

23 February 2015

Mr Jason Banks, Director General
WARR Act Review
Department of Environment Regulation
Locked Bag 33
CLOISTERS SQUARE WA 6850

Dear Mr Banks,

RE: SITA Australia's submission to the Review of *Waste Avoidance and Resource Recovery Act 2007* Discussion Paper

SITA Australia welcomes the opportunity to provide this submission on the WARR Act Review to the Department of Environment Regulation (DER). As a leader in resource recovery and with a strong presence in both collections and infrastructure in Western Australia, SITA is in a unique position to comment on the Review.

SITA is a member of the Waste Industry Alliance and is supportive of the Alliance's submission to the WARR Act Review dated 23 February 2015.

SITA finds smart and reliable solutions to collect, recover and recycle waste into valuable resources to help protect our environment and make Australian communities more sustainable.

With 100 operations across six states and territories, SITA provides weekly services to over 56,000 commercial and industrial customers and more than 3.7 million residents. In addition to seven landfills, SITA operates eight Organics resources Recovery Facilities, three Materials Recycling Facilities, six Advanced Resource Recovery Technology (ARRT) Facilities and an Alternative Fuels ARRT.

In Western Australia, SITA operates one landfill, the BioVision ARRT in Neerabup, SITA-Western Recycling and SITA-MediCollect Services as well as service centres, including the Mining and Industrial Service Centre in Kalgoorlie.

1. SITA's response to the WARR Act Review Discussion Paper

SITA agrees that Western Australia will face challenges in the waste and recycling sector over the coming years due to population growth and associated increased waste generation. In particular, SITA acknowledges the need to divert waste from landfill to reduce costs, deliver environmental benefits and provide employment opportunities.

Local government waste operations and infrastructure planning

SITA is broadly supportive of the proposal to establish statutory waste groups with compulsory local government membership which would streamline waste service procurement, and ensure waste-related decisions and operations are consistent with the statutory State waste infrastructure plans and the Waste Strategy.

SITA's view is that local councils should be required to participate in aggregated procurement of waste services in order to achieve the best economies of scale.

Future waste infrastructure needs identified in State-level waste infrastructure plans

SITA broadly supports the inclusion of future waste infrastructure needs in State-level waste infrastructure plans. However, SITA believes the private sector can deliver better, more cost effective waste services than the public sector and should be able to identify and secure future waste infrastructure sites.

Stimulating the development of major new infrastructure investments, such as waste to energy

SITA has already made significant investments in innovative resource recovery infrastructure in Western Australia, including the \$100 million Neerabup BioVision facility. SITA's ARRT facilities are leading the change from traditional waste disposal to economically sustainable resource recovery solutions. The Neerabup facility processes up to 100,000 tonnes of mixed solid waste each year, diverting approximately 50 per cent of waste from landfill and producing high quality soil conditioner.

SITA agrees that investing in new technology and developing infrastructure such as waste to energy is essential to the future of resource recovery and waste management.

The SITA-ResourceCo Processed Engineered Fuel (PEF) facility in Wingfield, South Australia is the first of its kind in Australia. This facility extracts combustible material from commercial waste streams to manufacture PEF to be used as a fuel substitute for coal and gas in high-combustion facilities. SITA continues to explore opportunities to expand this technology across the country.

In relation to waste to energy, it is important to ensure that the waste hierarchy is closely adhered to so that materials are reduced, reused and recycled before going through this process. SITA recommends that the Government stipulates this in any plans to establish a waste to energy facility in Western Australia.

Establishing new regulatory frameworks for materials derived from waste that increase their ability to compete with and replace traditional products

SITA strongly supports efforts to develop guidelines to encourage the use of waste-derived materials. Material guidelines should be risk-based and minimise any administrative burden on the sector. Overly onerous regulatory requirements for waste-derived materials can drive up costs for waste management and resource recovery. Only a regulatory framework that supports and clearly defines appropriate end uses for waste-derived materials, including levy exemption, will allow resource recovery to improve. SITA believes that soil conditioners, waste-derived fill and waste-derived fuel should be priorities.

SITA also acknowledges the consultation undertaken by the Department in 2014 and the development of the Guidance statement: Regulating the use of waste derived materials, released in November.

Improving the yield and cost-effectiveness of waste collection and processing systems and services

SITA believes that more efficient services and cost effectiveness can be best achieved through private sector ownership of waste infrastructure and provision of waste services.

Reducing the fragmentation of waste services and increasing the coordination in communications activities aimed at householders and businesses

SITA broadly supports this proposed initiative.

2. Related areas of waste reform

It is noted that a number of other potential reform opportunities outside the scope of the WARR Act Review are identified in the Discussion Paper. Although these reforms are not being considered as part of this process, SITA would like to take the opportunity to make the following brief comments:

Establishing landfill options to avoid ad hoc siting of landfills, as environmental issues have precluded new putrescible landfills on the Swan Coastal Plan

As stated above, it is SITA's view that the private sector can deliver better, more cost effective waste services than the public sector and should be freely able to identify and secure future landfill sites, with the Government supporting this system through appropriate planning frameworks.

Thank you for the opportunity to provide this submission. If you require any further information, please contact Luke Schepen, Corporate Affairs Manager on 02 8775 5520 or at luke.schepen@sita.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nial Stock', with a stylized, cursive script.

Nial Stock
State General Manager, Western Australia
SITA Australia