

6 August 2010

Your Ref:

Our Ref:

File No:

Contact: Paula Kemplay T: 3829 8597

Project Manager
Queensland Waste Strategy Consultation
Natural Resources and Environment
Department of Environment and Resource Management
GPO Box 2454
BRISBANE QLD 4001

Dear Sir/Madam

REDLAND CITY COUNCIL RESPONSE TO DRAFT QUEENSLAND WASTE STRATEGY 2010-2020

Thank you for the opportunity to be consulted on the draft Queensland State Strategy. Redland City Council (Council) welcomes the major waste and resource efficiency reforms proposed in this document over the next ten years. Council also would like to emphasise the need for ongoing engagement and discussion with DERM as the details and iterations regarding the strategy and levy implementation unfold. A Queensland wide strategy needs to be flexible to cater for particular local government needs.

The specific comments that Council submits are as follows:

1. Council endorses the 10 year recycling targets and requests that the data capture and quality be addressed as a priority and the targets be reviewed pending the data capture review. There is no direct comparison between the actions documented and the percentage performance gains towards resource recovery. Council will need to double it's own resource recovery performance to meet the 2020 targets and wants to ensure community expectations are realistic. Council requests that DERM consider quantifying resource recovery measurements from the major actions to assist in prioritising funding to local government. It is considered that setting landfill diversion targets will complement the push to greater resource recovery as has occurred in Europe.
2. DERM has asked whether there should be a reduction target for litter and illegal dumping. This target could be based around establishing the number of illegal tipping cases with reduction targets on the baseline. Council requests that DERM undertake more assessment into a suitable data capture system to understand the nature of the items disposed and measurement of illegal tipping events and other suitable deterrent and compliance initiatives. This is a topic that requires further partnership between local government and DERM. Council notes the establishment funding by DERM to assist in managing the predicted increase in illegal tipping activities as a result of the introduction of the levy and welcomes further discussion on how to effectively utilise that in the Redland City area.
3. It is unclear how regional collaboration achievements to improve infrastructure and capacity building will be financially recognised via the strategy implementation funding provisions. DERM are requested to advise what

weighting will be applied to regional collaboration initiatives and identify this as a priority guideline for Councils as part of the Strategy action plan.

4. Council requests further clarification of levy exemptions for waste to be disposed of by regulation eg fire ant material, residue from Material Recovery facilities and also consideration of non-profit organisations for levy exemptions where they operate similar to charities in reusing and repairing waste items.
5. A question has been raised about whether C&I businesses who are recycling as part of Councils systems should be exempt from the levy as the logic that applies to MSW is the same. DERM is requested to further analyse this aspect.
6. There are approximately 100 businesses across the 6 islands that have a kerbside Council waste and recycling system and are not permitted to use Councils transfer stations. It is requested that DERM undertake a more detailed assessment of the cost-benefits and levy impacts on these islands as they are not currently serviced by other private operators (apart from bulk services on North Stradbroke Island) and consequently the businesses have no choice but to have a Council provided service.
7. If the levy has to be applied to commercial businesses and industry on Councils kerbside collection systems, DERM needs to be made aware that Council does not separate the waste and recycling charge codes between C&I and MSW and will need to adjust it's codes and systems to be able to comply with the levy. DERM are further advised that the property codes can be complex in a rating system and for example religious organisations are coded separately and yet are not covered by any of the existing definitions in the draft strategy. A formula for the rating system charges which can only be set once per year is requested. It is understood that DERM are funding an additional resource via the Local Government Association of Queensland and it would be recommended that this officer co-ordinate information from audits to arrive at default conversions on a regional level for quantifying the impact of the levy on different wheelie bin and bulk bin containers. The proposal by DERM that all Queensland Councils do the calculations themselves is not supported.
8. Council reinforces the fact that Councils budget for 10/11 was set well before the draft Strategy released and therefore no funds have been allocated for levy implementation. The establishment will have to be fully funded by DERM. Timely provision of funding is required to assist Councils to prepare and set up for the levy. This funding must be available at least 6 months prior to the implementation date.
9. If a sundry debt for a commercial customer for the Industry Waste Levy is unable to be collected (e.g. bankruptcy) then it is the council who may wear the debt. This needs to be clarified with DERM and mechanisms enabled to write off the levy portion of the debt by DERM.
10. RCC calls on the State Government to ensure that all funds raised from the waste levy are fully hypothecated to waste avoidance, resource efficiency measures and site remediation measures rather than new conservation areas and any general environmental initiatives.
11. There is still uncertainty regarding how the levy will be distributed across the programs and grant systems. An operational guide, outlining set up and implementation of the levy, would assist in ensuring equitable application

across all jurisdictions including full consultation with local government on this detail.

12. The proposed implementation date for the waste levy may be difficult to meet. A phase in approach for implementation of the levy is requested where concerns are raised with DERM individually. Assessment of individual Councils situations is necessary. In RCC this is critical especially for the six islands which should be treated as a special case given their more remote location. There are increased costs to deter illegal tipping and monitor compliance activity compared to the mainland.
13. Given ongoing engagement and consultation with Council and local government is required, Council requests that DERM allow adequate consultation time of at least 10 weeks to allow Councils to properly consider the issues and document any responses through the Committee cycle process which often has a two month lead in to a decision.
14. Will the exemption for water/wastewater also apply to Allconnex Water?

Should you have any clarifications on this letter please contact Paula Kemplay Senior Advisor Waste planning on (07) 3829 8597.

Yours sincerely



Gary Photinos
Acting General Manager Planning and Policy