

20 August 2010

Tamara O'Shea  
Executive Director - Waste Reform  
Natural Resources & Environment  
Department of Environment and Resource Management  
Level 10, 40 George Street  
Brisbane Qld 4001

**Queensland Waste Management Strategy Response**

Dear Tamara,

WMAA Queensland would like to take this opportunity to thank DERM for the opportunity to provide a response on the recently released Queensland's Waste Strategy 2010-2020 (referred to as the Strategy) and its supporting documents.

As you are aware, in order to obtain feedback from its membership on the Strategy, WMAA commissioned a series of workshops, as follows:

- Brisbane - 2<sup>nd</sup> July
- Rockhampton - 6th July and
- Gladstone - 15th July.

In addition, we have also invited members to provide comments directly to WMAA (which have been incorporated into this submission)

WMAA Queensland firstly congratulates DERM on developing a State wide Strategy and considers the commencement of this process to be very encouraging for the future of the industry. WMAA is keen to have an active involvement in the development of the Strategy to the greatest extent practicable.

In relation to general feedback from our membership, WMAA offers the following comments/key issues for consideration:

**1. Exclusion of MSW from the Levy** - There is high degree of polarization in relation to this issue and it is unlikely that WMAA would be able to provide a consensus view. There is however, high degree of concern from almost all sectors of WMAA regarding the practical application of this exclusion, particularly in relation to mixed loads (commercial and residential) and the process that will need to be developed to support effective implementation.

**2. Timing for the introduction of the Levy** - There is general member consensus that there needs to be an extension of time in relation to the actual implementation of the levy, by around six to nine months. This extension of time would greatly assist industry to prepare as well as providing the opportunity to better define Levy mechanics and the ultimate distribution of Levy funds.

**3. Definitions** - There is strong member support for the development of clear definitions for both legislation and the final Strategy document.

**4. Data** - WMAA members support the development of uniform methodology that aligns with the National Waste Strategy and limits the duplication of information collected for various Government agencies. There is concern about the protection of commercially sensitive information and members consider that any system that is implemented must be auditable and electronically verifiable.

**5. Targets** - There remains a divergence of opinion in relation to the introduction of mandatory targets, particularly given the current lack of reliable and verifiable data. Members consider that there should be sufficient flexibility to modify targets, to reflect the anticipated improvement in data quality over time.

**6. Governance** - WMAA considers that levy funding must be transparently governed with clear and transparent processes for its distribution.

Additional comments and/or concerns from members include the following:

- The final strategy should include incentives for collaboration between the private sector and local government.
- The Strategy at this time appears limited in terms of incentives for waste avoidance.
- There should be links between Development Applications and the proposed Strategic Waste Management Plans.
- The Strategy and associated action items should be focused on increasing the yield of recyclables, and quality of such materials; and
- There should be supporting incentives for the use of recovered materials/sustainable procurement, including:
  - Incorporation of recycled content target for government procurement - including infrastructure programs; and
  - The use of recycled content as a criterion for levy funding (where appropriate)

More specific and/or detailed WMAA member feedback can be found in the attached report prepared on behalf of WMAA.

Yours sincerely



Pravin Menon  
WMAA (Qld)



Waste Management Association of Australia

## Queensland Waste Strategy 2010-2020

### Consultation Workshops

July 2010



**CONSULTING GROUP**



ENVIRONMENTAL



ENGINEERING

## Queensland Waste Strategy 2010-2020- Consultation Workshops

---

### Document History and Status

Issue	Revision	Issued to	Qty	Date	Reviewed by
1	First Draft		1	19 July 2010	P Brown
2	Final			21 July 2010	P Brown

Project Manager: Patrice Brown  
Name of Organisation: WMAA  
Client: WMAA  
Client Project Manager: Val Southam  
Name of Project: Workshops Draft Waste Strategy Consultation Paper



Patrice Brown (Director)  
Phone: 0749229252 | Fax: 0749220195 | Mob: 0419760411  
Level 1, 21 East St  
Rockhampton, QLD, 4700  
PO Box 8384, Allenstown, QLD, 4700

### Limitations of this Report

The conclusions presented in this report are based upon comments and feedback provided by attendees at workshops facilitated by CQ Environmental.

The scope of this report may not be appropriate to satisfy the needs of other users and any use or re-use of this document or the findings, conclusions or recommendations presented therein is at the risk of any other user. If this report is used by parties the logos must be removed.

