

**WASTE MANAGEMENT REPORT
FOR
SPF DIANA AUSTRALIA PTY LTD
91 GARDINER STREET, RUTHERFORD NSW**

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Report No: 221003_WMP_Rev4
May 2022
(Released: 13 May 2022)



Benbow
ENVIRONMENTAL

Engineering a Sustainable Future for Our Environment

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DOCUMENT REVISION RECORD

Revision	Date	Description	Checked	Approved
1	18-2-2022	Draft / Rev1	L Zanotto	R T Benbow
2	25-2-2022	Draft / Rev2	L Zanotto	R T Benbow
3	2-3-2022	Draft / Rev3	L Zanotto	R T Benbow
4	13-5-2022	Rev4	L Zanotto	R T Benbow

DOCUMENT DISTRIBUTION

Revision	Issue Date	Issued To	Issued By
1	18-2-2022	SPF Diana Australia Pty Ltd	Benbow Environmental
2	25-2-2022	SPF Diana Australia Pty Ltd	Benbow Environmental
3	2-3-2022	SPF Diana Australia Pty Ltd	Benbow Environmental
4	13-5-2022	SPF Diana Australia Pty Ltd	Benbow Environmental



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Contents	Page
1. INTRODUCTION	1
1.1 Scope of Works	1
1.2 Site Location	3
2. PROPOSED SITE OPERATIONS	6
2.1 Process Description	6
2.2 Water Use	7
2.3 Hours of Operation	7
3. LEGAL AND OTHER REQUIREMENTS	8
3.3.1 NSW Waste Avoidance and Sustainable Materials Strategy 2041	8
4. WASTE CLASSIFICATION & MANAGEMENT	11
4.2 Operational Waste	12
4.5 Waste Management Plan	16
4.6 Waste Storage	16
4.7 Transport of waste	16
4.8 Odorous Waste	17
4.9 Monitoring & Records	17
4.9.1 Waste Tracking	17
4.9.2 Recording of Waste	17
4.9.3 Waste Monitoring	18
5. LIMITATIONS	19

Tables

Page

Table 1-1: SEARs	1
Table 3-1: Requirements of Part B.6 Waste Minimisation and Management under Maitland DCP	9
Table 4-1: Classes of Waste from Waste Classification Guidelines	11
Table 4-2: Operational Waste Generation	13
Table 4-3: Expected Construction Waste	15
Table 4-4: Waste Storage	16

Figures

Page

Figure 1-1: Site Location (Aerial View)	3
Figure 1-2: Aerial Photograph of the Site and Surrounds	4
Figure 1-3: Land Use Zoning Map	5

Attachments

Attachment 1: Site Waste Management and Minimisation Plan

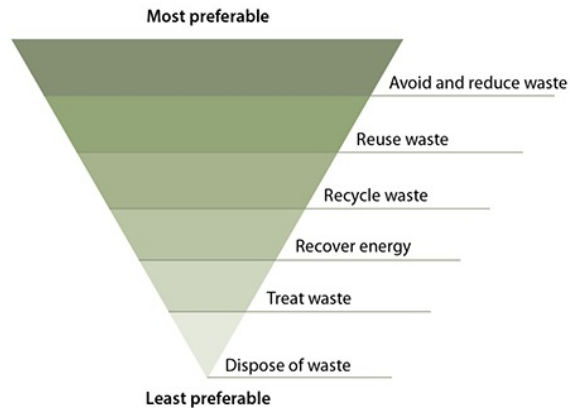




1. INTRODUCTION

This Waste Management Report documents the waste types to be received, processed and stored in relation to the proposed facility located at Lot 206, 91 Gardiner Street, Rutherford. The proposed development manufactures a liquid palatability enhancer which is a liquid petfood ingredient supplied to petfood manufacturers. Procedures for managing the waste at the facility are also described and how the facility will adhere to relevant waste legislation.

Waste management at the site would be undertaken in line with the waste hierarchy demonstrated in the following diagram:



1.1 SCOPE OF WORKS

Secretary's Environmental Assessment Requirements (SEAR) 1632. Requirements specific to waste management were provided by the Department of Planning and The NSW Environment Protection Authority. These requirements are listed in the following table and form the scope of this report.

