

THE RUBBISH REMOVERS

John Erhard

www.therubbishremovers.com
PO Box 242. Underwood QLD 4119

Ph Office 07 3299 1501
Ph Mobile 0418 73 00 76

ENTERED
02/08
DJE



RECEIVED
29 JUL 2010

To the department of Environment and recourse management.

Thank you for the opportunity to provide a submission toward the 2010 – 2020 waste strategy.

The reason for my submission is to raise the profile of small business in the overall process of the implementation for the proposed legislation. Small businesses make up a large section of the overall waste industry however my concern is that the legislation will be introduced with the big players and municipalities in mind. The independent small business operators do not have the resources of the larger operators and as such will be the sector of the industry that will be impacted to a greater degree .On page 14 of the waste and consultation draft Under the heading of Sustainability it points to “facilitating and developing sustainable local solutions for local issues” and again under the heading of engagement it says “Taking the views of all stakeholders into consideration”. You only have to do a search through yellow pages and the local paper to see that privately owned skip bin and the small rubbish removal businesses are everywhere I believe that the small business sector with its concerns and employee base need to be represented on your stakeholder advisory committee.

I am the owner /manager of “The Rubbish Removers” based at 8/170 North Road, Logan central. We commenced our small business in 1984 with garden maintenance specialising in both domestic and commercial, adding the garden bags and the skip bins as the years moved on. Our business is a successful and growing small business, presently employing eight people.

We have 1700 customers who use our garden bag service on the South side of Brisbane and 90 skip bins to remove household and garden waste servicing the Brisbane Metro area - including up to Caboolture, out to Ipswich and also to the Gold Coast.

Through the operation of our business over the past 26 years we have seen first hand the indiscriminate wastage of resources and fully support the initiative to bring in a waste levy. However, I have strong concerns in regards to the implementation of the waste levy.

1. How is it possible to define who is commercial and who is private?

If the consumer/waste generator has access to the dumps without the burden of a waste levy then only the elderly or socially disadvantaged and those without trailers/access to trailers will have to pay the commercial operator the waste levy to remove their house hold waste. Municipal solid waste is the bread and butter of the independent skip and rubbish removal business. The household market is price sensitive and very competitive. For the levy to be charged or not charged on the same rubbish, depending on who is taking it to the dump, is likely to drive many of the independent rubbish removal businesses to look for loopholes to avoid the levy. I believe the system may be open to commercial operators bringing waste to a yard and transferring it to private vehicles masquerading as a private self haul operator when it comes to paying at the tip gate, thus avoiding

the waste levy and having an unfair competitive edge in the market place. It could also lead to an increase in illegal dumping by some commercial operators who place no emphasis on good waste disposal practices driven by environmental conscience.

If practices are to change right across the population, the waste levy should be for both private consumer and commercial operators. I believe this is the case in some other states of Australia. I do not believe we need to complicate the system by segregating private from commercial when it comes to the waste levy. After all, privately generated waste only becomes commercial because businesses like ours collect it and take it to the landfill. We do not generate the waste - we simply transport it to the landfill site. The private consumer/generator under the proposed levy, can take their waste to the dump thus avoiding the levy and avoiding recycling for the cheap and easy option of landfill. Without the trigger of a levy for the consumer/generator, it will be business as usual.

2. Incentives

The present council system provides no incentive and has serious disadvantages for independent operators. As one of many of these privately owned skip bin and rubbish collection operators we would like to see all of the independent operators brought under the umbrella of an approved association such as the Demolishers, Recyclers & Asbestos Contractors Association of Queensland Inc. (we are a member of this association). The purpose of this proposal is to give independent operators a voice. It would also allow the relevant authorities an avenue by which they might communicate any legislative requirements or proposals. I am sure some type of incentive could be worked out that would entice the independent operators to come under one umbrella.

Our Vision

We at The Rubbish Removers collect between 30-40 tonnes of waste per week. It has always been our vision to start a resource recovery and reuse facility and to funnel the profits into our charity projects. A reuse facility would also be of benefit in our community through the provision of employment and the saving of our precious environment. We need a reuse facility with trained staff who will sort the waste into the waste streams required for recycling. At present there is no facility set up to cater for the needs of the independent operators. These private operators do not have the time, equipment or safety measures in place to sort through a skip bin or truck to do resource recovery at the "tip face" leaving no other option than to dump into landfill.

When the waste levy is introduced in July 2011, for the independent operators, it will be a business as usual approach, they will still dump into landfill and pass the levy on or they will look for loopholes to avoid paying the levy. Unless a facility is provided the costs will go up but the practices won't change.

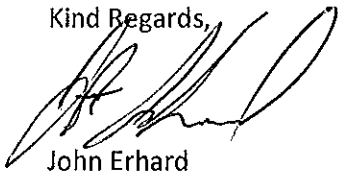
Our vision is to see resource recovery hubs for independent operators to be able to dump their loads into hook lift bins. These bins could then be brought into the main reuse facility. The reuse facility could be set up as a social venture project and the sorting could be done by people who are socially disadvantaged or marginalized because of a disability. Our waste streams are perfect for recycling, being mainly the retail and household markets with metals (HWS, fridges, washing machines), saleable items (furniture, bric-a-brac, household items), green waste, etc. The combined tonnage that independent operators are doing would be more than any of the larger companies yet we remain a largely ignored sector of the waste removal industry.

The Government has announced that it will provide funding of \$15.9 million for 2010-11 which will go toward the reforms of our industry. The reforms include significant funding for direct assistance to businesses to recycle and provide new infrastructure to improve waste management. I am under the assumption that any financial assistance in the way of grants will go to "big" business or municipalities and am skeptical that this type of assistance will be offered to small business.

Although grants are needed for small business to have reuse facilities and resource recovery hubs, we do not advocate a total handout policy, but more a dollar for dollar input by the government this would be an incentive toward those recyclers who desire to recycle yet are hamstrung by the burden of expensive infrastructure costs. The commitment to the business of recycling would be shown by the desire to risk their own dollars toward investing in the business. With hard earned dollars invested in the business it would create a desire to work harder to introduce better systems and practices and to strive for success.

We have built our reputation over many years and have grown our business steadily and sensibly, however the cost of establishing a recourse recovery centre is beyond the financial capabilities of even the most efficiently operated small businesses. To start a co-operative for the independent small business operators is do-able if the government is willing to consult and support our desire to have one.

Kind Regards,



John Erhard

28/7/2010