## Queensland Waste Strategy 2010-2020– Consultation Workshops

---

### Table of Contents

Limitations of this Report.....	iii
Table of Contents.....	iv
Glossary.....	v
1. Executive Summary .....	1
2. Feedback from Workshops .....	2
2.1 Waste Strategy.....	3
2.2 Waste data .....	4
2.3 Recycling targets.....	5
2.4 Levies.....	6
2.5 Actions.....	7
2.6 Implementation and governance .....	8
3. Conclusions.....	9
Appendix A – Workshops Spreadsheet .....	10

Glossary

<b>TERM</b>	<b>DEFINITION</b>
<b>C&amp;D</b>	Construction and Demolition Waste
<b>C&amp;I</b>	Commercial and Industrial Waste
<b>DERM</b>	Department of Environment and Resource Management (Queensland)
<b>ERA</b>	Environmentally relevant activity
<b>NPI</b>	National Pollutant Inventory
<b>MSW</b>	Municipal Solid Waste
<b>WARE</b>	Waste Avoidance and Resource Efficiency
<b>WMAA</b>	Waste Management Association of Australia

### 1. Executive Summary

Queensland's current waste management strategy was released in 1996. The state's Waste Strategy 2010-2020 Waste Avoidance and Recycling Consultation Draft was released in June 2010 for public comment.

The new strategy seeks to undertake "genuine integrated reform across all aspects – strategic, legislative and economic - of waste management and resource recovery" across the State.

When finalised, the strategy will provide the primary framework for State and Local Government agencies, business, industry and the community in waste avoidance and recovery practices over the next decade. Input into the draft strategy from interested stakeholders is therefore vital to ensuring the Strategy is workable and the targets set realistic and achievable.

Established in 1991, the Waste Management Association of Australia (WMAA) is Australia's peak association for waste management professionals. CQ Environmental was engaged by WMAA to conduct a number of consultation workshops across Queensland to seek input from WMAA members and other interested parties in order to prepare a submission to the Queensland Government on the new strategy.

Workshops were held in Brisbane on 2 July, Rockhampton on 6 and 14 July, and in Gladstone on 13 July 2010, and were facilitated by CQ Environmental Director, Patrice Brown. All workshops were well attended by interested persons from Local Government, waste management service providers, environmental consultancies, and major industry.

Some of the key points raised by workshop attendees were:

- Waste data terminology and capture needs to be sorted and streamlined prior to any roll out of legislation;
- Incentives for recycling and waste avoidance are a must;
- Targets should not be mandated in the short to medium term;
- Policing of the implementation will be a challenge;
- Risk of consumption of majority of levy collection back into administration;
- Consideration should be given to the inclusion of municipal solid waste in the levy structure;
- Local governments should be compensated for their time and resources implementing the levy collection;
- Permitting systems for new recycling plants should be fast-tracked to encourage investment;
- Mining should be involved in the program to encourage waste avoidance;
- Regional areas need to receive a fair share of the funding due to challenges with distances to recycling facilities and to encourage establishment of recycling facilities;
- Mixed loads will be difficult to monitor and levy;
- Unmanned stations will need to be closed or significantly upgraded to avoid illegal dumping; and
- All WARE funds should be directed back only into waste related projects.

## 2.1 Waste Strategy

There was consensus amongst workshop attendees that a new Queensland Waste Strategy was long overdue. Attendees agreed there was a need for an updated and overhauled strategy to establish a modern and contemporary framework for the way in which waste and resources are managed in Queensland over the next decade.

While the draft strategy was welcomed, some attendees stated it needed to be better defined to maximise its intent. Many attendees called for further clarity and consistency (of an industry and national standard) with regard to definitions and terminologies.

- ✓ Concerns were raised about the strategy timeframe with some attendees suggesting it is too ambitious while others advised the timing of its introduction will prove problematic for councils in light of their current budget cycles.
- \* A key recommendation arising from the workshops was the need for a uniform data collection process and methodology, including standardised reporting/waste tracking systems, templates and guidelines. Attendees considered these to be essential requirements if the waste strategy is to succeed.

Other areas highlighted by attendees with regard to the implementation of the strategy included resourcing (funding for infrastructure, training, etc.), policing, and incentives.

From a regional perspective, there is widespread concern that larger councils will benefit from big financial returns from the levy while smaller councils will struggle to meet targets with limited resources. There is a need to consider regional planning requirements and impacts. This is particularly relevant with respect to waste aggregation and economies of scale.

