

30 July 2010

Waste Policy Unit
Department of environment and Resource Management
State of Queensland

To the Project Manager

Bundaberg Regional Council wishes to express the following in reply to the Waste Avoidance and Recycling Consultation Draft of the Queensland Waste Strategy 2010-2020.

Council applauds the Government for looking to take a decisive step in improving Resource Awareness in the community and in identifying waste avoidance as a critical factor in the State of Queensland. The need to achieve parity with other states of Australia is also recognised.

Queensland Waste Strategy 2010 -2020 - Consultation Draft

In relation to the priority policy actions identified in the consultation draft the following comments are proposed in answer to direct questions asked:-

Waste Avoidance Targets. The setting of targets for waste avoidance is appropriate and allows for setting of specific goals and quantification of results in assessment of the results. The targets that are outlined in the paper appear to be reasonable and achievable. No further targets or measures for waste avoidance are recommended.

Resource Recovery Targets. The targets set in Table 1 – *Key Recovery and Recycling Targets* appear to be reasonable and achievable conditional on adequate resourcing and policy support being provided. Restricting the targets to the four major waste source types is appropriate. All significant waste streams are generated by one or more of these major waste sources and will be captured by these targets. Setting more detailed or prescriptive targets at this early stage could be counter productive and lead to confusion and distraction.

The issue of deposit / refund schemes is of concern to Council. Whilst it is acknowledged that such schemes may well improve recovery rates it is believed that other less potentially destructive systems could be introduced to achieve the same ends. Council currently has a significant infrastructure investment in the recovery of recyclables as well as a contractual arrangement with a community group employing people with disabilities to this end. The impact of any deposit / refund scheme on these arrangements must be taken into account. An independent scheme that does not take into account existing systems will without doubt deal a fatal blow to the sustainability of existing systems and arrangements.

Disposal Targets. The lack of baseline data on illegal dumping and litter makes setting of targets a futile exercise. An overarching aim to reduce the incident of these issues in the first instance is appropriate. Once some resourcing and policy grounding has been put in place more specific targets may become appropriate.

The setting of landfill diversion targets is not supported on similar grounds, particularly if they were to be mandated. There exists no solid baseline data on current trends so the setting of quantifiable targets is of no value. It believed that a supportive and co-operative approach to these issues will be far more successful

than an onerous enforcement style of approach. A positive partnership between State and Local Government is what is called for to achieve the aims of this new strategy.

Actions. The list of 26 specific actions intended to be taken to achieve the aims of this strategy that are tabled at the end of the consultation draft are acknowledged. The fact that they are clearly targeted at all stakeholders in the waste industry is lauded. Council supports all actions aimed at Local Government and will, within financial and community approval constraints, do all it can to work with the State Government in achieving all desired outcomes in these areas and also in those within its community where it has appropriate influence.

Queensland Waste Strategy 2010 -2020 – Waste Levy Consultation Draft

In relation to the proposed Industry Waste Levy Consultation Draft the following comments are made:-

The introduction of a levy has been anticipated for a number of years. The fact that other states had applied them and not Queensland was an issue that needed addressing. The fact that they are not being applied to Municipal Solid Waste is acknowledged as a positive. Council believes that ratepayers have been required to be resource aware for a number of years now and have thereby been required to fund resource recovery for their sector already and are well on the way to being responsible in this regard. The industrial and commercial sector needs to come in line with this before any more stringent fiscal demands be placed on ratepayers.

Although Council acknowledges that there is an added impost on Council to provide administrative support to the operation of the levy scheme with no apparent compensation, it accepts that as the sole landfill owner and operator in the region this impost is unavoidable. Council intends to support the introduction of the levy's administrative systems and work co-operatively with the State Government in its introduction. This commitment is contingent on the State Government assisting in the installation at all major landfills in the region.

It is believed that in the preliminary stages of a Waste Avoidance and Resource Efficiency scheme such as that proposed by the State Government in these Consultation papers that all funding raised by the scheme must be directed back directly into the waste area.

While the idea of funding general 'green' initiatives and the funding of Local Government in general is seen as a positive, it is believed that in order for the proposed targets to be met all money raised must be utilised to cover the new infrastructure that will be required in regional and rural Queensland. Particularly in the first four years of the scheme. There will be sufficient money generated over the next few decades from this levy to assist in general environmental issues in due course.

The draft document is obviously not intended to answer all questions in relation to the application of the levy so it is acknowledged that there are significant areas where further definition is required. This includes the definition of Municipal Solid Waste, the methods for charging loads which contain mixed waste streams that attract differing levies, the issue of applying the levy to mixed loads which are later sorted by Council and only partly landfilled and levy exemptions.

In summary, Bundaberg Regional Council applauds the Queensland Government's Department of Environment and Resource Management in its move to establish a

more sustainable community in the area of Waste and Resource Awareness and will support, as far a possible, the necessary obligations placed on it to achieve the goals of the strategy.

If you require any further information, please contact Council's Manager Waste and Recycling Services, Mr. James Stanfield, on 1300 883 699 quoting reference number L100023.

Yours faithfully

James Stanfield
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