

## Appendix 5. Australian Recyclers Accreditation Program Guide

**Australian Council of Recycling**

**Australian Recyclers Accreditation Program**

**DRAFT**

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## 1 Introduction

### 1.1 Program aim

The aim of the Australian Recyclers Accreditation Program (ARAP) is to provide assurance around the legitimacy of the recycling and resource recovery sector, ensuring user confidence for consumers and strengthening the overall management of reputational risk for the industry.

ARAP has been designed to support Australian recyclers activities with respect to accountability and transparency, with a key priority to boost stakeholder, community and investor confidence within the industry.

ARAP is intended to support the Australian recycling and resource recovery sector, and it is designed to complement, rather than compete with existing programs and systems that raise industry standards to best practice, including ensuring:

- High standards of operational performance are met,
- The program complements any arrangements to regulatory obligations, and
- There is continual improvement in processing standards and recovery rates.

The specific objectives of the scheme are to:

- Improve and enhance recycling and resource recovery activities across Australia.
- Increase the amount of recyclate used and therefore recycled content in the manufacture of new products from recovered materials.
- Support the industry to adopt best practice risk management for protection of the environment and human health and safety.

The program has been designed to assist the Australian Council of Recycling (ACOR) to achieve its vision and mission as follows:

ACOR's vision is to be:

- A transformed Australian economy where resource recovery is core to driving optimal environmental, social and economic benefits and
- To be trusted as a leading association that proactively represents a \$20 billion future-facing industry through innovative public policy contributions and practical advancement projects.

ACOR's mission is to:

- Maximise resource efficiency and sustainable materials management, and their benefits, across the Australian economy by advancing the resource recovery, recycling and recycled content product manufacturing supply chain
- Positively and innovatively contribute to public policy discussion and decision-making on behalf of ACOR members and
- Conduct practical advancement projects for optimal resource recovery and the advancement of ACOR members and our sector.

### 1.2 Program performance measures

A key intended outcome of ARAP is to support the continual improvement in standards and recovery rates for the Australian recycling and recovery industry as a whole. In this regard the overall measurement of ARAP is focussed on intended program outcomes covering both improved recycling and best practice risk management practices.

Overall performance of ARAP will be measured as follows:

<b>Objective</b>	<b>Industry Involvement</b>	<b>Measures</b>
Improve and enhance recycling and resource recovery	Recyclers and Material Recovery Facilities (MRF's) involved in the recycling and recovery of a wide variety of waste materials as well as containers and organic materials	Increase in the proportion (%) of material recycled Decrease in the proportion (%) of waste sent to landfill Reduction in the proportion (%) of contamination in recovered and recycled materials
Increase recycled content of new products	Operations involved in the manufacture of products from recovered recycle:	Increase in the proportion (%) of recycled content in new products Increase in the number of products made wholly from 100% recycled materials Reduction in the number of products made wholly from 100% virgin materials. Decrease in the proportion (%) of waste sent to landfill
Best practice risk management for protection of the environment and human health and safety	All ARAP accredited recycling participants	Conformance with ARAP operating requirements as specified in Section 4 of this guide document.

**1.3 Document purpose**

The purpose of this document is to present the program structure as well as the basis for accrediting recycling organisations based on their overall operations and potential risks relating to, but not limited to, the following:

- Fire protection and fire safety
- Systems and procedures for collection, separation, and dispatch of recyclable materials.
- Recyclable materials storage management
- Chemical storage
- Emergency management and first response
- Site access and security
- Equipment maintenance and use
- Incident assessment and reporting
- Employee engagement and training

Participation in ARAP involves an audit process of recycler sites compliance with regulations involving permits, licenses and insurances. Audits also involve a review of relevant regulator and stakeholder involvement and how the site and operations adhere to codes of practice and employment laws.

**1.4 Program scope**

ARAP involves site-based accreditation of ACOR member recycling and resource recovery operations, and has been designed to cover operational areas and activities including:

- a) The collection and transport of recyclable materials from the Australian domestic (MSW), commercial and industrial (C&I), and construction and demolition (C&D) sources and sectors.
- b) Primary sorting, dismantling, pre-treatment and storage of recyclable materials.
- c) Secondary sorting and reprocessing of recyclable materials.
- d) Downstream sale and distribution of recyclable materials.
- e) Remanufacture of recovered / recyclable materials into recycled content products (RCPs).
- f) Management of supply chain relationships including local transport and export partners such as brokers and sellers of recovered recyclable materials.

**2 Program Principles**

The core principles of ARAP are founded on the expectation that participants implement systems and processes that make certain legal and regulatory obligations are met, including national and jurisdictional laws relating to:

- Waste management, including waste transport and receipt of materials; storage and processing of waste material; product stewardship for priority waste materials; materials re-use; and disposal.
- Identifying and managing risks posed to the environment and human health.
- Verification of materials recycling, including monitoring: recycled content and contamination rates; materials traceability (e.g. using chain of custody or other materials tracking systems); and downstream assessments for materials reuse and final disposal.

**3 Definitions and acronyms (TO BE COMPLETED)**

For the purpose of this program the following definitions and acronyms apply:

Term	Definitions
ACOR	Australian Council of Recycling
Participant	ACOR member organisation that has successfully applied and has attained accreditation.
Recycled products	Materials processed for further and beneficial re-use.
Recycling	The process of recovering constituent components or materials for re-use.
Waste	Material received or collected by participants for the purpose of recycling.
Waste to landfill	Residual material from the process of recycling that cannot economically be re-used and can be legally disposed to landfill.

**4 Operating Requirements for Participants**

Participants of ARAP are committed to managing legitimate businesses that demonstrate compliance with regulations and have in place systems and processes to manage risk across all areas of their operations. ARAP accredited businesses are required to commit to:

- Collecting and beneficially managing materials from the residential, commercial, industrial, and major infrastructure sectors.
- Sorting and remanufacturing recyclate into new products.
- Maintaining effective tracking systems that demonstrate and verify materials use and recycling.

Conformance with the following requirements are crucial to confirm participants are committed to working toward best practice recycling.

### 4.1 Risk management

Accepted management practice involves a structured approach to controlling risks and preventing harm to human health and the environment. Risk management systems must be prepared in a manner that complies with all legal obligations and support operations to meet stakeholder and community expectations.