- ✗ Fears were raised at the workshops that the strategy provides no clear incentives for collaboration between industry and Local Government. Attendees believe that incentives will assist in driving continuous improvement with respect to waste management. However, without incentives, some industries/businesses may be willing to accept the levy as simply another cost or risk they are willing to absorb.

Incentives to encourage avoidance or recycling are therefore seen as vital to encourage the adoption of strategies and a collaborative approach to waste management.

Attendees questioned who will administer the funding and how it would be administered. They asked what consideration had been given to offsetting the costs to be borne by councils in the levy collection and also queried what funding is to be provided for compliance, including increased "policing" of illegal activities?

- ✓ Education is seen as the key to driving the success of the strategy with calls for a statewide promotional campaign. The issue of education accountability i.e. who educates who was raised with industry representatives stressing education cannot be and should not be left to industry. It was suggested that a similar competition to the "Tidy Towns", such as "Waste Avoidance Towns", could prove beneficial in encouraging community waste awareness.

*Data reliability 12 months would help. 1 Jan.*

## 2. Feedback from Workshops

Each workshop consisted of a DERM prepared overview of the proposed Waste Strategy followed by a presentation by Patrice Brown which focussed on the key issues of the strategy and encouraged participant involvement. DERM officers presented at the Brisbane workshop and the first Rockhampton workshop. After presentation of the slides Patrice facilitated group discussions which encouraged the attendees to provide feedback and input on the following six key areas:

- Waste Strategy;
- Waste Data;
- Recycling Targets;
- Levies;
- Actions; and
- Implementation and Governance.

Following is a summary of the main points raised by workshop attendees within these key areas.

Comments from all workshops have been compiled and entered into a spreadsheet included as **Appendix A**.

## 2.2 Waste data

Key issues raised by workshop attendees were the need for clarity and consistency in waste data terminology and the need to sort out how waste data is to be captured well before levies are introduced.



The need for relevant legislation and regulations must have clear and consistent definitions and terminology (e.g. standard measures for weights, volumes, units, density equivalents, volumetric conversions) is seen as crucial to the success of the new strategy. Queensland definitions must be in line with and reflect industry definitions and consideration should also be given to national consistency.

There needs to be consistent representation of data with attendees suggesting this will only be achieved with the introduction of a common database and standard reporting templates. Attendees highlighted the need for a link between Development Applications (DA) and reporting requirements (i.e. Waste Management Plans) with a DA listing the prescribed information required.

The suggestion was raised that National and State reporting systems should be streamlined (e.g. adoption of similar systems to NPI or ERA to improve waste reporting requirements).

Clarification on the issue of how the waste data is to be captured is required. Historically, waste data has been collected from landfills. Workshop attendees questioned how data will be collected in the future and who will need to report (generator or transporter). Concerns were raised with regard to the distinction of leviable waste in mixed loads. Some councils collect municipal solid waste (MSW) and commercial waste in the same truck. How will the load be split? Has the possibility of the dilution of high hazardous waste to low hazardous waste criteria been considered?

- ✶ The need for strict confidentiality with respect to waste data collection was raised. Some attendees advised that data collection methodology would need to change as industry will not want to expose collection data to competitors. Other attendees suggested the need for publicly available information to be collected in an accountable database. This would enable regular feedback to industry showing statistics relating to data supplied, justifying the benefit of waste data collection, particularly given the cost involved. ✓

### 2.3 Recycling targets

The new Strategy sets out a number of clear targets in terms of recovery and recycling of waste in Queensland as well as specified targets to reduce climate change impacts of waste disposal.

Workshop discussions as to whether these defined targets and milestones are realistic and achievable raised a number of concerns including who will monitor the targets and confirm whether they are being met, the need to identify measurement systems, whether targets should be mandatory, and the need for incentives.

Some attendees agreed the proposed targets are realistic and achievable provided there are the means and regional facilities to recycle the various waste streams. Other attendees expressed concern that the way in which the targets will be measured has not been clearly defined i.e. waste data targets 35% of what - regionalised waste?

Attendees highlighted concerns regarding whether targets will be adjustable for generation volumes and regions suggesting that single targets cannot be made to fit across the state because of variations including greater volumes in some areas, volume changes due to construction peaks, etc. It was suggested that stream specific targets may be more manageable and meaningful. The idea of a sliding scale for smaller operators (e.g. may be a yearly plan to submit and average monthly payment calculated as a result of that plan) was also raised.