Table 1-1: SEARs

Requirement	Comment / Section
Department of Planning Industry and Environment	
- details of the types, quantities and classification of all waste streams to be generated on site during construction and operation of the development	Section 4
- details of waste storage and handling including, transport, identification, receipt, stockpiling and quality control including off-site reuse and disposal	Section 4
- the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Waste Avoidance and Sustainable Materials Strategy 2041.	Section 3.3.1
NSW EPA	
- Identify all waste types that will be generated as a result of the proposed development during both construction and operation, their classification and the ways in which they will be legally handled, stored, transported, reused, recycled or disposed of, including sampling/monitoring, record keeping, waste tracking, contingency measures and any other verification practices, in accordance with relevant guidance/standards;	Section 4



Table 1-1: SEARs

Requirement	Comment / Section
<i>- Identify what waste streams are likely to cause odour and how that odour will be managed (may form part of any Odour Impact Assessment); and</i>	Section 4.8
<i>- Identify options and strategies for waste minimisation; reuse and recycling across all activities and processes during both construction and operational stages.</i>	Section 4

1.2 SITE LOCATION

The proposed facility will be located at Lot 206, 91 Gardiner Street, Rutherford. Figure 1-1 presents the location of the site. Figure 1-2 shows the location of the entire property to be subdivided subject to a separate development application. Figure 1-3 shows the land zoning, this site is in an IN1 general industrial zone.

Figure 1-1: Site Location (Aerial View)

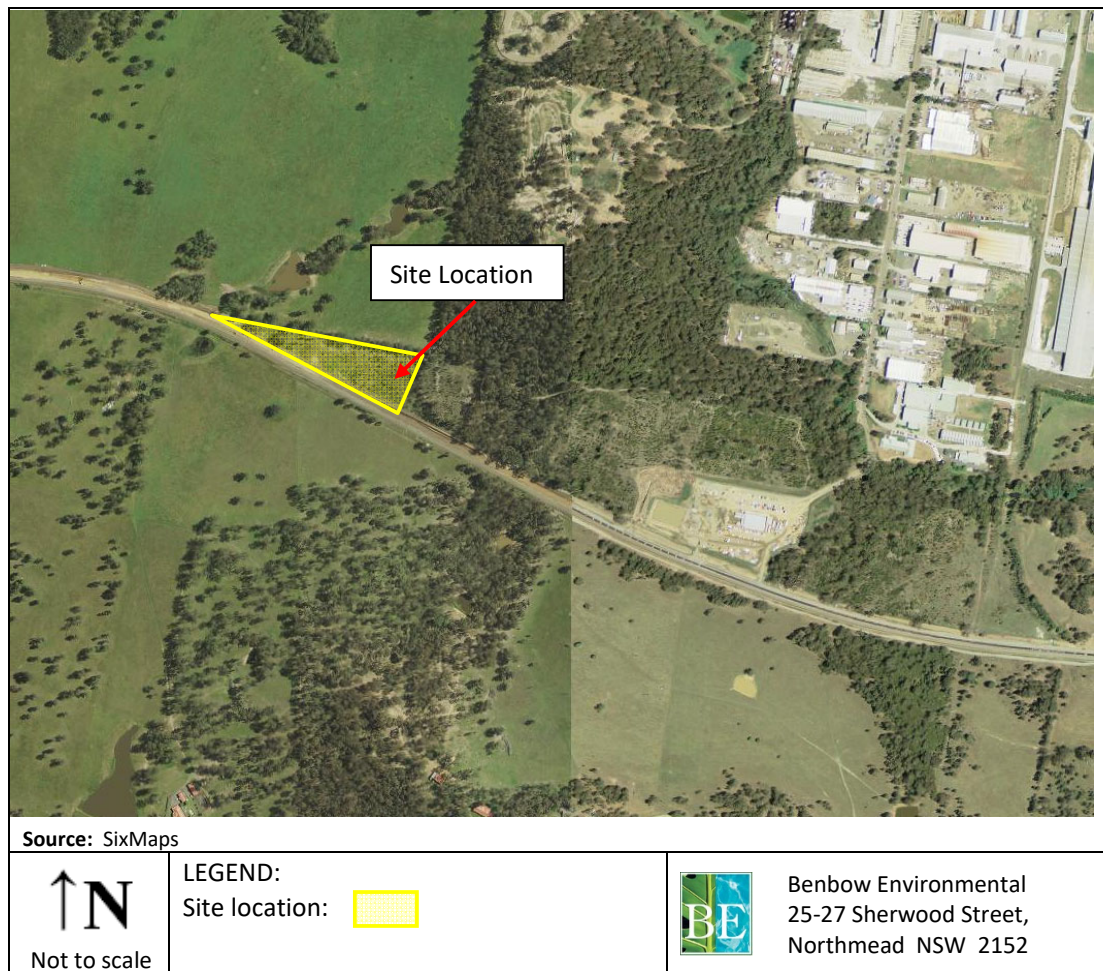
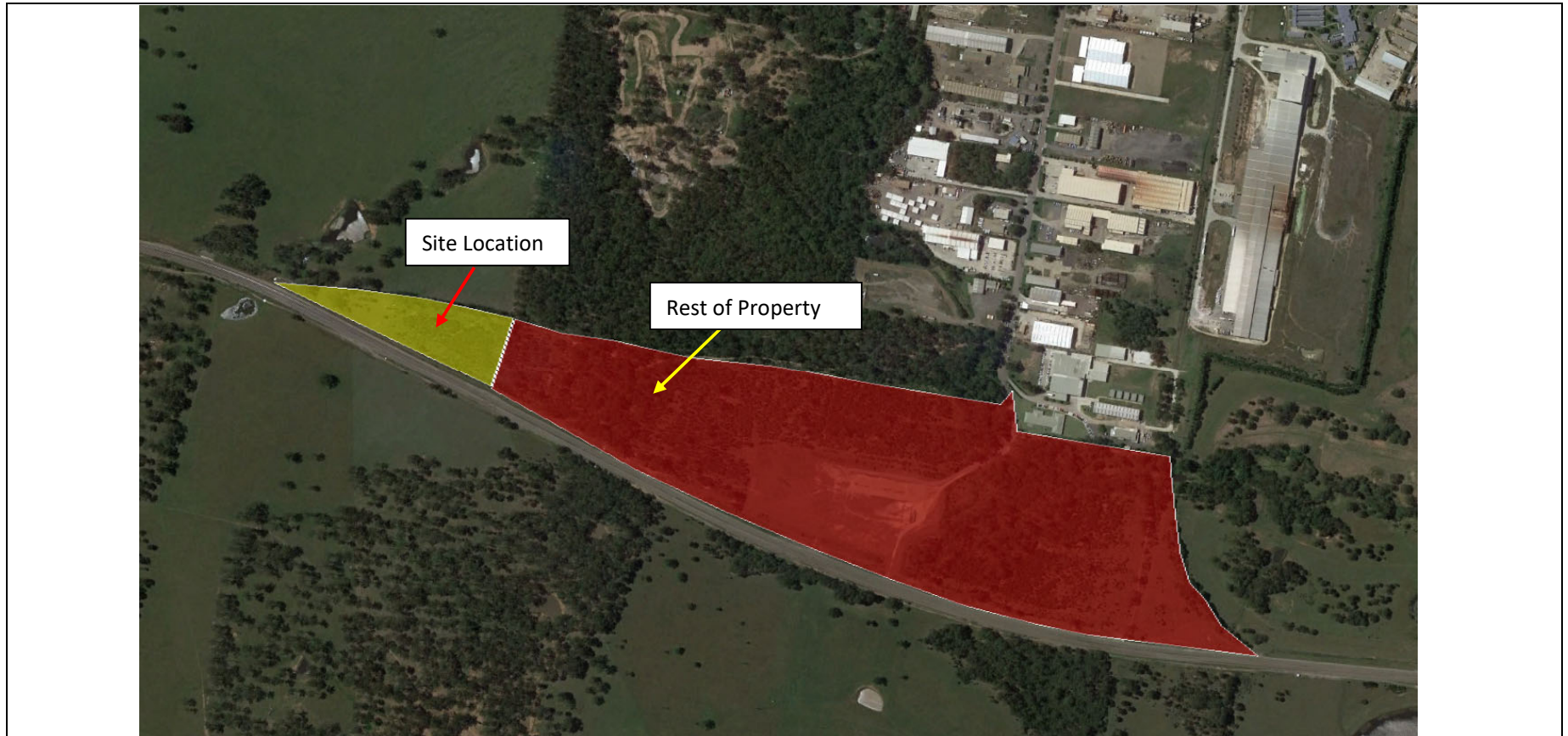


