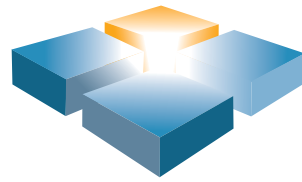


*invigorating*



CHAMBER OF  
COMMERCE &  
INDUSTRY  
QUEENSLAND

## From Waste to Resource

Changing the way business views waste



Invigorating Business

**Blueprint for Waste Avoidance, Recovery  
and Management in Queensland**  
August 2010



Printed on 100% recycled paper stock



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*"We need to generate and maintain the desire to take responsible action on waste, in which we share a sense that what we do to reduce or better manage waste – as designers, as producers, as retailers, as purchasers, and consumers – will make a real difference to the things we care about."*

*"This blueprint is about changing the way we think about waste and turning it into an economic opportunity – about taking action now so that we can maintain the liveability and economic prosperity for all Queenslanders into the future."*

*David Goodwin  
President, CCIQ*



## 1.0 INTRODUCTION

1.1 The Chamber of Commerce and Industry Queensland (CCIQ) is strongly supportive of the development of a clear, well-defined waste management strategy for Queensland. Queensland businesses are strongly committed to balancing environmental sustainability with economic prosperity and recognise their role in minimising the impact of their activities on the environment.

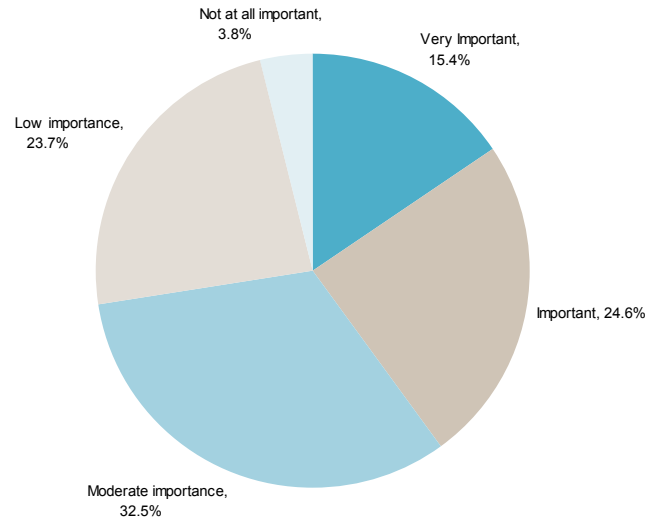
1.2 In March 2010 as part of the Commonwealth Bank sponsored Pulse Survey of Business Conditions, CCIQ undertook a study to identify the current practices and attitudes of Queensland businesses towards the environment and environmental and sustainability issues. Overwhelmingly business indicated a strong commitment to environmental sustainability and that it has become part of best practice business management.

1.3 Forty per cent of businesses consider environmental issues and sustainability to be very important or important to their business. A further 32.5 per cent considered it to be of moderate importance and only 27.5 per cent of businesses considered environmental issues to be of low or no importance to their business. A sense of community obligation and the company's own business needs were the major factors driving participation in environmental management and sustainability programs.

1.4 However, despite a strong desire to do so, cost and time were the single greatest barriers for greater participation in environmental management and sustainability programs. Complexity and lack of expertise are also factors preventing greater uptake. It follows that the success of any environmental program, including the proposed Queensland Waste Strategy, relies on broad community commitment and awareness to drive change and a positive benefit to cost ratio.

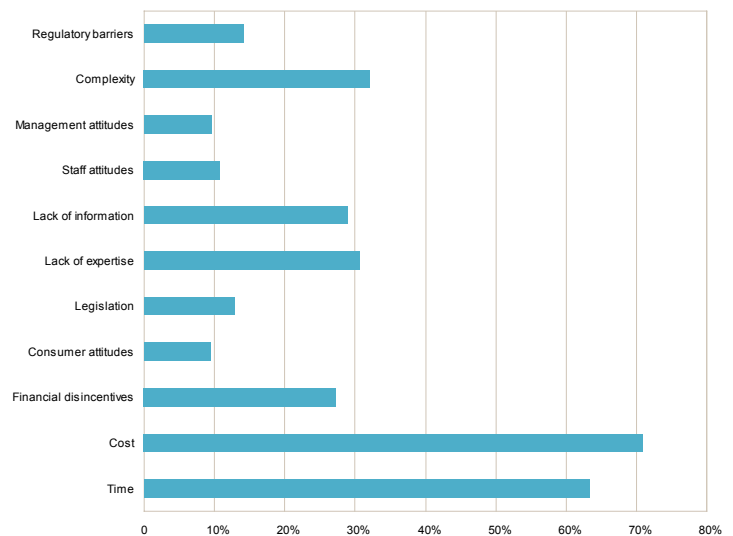
1.5 The Queensland Waste Strategy will not only provide greater certainty to the business community on their rights and responsibilities for waste generation and disposal but may also provide an opportunity for businesses to reduce their waste management costs and lead to new market opportunities. Queensland businesses therefore have a vested interest in best practise waste management strategies.

### Importance of Environmental Issues and Sustainability to Business



Source: Commonwealth Bank CCIQ Pulse Survey of Business Conditions March Quarter 2010

### Barriers to Greater Environmental Management and Eco-Efficiency for Business



Source: March Pulse Survey

- 1.6 CCIQ advocates a number of fundamental principles, outlined below, which we believe should underpin Queensland's waste management strategy. CCIQ believes it is important that industry and government work together to achieve positive environmental outcomes and meet waste management and efficiency targets in accordance with these principles. CCIQ has and will continue to work cooperatively with the Queensland Government to address environmental and waste issues and ensure the Queensland Waste Strategy leads to positive outcomes and resource efficiency in Queensland.

### CCIQ Principles for Waste Management in Queensland

- > All members of the Queensland community must bear a fair and equitable share of the responsibility for addressing issues related to waste generation and disposal.
- > Societal change should be at the centre of the strategy as without mechanisms to change the behaviours and waste practices of all members and sectors of the community, Queensland will fail to achieve any significant improvement in waste outcomes. Appropriate incentives and pricing signals should be provided to all members of the community to drive societal change.
- > Actions, initiatives and programs should directly reflect the objectives and targets outlined in the strategy and a clear link should be established between proposed strategies and the intended outcomes and goals.
- > A recognition that there is no 'one size fits all' solution to waste generation and resource efficiency. This is particularly important given Queensland's dispersed population and varying population densities. The policy response must also be flexible enough to allow for regional and product-specific variations.
- > A comprehensive, transparent and consistent methodology and approach for measuring and reporting on waste generation and recovery must be adopted in Queensland prior to the finalisation and implementation of the Waste Strategy and associated targets and policies. Commitment to regular public reporting which includes benchmarking against other jurisdictions and evaluation of the strategy is also fundamental to achieving long term best waste practice across the community.
- > A whole-of-government approach to the issues of waste generation and resource efficiency must be adopted. This should be broader than agencies simply practicing waste minimisation and must include consideration of waste issues across all areas of policy and service delivery. In those instances where government regulation and policy prevents industry from implementing more efficient waste practices, there should be a concurrent process across government to review regulatory requirements which do not complement environmental aspirations.
- > Business and industry must be actively involved in the development, implementation and subsequent review of any Queensland Waste Strategy.
- > Rigorous assessment of the benefits and costs of the proposed strategy and its associated measures must be undertaken prior to its implementation. Any assessment must also account for current costs of waste management and recovery. Where the costs (economic, social and environmental) of a particular measure exceed the benefits, it must not be adopted in its proposed form.
- > Stakeholders, including business and local government, must be given sufficient time to adjust to any mandatory requirements and be well informed of their options and responsibilities for waste management. Infrastructure and required services must be available and accessible before expectations and targets are imposed on stakeholders.



