



Local Government Association of Queensland
Submission to Department of Environment and Resource
Management

on

Queensland's Waste Strategy 2010-2020: Waste Avoidance
and Recycling Consultation Draft
and
Proposed Industry Waste Levy Consultation Draft

August 2010

Executive Summary

This submission is provided to the Department of Environment and Resource Management (DERM) to provide comment on behalf of local government on *Queensland's Waste Strategy 2010-2020: Waste Avoidance and Recycling Consultation Draft* and the *Proposed Industry Waste Levy Consultation Draft*.

The Association congratulates DERM on the development of the consultation draft and extended period provided in which to respond.

Consultation has been carried out with member councils and several key issues have been raised. The Association will continue to represent local government to ensure that the best outcomes are achieved through the waste strategy and subsequent legislation.

The targets as outlined in the draft strategy are ambitious and local government will require significant investment and time to even come close to achieving these targets. It is appreciated that the targets are aspirational but the government needs to recognise the investment required if these are to be achieved.

A staged implementation or deferred commencement date for the levy in a number of regional councils is recommended to allow for rationalisation of sites and appropriate infrastructure to be prepared. Many regional councils appreciate that significant work is required to rationalise sites and with the levy being announced in June 2010, council budgets for this financial year are already set. Councils need more than twelve months to become levy ready.

Development of the waste and resource recovery industry is essential to ensure that the purpose of the levy is achieved. Councils have strongly expressed the opinion that the funds raised from the levy should be applied to waste and resource recovery strategies and not to environmental initiatives. The Association believes that the first priority should be to waste related activities and that until these have been completed no funding should be directed to other priorities.

Problem waste such as asbestos and tyres are not significantly addressed in the draft strategy. There are limited disposal sites for asbestos in south east Queensland and this results in confusion for industry and, in many cases, illegal or inappropriate tipping of asbestos. Tyres have also become a significant problem for local government across Queensland and levy funds should be directed to these problem wastes to ensure they are treated appropriately.

It is appreciated that the waste levy is not applicable to some waste streams, including domestic waste. Regional councils have raised the issue of farm waste being included as commercial waste and therefore attracting the levy. Farm waste is deposited in small amounts at landfills in regional areas and measuring volumes and applying levies will prove to be an administrative burden. It is recommended that farm waste be exempt from the levy.

Some councils are concerned that if council account holders default on their account payments, then the council will be liable for the levy payment on that waste. This is not acceptable to local government and it is recommended that councils not be liable for third party levy debts.

Residual waste from Materials Recovery Facilities originates from the domestic waste stream and therefore should not be classified as commercial waste as proposed in the draft strategy. It is recommended that residual waste be classified as domestic and therefore levy exempt.

The weight conversion factors are not consistent with weights that are received by local government in Queensland. It is recommended that these be reviewed in consultation with appropriate industry officers and are changed to reflect Queensland conditions.

The Association thanks DERM for the opportunity to comment on the draft waste strategy and proposed waste levy. Local government is a genuine stakeholder in waste management in Queensland and looks forward to working with other stakeholders in the waste sector to improve waste management and resource recovery in the future in Queensland.

LGAQ Waste Strategy Key Principles

Late in 2009, the Association prepared the “LGAQ Waste Strategy Key Principles” to provide information on the issues that the Association felt were essential for inclusion in any waste strategy for Queensland. This submission has been crafted around providing feedback on those key principles. Additional information will be provided where necessary, particularly on the proposed waste levy.

The waste strategy key principles are:

1. Waste Hierarchy

- *The new waste strategy should be developed around the well known waste hierarchy and in particular, using waste avoidance, minimisation and resource recovery as the key objectives.*
- *Associated with this objective, the Association endorses greater application of Extended Producer Responsibility and Product Stewardship as essential to good waste management outcomes.*

The draft strategy makes good reference to the waste hierarchy. As noted in the document, the hierarchy is a decision-support tool that states that avoidance is the preferred option, followed by reduction, reuse, recycling, energy recovery and, finally, disposal.

The Association also appreciates the inclusion of tools such as product stewardship, user pays, local solutions, partnerships, engagement, communication and knowledge management and legislation as being essential to really changing the behaviour around waste management and resource recovery in Queensland.

