

From: Sharon Clark [REDACTED]
Sent: Monday, 25 May 2015 11:46 AM
To: End_of_Waste Project
Subject: End of Waste Review

Dear DER

Comments for your consideration:

- The guidance does not indicate which section of the DER applications should be sent to, and which will process and approve the applications. This would be useful so that initial enquiries can be made by an applicant re whether a formal application is required.
- No indicative timeframe for the processing of applications is provided. An indicative timeframe is required so that scheduling of application approvals can be incorporated into project plans.
- The guidance identifies the need to consult with other agencies before submitting an application, but does not indicate which agencies, and under which circumstances - some guidance on this would be useful, and would assist in minimising the workload of agencies such as the Department of Health, where applicants will seek its advice as a precautionary measure.
- It is apparent that the DER approach assumes all WDM is contaminated/harmful hence the highly risk averse approach taken.
- The guideline doesn't acknowledge best practice material hazards assessment processes and deconstruction techniques which would enable relatively clean recovery of materials.
- It would be beneficial if there was a less onerous assessment process for materials which are deemed to be low risk such as separately sourced concrete, brick and masonry from construction and demolition activities.
- The requirement for a screening risk assessment using a comparator is onerous for relatively inert materials like road base when locally sourced materials such as limestone and gravels are not subject to the same level of scrutiny.
- The requirement for a contaminated sites auditor to accredit an application to use WDM will add significant cost to an application.
- The costs of testing WDM to the standard required by the DER could be a disincentive to greater recycling in WA and be counterproductive in terms of achieving the State's Waste Strategy Recycling Targets.
- It is unclear whether a regulatory impact study has been completed for this policy.

Sharon Clark
Manager Environmental Services



Level 6 Wesfarmers House, 40 The Esplanade Perth Western Australia 6000

T [REDACTED] F 08 9481 0861 M W landcorp.com.au

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