



Roads to Reuse: Recycler Support Scheme

A guide for construction and demolition recyclers

The Roads to Reuse Recycler Support Scheme is a Waste Authority initiative which helps producers of recycled construction and demolition products cover the costs of producing material in accordance with the *Roads to Reuse: Product Specification – recycled road base and drainage rock*.

1.0 Summary

1.1 Roads to Reuse

The Roads to Reuse (RtR) program supports the ongoing use of recycled construction and demolition (C&D) products (recycled road base and recycled drainage rock) in civil applications such as road construction. It does this by providing a comprehensive framework in which C&D recyclers can demonstrate to purchasers how their recycled products meet product specifications designed to protect human health and the environment.

RtR products must meet the [RtR Product Specification – recycled road base and recycled drainage rock](#) (RtR Product Specification).

The RtR Product Specification requires producers of recycled C&D products to:

- prepare a Materials Acceptance and Sampling Plan (MASP), which must be approved by the Waste Authority, and manage materials in accordance with the approved MASP
- undertake sampling and testing to determine whether or not recycled C&D product meets the product specification.

1.2 Accreditation

To participate in RtR, a producer must become an accredited RtR site.

To achieve accreditation, the producer must:

- register
- prepare a MASP and have this approved by the Waste Authority
- allow an initial audit
- receive approval to produce RtR material.

To maintain accreditation, the producer must:

- operate a site in accordance with the MASP
- submit to periodic audits
- sample and test material in accordance with the MASP and RtR Product Specification
- produce material that meets the RtR Product Specification
- intend to apply to move from *intensive sampling*¹ to *routine sampling* and demonstrate this with supporting evidence as soon as eligible.

Accredited RtR producers will be listed on the Waste Authority's [website](#) as a guide for purchasers.

1.3 Recycler Support Scheme

The Waste Authority's Recycler Support Scheme (RSS) helps producers cover the costs of preparing a MASP and undertaking intensive sampling and testing.

¹ Sampling frequencies 'intensive sampling' and 'routine sampling' were referred to as 'routine frequency sampling' and 'reduced frequency routine sampling' in the June 2020 and March 2021 iterations of the *Roads to Reuse Product Specification – recycled road base and recycled drainage rock*.



1.4 Independent auditing

Independent auditing will be arranged by the Department of Water and Environmental Regulation (DWER) on behalf of the Waste Authority.

Producers must allow independent auditors to audit products and procedures in accordance with the MASP and RtR Product Specification. This includes allowing audits after the site has moved to routine sampling (beyond the RSS funding period). If producers decline audits, RtR accreditation will no longer apply to the site or the material produced on the site, and a change of status may be indicated on the Waste Authority's [website](#).

2.0 Program overview

The RSS helps producers cover the cost of preparing a MASP undertaking sampling and testing in accordance with the RtR Product Specification.

2.1 Objectives

The objectives of the RSS are to:

- help C&D producers cover the cost preparing a MASP and undertaking intensive sampling and testing
- support C&D producers to transition from intensive sampling to routine sampling, subject to Waste Authority approval
- encourage the supply of recycled C&D product which meets the RtR Product Specification.

2.2 Eligibility

To be eligible to participate in RtR and to receive RSS funding, a producer must:

- hold a licence to accept and process C&D waste to produce recycled materials under Part V of the *Environmental Protection Act 1986*, and be compliant with licence conditions
- have no outstanding levy payments pursuant to the Waste Avoidance and Resource Recovery Levy Regulations 2008 (WARR Levy Regulations)
- lodge an annual return in accordance with regulation 18C of the WARR Levy Regulations, if the producer is a liable person under regulation 18B
- be in good standing with DWER and the Waste Authority.

For the purposes of this scheme, 'producer' means a person who processes, mixes, blends or otherwise incorporates C&D waste into recycled construction products.

Producers may operate anywhere in Western Australia.

2.3 Developing a MASP

The RSS will pay up to 50 per cent of the costs incurred to engage a suitably qualified person to prepare an approved MASP. The definition of a suitably qualified person is included in Section 4.3 of this guide and is also referenced in the RtR Product Specification.

2.4 Sampling and testing

The RSS will reimburse eligible producers for the cost of sampling in accordance with RtR Product Specification as follows:

- up to 26 weeks (or six months) of intensive sampling
 - this is the minimum period of sampling required before the Waste Authority will consider an application to undertake routine sampling
- up to eight weeks of additional intensive sampling, to allow the Waste Authority time to assess an application to undertake routine sampling.

