
- What is the definition of “waste”? The goods that are donated to op shops are not deemed as waste by the donor, nor by ourselves. The product in the stores is not recycled but is, in fact, reused in its’ original condition – should product that is being reused, be excluded from reporting?
- A similar question could be asked about the textiles that we export as the majority of these are reused, with some recycled into cleaning rags – does the reused component need reporting? If so this becomes difficult to quantify as it is all sold as is with the purchaser determining the reuse / recycle ratio.
- When commercial “skips” are used for waste removal, is it possible to do mixed waste as there is currently no process in place to separate by product category.
- The determination of opening balance stock for the commencement of the program can be done but would need to be based on a number of assumptions, with room for error.

Thank you for the opportunity to have input.

Regards

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