It is an ARAP requirement that participants put in place accepted risk management systems and processes that consider all areas of operations as outlined in Section 1.3 Program Scope.

### 4.2 Materials tracking and verifying materials recycling

ARAP participants are required to have in place systems and procedures to monitor materials in and out of their facilities. This includes making certain verification processes establish that all waste materials are transported and managed legally. Participants are to ensure:

- Waste materials and recycled products are stored, transported and treated in an environmentally appropriate manner.
- Only those facilities that have adequate treatment and disposal methods receive wastes.
- Steps are in place to prevent illegal waste management activities.
- Systems used provide for full transparency of accountability for materials tracking.

Participant may manage tracking and verification through involvement with established and regulated product stewardship schemes such as the National Television and Computer Recycling Scheme, or voluntary schemes such as Paintback and the Tyre Product Stewardship Scheme.

For waste materials and recycled products that fall outside of established schemes it is incumbent on participants to track and monitor:

- **Waste materials received** - including keeping records of quantities and sources of materials received.
- **Waste materials and recycled products stored on site** – including a method for determining daily stock levels.
- **Recycled products dispatched from site** - ensuring that quantities of products are tracked, and receiving companies are identified.
- **Materials leaving site and destined for export to international markets** – maintaining records and evidence to verify downstream vendor locations, and end use locations for either waste materials or recycled products, either direct to customers or through brokers and agents.
- **Waste to landfill** – including maintaining evidence of quantities and material types.

### 4.3 Site requirements

ARAP participants must take steps to demonstrate best practice management and conformance with the following aspects:

#### 4.3.1 Fire protection

The site operator must ensure that resources and appropriate equipment are available to separate material or smother a fire in the event of a fire emergency. Appropriate fire protection and firefighting equipment must also be installed and maintained in accordance with the Building Code of Australia and all relevant Australian Standards for fire protection and detection systems, including:

- Automatic fire detection and alarm systems (AS 1603:2018)
- Routine service of fire protection systems and equipment (AS 1851:2012)
- Portable Fire Extinguishers and Fire Blankets: Selection and Location (AS 2444:2001)
- Portable fire extinguishers - Classification, rating and performance testing (AS/NZS 1850:2009)
- Fire hydrant installations System design, installation and commissioning (AS 2419.1:2017)
- Fixed fire protection installations – pumpset systems (AS2941:2013)

- Automatic fire sprinkler systems (AS2118.1:2017)
- Inspect and test emergency lighting systems (AS 2293.3, ASNZS 2293.2:2019)
- In-service safety inspection and testing of electrical equipment (AS3760:2010)

#### 4.3.2 Fire safety

Maintain and provide an up to date fire risk management plan that outlines:

- Fire risks identified, including risk management strategies.
- Essential Fire Safety Measures provisions in accordance with those outlined in the Building Code of Australia (BCA) adhered to (as outline in 3.3.1 above).
- Site is located outside of a Bushfire Protected Area (BFA) or separation from boundaries for storage are adequate.
- No ignition sources in close proximity to flammable/combustible materials observed on-site.
- Documented control procedures including (hot works permit system) in place and used.
- Storage of flammable/hazardous wastes within 30 m of combustible materials across the site.
- No smoking zones are identified and used.

#### 4.3.3 Systems and procedures for collection, separation, and dispatch.

Participants are to have in place effective systems and procedures to monitor material flows into and out of the site, including:

- A record keeping system to manage the records for the licences and permits of management partners, contractors, suppliers, and transporters.
- Maintaining systems and procedures for tracking invoices and consignment notes as evidence for materials transactions.
- Maintain weighbridge data systems to monitor materials movement in and out of the facility.
- Maintain records for monitoring materials sorting and separation on site, including monitoring potential contamination of materials streams.

#### 4.3.4 Storage management

Ensure that materials are stored within relevant limits, e.g. regulations volumes or pile sizes, best practice standards, or in accordance with relevant guidelines and regulations. Participants must ensure that documented storage procedures are maintained and current, including procedures for:

- Monitoring the quantities and volume of material stored on-site on a daily basis.
- Maintaining material storage within designated locations, including adequate buffers and distances are maintained daily.
- Separation of material by type in accordance with best practice or regulatory storage requirements
- Litter removal and dust suppression and management.
- Housekeeping is monitored and maintained to acceptable and safe standards.

#### 4.3.5 Chemical storage

Demonstrate that procedures are in place that ensure incompatible materials are separated using safety cabinets for the storage of toxic, reactive and flammable substances, including those that may be dropped off illegally at the site.

Safety cabinets must meet applicable Australian standards and regulations, and incompatible materials must be separated. It is recommended that these safety cabinets be kept in a separate area out of sight from the main drop-off area to discourage un-solicited drop off of these materials.

Where required, site operations are to ensure that Hazchem and Dangerous goods documentation, including

safety datasheets (SDS), are displayed.

#### 4.3.6 Emergency management and first response

Operating sites are to ensure that:

- Emergency response plans are displayed in a prominent location onsite and updated through a process of regular review.
- First response fire safety equipment and emergency lighting are provided throughout the processing and storage areas.
- Emergency scenario procedures and training such as evacuation drills, firefighting drills, spill response are in place.
- Appropriate training on the use, limitations and maintenance of the first aid firefighting equipment is provided
- The emergency response plan has been provided to the local fire service for review and approval.

#### 4.3.7 Site access and security

Participant site operations are to ensure:

- Clear entrance points to enable fire services access.
- More than one opposing access point available at the site.
- Adequate site fencing and lockable gates have been installed.
- Adequate security arrangements are in place including security patrols, security lighting, alarms, and CCTV.

#### 4.3.8 Equipment maintenance and use

Participant sites should have in place procedures and processes to ensure regular inspection and maintenance of mobile equipment and plant, including:

- Regular inspection of electrical equipment/machinery and vehicles are undertaken.
- Electrical system testing and tagging in accordance with AS/NZS 3760:2010
- Regular maintenance regimes are in place
- Equipment pre-start, start and shut down procedures in place
- Ensuring documented Standard Operating Procedures (SOPs) are in place for equipment maintenance and use, including equipment isolation (Lock Out / Tag Out).

