



# City of Canning

**Our Ref:** WM.L5.1; D19/118866  
**Contact:** Anita Amprimo - (08) 9231 0749

03 September 2019

Department of Water and  
Environmental Regulation  
Locked Bag 10  
Joondalup WA 6919

Email: [wastereform@dwer.wa.gov.au](mailto:wastereform@dwer.wa.gov.au)

To whom it may concern,

## **Issues Paper: Waste Not, Want Not: Valuing Waste as a Resource**

The City of Canning (the City) appreciates the opportunity to be involved in the consultation to inform the development of a legislative framework for waste-derived materials.

The City is located 10 kilometres from the Perth CBD and has approximately 93,000 residents. The City is committed to responsible management regarding waste derived materials in all aspects of our operations.

### Background

The current Western Australian legislative framework for waste creates a level of uncertainty that inhibits the re-use of waste derived materials.

The City supports the development of a clear, risk based regulatory scheme to provide a means for beneficial re-use of waste derived materials in Western Australia.

### Definition of 'Waste'

Waste is currently very broadly defined in the three main pieces of legislation for regulating and managing Western Australia's waste, the *Environmental Protection Act 1986* (EP Act); *Waste Avoidance and Resource Recovery Act 2007* (WARR Act); and *Waste Avoidance and Resource Recovery Levy Act 2007*.

A clear indication of what is a waste and what can be considered a resource is required to ensure the avoidance of misperception, serious regulatory and cost implications as well as the promotion of a circular economy in Western Australia.

### Regulatory Pathway and Approvals Process

The Issues Paper provided a summary of three different approaches taken to the issue, in New South Wales, South Australia and Queensland.

The proposed framework for Western Australia needs to carefully consider and manage potential environmental concerns and ensure materials are safe for the specified use. These concerns need to be balanced with the need for a clear, workable and economic framework recognising the overall benefit offered by safe re-use of these materials over landfill.

A clear and simple process to apply for approval of a resource recovery product is needed to enable the identification and use of new waste derived materials. The framework should also allow users the ability to use materials that are covered under existing approvals without having to apply to the regulator.

### Waste Levy

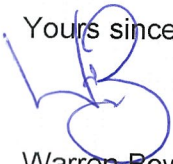
The framework should build in exemptions to the effect that ensures the Waste Levy is not applied to materials being stockpiled prior to being processed, undergoing processing, or being stockpiled awaiting use as waste derived materials.

### Circular Economy

Waste management presents both risks and opportunities. The City supports the circular economy as a guiding principle in relation to improving waste management within Western Australia and the use of waste derived materials. Finding the right balance of policy and legislative regulation requires an assessment of many competing interests. The broader environmental good, position in the waste management hierarchy, localised environmental and health concerns (such as contamination), economic opportunities and the desirability of clear, risk-based regulatory schemes are all relevant.

Should the Department wish to clarify any of the comments made above, please feel free to contact Anita Amprimo, Executive Manager Clean Canning on (08) 9231 0749 or [anita.amprimo@canning.wa.gov.au](mailto:anita.amprimo@canning.wa.gov.au)

Yours sincerely,



Warren Bow  
**Director Canning Environment**

End.