2. National Policy Issues

- *The Queensland Waste Strategy should have regard to and seek to influence national policy issues including:*
 - a) Extended Producer Responsibility (EPR) and Product Stewardship Schemes (PSS),*
 - b) Container Deposit Legislation (CDL),*
 - c) National Packaging Covenant, and*
 - d) Problem wastes.*
- *LGAQ supports the decision at the recent Environment Protection and Heritage Council meeting to establish a National Waste Strategy based on EPR and PSS with immediate priority on electronic waste and tyres.*
- *LGAQ supports the National Packaging Covenant and encourages the State government to include such schemes in the Queensland strategy and to lobby the Federal government for ongoing support.*
- *LGAQ is opposed to the introduction of Container Deposit Legislation in Queensland on the basis of its high cost, limited impact on the overall waste stream and inequitable impact across the state.*

The strategy notes that product stewardship and extended producer responsibility will be key tools in improving resource recovery for priority products and materials and this

is certainly supported by the Association. The role of price signals in improving resource recovery is also observed and subsequently a levy is proposed for waste sent to landfill. Issues surrounding the levy will be discussed further into this submission.

Container Deposit Legislation is mentioned and the draft strategy notes that such a system could be introduced which is a concern to local government. It is also known that, at its meeting in July 2010, the EPHC resolved to prepare a Consultation Regulatory Impact Statement for CDL. Ministers agreed that a RIS will consider not only CDL, but also a limited number of options which may have a positive cost benefit and a tangible impact on recovery rates and litter reduction.

The possible introduction of CDL to Queensland would have a serious impact on the viability of kerbside recycling services by removing valuable products from the bins. The plastics and aluminium collected through the kerbside recycling system contribute to making the service economically viable in all areas and placing these items in a CDL system would force the close down of kerbside recycling in many areas. Is this really what is wanted for Queensland? These kerbside systems are well established across the state and well accepted by residents. There is no need to introduce a recycling system that belongs in 1970 in the current resource recovery system.

The Association has long been a supporter of the National Packaging Covenant and will most likely again become a signatory to the strengthened Australian Packaging Covenant when it commences in mid 2010. As local government is the main recipient of packaging waste in landfills and kerbside recycling systems, it is essential that we be involved in any program that reviews packaging design and use. The Association looks forward to working with DERM on the new Covenant to ensure better packaging design and resource recovery in the future.

Tools for addressing problem wastes are not really identified in the draft strategy. Problem wastes for local government include, but are not limited to, tyres, electronic waste, asbestos and mattresses. Rural and regional councils have also identified bulky items such as furniture and household goods as being a significant problem at smaller and remote landfills.

The Association is aware that product stewardship schemes for e-waste and tyres are currently being developed and these schemes are fully supported. It is hoped that these industry lead schemes will provide the systems necessary to get these products out of waste streams and into resource recovery programs. However, items such as mattresses are not considered at this time and there is almost no industry in Queensland to cater for these products. They cause considerable issues in landfills by damaging machinery and are bulky and difficult to handle.

The Association will be seeking the support of DERM in applying levy funds from one of the funded programs to develop resource recovery industries for problem wastes where available.

Asbestos is an ongoing problem in Queensland and the strategy has not addressed the issues currently being experienced by local government and industry for the correct disposal of asbestos. There are limited disposal sites for asbestos in south east Queensland and DERM needs to work with local government and industry to ensure that this product is disposed and transported appropriately to minimise risk to public health.

3. Carbon Pollution Reduction Scheme (CPRS) and National Greenhouse and Energy Reporting System

The implications of the CPRS on Local Government need to be considered in the development of the waste strategy to ensure that additional burdens are not placed on councils and ratepayers. Initial estimates conservatively suggest a cost to affected Queensland councils could be in the range of \$16m to \$24m per annum.

CPRS is only mentioned in the section on setting the scene section but seeing the federal government has parked this for the short term, it would have been difficult for this issue to be adequately addressed in the draft strategy.

The general approach of the strategy is to better handle waste and resources so if these principles are followed and supported by a regulatory framework, any implications of a future CPRS would be minimised. The Association is content to work with DERM in the future on handling issues around emissions trading or carbon reduction if and when they are raised at a federal level.

4. Institutional Arrangements

- *Establish a Waste Advisory Panel to advise Government on waste policy, strategy and regulation consisting of representatives of State Government, Local Government and the waste industry.*
- *Regional collaboration amongst councils should be encouraged and supported to promote economies of scope and scale in the development of regional waste facilities and services. Legislative provisions already enable councils to establish regional entities and other collaborative arrangements.*

The strategy notes that a number of groups will be established for implementation. These include a strategic advisory committee and local government reference group.

There is considerable mention of regional collaboration in the strategy and recognition of the problems faced in waste management and resource recovery in regional Queensland. The Association recognises that effective waste management and resource recovery is more likely to be achieved on a regional basis and supports councils working together to achieve best practice outcomes.