## 2.0 INDUSTRY WASTE PROFILES AND DATA

- 2.1 CCIQ from the outset would like to express a general dissatisfaction with the current reporting of waste data in the draft waste strategy discussion paper. We believe that the information and data presented is inconsistent and therefore misleading and does not present the reality of waste generation and reuse in Queensland, especially for the business and commercial sources. CCIQ firmly believes that good and just policy development processes accurate information and informed policy debate across the community. As such the discussion paper does not achieve this objective and can only lead us to the assessment that this discussion paper was developed and written simply to justify the government's introduction of the commercial waste levy.
- 2.2 CCIQ has undertaken a through review of the state and national annual waste reports and other research available on waste in Queensland. According to the National Waste Report 2010, business and industry sends comparatively less waste to landfill than other sectors. Municipal waste was the largest component of the 4.302 million tonnes of waste sent to landfill in Queensland for 2006-07, accounting for 1.7 million tonnes or 40 per cent. Construction and demolition contributed 34 per cent and commercial and industrial waste only 26 per cent.\*
- 2.3 Our research also found that Queensland businesses are out performing other sectors in the efficient management and recovery of their waste. According to the National Waste Report 2010, of the 3.779 million tonnes recovered in Queensland in 2006-07, the commercial and industrial stream contributed nearly half (48 per cent) to this effort, while household recycling only accounted for 36 per cent and construction and demolition the remaining 16 per cent. This represents a net landfill diversion rate of over 50 per cent achieved by business and industry, compared to the rate of recovery on kerbside waste collected from domestic premises which is only 21 per cent.

Recovered in Qld (2006/07)	Waste Stream	Million Tonnes	% of total weight
	Municipal	1.365	36%
	Commercial and Industrial	1.797	48%
	Construction and Demolition	0.617	16%
	<b>TOTAL</b>	<b>3.779</b>	
Landfilled in Qld (2006/07)	Waste Stream	Million Tonnes	% of total weight
	Municipal	1.735	40%
	Commercial and Industrial	1.101	26%
	Construction and Demolition	1.466	34%
	<b>TOTAL</b>	<b>4.302</b>	

Source: National Waste Report Card 2010

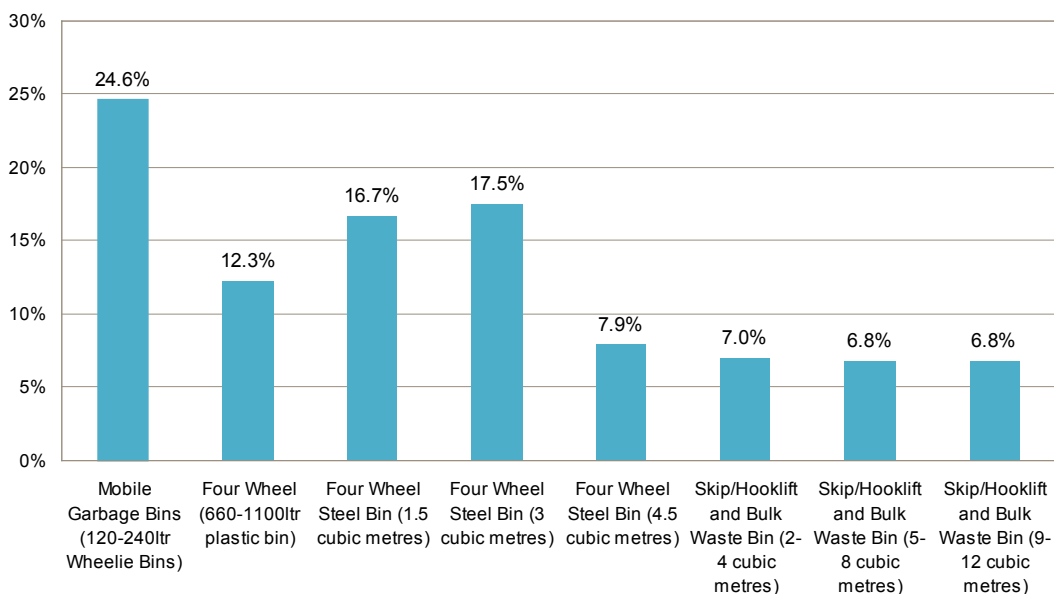
- 2.4 Furthermore Queensland businesses have outperformed households in minimising and reducing the impact of their waste on the environment. The State of Waste and Recycling in Queensland 2008: Technical Report notes that there has been a steady increase in the amount of household waste produced over the past five years. During the period 2003-04 to 2007-08 household waste increased by 40 per cent. Only part of this increase can be attributed to population growth (which increased by only 10 per cent over the five year period) and more so to increased household consumption. In contrast, the amount of commercial and industrial waste reported appears to have stabilised, despite population and business growth and has even shown a slight reduction of approximately 2-3 per cent over the past three years.
- 2.5 However we acknowledge that Queensland businesses do still send over a million tonnes of general waste to local councils and commercial landfills each year and that little of this is subsequently recovered. As acknowledged in the Queensland Waste and Recycling Report Card 2007-2008 this is mainly because most of the recoverable and recyclable waste is diverted by businesses and sent directly to recyclers and composters. CCIQ also strongly believe this figure may be attributed to an absence of recovery services, particularly in regional areas, and poor information

\*The Australian Government's reporting methodology was considered more comprehensive and accurate as (unlike the Queensland Government's Waste and Recycling Report Card) it included private sector waste and resource contractor data.

and advice provided to businesses on waste recovery opportunities. Nonetheless Queensland businesses, in partnership with households, government and other sectors, will still need to make a contribution to the reduction of waste if Queensland is to move towards a zero waste future.

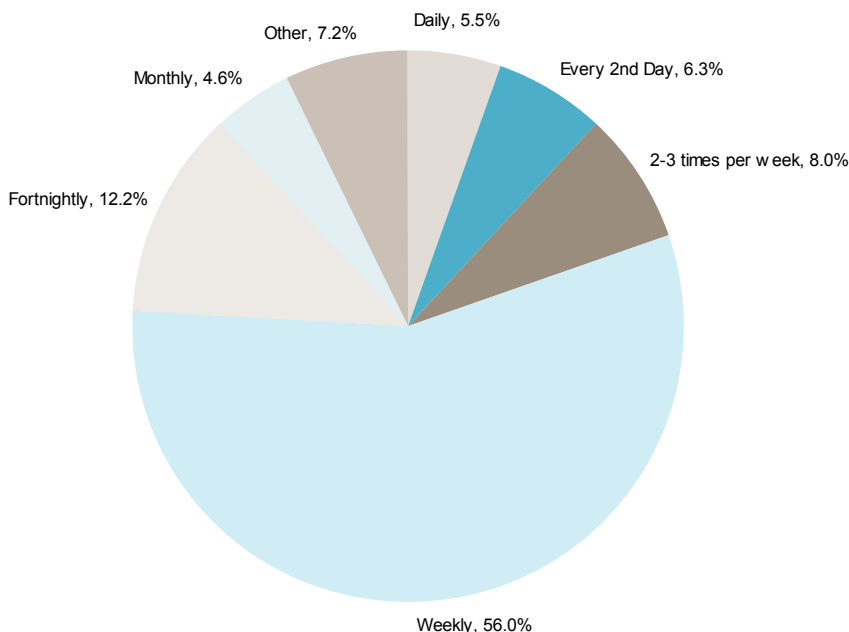
- 2.6 In July 2010 CCIQ interviewed over 300 members to gain a greater understanding of current waste and recycling practices of Queensland businesses. The survey provides further evidence of a commitment to best practice waste management and strong business participation in recycling and reuse schemes.
- 2.7 Most businesses use 1-2 Wheelie Bins (120-240ltr) or one Four Wheel Steel Bin (1.5-3 cubic metres) at their business premise for general waste and these bins are most commonly emptied on a weekly basis. While the majority of businesses indicated their bins are mostly fully at the time of collection, CCIQ believes it to be an issue for the introduction of the commercial waste levy that general waste bins are not full at the time of collection for nearly half the businesses responding to the survey.

