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Project Manager

Natural Resources and Environment
Department of Environment and Resource Management
GPO Box 2454
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Dear Sir/Madam

**SUBJECT >> Waste Strategy 2010–2020 - Waste Avoidance and Recycling
Consultation Draft and the Proposed Industry Waste Levy Consultation Draft
Paper - Townsville City Council (Townsville Waste Services) submission**

In response to the above documents, Townsville City Council provides the following comment.

General Comments

Council has previously raised the issue of an updated State Waste Management Strategy in several forums and is pleased to see the Queensland Government take measures to bring Queensland into line with other states.

Some components of the proposed draft concern council but in general terms the movement towards a culture of waste minimisation, recovery and recycling is supported by Townsville City Council.

Specific Questions in the Consultation Draft

Q1. (Page 30) Do you think these targets are an appropriate measure for waste avoidance and can you suggest other targets or measures for waste avoidance?

The targets are appropriate. Further opportunities to shape the manufacturing and importing sectors need to be examined with a view of reducing waste generation. It may be appropriate to have a target specifically developed for these sectors or component industries within the sectors.

Q2. (Page 32) Do you think the recycling targets are appropriate? Do you think there should be targets for other specific streams (e.g. for green waste)?

The targets are can only be achieved if the complete environment exists for recycling to occur. The great gap in recycling for North Queensland is regionally based processing facilities and regional markets for recycled product.

The target for diversion of regulated waste seems low considering their potential environmental impact (only 15% compared with 60-75% for other streams). This target should be adjusted dependant on the success of programs designed to reduce or reuse these waste streams.

Regional recycling issues need to be addressed in a state context. Raising community expectations with programs/targets which are only environmentally or economically sustainable in the concentrated populated areas of South East Queensland does not assist local government in outlying regions.

If the recycling targets are to be met, the Queensland Government needs to:

- develop/sponsor a state packaged Alternative Waste Technologies (AWT) which can be rolled out to regional areas to provide local solutions to waste;
- provide flexible legislation, policies and procedures which can be adopted in smaller communities e.g. in Queensland recycled concrete cannot be used in road construction or reprocessed concrete because it is not included in the government specifications for road construction;
- develop of a state culture against unnecessary consumption by educating the community of the affects of consumption on the triple bottom line (bottled water, fuel, electricity, packaging);
- develop extended producer responsibility schemes mandating producer responsibility for the 'end of life' of recyclable products and/or setting maximum limits for the inclusion of hazardous components during manufacture;
- provide financial incentives to encourage D4E measures targeted at the commercial and industrial sector;
- continue to implement state purchasing policies which include a wider range of recycled product or recycled fractions.

Q3. (Page 33) Do you think we should have a reduction target for litter and illegal dumping and if so what should this target be? Should we have a landfill diversion target and if so, can you suggest an appropriate diversion target?

A landfill diversion target is not considered necessary. The targets articulated on page nineteen of the draft will reduce landfill disposal if successfully implemented. If landfill targets are introduced they would need to be on an aggregated state wide basis and should not be used to benchmark specific landfills or regions.

Additional Comments

Application of levy charges on local government waste streams.

Council notes the intent to apply the levy to waste produced in council's operations (other than public litter bins etc). Analysis indicates that this will add approximately \$270,000 to council's operating costs in the next financial year.

Council considers that waste from council's operations is for the benefit of ratepayers particularly waste from the construction or demolition of community infrastructure. Council considers that all waste from council's operations should be exempt from the waste levy apart from waste product for commercial activities undertaken by council.

Waste levies should not be due on waste subject to a 'bad debt'.

Council is of the opinion that bad debts in respect to a waste levy should become a debt of the state and not local government.

The waste levy has the potential to significantly reduce landfill revenue as alternative waste disposal options are implemented by generators.

Consideration needs to be given to landfill operators that have planned, resourced and provided landfill facilities based on historic income streams. If the waste strategy achieves the listed targets landfill quantities would be halved over the next ten years with a consequential loss of revenue. It is considered that there should be some staged "cushioning" of these revenue drops to allow operators to adjust service levels, close landfills, and implement other income generating strategies. It is considered that the Queensland Government should guarantee 2010 revenue streams for landfill operators for a period of five years to enable enough time to effect adjustments.

The annual cost of state licensing for waste disposal should be paid for out of the waste levy and existing charges levied on landfill operators should be cancelled.

Council considers that the annual licence fees paid to the Queensland Government for the administration of landfill licensing and the like should be funded by the waste levy.

