



**Cairns
Regional
COUNCIL**

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YOUR REF:
OUR REF: BG:MH ## 2633602: 24/6/1-01

19 July 20100

Project Manager – Queensland's Waste Strategy Consultation
Natural Resources and Environment
Department of Environment and Resource Management
GPO Box 2454
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ENTERED 02/08
DK

Dear Sir

**RE: QUEENSLAND'S WASTE STRATEGY 2010 – 2020: WASTE AVOIDANCE AND
RECYCLING CONSULTATION DRAFT**

I refer to the above document currently in circulation for comment. Cairns Regional Council has endorsed the attached submission on the proposed changes to the management of waste in Queensland in the Consultation Draft. Please consider this submission in your further deliberations.

Council agrees with the strategic intent and goals of the proposed strategy. These are generally in line with Council's own Waste Strategy 2010-15 adopted by Council in December 2009.

While there are a number of relatively minor matters raised in Council's submission, the primary issues that may impact on Council include:

1. The potential impacts of the introduction of the industry waste levy in July 2011.
2. Costs of increased monitoring and enforcement of illegal waste dumping.
3. The development of strategies and frameworks that promote the activities of waste avoidance and recycling, and resource recovery in Far North Queensland.
4. Additional burden that will be placed upon Councils with regard to data collection and reporting.
5. Access to funding grants by Councils to achieve the outcomes of the strategy in regional Queensland.

These and other matters are discussed in more detail in the attached submission for your consideration. Should you wish to discuss any of the matters contained in the submission please contact Bruce Gardiner, General Manager Water & Waste at Council on 4044 8220.

Yours sincerely


LYN RUSSELL PSM
Chief Executive Officer

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**QUEENSLAND'S WASTE STRATEGY 2010 – 2020: WASTE AVOIDANCE AND
RECYCLING CONSULTATION DRAFT**

Submission from Cairns Regional Council

Introduction

Council has reviewed the consultation draft in detail and provides the following comments for your consideration. In our submission we have identified the key items for consideration first, then provided detailed comments based on the document under each section heading in the draft strategy document. We have also responded to the specific questions on targets posed in the document.

Key items for consideration

The major items that Council believes require further consideration are outlined below.

1. The potential impacts of the introduction of the industry waste levy in July 2011.

These impacts include administrative costs for Council in collection and reporting of the levy and also the potential penalties for Councils should they not meet the requirements of the new legislation. The State Government should ensure that avenues to recover additional costs will be made available either through the levy itself or other means. It is also hoped that further detailed consultation on the details of the process of collection and reporting will occur in regional Queensland to assist in the development of a scheme that achieves the desired outcomes.

2. Costs of increased monitoring and enforcement of illegal waste dumping

Council is confident that instances of illegal waste dumping will increase with the introduction of the levy. Providing Councils with the ability to resource additional monitoring and enforcement action will be essential to limiting these impacts.

3. The development of strategies and frameworks that promote the activities of waste avoidance and recycling, and resource recovery in Far North Queensland.

Consideration to the tyranny of distance and lack of economies of scale in supporting regional strategies should be considered in the future actions under the strategy. This could include specific funding or subsidy arrangements that assist in making regional projects commercially viable such as capital grants and transport subsidies for getting products to markets located in SEQ.

4. Additional burden that will be placed upon Councils with regard to data collection and reporting.

Providing Council with the ability to recover costs for the development of data collection and reporting systems is seen as critical to the achievement of the strategy aims. Council also considers it essential that the State Government consults with regional Local Government in the development of the reporting frameworks.

5. Access to funding grants by Councils to achieve the outcomes of the strategy in regional Queensland.

While it is acknowledged that 3 funding sources will be made available, these sources appear to be primarily targeted at infrastructure projects. Funding opportunities for staff resources will also be critical in assisting Councils to play their role in achieving the aims and goals of the strategy and should be considered further in the strategy.

Detailed Comments on the Draft Strategy

1. Setting the scene:

Council notes that the release of new waste strategies by various councils in Queensland does not acknowledge the Cairns Regional Council Waste Strategy adopted in December 2009. The full strategy can be found on Council's web site http://www.cairns.qld.gov.au/content/waterWaste/waste/waste_strategy.html

Challenge 1 – waste generation is increasing

Council data indicates that waste generation rates have increased in the Cairns area by 23% between 2004/5 and 2008/9. However, waste generation rates in any one year can be dramatically influenced by natural disasters such as major flood events and cyclones such as Cyclone Larry in 2006. This type of event should be accommodated in reviewing statistical trends.

Challenge 2 - Queensland's size and population distribution

Far North Queensland in particular has significant cost barriers in developing local markets due to economies of scale, and delivering recycled products to markets due to the large distance to be traveled. We would encourage the development of programs and frameworks under the strategy that assist in these aspects.

Challenge 3 - Encouraging industry investment and greater involvement from businesses

Council agrees with the notion of encouraging business investment in waste management but is concerned that the role of achieving this will be thrust to some extent upon local government. In CRC case, Council does not actively participate in the commercial waste and recycling markets and has limited direct influence on this sector.

Should the strategy place more responsibility with Councils for attracting and encouraging industry involvement, then appropriate funding and support frameworks should be delivered by the State to Council.

Challenge 4 - Reducing the climate change impacts of waste management

CRC has in place an alternate waste treatment technology where all organic kerbside waste is aerobically composted and diverted from landfill. Council consistently achieves over 50% diversion of kerbside waste from landfill.

