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## Water and Waste Services

29 July 2010

Project Manager - Queensland Waste Strategy Consultation  
**Natural Resources & Environment**  
GPO Box 2454  
Brisbane QLD 4001

### Queensland Waste Strategy 2010 – 2020

Dear Sir/Madam,

Mackay Regional Council (MRC) is committed to sustainable waste management practices and fully supports the state government in its efforts to reshape the future of waste and resource management in Queensland.

MRC understands that an industry waste levy will underpin the new strategy, the purpose of which is to “undertake genuine integrated reform across all aspects – strategic, legislative and economic – of waste management and resource recovery in Queensland”.

Whilst MRC in principle support the introduction of an ‘Industry Waste Levy’, we cannot support the proposed revenue distribution model that allocates a significant proportion of recovered monies to non-waste related projects. MRC believe this fundamental fault will make it difficult for the strategy to achieve its targets.

MRC propose that first and foremost, the government should focus the entire levy funding on building capacity within the waste in industry to deliver the reduction in waste to landfill targets and to develop innovative resource recovery services.

Only when the government can demonstrate that its waste reduction targets have been met should Levy revenue be distributed to other non-waste management projects.

Any non-waste related project allocation of the Levy funds is an indication that the Levy is simply a new state government *general* tax.

MRC also provides some observations and seeks clarification on a number of points outlined below.

## **Waste Avoidance and Recycling Draft**

### **Optimistic Targets (Pg 9)**

- Figures 1 & 2 are simplistic at best. Any changes to the waste markets will not happen overnight and improvements to recycling recovery rates and reduction in waste to landfill will not occur immediately. The targets in the graphs for the first two years appear optimistic.

### **Strengthening legislation (Pg 25)**

- Contamination of various waste streams is of great concern to facility operators.  
For example placement of non-recyclable items in yellow lidded recycling bins or hazardous waste being deposited amongst general waste.

Contamination can cause;

- product & financial losses,
- plant & equipment damage; and
- environmental & workplace health and safety hazards.

There is little ability under the current legislative framework to effectively deal with contamination and this should be addressed by the new legislation.

If legislated, Penalty Infringement Notices (PINs) could be used by Council's to enforce proper use of yellow lidded recycling bins etc.

### **Waste Stream (Pg 26)**

- Waste stream source data can potentially be distorted by deceitful commercial, industrial, construction and demolition operators who will attempt to claim some waste to be domestic.

This is currently a significant issue for local governments that subsidise domestic disposal fees. The appliance of a levy to commercial waste only is likely to exacerbate this behaviour.

Local governments will likely experience escalating interface issues at point of disposal. The State will also be penalised by lost levy funds and target failures.

### **Mixed loads MSW & levy waste (Pg 26)**

- There are complexities in relation to administration and regulation of mixed loads of MSW and levy wastes. Operational determinations are required.

#### **Levy amount differentiated by waste type (Pg 26)**

- The differential levy for waste types will provide incentive for hazardous wastes to be diluted with other waste streams to avoid high disposal costs. This in turn may cause significant environmental and workplace health and safety issues for facility operators.

#### **Recycling Targets (Pg 32)**

- There seems to be no breakdown of what actions will achieve the various targets. This is particularly evident with the Municipal Solid Waste (MSW) as the draft claims that recycling will increase from 23% to 50% by 2014.

The MSW actions in the strategy rely on successful resource recovery. However, levy money for this area only represents 41.6% of the allocated funds.

No levy applies to MSW and therefore this sector will have no drivers for change and in fact will distort the market as commercial operators will make claims that their waste will be domestic.

#### **Action 4 – Strategic Waste Management Planning (Pg 35)**

- Will assistance be provided to proactive local governments that have already introduced a regional waste strategy plan?

Will funds be provided to regional councils to amend their regional waste strategies to make allowances for the new state waste strategy?

