

SUBMISSION TO  
THE DEPARTMENT OF ENVIRONMENT, AND RESOURCE  
MANAGEMENT

ON THE  
DRAFT STATE WASTE STRATEGY AND LEVY

BY THE  
SUNSHINE COAST COUNCIL

**Key points are**

- The levy and the thrust of the Strategy are supported subject to more detail on implementation etc. That support is contingent on the hypothecation of the majority of funds to improve waste minimisation using an incentive or performance-based approach.
- SCC strongly believes that the levy must not apply to domestic wastes as Local Government has and is already expending considerable funds to recycle those wastes.
- SCC believes that the Strategy and levy should be administered by an independent board as was requested by the majority of consultees and follows the successful South Australian model. If not, the “advisory” stakeholder bodies should report directly to the Minister to increase transparency on where and how funding is allocated.

Sunshine Coast Council: Submission on draft State Waste Strategy

- Waste Targets should be for waste diverted from landfill, not simply recycling, to better accommodate waste to energy initiatives. The targets should form the basis of the incentive payments.
- SCC wants to be represented on the Stakeholder body that administers the funds and wants to see a majority of Local Government on the SFF board.
- SCC does not believe that LG “early adopters” and better performers should be penalised by the levy funds flowing disproportionately to those LG’s who have been slower to improve their waste management or are in remote locations where recycling is problematic.
- The State needs to provide more certainty for investment in the waste industry by requiring a specified level of diversion for disposal facilities as happens in Sth Australia. No one, including local government, will invest in an expensive recycling or waste to energy plant when the DERM can licence a cheap landfill that captures half your existing commercial waste business (as happened to Cairns and Pt Douglas Councils). Targets could be included in ERA licences or be adopted as law in each specific LG area to enable the targets to be flexible according to the situation in each LG to ensure a “level playing field”. **Whatever the solution, resolution of this issue of certainty and “level playing field” is critical to achieving the Strategy’s outcomes.**
- Qld should mimic the very successful Sth Australian ban on single use non-compostable plastic bags.
- SCC supports DERM’s commitment to reducing illegal dumping in partnership with Local Government but note that it will require increased resourcing of Local Government.
- DERM needs to place more emphasis on, and resourcing for, regulation and enforcement to ensure a level playing field.

Sunshine Coast Council: Submission on draft State Waste Strategy

- SCC believes that they should be able to charge an appropriate and transparent headworks levy on any development that is going to significantly increase waste infrastructure costs.
- DERM should be more involved developing policies and strategies for reducing packaging and junk mail.
- The Strategy should put more emphasis on ways of reducing greenhouse gases from landfill and the SCC believes that waste to energy can provide a useful role in that.
- There are a number of critical policy matters that will determine the implementation of the Strategy. Issues, such as mixed waste compost product regulations, are fundamental to Local Government decisions. The EPA must commit sufficient resources (certainly far more than it has in the past), to determine these issues in a timely manner.

Sunshine Coast Council: Submission on draft State Waste Strategy

1. The SUNSHINE COAST COUNCIL (SCC) welcomes the draft State Waste Strategy and the certainty it brings to an area of public policy that has required better stewardship for many years. SCC congratulates the Minister and staff for addressing this issue and looks forward to fruitful co-operation on waste management issues.
2. In most cases, the SCC will focus its comments on the issues in the draft Strategy that we disagree with. We are in general support of the other features. For example, the intention NOT to levy wastes segregated for recycling, is a far more positive approach to the blanket approach of NSW. However, we believe there is going to be significant issues of detailed implementation, particularly on how the levy is assessed and what projects get funding. That implementation will require close consultation with Local Government and the SCC looks forward to being a close part of that process.
3. The SCC is looking to be a leader in waste management. However, to do so requires significant investment. That investment is predicated on certain types and volumes of waste being available for charging and treatment. SCC and most other players will not invest without some security that DERM will not simply licence a cheap disposal option nearby. The levy will have some value but is unlikely to be sufficient to make up the price difference between, for example, a cheaper landfill versus a much more expensive waste to energy plant or recycling facility. DERM must articulate how they will manage this situation or face little progress in sophisticated waste facilities that are not cross-subsidised by the levy.
4. The SCC supports the waste levy in its current form subject to clarification of a number of details. Local Government has no way of identifying commercial waste within its kerbside collection and believes a simple proportion of total collections may be the simplest way to assess levy liabilities. SCC believes that the levy must not apply to domestic wastes as SCC already spends enormous sums on recycling that waste.
5. The SCC believes that levy funds should be hypothecated, **in full**, back to improved waste management on the basis of performance against agreed benchmarks. This should also reward the existing “early adopters” who have already invested in better systems.

6. The SCC remains convinced that an independent body is better placed to administer waste management at a state level and commends the very successful and cost-effective South Australian model to DERM and the Queensland Government.
7. If this is not to be the case, SCC strongly believes that the actions in the Action Plan that pertain to Local Government be funded from the State Government's proportion of the levy funds or be decided by the Stakeholder body. The SCC believes that the Stakeholder bodies for the levy funds report directly to the Minister to ensure transparency and control.
8. SCC believes that those stakeholder groups should be established as soon as possible as the details of the levy and its collection will involve significant work and negotiation. The SCC requests specific membership of that body and believes that Local Government should have a majority on that body. Given the pro-active role taken by SCC and its significant population, this is quite appropriate.
9. The targets are ambitious but realistic for those areas within economic reach of the major recycling facilities. Consideration should be given to a lower target for rural areas to account for their isolation and transport costs.
10. SCC believes that the targets should be for "diversion from landfill" i.e. for recycling AND waste to energy, rather than simply for recycling, as this will open up further opportunities for renewable energy generation from waste materials.
11. SCC believes more emphasis should be placed on reducing greenhouse gases from landfill and that immediate assistance should be put in place to assist landfill operators to install gas capture and flaring systems or bio-active covers of compost on small sites.