Figure 1-2: Aerial Photograph of the Site and Surrounds



Source:



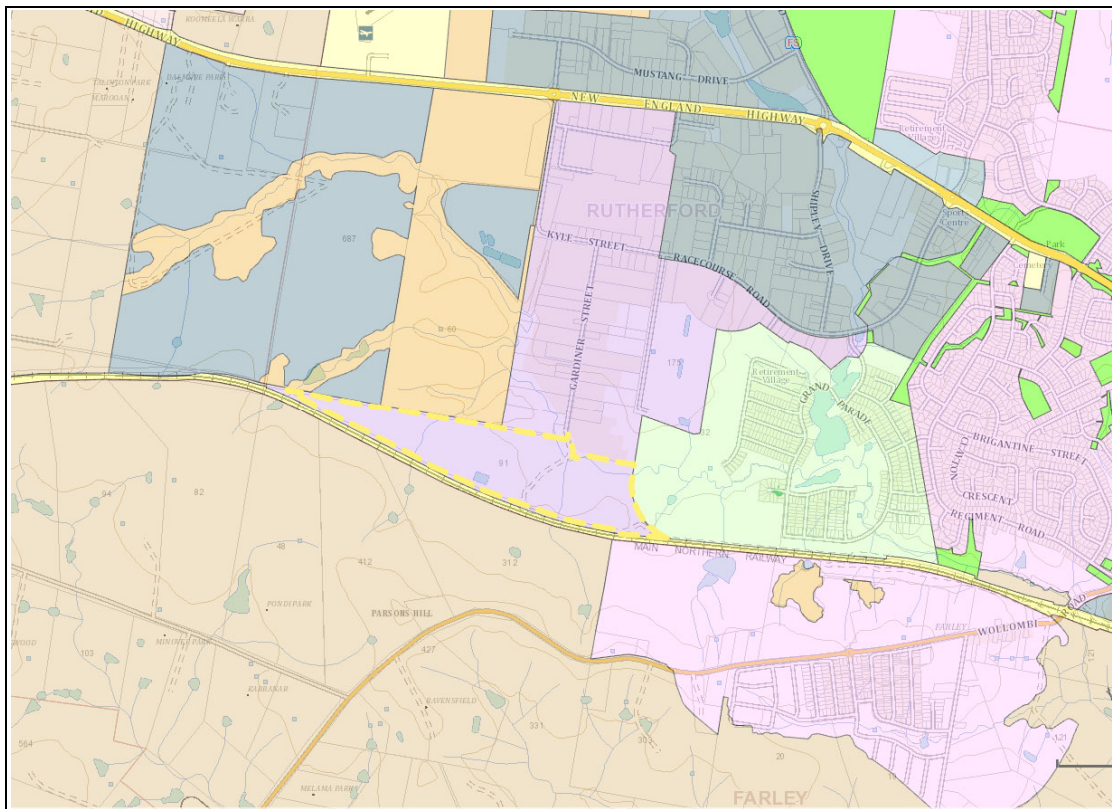
Not to scale

LEGEND:



Benbow Environmental
25-27 Sherwood Street,
Northmead NSW 2152

Figure 1-3: Land Use Zoning Map



Source: NSW ePlanning Spatial Viewer 2021

 Not to scale	LEGEND: Site Boundaries		 Benbow Environmental 25-27 Sherwood Street, Northmead NSW 2152
	Zone B1 Neighbourhood Centre B2 Local Centre B3 Commercial Core B4 Mixed Use B5 Business Development B6 Enterprise Corridor E2 Environmental Conservation E3 Environmental Management E4 Environmental Living IN1 General Industrial	R1 General Residential R5 Large Lot Residential RE1 Public Recreation RE2 Private Recreation RU1 Primary Production RU2 Rural Landscape SP1 Special Activities SP2 Infrastructure SP3 Tourist	



2. PROPOSED SITE OPERATIONS

The proposed development manufactures a liquid palatability enhancer which is a liquid petfood ingredient supplied to petfood manufacturers.

2.1 PROCESS DESCRIPTION

The process consists of:

- Receiving

Trucks arrive at the facility to drop off pallets of raw materials including:

- Beef Livers
- Chicken Livers
- Chicken Guts
- Chicken MDM (Mechanically deboned meat)
- Salmon
- Kangaroo

The packaging of the incoming material is manually removed and the raw material is transferred into plastic lined crates.

- Unfreezing (if required)

Most of the incoming material is delivered frozen. Frozen raw materials crates get moved into a tempering room (unfreezing room) which is heated with steam from the boiler.

- Grinding

Other material and frozen material once thawed gets tipped into a grinder and the resultant slurry gets transferred into a mixing tank.

- Cooking and adding ingredients

The mixing tank receives flavour additives before being transferred to the heated processing tank (reactor) where the pH and temperature is controlled (pH with dosing phosphoric acid and caustic soda) and temperature from the steam from the boiler. Strict control of these parameters are necessary for the efficacy of the enzymes which are added as a powder manually via a hatch at the top of the tank. The enzymes and temperature liquify the slurry. Typical temperature of the liquid is 100°C, and max is 130°C.

- Sifting

This liquid is then sifted (screened using a vibrating screen) which removes solids such as bits of bone etc (material that the enzymes cannot break down) which is transferred directly into a bin as solid waste which is removed offsite by a licensed waste contractor.

- Transfer to storage tanks

The product is cooled to 40°C transferred to bulk storage tanks where it is either decanted into IBCs BIBs Pallecons or Drums (mostly IBCs) or it is unloaded directly from the bulk storage via a tanker truck.

- Quarantine (if required)

Some of the products are quarantined for a designated period within the facility.