#### 4.3.9 Incident assessment and reporting

Recycler sites must have an implemented incident assessment and reporting program in place incorporating a risk assessment and controls. It is expected that incident assessment and reporting will include a process of consultation with staff on any potential health and safety issues, and investigations covering:

- Hazard identification to identify any OHS risk or environmental risk.
- Determining the level of risk by assessing likelihood of a hazard occurring and possible consequences.
- Deciding on the most effective risk controls that are reasonably practicable under the circumstances
- Implementing those controls within a set timeframe, including ensuring responsibilities for action are clearly assigned.
- Reviewing your risk controls and checking that they work.

### 4.3.10 Employee engagement and training

Participants are to ensure a process of engagement and consultation with employees for safety related matters, including:

- Where relevant staff are to be included in emergency scenario procedures and training such as evacuation drills, fire emergency evacuation drills, spill response.
- Relevant safety information and procedures are readily available to staff, including safe work procedures, incident reporting and investigation.
- Consultation on safety matters are conducted regularly, including toolbox talks, with actions and outcomes from consultations documented, monitored including sign-off once actions are finalised.

## 4.4 Regulatory

### 4.4.1 Permits and licences

- Current EPA licence (where applicable) with conditions adhered to and current annual return.
- Relevant Local Council approvals have been obtained, with conditions adhered to.

### 4.4.2 Regulator and stakeholder involvement

Participants are to maintain an up to date register of:

- Any formal notices provided by regulatory bodies regarding regulatory compliance matters with local council requirements, Environment and Safety (e.g. EPA and Work Safe directions).
- Copies of any formal company responses to regulatory notices.
- Stakeholder communications regarding complaints, including complaints from neighbours or interest groups.

### 4.4.3 Codes of practice

- Indoor storage in accordance with Planning and Building Authority requirements (such as the Building Act 1993 and National Construction Code)
- Materials storage compliant with relevant state or territory codes of practice and guidelines (refer Attachment C for detailed listing).
- Health and safety management compliant with relevant national, state and territory codes of practice.

### 4.4.4 Employment laws

- Sites have in place policies regarding fair work and equal opportunity employment.
- Site provides an annual signed declaration to confirm the site complies with all relevant employment laws, including those specific to setting wage rates (e.g. in line with the relevant award); resolving disputes; and equal opportunity to prevent discrimination.

### 4.4.5 Insurance certificates

- Participants must maintain valid (within date) insurance certificates for key business operations, including liability insurance (public and product), equipment/plant insurance, vehicle insurance, and WorkCover insurance. Noting that WorkCover is a mandated requirement by regulation.

## 5 Program Accreditation

### 5.1 Applying for accreditation

Recyclers seeking to apply for ARAP accreditation may do so by applying to ACOR in writing. Application forms may be downloaded at [www.acor.org.au](http://www.acor.org.au). Part of the application process involves agreeing to participate in an accreditation audit.

ACOR will assess applications will arrange a site inspection and accreditation audit with an ACOR appointed auditor.

### 5.2 Accreditation audit

The purpose of an accreditation audit is to verify an applicant's conformance with the principles and operating requirements of ARAP. The scope of an accreditation audit involves the areas of operations outlined in the Audit Assessment Tool (refer Attachment B).

It is expected that applicants will assist in the audit process by providing auditors access to information and data as required, including allowing for a guided site inspection.

In situations where an audit identifies a non-conformance, which are accepted by the applicant, the site operator must agree to undertake remedial action within the required time stated in the audit report. Rectification shall be at the applicant's own cost.

### 5.3 Accreditation approval

Approvals for ARAP accreditation remain solely with ACOR and will be decided based on the outcomes of accreditation audits.

Notification of the application outcomes will be provided to applicants in writing.

Successful applications will receive a certificate of accreditation confirming their participation status in ARAP and will be recognised as an ARAP accredited business on the public section of the ACOR website.

## 6 Maintaining Accreditation

To maintain ARAP accreditation status, participants must agree to the following: involvement with ongoing audits and inspections; monthly provision of information and data verifying recycling performance; and, taking action to resolve any non-conformance issues that may be identified (e.g. through conformance auditing and inspections).

Detailed requirements for maintaining accreditation are outlined as follows.

### 6.1 Conformance auditing

ARAP participation will require an annual conformance audit by an ACOR appointed auditor. ACOR will arrange for audits to be conducted at the cost of the accredited entity.

ACOR reserves the right to initiate audits on a more frequent basis including unannounced audits. More frequent or unannounced audits may be deemed as necessary for circumstances of non-conformance with ARAP operating requirements and considered high risk.

Participants are expected to address and resolve any non-conformances identified through the audit process. Noting that rectification shall be at the Participants own cost.

### 6.2 Monitoring and reporting

Participants are required to provide monthly reports that verify of recycling performance and on-site storage of materials. Information collected will be used solely for ARAP and confidentiality and privacy are paramount. All information and data about businesses and organisations accredited and/or associated with ARAP will be treated with the strictest confidence.

ARAP participants are required to provide the following information to ACOR, or a representative of ACOR, monthly:

- Quantities of waste materials received.
- Quantities of recycled products dispatched to Australian markets.
- Quantities of recycled products exported to overseas markets.
- Details of companies receiving recycled products, both in Australia and overseas.
- Quantities of waste material disposed to landfill.
- Quantities of recycled products stored on-site.
- Any regulatory involvement, including legal, OHS, and environmental incidents.

A template spreadsheet will be provided to participants to capture the information.

### 6.3 General accreditation program commitments

Accredited entities are required to ensure that they work in the best interest of ACOR as well as assisting ACOR to achieve its vision and mission and contribute to the environmental benefits of the recycling and resource recovery sector in Australia.

## 7 Suspension of Accreditation

Suspension is a temporary status and it is expected that recyclers will regain accreditation status by resolving any non-conformance issues and fulfilling the applicable program requirements. There are two categories of suspension as follows:

### 7.1 Non-voluntary suspension

Non-voluntary suspension may be enacted by ACOR for the following reasons:

- Audit reporting identifies a participant as having a high risk of non-conformance.
- Participants refusing to co-operate or be involved with the audit process or failing to resolve high risk non-conformances in a timely manner (in accordance with agreed plans of action).
- In these cases, facilities are identified as under 'non-voluntary suspension'.

