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## **QUEENSLAND'S WASTE STRATEGY 2010 TO 2020 PROPOSED INDUSTRY WASTE LEVY CONSULTATION DRAFT**

SITA Environmental Solutions (SITA) is a leader in the provision of advanced resource recovery, recycling and waste management services to over 3 million residents and 43,000 businesses nationally. Our solutions are tailored to the needs of our customers and include: household, commercial and industrial collection and recycling; organics collections and resource recovery through composting and subsequent sale; e-waste collection and processing; waste generation audits; secure product destruction; medical waste collection and innovative recycling; advanced engineered landfill disposal services, and transfer facilities.

SITA welcomes the introduction of a waste strategy in Queensland as the introduction of market-based instruments, such as a broad-ranging waste levy, will promote additional recycling and resource recovery activities.

Nationally, the introduction of comprehensive waste strategies have supported commercial operators such as SITA to invest in the required infrastructure that drives the diversion of the valuable resources within the waste streams from landfill disposal.

Levies, particularly on MSW, have led to the investment of hundreds of millions of dollars in Advanced Resource Recovery Facilities around the country. These facilities focus in particular on the household garden (or 'green') and food waste, as well as organics from supermarkets, food processing and other commercial operations, as it is the rotting of organics in landfills that causes greenhouse gas emissions.

SITA also supports the ALOA and WCRAQ submissions that have or are soon to be tabled.

*A Sema/Sita Company*

However, SITA has a number of concerns with the draft waste strategy in its current form and submits the following for consideration:

1. MSW and self-haul not being included in the current waste levy proposal. This exclusion raises significant issues for both Councils and the waste processing industry:
  - Advanced Resource Recovery Technologies (ARRT) such as those that SITA operates in NSW and WA are constructed on guaranteed supply of waste for 15 to 20 years – no ARRT will be constructed based solely on C&I waste processing, as no business will enter into such a long term contract. All ARRT's in Australia rely on residential MSW contracts to operate;
  - MSW will continue to be imported over state lines to take advantage of cheaper landfill rates in Qld;
  - Many Local Governments use MSW collection vehicles to collect local businesses waste (i.e. C&I waste) – not having the same levy on MSW as C&I will cause significant administrative and logistical problems for Councils and their contracted collectors. This is exactly the reason why the Victorian Government recently placed the same levy on C&I as MSW with the same escalation rates.
2. The definitions of the waste streams must be clear and harmonised across all jurisdictions – they need to align with the waste codes used federally and in other states to ensure consistency. For example, how will quarantine waste be classified after being autoclaved or incinerated?
3. Clarity around how specific sites are to impose the waste levy, as there appears to be ambiguity on whether the levy is strictly a landfill levy. For example, will the levy apply to incineration, autoclaves or composting operations? How residual will from ARRT plants be classified where there is a mixture of MSW and C&I.
4. Regulations need to be finalised in conjunction with key stakeholders to ensure that legislation is in line with the intent.
5. The aggressive timeframe set down for implementation will require immediate consultation with key stakeholders which includes the waste management industry. The administrative impact due to invoicing clients and/ or levy collection will be dramatic and therefore a suitable lead time will be required.
6. The current proposal does not have a clear action plan on how to ensure that the data is collated accurately and how landfills and transfer stations that do not have weighbridges will be able to conform in the early stages of the implementation program.
7. The distribution of the proceeds of the levy is unclear and should identify how they will be distributed. Hypothecation of the levy revenue back to the Councils has shown significant acceptance in other jurisdictions compared to where little or no hypothecation has occurred.
8. There will need to be a targeted education campaign by the State Government to advise businesses and the community on the waste levy to avoid the "push back" to the waste industry and Local Government, as we will be the collector only.
9. There has been no consideration for exclusions of any waste types, eg. Floc. Some states have exclusions on landfill daily cover, etc. This needs to be considered moving forward.
10. The implementation of the waste levy should be introduced to the south east corner of Queensland initially. This is where approximately 90% of the state's waste is generated, and where the greatest impact on recycling and resource recovery rates will

occur from industry investment in the required infrastructure.

SITA congratulates the Queensland State Government on its initiative but the current strategy will not drive the investment required at the speed required. SITA looks forward to working with the policy planning groups in an effort to ensure adequate implementation.

Kind regards,  
**SITA ENVIRONMENTAL SOLUTIONS**

Brian Cohalan  
**STATE GENERAL MANAGER - QUEENSLAND**