**Size of bins used for mixed general waste by each business premise?**



Source: CCIQ Survey on Business Waste Practices, July 2010

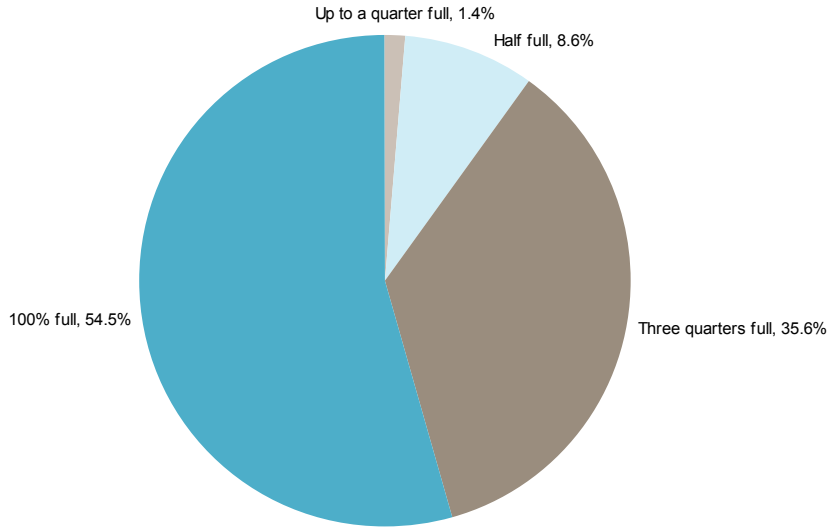
**Frequency of bin collection from business premises**



Source: CCIQ Survey on Business Waste Practices, July 2010



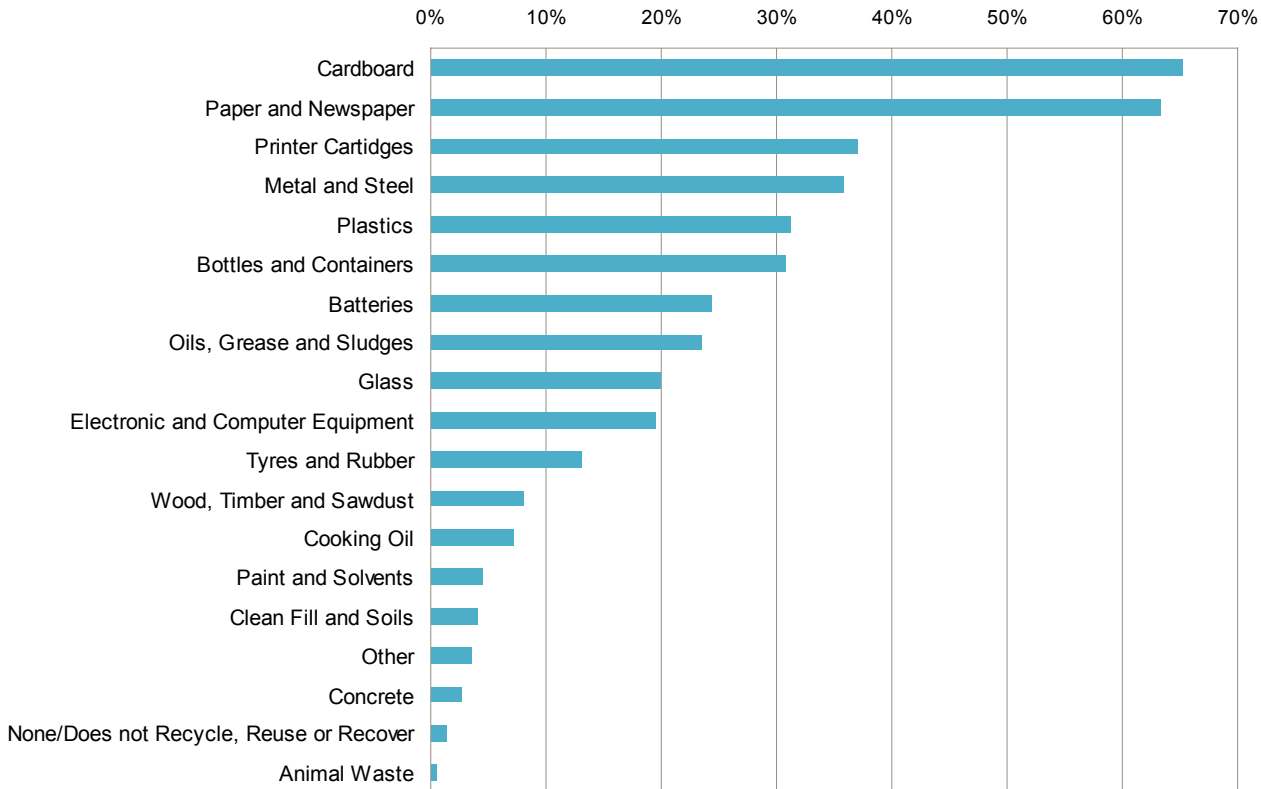
### Average fullness of general waste bins at the time of collection



Source: CCIQ Survey on Business Waste Practices, July 2010

2.8 Businesses most commonly recycle, reuse and recover cardboard, paper and newspaper, printer cartridges, metals and steel, plastics, and bottles and containers. The least common materials recovered were animal waste, concrete, clean fill and soils and paint and solvents. Other materials recycled included green waste, hair, old furnishings and concrete tiles. Only 2.3 per cent of respondents indicated they did not participate in any recycling and waste recovery schemes.

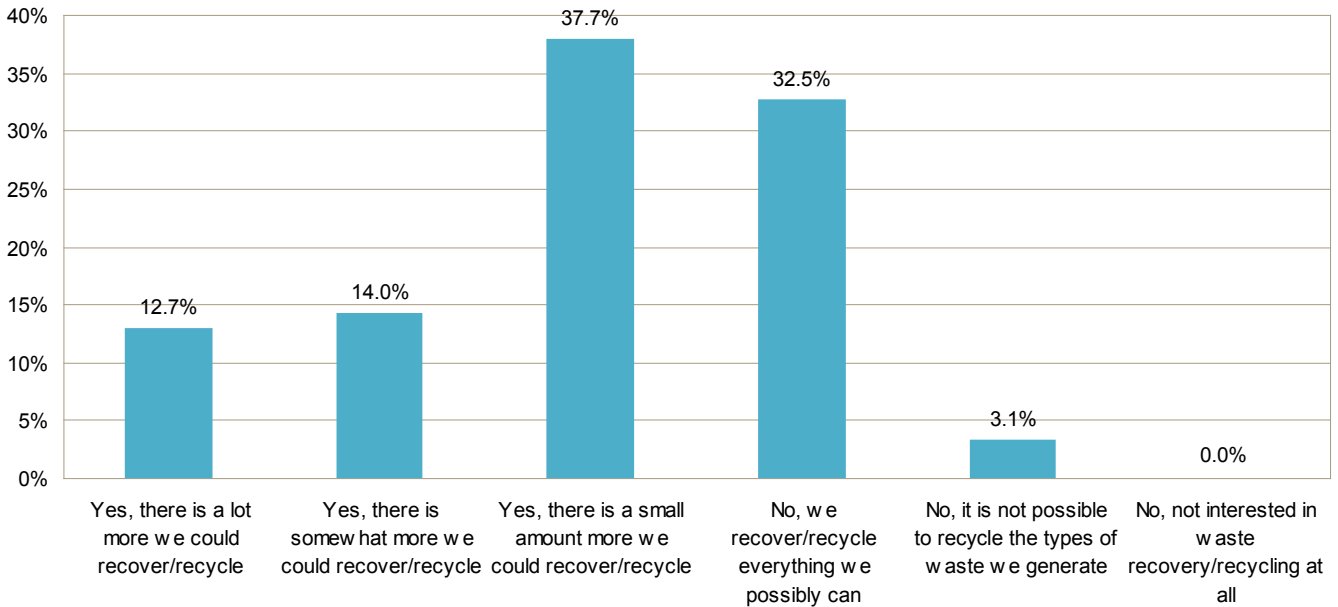
### Materials currently recycled, reused and recovered by Queensland businesses



Source: CCIQ Survey on Business Waste Practices, July 2010

2.9 The majority of Queensland businesses also believed they had limited to no capacity to further recycle, reuse or recover waste materials and reduce their landfill waste. 32.5 per cent of respondents indicated they currently recover and recycle all materials possible within their business. There were no businesses responding to the survey who indicated they had no interest in recycling or waste recovery, however 3.1 per cent indicated that there was no recycling, reuse and recovery scheme available in their region for the type of waste their business generated.