It is expected that participants under non-voluntary suspension will either be expected to regain accreditation status, or subsequently the accreditation will be cancelled.

### 7.2 Voluntary suspension

At their own request participants may request ACOR to suspend accreditation where the facility is unable to meet accreditation requirements. These participants are identified as under 'voluntary suspension'.

Participants may remain under 'voluntary suspension' for a period of up to twelve months, after which an audit for conformance is to be conducted.

## 8 Accreditation Cancellation

ACOR may, at its discretion, cancel an entities participation in ARAP that are under 'non-voluntary suspension'.

Accredited participants may choose to cancel membership by providing ACOR written notice with 30 days' notice of the intention to cancel.

## 9 Confidentiality

All information provided by a participant in connection with an enquiry or an application for accreditation and all information obtained in connection with an audit assessment, is treated as confidential by ACOR staff, auditors, and Committee and Board members.

All such personnel are made aware of this requirement and have signed confidentiality agreements.

Attachment A: Risk matrix

Risk Level	Program Conformance Description	Action Required
Conformance Achieved	Current operations conform with the requirements of Australian Recyclers Accreditation Program.	No further actions needed.
Low Risk	Low risk is applied to a participant where an audit identifies: <ul style="list-style-type: none"> <li>• low risk findings only, and</li> <li>• there must be five or less low risk findings in total.</li> </ul>	An agreed plan of action to be established for resolving low risk non-conformances.  Site management to provide written commitment to completing actions within specified timeframes.
Medium Risk	Medium Risk is applied to a participant where an audit identifies: <ul style="list-style-type: none"> <li>• five or less medium risk findings in total; and/or,</li> <li>• six or more low risk findings.</li> </ul>	An agreed plan of action to be established for resolving non-conformances.  Site management to provide written commitment to completing actions within specified timeframes.  Site to be revisited 6 to 8 weeks following the initial audit to assess progress of actions against risks.  Consider corrective action, including escalation to high risk, if the facility has not complied with the recommendations.
High Risk	High Risk is applied to a participant where an audit identifies: <ul style="list-style-type: none"> <li>• one or more high risk finding; and/or,</li> <li>• six or more medium risk findings.</li> </ul>	Where a participant is determined to have a high risk of non-conformance: <ul style="list-style-type: none"> <li>• Require site to provide a plan of action, including timeline, to comply.</li> <li>• Consider membership suspension until high risk findings are resolved (in line with agreed plan of action).</li> </ul> For recyclers seeking accreditation: <ul style="list-style-type: none"> <li>• do not grant accreditation, and</li> <li>• consider inclusion into the program at a later date.</li> </ul>

**Attachment B: Audit Assessment Tool**

The purpose of this document is to present a framework for assessing resource recovery and recycling facilities' conformance with the Australian Recyclers Accreditation Program.

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
<p><b>Fire safety</b></p>	<p>The following documents may be requested:</p> <ul style="list-style-type: none"> <li>• Fire safety study, or equivalent</li> <li>• Operational Environment Management Plan</li> <li>• Bushfire risk assessment</li> <li>• Relevant safe work method statements</li> <li>• Hot Work Permit Procedure</li> <li>• Site storage plans, including, separation from boundaries, smoking zones and chemical storage areas.</li> </ul>	<p>Fire safety study / risk assessment identify, and document hazards completed for the site</p> <p>Essential Fire Safety Measures provisions in accordance with those outlined in the Building Code of Australia (BCA) adhered to</p> <p>Site is located outside of a Bushfire Protected Area (BFA) or separation from boundaries for storage are adequate</p> <p>No ignition sources within close proximity to flammable/combustible materials observed on-site</p> <p>Documented control procedures including (hot works permit system) in place and used</p> <p>Storage of flammable/hazardous wastes within 30 m of combustible materials across the site</p> <p>No smoking zones identified and used.</p>	<p>Inadequate assessment of the risks and adherence to essential fire safety measures indicates a high fire risk.</p> <p>Fire due to storage close to combustible sources of material</p> <p>Inadequate site control for the use of hot work equipment has the potential to result in a fire from combustible materials</p>	<p>Assessments have not been conducted</p> <p>Control procedures have not been developed or implemented</p>	<p>High</p>
				<p>Assessments have been conducted and some but not all control procedures have been developed or implemented</p>	<p>Medium</p>
				<p>Control procedures are adequate but not adopted by all site employees or there is no evidence of training in specific measures</p>	<p>Low</p>
				<p>Control procedures are adequate to the site operations</p>	<p>Conforms</p>

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
<b>Fire protection</b>	The following documents may be requested: <ul style="list-style-type: none"> <li>• Relevant fire block plans (sprinklers, hydrants, fire alarm).</li> <li>• Annual hydrant test / commissioning (e.g. annubar test to block plan specifications including</li> <li>• Annual fire safety statement, e.g. for building owner compliance in NSW.</li> <li>• Routine service test certificates for fire equipment (AS 1851:2012)</li> <li>• Routine service test certificates for electrical equipment (AS3760:2010)</li> <li>• Routine service test certificates for emergency lighting (AS 2293.3, ASNZS 2293.2:2019)</li> </ul>	Installed smoke and/or heat detectors or an early warning system.  Compliant fire hydrant, sprinkler system and/or on-site water storage appropriately maintained/tested  Machinery capable of separating material or other resources to smother a fire.  Routine service test tags and electrical test tags attached to equipment and up to date.	Inadequate fire protection may result in the spread of fire potentially resulting in a larger claim.	Fire protection equipment is absent or inadequate for the site layout and operations	High
				Fire protection has been installed but is damaged, not maintained, requires current testing or is obstructed by stored materials	Medium
				Fire protection system is adequate, but employee training records are not up to date with respect to first response activities.	Low
				Fire protection system is adequate and well maintained	Conforms

