Public consultation

Public consultation – Draft General Beneficial Use Approval for use of a resource—Biosolids

This template can be used to provide feedback on the draft general approval for the use of a resource – Biosolids.

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| **Reviewer[[1]](#footnote-1)** *(optional)***:** | Rob Fearon, Queensland Water Directorate. Membership body for Queensland Water and Sewerage Service Providers. This response integrates responses and discussions with members from across the state. | |
| **Reference to section of the approval** | **Summary of issues** | **Comments** |
| Condition numbering | Typos in condition numbers and referencing conditions | Needs editing in several places |
| Condition 9 | Needs to clarify the different roles involved and their responsibilities (see comments). There is confusion between the role of the STP Operator, third-party contractors and the agricultural facility with respect to waste ‘generator’ and ‘user’. When does ‘waste’ become a ‘resource’ and what happens if this occurs off-site (from the STP) which is necessary in many cases? Typically, the third party contractor could be considered the Resource Generator and Resource User, but this BUA is oriented towards STP operators (who typically have no direct role in classifying, handling, delivering or applying the resource). | In many cases in Qld, Biosolids are created at an STP and regularly collected in small batches by a third party waste contractor for either disposal or reuse. Biosolids may be stored temporarily on-site but for large STPs there is generally no storage with waste bins collected regularly to avoid stockpiling and odour issues. The contractor may store and mix biosolids from different sites and will assess the quality of pooled batches and potential for application in agriculture. There is no capacity in many STPs to store and assess biosolids prior to leaving the STP. |
| Condition 11 | As above if storage, mixing, pooling or distribution of biosolids occurs prior to application then there may be multiple dates of delivery (and destinations) for any given volume of biosolids. | STP operators have no information about specific volumes and destinations as this is managed and recorded independently by the waste contractor. |
| Conditions 13-20 | These conditions make sense only if they apply to the third-party contractor rather than the STP operator. Is this the intention? | For example, condition 15 requires sampling of every 120 dry tonnes of resource but biosolids are typically removed from large STPs regularly and in small volumes to avoid odour issues. Sampling any one of these small volumes would not be representative and is routinely performed by contractors on stockpiled (and possibly) mixed batches of biosolids off-site. |
| Condition 31 | Typo “greater than” rather than “less than” |  |
| Condition 36 | Should read “Any excess **resource** (following application) are ….” |  |
| New resource conditions/limits appear to be contrary to the aim of increasing safe reuse. | Several included limits/requirements may reduce the reuse of biosolids dramatically across the state. Has specific consultation/research been undertaken to validate these generic requirements? | Queried limits:  Table 3 – Total organic Fluorine and TOPA (not regularly recorded at present in many places)  Table 4 – enteric viruses and helminth ova (Grade B is equivalent to Grade A).  Condition 31b - No application within Q100 mapped areas (excludes large tracts of arable land that are already heavily fertilised using other methods). |
| Process | How is a Waste Code generated out of this process and has the industry been consulted on the change? | More information on what will happen after December 2018 is needed to clarify this document and the change process. |
| Process | It appears that this General BUA and all specific BUAs will expire by December 2018 leaving the industry unsure of what requirements will be following this date. | The stated aim of the process is “For Queensland to become a national leader in avoiding unnecessary consumption and waste generation by adopting innovative resource recovery approaches”. In contrast to this aim, many of the legislative changes will likely act against reuse of biosolids, a practice that is well managed and recognised universally as beneficial practice (across Queensland and internationally). |

Submissions and comments can be sent by email to: [ISRS.Consultation@ehp.qld.gov.au](mailto:ISRS.Consultation@ehp.qld.gov.au) or by mail to:

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1. For queries about privacy matters email [privacy@ehp.qld.gov.au](mailto:privacy@ehp.qld.gov.au) or telephone: (07) 3330 6270 [↑](#footnote-ref-1)