To transition from intensive sampling to routine sampling, producers must (a) demonstrate that the RtR Product Specification has been consistently met over a continuous six-month period, and (b) request approval from the Waste Authority to move to routine sampling.

2.5 Independent auditing

Independent auditing will be arranged by DWER on behalf of the Waste Authority.

Two types of audits will be required for a site to establish and maintain RtR accredited status:

- **initial audit:** conducted on a one-off basis, prior to the start of intensive sampling by a producer, to determine if the site and operating procedures are set up and able to function in accordance with the approved MASP
- **periodic audits:** conducted randomly (at times and frequencies determined by the Waste Authority), once a producer has started intensive sampling, to determine if the site is operating in accordance with the MASP and whether material meets the RtR Product Specification
 - periodic audits will continue for producers approved to undertake routine sampling.

Accredited RtR producers will be listed on the Waste Authority's [website](#) as a guide for purchasers.

3.0 How to participate

3.1 Registration and MASP

3.1.1 Registration

To confirm eligibility for the RSS, producers must register their interest with the Waste Authority using the registration form (Appendix A). Eligible producers may proceed to 3.1.2 – Preparation of MASP.

3.1.2 Preparation of MASP

Eligible producers must prepare a MASP. Producers are expected to engage a suitably qualified person to develop the MASP, to ensure it adequately demonstrates compliance with the RtR Product Specification. The RSS will pay up to 50 per cent of the costs incurred to engage a suitably qualified person (see Section 3.4: Claims).

The MASP must be submitted to the Waste Authority for approval. The Waste Authority will assess the MASP and advise the producer in writing whether the application has been approved. Producers with an approved MASP may proceed to 3.2: Intensive sampling period, noting the requirements which must be met prior to production.

3.2 Intensive sampling period

3.2.1 Initial audit

Once a MASP has been approved, DWER (on behalf of the Waste Authority) will arrange for an independent auditor to conduct an initial audit (including site inspection).

After the initial audit, the producer will be provided with a template to record sampling and testing data for subsequent audits. The template is intended to help the producer collate data clearly and consistently to increase audit efficiency.

The producer will be notified in writing of the outcome of the initial audit.

3.2.2 Start RtR production (intensive sampling)

Once notified in writing by the Waste Authority that they are authorised to do so, the producer may start production in accordance with the approved MASP. The RSS will reimburse producers for the costs of intensive sampling undertaken in accordance with the approved MASP (see Section 3.4: Claims).

Intensive sampling must occur for a minimum of 26 weeks. This is to ensure that sufficient processing has occurred to show that the site can reliably produce material that meets specifications. This timeframe also gives the producer the chance to gather evidence to support an application for approval to undertake routine sampling.

The funding eligibility period begins on the date the Waste Authority notifies the producer of audit outcomes and approval to participate. If the producer chooses to delay the production of RtR material (after receiving approval from the Waste Authority to participate) the producer should contact the program manager to discuss a potential variation to the funding eligibility period start date.

3.3 Transition to routine sampling

The RSS helps producers undertake intensive sampling and testing so that a site can operate as an RtR accredited site. It is intended that once this is established, a producer can lower the frequency of sampling and testing required to maintain accreditation. The producer should aim to transition to routine sampling as part of participating in RtR.

3.3.1 Demonstrate RtR Product Specification has been met

Following the minimum of 26 weeks of intensive sampling, a producer can apply to undertake routine sampling. The producer must demonstrate that they have met the RtR Product Specification for a continuous six-month/26-week period before applying for approval to begin routine sampling from the Waste Authority.

If the analytical limits listed in Appendix 1 of the RtR Product Specification were exceeded during the 26-week period, the producer should provide explanatory material regarding exceedances or audit non-compliances and a proposed remedy. This could include additional weeks of sampling and testing at intensive rates; identification, investigation and rectification of procedural issues; re-testing or additionally testing exceeding material, etc.

3.3.2 Apply for approval to undertake routine sampling

As soon as practicable after 26 weeks of continuous intensive sampling, the producer should apply to the Waste Authority for approval to undertake routine sampling.

Producers are strongly encouraged to engage a suitably qualified person to prepare a report as part of the application to undertake routine sampling, to ensure the information submitted is fit for purpose, meets Waste Authority expectations and the obligations of the RtR Product Specification, and enables assessments within the stated time periods.

The essential criteria to include in the report are summarised in Appendix B. The application should be brief, provide the Waste Authority with assurances that an independent assessment has been made, and include appropriate evidence provided as attachments.