It is noted that the Queensland Government will undertake 25 strategic projects in regional Queensland aimed at reducing waste disposal, improving resource recovery and creating 'green' jobs in regional areas. The priority areas of organics processing, material recovery facilities, establishing strategic regional resource recovery infrastructure, local market development and waste processing for construction waste are welcomed and certainly needed.

5. Effective Regulation

- *The waste strategy should incorporate appropriate regulations to drive improved waste management outcomes and consumer behaviour but be developed in recognition of the diverse needs and circumstances of Queensland communities. For example, the "one size fits all" approach currently applied to landfill licensing is inappropriate.*

- *For regulations to be effective there must be public recognition that they are realistic, relevant, appropriate to the circumstances, achievable and able to be implemented by the responsible agencies.*

Issues with the current legislation are addressed and the strategy notes the proposed steps needed to address these issues. It is agreed that the existing legislation is poor and dated and that there is little ability under the current framework for effectively dealing with actions associated with waste avoidance, product stewardship and resource recovery and efficiency.

There is mention that a new Act and associated regulation will be developed to provide the necessary head of power to deliver improved outcomes for waste and resource management in Queensland. This legislative remake is timely and will contribute to a better waste management and resource recovery framework for Queensland. The Association looks forward to working in partnership with DERM to review the legislation to provide an effective suite of tools which can give confidence to state and local government regulation and industry investment.

It is also noted that litter will be addressed in the new strategy. Litter offence provisions need to be strengthened to provide for third party public reporting of vehicle related litter offences. The Association is prepared to work with DERM to ensure better litter legislation. There is a slight contradiction in the strategy with litter - page 25 states that amendments to the Act “will” be made to provide third party reporting whilst page 34 notes that this “could” happen. Local government clearly needs third party reporting provisions for litter. These have been successful in other states and this legislation is needed to ensure consistency across the country.

There is no mention of how the “one size fits all” approach to landfill licensing will be addressed. Rural and regional councils are not sufficiently resourced to carry out landfill activities that are deemed best practice in metropolitan areas. Licensing conditions need to reflect the localised conditions in these communities. It is not proposed that public health be compromised, rather that the issues specific to remote communities be acknowledged and that DERM work in partnership with local councils to ensure the best service possible is provided with the resources available.

6. Best Practice Kerbside Collection and Recycling Systems

- *Kerbside collection systems need to be improved for the collection of organic waste and recyclables.*
- *In particular, new and expanded markets need to be developed with financial assistance for organic wastes and recycling kerbside collectables in regional areas.*

It is noted that the government will establish a competitive grants program to encourage and facilitate industry investment in infrastructure and market development with priority funding areas to possibly include regional infrastructure and market development for recovered concrete, used glass, end-of-life tyres and organic materials. It is also stated that the Queensland Government will work with the organics processing industry to help develop markets and uptake for recycled organic products. The Association supports these initiatives in concept and the competitive grants program will be discussed further in this submission with the levy comments.

Page 37 notes that the Queensland Government will work with local governments and the organics processing industry to design a series of different green and organic waste

collection options (for example, a third kerbside collection bin for green waste only; provision of a kitchen food waste bin and collection of green and food waste using an existing two-bin system with collection in the alternate week to the recycling bin). These options will be tested in selected areas across the state. This is to be commended but these options need to be fully costed in triple bottom line terms to ensure that these services are affordable to the community at large.

There appears to be no mention specifically for expansion of kerbside collection assistance in regional areas but it could be assumed that this would be included in the grants program by assisting industry to develop resource recovery, particularly in regional areas. Whilst some kerbside recycling systems are not viable in economic areas, driving change by industry through this strategy and the associated levy may see more services being economically viable. The Association supports the development of resource recovery sectors, particularly in regional Queensland, to ensure that services provided by local government and industry are cost effective and viable.

7. Alternative Waste Technologies

Research into and incentives for Alternative Waste Disposal technologies should be included in the development of the waste strategy as an alternative to landfill disposal where socially, environmentally and economically viable.

Federal and State Government assistance in the form of subsidies or grants may need to be considered if local government is to be encouraged to utilise these options, where appropriate, in lieu of traditional landfill operations.

The draft strategy notes that the Queensland Government will provide assistance to local governments considering alternative waste technologies by establishing assessment guidelines to aid decision making. This information would be invaluable to local government to ensure that decisions around expensive technology are made with accurate and relevant information.

The use of academic institutions to provide research into alternate treatments where possible is supported and encouraged as there is no commercial advantage in an academic institution providing advice or research findings.

There is no mention of incentives as such in the strategy but the drivers that see alternative waste technologies viable overseas are more likely to come from the federal arena.

