



Submission on the Draft Qld Waste Strategy 2010 – 2020.

Submission from

Scenic Rim Regional Council (SRRC)

Overall Comment

The draft document has many positives and the actions outlined are commendable. The DERM has listened to comments from Local Government since releasing its first draft of the Waste Strategy approximately two years ago. Following are comments on various aspects of the draft Waste Strategy.

Targets (page 19)

The targets are generally supported – provided they remain voluntary targets and they are NOT made mandatory. The targets will give local government and also industry, targets to aim for. The reason the targets must remain voluntary is simple – rural areas are at a distinct disadvantage to urban councils. Brisbane City Council can provide a green waste collection service (third wheelie bin) to city householders at a cost of \$65 per annum. Preliminary cost estimates for SRRC to provide the same service is approx. \$150 per annum. The major reason for the extra cost is that SRRC has less houses to service and a far greater distance to travel between houses to perform such a service.

The public's willingness and/or capacity to pay \$150 p.a.(versus \$65 p.a.) will diminish greatly. SRRC is concerned that we might try to achieve the target set for 65% recovery and/or recycling for MSW, but we may fall short. We might never achieve what larger urban council's can achieve due to higher costs for providing similar services.

Another reason for the voluntary targets is that the DERM readily admits that the baseline data on the quantities of waste generated and recycled is somewhat 'dodgy'. This is particularly so for data for Commercial & Industrial waste and also for Construction & Demolition waste.

Climate Change Targets (page 19)

There are two climate change targets listed on page 19, namely:

- "33% for household greenhouse gas landfill emissions
- 50% for total landfill emissions"

To meet these targets SRRC will need to install landfill gas equipment at its Central landfill. Landfill gas equipment is very expensive. All of the SEQ councils with BIG landfills have already done something with their landfill gas, as it is commercially viable. It could cost the remaining councils millions of dollars to install landfill gas equipment. Below are some ball-park cost estimates for SRRC to capture its landfill gas emissions:

- \$1M to cap existing landfill cell #1

- Drill gas wells to tap gas - \$0.5M
- Install a gas flare - \$0.25 - \$0.5M
- Or create green electricity - \$0.5M – \$0.75M for a generator.
- Possibly \$50k operational costs p.a.
- If a flare is installed = \$ zero Revenue p.a.
- If a generator is installed - \$ unknown revenue p.a. from green electricity
- Then in 3 years time we will face similar costs again to capture gas in our landfill cell #2
- Then in 5 years time we will face similar costs to capture gas from our landfill cell #3.

Closed landfills or landfills to be closed soon will generate gas for 20 – 30 years & longer. The targets could have a very bad impact on the long term costs for these sites, unless they already have gas equipment on them.

We need to create a baseline for measuring the quantum of landfill gas being produced at our landfill?

- How do we do that?
- How do you work out how much landfill gas you produce?
- How can you reduce by 33% something you cannot accurately measure in the first place?
- Authorities could not agree to a methodology under the proposed CPRS to calculate landfill gas production.

SRRC would prefer to see these targets removed. They have already been met by the big councils, but may well prove to be a huge cost impost for smaller councils. At the very least, the targets must not be a mandatory requirement.

SRRC believes that these two targets should be scrapped and perhaps be re-considered in a few years' time, when the Waste Strategy is reviewed.

Costs to Collect the Waste Levy

Council has spoken to a software firm who have outlined a computerised system at our Central Landfill and our 7 Transfer Stations. The costs in summary are:

- Central Landfill – new computer and software - \$30,000
- 7 x Transfer Stations – Hand held equipment - \$30,000
- Staff Training is included in the above costs
- Changes to signage at the 7 sites (\$500/site) - \$ 3,500
- \$63,500 Total
- Both systems are linked together and data is stored on one central computer
- No funds available in 2009/10
- Council will be relying on DERM to fund this equipment (100%)

Council has only one landfill and it already has a weighbridge. The transfer stations are too small to warrant weighbridges. All these sites are currently manned; so extra staff will not be needed.

Waste Levy: Cost Impacts on the Public

The proposal that the waste Levy does NOT apply to Domestic waste is to be applauded – *Well Done!!*

SRRC is a largely rural Council. Business will all be subject to the waste levy. Council has grave concerns that Rural Industries (farmers) will suffer from the \$35/tonnes levy. Is there a way of exempting primary producers? Or possibly rewarding them if they recycle and /or use compost and compost products on their crops e.g.: encourage a waste to compost cycle?

Council is also concerned about the waste levy impacting on:

- Small business
- Charities and voluntary organisations
- Sporting clubs

Can some of these organisations be exempted? Or can they be rewarded in some way if they do Recycle much of their waste?

Waste Levy: Cost Impacts on Council Operations

The proposal to exempt Council street sweeper waste and waste from street and park bins is commendable – *Well Done!!*

This levy will add costs to for waste disposal from:

- Council administration offices
- Libraries, community halls, pools and so on
- Road and drainage works
- Council demolition/construction projects
- Any Council project that generates waste.

