

**From:** [DGEA](#)  
**To:** [Waste Reform](#)  
**Cc:** [Hardegen, Julie](#)  
**Subject:** Department of Finance response to Issues Paper - "Waste not, want not: valuing a waste as a resource"  
**Date:** Thursday, 29 August 2019 4:57:47 PM

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Good afternoon

Thank you for the opportunity for the Department of Finance to comment on the Issues Paper – '*Waste not, want not: valuing a waste as a resource*'. Please find below the Department's response:

The Department of Finance's preference would be for the adoption of a nationally consistent approach to waste management based on the best features of each State's approach.

If a national approach is not achievable at this time, the Department favours the Queensland approach for the management of waste and waste derived resources as it appears to be the most appropriate for Western Australia.

While the intent of the South Australia legislative approach is supported in principle, it appears its risk-based assessment relies on standardised procedures without any hard criteria for the materials to be assessed. It is unclear how such an approach would work. Other concerns include that only a limited number of standards have been published to date, there appears to be a degree of 'self-determination' by industry, there are no minimum certification requirements and no clearly established monitoring or auditing processes.

The New South Wales (NSW) and Queensland approaches appear similar to each other using general/specific orders or end of waste codes and approvals respectively, to determine where a waste derived material may be considered a resource.

The NSW model appears to require both the end user (consumer) of the waste derived resource and the producer/supplier to obtain exemptions and orders respectively to use waste derived materials/products. The requirement for end users to obtain an exemption could be a disincentive to the utilisation of waste derived resources in building and infrastructure projects.

The Queensland approach appears to provide a more workable approach to the recovery and reuse of waste derived materials that would appear less onerous to industry while enabling environmental and other concerns to be addressed. This model provides a system that addresses more commonly used recovered waste while providing for limited trialling of specific and potentially under-utilised waste resources prior to issuing approval for general use.

Regards

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