3.3.3 Assessment timeline

A breakdown of the 34-week funding period is provided in Figure 1 below, which outlines:

- the 26-week intensive sampling period – this begins when the producer is notified in writing that they can begin producing RtR material
- the application period to move to routine sampling – at the end of the 26-week period, the producer should prepare and apply to move to routine sampling, a process which may take between one and four weeks
- the application assessment period – once an application is received, the Waste Authority will assess its suitability, a process which may take between one and four weeks
 - if an application is not suitable, as per the criteria in the RtR Specification and outlined in Appendix B, the Waste Authority will ‘stop the clock’ while the producer amends the application (meaning that if the eight-week additional funding period is exceeded due to actions of the producer, the Waste Authority will not extend funding).

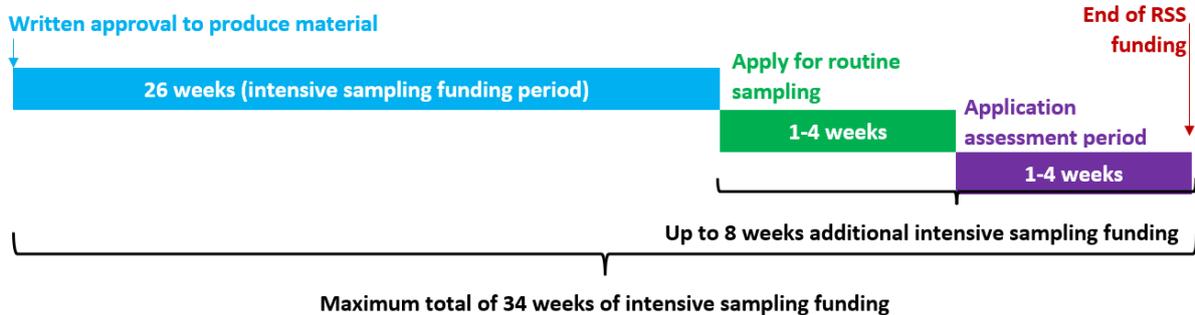


Figure 1 Assessment timeline

Producers should note the following:

- any additional payments or extensions of funding periods will be at the discretion of the Waste Authority
- it is recommended that the producer approach a suitably qualified person prior to the completion of the 26-week intensive sampling period to ensure there is sufficient time to prepare an application.

3.4 Claims

To make a claim for RSS funds, the producer must submit:

- the results of testing at appropriate intensive sampling rates undertaken in accordance with the approved MASP
- invoices and any other supporting evidence requested to substantiate expenditure (for example, records and rates of in-house staff conducting sampling).

The claim form is included in Appendix C.

Invoices for reimbursement must be addressed to the Waste Authority from the producer. The Waste Authority cannot reimburse the producer via an invoice from a third party to the producer.

The RSS is available for the costs of intensive sampling for a maximum of 34 weeks, whether or not the material meets the analytical limits listed in Appendix 1 of the Rtr Product Specification.

4.0 Funding conditions

This section of the guide provides information on:

- eligibility criteria for producers
- eligible funding items as well as conditions, inclusions and exclusions
- other general information including processes for funding claims, disputes and definitions.

4.1 Producer eligibility

See Section 2 above for eligibility criteria.

4.1.1 Genuine intent

A producer participating in the RtR must be genuinely committed to operating in line with the MASP on an ongoing basis, as much as the producer's business reasonably allows. The producer must, in good faith, intend to produce RtR compliant material consistently, and intend to transition from intensive sampling to routine sampling. The RtR is not intended to fund producers for a one-off 26-week period if the producer does not intend to continue producing RtR material. Withdrawal from the program is permitted at any time; however, the funding agreement between the producer and the Waste Authority must be entered into in good faith.

The Waste Authority's approval of routine sampling is limited to the purpose of supplying suitable C&D product for use in the RtR program.

4.1.2 Independent auditing

To be eligible for RSS funding, a producer must allow independent auditors to audit products and procedures in accordance with the MASP and RtR Product Specification. This includes allowing audits after the site has moved to routine sampling and is no longer eligible for funding. If producers decline audits, RtR accreditation will no longer apply to the site or the material produced on the site, and a change of status may be indicated on the Waste Authority's [website](#).