The basic aim of the waste levy is to increase recycling and increase waste to landfill. If Council takes action to use:

- Recycled goods
- Recycled road making materials
- Recycled compost/compost products; or
- Avoids waste production.

Can we get some form of reward or incentive? This would encourage faster behavioural change and lead to less complaints about the levy.

If illegal dumping increases due to the Waste Levy; Council may face increased costs e.g.

- \$50,000 (1 x extra enforcement officer)
- \$50,000 (extra clean up costs)
- \$100,000 Total per annum

Council will need assistance with any increased enforcement costs.

How to Calculate the Waste Levy by Volume?

Whilst the Waste Levy will be charged at \$35/tonne; how does that convert to a volumetric rate? How do we know what figure to add to our Garbage Rates for:

- 240L commercial waste bins
- Bulk commercial waste bins
- Loads of Commercial and Industrial waste received at our small transfer stations (no weighbridge).

Council believes a working group should be set up to examine a fair method of arriving at a volumetric conversion figure for the Waste Levy.

Legislation (Waste/Litter)

The DERM has to "toughen up" the State waste/litter legislation. Businesses avoiding the waste levy could resort to illegal dumping. Council will need financial assistance if littering/illegal dumping rises once the legislation is introduced. A ball park estimate was \$100,000 p.a for SRRC; but the quantum of the increase is virtually unknown.

The increased Regulatory matters in the consultation document (page25/26) are commendable, but more is needed.

We need to ensure that:

- Revenue from Local Government issued waste/littering fines goes 100% to that Local Government
- Harsher penalties for littering and illegal dumping
- Easier means of issuing on the spot fines (like in Victoria)
- Third party reporting of litter offences
- Serious offenders – will forfeit their car/ute/trailer/truck if they are caught dumping illegally (same as fishing laws).

Proposed Funding/use of Levy Money

The DERM proposal is to set up the following funds:

- Waste Avoidance and Resource Efficiency fund (\$159m)
- Sustainable Future Fund (\$120m)
- State Environmental Initiatives (\$100m)

In a word – ***Brilliant !!***

Council believes that about 70% of Waste Levy revenue will come from private landfills. If some of this can flow on to Local Government – ***Wonderful !!***

DERM needs to ensure that the Funds be readily available so they can easily flow to worthy Local Government projects.

One concern is too much red tape/accountability will make expenditure of the funding difficult. You may need to fund a supervisor for the project just to meet accountability requirements.

Comments on the Action Plan

The 26 Actions summarised in the Action Plan (pages 34-39) are fantastic. Council looks forward to their successful implementation. Following are a few comments on some of the Actions.

Action 4: Strategic Waste Management Planning

There needs to be an action to include waste/recycling and waste avoidance measures in the Integrated Planning Act and Local Government Town Plans.

Waste/recycling and waste avoidance is poorly addressed or non existent in many Local Government Planning Schemes. Change is needed in this area.

The new Local Government Act requires every Local Government to create a "Community Plan". Waste/recycling and waste avoidance issues are of great interest to the general public. They must be mentioned in the New Community Plans. Can this new legislation make Local Governments act to include waste/recycling and waste avoidance in their Planning Scheme and Community Plans?

Action 4 needs to be strengthened or a new action added on these matters.

Action 15: Household green and organic waste collection

This action is commendable; but the Action Plan does *NOT* address "*Compost at Home*". Composting or worm farming at home is *NOT* for everyone; but many are interested in this concept.

In rural areas; composting at home; feeding kitchen scraps to the chooks (vegetables) and dogs (meat and bones) is a viable option. The cost of an organic waste service in many rural areas may be too high. Instead of that service, a "Compost at Home" program (Action) would be of benefit.

SRRC would recommend a new Action to create a "Compost at Home" program.

Action 17: Target 150

Some comments on this proposed Action are:

- Commendable in principle
- Will need minimum of \$10m advertising p.a. to make this successful
- How do you readily measure 150kg of waste
- Water was easy to measure – just read your meter
- Should be a National Target of 150kg
- Should be State and Federal funding for Target 150
- Must be Federal funds for improved recycling of e-waste, batteries and CLF's

Action 20: Online Resource Exchange Register (RER)

The RER proposal has been tried before in QLD; but failed. Best of luck with this proposal. Why not use existing selling networks like "The Trading Post" and "EBay" instead of creating and marketing something new. The Trading Post and EBay are established and have strong customer support already. Why not approach them to include a RER as part of their business – a proposal to expand/grow their business?

Action 21: Business waste avoidance and resource recovery program

This is a commendable program, but it will *NOT* work if it is just to be conducted "on-line". You need officers (helpers/enablers) to visit the businesses and offer practical tips/guides on how to change and what to change. Face to face contact is very important; as well as online support.