Attendees also called for targets for reduction of landfill diversion and illegal dumping (and jail terms) and there was general consensus that MSW should be included in the targets.

On the issue of whether targets should be mandated, most attendees recommended that targets should not be mandated at this point; however, mandating at a later date could be considered if required. Others suggested regular reviewing of targets rather than mandating. Some attendees called for mandating targets because they believed voluntary targets did not work. A number of attendees who supported the idea of mandating did so on the proviso that the set targets be reviewed at a future date. Several attendees pointed out that as technology improves, we could run the risk of going past targets. Therefore, if targets are mandated, there would no longer be incentives for businesses to improve their operations and some businesses could become complacent. One attendee made the valid point that mandatory recycling targets may be too soon when we need to achieve reporting targets first.

✓ Many attendees indicated they would prefer to see the application of incentives for meeting recycling targets, suggesting there are many possibilities for encouraging more recycling e.g. incentives for meat works for recycling paunch for compost or briquetting. They suggested that perhaps consideration could be given to lower mandatory targets with higher incentive based targets.

✓ On the issue of private landfill operators, attendees agreed that they should have to report irrespective of whether they pay levies or not. If they don't report, the Government will be unable to get a true picture of waste data in the state.

Once again, workshop attendees considered education and "real" community consultation an important component in ensuring the success of the strategy.

## 2.4 Levies

A key component of the new strategy is the industry waste levy which the Queensland Government proposes to introduce from 1 July 2011.

*Done staying\* from ending* Most attendees agreed that the levies are an integral component in driving change with respect to waste management but suggested incentives for recycling could be more effective in bringing about long term change.

? Several attendees highlighted the fact that some businesses will see the levies as an expense they are willing to pay because they do not see waste management as part of their core business. They will be prepared to accept the levy cost because they have no desire or incentive to reduce their waste outcomes. There is therefore a need to reward those businesses who chose to "do the right thing".

While there were some questions raised in terms of how the Government confirmed the amount of levy to be charged, there was general consensus amongst workshop attendees that the levies were reasonable and appropriate and that enforcements were required to ensure compliance.

Once again, the issue of clarity and consistency in terms of definitions was raised e.g. who is caught up in "commercial" area, exemptions, etc.

With respect to levy exemptions, there was general agreement with regard to the suggested exemptions flagged in the levy paper (e.g. asbestos, charities, disasters, orphaned materials); however, there was also strong agreement that both green waste and MSW should be included in the categories being levied. Questions were raised with regard to whether applications for exemptions need to be made in advance or can be retrospective e.g. council collecting illegally dumped material – don't know how much material is to be collected until it has been collected. ?

Attendees called for clear governance in terms of the WARE Program with funded projects to be linked to defined criteria which can be monitored and audited. Attendees also stressed the need for a level playing field in terms of access to funding for both industry and local government. ✓

It was suggested that there be transparency in terms of how and where monies raised from the levy are spent. Concerns were expressed that too much will be taken up by DERM in administration costs when there is a need for funds to go back to Local Government and industry to help meet the costs of change/innovation required in administering the levy. There were calls for incentives for regional collaboration involving industry, government and community e.g. for establishment of regional waste management facilities. ✓

Attendees again raised the need for education at all levels. Attendees suggested that consumers needed to be educated on the costs associated with non-compliance and small industries need to be educated about cost savings so they have an incentive to separate waste.

## 2.5 Actions

The draft Waste Strategy outlines 26 actions which underpin the Strategy and are designed to empower and drive the Strategy forward over the next ten decades.

Most workshop attendees acknowledged the need for specific actions; however, some suggested the data used as the premise for some of these actions was questionable.

Attendees called for the actions to be aligned with priorities and common goals, e.g. actions need to promote and support collection services to enable business recyclable collection - there is no point in educating residents to sort their waste if there is no one to collect it. When deciding on priorities, there is a need to consider issues associated with different waste streams, such as environmental impact, landfill space consumed, which materials present the greatest opportunities.

Attendees advised that the actions need to have a stipulated lifespan and that this is an area which could be overseen by an independent Advisory Committee. They also indicated it was important that the actions are cognisant of the *Local Government Act* and *Sustainable Planning Act*.