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
<p><b>Systems and procedures for collection, separation and dispatch</b></p>	<p>The following documents may be requested:</p> <ul style="list-style-type: none"> <li>Up to two months of data and evidence for collection and dispatch, including weigh bridge docketts, financial billing information or inventory databases.</li> <li>Records for monitoring material streams, including quality and contamination.</li> </ul>	<p>Registers and records readily available for materials collection and dispatch.</p> <p>Reconciled financial billing data and weigh bridge records and docketts.</p> <p>Quantities of waste sent to landfill.</p> <p>Demonstration of weigh bridge operations.</p> <p>Demonstration of materials sorting and stream monitoring systems and programs.</p> <p>Provision of current material audit reports.</p>	<p>Inadequate systems for monitoring material flows in and out of the site can result in regulatory breaches for on-site storage of materials (e.g. exceeding regulated volumes). Other conformance issues that may arise include:</p> <ul style="list-style-type: none"> <li>Incorrect billing and invoicing.</li> <li>Poor product quality e.g. contaminated streams.</li> </ul>	<p>Lack of, or inadequate, formal systems for collection, separation and dispatch.</p> <p>Site inspection identifies regulatory breaches for collection and dispatch.</p> <p>Site inspection identifies a regulation breach without appropriate planning to rectify.</p> <p>Evidence identifies unacceptably high levels of material stream contamination.</p>	<p>High</p>
				<p>Systems and processes in place and well managed, however, further development required to formalise.</p> <p>No evidence of lack of conformance.</p> <p>Product quality within expected limits, no contamination issues.</p>	<p>Medium</p>

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
				Formal documented systems are in place, requiring updating in some areas.  No evidence of lack of conformance.  Product quality within expected limits, no contamination issues.	Low
				Formal documented systems and processes are in place.  No evidence of lack of conformance.  Product quality within expected limits, no contamination issues.	Conforms
<b>Storage management</b>	The following documents may be requested: <ul style="list-style-type: none"> <li>• Storage management plans.</li> <li>• Site environmental risk register and management plans.</li> <li>• Pollution incident response plans.</li> </ul>	Inventory system to monitor the volume of material stored on-site, material storage locations and adequate buffers and distances maintained daily  Documented storage procedures and site diagrams prominently displayed	Lack of storage monitoring, adequate separation distances and documented processes including plans for the storage of materials could potentially result in fire at the site.	Storage monitoring, adequate separation distances and documented processes have not been developed or implemented	High
				Processes and procedures have been developed but material storage could be improved across the site	Medium

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
	<ul style="list-style-type: none"> <li>Site plans including designated materials storage and handling areas.</li> <li>Business continuity and closure plans</li> </ul>	<p>Separation of material by type in accordance with best practice or regulatory storage requirements</p> <p>Litter and dust removal program in place</p>		<p>Good site management including monitoring and reporting, housekeeping and storage. But employees are unaware of the correct storage processes</p>	Low
				<p>Good site management including monitoring and reporting, housekeeping and storage in accordance with best practice</p>	Conforms
<b>Chemical Storage</b>	<p>The following documents may be requested:</p> <ul style="list-style-type: none"> <li>Site chemical register, including chemical Safety Data Sheets (SDS).</li> <li>Procedures for management and use/handling of chemicals.</li> <li>Chemical collection records. Note: where relevant, e.g. for sites that operate community chemical drop off points.</li> </ul>	<p>Hazchem/ Dangerous goods documentation including safety datasheets (SDS) displayed.</p> <p>Incompatible chemicals properly segregated at the site.</p> <p>Safety cabinets in use, meet relevant Australian Standards including AS1940:2017 for flammable and combustible liquids.</p> <p>Safe work methods and procedures implemented in the workplace.</p> <p>Chemical register and SDS's displayed / readily available.</p>	<p>Inadequate hazardous chemicals storage could potentially result in fires that could spread to combustible materials.</p> <p>Chemical spills or leaks creating unsafe conditions and potentially contaminating ground or storm water systems.</p>	<p>Chemical storage is not adequate</p>	High
				<p>Chemical Storage is adequate, but some areas require improvement with respect to storage</p>	Medium
				<p>Chemical storage could be improved and SDS's obtained and displayed correctly.</p>	Low
				<p>Chemicals are stored correctly at the site</p>	Conforms

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
<b>Emergency management and first response plans</b>	The following documents may be requested: <ul style="list-style-type: none"> <li>• Site emergency response plans, including identified emergency scenarios and procedures.</li> <li>• Pollution incident response plans.</li> <li>• Emergency system training records.</li> <li>• Local fire emergency services written feedback regarding site planning (where relevant).</li> </ul>	Emergency plan that is regularly reviewed and available and displayed prominently onsite  First response fire safety equipment and emergency lighting provided throughout the processing and storage areas  Approval of the emergency plan by the local fire service.	Inadequate emergency planning indicates that the site may not be adequately prepared for a fire and indicates generally poor site management practices	No emergency management plan in place.  First response fire safety equipment is not present at the site	High
				Emergency management plan is in place but has not been reviewed by the local the local fire service.	Medium
				Emergency management plan is in place but not all employees are trained and aware of the procedures.	Low
				Emergency management plan and first response fire safety equipment is adequate for the site.	Conforms
<b>Site access and security</b>	Site access and security is reviewed during a site inspection.  No specific documents are required for an audit.	Clear entrance points to enable fire services access  More than one opposing access point available at the site.	Inability to stop site intrusion has a high potential to result in a facility fire.	The site has inadequate measures installed to restrict access.  Fire services access is restricted.	High

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
		<p>Adequate lockable site fencing has been installed</p> <p>Security guard patrols</p> <p>Out of hours security lighting, intruder alarms and CCTV</p>	<p>Inadequate access to allow fire services to gain access to the site as well as fight any fires from different angles could result in a larger fire due to inadequate response after early fire detection</p>	<p>Access is acceptable but could be improved with respect to fire services entering the site.</p> <p>Additional security features such as guard patrols, out of hours security lighting, intruder alarms and CCTV should be implemented.</p>	<p>Medium</p>
				<p>Access and security are adequate but could be improved due to previous intruder access or location of the premises</p>	<p>Low</p>
				<p>Access and security are acceptable for the location and size of the operations.</p>	<p>Conforms</p>
<p><b>Equipment maintenance and use</b></p>	<p>The following documents may be requested:</p> <ul style="list-style-type: none"> <li>Standard operating procedures, including Safe Work Method Statements for</li> </ul>	<p>Regular inspection of electrical equipment/machinery and vehicles undertaken.</p> <p>Regular maintenance regimes are in place</p>	<p>Faulty and inadequately maintained plant and equipment has the potential to create unsafe conditions for employees including the potential to</p>	<p>No regular inspection regimes have been implemented.</p> <p>Standard Operating Procedures (SOPs) have not been developed.</p>	<p>High</p>

