

**Timber Queensland Submission on the
Queensland's Waste Strategy 2010 - 2020**

- **Waste Avoidance and Recycling Consultation Draft**
- **Proposed Industry Waste Levy Consultation Draft**

**Timber Queensland Limited
P O Box 2014
Fortitude Valley Qld 4006
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Timber Queensland Limited (TQ) is the state industry body representing the interests of the full timber value chain; from forest growers, through timber processors, merchants, and importers, to fabricators, builders and associated building professionals, as well as timber recyclers and one bio-energy plant. Timber Queensland welcomes the opportunity to comment on Queensland's Waste Strategy 2010-2020.

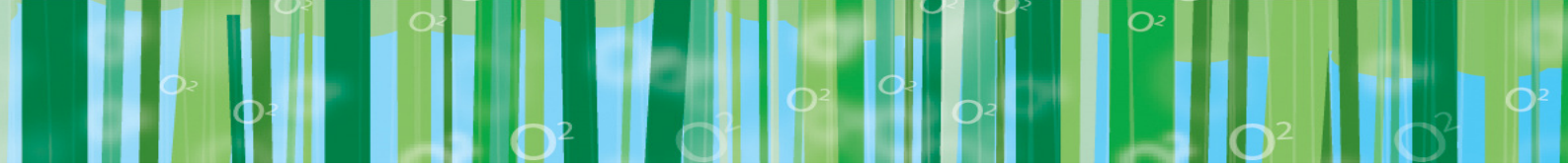
Timber Queensland made a submission on the Queensland Waste Strategy Discussion Paper in December 2007, and we are pleased to see that there has been some progress since then, including the draft Strategy and a commitment to implementing a Waste Levy.

Timber Queensland identified in our submission a range of options to reduce the disposal of wood waste to landfill, with development of suitable market mechanisms being fundamental to a sustainable improvement in waste reduction.

We commend the Strategy's commitment to achieving improved recovery and recycling levels for commercial and industrial (C&I) and construction and demolition (C&D) waste; to improving data on waste, including C&I and C&D waste; to establishing a grants program to support commercial waste recovery opportunities; and in particular, to working with peak timber industry organisations to improve timber and wood waste recycling and reduce unnecessary wastage and disposal.

Timber Queensland supported the introduction of a waste levy for landfills as an effective regulatory means of improving the level of recovery and recycling of wood waste in our 2007 submission. We recognise the difficulty of determining a relevant rate for Queensland, and those proposed appear to be reasonable in comparison to those applied in other states. However, we reiterate the need for collected levies to be used for improving waste management rather than going into consolidated revenue.

TQ notes that the proposed levies will be higher for 'lower hazard regulated waste', however notes that the term 'lower hazard' is not defined in detail. TQ is concerned for any potential inclusion of end-of-life C&D preservative treated timber in the definition of lower hazard regulated waste. Treated timber from this source, from a use and disposal perspective, is not a hazardous material and classification as such would be inappropriate.



Of course TQ recognises that some wastes generated during the application of some wood preserving chemicals may require further assessment to determine an appropriate waste hazard level.

It is anticipated that the introduction of the levy will impact on the C&D and C&I waste streams and Timber Queensland understands that DERM will be seeking to establish base-line data in order to monitor the effect of the waste levy over time.

Timber Queensland's 2007 submission noted the need for an inventory of timber within these waste streams as an essential first step to underpinning future business development opportunities. We would reiterate our concern that any inventory needs to be a detailed weight-based assessment in order to deliver accurate and differentiated information on the type and source of wood waste.

A clear understanding of the nature and source of the wood waste material is essential to assessing the feasibility of alternative uses, and Timber Queensland would be happy to be involved in developing an appropriate inventory.

Timber Queensland notes the proposal to implement a competitive grant program, and welcomes the recognition of recovery and use of particle board and low-value timber from mixed wastes as one of the possible priority funding areas. Immediate funding for the above inventory could be the first step in supporting the roll-out of competitive grants to support commercial recovery opportunities in the timber and wood products area.

The nature of a significant proportion of end-of-life timber - being short section with holes, low quality and physical contaminants such as nails, etc. - means that reuse and recycling in whole section or in chip form can be difficult. The utilisation for the generation of renewable energy is a clear opportunity for much of this wood unsuitable for reuse or recycling. Support for the establishment of further renewable energy facilities to complement Rocky Point Power, for instance on the north side of Brisbane, is essential.

Opportunities for small scale renewable energy plants should also be fully evaluated, and assistance with technical support, feasibility studies, and even capital could help to make such plants a reality. Efforts in this area must be fully integrated with other government agencies operating in this space, such as the Office of Climate Change, Office of Clean Energy and DEEDI.

Timber Queensland welcomes the opportunity comment on the draft Strategy, and looks forward to working with the Queensland Government to help improve timber and wood waste reuse and recycling, awareness and reduce unnecessary wastage and disposal.

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