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Dear Sir/Madam,

Thank you for the opportunity to comment on the Queensland's Waste Strategy 2010-2020: Waste Avoidance and Recycling Consultation Draft (referred to as Waste Strategy). Given the industry's involvement in construction and demolition (C&D) waste and the Institute's EnviroDevelopment initiative, this is an issue of interest to the Urban Development Institute of Australia – Queensland (UDIA).

As you may be aware UDIA has been very proactive in regards to encouraging developers to enhance sustainability and to reduce construction and demolition waste. This has been through responsible policy positions, profiling best practice champions and relevant innovations and in recent years particularly through EnviroDevelopment.

The EnviroDevelopment framework is designed to provide certification and incentive to developers where developments are achieving strong sustainability outcomes. It specifically recognises developers who have reduced waste in the land clearing and demolition phases as well as construction and to some extent, post construction phases. Indeed there is a whole Element of the framework dedicated to Waste with the objective of reducing waste sent to landfill and encouraging more efficient use of resources. To achieve the EnviroDevelopment Waste Element requires a minimum of 40% of the land clearing or demolition waste to be recycled or reused on site as well as measures to minimise the amount of soil or vegetative debris going to landfill. It also requires achievement of construction strategies to minimise waste such as the use of waste-recycling contractors, separating recyclable materials, designing developments to use standard sizes to reduce off cuts, reducing materials packaging and using skip bins rather than cages. It also requires the development to be constructed to facilitate recycling during the occupancy phase.

The EnviroDevelopment Element dedicated to Materials also encourages material reuse and the use of materials with recycled content and thereby also encourages waste reduction. There are also elements dedicated to Ecosystems, Water, Community and Energy. Further details can be found at www.envirodevelopment.com.au EnviroDevelopment has already demonstrated through the certification of twenty two projects (representing nearly 21,000 lots / units and 9,200m² of industrial space) that it is a successful change agent within the development industry and this is expected to continue as awareness of the EnviroDevelopment brand increases in the marketplace.

The Institute believes that the objectives of the Waste Strategy are very much aligned with those outlined in EnviroDevelopment, particularly in the waste and materials elements. A partnership between the Department and EnviroDevelopment would offer a mechanism to encourage, educate, monitor, reward and ensure that the objectives of the Waste Strategy are being achieved on the ground. EnviroDevelopment's success to date has primarily evolved through the creation of a comprehensive, clear and practical goal, usually put in place at the commencement of a project and as early as site acquisition. The clear goal of EnviroDevelopment certification unites project teams, involving various disciplines and extends to builders working on site. As the Department would be aware, waste avoidance and minimisation also requires the support of builders on site, and EnviroDevelopment has been able to achieve results through a more united partnership between builders, developers and sub-contractors working on site. EnviroDevelopment's influence also extends to recycling in the post-construction and occupancy stage, where developers are required to provide compost facilities (either per lot or a communal facility) or ensure that there are mechanisms in place to encourage green waste reuse.

It is the Institute's belief that EnviroDevelopment is and can continue to assist in capacity building amongst the construction and demolition sector to develop and deliver a waste avoidance and resource recovery awareness program and to raise awareness of actions to encourage waste recovery and reuse. To some extent, EnviroDevelopment is already assisting with some of the actions outlined in the program plan, specifically those listed under the commercial and industrial sector and construction and demolition sector.

With the Institute's work to improve waste recycling and reuse outcomes, the principal hindrance regularly brought to our attention by developers is that it can be very difficult to recycle materials in many locations where there are neither the facilities nor the demand for the recycled product. It would seem that there is an urgent need to develop more waste recycling 'infrastructure' so that C&D waste along the coast and in regional centres can be readily recycled. It can be frustrating for developers, builders and contractors who want to recycle and go to the effort to separate recyclables only to find that the separated waste streams all end up in land fill in particular locations. The Institute believes that the expansion of recycling facilities in regional locations, outside South-East Queensland is pivotal to the successful minimisation of waste generation. In this regard, the waste levy will be largely unsuccessful as a price signal to change disposal behaviour in areas where recycling facilities are inadequate or non-existent.

Ideally recycling in some instances, such as outlined above, would be achieved through increasing the demand for recycled products sufficiently so that businesses develop to tap into this resource and manufacture it into saleable products, whether this is by transporting it to a centralised manufacturing plant or duplication of manufacturing plants, depending on transportation costs, capital costs of recycling plants and market demand for final products. Of course these costs, as well as energy input and other environmental costs are also relevant when considering the merits of recycling particular materials generally and in particular locations. This may mean that in some remote locations it will remain not economically viable to recycle particular materials for a period into the future. However as demand increases for recycled products and technology increases (both in regards to recycling methods and product innovation), a greater portion of the waste will be recycled. This may require an injection of public funds into worthy research and development or start-up projects in particular locations to achieve this outcome. Further work in EnviroDevelopment can also assist to drive further innovation in this sector.

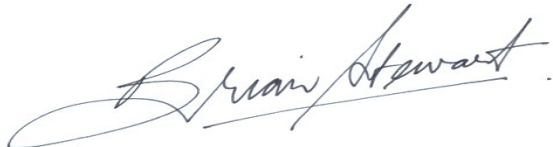
The Institute was particularly pleased to note under action 20 that an online resource exchange register was proposed as a program action, however notes that it was listed under the commercial and industrial sector heading. This online database will also be important for residential developers and builders and it is recommended that it is expanded to also include

residential uses. Given the Institute's experience, an online resource exchange registry is of paramount importance to achieving the desired outcomes of the strategy. Several of our certified EnviroDevelopments have employed resource exchange measures to great success, however for the wider audience, an online database would make resource exchange a more viable, practical and less time consuming exercise. However, it should be noted that the timing of delivery of this register is paramount and it is suggested that this action be implemented prior to the introduction of the levy. This will facilitate and encourage the propagation of new industries involved in the recovery and reuse of C & D waste and divert a significant volume of waste from landfill.

Again, thank you for the opportunity to comment on this issue. The UDIA trusts our emphasis on incentives for waste improvement, encouragement for additional recycling facilities and expansion of resource exchange facilities is actioned in our general support for the policy. The Institute looks forward to discussing the Waste Strategy and links with EnviroDevelopment with the Department in the coming months. Please do not hesitate to contact myself or Kirsty Chessher (EnviroDevelopment Manager kchessher@udiaqld.com.au or 07 3229 1589) if you wish to discuss this matter further.

Yours sincerely

Urban Development Institute of Australia (Queensland)

A handwritten signature in black ink that reads "Brian Stewart". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Brian Stewart
Chief Executive and General Counsel