

Queensland's Waste Strategy 2010-2020 Comments

General direction

The overall direction of the Strategy is very good. We agree with the Strategy's vision, aim and goals which are comprehensive and provide the appropriate direction for the strategy. However, while the principles of the waste strategy are in accordance with waste hierarchy, there are limited new actions which will make any large impact on waste generation. It is acknowledged that avoidance is difficult to achieve, however a full range of potential tools appears not to have been considered through the draft strategy.

It is suggested that the term 'downcycle' (recycling a product for a lower value use) may be useful to be included in the waste management hierarchy.

Targets

- We agree with the first three targets of the strategy (reverse annual waste generation, reduce per capita waste, reduce litter and illegal dumping) but note these will need to be quantified at some stage to allow goal setting and performance management.
- It is believed that Ipswich City Council's operations (including its municipal solid waste services) can achieve the proposed recover and recycle targets without a financial burden.
- The targets for recover and recycle need to be further explored. We certainly agree that recovery and recycling activities need to be promoted and increased. However waste avoidance must be promoted as the first waste management option. Recovery and recycling targets could actually deter the implementation of waste avoidance options. For example if a local government significantly reduces the amount of C&I waste it produces by designing out the excessive use of paper by such means as replacing paper hand towels with dryers, encouraging more on screen work rather than printing etc. landfilled waste would be reduced. However the overall percentage of recycled and recovered C&I waste could actually be reduced from these avoidance activities. The targets should be about reducing the amount of residual waste that gets disposed to landfill not just increasing recycling & recovery.
- Issues around how binding targets are, and whether they are broken down to regional or other levels need to be resolved. Local government considers itself a key stakeholder for such a process and would expect to be consulted.
- The concept of a greenwaste target is supported, however it would need to be framed in terms of a target to minimise the amount of greenwaste going to landfill, not to minimise or maximise the amount of greenwaste processed/recycled etc. For example, the target could be that waste to

landfill comprises less than 3% greenwaste (this value is chosen for example purposes only).

- Setting a target around illegal dumping or littering would need to be based on a litter survey or similar in order to avoid reporting bias associated with using an indicator like the number of illegal dumping complaints received from residents. As with all targets, a target should only be set for illegal dumping if it can be supported by necessary resourcing and strategy required to achieve the target.

Choices for the future

General direction looks OK. We will need to see the detail within the Strategic Business Plan to make any useful comments on this.

Working in partnership

- The general concept of needing to work in partnership with all stakeholders is totally supported.
- Provision of funding to assist local governments to develop and implement their waste management strategic plans will be of great value to local governments.
- The establishment of consistent data collection system to accurately report on waste data is an extremely important issue and needs a lot of attention. Various attempts have been made by regional groups and the state to develop consistent data sets with limited success. There needs to be very detailed specifications on how the data is reported. Stakeholder liaison will be critical, since data definitions and requirements, as well as reporting format etc can have significant business implications. Note also the infrastructure requirements around weighbridges and integration into computer systems/financial systems of the landfill operators so that operators can report accurately and with a minimum of manual data manipulation/handling.

Strengthening the legislation

There are two views within Council about the suggested approach for the provision of legislation that promotes waste minimisation.

One group supports the need for specific waste minimisation regulation under the provisions of the Environmental Protection Act. This approach has been working effectively within other states of Australia to drive change in waste management behaviour. Specific waste minimisation regulation would provide the needed focus on waste minimisation – not just get buried as a new section within the Act.

A second view is that the proposal to create a separate piece of legislation for waste avoidance and resource efficiency may not be the most user friendly approach. Industry is familiar with the *Environmental Protection Act*, which means that a minor change to the object of the EP Act and then incorporation of proposed waste avoidance and resource efficiency provisions could be more user friendly. Having additional pieces of legislation to comply with can be confusing for industry, even if ultimately the provisions are identical.

Taking action

Action 2 – Statewide litter prevention strategy

- The potential ban on release of balloons for Qld Government events should be extended to a ban on release of all lighter than air balloons for all events held in the state of Queensland, not just Qld government events (or Qld Government sponsored events).
- The current exemption of free newspapers and catalogues etc from the EP Act definition of litter is problematic. The solution may not be to change the EP Act definition of litter, but the work identified in Action 2 with catalogue association and community newspaper publishers/distributors needs to be based on the approach that if industry agreement and self regulation cannot achieve the desired outcome, then a regulatory response may be required. The issue of free newspaper and catalogue litter has been a significant source of resident complaints to Council for a number of years.