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
	<p>equipment use and maintenance.</p> <ul style="list-style-type: none"> <li>• Pre-start, start and shut down procedures.</li> <li>• Daily safety checks of mobile plant and equipment.</li> <li>• Equipment isolation procedures (Lock Out / Tag Out).</li> <li>• Routine service test certificates for electrical equipment (AS3760:2010)</li> </ul>	<p>Equipment pre-start, start and shut down procedures in place</p> <p>Standard Operating Procedures (SOPs) are up to date and have been fully implemented</p>	<p>ignite combustible materials.</p> <p>Incorrect operation of plant and equipment has the potential to pose safety hazards and result in a fire if it is associated within processing areas.</p>	<p>Regular inspection and equipment pre-start, start and shut down procedures in place.</p> <p>Some Standard Operating Procedures (SOPs) have been developed but could be improved.</p> <p>All inspection, maintenance and other procedures are in place but not all employees are aware of the procedures</p> <p>All inspection, maintenance and other procedures are in place and adequate for the operations.</p>	<p>Medium</p> <p>Low</p> <p>Conforms</p>
<b>Incident assessment and reporting</b>	<p>The following documents may be requested:</p> <ul style="list-style-type: none"> <li>• Occupational Health and Safety Management System</li> <li>• Incident and hazard identification, reporting and assessment procedures.</li> <li>• Incident/hazard report and investigation register and records.</li> <li>• Records and documents related to significant</li> </ul>	<p>Site has an incident assessment and reporting program in place incorporating a risk assessment and controls</p>	<p>Inadequate incident assessment and reporting programs may indicate generally poor management practices</p>	<p>The site does not have any incident assessment and reporting programs in place</p> <p>The site has incident assessment and reporting programs in place, but they could be improved</p> <p>The site has incident assessment and reporting programs in place, but they are not understood or used by all employees</p>	<p>High</p> <p>Medium</p> <p>Low</p>

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
	<p>incidents within the past 12 months, including notifications where regulators have been involved (e.g. Worksafe, EPA)</p> <ul style="list-style-type: none"> <li>• Training records identifying staff have been trained in the use of the incident reporting procedure.</li> </ul>			<p>The site incident assessment and reporting program is adequate</p>	<p>Compliant</p>
<p><b>Employee engagement and training</b></p>	<p>The following documents may be requested:</p> <ul style="list-style-type: none"> <li>• Work Health and Safety consultation procedures and records.</li> <li>• Site safety systems training register and records.</li> <li>• Emergency response training records.</li> </ul>	<p>Emergency scenario procedures and training such as evacuation drills, firefighting drills, spill response in place</p> <p>Appropriate training on the use, limitations and maintenance of the first aid firefighting equipment</p> <p>Evidence of regular management and staff safety meetings, including toolbox talks.</p>	<p>Lack of employee training and site drills may not assist first response to a fire potentially resulting in a larger site fire</p>	<p>No employee training is undertaken or recorded</p>	<p>High</p>
				<p>Some employee training is undertaken however not recorded</p>	<p>Medium</p>
				<p>Employee training is undertaken but not all employees have been trained or the register is not up to date</p>	<p>Low</p>
				<p>The employee training is adequate, and the register is up to date.</p>	<p>Conforms</p>
<p><b>Permits and licenses</b></p>	<p>The following documents must be provided as part of the audit process:</p> <ul style="list-style-type: none"> <li>• Environmental licences to transport waste, receive waste and operate a</li> </ul>	<p>Site licence is current</p> <p>Annual return and reporting information up to date</p> <p>Relevant Council approvals have been obtained</p>	<p>Operations at the site may not be adequately controlled to ensure that the risk of fire is minimised.</p>	<p>Operating without a required licence or permit</p>	<p>High</p>
				<p>Licence and approvals are in the process of being lodged</p>	<p>Medium</p>

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
	resource recovery facility <ul style="list-style-type: none"> <li>• Council development applications and determination notices</li> <li>• Licence to transport waste</li> <li>• EPA annual returns</li> </ul>	Licence and other conditions have been met with respect to site operations		Licences and approvals have been issued but all conditions may not be met, or the site is operating outside of the conditions.	Low
				Licence and approvals in place and the site meet the relevant requirements	Conforms
<b>Other codes of practice and regulations</b>	Management plans demonstrating conformance with the Building Act 1993 and National Construction Code, and relevant state and territory materials storage requirements and regulations may be requested, as follows: <ul style="list-style-type: none"> <li>• <b>ACT:</b> <a href="#">Guideline for Stockpile Management</a>.</li> <li>• <b>NSW:</b> <a href="#">Fire Safety in Waste</a></li> </ul>	Indoor storage in accordance with Planning and Building Authority requirements (such as the Building Act 1993 and National Construction Code)  Outdoor storage meeting state-based regulations and guidelines requirements.	Inadequate building construction and/or performance may not be adequate to minimise the risk of fire at the site.	Assessments have not been undertaken	High
				Site is in the process of assessing relevant codes, including State based regulations and guidelines.	Medium
				Site has reviewed and understands the codes of practice and is in the process meeting the requirements	Low

