

**Rockhampton Regional Council
Submission to
Queensland's Waste Strategy 2010-2020**

Rockhampton Regional Council is in the process of identifying a suitable future landfill site and is only too aware of the issues facing waste management operators in the current social and environmental climate. It is acknowledged that waste management from education to collection and through to disposal is a costly and resource reliant activity and one that is not sustainable at current and projected levels. Council would like to commend the State on initiating this Waste Strategy that seeks to minimise waste to landfill and would present the following comments and concerns in respect of the issues raised in the Strategy.

Need for detail surrounding the strategy

The implementation date of 1 July 2011 now being less than 12 months away is ambitious with the implementation of certain aspects of the Strategy, including the administration of the disposal levy, impacting heavily on waste management facility operators including this Council.

This will see a significant amount of work and investment in implementing the Strategy needing to occur during the current financial year. Council will need clarity to determine the resources and investment necessary to implement the various aspects of the Strategy.

Council requests that a timeline including milestones be produced and made available to waste facility operators. That timeline should detail the Department of Environment & Resource Management's (DERM) information and documentation milestones to enable the Council to undertake effective planning for implementation. The timeline should, at a minimum, identify dates when the following will occur:

- final strategy released;and
- legislation review and development including consultation time frames.

It should also provide greater detail on a number of matters including:

- pre and post-implementation community consultation and education plan;
- definitions such as waste types, premise type, specified weight determination, i.e. how was the 2.4t/capita figure obtained, established and made available;
- the likely recommended processes to be utilised when handling anomalies that will or likely to occur through the customer transaction component of the process – i.e. mixed loads, loads not fully visible. Please provide examples in all cases;
- the initial and ongoing assistance packages including the quantum, when funding will be available and the process for accessing funds;
- grant funding availability, eligibility and processes;
- future reporting requirements including information such as regularity, content and format;
- training schedule for Council and facility staff including waste managers, finance officers, facility gatehouse staff, customer service officers and local laws officers;

- requirements for waste management facilities and Council's in general such as weighing facilities, IT systems and staff; and
- changed responsibilities of regulation activities e.g. litter management programs.

Council requests that the information flow be continuous and that Council be provided the opportunity to offer feedback and have input throughout the process both in development and implementation.

Whilst Council supports the general approach of the Strategy, it is considered that there remains significant ambiguity in many aspects of the Strategy. Speedy development of a comprehensive listing of definitions and clarity around data requirements and processes will be essential to engender support from operators.

Administration of the Levy and Reporting Responsibilities

The administration of the levy collection and reporting requirements present added financial burden to the Council in both the adaptation of current systems and as an operational cost in to the future. Council would strongly request that consideration be given to providing a fee per levy collected/charged to cover the costs of administering the levy and the associated mandatory reporting. This fee obviously would be funded from the levy collected but should not impact that significantly on funding available for the grant programs suggested..

There is a disparity in data collection and reporting systems across the State and it is requested that consideration be given to establishing a unified data collection system, so as far as possible, existing data management systems remain relevant; however, the provision of good solid definitions for the required data may negate the need for wholesale changes of systems.

Regional Challenges

Whilst the targets contained within the Strategy are aspirational and Council accepts that as average State-wide targets those could be seen as being reasonable; however,. Council would have concerns should targets be mandated and applied unilaterally across the State.

Challenge 6 acknowledges that the majority of resource recovery facilities are located in South East Queensland. Consequently, it is pertinent that it be acknowledged by the State that areas that have access to affordable resource recovery facilities, such as South East Queensland, and those best positioned to attract new facilities are likely to have greater success in achieving the targets than remote and regional areas. It is suggested that this would be the case, particularly within the first three years during which time the greatest change is proposed.

Costs associated with transportation and market fluctuations continue to make resource recovery and recycling activities challenging for regional and remote facilities. There may be merit in establishing differential targets for regional and remote areas, based on probability and potential to attract resource recovery and reuse facilities until the "local markets" promoted in the Strategy are established. Such a change in the Strategy would be welcomed, particularly if supported by the improvement and performance payments proposed in Action 5.

It is pertinent to note that the targets established in the draft Strategy will only be achievable if green wastes and organics (including contaminated cardboard) are extracted from the general waste stream. The most effective way to extract any waste from the stream is separation at the source. This can be undertaken relatively easily with green wastes and organics; however, the establishment of local markets for green wastes and organics is imperative to the financial viability of implementing reuse strategies.

As this Region continues to face greater challenges in resource recovery, Council encourages any opportunity for infrastructure and initiatives within the Region to be supported by a merit based grant funding allocation. Significant research has occurred in regional areas and historically this Council has worked collaboratively with other Central Queensland Councils, the Central Queensland University and a range of other organisations to explore effective contemporary waste management strategies. Remoteness from markets and access to appropriate infrastructure and funding has in many cases limited progression of those strategies.

Council supports Action 12 – Regional resource recovery support programs are encouraged and Council recommends that this be identified as a priority Action.

While Council acknowledges that the financial impact of the levy is designed to drive change in waste disposal; however, it is concerned that the levy will, particularly in the shorter term until reuse and recycling options are available disadvantage regional businesses, including Council.

