

Direct Telephone: [REDACTED]
Our ref: [REDACTED]

Project Manager
WARR Regulation Amendments
Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850

Dear Elizabeth.

SUBMISSION TO CONSULTATION PAPER - WASTE AVOIDANCE AND RESOURCE RECOVERY REGULATIONS 2008

Thank you for the opportunity to comment on the proposed amendments to the WARR Regulation 2008 requiring liable entities to report waste and recycling data.

The City has completed the DER Census for many years now and supports the proposed changes.

The compilation of the data for the census is already complex and time consuming. In mandating this function, the process should not become more difficult and require more staff resources. It is hoped that the DER will take every measure possible to simplify this task for the facility operator.

The questions you have raised in the discussion paper are answered below.

Question 1. *Are the definitions for liable entities sufficiently clear and understandable for your organisation to determine if it is required to report. If not, what further clarification would be helpful?* The definitions are clear. Please ensure that the definitions require an E-Waste or mattress recycler to report.

Question 2. *Are the indicative reporting requirements sufficiently clear for your organisation to determine what type of information it is required to report? If not, what further clarification is required?* Further clarification is not required.

Question 3. *Are there any barriers to the recording and reporting of these types of data for your organisation? If so, what are they?* The current survey takes an average of 16 management hours to complete. A simplified version of the survey is preferred.

Question 4. *Based on the indicative reporting and data requirements set out above, identify any guidance that is likely to be most useful to your organisation.* The guidance provided in the current DER Census spreadsheet is adequate.

Please contact me if you require additional information,

Yours sincerely,

[REDACTED]
[REDACTED]

For **CHARLES SULLIVAN**
Director Engineering and Works

23 August 2016