

To Whom it may concern.

I have just finished reading through the Draft Guideline: Submitting an application for the use of waste - derived - Materials (case-by-case determination)

If this Guideline is accepted and put in to policy I would have no choice but to close my recycling business.

The auditing requirements are just too onerous for a business to be able to bare the cost of and still be competitive with new materials. In my opinion the reason why the recycling industry has as yet been unable to get off the ground is due to the application of the environmental regulations and in particular the definition of “waste” in the Environmental protection act.

I have been through 14 years of government assessment to get my system to where it is. C4M is now starting to be accepted in a market place that I have had to develop, with no assistance from government, just road blocks. This guideline will destroy my business unless the government is willing to fund the consultants that will be required to write the documentation around the compliance to this guideline and fund the science required to adhere to it.

Natural materials can be quarried from 1 place and a business case that sets out easily defined inputs can be written so pricing is easy to maintain. Due to the sparseness of the amalgamation of materials for recycling the logistical dynamics of a business model are harder to define and therefore higher financial inputs are required for a recycling business. In the case of C4M I have been able to over come these difficulties by increasing the square meters of wall I can install in a given period by a factor of 40 over limestone, which is a major competitor. Plus the C4M wall system has a weight reduction factor of 5 over limestone which gives C4M a more sustainable transport foot print.

These two factors combined mean we can be competitive with the natural alternative with the advantage of not destroying the remaining natural environment through quarrying, strength and speed. If these guidelines that are being proposed are adopted C4M will have the cost of compliance on top of the current costs which in my opinion will make the system uncompetitive leading to the demise of the recycling opportunity.

A current example of how the Lomwest Enterprises Pty Ltd, C4M wall system can benefit the Australian Tax-payer, is a tender submission we are putting through for the City of Wanneroo for the construction of 914 lineal meters of retaining walls.

We are competing against Limestone.

Limestone cost \$990,000 and destroys the environment at the rate of 2575 cubic meters of quarried limestone

C4M cost \$920,000 saves taxpayer \$70,000, recycles 65,000 tyres and saves 13,000 cubic meters of landfill. Plus we are offering a price reduction for the collection of The City of Wanneroo's tyres that will potentially save them a further \$97,500 over 2 years. These cost savings for the collection of tyres can be used to reduce the risk of illegal dumping if passed on to the consumer.

If the government is truly interested in reducing landfill, state and federal projects need to be more heavily weighted as per the "sustainable procurement supply policy" see attached.

And the definition of "WASTE" as defined under "The Environmental Protection Act 1993", needs to be changed from:

WASTE

WASTE means: A) any discarded, rejected, abandoned, unwanted or surplus matter, whether or not intended for sale or for recycling, reprocessing, recovery or purification by a separate operation from that which produced the matter; or
B) anything declared by regulation (after consultation under section 5A) or by an environment protection policy to be waste,

Whether of value or not.

TO:

adjective

1. 1.

(of a material, substance, or by-product) eliminated or discarded as no longer useful or required after the completion of a process.

"ensure that waste materials are disposed of responsibly"

synonyms: [unwanted](#), [excess](#), [superfluous](#), left over, [scrap](#), [extra](#), [unused](#), [useless](#), [worthless](#); [unproductive](#), [unusable](#), [unprofitable](#)

"I collected two bags containing waste material"

Kind regards

Cliff Strahan
Managing Director/ Founder
Lomwest Enterprises PL

