



SERS
Site Environmental and
Remediation Services

Phone
1300 320 696

Email
reception@sers.net.au

04th September 2019

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup WA 6027
wastereform@dwer.wa.gov.au

Office Locations

Brisbane
95 Sandgate Road
Albion QLD 4010

Darwin
48 - 50 Smith Street
Darwin NT 0800

Melbourne
14/380 St Kilda Rd
Melbourne VIC 3004

Perth
281 Newcastle Street
Northbridge WA 6003

Sydney
5/2 Bennett Street
Mortlake NSW 2137

RE: SUBMISSION REGARDING THE ISSUES PAPER "WASTE NOT, WANT NOT: VALUING WASTE AS A RESOURCE" (DWER, 2019)

Dear Sir/Madam,

Site Environmental and Remediation Services are writing to the Department of Water and Environmental Regulation (DWER) to provide comment in relation to the recently published Issues Paper "Waste not, want not: valuing waste as a resource" (DWER, 2019).

It is requested within the issues paper to provide views on legislative framework that would be best implemented in Western Australia regarding waste and its re-use as product.

It is in SERS' opinion, as an environmental consultant of major contributors influenced by the current legislation, that the best legislation option would be a selection of implemented frameworks from South Australia and Queensland. The particular views in favour of our clients include the following:

Definition of Waste:

A definition of waste that explicitly excludes an end of waste resource managed in accordance with codes and approvals from being waste.

Standards Defining Waste Materials:

A system of 'standards' for waste-derived materials and an approved resource recovery system. Standards will be established considering that waste-derived materials are not considered to be waste. This will govern the licensing of a premises and payment of waste levies where:

- Materials are a product that meets specifications/standards published;
- Where no standard/specification is published or approved, the materials constitute a product that is 'ready and intended for imminent use without the need for further treatment to prevent any environmental harm that might result from such use'.





SERS
Site Environmental and
Remediation Services

Phone
1300 320 696

Email
reception@sers.net.au

A system of end of waste codes and end of waste approvals whereby a waste-derived material will not be considered to be waste for the purposes of legislation governing the licencing of the premises and will instead be considered an end of waste resource if it is:

- a) Managed by a registered resource producer in accordance with an end of waste code; or
- b) Managed by the holder of an end of waste approval in accordance with the approval.

Codes will include outcomes to be achieved in order for waste to be deemed a resource. Registration with the appropriate regulatory bodies in terms of providing specific recovered resources will be required. A provision will be put on resources whereby resources will be reverted back to waste when disposed of at a waste disposal site or deposited at a place or in a way that would be constitutive of general littering or illegal waste dumping.

Both processes as listed above are favourable in the opinions of our clients. Overall, it would be beneficial to have a detailed process where waste-derived materials are officially classified as recovered materials rather than waste and specifications to define the transformation.

Thank you for providing the opportunity to give comment towards this issues paper. Where any queries arise in regard to this response please do not hesitate to contact us.

Kind Regards,

Site Environmental and Remediation Services

P:+61 89220 2000 | 1300 320 696

E:reception@sers.net.au **W:** www.sers.net.au