2.2 WATER USE

The majority of water is used for cleaning purposes, some of the water is also added into the product. The cleaning water ends up as wastewater to be processed in the site's waste water treatment plant before being discharged to trade waste.

Water is fed to a boiler which generates steam. This steam is used for cleaning, in the cooking process and for heating the tempering room (unfreezing room).

2.3 HOURS OF OPERATION

The proposed development will operate 24/7.



3. LEGAL AND OTHER REQUIREMENTS

3.1 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997

The *Protection of the Environment Operations Act 1997* (POEO Act) is the principal environmental protection legislation for NSW. It defines 'waste' for regulatory purposes and establishes management and licensing requirements for waste. It defines offences relating to waste and sets penalties.

3.2 PROTECTION OF THE ENVIRONMENT OPERATIONS (WASTE) REGULATION 2014

The *Protection of the Environment Operations (Waste) Regulation 2014*, referred to as the 'Waste Regulation', identifies provisions relating to waste management and disposal. Part 4 of the *Waste Regulation* details the requirements associated with tracking waste. Certain types of waste listed in Schedule 1 of the *Waste Regulation* have the potential to be harmful to the environment and are required to be tracked from the source to the waste disposal facility. The facility will not generate waste types that require tracking under the *Waste Regulation*.

Of relevance to the facility is Part 6 – Miscellaneous including general requirements relating to the transportation of waste. These requirements have been identified in Section 4.7.

Clause 112 – Requirements relating to the storage of waste generally

A person who stores waste on premises (whether or not the waste was produced on the premises) must ensure that it is stored in an environmentally safe manner.

The facility will need to comply with the above requirements.

3.3 WASTE AVOIDANCE AND RESOURCE RECOVERY ACT 2001

The *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) promotes waste avoidance and resource recovery to achieve a continual reduction in waste generation. Among other miscellaneous provisions, the WARR Act sets out provisions for waste strategies and programs, and industry actions for waste reduction.

Waste minimisation and resource recovery are the main goals of the facility. Practices implemented at the site are in accordance with the primary goal of the *NSW Waste Avoidance and Sustainable Materials Strategy 2041*.

Diana Pet Foods implements a formal waste follow-up handbook which seeks to optimise waste management. The company would also follow the NSW EPA's hierarchy of waste management for the management of wastes generated as a result of its ongoing operations.

3.3.1 NSW Waste Avoidance and Sustainable Materials Strategy 2041

The *NSW Waste Avoidance and Sustainable Materials Strategy 2041* sets out a strategy which focuses on three areas.



1. Meeting out future infrastructure and service needs
2. Reducing carbon emissions through better waste and material management
3. Building on work to protect the environment and human health from waste pollution

The proposed development is consistent with this strategy. The proposed wastewater treatment plant will be designed to meet the parameters of Hunter Water, to ensure the development meets their infrastructure and service constraints. The wastewater treatment facility will reduce carbon emissions by directly utilising Hunter Water infrastructure significantly reducing the number of vehicles that would be required to otherwise provide collection services. Enclosed waste storage areas allow for less frequent collection. Waste management practices are designed to protect the environment and human health as detailed in this report.

3.4 MAITLAND DEVELOPMENT CONTROL PLAN 2011 – PART B.6 WASTE NOT – SITE WASTE MINIMISATION AND MANAGEMENT

Part B.6 of the Maitland Development Control Plan 2011 relates to waste minimisation and management. Requirements relevant to the proposed development are addressed in the following table.

Table 3-1: Requirements of Part B.6 Waste Minimisation and Management under Maitland DCP

Clause	Requirement	Comment
Construction Phase		
4.1 ai.	An area shall be allocated for the storage of materials for use, recycling and disposal, giving consideration to slope, drainage, location of waterways, stormwater outlets, vegetation and access and handling requirements. Signage is to be incorporated into this area in order for the clear definition of the space.	The site is relatively flat sloping gently downwards towards the rear. Construction waste storage areas will be located in the NE corner of the site.
ii.	Waste and recycling materials are to be separated. Signage shall clearly indicate which bins or disposal units are for waste and those for recycling.	Separate clearly labelled bins will be provided for separate waste streams.
iii.	Measures are to be implemented to prevent damage by the elements, health and odour risks, and windborne litter.	The majority of waste will be stored in designated waste bins. Stockpiled materials will be managed to minimise environmental impacts.
iv.	The use of prefabricated components and recycled materials should be considered when possible.	Noted.
4.1bi.	A completed SWMMP (site waste management and minimisation plan) shall accompany the development application for construction for developments listed in Section 5.	Provided in Attachment 1.



