

Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850

27 May 2015
NSA:JMN

Attention: To Whom It May Concern

Dear Sirs

Provision of Comments on Draft Guideline: Submitting an Application for the Use of Waste derived Materials (Case-by-Case Determination)

Douglas Partners Pty Ltd (DP) is pleased to provide the following comments in relation to the Department of Environment Regulation's (DER's) *Draft Guideline: Submitting an Application for the Use of Waste derived Materials (Case-by-Case Determination)* [Draft Guideline, April 2015]. A review of the Draft Guideline indicates that whilst in overall terms the guideline is a practical document, consideration should be given to the following points prior to its finalisation:

- The Draft Guideline notes that if the WDM is intended for widespread use, the DER will generally require that the *USEPA Leaching Environmental Assessment Framework (LEAF)* test method 1313 should be undertaken. Enquiries with a number of commercial laboratories in Perth indicate that the majority of them are currently not set-up to carry out the LEAF test procedures and therefore the laboratories do not have NATA accreditation for the procedure. In the absence of NATA accreditation for the LEAF test methods, an auditor and/or the DER would be unable to confidently comment on the reliability of such analytical results;
- Whilst it is acknowledged that section 4.1.7 "Proposed Product Specification" of the draft guideline states that "*each waste input must meet the product specification prior to being introduced into the production process for the WDM*", a clear distinction between waste treatment processes and the WDM manufacturing processes is not apparent in the document. For clarity it would be prudent to clearly state that any waste treatment processes should be separate from the WDM manufacturing process, and that the waste material should only be introduced as an input into the WDM manufacturing process after it has been appropriately treated and suitably validated as meeting the product specification. It is considered that in the absence of such clarity, WDM manufacturers may consider a waste stabilisation/treatment process as a WDM manufacturing process.

If you have any queries on the matter, please do not hesitate to contact the undersigned.

Yours faithfully

Douglas Partners Pty Ltd



J. M. Nash
Principal