

**Trstenjak David**

From: Geoff Thompson [ThompsonG@ap.aurecongroup.com]
Sent: Monday, 19 July 2010 4:16 PM
To: waste paper
Cc: Oliver Furbur; cadeg@ap.aurecongroup.com; Alec Tadman; Karen Field
Subject: Queensland Waste Strategy consultation draft submission

Hello

I would like to congratulate the DERM officers, Queensland Government elected representatives and everyone else involved in this process. In my opinion, the outcome is a huge step forward in the right direction from where Queensland waste policy has been. I believe the introduction of avoidance/reuse/recycling targets and a levy on waste to landfill will positively influence waste related environmental outcomes in Queensland. My suggestions for improvement centre on the issues of non-application of the proposed levy on MSW and the use of funds raised by the levy.

Municipal Solid Waste (MSW) should be levied

From the Proposed Industry Waste Levy Consultation Draft dated June 2010, the reasons a levy is needed include:

- A price signal to encourage waste generators to change behaviour.
- A source of funding to assist local government, business and industry establish better waste avoidance and resource recovery practices, and to improve waste management overall.
- An incentive for industry investment in resource recovery infrastructure.
- A disincentive for unnecessary landfill disposal.
- A level playing field with waste disposal costs compared to other states.

These reasons, with which I agree, are as relevant to MSW as any other portion of a waste stream.

MSW comprises domestic collection waste and householder self-haul material that together amount to about 30% of generated waste. To significantly reduce waste to landfill and drive resource recovery, such a large portion should not be ignored. If an objective is cost effective minimisation to landfill and maximisation of resource recovery, then MSW can not be ignored. The argument that "Councils have already done their bit by introducing kerbside recycling programs" and the like ignores the potential for MSW reduction to significantly contribute to achievement of overall landfill disposal reduction targets.

The experience in other locations that apply different levy amounts to different waste stream elements is that a financial incentive is created for waste generators and carriers to "leak" material from the higher levied category into the lower.

The Waste Avoidance and Recycling Consultation Draft dated June 2010 proposes a target of increasing from recycling 23% of MSW in 2008 to a 65% in 2020. Such an ambitious goal would be far more realistic if the full suite of tools including the proposed levy were applied to MSW.

A reason given for not applying the levy to MSW is that it would not change generator (householder) behaviour because everyone has the same sized MGB and it is therefore not possible to send a "polluter pays" price signal to encourage avoidance/reuse/recycling. However there are systems that can reward waste reduction behaviours. One example is charging a lower garbage rate to a property that swaps their 240 litre MGB for one of lesser capacity. It should also be noted that MSW includes householder self-haul waste. If a householder has the option to be charged a lower disposal fee when they use a disposal facility such as transfer station or landfill, they will seek ways to do so - usually by waste reduction, reuse or recycling.

The funds raised by the levy should not be used to implement or prop up environmentally or

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economically inefficient waste programs

The levy funds should not be used to establish or prop up uneconomic (but possibly popular) schemes eg Kerbside Recycling in locations where economies of scale and distance from reprocessors and markets render the scheme uneconomic. The funds allocated those areas should be used on other projects that deliver an environmental benefit that is effective from both an environmental and cost perspective.

Thank you for the opportunity to provide comment. I would be happy to discuss this further should you wish.

Regards, Geoff

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