

27 May 2015

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To whom it may concern

**Submission on Guideline: Submitting an application for the use of waste-derived materials
(case by case determination)**

The Association welcomes the opportunity to comment on the Guideline. As this document focuses mainly on the process that is planned for any materials, the Association only has limited comment.

The Guideline mentions that an addendum on Manufactured Fill is being developed and the Association looks forward to commenting on the detail of this document, as it has the potential to directly affect a number of the Association's members who process Construction & Demolition material.

The Association understands the need to protect the environment through a rigorous approach to understanding risks associated with the use of waste derived materials. However, there is some concern that the level of requirements, in the absence of incentives, will discourage the development of markets for materials, as they may require a high level of investment to meet the requirements of the Guidelines. Recycling material is frequently a marginal activity and if the State is committed to diverting waste from landfill, it is likely that support for the industry will be needed.

In relation to making application to the Department of Environment Regulation (DER), the Association strongly suggests that the first step in the process should be clearly identified as the proponent contacting the Department to discuss their application. This will assist the proponent in preparing a more comprehensive document and the DER in assessing a project.

For more information please contact me on [REDACTED] or email [REDACTED]

Yours sincerely



Rebecca Brown
President
WMAA (WA) Branch