



Enquiries to: Anne McLaughlin
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30 July 2010

Project Manager
Queensland Waste Strategy consultation
Natural Resources and environment
Department of Environment and Resource Management
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BRISBANE QLD 4001

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Dear Sir/Madam

SUBMISSION - QLD WASTE STRATEGY 2010-2020 – WASTE AVOIDANCE AND RECYCLING CONSULTATION DRAFT AND PROPOSED INDUSTRY WASTE LEVY

Please find following the submission on behalf of Burdekin Shire Council in relation to the above named documents.

Draft Waste Strategy – Waste Avoidance and Recycling

Burdekin Shire Council applauds efforts to finally produce a waste strategy to provide direction and targets for the state that can be implemented through regional and local waste strategies. However, it is clear that the draft is deficient in numerous areas as the strategy fails to investigate the full impact of actions suggested and in particular fails to recognise the implications to regional and rural Queensland.

The following comments are provided on the draft strategy.

Why do we need a new strategy?

Comment- The commonwealth has produced a national waste policy containing 16 priority strategies. The state strategy should incorporate the priority strategies to provide a coordinated consistent approach. In particular strategy 14 -*Identify actions to build capacity and ensure an appropriate suite of services is available to regional and remote communities. (States and territories individually)* has not been adequately addressed within the draft strategy.

Recommendation Provide detail how the state strategy will fit into the national strategy. Provide detail on methods that will show that on ground actions will meet the 16 priority actions and in particular Strategy 14.

Goals

Comment: The aims of the waste management strategy should be to provide strategies to minimise the generation of waste. The generation of "green jobs" is listed as an aim. The generation of green jobs may be an outcome of the implementation of jobs but the strategy should be directed to minimisation of waste generation. The priority actions of the commonwealth should be reflected in the goals.

Recommendation- Remove the creation of green jobs as goal in itself and provide goals and targets consistent with the national priority areas.

3.1 Working in Partnership

Local Government

Comment- It is noted in the draft document that local government has the responsibility of 'providing waste management and recycling education and awareness to residents and schools.' It should be noted that the school education program should be the responsibility of Queensland Education, as part of their curriculum.

It is further noted that local governments will be encouraged to undertake certain actions, including providing sustainable waste and recycling services. There is no description of what sustainable waste or recycling collection services are. For example in regional Queensland it is neither economically or in terms of energy – sustainable to provide many recycling services yet local governments are still providing these services.

Recommendation – Provide how the state will manage waste and recycling services in regional and rural areas to ensure that they are sustainable in terms of energy or economic efficiency.

3.3 Increasing investment

Comment: It is stated that there are strong markets for some recovered materials such as plastic, aluminium, paper and cardboard, timber and concrete. This is not the case in rural and regional areas, where there are insufficient local markets, and it is not economically feasible to send materials for reprocessing. For example there is no market for timber and concrete products in regional or rural areas, and local governments expend large costs in separating, reprocessing, storing and maintaining these wastes.

Recommendation: Remove the word "strong" and the reference to timber and concrete.

Comment: The strategy refers to developing new markets for recycled products. This must be extended to develop markets for existing separated materials especially to overcome economic and environmental impacts associated with transportation and locations outside SE QLD. A full analysis of the economics and markets associated with any intervention through direct or indirect subsidies including analysis of impacts that any subsidies may have on local government income has not been completed.

Recommendation: Show how and what methods the State will develop markets for materials that are currently unviable due to environmental and transportation costs. Show that the strategy will overcome constraints to investment in respect to regional and rural Queensland and how markets can be competitive in considering transportation costs without market intervention.

If it is intended that there is on going market intervention, state what the expected and duration of this and incorporate into a full cost benefit analysis.

3.4 Engagement, information and knowledge management

Comment – There is no acknowledgement that local governments currently undertake many of the initiatives listed. The strategy should consider how the State intends to fund listed initiatives, rather than to use local government resources as indicated by "establishing partnerships".

