



## Tablelands Regional Council

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Project Manager  
Queensland Waste Strategy Consultation  
Natural Resources and Environment  
Department of Environment and Resource Management  
GPO Box 2454  
BRISBANE QLD 4001

ENTERED

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DK

Dear Sir/Madam

### **QUEENSLAND'S WASTE STRATEGY 2010-2020 SUBMISSION**

I refer to the release of the Waste Avoidance and Recycling Consultation Draft and Proposed Industry Waste Levy Consultation Draft and submit on behalf of the Tablelands Regional Council the following points for consideration.

#### **Waste Avoidance and Recycling Consultation Draft**

- ♦ Council acknowledges the proposed creation of a Stakeholder Advisory Committee (SAC) and strongly suggests that a member of the LAWMAC Group of North Queensland hold a position on the SAC.
- ♦ In addition to the SAC, it is suggested that in an effort to co-ordinate Regional initiatives, a North Queensland advisory group be established as a voice to represent all Councils in North Queensland. This group could advise on regional allocation of funds, facilities and service provision. LAWMAC is an obvious forum for this however there are a number of Councils that are not currently actively involved in this group and would therefore need encouragement to be involved.
- ♦ Page 32 of the Draft document questions whether the recycling targets are appropriate. The targets of 50% suggested from 2014 and beyond will be difficult for Council to achieve. As suggested in the text on page 32, the metropolitan areas will outperform regional areas in reaching this target. This will mean that the target for metropolitan areas will need to exceed those proposed on page 32 to compensate for regional areas that don't meet the target. Are metropolitan areas able to reach targets in excess of those on page 32 such as 80% by 2020?
- ♦ Page 33 discusses illegal dumping. Council does not consider a target for litter and illegal dumping is appropriate due to the lack of appropriate benchmark data, the expected increase in illegal dumping with the introduction of the levy and the fact that the majority of illegal dumping items within the Tablelands area are tyres. Is consideration being given to improved tyre management practices to reduce the incidence of illegal dumping and increase recycling of tyres?

### Proposed Industry Waste Levy Consultation Draft

- ♦ Council's domestic kerbside collections also include a portion of waste generated via the commercial sector. It is not an efficient exercise to separate the commercial from the domestic waste in this case, therefore how will the levy be applied to the commercial sector?
- ♦ As a regional Council within the proposed levy zone, if Tablelands accepts waste from neighbouring Shires which are outside the levy zone, on a commercial basis, how will the levy apply to this waste?
- ♦ Will DERM be conducting a public education campaign in the lead up to the introduction of the levy, particularly targeting commercial operators? Council identifies this as critical to the effective introduction of the levy, particularly as Council staff are at the front line of imposing the levy upon operators. Public education will need to include information on weight conversion for sites where a weighbridge is not installed.
- ♦ Is it DERM's intention to introduce the levy to MSW in the future? If so, what is the time frame associated with this and would the levy apply to all MSW or only the self-haul waste? Council is mindful that applying a levy to the domestic kerbside-collected waste stream will not have a significant effect on encouraging waste reduction due to the generators not being directly impacted by the levy as it would be raised through the rates.
- ♦ It is understood that DERM intend to audit Council's records prior to invoicing Council for payment of the levy. To avoid ongoing administrative disruption at both the State and Local level, Council requests that DERM provide clear and concise reporting advice to ensure that an efficient administrative process can be put in place.
- ♦ If after the introduction of the waste levy, Council's waste data does not indicate any achievements in regards to the Strategy targets, will there be any penalties that will apply?

In addition to the above points, Council supports the attached comments prepared by LAWMAC.

Council looks forward to receiving feedback on this submission and seeing progress on the Queensland Waste Strategy 2010-2020.

Yours faithfully



**ALAN LAMBERT**  
MANAGER CORPORATE PLANNING PERFORMANCE & RISK



## Submission to DERM Queensland Waste Strategy 2010-2020

### **“Waste Avoidance and Recycling Consultation Draft”**

- LAWMAC members advise that whilst Packaging Strategies may be working well in SEQ they do not appear to be working as well in regional areas with waste generators not applying responsibility to best disposal of packaging items (cardboard/polystyrene etc).
- The levels of proof required for “Dob-in-a-Litterer” are regarded as unreasonable and too stringent to encourage positive responses and ongoing implementation of the program.

### **“Proposed Industry Waste Levy Consultation Draft”**

#### **LAWMAC responses to the proposed Landfill Levy**

- The introduction of a Waste Levy system can substantially change projections of current and future Waste Management Strategy Plans as developed by councils. Opportunities for funding related to any additional development costs of revised Strategies directly related to changes due to the Industry Waste Levy must be made available through the Waste Avoidance and Resource Efficiency (WARE) Fund upon application.
- Concerns are raised regarding the logistical and environmental costs of transporting waste from some remote shires in Nth Qld rather than land-filling as the cheaper (and possibly less environmental impact) option with members raising the issue that **“one-size-does-not-fit-all”** across the whole of Queensland with whatever working well in SEQ not necessarily viable in regional and remote shires of North Queensland.
- Due to the enormous differences in scale and logistics regarding costs incurred by regional and remote shires in NQ that widely differ from SEQ has a reduced levy rate been considered and if not why not? – The **“one-size-fits-all”** approach is unacceptable.
- The issue of “mixed waste” was another concern raised relating to the collection processes within some shires that does not allow for economically viable separation of domestic waste from other shire wastes during or following the collection process (levy being exempt to domestic waste).