8. Infrastructure and Planning

- *Planning for the provision of landfill sites and the location for alternative waste technology facilities requires greater priority in regional planning processes including the need for appropriate zoning, buffering and transport networks for both new and existing sites.*

The executive summary notes that an effective and responsive land-use planning system for waste management infrastructure and activities should be developed. There is recognition that regional plans will play an important role in identifying potentially suitable areas to establish waste and resource management precincts for infrastructure.

Planning and securing waste infrastructure, for both local government and industry, is vital to ensure protection long term of waste management facilities. The strategy does

not really address this as an important issue but the Association would like the government to recognise the importance of securing such facilities. This involves working with the Department of Infrastructure and Planning to ensure that regional plans and planning schemes reflect these needs.

9. Goals and targets

- *Goals and targets, jointly developed and agreed, should be set to provide direction and enable outcomes to be measured.*

Improved measurement against goals and targets will enable better monitoring of policy and strategy to ensure continuous improvement.

The targets noted in the draft strategy are:

- MSW - 50% by 2014, 55% by 2017 and 65% by 2020 (currently 23%)
- C&I - 40% by 2014, 50% by 2017 and 60% by 2020 (currently 18%)
- C&D - 50% by 2014, 60% by 2017 and 75% by 2020 (currently 35%)

Whilst the Association applauds the government for wanting to achieve better resource recovery, the reality is that these targets, mandated or not, will prove difficult for local government to achieve, even in the given time frames and with the possibility of funding.

The councils operating high quality resource recovery systems are currently achieving around 40-50% resource recovery. The only room to move in these councils is for a third bin option for organic waste. This is an extremely expensive option for local government and markets are not yet established to cope with the volume of organic material that could be generated if such kerbside systems were to be introduced in metropolitan areas. Members have expressed concern that the cost of such a service may be difficult to justify.

Another option is for councils to try to recover the recyclable component that is currently in the general waste stream (recyclable material that should be put in a recycling bin but householders, either deliberately or accidentally, place the material in the waste bin). However, to get the community to separate this last component of waste is an expensive and time consuming exercise and funds would be better spent elsewhere in the resource recovery programs. It is also unlikely to return significant volumes to contribute to reaching targets.

Discussions with council officers in local governments that are already achieving high recycling rates indicate that 50-55% would be about as good as could be achieved. Even this target in regional and rural areas will be difficult to achieve.

The Association is not suggesting that these aspirational targets be reduced at this time. However, in the event that the targets are to be mandated, these levels would not be supported and further consultation would be needed at that time to review what resource recovery systems are in place and what targets are realistic.

Page 19 of the draft strategy notes that the targets will reduce climate change impacts of waste disposal by at least 33 per cent for household greenhouse gas landfill emissions and 50 percent for total landfill emissions. The Association questions these figures as current data for landfill emissions is not known. Local government landfill operators know how much gas they capture (for those with gas capture at landfills) but it is not scientifically known how much gas a landfill generates overall. It is suggested

that these figures be removed from the final strategy as they are misleading and unable to be verified.

10. Data collection

- *Improved data collection is required to enable comprehensive waste analysis, policy setting and performance management.*
- *Data collections processes should be more comprehensive than at present seeking input from both public and private sector stakeholders.*

The executive summary notes that the strategy will work toward detailed and accurate data being available for all wastes regardless of source, including construction and demolition and commercial and industrial. This may require legislative amendments to require commercial data to be provided. The Association has long been a supporter of the government obtaining good data to ensure evidence based policy decisions are made and it supports the government in developing whatever tools are required to ensure that appropriate and accurate data is collected.

It is acknowledged that a legislative framework is needed to improve the current data collection and reporting methodologies. The Association will work with DERM to ensure that the amended legislation is appropriate and that local government reporting needs are met.

11. Education

- *Education and awareness campaigns focusing on ‘selling’ waste minimisation and recycling to the community and small to medium sized enterprises are essential and must form part of the new strategy.*

The strategy notes that engagement and education are fundamental to achieving behaviour changes that will translate into better decisions and long-term improved practices. Effective education programs need to focus community wide and not just be aimed at households. Local government has long recognised that effective education programs in waste management and resource recovery lead to better outcomes.

It is also appreciated that the government recognises that current local government education programs are valuable and have formed a significant part of the development of the draft strategy.

Whilst full details of the local government sustainable futures fund are not yet known, the Association encourages the government to further fund effective education programs aimed at all sectors that generate waste.