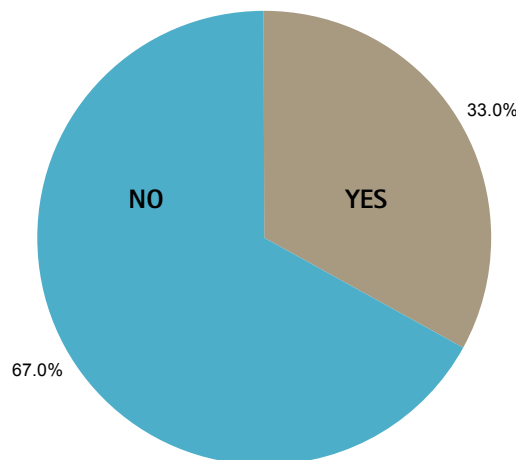
**Business capacity to further reduce landfill waste and increase recycling, reuse and recovery**



Source: CCIQ Survey on Business Waste Practices, July 2010

2.10 A strong majority of businesses (67 per cent) do not support the introduction of the commercial waste levy and did not believe the imposition of this levy would encourage change in waste management behaviours. Accordingly feedback suggested a high level of resentment towards DERM and the Queensland Government for penalising the business community through the commercial waste levy when they are already actively participating in waste recovery at their own cost.

**Will the proposed commercial waste levy encourage you to change your waste management behaviours and recover more waste?**



Source: CCIQ Survey on Business Waste Practices, July 2010



- 2.11 However, CCIQ are also aware that a significant proportion of the business community, especially small and medium sized business owners/operators have little understanding of their waste contractor arrangements and associated costs. It has also been the experience of staff in CCIQ's sustainability team that in the shadow of emissions monitoring and management, water efficiency and energy efficiency and with a lack of promotion, waste management issues have been overlooked by many in the business community. With little understanding of the gravity of the overall issue business owners/operators are not well equipped to deal with the issue of waste management without some external assistance. Therefore the introduction of a waste disposal levy will need to be accompanied by a simplification of waste contracts and an increase in transparency between business owners/operators and waste contractors.
- 2.12 CCIQ surveyed its members to determine the level of interest from business owners in receiving assistance to identify opportunities to reduce/recover waste and save on waste management costs. Nearly 60 per cent of businesses supported the introduction of a government funded Business Waste Audit program and many businesses commented that they require assistance in understanding opportunities for achieving greater waste efficiency and accessing resource recovery services.

### Business Case Study

Business "A" has been actively engaged in eco-efficiency practices for the past 5 years including participating in multiple state and federal government efficiency programs. Their certified Environmental Management System incorporates waste efficiency / management and as a result they have been operating in accordance with best practice solid and liquid waste management for several years.

For this business the impending waste levy will represent a waste disposal cost increase of around \$830 / year, even at the conservative conversion estimate of \$5 / m<sup>3</sup> for general waste.

The business owner has expressed his concern that there appears to be no mention of a levy discount for those businesses that are able to demonstrate best practice waste management. The business owner is certain that the levy alone will not be enough to encourage investment in best practice waste management and that a levy discount for those businesses who are able to achieve best practice, may help to provide the necessary motivation.



### 3.0 DRAFT QUEENSLAND WASTE STRATEGY 2010–2020

- 3.1 As previously stated, CCIQ supports in principal the development of a new Waste Management Strategy for Queensland. Queensland businesses share the community's concern for the state's current and future waste management challenges. Queensland businesses understand that escalating waste generation, limited waste diversion, and high landfill rates are unsustainable and will have a significant impact on economic prosperity and liveability in Queensland. Accordingly the Queensland business community has and will continue to strive towards best practice waste management and welcomes the opportunity to work with the State Government to improve Queensland's waste outlook.
- 3.2 CCIQ believes the draft Waste Strategy can be improved in several ways. Our key concerns with the current draft Queensland Waste Strategy, which will be expanded on further in this section, include:
- > Unlike other jurisdictions in Australia and internationally which state long term aspirations of achieving a 'zero waste' outcome, the Queensland Waste Strategy does not articulate any such goal. Furthermore, despite it being a ten year strategy none of the priority actions extend past 2012.
  - > Does not address the need for societal change which should be central to the whole strategy and without which targets and long term outcomes will not be achieved. Again this is a significant departure from national and international strategies which have proven success when societal change is effected.
  - > Targets need to better reflect current waste situations and should be strengthened to drive outcomes equally across all sectors of the community. Consistent application of measurement bases need to be reflected in the targets.
  - > Regulatory and punitive approach has been taken rather than an engagement, consultative and partnership approach. International research has demonstrated that long term societal change can only be effected when all members of the community are active and equal partners in the solution.
  - > More effort to establish partnership and collaboration with the business community is needed and at present there is insufficient direct support provided to assist businesses to adapt to best practice waste management. Accordingly it would seem that the business community are being forced to compensate other waste generators, support industry development in other sectors and subsidise the delivery of council waste services and infrastructure.
  - > Actions are not linked to strategic goals and targets or at least there is not a clear articulation or transparency in how the proposed actions and initiatives are to achieve the desired waste outcomes.
  - > There is limited commitment and process established for evaluation, measurement, and public reporting against the strategy.
- 3.3 These issues should be addressed in the final Waste Strategy to ensure Queensland can lead the rest of the country in waste and resource management and to substantially protect our environment, lifestyle and economic prosperity for future generations.
- 3.4 That being said, CCIQ believes there are a number of positive aspects to the strategy. We support the adoption of the waste hierarchy as a key element for guiding waste and resource management practices in Queensland. We also agree that waste avoidance and reduction should be the highest priority for waste management in Queensland. CCIQ also supports the principle of user or "polluter" pays and further believe that without full transparency in the full and actual cost of waste management there will be little incentive for all members of the community to change their waste habits. CCIQ is also strongly supportive of local solutions and a partnership approach to achieving the resource efficiency and efficient waste management systems.



## Strategic goals, objectives and targets

- 3.5 The aim of the strategy as stated in the draft is to "drive a decade of significant improvement in waste and resource management in Queensland". CCIQ believes this is a significant departure from the goals being established in other jurisdictions in Australia and the rest of the world and as such may result in Queensland falling behind other jurisdictions in waste outcomes over the next decade. For example:
- > The Australian Capital Territory (ACT) goal is for "a waste free society by 2010" meaning a 95 per cent reuse and diversion target;
  - > For Victoria it is "to be well advanced along the pathway of becoming a low waste society by 2014";
  - > In South Australia the strategy and legislation establishes that "Zero waste is a goal to achieve zero discharge, zero material waste and zero atmospheric damage";
  - > The Western Australian Government has established a goal to "move towards a zero waste society" and a long term vision for "all Western Australians to live in a waste free society";
  - > New Zealand has established a "zero waste by 2020" goal meaning no waste to landfill or incineration;
  - > In Scotland they aim "to achieve a zero waste Scotland over the next ten years"; and
  - > Kamikatsu, Japan has established a 'Zero Waste Declaration', meaning no waste to landfill or incineration by 2020.
- 3.6 Ambitious and long term targets are a critical success factor. Therefore the Queensland Government needs to set an ambitious waste prevention target and adopt policies to ensure that it is met. CCIQ would like the Government to adopt a long term strategic vision to achieve "Zero Waste in 10 Years" consistent with world best waste policy and practice.
- 3.7 The draft Queensland Waste Strategy proposes new targets for waste management: reverse the overall trend for an overall increase in waste generation, reduce per capita generation of waste, recycling targets for municipal, commercial and industrial and construction and demolition waste streams, and reduction in greenhouse gas and landfill emissions. CCIQ supports the use of targets as a tool for driving progress in waste efficiency. However we believe the targets established in the draft strategy are not ambitious enough and not applied to the correct base for measurement and outcomes.
- 3.8 Primarily we express concern that the targets are based on "recycling" for municipal, commercial and industrial and construction and demolition waste. Firstly we believe the base for these targets should not be "recycling" and prefer for targets to be set for "landfill diversion". Waste generators from the community and across business sectors and industries produce very different types of waste products and as such have varying capacity to "recycle" waste but may have greater capacity to reduce landfill and waste emissions through avoidance, reduction and reuse. A narrow focus on "recycling" may exclude some sectors and limit incentives to avoid, reduce and reuse waste products.
- 3.9 Furthermore the "recycling" targets are based on incorrect and misleading baseline data. In particular for the commercial and industrial streams it bases current 2008 performance only on the recovery rate of waste received by local councils and omits the waste diverted by businesses and sent directly to private sector recyclers and composters. Based on the Queensland Government's own data, the correct 2007-08 commercial and industrial recycling and reuse rate is 55 per cent (Queensland Waste and Recycling Report Card 2007-2008).
- 3.10 On this basis we also support establishing much higher targets for landfill diversion across each of the waste streams. Evidence from other jurisdictions shows that much higher targets are achievable. For example, Canberra recovers 73 per cent of the city's total waste. The Belgian region of Flanders is already recovering 71 per cent of its municipal solid waste (MSW). In Kamikatsu, Japan, 75-80 per cent of household waste is recycled or composted. These examples also serve to demonstrate that the Queensland Government's targets are not ambitious enough. In 10 years (by 2020) Queensland's waste recovery rates will only have just reached the levels that other jurisdictions have already reached.