- How will local government deal with "mixed loads" – maybe a reporting system should be required by transporters tracked by GPS?
- LAWMAC members are concerned regarding the potential increase of illegal dumping, in particular liquid waste, with the introduction of the landfill levy with the clean-up costs plus environmental restoration expenses being borne by local governments in North Queensland.
- What provisions has DERM considered regarding local government cleanup of illegal dumping on State Government owned land?
- Concerns are raised regarding what contingencies DERM will have in place to address non-payment of the landfill levy due to insolvencies, refusals to pay etc.
- LAWMAC members questioned the inappropriateness of "overnight" introduction of hazardous waste and how DERM expects local governments to undertake this task.
- The issue of inert waste from MRFs needs to be considered with residuals from recycling systems to be assessed through KPI efficiency targets and the levy charges pro rata.
- Weight/ratio to mass will create problems at those sites without weighbridges as obviously a full truckload of polystyrene will certainly weigh differently to a full truckload of other solid waste materials and levy rates are weight based.
- What level of funding will DERM be making available for local governments to install additional weighbridges to those sites that do not currently have weighbridges (and operate efficiently under the current system without the levy) and will this funding support be made available prior to the introduction of the levy to give local governments sufficient time to prepare in readiness for the levy?
- Some LAWMAC members are concerned regarding the processing of waste created outside Collection Zones (in Buffer Zones and Non-Collection Zones) which is subsequently disposed of inside Collection Zones where the proposed levy is applicable.
- Some smaller regional local governments of LAWMAC do not currently charge waste disposal fees (either not at all or not above cost recovery basis) to avoid illegal dumping within those shires and are concerned that the introduction of a waste levy could create reduction in responsibility for correct waste disposal.
- LAWMAC members are concerned regarding the issue of community backlash to local government regarding the implementation and collection of the waste levy at the "tip face" and call for a transparent process with collection dockets clearly identifying the levy as a state government initiative and also be supported by an advertising campaign for further clarification.

### **LAWMAC responses to Legislation of the proposed Landfill Levy**

- Clear definition of types of Waste is needed (particularly high and low hazardous waste)
- State Government must be more committed and take on more responsibility to assist and support local government with illegal dumping through more resources and better policing of legislation.
- LAWMAC members are concerned that Establishment Funding needs are under-resourced and the program is potentially overfunded and that timeframes are tight for commencement in July 2011 with the absence of weighbridges at sites within some shires further exacerbating the situation.
- The need for integration between local government councils and the State Development Process for general construction waste is identified (possibly a Waste Management Plan within the development/construction phase?).
- Why aren't private waste contractors legislated to install GPS Tracking Systems to avoid illegal dumping?
- What offences and penalties for non-compliance/avoidance are being included in new legislation and how do these devolve to local government?
- Legislation for On-Site Activities is difficult to monitor and police – needs a strengthening of legislation for implementation under the EPP Waste Regulations
- Legislation required regarding appropriate management of hazardous waste such as asbestos, fire-ant soil, clinical waste, drugs, poisons, confiscated foods etc.
- Where does Container Deposit Legislation come into consideration in this document?

### **LAWMAC responses to distribution of Collected Landfill Levy Funds**

- What guarantee does local government have that collected Levies will be fully utilized in the three Grant Funding Programs of the Draft Consultation?
- LAWMAC prefers that the Levy be calculated at a percentage proportionally allocation with distribution of Grant Funding increased as Levy Collection increases in accordance with CPI (guaranteed minimum plus a provision for increased portion to scale).
- Due to accounting ageing on collection of levy funds the first year is basically lost and calls for guarantees of any unspent established funds to be carried over into future grants.
- Grant funding should be restricted to Levy Collection Shires (and possibly Buffer Zones?).
- Whilst the Qld Govt Environmental Initiatives such as Koala Habitats are certainly commendable it is not acceptable by LAWMAC that approximately 27% of waste levy funding collected could be diverted to non-waste related projects.

- If the Environmental Initiative Grant is endorsed and operates as proposed in the draft document inclusion of North Qld-based environmental programs such as Cassowary Habitat and similar initiatives such as buy-back schemes should also be deemed eligible for consideration of funding.
- Could the first five years be prioritized and confined to environmental "Waste Related" projects only with a wider scope to other "Koala/Cassowary" type projects considered in later years?
- Is DERM considering multi-year funding to encourage local government to undertake new and initiatives/infrastructure with schedules over longer periods of time?
- What eligibility of funding is available for the development and implementation of revised Strategic Waste Management Plans particularly in relation to changes due to the introduction of the Waste Levy?
- Local Government Regional Projects should be given priority for funding – Regional Grants for Regional Solutions!
- Stakeholder Advisory Committee established to approve Grant Funding should be represented by Industry, Local Government and DERM (with participation by regional representatives eg SEQ, CQ, NQ etc) on both the Stakeholder Advisory Committee and the Technical Committees.