

The Project Manager
Queensland Waste Strategy Consultation
National Resources and Environment
Department of Environment and Resource Management
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Brisbane QLD 4001
Email: waste.paper@derm.qld.gov.au

12 July 2010

Dear Sir/Madam

Submission: Queensland's Waste Strategy 2010 – 2020

The Queensland Tourism Industry Council (QTIC) welcomes the opportunity to provide input into the Department of Environment and Resource Management's 'Queensland Waste Strategy 2010 – 2020' and, in particular, the 'Proposed Industry Waste Levy Consultation Draft'.

The information provided in this submission reflects the views of Queensland's highly diverse tourism sector bodies and regional tourism organisations and can be considered as a united industry response to this issue.

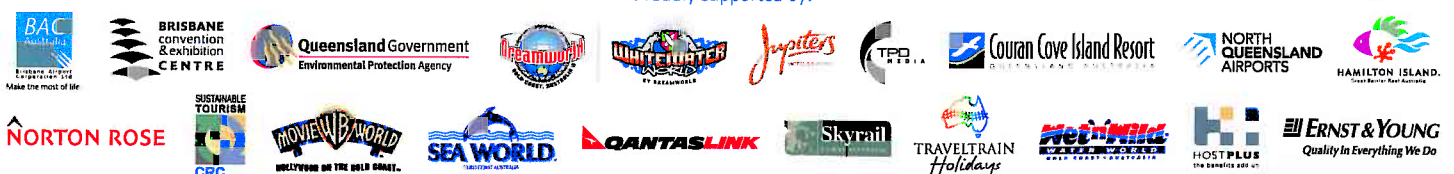
The Queensland Tourism Industry Council

The Queensland Tourism Industry Council (QTIC) is a private sector, membership-based tourism industry organisation. QTIC represents the interests of the tourism industry, including business operators, Regional Tourism Organisations (RTOs) and sector associations.

All of Queensland's RTOs are members of QTIC, as are 17 of the industry's sector associations and in excess of 3,000 regional members, operating in all sectors of the tourism industry.

QTIC is owned and governed by its members through member based councils, boards and committees and truly reflects the views of the industry at all levels throughout Queensland.

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Feedback

While QTIC appreciates the importance of protecting Queensland's unique natural environment, it, nonetheless, has concerns over the implications of government's proposed 'Industry Waste Levy' on the tourism and hospitality industry in Queensland.

As outlined in its recent correspondence to the Premier (17 June), QTIC recognises the need for strategies to drive improved waste generation and disposal practices, but proposes that this new environmental charge will be implemented at a time when the resilience of the tourism industry in Queensland continues to be tested.

Given the increased competition for market share and the current economic pressures placed on tourism businesses in Queensland, operators will be unable to pass any cost increases imposed by the introduction of the 'Industry Waste Levy' onto consumers. With this in mind, the new levy has potential to further erode the economic viability of tourism businesses and ultimately have negative flow-on effects for the economy and the capacity of the industry to employ and retain staff.

In addition to these points, QTIC wishes to make the following further feedback:

- Consumer demand is already ensuring the development and continuation of responsible environmental practices in the tourism industry. These practices will be further enhanced by the, soon to be introduced, 'National Tourism Accreditation Framework', which will ensure that the industry exceeds government's environmental targets - without the need for further environmental levies and taxes.
- QTIC fears that, should this waste levy be introduced, government will be implementing a waste management policy direction which unduly shifts the bulk of the burden and cost of waste management onto already-struggling Queensland businesses.

This will be particularly the case given that, should this policy be introduced, Queensland will be the only state in Australia where a waste levy is applied only to businesses and not households.

- The Queensland Government's own research suggests that households generate almost as much waste as the general business community and, while household waste has grown by 40 per cent over the past five years, the level of commercial and industrial waste has decreased.

Queensland businesses also continue to outperform households in recovering waste for recycling and reuse. In 2007-08 the rate of waste recovery for commercial and industrial waste was 55 per cent. This compares to a much lower rate of 21 per cent for Queensland households.

- Not only will the introduction of this levy directly impact on tourism businesses, it will also impact directly on low cost housing. In environments such as manufactured home parks

and mixed parks - where long-term tenants reside under short and long term agreements - operators will be left with no other option but to pursue increases to cover costs and to stay in business. Taking this into account, the 'Industry Waste Levy' will also have a flow on effect to some residents.

- Should an 'Industry Waste Levy' be introduced, QTIC proposes that revenue raised should directly subsidise the cost of engaging in recycling processes - the current cost of which is excessive considering the current bottom lines of most small and medium sized businesses.

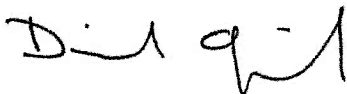
QTIC also proposes that, if implemented, the waste levy should be modelled on declining use rates where businesses that generate less waste are charged a lesser amount. This would provide incentives for businesses to improve waste management that the current proposed 'flat rate' would not achieve.

Finally, QTIC contends that waste resulting from extraneous catastrophes - including cyclones, floods, oil spills and bush fires - be exempt from any form of environmental waste levy implemented.

QTIC has welcomed the opportunity to provide feedback on the Department of Environment and Resource Management's 'Queensland Waste Strategy 2010 - 2020 - Proposed Industry Waste Levy Consultation Draft'. As discussed, while there is clearly a need to develop improved waste generation and disposal practices in Queensland, QTIC proposes the need for a waste strategy that offers protection to Queensland's unique natural environment while also ensuring positive economic and employment outcomes for Queenslanders.

Please feel free to contact me on (07) 3236 1445 should you wish to discuss any aspect of this submission further.

Kind regards



Daniel Gschwind
Chief Executive