#### **Action 5 – Improvement and performance payments (Pg 35)**

- Will pro-active local governments that have already made significant investments into their waste management systems be disadvantaged against local governments that up till now have done little or nothing at all towards investing in waste management?
- Will retrospective funding be available for pro-active Council's that have invested in resource recovery facilities and are carrying high debt?

#### **Action 9 – Enhanced litter and illegal dumping compliance program (Pg 35)**

- Commendable action, however is this realistic for the entire state?

Illegal disposal is a problem throughout the state. Having hit squads is a good idea, however the action says "in conjunction with local governments".

This is assuming that local government have existing resources in enforcement. What will the State do when this is not the case?

- Also, will the State provide assurance that illegal dumping squads will not be used for other compliance matters for DERM?

### **Action 12 – Regional resource recovery support programs (Pg 36)**

- This action is listed under Industry development. Will local government waste businesses be eligible for these projects?

### **Action 17 – Target 150 (Pg 38)**

- The aims are admirable, however the strategy does not quantify how much waste will be either recovered or diverted from landfill from the individual actions.

How then, will any review identify which actions were successful, which actions failed, or which actions did not meet their intended target?

Without any quantifiable information the strategy numbers appear to be guesstimates.

## **Proposed Industry Waste Levy Consultation Draft**

### **Distribution of the levy revenue (Pg 6)**

- It is disappointing that the levy is being split into three areas. The WARE fund has the only direct correlation to the waste industry and ability to achieve the goals stated in the strategy. It would appear more practical if over an initial 5 – 10 year term that 100% of revenue is used in the WARE fund.

This would enable real change in the waste markets. Under the current proposal it is likely that there will be insufficient funding on a state wide basis to achieve real change and the targets set in the strategy will not be achieved.

### **Waste streams the levy applies to (Pg 2)**

- There are differences between existing state levies as to what materials are subject to the levy. For example in NSW all materials disposed to landfill, including daily cover material imported to the site is subject to the levy, while in SA clean fill, subject to size restrictions is exempt. This needs to be clarified.

### **Levy Collection (Pg 4)**

- Facility operators are expected to manage the collection and remittance of levy monies to DERM. There is a significant cost to the operator for this service. How is this cost recuperated or is it expected to be absorbed?

### **Levy exemptions (Pg 4)**

- The draft proposes that a levy exemption certificate may be issued to any particular organisation. Applications for exemption certificates are to be made in advance of disposal.

Most local governments that apply a gate fee already have exemptions and issue certificates for charities. Local governments have data on the operator's current disposal patterns. Any levy exemptions should align with the gate exemptions. Some charities are low users whereas others are daily. If the State wishes to reduce the amount of exemption, they should consult with the impacted organisations. Failure to do so may see pressure being applied to elected representatives to introduce a permanent exemption.

- At local briefings DERM officers have advised that residual wastes from Material Recovery Facility (MRF) and Resource Recovery Facility (RRF) operations will be considered Commercial wastes and therefore will not be exempt from the Levy.

MRC does not charge for the receipt of goods at its resource recovery centres. However, it appears the State intend to apply the Levy for all residual wastes from RRF's and MRF's.

This decision will increase amount of waste to landfill, as Councils' will be more selective of the material accepted at RRFs and MRFs

This may prove counterproductive to the strategy. MRC propose that MRF and RRF residual wastes be exempt from the Levy.

#### **Establishment funding (Pg 5)**

- The Draft states that \$12.5 million will be available for improved compliance and the provision of infrastructure at existing landfills. This is commendable, however, MRC believe the ability to have improvements implemented state-wide by 1 July 2011 is doubtful.

#### **Proposed vehicle weight conversion factors (Attachment B)**

- The proposed conversion factors are not specific enough to cover the variety of waste and vehicle types encountered and will cause interface issues at point of disposal.

This requires a more rigorous assessment to provide a higher level of confidence in the waste levy deeming at non weighbridge sites.

Yours sincerely,



**John Hogg**  
Manager Waste Services  
Mackay Waste Services