- 3.11 Finally we believe more specific analysis needs to be conducted on the specific components or streams of waste and recycling across Queensland. Priority targets should then be established for each of these streams based on ease of recovery, capacity for recover and current infrastructure. For example other governments have defined targets for newspaper, cardboard and plastic shopping bags. CCIQ supports the establishment of specific progressive targets for newspaper, cardboard and paper, plastic (including shopping bags), and glass. As Queensland currently has very low recycling rates for organic waste compared to international jurisdictions, organic waste should be a further priority area for reduction.

## Business Engagement and Participation

- 3.12 Business and industry is a key stakeholder in Queensland's Waste Strategy. Undoubtedly achieving significant reductions in waste and landfill will require commitment and action from all Queensland businesses. However CCIQ believes the Queensland Government must improve its understanding of the waste streams generated and the waste management behaviours of business and industry before finalising the Queensland Waste Strategy. More effort must also be made to establish partnership and collaboration with the business community and more actions and initiatives identified to assist businesses adapt to best practice waste management.
- 3.13 CCIQ believe that the business community are being forced to compensate other waste generators, support industry development in other sectors and subsidise the delivery of council waste services and infrastructure.
- 3.14 CCIQ does not wish to downplay the fact that business and industry contribute to Queensland waste and landfill totals (commercial and industrial sector contributed approximately 26 per cent and construction and demolition 34 per cent to the total landfill in 2007-08) and agree that Queensland businesses must take proactive action and be key partners in the strategy to avoid, reduce, reuse, recycle and dispose efficiently the waste they generate.
- 3.15 However CCIQ believes the Queensland Waste Strategy needs to be more business focused in the following ways:
- > As discussed previously in this Blueprint, the Draft Waste Strategy must report waste generation, landfill and landfill diversion data accurately and acknowledge the true waste management efforts of Queensland businesses.
  - > Queensland Government must make an effort to better understand the waste practices of Queensland businesses. There are a lot of incorrect assumptions made throughout the draft strategy about waste generation and waste management. CCIQ recommend a comprehensive review and assessment, with the assistance of industry associations, be completed to gain a better understanding of the types of waste generated, the extent and types of waste recovered and methods of recovery, and opportunities and limitations for waste minimisation and greater recovery.
  - > There is a significant lack of appreciation for the diversity of businesses within and across industries and sectors. Every business in Queensland will have varying degrees to which they can achieve waste avoidance, reduction and recovery. Therefore as part of the strategy targeted industry and sector specific targets and waste management plans should be developed which reflect priority waste streams for each sectors. This is a key strategy included in the ACT, NSW, South Australian and New Zealand Waste Strategies.
  - > Businesses need to be supported to understand their waste behaviours and identify opportunities for waste avoidance, reduction and recovery. Every business in Queensland therefore should have access to a Government supported waste audit program and high waste users should be required to prepare a waste management plan. This approach has proven successful in reducing water and energy consumption and, while initially met with reservation, the business community now readily acknowledge the benefit of such programs in reducing resource use and delivering cost savings to business. Again business waste audits have been key components of waste strategies in ACT, South Australia, Western Australia, New Zealand, the UK and Canada.



- > Finally businesses achieving best practice and delivering above waste targets should be acknowledged and rewarded. Currently there is a clear lack of incentives built into the Waste Strategy framework to encourage businesses to change behaviour and invest in best waste policy and practice. CCIQ recommend a reducing waste levy or waste levy subsidy/refund for those businesses who can reduce their waste beyond targets or prior to target timeframes.

### Business Case Study

Business "B" recycles and recovers everything possible across their multiple business sites around Queensland. They have invested in cardboard compactors for all sites, have researched and implemented technologies to breakdown and reuse the off-cuts and by-products of their manufacturing processes, and they collect and on-sell scrap metals, ink cartridges, tyres, and batteries. The owner believes that over the past 10-15 years they have more than halved their general waste. The waste that does remain mostly results from packaging of component parts sourced overseas and as such neither they nor Queensland Government regulation could influence or change the waste practices of their international supply chains.

For this business the impending waste levy will represent a waste disposal cost increase of over \$10,000 based on a volumetric conversion rate of \$5 / m<sup>3</sup> for general waste.

The business owner has expressed their concern that the imposition of the levy will not lead to any further reductions in their waste and given the significant financial imposition may force them to reconsider current recycling and recovery practices to reduce business costs.

### Societal Change and Community Commitment

- 3.16 Numerous international studies have concluded that waste efficiency can only be achieved when there is collective action driving broad cultural change in the way that all individuals and businesses view and manage waste. While many people, organisations and businesses enthusiastically promote and practice waste minimisation, a greater majority currently do little or just the bare minimum to reduce waste and landfill.
- 3.17 CCIQ does not believe enough emphasis has been placed on societal change beyond simple information and promotion. Changing how we deal with our waste requires action by every Queenslanders as individuals in their role as consumers, employers and employees and householders at work, school and leisure.
- 3.18 The South Australian Government acknowledged the central role of societal change in their Waste Strategy stating "Simply providing information will not influence people to adopt more sustainable waste behaviours... considerable effort and innovation must be devoted towards fostering attitudes and behaviours that encourage people to change and adopt resource efficient behaviours". Accordingly cultural change is the number one strategic objective and priority in the South Australian Waste Strategy.
- 3.19 To align Queensland's Waste Strategy with international best practice, CCIQ recommends 'Societal Change and Community Commitment' be included as the number one goal for the strategy.

As such the goal statement would read:

1. Societal Change and Community Commitment
2. Avoid and reduce waste
3. Optimise recovery and recycling
4. Develop sustainable waste industries and jobs
5. Foster sustainable partnerships

- 3.20 Associated with the goal for societal change, CCIQ would also like to see more commitment to proactive measures and innovative solutions to encourage and drive cultural change. In addition to increasing awareness of waste issues, CCIQ believe the strategy could include the following actions and initiatives aimed at both the household and business sectors:
- > Provision of innovative and cost effective alternatives for waste disposal. In the case of households this should include additional recycling and reuse facilities such as organic waste and composting alternatives and business access to existing council kerbside recyclable collections. CCIQ also supports the introduction of deposit/refund schemes for recyclables including aluminium and plastic bottles.
  - > Review of government imposed requirements which prevent and inhibit cultural change. For example many food safety, food handling and packaging requirements significantly increase waste generation and prevent consumers from demanding waste reduction from business. Additionally many Workplace Health and Safety requirements prevent or make difficult waste separation and recovery efforts in workplaces.
  - > Introduction of stronger pricing signals to householders for waste disposal and reduction. Noting the reported inefficiencies preventing councils from passing on waste levies to householders, CCIQ supports unit pricing mechanisms including variable frequency of collection, variable bin volume, and pre-purchased garbage bag or bag tag schemes as options for Queensland. Other jurisdictions already provide different sized bins for kerbside waste production (although few have variable pricing attached) and many European countries have successful pre-purchased garbage bag schemes all proving successful in increasing awareness of waste generation and facilitating waste reduction.
  - > CCIQ also believes the government should demonstrate genuine commitment to waste avoidance and commit to a ban on plastic shopping bags as has been the policy in South Australia since 2009. Further product and landfill bans should also be investigated.
  - > Rewards for successful waste minimisation and reduction. This would include declining waste levy tariffs and subsidies and refunds for waste efficiency. CCIQ have also identified a number of penalty schemes operating in other jurisdictions that could be applicable to Queensland. For example, regional and local councils who fail to meet annual targets for waste reduction should be fined a financial penalty which in turn could be passed on to residents through current waste charges. This would inspire collective community responsibility for reducing individual waste and increasing resource recovery.
  - > Public recognition of innovative ideas and successful outcomes. For businesses this could include an industry endorsed waste efficiency rating scheme (associated with waste audits management plans, and advisory services) which would provide market incentives for businesses to improve waste efficiency and assist consumers in making purchasing decisions based on waste outcomes. CCIQ would avail themselves to be involved and lead in the implementation of this type of program as a service and benefit to the Queensland business community.