Table 3-1: Requirements of Part B.6 Waste Minimisation and Management under Maitland DCP

Clause	Requirement	Comment
ii.	The SWMMP shall identify all waste likely to result from the construction process, and the opportunities for the reuse and recycling of these materials	Provided in Attachment 1.
Operational Phase – Industrial		
5.3ai.	The waste area should provide separate containers for the separation of general waste from recyclables	Designated waste bins are provided in the facility and the waste storage area.
ii.	If Council is not the provided waste contractor, then a valid contract with a licensed waste facility is to be kept by the premises or the body corporate managing the site for the collection of waste and recyclables.	A licenced waste contractor will be utilised for collection of waste and recyclables.
5.3bi.	A completed SWMMP shall accompany the development application, indicating measures for the construction phase (if required) and its ongoing use.	Provided in Attachment 1.
ii.	The SWMMP or plans submitted with the application shall show the location of onsite individual or communal waste/ recycling storage area/s or room/s of an appropriate size to accommodate waste and recycling bins, either provided by Council or by a private waste facility. These areas are to be large enough to accommodate the waste generated by the development.	Provided in Attachment 1. Waste areas are shown in the site plans.



4. WASTE CLASSIFICATION & MANAGEMENT

4.1 WASTE CLASSIFICATION

In the NSW EPA's *Waste Classification Guidelines* (2014), waste is described as:

- a) any substance whether solid, liquid or gaseous that is discharged, emitted or deposited in the environment in such volume, constituency or manner as to cause an alteration in the environment; or
- b) any discarded, rejected, unwanted, surplus or abandoned substance; or
- c) any otherwise discarded, rejected, unwanted, surplus or abandoned substance intended for sale or for recycling, reprocessing, recovery or purification.

All waste materials generated or received on the subject site must be classified into one of six different categories described the *Waste Classification Guidelines* (see table below).

Table 4-1: Classes of Waste from Waste Classification Guidelines

Class	Definitions / Examples
Special waste	<ul style="list-style-type: none"> • Clinical and related wastes; • Asbestos waste; • Waste tyres.
Liquid waste	<ul style="list-style-type: none"> • Waste that has an angle of repose <5 degrees; • Waste that becomes free flowing at or below 60°C; • Is not generally capable of being picked up by a spade or shovel.
Hazardous waste	<ul style="list-style-type: none"> • Waste with a pH ≤2 or ≥12.5; • Containers that have not been cleaned and contained dangerous goods within the meaning of the Transport of Dangerous Goods Code; • Lead-acid or nickel-cadmium batteries.
Restricted solid waste	<ul style="list-style-type: none"> • This type of waste is determined by chemical tests.
General solid waste (putrescible)	<ul style="list-style-type: none"> • Waste from litter bins collected by local councils; • Animal waste and food waste; • Grit or screenings from sewage treatment systems that have been dewatered so that the grit of screenings do not contain free liquids.
General solid waste (non-putrescible)	<ul style="list-style-type: none"> • Paper or cardboard; • Glass, plastic, rubber, plasterboard, ceramic, bricks, concrete or metal; • Grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices and/or stormwater management systems, that has been dewatered so that they do not contain free liquids

Waste associated with the proposed development is classified in the following section.



4.2 OPERATIONAL WASTE

The expected type, quantity, onsite management, and offsite destination of wastes generated by the proposed facility are estimated in the following tables. The expected waste classification of each waste type is provided. Waste classifications would be confirmed by licensed waste contractors following commencement of operations in accordance with the *Waste Classification Guidelines*.



Table 4-2: Operational Waste Generation

Waste Type	Estimated Maximum Quantity	EPA Waste Classification ¹	Management
Sifting Solids	460 tpa	General soil waste (putrescible)	Picked up by licensed waste contractor (Veolia) and transported to a composting facility.
Pallets	30 tpa	General soil waste (non-putrescible)	Typically picked up to be reused by raw material supplier. Otherwise picked up by pallet reuse company.
WWTP DAF Sludge	1,500 tpa	Liquid waste	Picked up by licenced waste contractor. The licensed waste contractor would test and classify the waste for the purposes of reuse and take the waste to a resource recovery facility licenced to accept the waste where the waste would be reused, likely composting.
WWTP Bioreactor Sludge	6 tpa	Liquid waste	Picked up by licenced waste contractor. The licensed waste contractor would test and classify the waste for the purposes of reuse and take the waste to a resource recovery facility licenced to accept the waste where the waste would be reused, likely composting.
WWTP Wastewater	11,000 tpa	Liquid waste	Discharged as trade wastewater to Hunter Water Sewer system under a trade waste agreement.
WWTP Solids	11 tpa	General soil waste (putrescible)	Picked up by licenced waste contractor. The licensed waste contractor would test and classify the waste for the purposes of reuse and take the waste to a resource recovery facility licenced to accept the waste where the waste would be reused, likely composting.
Blood soaked bin liners	60 tpa	General soil waste (non-putrescible)	Picked up by a licenced waste contractor and sent to landfill.
Non-recyclable offices/admin waste	10 tpa	General soil waste (non-putrescible)	Picked up by a licenced waste contractor and sent to landfill.
Non-recyclable packaging waste	100 tpa	General soil waste (non-putrescible)	Picked up by a licenced waste contractor and sent to landfill.
Cardboard packaging	30 tpa	General soil waste (non-putrescible)	Picked up by a licenced waste contractor and sent to a paper/cardboard recycling facility.