The waste levy should help to fund inequities for the transport of recyclables from regional centres to the south east corner for processing.

The draft policy promotes recycling in lieu of disposal and sets up a cost regime that discourages disposal through an economic instrument. If the policy is to provide some equity for regional Queensland consideration needs to be given to equalising transport costs throughout the state.

The waste levy should be clearly noted on invoices (in order to convey the extent of the levy to the waste generator).

The cost of the levy needs to be apparent to the generator. It should also be clearly marked as a state levy.

The waste levy should not be utilised to fund landfill infrastructure (in order that early initiators are not disadvantaged).

Funds from the levy should be used to fund compliance, education, the creation of markets and programs/infrastructure designed to reduce materials going to landfill for disposal.

The waste levy should be utilised to fund a regional or state hazardous waste facility (defined classes of both solid and liquid classes).

The involvement of the private sector in all of these types of facilities would be dependant on private sector interest and relevance. In the absence of a private sector solution or a private sector partnership, state government should fill the void for these waste classes.

The application of the waste levy to commercial waste only causes significant difficulties for assessment of vehicles carrying commercial and domestic waste in mixed loads.

Waste transporters will either need to weigh commercial loads at the point of pickup or charge an estimated levy amount for commercial clients when they collect wheelie bins or front lift bins. If an estimated fee is charged, there is no incentive for a commercial generator to reduce waste (they will pay a set fee regardless of how much is in the bin). The differential will be retained by the transporters who will only

be liable for the exact weight at the landfill. Estimating the quantity of commercial vs. residential waste in a compactor truck will be a guess at best and will provide another mechanism for the levy to be retained by the waste transporters.

The arbitrary limit of 10,000 tonnes of waste per annum to qualify for a weighbridge facility needs to be reviewed.

Council is currently designing a waste transfer station for Magnetic Island. The original concepts did not include a weighbridge but the need to accurately assess commercial loads at the transfer station may necessitate a weighbridge. This additional expenditure should be paid for by the state regardless of whether the site takes 10,000 tonnes or not.

Council is also somewhat concerned that the funding allocated to weighbridges is inadequate and the time frames for installation and commissioning before 1 July 2011 are too short. This will become apparent when the designs and contracts for the provision of this infrastructure are completed.

Inert waste from Material Recycling Facilities (MRFs) for kerbside collection services should be dealt with as Municipal Solid Waste (MSW)

Commercial recyclables need to be separately assessed by MRF operators and the levied applied. Waste from the kerbside collection is MSW and should be treated as such.

Levy amounts collected by landfill operators should be remitted to the Queensland Government on a quarterly basis.

Council considers the basis of this arrangement would be that only levy funds collected would be remitted. Remittances should be net of administration fees as agreed by the Queensland Government and the landfill operator.

Applications for multi year funding should be considered as part of the WARE funding to encourage new initiatives and/or infrastructure.

Some initiatives will require works to be completed over more than one year. The ability to apply for multi year funding is considered essential to guarantee projects.

A clear definition of waste needs to be included in legislative updates.

Council sees some difficulties in administering levy requirement particularly in relation to high and low hazard wastes unless clear definitions are included in the proposed legislative updates.

Illegal land filling must be rapidly investigated and dealt with.

There is likely to be a growth in illegal landfills and disposal sites. The response to these activities needs to occur quickly on a co-operative basis between local government and the State.

Stakeholder Advisory Committee for Grants allocation.

Council considers that a Stakeholder Advisory Committee should be established to approve grant funding. Membership should be drawn from representatives of industry, local government and the Department of Environment and Resource Management. Regional representatives from Waste Management groups (e.g. Local Authority Waste Management Advisory Committee - LAWMAC) should also be invited.

Container Deposit Levy (CDL).

Council notes the interest in CDL schemes on a national basis and is interested to see how this issue is to be included in the Queensland strategy.

Grant funding to increase as Levy increases

Council considers that funds allocated towards grants should increase in the same proportion as the forecast increase in the waste levy. There should be a guaranteed minimum available for funding plus a provision for increases as they are applied to the levy.

Regional projects should be given priority for grant funding.

Council considers that regional projects considered for funding funds should be allocated a priority.

Beneficial re-use of landfill materials

Council considers that material entering a landfill which can be put to beneficial use on site should be exempt levy charges. A good example is acid sulphate soil which (after treatment) is used as a cover material.

Yours sincerely



Ray Burton

Chief Executive Officer