



Dedicated to a better Brisbane

26 July 2010

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Project Manager  
Queensland's Waste Strategy Consultation  
Natural Resources and Environment  
Department of Environment and Resource Management  
GPO Box 2454  
BRISBANE QLD 4001

Dear Project Manager

Please find attached Brisbane City Council's (Council) response to Queensland's Waste Strategy 2010-2020 *Waste Avoidance and Recycling Consultation Draft* and companion document, *Proposed Industry Waste Levy Consultation Draft*.

As the representative local authority for waste management in Brisbane, I trust the attached comments and recommendations will provide valuable feedback for the further development and implementation of Queensland's Waste Strategy 2010-2020.

If you wish to discuss any points of Council's response in further detail, please contact Council's Acting Strategy Manager in City Waste Services, Ms Fiona Glance, directly on 3027 5702.

Yours Faithfully,

Arron Lee  
Manager  
**CITY WASTE SERVICES**

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28 JUL 2010

Attachment A: Council's response to the *Waste Avoidance and Recycling Consultation Draft*.

Attachment B: Council's response to the *Proposed Industry Waste Levy Consultation Draft*.

Brisbane City Council ABN 72 002 765 795

**Attachment A:**

**Brisbane City Council response to  
Queensland's Waste Strategy 2010 – 2020  
Waste Avoidance and Recycling Consultation Draft**

**Purpose**

To provide comment and recommendation in response to Queensland's Waste Strategy 2010-2020 *Waste Avoidance and Recycling Consultation Draft*, released by the Queensland Government in June 2010.

**Discussion**

The Queensland Government should be congratulated for delivering a realistic and achievable strategy. Apart from the brief mention of a container deposit system, this strategy is consistent with the direction of Brisbane City Council's (Council) *Toward Zero Waste Strategy*, which was released in March 2009.

**Recommendations**

Council has identified the following issues in the consultation draft and request these be addressed. These issues have been grouped with the corresponding topics in the consultation draft.

Baseline data for targets

- While the strategy acknowledges the need for reforming data collection and analysis protocols (p30), current data does not provide a true reflection of waste management situation in South East Queensland (SEQ). Therefore, current data should not be used as a baseline for establishing new targets.
- It is important that a complete analysis of "the state of waste" in Queensland be completed before attempting to establish targets. To achieve this, it may be necessary for all councils, resource recovery industries and industry groups *et al* to provide information. This could be provided in response to questions that are not ambiguous or have the capacity to be misconstrued or misinterpreted, thus providing data which can be used as an accurate baseline.
- Data collection methodology and waste terminology, including classifications of waste types, must be consistent with the Federal waste policy.

Resource exchange system

- The implementation of a resource exchange system must be carefully considered as every such system implemented around the world has failed due to variations in commodity nomenclature and unit of measure. The resource exchange system implemented by Local Government Association of Queensland (LGAQ) in 1998 also failed because of this issue. Most units of measure for waste are recorded in either weight (kg/tonnes) or volume (m<sup>3</sup>) and have not considered industry retail measurement protocols (e.g. timber could be measured in lineal metres or m<sup>2</sup>). This issue needs to be considered in the development of data protocols.

### Product stewardship / extended producer responsibility and design for environment

- Council strongly supports the Queensland Government in the development of product stewardship / extended producer responsibility initiatives. This is critical in achieving long term waste avoidance and minimisation.
- Design for environment (DfE) is already on the agenda for design industries. The Design Industry Association (DIA) has already negotiated with Council to improve their practices. It is considered they would be more than willing to provide some guidelines for initiatives/programs for inclusion in the Queensland Waste Strategy.

### Resource recovery and awareness

- A lot of work has been completed by local government in SEQ with the establishment of Demolishers, Recyclers and Asbestos Contractors Association of Queensland (DRACAQ) has been completed by local governments in SEQ. As this industry has established a workable Code of Practice, Council recommends this be used as the baseline for establishing industry waste reduction practices in Queensland.
- The development of similar industry development programs would be beneficial in reducing waste and improving recovery of resources across all industry. The provision of grants and/or initiatives for industry groups to develop such programs would be beneficial.

### Sustainable purchasing policy

- The development of the Queensland Government sustainable purchasing policy is a forward step in reducing waste generation and increasing resource recovery. This outcome would be significantly enhanced by providing preferences for tenders from organisations that are members of industry associations and work to a Code of Practice that supports waste reduction initiatives.

### Container deposit legislation

- While only minor mention has been made of Container Deposit Legislation (CDL), Council believes the compulsory implementation of such scheme in Queensland would be a retrograde decision. Container deposit schemes that have been implemented over existing kerbside collection systems around the world have not been successful. The South Australian (SA) model was implemented prior to the SA kerbside systems; therefore kerbside contracts had taken account of available commodities.
- Most local governments in Queensland have invested in kerbside recycling, which recovers the most valuable recyclable commodities under contract. The need to invest in an additional resource recovery system, similar to the SA model, would result in having two systems competing for the same valuable commodities. Not only would this be a significant cost in infrastructure, it would potentially leave councils liable for additional contract costs if commodity volumes to contractors are reduced.

**Attachment B:**  
**Brisbane City Council response to**  
**Queensland's Waste Strategy 2010 – 2020**  
**Proposed Industry Waste Levy Consultation Draft**

**Purpose**

To provide comment and recommendation in response to Queensland's Waste Strategy 2010-2020 *Proposed Industry Waste Levy Consultation Draft*, released by Queensland Government in June 2010.

**Discussion**

Brisbane City Council (Council) agrees to the overall principle of introducing an industry waste levy as an enforcement tool to encourage positive waste minimisation behavioural change.

However, the application of the proposed industry waste levy requires a level of detail not provided in the consultation draft document.

**Recommendation**

The following recommendations relate to the implementation and operation of the proposed industry waste levy.

- Council strongly recommends that effective programs are also developed to allow business to participate in waste minimisation activities.
- To accommodate increased recycling and collected commodities, a portion of the proposed levy needs to be invested by the Queensland Government into developing markets and industry.
- The waste levy should recognise well engineered landfills with gas capture reticulation. For every megawatt hour of electricity generated from landfill gas, three-quarters of a tonne [750kg] of waste is consumed in creating the gas used to make the power.
- The consultation draft identifies the need for the levy to create a "level playing field with waste disposal costs compare to other states" (p1). Under the Victorian levy model, landfills receive a blanket 15% levy rebate to cover production and use of cover material. Therefore, Council suggests 8-10% retention of levy funds by councils to cover imposed administration costs.
- The consultation draft states that "materials that are segregated for recovery not disposal at the waste disposal facility" (p4) are exempt from levy charges. Therefore, bio-cells should be regarded as a production vessel only, not a landfill. The processed materials from the bio-cell, if demonstrated to be genuinely reused or recycled, can be regarded as a tonnage deduction for levy calculation.