



30 July 2010

Project Manager
Queensland Waste Strategy Consultation
Natural Resources and Environment
Department of the Environment and Resource Management
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By Email: waste.paper@derm.qld.gov.au

Dear Sir/Madam

Thank you for the opportunity to comment on the Queensland Government's *Waste Avoidance and Recycling Consultation Draft* ('Consultation Draft').

Master Builders is the peak body for housing and construction in Queensland and represents the interests of over 9,000 building-related businesses across the State. Given that the proposed Queensland Waste Strategy 2010-2020 will focus in part on construction and demolition waste, Master Builders has a strong interest in many of the issues discussed in the Consultation Draft.

General Comments

The Queensland building and construction industry is aware that it has a social responsibility to minimise the impact that its activities have on the environment and that it needs to work co-operatively with government and the wider community to find feasible solutions to these issues. To this end, an increasing number of building industry participants are seeking to reduce their waste streams and improve the environmental performance of the products and/or services that they supply.

Master Builders has been provided with anecdotal evidence that in South-East Queensland many large commercial builders are already achieving high levels of recycling and reuse of construction and demolition waste (upwards of 75 percent).

While the rates achieved by the housing sector in South East Queensland are lower, Master Builders understands that some businesses are achieving rates of around 35 to 40 percent. Our expectation is that these rates will improve (at least in South-East Queensland) as consumers gradually begin to follow the lead of major commercial customers in demanding improved environmental performance during the construction of new (or renovation of older) buildings.

The current cost of waste disposal/recycling is in the order of \$1,500 to \$1,800 for single storey dwellings (to an average builder) - with a 50% increase for double storey. Our estimate is that the proposed levy will increase the cost by approximately \$400 for each house (based on approximately 20 cubic metres or 11 tonnes of mixed builders waste).

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There are a number of challenges that will need to be addressed in order to improve recycling/reuse rates in the commercial and housing construction sectors; and reduce the construction and demolition waste stream. Space limitations and regulatory requirements (workplace health and safety, local government and so forth) make it difficult for builders to sort and/or recycle materials on site in many instances. This is a particularly important issue for houses which are being constructed within established suburbs (i.e. brownfields developments) as it is less likely that builders will be able to place recycling bins on the nature strip or road.

The ongoing shift towards smaller blocks will also make it increasingly more difficult for many builders in the housing sector to sort/recycle waste onsite in the future. It is therefore likely that much of the waste stream generated by the housing sector will continue to be sorted and recycled at transfer stations and waste facilities rather than on-site. It is imperative for the success of the strategy that builders and waste collection companies serving the construction industry have adequate access to these facilities throughout Queensland.

Master Builders notes however that it will simply not be economically viable, at least in the short to medium term, for these facilities to be provided within in a reasonable distance of every new house construction project in the State. The unfortunate reality is that some locations will simply not have the economies of scale and demand for recycled product required to justify the investment in this infrastructure. In addition, the financial and environmental costs of transporting waste to other locations for reprocessing may potentially outweigh the benefits in some instances. This is particularly so in regional areas. It is important that the Department is mindful of these challenges in setting waste reduction and recycling targets for the Queensland construction industry. In our view, there must be some flexibility to adapt strategies and initiatives to local circumstances as the size and diversity of the State's regions means that a 'one size fits all' approach is unlikely to be appropriate.

In order for the Waste Strategy to achieve its aims, it will also be necessary to develop cost effective recycling technologies and uses for recycled/processed waste products. Master Builders notes that many building products are regulated (for example, by Australian Standards) due to the potentially safety implications in the event of product failure. It will be important for government and industry work together to address any concerns about certain recycled products and to ensure that these products meet the relevant standards. It is also important that the Department is mindful of the design and performance requirements imposed on many building products by Australian Standards when setting recycling/reuse targets and the potential barriers that these requirements may pose to the recycling/reuse of certain materials.

Master Builders' comments on the specific questions raised in the Consultation Draft are as follows.

Do you think the waste avoidance targets are an appropriate measure for waste avoidance?

Master Builders does not believe that the waste avoidance targets (in particular the first overarching target) are an appropriate measure. The first target refers to reversing the overall trend for an annual increase in waste generation. Given that Queensland's population is forecast to grow quite substantially between 2010 and 2020, it is simply not appropriate to use targets which refer to the overall increase in waste generation without making allowances for population growth (as population growth will generally lead to higher levels of waste generation). The overarching targets should be framed in terms of per capita levels and trends rather than overall levels and trends. A failure to do this will lead to targets which are simply unrealistic and unachievable and this will undermine the credibility of the strategy.

Can you suggest other targets or measures for waste avoidance?

As noted above, Master Builders believes that any targets must be based on a per capita basis.

Do you think that the recycling targets are appropriate?

Master Builders has concerns about the proposed recycling targets, particularly if they are to be applied at an operational or site level. As discussed earlier, the larger commercial builders in South East Queensland may well be able to meet, if not exceed, the targets. However, builders in the housing sector and in regional areas will undoubtedly struggle to achieve the targets due to a range of factors including site constraints, cost and a lack of recycling infrastructure.

Furthermore, without access to the information that the Department relied upon in setting the targets, Master Builders is not in a position to form a firm view on the appropriateness of specific targets. We would however note that it is important that any targets for construction industry waste are realistic and set after due consideration has been given to specific challenges identified above.

Do you think there should be targets for other specific streams?

No. Master Builders considers that the strategy should focus on the key waste streams rather than trying to cover everything. Adding targets for other streams will divert resources and attention away from the core waste streams and increase the risk that the Department will spread its resources too thinly to achieve meaning outcomes.

Do you think that we should have a reduction target for litter and illegal dumping?

At this stage, we do not believe that the Waste Strategy needs to include targets for either of these matters. In our view, the Government should always be seeking to minimise illegal dumping and should therefore introduce appropriate regulatory measures which are aimed at achieving that outcome. It is important that these measures are in place prior to the introduction of the proposed waste levy as it is likely that the incidence of illegal dumping may increase as some irresponsible individuals and businesses seek to avoid paying additional costs.

Should we have a landfill diversion target?

Master Builders considers that the varying characteristics of Queensland's regions make it difficult to set meaningful State-wide landfill diversion targets. In addition, the setting of recycling and reuse targets will effectively lead to landfill diversion so it is questionable as to whether both targets are necessary.

Other issues – education & awareness

Finally, Master Builders believes that education and where appropriate, assistance, must be important components of the Waste Strategy. Like the rest of the State's business community, the construction industry is diverse in its composition. The resources and knowledge base of businesses in the industry varies widely, with large builders (particularly those in the commercial building sector) likely to be better placed to address environmental issues. Unfortunately, the limited financial and time resources of many smaller businesses, particularly in the housing sector, means it is considerably more difficult for these businesses to investigate and implement improved waste strategies.



It is important that the Department develops an education and awareness campaign to assist these businesses to reduce their waste stream. We note that action 23 in the draft Strategy addresses this issue.

I trust that this information is of assistance in your consideration of this matter.

Yours sincerely

Paul Bidwell

Paul Bidwell
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