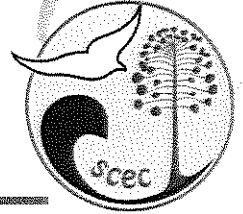


# SUNSHINE COAST ENVIRONMENT COUNCIL Inc.

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29 July 2010

Project Manager – Queensland's Waste Strategy consultation  
Natural Resources and Environment  
Department of Environment and Resource Management  
GPO Box 2454  
BRISBANE QLD 4001

Re: *Sunshine Coast Environment Council Response to the Draft State Waste Strategy*  
*and Landfill Levy*

The Sunshine Coast Environment Council (SCEC) welcomes the production of the State Waste Strategy and commends the Government on finally acting to catch up with the rest of Australia. Unfortunately, SCEC believes the Strategy, as currently drafted, will do little more than marginally improve the current situation and the vacuum that has existed within the State Government since the Labor Government consistent refusal to fund the previous Waste Strategy.

## **1.1 The levy**

SCEC does not believe the draft Strategy is a comprehensive or integrated approach. Its emphasis is on the landfill levy and the actions that the income stream can deliver. While ensuring an income stream for waste management is a step forward, SCEC believes the exclusion of domestic waste remains a fundamental flaw. SCEC also believes that this landfill levy is a very poor way to influence appropriate or well targeted resource recovery. Its value is as a revenue stream to provide funds to do good deeds. SCEC has little confidence that this will be efficient or effective. Indeed, the immediate effect of the levy is

likely to be that no organisations will move forward substantially until the levy funds begin to flow in 2012/13.

## **1.2 No Independence**

The State's rejection of the over-whelming call for an independent body to manage the waste Strategy and levy is a major flaw and lost opportunity to follow the successful South Australian model. In SCEC's view, South Australia is currently leading Australia in sensible waste management – the container deposit schemes, the plastic bag ban, the assistance programs and the regulatory under-pinnings. Sadly, Qld has lost yet another opportunity to learn from those who have been the major achievers. SCEC believes DERM and the Qld Government could simply copy most of what SA does and replicate it here. The only issue is the need to tailor the Strategy to each Qld region in a way that represents a sensible allocation of the environmental dollar.

## **1.3 Inadequate Regulation**

The Strategy appears to have ignored the advances that could begin immediately through a regulatory approach. The only regulation appears to be on dealing with the illegal tipping caused by the levy. South Australia has recently announced that no waste will go to landfill without some resource recovery intervention. It would be a relatively simple measure to establish targets for different waste streams and materials on a regional basis and then to translate those into ERA licences.

Regulation of the waste industry, including Local Government, has been inadequate for many years. Landfill gas odour is obvious when you drive past the landfills at Nambour, Caloundra and North Lakes yet we are aware of little or no regulatory activity to enforce the EP Act. Certainly, whatever action has been taken is manifestly unsuccessful. Until DERM takes its regulatory responsibilities seriously, there is little hope of improvement and the disconnect between the Waste Strategy which seems hell bent on a warm fuzzy "facilitator" role instead of delivering the clear focused regulation and enforcement necessary. The contrast between NSW and Qld is instructive and has been confirmed by all companies that operate in both states.

## **1.4 Poor Investment Framework**

Through our participation with the Sunshine Coast Regional Council, it has become apparent that they are most reluctant to spend any significant money on C&D and C&I as DERM has the potential to licence cheaper private disposal alternatives as they did to Cairns. We are aware that the Sunshine Coast Council has attempted to get DERM to articulate its policy but to no avail. Without regulatory certainty on this and other fundamental issues, little investment will be made. If DERM waits until the income flows in 2012 before investing in sufficient resources to determine these issues, the lag before improvement will be even longer.

## **1.5 The targets**

The diversion targets are somewhat meaningless and appear to be simply lifted from other States with little relevance to Queensland's existing situation. There is no explanation about their role. They appear to have no basis in regulation but may possibly be a basis for incentive payments. This needs clearer definition if the targets are to have any effect. Also, the targets are utterly unrealistic once you leave the eastern seaboard. The environmental value of significant resource recovery in those far western regions is marginal and is dependent on the individual circumstances for each area.

SCEC believes that diversion from landfill is not the most important issue and it is reduction in environmental impact and recovery of resources for economic good and a more sustainable society. For example, diverting concrete has little value environmentally but significant value economically if there are markets for the product. The targets need to be a part of a far more sophisticated instrument or else they are bound to fail. They may well be but that is not obvious from the document.

## **1.6 Climate Change**

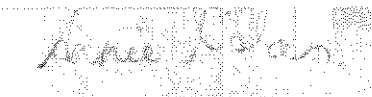
The other glaring omission from the Strategy is specific actions to address the existing and future greenhouse gas emissions from landfill. Landfill gas represents the major element of most Councils' emissions profile and in most cases is over half of their total impact. The

Strategy should articulate a threshold for landfills to have gas capture and flaring in place and that be incorporated into their licences for immediate implementation over the next three to five years. This is the one simplest and most cost effective environmental improvement that could be made. Indeed, Councils should be told that they must commence the planning and 50 /50 funding through the levy will be available in 2012.

Finally, SCEC believes that DERM must now produce a thorough and clear draft Waste Strategy that is based on a transparent analysis of the submissions. Given that little is likely to occur until 2012, there is plenty of time to get this pivotal document right. Indeed, clear articulation of the State's intentions on the private / public sector issue, issues such as the 3F gateway in NSW and mandated climate change action will enable all parties to commence planning with the certainty that the current high level document does not.

Thank you for considering our submission

Yours sincerely

A handwritten signature in cursive script, appearing to read "Anne Ryan", is written over a rectangular grid pattern.

Campaigner

Sunshine Coast Environment Council