4.2 Eligible funding items

Item	Funding amount	Conditions	Inclusions	Exclusions
MASP	Producers may claim up to 50 per cent of the cost of engaging a suitably qualified person to prepare a MASP.	<p>Producers must engage a suitably qualified person to prepare a MASP in accordance with the RtR Product Specification.</p> <p>The Waste Authority reserves the right to limit MASP funding if the qualified person's costs are unreasonable in comparison with similar MASPs at other sites.</p>		
Intensive sampling	Producers may claim RSS funding to reimburse 100 per cent of intensive sampling and testing costs undertaken in accordance with their MASP.	<p>Sampling and testing must be undertaken in accordance with the MASP approved by the Waste Authority.</p> <p>RSS funding is available to each producer for no more than 34 weeks of continuous intensive sampling. The 34-week period allows for:</p> <ul style="list-style-type: none"> • twenty-six weeks (or six months) of intensive sampling, being the minimum period required before the Waste Authority will assess a producer's request for routine sampling • up to eight weeks of additional intensive sampling, to allow for the Waste Authority to consider approval of a producer's request for routine sampling. 	<p>Sampling and testing funding is limited to:</p> <ul style="list-style-type: none"> • Laboratory costs for analytical testing aligned with Appendix 1 of the RtR Product Specification: <ul style="list-style-type: none"> ◦ Testing outside of the scope of Appendix 1, including geotechnical testing, is not eligible for reimbursement. If a qualified person has recommended and justified the inclusion of additional environmental chemical analysis as part of the MASP for the site, these tests would be eligible for reimbursement. • Equipment, capital infrastructure and other purchased or hired disbursements (such as sampling bags, mileage, machinery sampling equipment purchases, insurances, safety equipment, sundry items, etc.) are not eligible for reimbursement. • Staff time for sampling – may be reimbursed by the Waste Authority's discretion. Producers should provide reasonable evidence to substantiate staff costs including logs of dates and times sampling occurred, hourly rates of in-house staff, etc. 	<p>The RSS only funds the cost of intensive sampling and testing associated with the RtR Product Specification.</p> <p>It does not fund other testing or other purposes that may be required by a producer. Other costs may include, but are not limited to:</p> <ul style="list-style-type: none"> • testing outside of the scope of Appendix 1, including geotechnical testing, with the exception of environmental chemical analysis specified and justified in the MASP by a qualified person • equipment, capital infrastructure and other purchased or hired disbursements (such as sampling bags, mileage, machinery sampling equipment purchases, insurances, safety equipment, sundry items, etc) are not eligible for reimbursement.

4.3 General information

4.3.1 RtR Product Specification

The RtR Product Specification is for the purposes of supplying material under the RtR program and is not a DWER regulatory document.

Material does not have to meet analytical limits in Appendix 1 of the RtR Product Specification to be eligible for sampling and testing reimbursement; however, if producers encounter material that exceeds or otherwise does not meet analytical limits, they should immediately investigate the cause of the exceedances, make efforts to correct any issues, contact the program manager to discuss the issue, and retest material where necessary to ensure issues have been corrected.

Material that does not meet RtR Product Specifications cannot be sold to any buyer as RtR product, either overtly or by suggestion or omission.

Producers, transporters and users of material that meets the RtR Appendix 1 specifications are still required to meet all other legal requirements that apply to the handling, transport, storage and use of the material. The specifications in RtR Appendix 1 are for the purposes of applying for funding only.

Accredited RtR producers will be listed on the Waste Authority's [website](#) as a guide for purchasers.

4.3.2 Claims

Producers must submit claims using the claim form at Appendix C.

Claims must be accompanied by documentation such as test results from National Association of Testing Authorities (NATA)-accredited laboratories, and evidence of expenditure.

4.3.3 Disputes

The Waste Authority reserves the right, at its absolute discretion, to withhold funds claimed under the RSS to entities that it reasonably determines do not meet these eligibility requirements.

4.3.4 Qualified person

'Qualified person' means a person possessing relevant tertiary qualifications to a minimum bachelor level, such as in environmental science or environmental engineering, with a minimum of five years' experience in analysing laboratory results related to contaminated sites, or extractive industry testing.

A qualified person must also be (or be overseen by):

- a certified practitioner (a person holding a 'Site Contamination' specialist certification under the Certified Environmental Practitioners Scheme), and/or
- an accredited contaminated sites auditor.



5.0 Contacts

For further information regarding the RtR program or the RSS, please contact the program manager at RtR@dwer.wa.gov.au.