Waste Type	Estimated Maximum Quantity	EPA Waste Classification ¹	Management
Recycling office/admin waste (food and drink packaging)	1 tpa	General soil waste (non-putrescible)	Picked up by a licenced waste contractor and sent to a recycling facility.
Old IBCs/Containers	2 tpa	General soil waste (non-putrescible)	Reused on site. Otherwise picked up by licenced waste contractor for recycling.

Notes:

1. Expected Waste classification according to *Waste Classification Guidelines* provided. This will be confirmed on commencement of operations by licensed waste contractors in accordance with the Guidelines.



4.3 DEMOLITION WASTE

No demolition works are required for the proposed development.

4.4 CONSTRUCTION WASTE

Construction works would involve establishment of a concrete hardstand area, car park, internal roadways, construction of a large building and associated infrastructure. Estimations of construction waste and how this will be managed is detailed in the table below.

Table 4-3: Expected Construction Waste

Waste Type	Estimated Maximum Quantity (tonnes)	EPA Waste Classification ¹	Management
Excavation (eg soil, rock)	>2,500	General solid waste (non-putrescible)	Reused on site for cut and fill purposes.
Greenwaste	30	General solid waste (non-putrescible)	Placed in designated skip bin and transported to an authorised recycling facility
Bricks	0	General solid waste (non-putrescible)	N/A
Concrete	60	General solid waste (non-putrescible)	Placed in designated skip bin and transported to an authorised recycling facility
Timber	2	General solid waste (non-putrescible)	Placed in designated skip bin and transported to an authorised recycling facility
Plasterboard	2	General solid waste (non-putrescible)	Placed in designated skip bin and transported to an authorised recycling facility
Metals: Scrap Colorbond	40	General solid waste (non-putrescible)	Placed in designated skip bin and transported to an authorised recycling facility
Other	5	N/A	Placed in designated skip bin and removed by a licensed waste contractor.

Notes:

Waste classification according to *Waste Classification Guidelines* provided



4.5 WASTE MANAGEMENT PLAN

The Site Waste Management and Minimisation Plan provided by the Maitland City Council DCP 2015 has been prepared as Attachment 1. This addresses all waste expected to be generated during the construction and operational phases of the proposed development as described in the previous sections.

4.6 WASTE STORAGE

The waste bin storage room is located at the rear of the site adjoining the wastewater treatment plant as shown on the site plan. Waste bins are filled within the processing facility building, lidded, and transferred to this storage area. The following table details the quantity of waste stored at any one time.

Table 4-4: Waste Storage

Waste Type	Max Waste Quantity	Comments
Sifting Solids	30 t	3 x 5 m ³ bins
Pallets	1 t	Stored temporarily in receival area for pickup.
WWTP DAF Sludge	6 t	In 6,000 L sludge tank
Wastewater	60 t	In collection pits, storage tanks, dosing tanks
WWTP solids	3 t	Collected in pallet sized bin.
General solid waste (plastic bin liners etc)	12 t	3 x 3 m ³ bins
Cardboard	2 t	2 x 3 m ³ bins
Mixed Recycling	0.04 t	3 x 240 L bins
Total	114 t	

4.7 TRANSPORT OF WASTE

The transport of the waste streams accepted at the site are not required to be undertaken by licensed waste transporters as the waste is not trackable waste.

Under Part 6 of the Protection of the Environment Operations (Waste) Regulation 2014, the following is required:

- Waste must be transported in a manner that avoids the waste spilling, leaking or otherwise escaping.
- Waste must be covered during transport unless the waste consists solely of waste tyres scrap metal.
- Transport vehicles must be constructed and maintained to avoid waste spilling leaking of otherwise escaping from the vehicle.
- Any material that has been segregated for recycling must not be mixed with other waste during transportation.
- Transport of waste must abide by the proximity principle which restricts the transport of waste by road more than 150 km from its origin.



Under Section 143 of the Protection of the Environment Operations Act, 1997, waste is required to be transported to a place that can lawfully accept it.

