



Mr Mike Rowe
Director General

Department of Water and Environmental Regulation
Government of Western Australia
Locked Bag 33, Cloisters Square
PERTH WA 6850

Dear Mr Rowe

SUBMISSION TO THE REVIEW OF THE ENVIRONMENTAL PROTECTION (CONTROLLED WASTE) REGULATIONS 2004

The Waste and Recycling Industry Association of Western Australia (WRIWA) represents private sector companies with direct investment in the waste, recycling and composting sectors in WA.

WRIWA members collect, process, recycle and dispose of around two thirds of the total waste produced in this State. This includes the Controlled Waste sector, where our members manage the majority of this waste in WA.

WRIWA has two broad objectives:

- to achieve best practice environmental outcomes from collection, processing, recycling and disposal of waste; and
- to ensure markets are fair and transparent, ensuring competition occurs on a “level playing field” that drives value for customers and a fair return on investment for members.

In preparing this submission, WRIWA has consulted extensively with its own member base in WA. WRIWA strongly supports the efficient and rigorous management of Controlled Waste and is committed to working with the State Government to achieve this outcome.

WRIWA supports nine of the 15 recommendations in the Discussion Paper, but we disagree with six of the recommendations.

As a general principle we disagree where we consider that the effects of the recommendations would be:

- 1) Anti competitive and give unfair commercial advantage to one sector of the Controlled Waste industry over others;
- 2) Complicate or create confusion or ambiguity;
- 3) Create untenable work restrictions that would unnecessarily raise the costs of service delivery; and/or
- 4) Does not take into account the technology that is currently being used in the industry.



We look forward to working with you and other key stakeholders to progress these issues.

WRIWA's Management Committee would be happy to meet with you at any time.

A copy of this submission has been emailed to the address indicated in the consultation paper.

Please contact Michael Bobrowicz, WRIWA Executive Officer, on 0418 190 861 or at Michael@wriwa.com if you have any queries about the attached submission.

Yours sincerely

Michael Harper
President
WRIWA
30 May 2018