



Queensland
Conservation

Project Manager
Queensland Waste Strategy Consultation
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Submission on Draft Queensland Waste Strategy 2010-2020

Thank you for the opportunity of submitting our comments on the above waste strategy.

Queensland Conservation (QCC) is the peak environment organisation of Queensland, representing all the major community-based environment organisations in this State.

Introduction

In our submission of the waste strategy discussion paper (*Let's Not Waste our Future Discussion Paper*) QCC made the following broad comments:

Currently, Queensland is a wasteful society. Most products and resources are used once and then discarded in landfill as mixed wastes. A waste reduction strategy must recognise that improved outcomes can only be achieved by abandoning current wasteful practices and behaviour. Queensland must adopt a closed loop system to managing its waste. This is best described as a *cradle to cradle* approach.

That a waste strategy should focus upon the avoidance of waste in the first place, and then focus on the management of any wastes as re-usable resources. We support the application of the waste hierarchy (with avoidance at the top of the hierarchy) to guide this approach.

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That the goal of a waste strategy must be to achieve a zero waste outcome with interim milestones targets set

That a waste strategy introduce an accurate and comprehensive accounting system for waste and recycling levels

That a *whole of system* strategic approach, with full lifecycle resource assessments, as the pathway towards achieving goals.

That a waste strategy provides sufficient funding to support waste reduction and resource recovery, ideally through the establishment of a waste levy.

That a waste strategy links resource recovery, collection services and opportunities, with programs to inform a knowledgeable community.

Response to Draft Strategy

QCC is encouraged by many of the proposed initiatives in the draft strategy. We support the introduction of a levy and urge that this is regularly reviewed so that it can be tailored as a principle driver for waste reduction and resource recovery.

Waste Levy

Our view is that the levy should be applied across all three waste streams, but understands the political circumstances that have caused the exclusion of residential wastes. We remain unsure as to how the strategy will deal with collection services that access both residential and commercial clients.

In our view a levy applied across all three waste streams, with the funding from the residential sector hypothecated back to local government for resource recovery, would still be a simpler and more effective system.

Waste Reduction Targets

QCC supports a zero waste aspiration and believe it represents a realistic goal for the future. It also acts to set a strategic pathway. However, we acknowledge the fact that the strategy has set some clear waste reduction targets.

The question that remains is what will the next target be, once these have been achieved? Having a zero waste target, with milestones represents a far more elegant strategic pathway for a waste strategy.

The targets outlined whilst welcomed, are remarkably unambitious. Whilst we recognise that Queensland is starting from a poor position, we believe that targets should at least reflect and be comparable with targets in NSW.

QCC suggests that the Queensland recovery targets proposed in the draft strategy all be fast-tracked to 2015 (rather than 2020)

Data Collection and Distribution

If it can't be measured, it can't be managed. It is therefore critical that good and accurate data systems are developed to assess and measure performance. There is no doubt that the introduction of a levy and the need to impose this will assist towards more accurate data collection.

QCC does not have any particular preference for how this might be achieved but supports the engagement with other agencies and the waste and recycling industry in assist this.

Considering models and systems from other states should be a first port of call.

We support the establishment of a Stakeholder Advisory Committee.

Extended Producer Responsibility

QCC supports Extended Producer responsibility (EPR). It reflects the principles of ESD, to which the Queensland Government is signatory.

QCC supports EPR because it promotes the integration of lifecycle environmental costs and establishes a closed loop system of product use, recovery and re-use.

QCC believes that there are a number of problematic materials to which EPR could and should be applied these include:

- Electronic waste
- Tyres
- Used oil
- Gas cylinders
- Lead acid batteries/ nickel cadmium batteries
- Household hazardous materials (paints, cleaners, pesticides etc)

We believe that action on these wastes should be a matter of priority.

We see Container deposit legislation as a component of an EPR agenda and support its introduction. The Queensland Government has maintained a semblance of support on CDL, particularly if introduced as a national scheme. We are encouraged by the agreement of the Commonwealth and States to a Regulatory Impact Statement on a national scheme.

Strategic Implementation

The draft strategy contains a range of proposals and initiatives that may, on the face of it, be useful and contribute to the goals and objectives of the strategy. The draft also references the application of the waste hierarchy as a frame for decisions.

However, we believe that the draft strategy fails to outline a clear pathway to its goals and objectives.

What it lacks is a strategic decision-making model that can frame and identify the most effective strategies and ways forward.

The Western Sydney Waste Board in its Regional Waste Plan (1998) devised a very useful decision-making tool that could be utilised. This tool is based upon a simple life cycle assessment model.

The model identifies the roles, responsibilities and functions of each sector as a product passes through the economy. Using the model, decision makers can identify what changes in activities that sector must achieve to meet desired objectives.

A product passing through the economy starts as a virgin resource, becomes a manufactured good, is distributed and sold to a consumer. Once it has reached its useful product life it is discarded, either to landfill or resource recovery.

The challenge for a decision maker is to ensure that the product does not become a single use item but is recycled in the economy for as long as possible.

QCC would urge that this model should be considered in the waste strategy as a useful and effective decision making tool to identify the most effective strategies to reduce waste and maximise resource recovery. It will allow clear and strategic priority decisions to be made.

An attachment (extracted from the Regional Waste Plan of the western Sydney Waste Board is attached)



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