### Monitoring, Evaluation and Review

- 3.21 Monitoring and reporting on progress and regular evaluation of the strategy are vital to ensuring Queensland meets targets for waste and resource efficiency.
- 3.22 CCIQ is concerned with the existing waste reporting framework and the quality of the data collected on waste in Queensland. As has been acknowledged in the Waste Strategy itself, "the quality of information about the make-up of waste streams and trends (in Queensland) generally remains poor". CCIQ also notes that there is considerable inconsistency in the format and the timing of waste reporting completed by DERM.



- 3.23 The momentum to achieve the 2020 targets can only be maintained with the support of the community. Regular feedback on actions and achievements will be essential to maintain community support and help identify potential problems. Therefore CCIQ recommends:
- > The development of a comprehensive methodology for collecting data on waste generation and management in Queensland. This methodology should be expanded to ensure it collects a comprehensive profile of the wastes generated across all streams and sources and should also include calculation and measurement of the environmental costs associated with collecting, treating and disposing of wastes in Queensland.
  - > Establishment and commitment to an annual reporting period and timeframe for public notification of progress towards actions, deliverables and targets. CCIQ also recommend a consistent format for reporting and notification.
  - > CCIQ would also strongly recommend investigation into opportunities to report on individual household and business waste efficiency in a similar way to current reporting on water and energy usage. This may in the first instance need to be based on local area or suburb specific data.
  - > CCIQ recommend the Queensland Government commit to a periodic evaluation and review of the strategy every 3-5 years and that this be reflected in the strategies action plan.
- 3.24 A final area of concern to CCIQ is that the action plan does not articulate the linkages and connections between the actions and initiatives outlined and the goals and strategic objectives in the strategy. As such it is unclear how the proposed actions will achieve the desired waste avoidance and reduction outcomes. On face value CCIQ does not believe the current strategy will achieve any significant improvement in waste management and that further thought needs to be given to actions and strategies that will deliver real outcomes that protect the environment and inspire a generation of cultural change and commitment to waste and resource efficiency.

### Business Case Study

Business owner "C" is a domestic builder who claims that the recovery of viable waste material on a busy worksite where safety issues and compliance with workplace health and safety regulations are of prime and immediate consideration would come at a considerable cost. The separation of salvageable materials would require separate containers, sorting and storage until collection, which on building sites in residential areas with restricted space is impossible.

"For these reasons it would be highly unlikely that those in the building industry would see the commercial waste levy as anything other than an additional cost they must bear... it would also further increase the cost of housing in the Queensland market." Business Owner



## 4.0 COMMERCIAL WASTE LEVY

- 4.1 CCIQ agrees in principle to a "user pays" approach to waste management and supports the use of pricing signals to drive improved waste management practices. However CCIQ does not believe there is a strong case for the introduction of the proposed commercial waste levy, if applied solely to the business community. CCIQ does however believe there is a strong argument and significant precedent for the levy to be applied equally to all members of the community including households and local councils. CCIQ argues that:
- > Queensland will be the only state in Australia that will not apply a levy to households. This is also a significant departure from international policy directions.
  - > Queensland households contribute the greater proportion of total landfill amounts (40 per cent compared to 34 per cent from construction and demolition and 26 per cent from commercial and industrial sources).
  - > Household waste has grown by 40 per cent over the past 5 years, only part of which can be attributed to population growth which has increased by 10 per cent over this period. In contrast the amount of commercial and industrial waste has remained fairly constant over the past few years despite economic and population growth.
  - > Businesses outperform households in recovering waste for recycling and reuse. In 2007-2008 the rate of waste recovery for commercial and industrial waste was 55 per cent compared to a much lower rate of 21 per cent for household waste.
  - > The Waste Contractors and Recyclers Association of Queensland have argued that there are a number of practical examples of how excluding households from the waste levy will create an unworkable waste collection situation in Queensland.
  - > Due to lack of required infrastructure and policy direction, the current waste levy as proposed will not deliver any significant improvement in waste management as it is misaligned with business and community behaviour and provides no incentive or opportunity for individuals to change their waste management practices.
  - > The majority of the benefit from the \$96 million per year raised through the levy will be afforded to the community through the Waste Avoidance and Resources Efficiency (WARE) and Sustainable Futures Fund (SFF) funds and only a small proportion of the funds are currently proposed for direct assistance to the businesses paying the levy.
- 4.2 Accordingly CCIQ believe that through this levy, the business community are being forced to compensate other waste generators, support industry development in the waste sector and subsidise the delivery of council waste services and infrastructure. The current Waste Strategy development process provides an opportunity for Queensland to move forward with waste management and implement world best waste management practice and policy. Therefore irrespective of political motivations, CCIQ believe we must move to full cost recovery for waste management and pass on waste costs equally and fairly to all members of the community.
- 4.3 The introduction of a waste levy to both household and the business sector is strongly recommended and must be a policy pursued by the Queensland Government.
- 4.4 Currently householders do not pay for the actual cost of waste removal and disposal. For example in the Brisbane City Council area ratepayers pay a flat waste management fee of approximately \$240 per year regardless of how much waste they dispose or recycle. This equates to a waste collection and disposal and environmental management cost of approximately \$11 per cubic metre of general rubbish and recyclables. Currently the cost to Queensland businesses for waste collection and disposal and environmental management is approximately \$23-\$27 per cubic metre. Unlike Queensland households who do not pay any additional charge for recycling, Queensland businesses must pay extra for recovery, recycling and reuse services.



- 4.5 Charging householders for the amount of waste they put out for disposal has the potential to dramatically change the way individuals perceive their waste production and how they manage it. Variable charging schemes have been implemented in many European countries including Austria, Belgium, Denmark, France, Germany, Ireland, Italy, Luxembourg and Sweden, and have had a significant impact, increasing recycling by 30–40 per cent. As households represent the majority of the growth in waste and landfill over the past 5 years and also recover comparatively less waste for reuse and recycling there is a compelling need to provide an appropriate price signal to households to encourage more efficient waste management.
- 4.6 The Queensland Government and Regional Councils have a number of tools available to them to pass on the waste levy and price signals for waste disposal to the household sector, some of these have been recommended in Section 3.20 of this Blueprint.

### Waste Levy Implementation Issues

- 4.7 CCIQ believe there are a number of implementation issues which, if left unresolved, will not provide the desired pricing signals to industry nor the incentives to drive improved waste and resource efficiency required to achieve waste and landfill minimisation targets.
- 4.8 Our primary concern is the absence of any clear direction on how the proposed weight based levy, which is to be charged to the waste collectors/contractors at the point of disposal, will be passed on to the businesses where the waste is collected. At present business waste is not measured in weight but rather a crude volumetric measure based on full bin capacity. Accordingly only a rough estimate can currently be made of a business's total waste, calculated irrespective of the extent to which the bin is filled at the time of collection and the material content of the bin. As the total weight of a waste truck when it reaches the disposal/landfill site combines the waste of many businesses with varying bin sizes, bin fullness and waste types, CCIQ does not believe it appropriate for the waste levy to be passed on as a flat rate or fee to the business nor would a volumetric waste conversion formula as has been proposed by DERM be supported. Neither of these options will pass on a pricing signal to businesses and would in fact act as a disincentive for businesses to consider other alternatives to waste disposal. These mechanisms also provide for potential profiteering by the waste contractors. CCIQ therefore firmly believe technologies which provide for the individual weighting of each businesses waste at the point of collection must be the adopted mechanism for passing on the waste levy.

#### Business Case Study

Business "D" has 35 employees and produces around 650 cubic metres of general commercial waste per annum. The vast majority of this waste is low density material such as saw dust, particle board and timber and material off-cuts. The business owners have requested waste volume and mass information from their waste contractor in the past and have been told that because their waste is collected on the same run as several other commercial and residential customers, the information is not available. According to the business owner their current waste collection contract due to expire in 2013 is not terribly well suited to their current needs. They have complained to the waste contractor about a lack of transparency and consistency as far as billing practices are concerned and have received no valid response.