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
	<p><a href="#">Facilities</a></p> <ul style="list-style-type: none"> <li>• <b>NT:</b> Fire and Emergency Regulations 1996</li> <li>• <b>QLD:</b> Fire and Emergency Services Act 1990; and Building Fire Safety Regulation 2008</li> <li>• <b>SA:</b> <a href="#">Guideline for stockpile management: Waste and waste derived products for recycling and reuse</a></li> <li>• <b>VIC:</b> <a href="#">Management and storage of combustible recyclable and waste materials – guideline</a></li> <li>• <b>WA and Tas:</b> Refer BCA, no other specified storage limits.</li> </ul>			Evidence that the site meets the necessary requirements	Conforms
<b>Regulator or involvement by other authorities, complaints from neighbours or other interest groups</b>	<p>The following documents must be provided as part of the audit process:</p> <ul style="list-style-type: none"> <li>• Any formal notices provided by regulatory bodies regarding compliance matters, including local council, EPA and Work Safe (in the past 12 months)</li> <li>• Copies of any formal company responses to</li> </ul>	<p>Site has had no environmental incidents such as spills or fires that caused environmental impacts (i.e. required reporting to authorities)</p> <p>No complaints from neighbours or interest groups</p>	<p>Environment incidents and/or regulatory non-compliance and complaints from neighbours or interest groups relating to the site may indicate generally poor management practices</p>	Environmental incidents have occurred in the past and controls have not been identified or implemented	High
				Control measures have been identified and some implemented but there is still a gap in conformance.	Medium
				Most control measures have been implemented	Low

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
	regulatory notices (in the past 12 months) <ul style="list-style-type: none"> <li>• Stakeholder communications regarding complaints, including complaints from neighbours or interest groups (in the past 12 months).</li> </ul>			Incidents have been rectified and no complaints received, or they have been addressed	Conforms
<b>Insurance</b>	The following documents must be provided, where relevant, as part of the audit process: <ul style="list-style-type: none"> <li>• Valid liability insurance certificates (public and product).</li> <li>• Valid WorkCover Insurance certificate.</li> <li>• Valid Equipment insurance certificates.</li> <li>• Valid vehicle insurance certificates</li> </ul>	The site can provide valid (within date) insurance certificates for key business operations. Noting that WorkCover is a mandated requirement by regulation.	Uninsured business activities expose the operations to significant loss, downtime, and financial distress.	Valid certificates cannot be provided for WorkCover and Liability insurance.  Site cannot demonstrate it is actively seeking insurance to cover other key operational aspects.	High
				Site can provide valid certificates for WorkCover and Liability insurance.  Site is actively seeking insurance for insurance regarding other key operational aspects.	Medium
				Valid certificates are available for WorkCover and Liability insurance  Site is seeking insurance to cover all other key operational aspects.	Low

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
				All appropriate insurance certificates are current and valid.	Conforms
<b>Employment Law</b>	<p>Site documents or company policies that may be requested include those relating to:</p> <ul style="list-style-type: none"> <li>• Fair Work, including wages rate setting and resolving disputes.</li> <li>• Equal Opportunity, including employment equality to prevent discrimination.</li> </ul>	<p>The site provides an annual declaration identifying:</p> <ul style="list-style-type: none"> <li>• Salary and wages are paid in accordance with an appropriate agreement or award (including payroll tax and superannuation).</li> <li>• The correct amount of superannuation is paid to employees in accordance with the Superannuation Guarantee Act.</li> <li>• Compliance with National Employment Standards.</li> </ul>	<p>An important characteristic of a legitimate business is to ensure that employees are not discriminated against and receive fair pay.</p> <p>Without appropriate systems a business is at risk of not meeting legal requirements for employment laws in Australia.</p>	<p>Site has not provided a copy the annual Employment Law declaration form.</p> <p>Evidence identifies non-compliances with relevant employment laws and regulations.</p> <p>Site is under investigation by regulators for breaches of employment law.</p> <p>Site has provided a partially complete declaration form and has committed to completing the declaration within a reasonable timeframe (maximum of 1 month).</p> <p>No evidence suggesting the site is breaching employment laws.</p> <p>Site has provided a complete declaration form identifying compliance.</p> <p>Site advises that policies and systems are under internal review and subject to change.</p>	<p>High</p> <p>Medium</p> <p>Low</p>

Component Area of operations	Key Audit Documents Documents that may be requested as part of the audit process	Proof of Conformance Evidence to demonstrate conformance with ARAP participant requirements	Potential Impacts Potential outcomes resulting from a non-conformance	Response Status determined based on audit findings	Risk Level of risk and priority
				Site has provided a complete declaration form identifying compliance.	Conforms
<b>Sales markets / contracts or trading history</b>	<p>For the purposes of monitoring downstream material flows the following documents may be requested (noting any commercial sensitivities will be respected and managed):</p> <ul style="list-style-type: none"> <li>• Contracts of sale or other contractual arrangements with downstream vendors.</li> <li>• Agreements with brokers or agent.</li> <li>• Evidence to verify downstream vendor locations, and end use locations for recycled materials, either direct to customers or through brokers and agents.</li> <li>• Shipping documents for up to 2 months of consignments including: bills of lading, sea waybills.</li> </ul>	<p>The site has medium to long term local and international sales contracts</p> <p>Contract terms indicate that the buyer is liable for loss or damages</p> <p>The site is selling material into stable markets where the destination country is able to accept the material for recycling</p> <p>The trading market or country is not under review with respect to receiving waste and recyclable materials</p>	<p>Short term or spot market contracts could potentially leave the site exposed with respect to sales, therefore potentially leading to the stockpiling of materials.</p> <p>Unstable markets and international reviews on waste materials for processing may also result in stockpiling</p>	The site sells on the spot market or into countries that may not be able to accept the materials for recycling	High
				The site has short term contracts in place, may potentially be liable for damage or claims from the buyer	Medium
				Local or international markets are relatively stable, however there may be some claim or loss on behalf of the seller	Low
				The destination countries or local markets are stable and contract terms are favourable to the recycler / reprocessor.	Conforms

## Attachment C. Summary of Waste Storage Regulations

### Australian Capital Territory

<b>Waste Storage</b>	<p>The ACT Environment Protection Authority published the <a href="#">Guideline for Stockpile Management</a>.</p> <p>The following stockpiling dimensions are specified in Guideline associated with stockpiling materials for use, reuse and recycling.</p> <ol style="list-style-type: none"> <li>1. maximum height of the stockpile for any type of loose material is four (4) metres</li> <li>2. maximum height of the stockpile for any type of baled material is four (4) metres or four (4) bales (whichever is lower in height)</li> <li>3. stockpile width must not exceed 20 metres for both loose and baled material of any type that is freestanding with easy access from both sides →</li> <li>4. stockpile width must not exceed 10 metres for both loose and baled material of any type that is freestanding with easy access from only one side</li> </ol> <p>Stockpile distance set out in a table in guidelines.</p>
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### New South Wales