12. Resourcing

- *Special resourcing and support is required for rural, remote and indigenous councils to assist them move as close as possible to best practice waste management having regard to their particular circumstances and needs.*

The draft strategy notes that many indigenous communities in Queensland either receive no waste management services or have far more limited services than the rest of the Queensland community. It is noted that programs will be implemented that are aimed specifically at improving waste management services and at building local capacity to recycle. The Association appreciates that DERM has recognised these

localised issues and is prepared to develop appropriate programs to put needed changes in place.

The draft strategy also provides an action for an indigenous council area waste removal and litter program. It is also noted that the government is committed to reducing the incidence of illegal dumping across Queensland and will work in partnership with indigenous councils to address the environmental and social issues of illegal dumping occurring on indigenous council land. These programs are certainly welcomed.

13. Economic and Policy Instruments

- *LGAQ is opposed to the imposition of a waste management disposal levy, in particular, on domestic kerbside collected waste as it represents a flat tax on households.*
- *The adoption and implementation of waste management policies and economic instruments should only be considered if they:*
 - a) *directly target problem waste streams or those where there is potential for considerable gains in terms of recycling, or*
 - b) *provide industry with the confidence to invest in new waste management and recycling infrastructure and technology knowing that there will be consistent application of principles and standards.*
- *Funds raised through the introduction of economic instruments on waste should be fully returned through a Trust Fund to waste related activities (excluding State Government operations). Under no circumstances should the funds raised be transferred to Consolidated Revenue.*

The proposed industry waste levy consultation draft provides preliminary information on an industry waste levy. Considerable discussions have been held in local government and the following dot points provide a summary of the concerns raised with the Association:

1. Levy Zones

The levy applies to 34 local government areas. There is concern that some of these areas are not justified in the short term, particularly those areas in south west Queensland. Elected members in the local government areas of Toowoomba, Western Downs, Southern Downs and Goondiwindi met recently and discussed the implications of the levy. Whilst Maranoa is not included in the levy zone, their elected members expressed similar concerns in relation to bleed of waste across the borders from the levy zone. Elected members from Banana and officers from Gympie Regional Councils concurred that the issues raised by the elected members in the south west also relate to their local government area. Issues raised include:

- All of these councils are still coming to terms with local government amalgamations and the rationalisation of landfills and transfer stations that needs to occur to provide better waste management services for communities. The cost of rationalising sites both to councils in dollar terms and the community in service terms is significant and is not something that can be carried out in short time frames. Most councils have identified the sites that will be closed or service levels changed and these changes will occur over the next five year period. Introducing a waste levy changes plans already developed by local governments and requires significant capital investment by councils.

- Potential levy funds to be collected by councils does not justify the expenditure required to collect the levy in these local government areas. It would make more sense to defer introduction of the levy until rationalisation of sites occurs, meaning a reduced number of facilities would require financial assistance to introduce the levy.
- The elected members indicated that the natural geography of their region provides a barrier to industry to haul waste significant distances. The Toowoomba range and Cunningham's Gap are difficult ranges to traverse in heavy vehicles and it is felt that industry would be unlikely to haul waste long distances if they have to travel through these areas.

The Association recommends a deferred commencement date for the levy in the council areas of Western Downs, Southern Downs, Goondiwindi and Toowoomba to allow for rationalisation of sites and appropriate infrastructure to be prepared. It is also suggested that the local government areas of Banana and Gympie be reviewed with respect to commencement date of the levy.

2. Hypothecation of levy funds

Allocation of funds from the levy should be fully hypothecated to waste management and resource recovery until such time as these industries are on their feet and fully functioning. Waste programs in Queensland have not been funded for many years and as such Queensland lags behind other states. Funneling levy dollars off into other programs, local government or not, is not viewed favourably at this time.

The first priority for hypothecation of levy funds should be to develop resource recovery industries both in south east Queensland and regional areas. The purpose of the waste levy is to provide an incentive to the waste industry to divert waste from landfill. This cannot occur if the appropriate industries to support resource recovery are not developed.

There has been concern expressed by local government that the Sustainable Futures Fund may not be dedicated by local government to waste and resource recovery initiatives in the first few years of the levy where these industries are needed. Placing good governance structures around this fund and ensuring that local government allocates funds from the Sustainable Futures Fund to resource recovery activities in the first few years may be a way of satisfying the concerns of elected members who feel that the government is using the levy fund as a way of subsidising government activities.

The environment initiatives fund should only be used once the waste and resource recovery markets are developed and capable of providing effective alternatives to landfill.