The composting plant operated by Sita Environmental Solutions also composts significant quantities of organic commercial waste.

Challenge 5 - Getting the legislative framework right

Council agrees that there is need for legislative reform to promote waste avoidance and recycling. Further comments are provided on the options identified in the strategy later in this submission.

Challenge 6 - Meeting infrastructure needs

No comment.

Challenge 7 - Changing the way we look at business as usual

Council agrees with the proposed paradigm shift in approach to waste management as not being business as usual in an effort to gain improvement.

2. Changing the focus

Council agrees with the 9 options listed that could be put in place to improve waste management across the state. We would encourage detailed consultation with Council in the development of policies or frameworks to achieve these changes so that Far North Queensland factors are taken into consideration.

In particular, changes such as product stewardship should be encouraged but the potential transport issues with the distance to market, and impacts on consumer prices need to be well managed.

Guiding principles

Council agrees with the general thrust of the guiding principles. When identifying local solutions for local issues, recognition of the lack of economies of scale in regional areas may need particular assistance from State Government. Similarly when encouraging shared responsibility, appropriate resources need to be provided so Local Government and others can adequately fulfill their responsibilities.

Strategic tools

Council supports the user pays principles but has in the past received considerable concern from residents over the potential price impacts of achieving full cost recovery. Current approaches and legislative frameworks encourage cross-subsidy

rather than full user pays. Future directions should be designed to encourage user pays.

3. The Vision

Council supports the Strategy Vision and Strategy Aims.

3.2 *Working in partnerships*

Council is encouraged by the recognition of the role of all levels of government and industry in waste and resource management. Cairns has been at the forefront of waste management with the development of the AWT and MRF and has approached the State Government previously to obtain partnership assistance to explore co-generation opportunities. Our experience has been that the State did not encourage and was not willing to greatly assist the Council in exploring the opportunity for co-generation.

While Council has developed some partnerships locally, the issue of forming partnerships with industry can be problematic for Local Government. As identified in the strategy, Councils generally do not participate in the commercial waste sector. However, Councils are often required to take on commercial waste management in areas where commercial operators may not deem activities viable. This is often done with cross-subsidisation from residential waste customers. Attention to this area would be beneficial in future actions under the strategy.

In addition, forming partnerships with industry players who are operating in the regions can be limited due to procurement requirements under the provisions of the Local Government Act. In most instances Councils are required to obtain quotations or go to tender for projects. The effort involved in developing detailed specifications for Councils, and developing tender responses for the industry often prohibits opportunities being explored and realized.

Consideration in the development of the new legislation of actions that facilitate partnership development would be encouraged. For example setting up of state-wide 'preferred suppliers' that are able to be used may assist in direct partnerships being formed with local industry providers while still achieving value for money outcomes.

3.3 *Strengthening the legislation*

Council supports a review and re-write of the legislation governing waste and resource management. The key potential impacts in the proposed changes relate to the industry waste levy. It is noted in the companion document *Proposed Industry Waste Levy Consultation Draft* that operators of landfills and transfer stations will be responsible for the collection of the levy and there will be penalties for failing to meet the requirements of the new Act.

Council is concerned at the increased cost of administering the levy and the details of how this scheme is to be operated. We hope that avenues to recover additional costs will be made available either through the levy itself or other means. It is also hoped that further detailed consultation on the details of the process of collection and

reporting will occur in regional Queensland to assist in the development of a scheme that achieves the desired outcomes.

Council also believes that introduction of the levy, and possible other waste avoidance initiatives will increase the instances of illegal waste dumping. Providing Councils with the ability to resource additional monitoring and enforcement action will be essential to limiting these impacts.

The application of the levy to sewage sludges (biosolids) for Councils in the wet tropics needs to be clarified. CRC has in place a biosolids reuse program where a large percentage of the biosolids is aerobically composted with the remainder being utilized in agriculture. However, during the wet season farms are not able to be accessed and the only remaining viable option is landfill disposal. Exemptions for this occurrence should be considered.

3.4 Engagement, information and knowledge management

Council notes the desire to develop standardized and robust data collection and reporting systems via the strategy. There will no doubt be an increased burden on Councils to participate in these revised systems. The ability for Councils to be compensated or alternatively resourced by the State to perform these functions would be desirable. Similarly, participation by regional Councils in the development of these revised systems is seen as critical to the success of future reporting systems.

4. Taking Action

Priority strategic actions

Councils agree with the three priority action areas and offers the following comments on the specific questions posed in the Strategy.

Waste Avoidance targets:

The target to reverse the trend for increases in waste generation is relatively non-specific and could be strengthened by reference to an actual figure.

Similarly the waste per capita target could be more specific rather than just reduce from current levels.

Waste recovery targets:

CRC has diverted over 60% of municipal waste from landfill for the last 3 years so is well on track to achieve the 65% target by 2020.

The methodology for the levels that have been set is not explained in the strategy document. The capacity to achieve the targets is also not well explained. For example, it is not clear what infrastructure and capacity would need to be built to enable 75% of construction and demolition waste to be recycled. Hence it is difficult to comment on whether the targets can actually be met.

It is also not clear whether the targets are across the state or on a region by region basis. If the State Government is looking to achieve the targets across the State, then it is not clear whether the intention is to focus efforts on highly populated areas.

Targets could also be set for greenwaste to encourage recycling of these organics.

Disposal target

The target proposed would be difficult to measure as litter and illegal dumping is not point deposited. Diversion from landfill targets may be more appropriate.