



## Submission on the Environmental Guidelines for Organic Waste Recycling Facilities

### Introduction

This Submission has been prepared through the Municipal Waste Advisory Council (MWAC) for the Western Australian Local Government Association (the Association). The Municipal Waste Advisory Council is a standing committee of the WA Local Government Association, with delegated authority to represent the Association in all matters relating to solid waste management. This Submission therefore represents the consolidated view of Western Australia Local Government. However, individual Local Governments may have views that differ from the positions taken here.

### Introduction

This Submission is in response to the Department of Environment and Conservation *Environmental Guidelines for Organic Waste Recycling Facilities*. In commenting on these Guidelines it should be noted the position that MWAC is commenting from, on behalf of Local Government in a policy context (rather than operational).

### Definitions

The DEC draft environmental guidelines identify Household organic waste as, "source separated domestic waste". WALGA recommends that this definition be redefined as it fails to recognise organic waste as any organic waste from households, irrespective of its collection method. Furthermore, the document introduces mechanical biological treatment within the purpose of the document. WALGA recommends that this process be clearly defined in a Western Australian Context, as current biological processes within the state are non source separation composting and anaerobic digestion.

***Recommendation: that mechanical biological treatment be clearly defined in a Western Australian context, and, that household organic waste be redefined***

### Odour and gaseous emissions

Odour and gaseous emissions were identified in the document, with the desired outcome stipulating "No emissions of offensive odours are emitted outside the boundaries of the premises". This desired outcome is ambiguous in so far as it leaves open the interpretation of 'offensive'. There are no criteria for evaluation or measurement methodology.

***Recommendation; that the term "offensive odours" be removed from the document and a value given to emission odours which can be measured.***

### Reference to the Waste Avoidance and Resource Recovery (WARR) Act 2007

The Guidelines have at no stage made reference to the Waste Avoidance and Resource Recovery (WARR) Act 2007. This Act is a primary piece of legislation and as such, should be the reference point for the Guidelines. The primary objectives of the Act are:

*"To contribute to sustainability, and the protection of human health and the environment, in Western Australia and the move towards a waste-free society by*

- a) *promoting the most efficient use of resources, including resource recovery and waste avoidance: and*
- b) *reducing environmental harm, including pollution through waste: and*
- c) *the consideration of resource management options against the following hierarchy –*
  - i) *avoidance of unnecessary resource consumption*
  - ii) *resource recovery (including reuse, reprocessing, recycling and energy recovery*
  - iii) *disposal"*

The Guidelines mention 'Highest beneficial end use' however, it is considered more appropriate that resource efficiency as outlined in the WARR Act be used as a guiding principle.

***Recommendation: The Guidelines reflect resource efficiency as outlined in the WARR Act.***

### **Source Separation**

The Draft Recycled Organics Guidelines make reference to the Waste Management Board of Western Australia Position Statement on Recycled Organics, February 2008. This reference is in support of the position given in the Guidelines that source separation provides the most effective method for minimising cross-contamination in organic collection systems. The WALGA Position Paper on Standards for Recycled Organics Applied to Land recognises that a key principle for minimising the risks associated with the application of recycled organics to land must be the introduction of mandatory, equitable standards for all recycled organics. If a recycled organic product meets the standards, the source of that product is immaterial and it must be considered acceptable for land application. It is also acknowledged that if a product does not meet the standard, regardless of its source, it should not be applied to land due to the risks associated with that application. There is no suggestion that all products will be suitable for all uses.

It should also be noted that the WMB Position Paper stipulates that "single – waste sources are more likely to meet quality requirements for unrestricted use" implying that this method is preferred, however, not exhaustive.

***Recommendation: reference to source separation is removed from the document and an outcome based position adopted***

### **Existing Documents**

The Waste Management Boards Recycled Organics Position Statement is referenced within the document in relation to source separation. This paper has not been endorsed by the current Waste Authority, and as such is considered to be in draft form.

Furthermore, the AS 4454 Compost, Soil Conditioners and Mulches is used as a reference document for current operating facilities. Item 2.1.1 Compliance with national health standards states;

*"All products shall fully comply with the chemical, organic and pathogen containment provisions of the current federal or state government guidelines, whichever is the most restrictive, for use and disposal on soils of products derived from organic wastes, compostable organic materials and biosolids."*

The "West Australian Guidelines for Direct Application of Biosolids and Biosolids Products" are restrictive guidelines which classify current compost produced from facilities in WA as C2, application restricted to Agriculture, Horticulture, Forestry and Mine site rehabilitation. This document guides the end use of compost, however, they are overdue for review. As stipulated on the front of the document, the guidelines were produced as a draft, with the intention that "Once the guideline has been in operation for a period of time (probably one year), the Biosolids Working Group, comprising members from the Department of Environmental Protection, the Department of Health and the Waters and Rivers Commission, will seek comments from suppliers and users of biosolids, as well as from other interested parties, for possible revision of the guideline". The guideline was produced in February 2002, and this review process is yet to be undertaken.

Furthermore, compost Australia has developed in conjunction with SAI Global, a certification process for 'fit for purpose' compost. It is anticipated that the AWT DORF research will assist in a revision of AS 4454 with the goal of an Australian Standard fit for purpose compost. Should this outcome be achieved, and a review of both the "West Australian Guidelines for Direct Application of Biosolids and Biosolids Products" and the Waste Management Boards Recycled Organics Position Statement it is believed that there will be no requirement for these draft guidelines. Further guidelines would be an unnecessary duplication of information.

***Recommendation: the Waste Authority reviews the Waste Management Board Position Statement on Recycled Organics, a review be undertaken on the "West Australian Guidelines for Direct Land Application of Biosolids and Biosolids Products, and, the revision of AS 4454 be undertaken.***