Additional costs to Rockhampton Regional Council as a result of the implementation of the levy are estimated to be between \$400K and \$500K based on the 2009/10 waste to landfill figures. Council requests that DERM consider assisting regional councils and businesses in developing waste minimisation strategies with interim solutions until local markets develop or alternatively consider a phased in approach in regional Queensland.

Throughout regional Queensland unmanned transfer and refuse stations form part of municipal waste management infrastructure. These stations are likely to provide a levy avoidance alternative for many businesses with a subsequent increase in costs to the council as it is required to pay the levy on the disposal of that waste to the landfill. This significant impact on councils will necessitate the early removal of these facilities which will result in reduced service to our communities and the potential of increased illegal disposal including littering.

Communication

The proposed strategy does not incorporate a levy on municipal solid waste (MSW), yet it contains ambitious recycling targets of more than 100% increase on 2008 recycling figures over the next four years and close to 180% by 2020. Whilst Council is not advocating for the introduction of a levy on MSW, it does recognise that without a monetary incentive to change behaviour, there will need to be a significant community education and communication program implemented. This will need to compete in an already crowded community education arena.

Changes in water consumption experienced in South East Queensland in recent years is evidence that education and communication when coupled with regulation can effectively change community behaviour in a relatively short-time frame. Council believes the education and public consultation programs relating to waste management must be State led and funded but delivered at a local level.

It may also be beneficial to establish a range of targets to accurately monitor the success of any education program implemented. Action 26 indicates that a biennial survey is to be undertaken; however, it is unlikely that such a survey would provide any meaningful measures of the effectiveness of a keystone program without specific targets being set.

The Strategy proposes a focus on waste avoidance to be achieved through behavioural change. To achieve this objective, the community needs to be educated and supported to make responsible purchasing decisions. With the levy on industry waste likely to be passed on to the consumer, an education program encouraging responsible purchasing decisions coupled with implementation of programs, focusing on producer responsibility and accountability will support waste avoidance and increased recycling.

Similarly, the establishment of industry codes of practice and easy to understand guidelines for business or industry to save costs by waste avoidance and minimisation.

Additionally, Council is requesting communication that promotes the disposal levy as a State levy as, without such communication, the additional cost will be seen to be imposed by the waste service provider.

Legislative Frameworks

Historically, rigid and unachievable standards have been seen as an impediment to reuse and recycling and an example of this is that building codes/standards have resulted in difficulty in obtaining engineering certification for paving using recycled concrete. Council would encourage government driving on-going review of engineering, building and other standards and guidelines that reflect technological advancements supporting recycling opportunities. Without on-going review of new opportunities and revision of standards reuse opportunities may continue to be inhibited by dated policy.

Council supports contemporary legislation that is sufficiently prescriptive to be effective and enforceable, but with adequate flexibility to enable support for local complimentary strategies in recognition of Queensland's diversity.

A current example of this is where the Environmental Protection (Waste Management) Regulation requires a minimum weekly waste collection service to serviced premises but provides for a recyclables collection at intervals determined by the local government. Amendments to current legislation which may provide greater flexibility to local governments, similar to the example, to establish the effective waste to landfill reduction strategies may assist greatly in realising desired outcomes.

Action 15 in the Strategy addresses household green and organic waste collection and suggests a third bin system to be collected alternatively to recyclables. It may be more appropriate that green and organic waste be collected weekly and the general waste be

collected alternatively to recyclable waste on a fortnightly cycle to encourage reduced waste to landfill.

The thrust for waste avoidance or, at least, minimisation needs to be the primary outcome from any future strategies for the waste industry and should permeate all new legislation on the waste industry. A legislative framework that supports the waste hierarchy and targeting waste generation at the source is essential to the impetus for the change required. The extended producer responsibility aspect of the Strategy, if enacted, is to be applauded as this will be a vital step in reducing waste generation. Council encourages this aspect being incorporated into new legislation

Funding and Support

Council has worked collaboratively with other Central Queensland local governments for a number of years and is committed to the continuation of these partnerships as well as working with the State to realise a sustainable waste management model.

The draft Strategy defines sustainability as “affordable”; however, unreasonable requirements such as amended charging regimes and significant unfunded infrastructure requirements to meet the provisions of the new legislation will be intolerable on local government. The Council would expect that the financial support and flexibility being pledged in the draft by the State will be forthcoming to enable this Council to work with the State and contribute to the realisation of the Strategy goals.

General comments on the Strategy

The Challenges identified are valid and provide a solid basis on which to develop a strategy and there is value in the identified Actions when reviewed based on the information available.

The Strategy is proposing to use the typical waste hierarchy as the main tool in its promotion; however, consideration should be given to the addition of another layer or a supplementary requirement to the hierarchy. This layer should focus on the developer and/or manufacturer “making it easier” for the retail sector and consumer to recycle, this could take the form of a greater push for recyclable packaging, development of recycling programs in accessible locations or similar. It is suggested that this is needed as the Strategy is seeking a significant cultural shift in a relatively short period and a direction that the standard hierarchy does not adequately accommodate. The necessary emphasis will require the breaking of the “business as usual” cycle and a new approach taken.

Finally, it is imperative that the Strategy identifies actions and accountabilities to combat waste at each step of the hierarchy with a strong emphasis on the first 2 steps.