3. Commencement date of levy

The commencement date of collection of the levy is viewed as extremely tight. Many councils will require infrastructure and all will require some form of administrative change in order for the levy to be collected. Getting these processes in place will take time. The Association acknowledges, and is grateful for, DERM funding for a position to help councils become levy ready but the reality is that the timeframe is tight. Whilst it may not be possible to delay the commencement date, the Association requests that DERM allow local government some flexibility in the first six to twelve months of the levy program to ensure that

the required systems are in place. The implementation of the levy scheme will have a major impact on most of the identified councils and it will take some time to become accustomed to these significant changes.

It should also be noted that local government budgets for this financial year were approved in early 2010, at which time local government had no knowledge of the waste levy and its implications on council facilities. It is not possible for local government to bring forward any rationalisation or infrastructure funding due to the tight nature of council budgets.

4. Farm waste

The definition of “farm waste” is causing some angst in regional councils where farmers have access to mostly unmanned landfills or transfer stations. It would appear from reading the draft levy proposal that farm waste is commercial waste (as it is not domestic waste) and therefore the levy would apply. However, in regional councils, much of the “farm waste” is deposited in small landfills in small loads and, besides domestic waste, this would be the main type of waste coming into these facilities. As the volumes are small (ute load at a time), is it really sensible to apply a levy? The bulk of these loads are fencing wire (recycled in some areas where metal recycling is viable), drums (that are rusted and not recyclable through programs such as Drummuster) and agricultural plastics (for which recycling markets are currently all but non-existent). Due to the low tonnages involved and the high administrative load involved for councils, the Association suggests that farm waste be excluded from the levy.

5. Liability for debt

Some councils are concerned that if council account holders default on their account payments, then the council will be liable for the levy payment on that waste. This is not acceptable to local government and the Association seeks confirmation from DERM that councils will not be liable for third party levy debts.

6. Tyres

The levy document indicates that tyres “may” be considered lower hazard regulated waste for the purposes of levy application. Tyres are a problem waste for local government and are a constant source of illegal tipping. Adding an additional charge of \$50 a tonne to tyres would further exacerbate the problem for local government and the Association requests that the standard levy be applied to tyres.

7. Establishment funding

The establishment funding noted in the draft proposal is listed at around \$12.5 million to improve compliance and the provision of infrastructure at existing landfills. Toowoomba Regional Council has indicated that it would need approximately \$3 million alone to bring its facilities up to standard to collect the levy. On this basis the overall amount will not be sufficient if one regional council needs this amount alone. This adds weight to the Association’s call for the priority allocation of levy funds to implementation of waste related and scheme development initiatives.

8. Strategic waste management plans

The WARE Fund notes that funds will be available to assist local governments to develop and implement strategic waste management plans. Many councils have already prepared strategic plans under the existing legislation. Will funding be available to councils to change these existing strategic plans to be consistent with the new Queensland strategy?

9. MRF residuals

A consistent concern among local governments is whether the levy should be applied to residuals from Materials Recovery Facilities (MRFs). Residuals from the MRF are technically domestic waste but will be collected as part of the commercial MRF operation. Councils have the ability to change collection contracts to retain ownership of the residuals and thereby not pay the levy. To avoid these problems it is proposed that the residuals be removed from the levy.

10. Weight conversion factors

The weight conversion factors in Attachment B of the levy consultation draft are not consistent with weights that are received by local government in Queensland. The Association requests that these be reviewed in consultation with appropriate industry officers and are changed to reflect Queensland conditions.

11. Illegal tipping

Illegal tipping is seen as a real concern for local government. Whilst it will most likely spike in reaction to introduction of the levy, local government needs appropriate enforcement tools and funding to clean up these sites. Consistent education messages may also help reduce illegal tipping.

12. Closure of sites

Will the infrastructure readiness program fund works at sites that are earmarked for closure in coming years? Several regional councils will rationalise their waste management sites in coming years but will be required to collect the levy at these sites in the meantime. Will these sites still be eligible for funding for items such as height restrictor bars and fencing if they are proposed to be closed?

Comment on Actions

Comments are provided below for each action as listed in the draft strategy. The Association questions how these actions will be funded. DERM need to be clear in how these project and actions will be funded, what they will potentially cost and what impact these will have on the three funding programs as outlined in the levy document.