<b>Waste Storage</b>	<p>The <a href="#">Fire and Safety NSW Guidelines</a> outline the safe storage and stockpiling of combustible waste material to minimise the likelihood of fire spread and provide separation which permits access for firefighting intervention.</p> <ul style="list-style-type: none"> <li>• The maximum height of any stockpile should not exceed 4 m</li> <li>• The uncontained vertical face of any stockpile should recede on a slope no greater than 45°</li> <li>• A separating masonry wall, revetment or pen should extend at least 1 m above the stockpile height and at least 2 m beyond the outermost stockpile edge</li> </ul> <p>There are also guidelines for temperature control including cooling, rotating and monitoring. Procedures available in the document.</p> <p><b>External Stockpiles</b></p> <ul style="list-style-type: none"> <li>• The maximum width of an external stockpile should be 20 m if fire brigade vehicle access is provided down both sides of the stockpile, and 10 m if access is provided down one side of the stockpile only</li> <li>• The maximum length of an external stockpile should be 50 m, or as determined from required minimum separation distances outlined in the guidelines.</li> </ul> <p><b>Internal Stockpiles</b></p> <ul style="list-style-type: none"> <li>• The maximum internal stockpile size in a building fitted with an automatic fire sprinkler system should be 1,000 m<sup>3</sup></li> <li>• Internal stockpiles should have a minimum of 6 m unobstructed access on each accessible side in a building fitted with an automatic fire sprinkler system, or a 10 m in a building not fitted with an automatic fire sprinkler system</li> <li>• Internal stockpiles of combustible waste material should be maintained as determined by the operations plan, and appropriate to the building size/layout, compartmentation, installed safety systems, process equipment and plant (further specifications in the guidelines.)</li> </ul>
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**Northern Territory**

<p><b>Waste Storage</b></p>	<p>As specified in the Northern Territory Fire and Emergency Regulations 1996 the occupier of land on which bulk flammable or combustible material is stored, whether loose or packed in cases, bags, bales, cartons or boxes, must ensure:</p> <ul style="list-style-type: none"> <li>• the flammable or combustible material is not stored in a way that constitutes a danger by fire; and</li> <li>• if the flammable or combustible material is stored in an enclosed building:             <ol style="list-style-type: none"> <li>I. it is stored in bays the dimensions of which do not exceed 3 m in length or width: and</li> <li>II. the top of the stack of material in each bay is at least 75 cm below the ceiling of the building; and</li> <li>III. there is a clear passageway at least 1.5 m wide between each bay; and</li> </ol> </li> <li>• the flammable or combustible material is stored not less than 4m from the boundary of the land</li> </ul> <p>The act also outlines requirements for hazard and risk identification and minimisation.</p>
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**Queensland**

<p><b>Waste Storage</b></p>	<p>No specified limits for storage, including stockpile sizes, are provided. Noting that the following Queensland Legislation is applicable:</p> <ul style="list-style-type: none"> <li>• <a href="#">Fire and Emergency Services Act 1990</a></li> <li>• <a href="#">Building Fire Safety Regulation 2008</a></li> </ul> <p>The Fire and Rescue Service Act which requires occupants of premises to ensure the risk of a fire occurring at the premises is effectively managed to mitigate the risk.</p> <p>The commissioner may require any occupier of premises to take measures for the purpose of reducing the risk of a fire occurring on the premises or reducing potential danger to persons, property or the environment in the event of a fire occurring on the premises.</p>
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**South Australia**

<p><b>Waste Storage</b></p>	<p>The <a href="#">Guideline for stockpile management: Waste and waste derived products for recycling and reuse</a> outlines the potential risks associated with the stockpiling of wastes and waste derived products and provides guidance on the appropriate and relevant controls to reduce those risks. Specifications include:</p> <ul style="list-style-type: none"> <li>• Areas between stockpiles should be kept free of obstruction and allow easy movement of emergency vehicles.</li> <li>• maximum stockpile heights for material management or resource recovery activities be in the range of 3–5 metres. The height of stockpiles should generally be lower than surrounding structures.</li> <li>• Stockpiles should generally be below fence lines when within five metres of the site boundary</li> </ul> <p>Appendix 1 identifies fire as a risk and outlines associated measures to minimise this risk for stockpiling of waste materials.</p>
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**Western Australia**

<p><b>Waste Storage</b></p>	<p>No specified limits for storage, including stockpile sizes, have been identified.</p>
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Tasmania

<b>Waste Storage</b>	No specified limits for storage, including stockpile sizes, have been identified.
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Victoria

<b>Waste Storage</b>	<p>The <a href="#">Management and storage of combustible recyclable and waste materials – guideline</a> specifies the following for storage:</p> <p>For outdoor storage, WRRFs where storage capacity is greater than 1000 tonnes or 1000 m<sup>3</sup> and where there is an annual throughput of more than 6000 tonnes can demonstrate that they meet this performance outcome by adhering to storage dimensions and distances given in figures 19 and 20. Maximum pile dimensions:</p> <ul style="list-style-type: none"> <li>• Height of 4m or 4 bales (whichever is lower)</li> <li>• Width of 20m if easily accessed from both sides, and 10m if easily accessed from one side</li> <li>• Length dependant on storage type and separation distance (calculation table in guidelines)</li> </ul> <p>For indoor storage, the guidelines provide a checklist, which include:</p> <ul style="list-style-type: none"> <li>• Pile stability is maintained either through limiting pile height or adequate bunding/shoring, and that piles are not obstructing firefighting equipment, firefighting systems or limiting firefighting access or paths of travel to exits.</li> <li>• Your overall floorspace/compartment size and volume/type of materials stored do not trigger prescriptive requirements as per the NCC.</li> <li>• The height of your storage is not blocking any sprinkler systems by leaving an adequate gap (≥ 1 m) between height of a pile and sprinkler heads. Any sprinkler system designed to deal with fires in indoor CRWM storage is compliant with AS 2118</li> </ul>
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