Contact details for the Waste Authority are:

Address: Waste Authority
C/O Department of Water and Environmental Regulation
Level 7, Prime House
8 Davidson Terrace, Joondalup

Mail: Locked Bag 10
JOONDALUP DC WA 6919

Telephone: (08) 6364 6965



Appendix A: Recycler Support Scheme registration form

Organisation details

Name _____

ABN _____

Postal address _____

Contact person _____

Position _____

Phone _____ Mobile _____

Fax _____ Email _____

Facility details

DWER licence number _____

DWER licence categories _____

Estimated tonnes processed per week _____

Products produced

- Recycled road base Recycled drainage rock

Applicant declaration

- I have read and understood the Recycler Support Scheme guidelines.
- I commit to engaging an independent qualified person to produce a MASP.
- I understand the funding conditions in relation to the preparation of a MASP.
- I confirm my commitment to implementing intensive sampling in accordance with the approved MASP.
- I confirm my intention to submit a request to the Waste Authority for approval to undertake routine sampling.
- I commit to engaging an independent qualified person to prepare an application routine sampling.

Authorised person

Signature _____

Name _____

Position _____

Date _____

Application form and MASP should be submitted to:
 Waste Authority
 C/O Roads to Reuse program manager
 Email: RtR@dwer.wa.gov.au

Appendix B: Routine sampling criteria summary

To demonstrate that a site should be approved for routine sampling, a suitably qualified person should be engaged to prepare a report which addresses the criteria outlined in the RtR Product Specification and summarised in Table 1 (see section 4.2 above for more). The report should be brief, provide the Waste Authority with assurances that an independent assessment has been made, and include appropriate evidence provided as attachments.

Table 1 - Summary of RtR Product Specification criteria relating to routine sampling

RtR Product Specification criteria	Information to be supplied by the producer
Material Acceptance and Sampling Plan, approved by the Waste Authority.	<i>Provide date of approval and supporting evidence.</i>
Evidence of preliminary audit (including site inspection).	<i>Provide date and evidence.</i>
Evidence an inspection and routine sampling has occurred and demonstrates to the satisfaction of the Waste Authority that the Product Specification has been consistently achieved by the producer for a continuous six-month period.	<p><i>Provide a short report by a consultant which assesses and confirms the following criteria have been met:</i></p> <ul style="list-style-type: none"> • <i>sampling and testing occurred over a minimum 26-week period (with evidence to support), which should also include comments regarding:</i> <ul style="list-style-type: none"> ○ <i>whether concentrations of all analytes were below the relevant criteria (maximum average and absolute maximum values, where applicable) presented in the RtR Product Specification</i> ○ <i>whether asbestos (AF/FA) was detected</i> • <i>three sampling and testing audits conducted and passed (with evidence to support)</i> • <i>comments addressing any non-compliances of material with explanations of corrective actions taken</i> • <i>an analysis of laboratory testing and results including statistical interpretation of results, as required by Product Specification, and a tabulated summary of data and assessment of adherence with specification</i>
Evidence that a representative quantity and range of wastes have been processed in the six months of product testing.	<p><i>In the short report by the consultant, outline the following conditions and whether they were met:</i></p> <ul style="list-style-type: none"> • <i>quantity of material processed</i> • <i>range of wastes processed</i> • <i>summary of locations of origin of wastes processed.</i>
Confirmation that the assessed activities represent standard business for the producer in terms of throughput.	<i>Provide a concluding statement that the producer is confident this criterion has been met.</i>

For a producer's products to remain accredited as an RtR supplier, the producer must continue intensive sampling until the Waste Authority provides a written response to the producer's application for routine sampling.

RSS funding for intensive sampling is available for up to eight weeks following the submission of an application for routine sampling, or the date upon which the Waste Authority approves the producer's application, whichever occurs first.



Appendix C: Recycler Support Scheme claim form

Please attach evidence of expenditure and laboratory results

Construction and demolition producer details

Premises name	_____	Occupier name	_____
Facility address	_____	Licence number	_____
Contact name	_____	Date submitted	_____

Sampling overview

Sampler _____

Sample description (e.g. aggregate, soil) _____

Total weight or volume from which samples were taken (tonnes or m³) _____

Number of samples _____

Start date _____ End date _____

Testing (analysis) overview *(attach test results)*

Laboratory _____

Start date _____ End date _____

Claim overview *(attach invoices and evidence of expenditure. Note: claims are exclusive of GST)*

Total cost of sampling	\$
Total cost of testing by NATA-accredited laboratory	\$
50 per cent of cost incurred for engaging a consultant to develop the MASP (one claim only; please attach invoice for full cost of MASP)	\$
Total for this claim (ex GST)	\$

Applicant declaration

I declare that the details given here are true and correct.

Authorised person

Signature _____

Name _____

Position _____

Date _____