Action	Description	Comment
1. Toward a resource efficient government	Queensland Government to require departments to prepare and implement strategic waste management plans. These plans will be required to include targets for the purchase of recycled content products, recycling and actions to avoid waste generation and disposal. Departments will also be required to report on the use of recycled-content product, such as recycled aggregate in government works programs.	<p>It is good that the government wants to lead by example in providing strategic waste management plans for each department. This action includes information on purchasing programs but fails to mention waste management for government projects. Wastage in over calculation and general waste in building jobs conducted by state government agencies imposes significant cost burdens on local government, particularly in rural, regional and island councils. The community has a right to expect that taxpayer money is spent effectively and not wasted by over ordering of building materials. The community can also expect that government projects will handle their waste respectfully when in sensitive communities.</p> <p>There is little or no mention in the strategy of sustainable procurement programs. These need to be implemented across government activities (all tiers of government) and encouraged in the private sector.</p>
2. Statewide litter prevention strategy	Queensland Government to prepare and implement a statewide litter prevention strategy that outlines the long term strategic actions to reduce litter and raise awareness of the impacts of litter in Queensland.	<p>Litter and illegal tipping is a huge problem and expense for local government. The Association welcomes a public reporting system similar to that already operating in other states.</p> <p>Funds will need to be provided to local government to assist with enforcement and cleanup of illegal tipping.</p> <p>Abandoned shopping trolleys cause significant problems for local government and legislation needs to include management of trolleys.</p> <p>Junk mail needs to be able to be effectively regulated. Whilst some distribution companies are responsible, there are numerous rogue operators doing the wrong thing and local government needs</p>

		appropriate enforcement tools to deal with these people.
3. Expand 'Do the Right thing, Use the Right bin' public place recycling program	Queensland Government to expand the current public place recycling program to allow Queenslanders access to more recycling bins when they are away from home. This expansion will involve the installation of recycling facilities into additional shopping centres, sporting venues, major events, theme parks, workplaces and schools.	The Association supports this action and welcomes a state wide consistent message both in infrastructure and education program. There is concern though that this type of program requires significant funds and will these funds be available?
4. Strategic waste management planning	Queensland Government will work with, and provide financial assistance for, local governments to prepare and implement strategic waste management plans that are consistent with the goals and targets of the strategy. Regional waste management planning will be encouraged where practical.	The Association supports this plan and supports waste management on a regional basis. A number of points have been raised in the submission above that deal with strategic planning.
5. Improvement and performance payments	Queensland Government will establish a scheme to reward local governments where there is improved performance against specified priorities and performance outcomes. This scheme aims to provide an incentive to local governments to further improve waste management and resource recovery practices. An advisory group will be established to develop the guidelines, priority targets and performance measures for the scheme, as well as to establish the payment formula.	Incentive based schemes to reward performance are supported provided the data that underpins the scheme is accurate.
6. Local government assessment and mitigation program	Queensland Government to establish an assessment and funding program to help local governments assess the environmental risks and infrastructure needs of small to medium sized facilities. In partnership with local government, application and assessment guidelines and program funding criteria will be developed.	The Association supports determining the environmental risks from these facilities provided the funding is provided to then mitigate any risks found.
7. Alternative waste treatment technology	Queensland Government will provide assistance to local governments considering alternative waste technologies by establishing assessment guidelines to aid decision making.	These guidelines will be welcomed to assist local government in this decision making process. Alternative waste technologies are expensive operations and local government needs extensive information to assist in costing these technologies in triple bottom line terms.
8. Orphan and historical waste	Queensland Government to establish a program to assist local governments	Funding for programs such as this has not historically been available and would be

removal	with the cleanup and removal of historic wastes, such as abandoned vehicles in remote areas of the state or for sites with accumulated illegally dumped waste, such as tyres and builders' rubble.	welcomed. The Association is currently working with the Waste Contractors and Recyclers Association and the Torres Strait Island councils to remove car bodies and other waste that has accumulated over many years. Funding such as this would make this project considerably easier and could also contribute to putting processes in place that prevent this type of waste from accumulating again.
9. Enhanced litter and illegal dumping compliance program	The government will work with local governments to identify litter and illegal dumping hot spots and partner with local governments through regional illegal dumping squads.	The Association supports and welcomes this program.
10. Indigenous council area waste removal and litter program	The Government is committed to reducing the incidence of illegal dumping across Queensland and will work in partnership with indigenous councils to address the environmental and social issues of illegal dumping occurring on indigenous council land.	Waste issues in indigenous communities are not restricted to litter and illegal tipping. Whilst this program is welcomed, waste management overall in these communities needs to be reviewed and appropriate assistance provided.
11. Market development for recycled organic products	The Government will work with the organics processing industry to help develop markets and uptake for recycled organic products.	This program will be of significant benefit to local government and is welcomed.
12. Regional resource recovery support programs	The Government will undertake 25 strategic projects in regional Queensland aimed at reducing waste disposal, improving resource recovery and creating 'green' jobs in regional areas. Priority areas will include organics processing, material recovery facilities, establishing strategic regional resource recovery infrastructure, local market development and waste processing for construction waste.	The Association welcomes and supports this project and can work with DERM to identify appropriate programs. However, from which funding program will these be funded? Does this reduce the direct funding to councils if the State carries out these projects?
13. Community recycling champions	The Government will provide funding for five recycling champions. This program aims to foster community leadership to encourage innovative local recycling and management solutions. It also aims to provide community-based education and advocacy on waste avoidance and resource recovery.	This program would be supported if it aligned closely with other educational programs being carried out in local government relating to waste management and resource recovery. From which funding program will these be funded? Does this reduce the direct funding to councils if the State carries out these projects?
14. Collection program for priority products	This action will involve several program areas. The initial phase will involve an infrastructure assessment to identify current and future collection infrastructure needs and	There does not appear to be much information on this project. Local government can work with DERM on this program if needed.