Recommendation- provide how initiatives will be funded.

4 Taking Action

Priority strategic actions

3. Disposal

Comment – The issues associated with littering and waste dumping are not consistent over the state – Regional and rural areas do not have the resources to enforce illegal waste disposal over large areas and it is acknowledged that applying a waste levy will increase the volume and incidence of waste dumping. One of the largest deterrents to waste dumping is the gate price for disposal. Implementation of the strategy will decrease revenue from waste disposal if illegal dumping increases, and raise costs to local government for collection of a levy, whilst the cost of compliance in operating landfills is increasing. No determination has been made regarding price signals.

Recommendation – full economic impact assessment is required including impact and costs of cleaning up and enforcement costs associated with increased cost of disposal and higher level of regulation.

Actions

Action 13 – Community recycling champions

Comment – It is noted that 5 recycling champions are to be funded, yet no indication as to how this will be decided or by whom. For example there are existing recycling services, both commercial and non commercial. How will funding or promotion of the recycling champions affect existing services and or local government efforts in recycling?

Recommendation - Provide advice on how community recycling champions will function and provide information on the expected impact.

Proposed Industry Waste Levy

Legislation

Comment- Current loopholes for waste dumping (of materials such as C&D waste) on private property with owner consent require addressing. In regional and rural areas, particularly farm land there is a high level of waste dumping under such circumstances. Local government is able to have some impact on this waste disposal through price setting waste disposal, however the impact of the levy will remove this control. The levy on C&D waste will probably be passed onto the consumer, resulting in higher prices, with no reduction in C&D waste.

Recommendation – Legislative changes must prevent economic and environmental impacts from application of a levy.

Comment – The definition and characterisation of wastes requires consideration so that waste produced by a local government as a service to the community is not subject to the levy.

Recommendation – provide definitions within legislation to prevent the application of a levy on wastes produced by a local government including its services.

Comment – residuals from reprocessing waste such as MRF are commercial wastes and there will be an impact on recycling costs if a levy was imposed.

Recommendation – provide definitions within legislation to prevent the application of a levy on residuals from reprocessing of recyclable materials.

Estimated revenue and potential impact

Comment – A cost benefit analysis has not been completed. Indicative costs must be predicted for the community including ratepayers from costs imposed on local governments for administering the levy, dealing with increased waste dumping, or increased waste collection costs on Council services or those provided for local government. Impacts must be considered for anticipated decrease revenue from disposal and higher collection costs including borrowings or operational costs required for collection, and any subsidies provided.

Recommendation – A full cost benefit analysis must be conducted, including impacts on local government with consideration to cost variances in regional and rural areas.

Potential benefits to business

Comment – A statement is made that the provision of a levy will be a more transparent and accurate reflection of the cost of waste disposal. It is not known how a levy or tax reflects the actual disposal costs since no consideration is given to the variability of costs of disposal over the state.

Recommendation – Provide a full cost benefit analysis and demonstrate through actual figures and amounts, how a levy reflects the actual cost of disposal throughout the state.

Facilities without weighbridges

Comment – It is suggested that some facilities outside the designated zone do not have weighbridges however, it is apparent that many facilities within the zone do not have weighbridges. The document does not provide information on the provision, manning, infrastructure of costs required to install weighbridges. Deeming provisions cannot be applied to mixed loads and will not enable the aims of the strategy to be met.

It is vital that the strategy adequately consider how the levy is collected to ensure targets are met. Levies must be placed on individuals to effect change to minimise waste. This will require whole systems and costs imposed by waste collectors. A method of transferring these costs at the weighbridge or waste disposal site for the levy collection must be applied in a transparent manner directly from producer to disposal site.

It must be recognised that mixed loads (domestic and commercial) are not exceptional. The exclusion of domestic waste from the levy cannot be adequately made at the point of disposal by either weight or volume. For example all waste collected by contractors on behalf of Burdekin Shire Council are mixed commercial and domestic loads.

