



Fact sheet: Waste data reporting - productive use of final products

Purpose

The purpose of this fact sheet is to:

- provide additional guidance to liable persons that treat, process or sort waste and produce recovered materials that are returned to productive use;
- explain how 'productive use' is defined for waste and recycling data reporting purposes; and
- clarify reporting obligations when recovered materials leave a site for reuse, use as uncontaminated fill, manufacturing, construction, energy recovery or export.

Annual reporting of waste and recycling data

Under regulation 18C of the WARR Regulations, anyone who is a 'liable person' is required to record and report waste and recycling data in an annual return to the Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (the department), in accordance with approved procedures.

Liable recyclers

Liable persons are defined under regulation 18B of the WARR Regulations. Recyclers should consider the following to determine if they are liable:

- reportable waste, being solid waste, is treated, processed or sorted at the premises for the purposes of reprocessing, recycling or energy recovery;
- as a result of that treatment, processing or sorting, at least 1000 tonnes of reprocessed, recycled or recovered material is produced in a financial year at the premises that:
 - needs no further processing and is ready for use as a production input or a final product; or
 - is to be exported from Western Australia.

For general information about liable recyclers, see the [waste data reporting – liable recyclers](#) fact sheet.

What is ‘productive use’?

For waste data reporting purposes, recovered materials are considered to be returned to productive use when they are used for a beneficial purpose, including:

- direct reuse
- use as an input to manufacturing
- use in construction; or
- use for energy recovery.

Recovered materials that have been processed to the point where they are suitable for these uses are commonly referred to as secondary materials.

Secondary materials are distinct from waste that requires disposal or long-term storage, and from material that remains part of an ongoing treatment or reprocessing process.

When is recovered material considered ready for productive use?

Recovered material is generally considered ready for productive use when:

- it has been processed to meet technical or specification requirements for its intended use
- it is suitable for immediate use or sale as a production input or end use product; and
- no further waste treatment or reprocessing is required before it can be productively used.

In practical terms, this often occurs at the point where material leaves a treatment, sorting or reprocessing facility for use off-site.

Types of productive use

Recovered materials leaving a facility for productive use should be classified according to their primary intended use.

Productive use category definitions and examples are provided in the table below.

Productive use category	Description and examples
Reuse	Whole products or components used again for their original (or substantially similar) purpose, without reprocessing other than minor checking, cleaning, repair or refurbishment. <i>Examples:</i> reuse of pallets, second-hand furniture, reusable containers, salvaged building components.

Productive use category	Description and examples
Uncontaminated fill	Use of inert material that meets the requirements of inert waste type 1 under the Landfill Waste Classification and Waste Definitions and is suitable for use as fill material without further processing. This category excludes asphalt, biosolids and material requiring treatment prior to use. <i>Examples:</i> clean soil, sand or clay used as fill.
Civil construction	Use of recovered materials in civil construction applications where the material provides a functional engineering purpose, such as structural support, separation or drainage. <i>Examples:</i> recovered aggregates used in roads, embankments, sub-base, drainage layers and noise walls.
Organics used for soil improvement, land rehabilitation and mulch	Use of processed organic materials to improve soil condition, support plant growth or rehabilitate land. <i>Examples:</i> compost, soil conditioners, mulches, composted biosolids.
Manufacture of new products similar to those from which the recovered material was derived	Reprocessing of recovered materials into new products of the same or similar material type, replacing virgin raw materials. <i>Examples:</i> remelting glass bottles into new glass products; metal scrap used to manufacture new metal products.
Manufacture of other products	Reprocessing of recovered materials into different products from the original material, typically with a different functional use. <i>Examples:</i> rHDPE bottles manufactured into plastic timber or pipes; glass fines used in cement products.
Fuel	Use of waste-derived materials as a fuel to generate energy, where the primary purpose is energy recovery rather than material recovery. <i>Examples:</i> refuse-derived fuel, other waste-derived fuels used in industrial furnaces or energy generation.

Reporting productive use

As a liable recycler under the WARR Regulations, you will be required to report the intended productive use for each material type recovered at your facility during the reporting period.

Recyclers are not required to report the final productive use where materials are sent to another facility for additional processing.

Reporting at the point of transfer

In many cases, recovered materials are sold or transferred to another business that uses them as an input to manufacture or other activities.

At the point where the recovered material is transferred:

- the business that processed the waste into a secondary material is responsible for reporting the productive use of the material;
- the receiving business is not required to report the transferred material as waste, where it is received as a production input rather than waste; and
- the receiving business may still have separate reporting obligations if it undertakes waste treatment activities for other materials.

Why productive use is reported

Data on productive use of recovered materials supports:

- measurement of recycling and recovery performance;
- tracking of material flows within Australia and through exports; and
- assessment of progress toward circular economy outcomes.

Accurate classification helps ensure waste data is consistent and comparable across jurisdictions.

More information

For further information about reporting waste and recycling data under regulation 18C of the WARR Regulations, please email waste.data@dwer.wa.gov.au.

Related documents

Visit our page on [waste data reporting under regulation 18C](#).

View our [Frequently Asked Questions](#) section

See our [waste data reporting liable recyclers](#) fact sheet for general information about liable recyclers.

Visit [Waste Data Online](#) to lodge annual returns under regulation 18C to the department.

Legislation

This document is provided for guidance only. It should not be relied upon to address every aspect of the relevant legislation. Please refer to the Parliamentary Counsel's Office at the Department of Justice (DoJ) for copies

of the relevant legislation, available electronically from the [Western Australian Legislation page](#) of the DoJ website.