

**From:** Joe Tuson

**Sent:** Thursday, 9 May 2019 10:55 AM

**To:** ATRI-625-WasteData

**Subject:** Proposed estimation / calculation methods for recycling and reprocessing facilities

Dear DWER

Thank you for inviting our organisation to the consultation workshop on methods for mandatory reporting of waste and recycling data and also for the opportunity to provide input to the process.

We have the following input on the consultation paper and what was understood from the workshop:

1. In section 2 of the consultation paper, the term “premises” would need to be clarified. The impression given at the workshop was that geographically separated sites would be treated as separate premises in terms of the 1,000 tonne pa threshold. Our organisation has two main processing hubs and several geographically separated other sites within the Perth metropolitan area, none of which would individually qualify. For comparison, our claim for the Charitable Recyclers Rebate (CRR) includes our total waste disposal from all our sites.
2. The same section refers to “reportable waste” and goes on to refer to “reprocessed, recycled, or recovered” material. A lot of the material that we receive and process (eg clothing, books, bric-a-brac) is sold in its original form and thus would fall under a fourth category “re-used”. This applies both to goods sold locally in Western Australia and to some of the clothing we export which could end up being sold as wearables in another country.
3. Much of our waste (as claimed under the CRR, for example) falls under the categories of “general waste” or “comingled recycling” and in both cases it is not feasible to separate into more definite categories such as wood, glass etc.. Some waste such as books, for example, is disposed of under general waste or comingled recycling depending sometimes on the capacity of available skips.
4. For the mandatory reporting regime to be successful it needs to be easy to comply with. A large part of the success of the CRR scheme has been, for our organisation, the ease of reporting because we can make use of existing reports and invoices from our waste removal contractor. The need to estimate weights of clothing and other Op Shop goods sold introduces inaccuracy. We have hundreds of thousands of books in stock awaiting sorting, sale or disposal. We do not weigh all incoming donations such as those made directly to our shops or processing hubs – we weigh only donations brought in from our charity clothing collection bins.

Best regards

**Joe Tuson**

**MANAGER PARAQUAD INDUSTRIES**



*Formerly known as Spine & Limb Foundation Inc.*