Waste types to be transported from the site would consist solely of a single listed waste type or waste that meets the requirements of a resource recovery order.

The above requirements would be met by transporters of the waste to and from the facility.

4.8 ODOROUS WASTE

Most of the solid and liquid waste has the potential for generation of offensive odours. Odour is managed at the facility with a dedicated odour control ventilation system for the processing facility and wastewater treatment plant/waste storage room. The following waste management controls will be implemented:

- All waste bins to be closed (lidded) when not in use.
- No storage of waste outside.
- Odour control ventilation system where solid or liquid waste is collected, processed or stored is to be in proper working order.

4.9 MONITORING & RECORDS

4.9.1 Waste Tracking

The proposed facility is not expected to generate waste that needs to be tracked under the waste tracking system, Schedule 1 of the Waste Regulation. The Diana Pet Foods has procedures in place to record waste. This is described in the following section.

4.9.2 Recording of Waste

The following details will be recorded for waste generated.

- Date & time dispatched;
- Name of destination;
- Address of destination;
- Environment Protection Licence Number of destination (if applicable);
- Estimated Weight/Volume of load to two decimal places;
- Storage Bay or Bin ID No. from which the material was removed;
- Business name of waste contractor;
- Vehicle registration number;
- Name of driver; and
- Contents of load e.g.: Waste type.



4.9.3 Waste Monitoring

Wastewater will require ongoing monitoring in accordance with the trade wastewater agreement.

Monitoring of waste removed from site by licenced waste contractors will be undertaken by the licenced waste contractor in question in accordance with the NSW waste classification guidelines. All waste will be classified, and taken to a waste facility licenced to accept that waste.

This concludes the report.

A handwritten signature in blue ink, appearing to read 'EH'.

Emma Hansma
Senior Engineer

A handwritten signature in blue ink, appearing to read 'R T Benbow'.

R T Benbow
Principal Consultant



5. LIMITATIONS

Our services for this project are carried out in accordance with our current professional standards for site assessment investigations. No guarantees are either expressed or implied.

This report has been prepared solely for the use of SPF Diana Australia Pty Ltd, as per our agreement for providing environmental services. Only SPF Diana Australia Pty Ltd is entitled to rely upon the findings in the report within the scope of work described in this report. Otherwise, no responsibility is accepted for the use of any part of the report by another in any other context or for any other purpose.

Although all due care has been taken in the preparation of this study, no warranty is given, nor liability accepted (except that otherwise required by law) in relation to any of the information contained within this document. We accept no responsibility for the accuracy of any data or information provided to us by SPF Diana Australia Pty Ltd for the purposes of preparing this report.

Any opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal advice.

ATTACHMENTS

Attachment 1: Site Waste Management and Minimisation Plan

Outline of Proposal

Site Address Lot 206, 91 Gardiner Street
Rutherford

Applicant Name Diana Pet Food Australia

Applicant Address _____

Building and other structures currently on the site
None

Brief description of the proposal
Construction and operation of liquid pet food
ingredient manufacturing facility.

Construction Phase

DESTINATION

Waste materials on site	Vol (m ³)	Wt (t)	ON SITE	OFF SITE	DISPOSAL
			Specify proposed reuse or on-site recycling methods	Specify contractor and recycling outlet	Specify Contractor and Landfill Site
Excavation Material		2,500	Reused on site as cut and fill		
Garden Waste		30		Greenwaste recycling contractor	
Bricks		0			
Tiles		0			
Concrete		60		Concrete recycling contractor	
Timber – pine, particle board		2		Timber recycling contractor	
Plasterboard		2			skip bin contractor
Metal – copper, aluminium		40		Metal recycler	
Asbestos – cement, roof and wall		0			
Other – including glass, doors, etc		5			skip bin contractor



Ongoing Operations Phase

Ongoing Operations - Option 1

(applies to the following types of development)

- Single dwellings
- Dual Occupancy and Medium Density Housing – Individual Storage Areas
- Construction of outbuildings, such as garages, carports and sheds
- Dwelling alterations and additions
- Fences and retaining walls
- Swimming Pools
- Water Tanks
- Proposals involving minor construction
- Change of use applications involving minimal construction

Who is going to collect the waste and recycling generated by this development?
(tick applicable)

- Council General Waste Collection (Green bin)
- Council Recycling Collection (Yellow bin)
- Private Contractor Council

Ongoing Operations - Option 2

(applies to all development excluding those categories nominated under Option 1 above)

Describe how you intend to ensure ongoing management of waste on site

1. see report: ~~221003~~ 221003 - WMP
2. _____
3. _____
4. _____
5. _____
6. _____

