

EPA Stakeholder Workshop, September 2016

Questions

Static or growing stockpiles

The Bill will empower the EPA to regulate material flow at waste sites, irrespective of materials' status as a waste or product. This will better empower the EPA to act to prevent excessive stockpiling of material.

Tables 1 and 2

- 1 The EPA has published guidelines to help it determine stockpile limits to prevent *environmental harm*. What principles do you believe the EPA should use to establish stockpile limits to protect *against market distortion* given different circumstances applying at different sites?
- 2 Do you believe different maximum stockpiling considerations, such as size & timeframes, should apply for different types of waste. For example, established recyclables vs innovative and residual materials from mixed wastes?

Table 3

- 3 If the EPA has set authorised stockpile limits at a site, in what circumstances do you consider it would be appropriate for the EPA to amend a limit?

Waste promoted as 'product' – recovered resource assessments

The EPA is currently approached with ad hoc specific waste reuse proposals – most usually as fills, aggregates or within particular developments.

The Bill will empower a formal application and assessment process to allow EPA determinations on whether or not such materials are suitable for use as an 'approved recovered resource' and charge assessment fees for this process.

Table 4

- 4 The EPA has calculated that an assessment fee of around \$7,000 would generally support expert review, legal advice and administrative processes for applications. What are your views regarding the application of such a fee for a formal assessment and approval process?
- 5 If the EPA has granted approval for a material to be used as an 'approved recovered resource', in what circumstances should it be able to vary or revoke that approval?

Waste promoted as 'product' – waste derived fill standard requirements

Table 5

- 6 Under what circumstances do you think the EPA should require chemical assessment and reporting by a consultant for reuse of waste soil from a domestic site?

Table 6

The EPA is considering that various waste soils must be sampled and assessed to confirm that there is no visible asbestos containing material to the naked eye and no detectable asbestos and trace asbestos as per the *Australian Standard AS4964–2004 Method for the Qualitative Identification of Asbestos in Bulk Samples*.

- 7 Do you think the EPA should apply the Australian Standard to determine whether asbestos is present in waste derived fills?
- 8 If the Australian Standard approach were to be used, should the EPA allow the reuse of certified 'asbestos remediated fill' at a non-sensitive site after remediation?

Recovering re-useable 'fill' materials that currently end up at landfill

Table 7

- 9 What do you think of the EPA charging the waste levy on the use of any soil or other fill in landfills beyond an excepted allowable amount for operational purposes?

Table 8

- 10 How do you think the EPA could encourage reuse of clean soils and other appropriate fill on redevelopment sites?

Table 9

- 11 How do you think cut and fill could best be managed on redevelopment sites and then tracked so it could be reused (where appropriate) offsite?

Illegal dumping

The Bill empowers the EPA to be able to require GPS tracking and to enable proactive marking of materials where illegal dumping is anticipated.

Table 10

- 12 In what circumstances should the EPA require a GPS on a vehicle suspected of illegal dumping? For example, after first offence? having regard to alleged offenders' history? how can the EPA identify vehicles to target?

Table 11

- 13 What information could the EPA access to support suspicion of future illegal dumping to be able to enter and mark material? For example, history of non-compliance? Tip-off?

Energy from Waste

Table 12

- 14 Do you consider that Energy from Waste proposals that meet EPA-nominated energy recovery requirements should attract any waste levy, and should any such levy be the same, higher or lower than the levy applying to the disposal of waste?

Further comments can be submitted by workshop participants by email to epainfo@sa.gov.au (mark subject as 'Reforming Waste Management') until COB Friday 7 October 2016