12. SCC welcomes the State's commitment to funding action to stop illegal dumping. SCC believes that the lack of strong enforcement is a critical factor in discouraging the investment in better waste management and capitalising on our wasted resources. There are some very complex town planning issues to be resolved before effective enforcement is possible.
  
13. SCC believes that DERM will need to greatly increase the speed and efficiency of its standard setting, licensing and market development. For example, this levy and targets will see a massive increase in compost production which raises issues of standards for AWT-derived composts. The State can assist greatly by enforcing progressive mine site rehabilitation and establishing the regulatory regimes necessary for certainty of investment.
  
14. The SCC remains fixed on the goal of recovering resources to benefit our local economy as much as protecting our environment. For this reason, the development of businesses to utilise recovered resources has as high a priority as the waste management issues themselves. For that reason, SCC believes that the WARE fund should be available to businesses that utilise a majority of recovered resources.
  
15. The SCC believes that more needs to be done by DERM on setting a level playing field for LG and private sector participants. Setting targets is fine for responsible bodies but will not affect those who wish to simply landfill and pass on the costs nor those who wish to pick the most viable materials out of the waste stream for recycling and leave the uncommercial residuals for Local Government to handle and ratepayers to subsidise. SCC believes that the targets must be reflected and mandated in ERA licences to ensure all players are competing equally.

16. The SCC also believes that DERM will need to consider the issues of economies of scale in local or regional waste facilities. SCC believes that its system of maintaining overall control but allowing market competition each contract term provides both the economy of scale with the necessary market testing and competitive pricing across the whole spectrum of wastes, rather than a focus on only the most cost-effective resource recovery as happens where commercial competition is unfettered.
17. The draft Strategy is aimed at facilitation of a better waste system and that is supported. However, the regulatory side of the equation has been largely ignored. Currently, the facilities and businesses that do not meet licence conditions benefit commercially against those who are spending money to achieve compliance. In other words, the State government is commercially rewarding the law breakers and punishing the responsible operators. It goes without saying that the waste system in Queensland would benefit greatly from a much stronger enforcement of current laws. It is essential that the State's share of the levy is used to this effect.
18. SCC believes that not enough use of regulation and education has been considered. For example, regulatory requirements to recycle a proportion of Construction and Demolition wastes will achieve more outcomes than simply instituting a levy that most builders and demolition contractors will simply pass on to their clients. The DERM could also develop practical "how to" guides for builders as has been done in Victoria.
19. The SCC wishes to explore removing organics and health care products from the waste stream through dedicated weekly collection. However, the costs of weekly collection of the residual bin at weekly intervals (as currently required by law), is overly onerous. SCC believes that the State should change its control to a performance-based system that is dependent on the impacts on amenity and public health.
20. The SCC believes that the Qld Government should follow South Australia's very successful lead on banning single use non-compostable plastic bags.

21. The SCC is experiencing significant growth pressures and believes it should have the legal ability to levy infrastructure charges for waste facilities on development applications to help cover the massive costs of new waste and recycling facilities.
22. SCC does not believe that many of the Actions listed at the end of the Strategy are the most cost-effective way to progress waste management. For example, the recycling of e-waste that is scheduled for 2011, is better held until the Federal system is finalised in 2012. SCC believes that all those actions need to be discussed by the stakeholder groups and adopted or replaced according to their analysis.
23. SCC believes that more emphasis should be placed on techniques like cleaner production and extended producer responsibility to ensure manufacturers and packagers are held accountable for the recyclability of their wastes. The European experience is a successful model that could be followed.
24. The issue of reliable performance data will be a challenge. The Federal Government has announced that they will be working on standardising data and definitions. Similarly, this Strategy will require very clear definitions and new weighbridge and rating systems. SCC believes that the system be made as administratively simple as possible to avoid wasting money that should be going to improved waste management.
25. The State needs to address the issues of the massive growth in junk mail and packaging wastes. The Packaging Covenant has been largely ineffective. For example, glass has been “light weighted” now to a point where kerbside recycling is “losing” to landfill well over a third of the bottles placed by ratepayers for recycling. While the environmental savings in lighter bottles may be, on balance, the better outcome, Local Government is paying a significant premium trying to recycle a very difficult material made more so, in spite of the Packaging Covenant. Queensland should explore a more regulatory approach, advanced recycling fees or container deposits as has worked so successfully in South Australia.

26. The SCC is moving at a pace that requires the answers to these difficult policy and practical questions to be developed now, so that our financial analysis has some certainty and is ready for letting new contracts in 2012. This would be far more valuable for waste management than the intention to produce “guidelines” for AWT’s which are likely to be out-dated by the time they are printed. There are a number of complex policy issues that have been raised with the department that have seen no response of substance. Issues such as the regulatory framework for MBT composts will need some certainty or the waste industry will simply refuse to invest as is happening currently in NSW. The DERM will need to invest more resources in resolving these issues than it has in the past.