

QUEENSLAND PORTS ASSOCIATION

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(by email - waste.paper@derm.qld.gov.au)

Project Manager – Queensland’s Waste Strategy consultation
Natural Resources and Environment
Department of Environment and Resource Management
GPO Box 2454
BRISBANE QLD 4001

Dear Sir

I refer to the documents “*Waste Avoidance and Recycling Consultation Draft*”, and the “*Proposed Industry Waste Levy Consultation Draft*” that are currently displayed on the Department of Environment and Resource Management (DERM) website for public comment. I also refer to a strategy briefing session and workshop provided in Gladstone by the DERM on 13 July 2010 which was attended by QPA representatives.

It is understood that DERM are undertaking a substantial waste reform program, with the intention of developing a new Queensland waste strategy, new legislation and an industrial waste levy. It is also understood that preparation and consultation on the proposed legislation is scheduled to commence around the third and fourth quarters of 2010. The following submission is made by the QPA to provide input to the draft Qld Waste Strategy Consultation Paper.

Specific Comments

Proposed Industry Waste Levy Consultation Draft – pg. 4 – Levy Exemptions

The strategy currently provides broad definitions pertaining to levy exemptions. The QPA recommends that the consultation draft document should include further definition of proposed waste exemptions regarding dredge spoil reuse.

Sea disposal of dredge spoil is an option exercised by ports when other beneficial reuse strategies are not available. Sea disposal is conducted through a commonwealth permit process under the *Environmental Protection (Sea Dumping) Act 1981*. Disposal to sea is governed by the careful application of waste prevention audits and a waste management assessment process. The QPA recommends that, whilst this is potentially outside the jurisdiction of the current strategy, consideration and definition is provided in the draft document under the exemptions heading.

All beneficial reuse of spoil material, such as reclamation, beach nourishment, offshore berms and fill activities should be defined as exempt as the material is not, by definition, a waste product. The use of clean fill for landfill capping should also be defined under the list of exempt waste materials.

Proposed Industry Waste Levy Consultation Draft – pg. 2 – Levy amount

The strategy provides a disposal levy amount for contaminated and acid sulphate soils. QPA recommends that the strategy considers mechanisms for scaling levies applicable to the disposal of contaminated and acid sulphate soils, with reference to the degree of contamination.

Thank you for the opportunity to provide comments on the draft Qld Waste Strategy Consultation Paper. The QPA looks forward to further consultation as the strategy and associated legislation is further developed.

Yours sincerely



Rick Morton
Chairman – Planning and Environment Committee
Queensland Ports Association