Action 4 – Strategic waste management planning

- The review of waste legislation provides an opportunity to update the requirements for Council to develop and periodically review waste management strategy. Specifically, there is an opportunity for clear inclusion of the waste hierarchy in the way Council deals with waste generated from Council activities (construction, office operation etc), as well as waste generated by the community which is handled by local government in accordance with funding programs.

Action 5 – Improvement and performance payments

These payment are an excellent means of providing incentives for local governments to improve waste minimisation performance. rewards would need to be significant enough to actually drive change. If rewards are too small to drive behaviour change, then they would be a poor investment by Qld government.

Action 6 – Local Government assessment and mitigation funding program

Such a program will be of great assistance to local governments to provide the means to upgrade infrastructure to improve waste minimisation outcomes.

Action 7 – Alternative waste treatment technology

This action shouldn't be limited to local government. Principles/guidelines for decision making would apply to the whole waste sector. Note also that guidelines are only valuable if they are filling an identified gap. Has research been undertaken to determine that there really is a gap which guidance material could fill?

Actions 8 – 10 - Illegal dumping

- Illegal dumping is a very difficult issue to address and needs well resourced coordinated and innovative approaches to reduce its incidence. There needs to be more emphasis placed on landowners to minimise access to their properties which allows illegal dumping to occur.
- It will be critical to establish clear roles, responsibilities and criteria for this program. Uncertainty about roles and responsibilities can be very inefficient for both DERM and local government.
- In meeting DERM's commitment to consider the potential impacts of illegal dumping, it will be particularly important for the Qld Government to communicate to the community that asbestos is not captured by the levy. This will minimise risk of increased illegal dumping. Avenues for education could be targeted at owner builder course content (administered by QBSA) and other QBSA publications/professional certification for builders and tradespeople. It may also be appropriate to reinforce the message through the existing Queensland Health information available in relation to asbestos handling and disposal.

Action 9 – Enhance litter and illegal dumping compliance program

- Strategic assistance would be valuable, however if this action simply involves enforcement resources being deployed to identified hotspots to issue PINs, then there is probably little value in this action.
- When reviewing evidence provisions around vehicle littering, it would be valuable to confirm that PINs can be issued by an authorised officer based on recorded CCTV evidence, rather than an authorised officer needing to be a real-time eyewitness to an offence.

Identification of priority products

- Investigation and consideration of landfill bans for certain priority products is strongly supported (where impacts of landfill disposal are unacceptable, and alternative preferable disposal methods exist).

Action 18 – Plastic bag management program

- Stronger action needs to be taken on the management of plastic bags. The ideal solution for environmental outcomes would be to ban the use of non-compostable bags within the state. This would also assist in reducing contamination of future green waste and organic services. After sufficient education, the community needs to be consulted on whether such a ban would be supported.

Waste levy

- The concept of linking the annual levy increase to CPI is supported. When setting the levy amount, there is definite value in clearly articulating when and how the levy will change over time (presumably it will increase). This gives investment certainty to industry, and also sends a clear signal to waste generators that even if they can continue business as usual with the current level of levy without changing their behaviour, they still need to think about behaviour change due to future increases in the levy.
- The exemption on municipal solid waste supported. Local government can achieve stated waste minimisation targets without the need for pricing instruments to force action.
- In particular the exemption of self haul domestic waste is supported due to concerns that a waste levy on self haul domestic waste may result in significant increase in illegal dumping.
- In the instance where the operator of a landfill has invoiced a commercial operator for the cost of the levy, but the landfill operator has not received payment for the levy, then the operator should be able to pass the details of the debt on to the Qld Government for it to pursue if it wishes. Landfill operators should not be forced to act as insurers against bad debt and debt collectors on behalf of the Queensland Government. While it could be argued that this occurs regularly in the construction and other industries where subcontractors are engaged, the critical difference is that such contracts are negotiated on commercial terms and risk is factored in to the contract price. The proposed role of landfill operators as debt collectors is not something which is being negotiated on commercial terms.