The business owners are concerned that their waste contractor will not have the ability to assign an accurate levy amount to their waste collection contract and are also concerned that a volume based calculation will work against them given the comparatively low density of their waste.

- 4.9 Businesses operating within larger shopping complexes or group title premises are often not provided a choice of waste contractor and commonly share responsibility for the waste collection costs, again irrespective of the amount of waste they contribute to the total pool for the complex or group title premise. The Queensland Government should also work with shopping complex and group title owners to develop better mechanisms for measuring waste and passing on waste costs.

- 4.10 A further issue raised with us by our members is the nature of some contracts for waste collection. Members have provided examples where they are locked into long term contracts which have defined collection frequencies irrespective of the fullness of the bin, where businesses are fined or charged extra if they attempt to change or reduce frequencies or cancel scheduled collections, and where contracts include fine print and provisions allowing contractors to increase collection prices as they see fit and to automatically rollover contracts at expiry without advising customers. CCIQ is also aware of local council areas where the local council deems the preferred waste collection service for a particular region thus limiting the choice and flexibility for businesses. If we are to move to a waste efficient future then businesses must be afforded the flexibility to reduce their waste and a competitive environment where they have the freedom to choose and change between waste contractors to meet their waste disposal needs. CCIQ recommends that waste contractors not be allowed to enter into contracts with their customers and that the Queensland Government investigate mechanisms to regulate the waste industry and protect consumers rights and freedoms.
- 4.11 Finally without sufficient waste and recovery infrastructure and services the commercial waste levy represents a 100 per cent cost imposition for businesses. This is the scenario for most regional areas of the state where businesses have reported having either limited or no opportunities for waste recovery, reuse and recycling.

### Regulatory Impact of the Commercial Waste Levy

- 4.12 The Queensland Government has estimated that the additional cost for general businesses (those not disposing of regulated waste) to be around \$101 per year and for businesses generating regulated hazardous the cost increase to be between \$118 and \$227 per year. CCIQ has collected data and information from our members which indicate that these costs are grossly underestimated, especially given the issues associated with lack of technology to pass on an accurate weighted cost to businesses as discussed above in Section 4.8.
- 4.13 It is important that data accuracy can be assured prior to announcing any average cost increase figure. Business owner/operators may be lured into a false sense of security by the figure thus hampering preparations and reducing the impact of the levy's introduction. CCIQ have roughly calculated the possible annual increase in waste management costs for Queensland businesses using a conservative volumetric levy conversion factor of \$5 / m<sup>3</sup>.
- 4.14 CCIQ cautions against analysing the regulatory impacts of the proposed commercial waste levy based on "average" business waste disposal volumes. As the following table on page 20, demonstrates there is a significant variation in the costs to business depending on the size and number of bins and the frequency of collection.



## Estimated Levy Charges for Business

Wheeler Bins (240ltr)	No of Bins	Collections per week						
		1	2	3	4	5	6	7 (daily)
	1	\$62	\$125	\$187	\$250	\$312	\$374	\$437
	2	\$125	\$250	\$374	\$499	\$624	\$749	\$874
	4	\$250	\$499	\$749	\$998	\$1,248	\$1,498	\$1,747
	6	\$374	\$749	\$1,123	\$1,498	\$1,872	\$2,246	\$2,621
	8	\$499	\$998	\$1,498	\$1,997	\$2,496	\$2,995	\$3,494
	10	\$624	\$1,248	\$1,872	\$2,496	\$3,120	\$3,744	\$4,368
Four Wheel Steel Bin (3 cubic metres)	No of Bins	Collections per week						
		0.25 (Monthly)	0.5 (Fortnightly)	1	2	3	5	7 (daily)
	1	\$195	\$390	\$780	\$1,560	\$2,340	\$3,900	\$5,460
	2	\$390	\$780	\$1,560	\$3,120	\$4,680	\$7,800	\$10,920
	4	\$780	\$1,560	\$3,120	\$6,240	\$9,360	\$15,600	\$21,840
	6	\$1,170	\$2,340	\$4,680	\$9,360	\$14,040	\$23,400	\$32,760
	8	\$1,560	\$3,120	\$6,240	\$12,480	\$18,720	\$31,200	\$43,680
	10	\$1,950	\$3,900	\$7,800	\$15,600	\$23,400	\$39,000	\$54,600
Skip/Hooklift and Bulk Waste Bin (8 cubic metres)	No of Bins	Collections per week						
		0.25 (Monthly)	0.5 (Fortnightly)	1	2	3	5	7 (daily)
	1	\$520	\$1,040	\$2,080	\$4,160	\$6,240	\$10,400	\$14,560
	2	\$1,040	\$2,080	\$4,160	\$8,320	\$12,480	\$20,800	\$29,120
	4	\$2,080	\$4,160	\$8,320	\$16,640	\$24,960	\$41,600	\$58,240
	6	\$3,120	\$6,240	\$12,480	\$24,960	\$37,440	\$62,400	\$87,360
	8	\$4,160	\$8,320	\$16,640	\$33,280	\$49,920	\$83,200	\$116,480
	10	\$5,200	\$10,400	\$20,800	\$41,600	\$62,400	\$104,000	\$145,600

*\*\*This table represents the three most common sized bins used by businesses in Queensland based on results from the CCIQ Snap Poll on Waste and Resource Management, July 2010*

4.15 Global financial uncertainty and rising energy, water and raw material costs have combined to make for challenging business conditions in Queensland. Availability of funds will be the biggest hurdle for most businesses and will hamper the uptake of waste efficiency technologies, especially within the small to medium sector. The provision of financial assistance through government grants or subsidies may assist in the uptake of waste management technologies.

4.16 The majority of businesses will need to focus on low cost behaviour based initiatives in the short term and many will require external advice in order to find the greatest efficiency gains. Workshopping and education will be an essential part of the implementation of the strategy and will ensure the best result for business and the state. Partnering with state and local chambers of commerce and industry groups will allow for an increased understanding of key issues and potential solutions and will improve the broader business response.

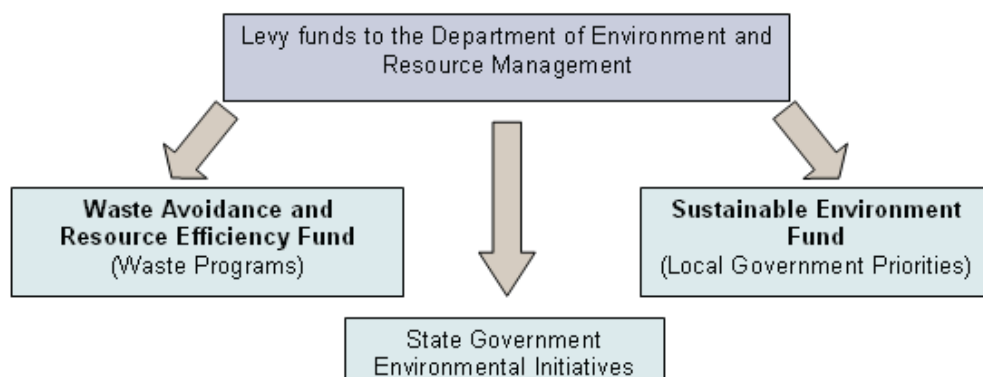
### Waste Levy Revenue Distribution

4.17 The Queensland Government has estimated the revenue from the Commercial Waste Levy to be approximately \$96 million per year (or \$379 million over the four years from 2011-12)\*\*. The state government proposes to distribute levy revenue across three program areas being:

- > Waste Avoidance and Resource Efficiency Fund (WARE) - \$159 million (41 per cent of total revenue)
- > Local Government Sustainable Future Fund - \$120 million (31 per cent of total revenue)
- > Q2 Environmental Fund - \$100 million (28 per cent of total revenue) which has already been allocated in the 2010-11 State Budget to deliver the Queensland Government's Koala Response Strategy, to buy and manage additional national parks and green spaces and expansion of the Wild River Rangers Program.

