



# Beutel, Oughtred & Sons Pty Ltd

Department of Environmental Resource Management  
 RE: Queensland Waste Management Strategy 2010-2020 Submission

29<sup>th</sup> July

TO WHOM IT MAY CONCERN

Thank you for reviewing our submission for the Queensland Waste Strategy 2010-2020 draft.

Beutel Oughtred and Sons is a concrete and construction demolition recycling facility located in Toowoomba, Qld. We have been operating for 3 1/2 years. Therefore this submission will relate to this particular area of interest.

We believe that this draft is a positive view on how we can tackle waste management in Queensland therefore enhancing Queensland's natural and urban environments. After reviewing the document we have come up with a few questions that we would like answers to and we propose an idea on how we can maximise responsible disposal of concrete and construction demolition waste.

1. What consequences are there currently for illegal dumping of concrete and C&D waste?
2. Are there any new changes to these consequences under the proposed draft?
3. What incentives are there for businesses to dispose of responsible? (Apart from avoiding the levy by disposing of at a recycling facility.)
4. Is it thought that these incentives if any will be enough to encourage those less responsible businesses to become more environmental conscious?

In relation to: Action 9, Enhanced litter and illegal dumping compliance programs.

1. What specifically is an Illegal Dumping Squad and what role will they play in decreasing this unwanted practice?
2. Is it thought that this will be sufficient to combat the expected rise in illegal dumping?
3. What is the expected response time?
4. How are the Dumping Squads to be contacted?
5. Is this Dumping Squad a long term approach to the problem of illegal dumping?
6. Is there any extra support going to be given to Local Governments in relation to policing and monitoring waste disposal within its boundaries?

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In relation to the disposal of asbestos post the introduction of the levy, our concern is that we are going to see an increase of concealment of asbestos in the concrete disposed, in an attempted to reduce disposal fees as a direct relation to the application of the levy.

1. Has it been considered and if so how does the draft recognise that industry may have to outlay expenses to recover and remove such a contaminant?

On page 31 of the draft it states that, "The Queensland Government believes that price signals also have a role to play in improving resource recovery". (Queensland's Waste Strategy 2010-2020, p31) One example discussed here is the deposit /refund system, to provide an incentive to consumers to return end of life products for recycling.

We as a business have a proposal that could ensure that the bulk of concrete and construction and demolition waste was channelled into at worst, local government landfill sites and at best, resource recovery sites.

We believe that if a developer was charged a refundable deposit to either the Local Government or the DERM upon approval for development or demolition of a site. At this point the developer would nominate the site or sites for disposal of the waste. Once it was proved that indeed the waste was disposed of accordingly the deposit would be refunded. Proof could be by means of receipts.

We believe that this would make the developer have a financial interest in ensuring that the waste is disposed of correctly. Also, it would make all tiers of businesses in the transporting of construction demolition waste accountable to the developer. This would reduce work loads on the State and Local Governments proposed Dumping Squads and Environmental Health officers chasing environmentally irresponsible businesses, as this job would then be done by the developer wanting to receive their deposit back. This would also reduce the cost of State and Local Government clean up bills for hot spots.

We are aware of section 369(a) of the Environmental Protection Act 1994, and its advice on the transporting of waste. We are also aware of the forms which our Regional Council have developed to comply with this section. However, to our knowledge it appears that you can transport concrete and construction demolition waste with out this permit by means of lack of monitoring by Local Government and other authorities. This new proposal would be a more certain way of ensuring that the waste was being disposed of correctly. It could be said that this Section of the Environmental Protection Act 1994 is not effective, as if it was hot spots and illegal dumping should not exist.

While we admit that this proposal would be more complex to implement then outlined above we do strongly believe through our industry knowledge that this would be effective in maximising correct waste disposal and resource recovery.

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We have intentions of approaching our Regional Council with this proposal, but feel that this would be better implemented on a State level. Anticipatory feedback we may receive from Regional Council would inhibit such an idea on the grounds of budgetary constraints.

We look forward in anticipation to your written response to our questions and written feedback on our proposal.

Yours Sincerely,

Jalcyn Oughtred  
Beutel, Oughtred and Sons.

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