

To: Department of Water and Environmental Regulation

Re: Western Australia's Waste Avoidance and Resource Recovery Strategy 2030

6 July 2023

Introduction

AMEC appreciates the opportunity to provide a submission to the WA Government's review of the Waste Strategy, released in 2019. The feedback from this consultation process will inform the draft updated Waste Strategy, anticipated for release later in 2023. AMEC welcomes ongoing engagement.

About AMEC

The Association of Mining and Exploration Companies (AMEC) is a national industry association representing over 540 member companies across Australia, with the majority having project interests in WA. Our members are mineral explorers, emerging miners, producers, and a wide range of businesses working in and for the industry. Collectively, AMEC's member companies account for over \$100 billion of the mineral exploration and mining sector's capital value.

Mineral exploration and mining make a critical contribution to Australia's economy, directly employing over 274,000 people. In 2021/22 Industry generated a record high \$413 billion in resources exports, invested \$3.86 billion in exploration expenditure to discover the mines of the future, and collectively paid over \$63 billion in royalties and taxes.

In 2021/22, WA's minerals sector recorded \$231 billion of resources sales, with mineral exploration expenditure reaching a new high of \$2.5 billion. \$24 billion was invested to discover the mines of the future, and the state recorded an all-time high number of 157,700 workers.

Waste Strategy

General Comments

AMEC welcomes the release of the Directions Paper and this timely review into the effectiveness and operation of the Waste Strategy, which runs until 2030. Mineral explorers and miners comply with robust regulatory frameworks at all stages of the mineral exploration to mining life-cycle, including a strong focus on best-practice waste avoidance and management practices.

Waste planning, mitigation and management are regulated by the State and Commonwealth Government. It is important the Strategy effectively tracks progress of the State, recognising the robust regulatory and compliance processes industry complies with.

Strategy targets:

AMEC notes a number of targets have been set for 2025. As we are in H2 2023, and the Strategy is being updated, we question if the targets will be adjusted accordingly. Genuine progress continues to

be made, but the Strategy should consider the impacts of COVID-19 and restrictions, limiting travel and operations for the majority of 2020-2022.

Enabling infrastructure

Does enabling infrastructure include vital services such as utilities? Enabling infrastructure has been referenced as critical in allowing individuals and organisations to engage with waste management options available to them. Industry welcomes Government-developed guidance in consultation with industry, outlining examples of what can be accepted as vital services.

Local Government waste plans

Designed to bring together different aspects of local Government areas' waste management, providing a mechanism to align waste services and contracts with waste collected, these plans should be high level and enable risk-based measures to be implemented by organisations. With a variety of industries and projects in the regions, there are likely to be variances in performance against objectives of the Strategy. Industry questions if Local Government Authorities (LGAs) will report on the performance of proponents within their boundaries, and provide increased waste services as a result.

Transport, storage, processing and disposal of waste

These four factors have been highlighted in the Strategy as focus areas for the State. Industry consistently demonstrates progress against regulatory conditions relating to these considerations. However, until established markets for waste by-products are in place, waste storage and transport of this waste will continue to pose a challenge.

We welcome collaboration with Government, to explore what greater assistance can be provided by the state. We welcome further consideration of strategic locations of waste facilities in close proximity to industrial estates, which are likely to have larger waste collections than residential hubs.

Waste classifications and definitions

Page 36 of the Strategy refers to Government's intent to 'revise and publish waste classifications...' and 'review and update the regulatory framework for waste'. Industry requests engagement to ensure unintended consequences have been considered prior to revisions to existing frameworks being drafted.

We seek further clarity on these reforms, including a proposed timeline, the industry consultation plan, and how the State will align with the ongoing work of the Commonwealth to maintain consistency across legal frameworks and definitions.

Final Comment

AMEC recognises the imperative of the WA Government to provide a contemporary strategy to address waste challenges now and into the future, for the benefit of all Western Australians. Mineral explorers and miners seek to continue working collaboratively to achieve these targets, noting rigorous regulatory

frameworks are in place, to ensure effective waste management practices are adopted across the sector.

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