*\*\*Note: An additional 49 staff have been included in the 2010-11 State Budget for the implementation of the Queensland Waste Reform Strategy and associated programs/funds.*

## Distribution of Levy Funds



Source: Queensland Government Waste Strategy 2010-2020, Proposed Industry Waste Levy Consultation Draft

- 4.18 CCIQ agrees with the strong feedback provided by respondents to the CCIQ Waste Survey that all revenue raised through the commercial waste levy must be directed back towards supporting the business community in reducing waste and accessing improved resource recovery and recycling services. CCIQ strongly objects to \$100 million or nearly a third of the revenue being directed to general environmental projects, especially when the state's waste management and resource recovery infrastructure, services and industry are so underdeveloped and when business in regional areas have no access to any recovery and recycling options. While limited information is currently available, the same opposition is expressed for the Local Government Sustainable Future Fund (\$120 million and a further 31 per cent) if this too is to fund general environmental projects at the local and regional level. Collectively these two programs would represent nearly 60 per cent of the revenue from the commercial waste levy being used for general environmental outcomes and not dedicated waste avoidance and reduction measures.
- 4.19 The use of the commercial waste levy revenue for anything other than to directly deliver waste avoidance, reduction and recovery is unacceptable and makes questionable the real level of commitment of this government to achieving sustainable waste outcomes.
- 4.20 CCIQ provides in principle support for the establishment of the Waste Avoidance and Resource Efficiency Fund (WARE). With only limited detail currently available on the funding programs to be delivered through the WARE fund, it is hard to assess the contribution this fund will make to achieving waste avoidance, reduction and recovery outcomes. However CCIQ recommends that the priorities for this fund should include:
- > Ensuring there is adequate low cost recovery, reuse and recycling services and infrastructure available for businesses and the community to access.
  - > Providing the businesses bearing the burden of this levy, especially small and medium businesses, with services and tools to help them assess their waste management practices, identify waste avoidance and recovery opportunities and access waste services. As suggested in Section 3.15, this fund should support an industry-led Waste Audit and Management Plan Program which was supported by nearly 60 per cent of businesses responding the CCIQ Waste Survey.
  - > Implementing the required technology and systems to accurately measure and record business waste at the point of collection. This may require retrofitting of waste contractors trucks and/or waste bins to ensure all businesses are charged fairly for the waste they generate and that there are appropriate pricing signals and incentives to encourage businesses to reduce their waste.
  - > Investigation and implementation of mechanisms and systems to adequately pass on pricing signals and incentives to the household and domestic sector to encourage waste reduction and greater uptake of waste recovery, reuse and recycling in this sector.



## 5.0 CCIQ'S POSITION SUMMARY & CONCLUSION

- 5.1 CCIQ is strongly supportive of the development of a Waste Management Strategy for Queensland provided it balances the required environmental outcomes with the need to maintain a strong competitive and productive economy and provides adequate support to Queensland businesses, particularly small and medium enterprises, to adapt to best practice waste management.
- 5.2 Meeting targets for waste avoidance, reduction and recovery requires a partnership approach between all key stakeholders including business, government and the community. Each sector must equally share responsibility for achieving the zero waste future required to protect Queensland's sustainability, liveability and economic prosperity. CCIQ stands ready to work with the Queensland Government to address environmental and waste issues and ensure the Queensland Waste Strategy leads to positive outcomes and resource efficiency in Queensland.

### KEY RECOMMENDATIONS

- |    |  |
|----|--|
| R1 | The Waste Levy be introduced and applied to the household, government and business sectors to achieve a shared responsibility for, and a fair and balanced approach to waste management in Queensland.   |
| R2 | Revenue from the Waste Levy be dedicated solely to achieving waste avoidance, recovery and management and not general environmental projects. As a priority all members of the community across all regions of the state must have access to low cost recovery, reuse and recycling infrastructure and services.   |
| R3 | Improved engagement and partnership with the business community including targeted support and programs to assist businesses to understand their waste behaviour and identify opportunities for waste avoidance, reduction and recovery. This should also involve: <ul style="list-style-type: none"> <li>&gt; In collaboration with industry associations, a comprehensive review be undertaken of industry and sectoral waste generation and management trends and assessment of opportunities and limitations for waste minimisation and recovery;</li> <li>&gt; Provision of a government supported waste audit program and assistance with adopting waste management processes and accessing suitable avoidance, recovery and reuse services; and</li> <li>&gt; Recognition and reward programs for businesses demonstrating leadership and achieving best practice in waste management.</li> </ul> |
| R4 | The Queensland Government commit to the development of a comprehensive methodology for collecting waste and recovery data and improved reporting and provision of public information on waste to achieve greater transparency.   |
| R5 | The Queensland Government adopt stronger waste targets reflecting accurate and consistent baseline data and including a long term strategic vision for achieving a 'zero waste' outcome for Queensland. In particular: <ul style="list-style-type: none"> <li>&gt; The base for targets should be landfill diversion rather than recycling to reflect the diverse waste products and capacity for recycling across stakeholder groups;</li> <li>&gt; Priority targets should be established for different waste streams including organic, newspaper, cardboard and plastic shopping bags;</li> <li>&gt; Industry and sector specific targets and waste management plans be developed in collaboration with business sectors and industry associations.</li> </ul>   |
| R6 | Provision of a comprehensive suite of programs to assist and encourage both the residential and commercial sectors to avoid, recycle and reuse a greater proportion of their waste and provide effective incentives to all members of the community to meet waste reduction targets including: <ul style="list-style-type: none"> <li>&gt; Introduction of stronger pricing signals for all sectors including the household sector and greater transparency for waste collection costs and charges;</li> <li>&gt; Provision of innovative and cost effective alternatives for waste disposal such as organic waste and composting alternatives and deposit/refund schemes for particular waste streams; and</li> <li>&gt; Review of government imposed requirements and regulations which prevent and inhibit change to waste practices.</li> </ul>  |
| R7 | Societal change be central to all waste strategies and initiatives and a greater commitment to proactive measures and innovative solutions to encourage and drive change in waste generation, recovery and management be adopted.  |
| R8 | Apply best practice principles to all future strategies and initiatives for waste management in Queensland.  |

### Respondent Quotes from the CCIQ Waste Survey

"A blanket approach is not the answer, and if anything would reduce a business's willingness to recycle. Recycling costs a business time and money, if we're going to be charged anyway we would just throw the whole lot in the bin and be done with it, so our employees can get back to work."

"As a metal roofing business we recycle all our waste metal including off cuts from new construction. We also recycle everything we remove from re-roofs except asbestos... so I ask what more can we do?"

"I work in a commercial building with eight other tenants. There are approximately 30 staff in our building and we only manage to fill one large bin of general rubbish each week. Compare that to the 4-6 recycling wheelies we fill. I don't see how slugging small business with another 'tax' will change what we're already doing, which is probably more than most households."

"Most of our waste (which is not recycled) is light packaging e.g. foam and general staff waste. How would a weight-based levy work without weighing the rubbish? A volume based estimate would be inaccurate."

"All funds from the levy should be directed to ensuring improved waste management and recycling outcomes, not general revenue or "motherhood" environmental wish lists."

"If the current council would introduce recycling facilities for our waste we would be able to recycle much more especially glass, paper and cardboard. To charge us when a service is not available is appalling."

"We are very aware of the need to recycle and already do everything we can... we see the government's move as no more than a tax grab."

"The cost of our skip collection is steadily increasing and has risen from about \$16/m to \$26/m over the last 2 years."

"Our office like many others is part of a body corporate, so we have no control over how other tenants use/fill the bins. A charge like this will encourage small businesses to put their rubbish in the neighbour's bin or to dump it on the side of the road to avoid the charge."



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Chamber of Commerce & Industry Queensland (CCIQ) represents over 25,000 businesses in Queensland. We are committed to ensuring our customers have the right tools to achieve real results in their business.

At CCIQ we harness the results of our research, lobbying and policy achievements to offer the best possible business support solutions to invigorate growth statewide, nationally and globally. By joining CCIQ you support the organisation that supports the Queensland business community.

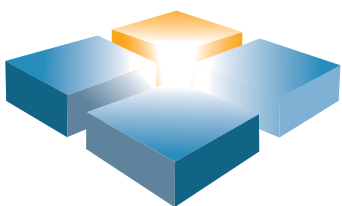
Membership also ensures you are an integral part of an organisation dedicated to providing first class services to assist Queensland industry with relevant and practical business solutions. Not only is membership your connection to information, industry best practice, training and consultancy services, it also allows you to take advantage of the many benefits CCIQ offers.



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