



**THE STABLE FLY ACTION GROUP INC  
PO BOX 114  
LANCELIN 6044**

Email : [chairman@stableflyactiongroup.org.au](mailto:chairman@stableflyactiongroup.org.au)  
[secretary@stableflyactiongroup.org.au](mailto:secretary@stableflyactiongroup.org.au)

4 December 2009

Your Say Waste WA  
Waste Authority of Western Australia  
Locked Bag 43  
Cloisters Square  
Perth 6850

Dear Sirs

The Stable Fly Action Group Inc (SFAG) has received a copy of the Draft Waste Strategy and discussed it at the meeting of the SFAG Committee on 24 November 2009.

The Group is very disappointed that the Strategy does not address agricultural residues, in particular the safe disposal of raw animal manures.

On Page 4 of the Strategy, under the heading *Introduction to the Strategy and why we need it*, it is stated that the Waste Avoidance and Resource Recovery Act established the Waste Authority and required it to develop a long term Waste Strategy for Western Australia, and that the Strategy is obliged to plan for continuous improvement of waste services, waste avoidance and resource recovery, benchmarked against best practice.

While it is readily acknowledged that the quantity of household waste, green waste and industrial wastes have increased markedly in recent years, and plans for its future disposal must be addressed, the issue of treatment (and resource recovery) from raw manures, in particular raw poultry manure, remains problematic.

On Page 9 of the Strategy, under the heading *Waste Management Responsibilities*, it is stated that waste generators, including businesses and householders, are responsible for proper management of waste through their use of recycling and disposal systems.

What is the reasoning behind excluding raw manures and other agricultural residues from the Draft Strategy, and forcing generators of raw manures to take full, legal responsibility for their waste?

On Page 11 of the Strategy, under the heading *Values, Aim, Principles and Objectives*, subheading *Principles*, it is stated that the Aim of the Strategy is to

*“drive a decade of significant improvement in the management of waste in Western Australia, which will be achieved by applying principles such as promoting the most efficient use of resources, including resource recovery, reducing environmental harm including pollution through waste, consideration of resource management options, including resource recovery and disposal, including reprocessing, and identifying and supporting solutions that offer the best value for money.”*

Why is it not considered vital that raw animal manures, particularly raw poultry manure, come under this description?

Safe disposal of raw poultry manure in particular is a serious problem in Western Australia. Many hundreds of thousands of tonnes of it is produced by poultry sheds in Western Australia, and large quantities of it is disposed of illegally.

As well as being a breeding source for stable flies, which have a devastating effect on animals and humans, it is also incriminated in serious ground water contamination by nitrate leaching in horticultural areas north of Wanneroo.

The SFAG requests that the Strategy take steps to counter these activities, which are causing serious environmental, social and human health problems.

Yours faithfully  
Bob Wilson  
Chairman  
The Stable Fly Action Group Inc  
Ph 9655 1055