	considerations. The second phase will include an infrastructure rollout.	
15. Household green and organic waste collection	The Government will work with local governments and the organics processing industry to design a series of different green and organic waste collection options (for example, a third kerbside collection bin for green waste only; provisions of a kitchen food waste bin and collection of green and food waste using an existing two-bin system with collection in the alternate week to the recycling bin). These options will be trialed in selected areas across the state.	The Association supports development of the organics industry but also would like to see a number of different trials conducted on a range of options. For example, is home composting more viable than a kerbside third bin (which is expensive in the collection costs and subject to contamination).
16. Household waste avoidance strategy	The Government to work with local governments, industry associations and products manufacturers to raise consumer awareness of the issues associated with wasteful consumption and to provide information about the options available to them.	The Association would like to work with DERM and other bodies to progress this initiative.
17. Target 150	The Government will work with local government, the waste and resource recovery industry and community groups to increase household recycling and decrease household waste disposal to 150 kg per person within 10 years. The current household recycling level is 64 kg per person and the current disposal level is 267 kg per person.	This project will require significant work and funding to achieve this target. There is also not the urgency with waste that applied to water so the community does not necessarily see the need to get behind this program like it did with water.
18. Plastic bag management program	The Government will work with retailers, consumers and community groups to help reduce the use and environmental impact of plastic shopping bags.	The Association would like to work with DERM to implement this project.
19. Community gardens project	The government will work in partnership with local governments, compost manufacturers and environment and community groups, such as Greening Australia and organic farming associations, to establish community garden and permaculture projects. The program could include competitive grants funding for communities to plan and design gardens and purchase equipment and plants, etc. the project will help begin behavioural change in households about the way we view food and reduce the amount of food waste generated.	Local government is likely to be involved in these projects on a localised basis.

20. Online resource exchange register	The government will establish an online database and resource exchange register to link business to a recycled content product directory. An awareness campaign will be undertaken to promote the online database. The resource exchange register will help businesses reduce the amount of waste they dispose of by listing the material online to potentially become an input for another business.	This has been tried and failed in the past so it is unlikely that local government will revisit this with any vigour. The Association will however work with DERM as required.
21. Business waste avoidance and resource recovery program	The government will assist 5000 Queensland businesses to put in place practices and install infrastructure and equipment to help increase recycling and reuse, reducing the amount of waste generated and disposed to landfill.	Local government will most likely be involved in assisting with infrastructure for this project. From which funding program will these be funded? Does this reduce the direct funding to councils if the State carries out these projects?
22. Regulated waste program	The government will establish a regulated waste research and development program with a focus on avoidance, treatment to reduce the hazard characteristics and alternative end uses for this waste.	Whilst this project is not aimed at local government, the Association will assist if required in any way.
23. Resource recovery and awareness	The Government will work with the construction and demolition sector to develop a waste avoidance and resource recovery awareness program. This will help developers, builders, architects and planners minimise waste generation and optimise resource recovery during refurbishment, planning, building and occupation.	This action is seen as essential and the Association and local government would welcome an opportunity to be involved.
24. Working with developers to achieve waste avoidance and recovery	The government will work with developers and peak bodies to raise awareness of the costs associated with resource inefficiencies and wastage and the actions that can be taken to improve waste avoidance and recycling.	This action is seen as essential and the Association and local government would welcome an opportunity to be involved.
25. Timber and wood waste product stewardship	The government will work with peak timber industry organisations to fund sustainable solutions to help improve timber and wood waste recycling, improve community and potential end user awareness and reduce unnecessary wastage and disposal.	Whilst this project is not aimed at local government, the Association will assist if required in any way.
26. Measuring community behaviour and attitudes	The government will undertake biennial community surveys to measure people's attitudes on waste management, recycling, litter and their response to actions taken to improve practices.	This action will provide valuable information to feed into future education programs and would be valuable to local government.