

4 April 2014

waste.exemptions@epa.nsw.gov.au

Manager Waste Strategy and Innovation
Environment Protection Authority
PO Box A290
SYDNEY SOUTH NSW 1232

Dear Chris

The Australian Sustainable Business Group (ASBG) welcomes the opportunity to again comment on, *The Liquid Food Waste Exemption 2014*, draft.

The [Australian Sustainable Business Group](http://www.asbg.net.au) (ASBG) is a leading environment and energy business representative body that specializes in providing the latest information, including changes to environmental legislation, regulations and policy that may impact industry, business and other organisations. We operate in NSW and Queensland and have over 130 members comprising of Australia's largest manufacturing companies. Members were fully involved in the development of this submission and ASBG thanks them for their contribution.

ASBG strives to assist regulatory agencies to prepare more efficient regulatory process, with the outcome of achieving practical, efficient, low cost solutions to achieve high environmental outcomes.

ASBG welcomes the process to facilitate the land application of food waste via a more comprehensive and updated set of Resource recovery Exemptions. As is always the case with environmental controls there is a fine line for the EPA to regulate that encourages both the resource recovery of certain waste and a reasonable level of protection environment. Our comments include:

Section 6

ASBG welcomes the changes to this section, but also wish the term "caustic or corrosive" be put into easily measured scientific terms. Under the Global Harmonised System, which is used under the Work Health and Safety Regulation 2011, it can define corrosive materials which have a pH > 11.5. This is more conservative than under the Australian Dangerous Goods Code 7th edition, which permits liquid wastes to be classed as class 8 corrosives if they have a pH > 12.5. As the concern of the EPA is on caustic (alkali) cleaning fluids and many foods are naturally acidic, therefore the focus should be on the alkali end of the scale.

Section 9.4

The issue of depth on injection was raised in our initial submission. Limiting it to 30 cm is ignoring industry practices, where members report injecting up to 50 cm. ASBG can see better environmental outcomes by permitting the injection depth to go deeper.

ASBG recommends the depth be increased to at least 50 cm.

Section 9.8

Members are concerned that a four week wait is required after any other 'exempted waste' is applied unless an investigation report is undertaken. This would be too restrictive if the other exempted waste is treated grease trap wastes. It also appears to read that each time a swap from liquid food waste to grease trap is undertaken an investigation report is required.

ASBG recommends that the section clarify the wording so that the investigation report is only required once for swapping between two exempted waste types.

Table 2

The slope of 10% is considered impractical and too limiting for many smaller farms.

ASBG recommends a slope of 18%, which is considered the maximum safe working slope for the equipment being used.

Table 3

ASBG member feedback is that the limits remain too conservative and will exclude many farms in the Sydney Basin benefiting from the subsurface injection of liquid food wastes. ASBG also notes that some of the buffer distances derive from the Biosolids Guidelines which relate to the application of sewage sludge. In general liquid food wastes by their definition will be far lower in heavy metals and pathogens than sewerage sludge.

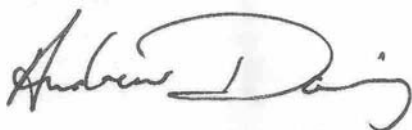
As a result ASBG recommends table 3 column 1 be amended :

- *Drinking water bores to a 50 m buffer zone*
- *Change the term "Farm driveways and fence lines" to "Neighbouring farm driveways and fence lines".*
- *Change the term "Occupied dwelling" to "Neighbouring occupied dwelling"*

ASBG looks forward to working with EPA on the above recommendations.

Should you require ASBG to clarify or elaborate on the above matter please contact me.

Yours Sincerely



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