

Our reference: 3831950
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ENTERED 09.08 DK



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

Dear Madam,

**Queensland's Waste Strategy 2010 – 2020
 Waste Avoidance and Recycling Consultation Draft**

I would like to provide for your further consideration the following submission from Toowoomba Regional Council in response to the "Queensland Waste Strategy 2010 – 2020 - Waste Avoidance and Recycling Consultation Draft".

Eight Councils amalgamated to form Toowoomba Regional Council (TRC) in 2008. TRC has since undertaken an extensive waste planning exercise with a view to achieving environmental compliance, improving and rationalising infrastructure, identifying service requirements and developing and costing strategies within a timeframe that is realistic, achievable and affordable for TRC and the community. Local Government Infrastructure Services (LGIS) and Aurecon Pty Ltd assisted TRC to prepare the Toowoomba Regional Council Waste Management Strategic Plan which was only recently adopted by Council in July 2010. TRC is now committed to implementing the plan and is intending to provide resources and funding in future budgets to achieve the strategies and timelines identified within the plan.

The plan methodically works through strategies for TRC to deal with some fairly complex issues over the next five years. These issues include options for expansion of the disposal areas within the Toowoomba Waste Management Centre, rationalisation of waste and recycling collection contracts and consolidation of the number of landfill sites. TRC currently has 39 operational waste disposal/transfer facilities as detailed in the table below.

	Manned Sites	Unmanned Sites	Total
Landfills	15	8	23
Transfer Stations	1	3	4
Skip Bin Sites	0	12	12
			39

Our Waste Management Strategic Plan recommends the rationalisation of Council's waste management facilities as follows:

	Manned Sites	Unmanned Sites	Total
Landfills	6		6
Transfer Stations	12		12
Satellite Transfer Stations		5	5
			23

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SERVICE CENTRES

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CROWS NEST
 25 Emu Creek Road
 Crows Nest Q 4355
 T 07 4698 1155

GOOMBUNGEE
 89 Mocatta Street
 Goombungee Q 4364
 T 07 4696 7900

GREENMOUNT
 54 Hodgson Street
 Greenmount Q 4359
 T 07 4697 0200

HIGHFIELDS
 O'Brien Road
 Highfields Q 4362
 T 07 4630 8925

MILLMERRAN
 2-16 Campbell Street
 Millmerran Q 4357
 T 07 4695 1399

OAKEY
 64 Campbell Street
 Oakey Q 4401
 T 07 4691 1388

PITTSWORTH
 85 Yandilla Street
 Pittsworth Q 4356
 T 07 4619 8000

TOOWOOMBA
 153 Herries Street or
 543 Ruthven Street
 Toowoomba Q 4350
 T 07 4688 6611

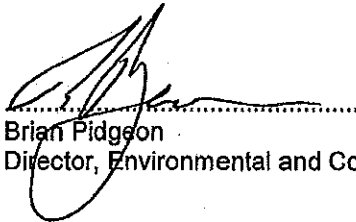
However there is no such natural boundary between TRC's primary disposal site at Bedford Street Toowoomba and other disposal sites within our region and contiguous regional council areas. The Bedford Street disposal site has infrastructure in place to allow the collection of the levy from 1 July 2011. We are very concerned that if all disposal facilities in TRC and contiguous regions are not simultaneously equipped to be able to collect disposal fees and the levy, it will be viable for refuse to be transported to facilities that can't yet collect the levy or are being planned to be shut down under our planned rationalisation of disposal facilities. These smaller rural disposal facilities are not licensed or equipped to accept larger waste volumes that would migrate to them under these circumstances.

We consider that our proposal for a 4 to 5 year moratorium on introducing the Industry Waste Levy west of the Great Dividing Range is a sensible and balanced interim strategy to resolve the likely impacts to our region and TRC, should an Industry Waste Levy be imposed by DERM.

I look forward to you genuinely considering our submission and demonstrating an understanding of the unacceptable implications to TRC and our community should the Industry Waste Levy be applied from 1 July 2011.

Should you require further clarification or wish to discuss our submission in more detail, could you please contact Mr Tony Shadwell, Manager Environmental Health Services on telephone (07) 4688 6831.

Yours faithfully



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Brian Pidgion
Director, Environmental and Community Services