Recommendation - The strategy must provide methods for the collection of a levy directly in response to the volume/weight of waste produced. The strategy must consider methods for this to occur in both where bins are collected from more than one premises, where mixed commercial and domestic waste occurs and conversion factors or weights at disposal sites cannot be applied.

Comment - The definition of MSW refers specifically to domestic waste including that collected via a kerbside service. The kerbside service provided, in this and probably many other Councils in Qld, incorporates collection of waste from commercial and/or industrial premises. The proposal does not provide clear direction on the logistics of calculating the levy on the percentage of waste from non domestic premises. It would be neither financially viable nor practical to run a separate kerbside service solely for commercial/industrial waste.

Recommendation - Provide clarification and practical solution to address the levy in relation to kerbside commercial services.

Enforcement

Comment - It is considered that local government take the responsibility of collecting a levy on behalf of the state. DERM currently do not have the ability or resourcing to undertake existing functions and many examples can be given of DERMs failure to provide responses within reasonable time periods.

Recommendation - provide and detail the review processes, and the specific resourcing dedicated to deal with disputes and review and detail how a system will be implemented where failures on behalf of DERM are encountered.

Establishment funding

Comment- It is likely that there will be an increase in illegal dumping activities. However, as noted previously legal dumping is currently permitted. Also no consideration is given to regional and rural Queensland where enforcement is costly, nor of rubbish dumping on crown land or land owned by the state.

Recommendation - Provide costing for funding for employment, training, on costs and promotion required to enforce waste dumping expected from resulting directly from the waste levy particularly those dedicated to regional and rural Queensland. Acknowledge changes to legislation that currently permit waste dumping on private property and farmland. Provide costing of the funding of cleaning up of waste dumping on state land.

Comment - Many facilities do not have weighbridges. Where these are to be installed establishment funding shall be provided to cover all costs of the design and installation and operation.

Recommendation -Where weighbridges are required to be installed, provide all costs for their installation including, design, site works, road works, drainage, services such as the provision of electricity supply to run required software/air conditioners, etc, and operation if the installation will require additional staff.

Distribution of the levy revenue

Comment - According to DERM, results annually published on the volume of waste produced in the state are highly inaccurate. To meet objectives of the strategy to minimise waste, all funds collected must be used directly in waste minimisation.

Recommendation – All revenue collected shall be applied directly into waste minimisation and where levy's collected are greater than WARE and SFF funds, these be returned to the local government areas where they are collected to be applied directly to waste minimisation strategies.

WARE fund

Comment – these funds are to assist the development of strategic plans, however how is it intended that strategies be developed over multiple local government areas. What mechanism will be provided to adhere to strategic plans or for multiple local governments to work towards such goals?

Recommendation – funds collected to be directed into waste minimisation and not into matters such as habitat protection or other environmental or non environmental related causes.

Comment - General statements that the business and industry will be assisted to improve waste avoidance and resource recovery practices through the fund but do not provide information on how this will be done and indicate that these matters have not been explored. There is no indication what funds will be absorbed in administration. For example the state has high administrative costs in service delivery compared with local government or the business sector, the funds should not be spent on running DERM.

Comment – funding considers assisting the resource recovery sector to support infrastructure upgrades and develop new markets for recovered materials. Funding must consider impacts to other markets and impacts to local government's waste management operations.

Recommendation – provide a full cost benefit analysis and show how the WARE fund will impact on local government's existing business (ie revenue from waste disposal etc).

Burdekin Shire Council also supports most of the submission made by LAWMAC.

Should you like to discuss this matter further, please contact Council's Environmental Health Project Officer, Anne McLaughlin on telephone (07) 4783 9800.

Yours faithfully



Linda Govan
ACTING MANAGER – ENVIRONMENT & HEALTH