The need to build capacity within the regions with continuity of service was also raised as a key factor especially when working with Government. This could be achieved by developing stronger links with local universities across the State to fund research (i.e. funding for scholarships).

The need for broad based education was again highlighted with attendees suggesting actions be aligned with appropriate education. They supported the need for increased waste avoidance education and the development of a statewide education awareness program and appropriate branding, including slogans.

There was also support for incentives for householders and smaller businesses to investigate alternative waste treatment or resource recovery. Incentives for improvements at home will create a push for similar attitudes in the workplace.

### Workshop attendee comments re specific actions:

Action 1 – *Toward a resource efficient government* - should focus on C&D sector and feed into Local Government.

Action 7 – *Alternative waste treatment technology* - should be cognisant that levy's exclusion of MSW means it won't encourage AWT for this stream.

Action 8 – *Orphan and historical waste removal* – suggest extension to "orphan landfills".

Action item 17 – *Target 150* – education is the key to achieving.

Action item 20 – *Online resource exchange register* – this has been tried before but was not successful.

## 2.6 Implementation and governance

One of the key areas of concern highlighted across the four workshops was the issue of timing and governance associated with the implementation of the new legislation.

Local Government and industry attendees expressed concern that it will be difficult to have required infrastructure in place (e.g. weigh bridges, new software, new staff, personnel training) in time for 1 July 2011 deadline.

Local Government representatives highlighted the fact that councils have already handed down 2010-2011 budgets and will therefore require extra funding for implementation of relevant infrastructure and training. It will cost councils resources and time to decide on how to accurately capture data and collect the levy and to provide supporting (auditable) documentation to meet monitoring and regulation requirements.

In terms of funding provisions, most attendees were adamant about the need for levy funds particularly in the early stages of introduction to come back into waste projects to achieve the desired targets (e.g. funds need to be returned to Local Government and industry for infrastructure, training, etc. required to meet targets). Attendees stated it was important to link funded projects to clear criteria to ensure fund recipients were required to report on the success of their programs.

Industry attendees highlighted the need to ensure a level playing field with regard to the distribution of WARE funds to ensure funds are not simply directed to Local Government. Local Government representatives were concerned that the majority of funding could be directed to bigger councils in the south-east with regional councils missing out.

The question of unmanned sites was a key area of debate in the regional workshops. Local Government attendees pointed out that, within the Central Queensland region, it is estimated that a large percentage of council waste disposal sites are unmanned. The introduction of levies could well encourage a culture of dumping at these sites. Attendees advised that the introduction of levies will therefore mean that unmanned sites can no longer exist. All sites will need to have charges levied. Councils may need to rationalise the number of unmanned sites within their boundaries. Remaining sites would then need to be staffed, perhaps on dedicated days for dedicated times. Even with restricted opening hours, this could place additional financial liability on Local Governments.

V/ An interesting point raised was the call for permitting systems for new recycling plants to be fast-tracked to encourage investment. Attendees agreed that the licensing requirements take so long to resolve that industry can lose interest in a project.

One of the recurring themes voiced by attendees throughout the workshops was the need for education. Broad based statewide community education is seen as the key to ensuring the success of the new waste strategy. Attendees suggested the strategy was unlikely to pay dividends in the long term if there is no culture to encourage "doing the right thing". One workshop group suggested the need for education programs to foster the culture of *Ownership, Accountability, Responsibility*. Attendees agreed there needs to be investment in waste management education at both the business and community level to enable the strategy to work. Councils also need to be thoroughly across the legislation if they are expected to administer the strategy.

Questions of how the strategy will be regulated and monitored and the cost of policing (e.g. for illegal dumping) were also raised and attendees questioned.

### 3. Conclusions

The workshops facilitated by CQ Environmental resulted in enormous interest in the strategy with 42 people attending the Brisbane workshop held 2 July, 20 in total at the two Rockhampton workshops held 6 and 14 July, and 25 attendees at the Gladstone workshop held on 13 July.



Attendees expressed their appreciation for the opportunity to participate in the formulation of Queensland's new Waste Strategy policy and welcomed DERM's commitment to personally respond to queries and submissions arising from the public consultation process.

Attendees recognised that a new waste strategy for Queensland is long overdue and while they acknowledged fears about the timing of the new legislation and appropriate resourcing for councils and industry, they are committed to working cooperatively to achieve long term sustainable outcomes in the area of waste management and waste avoidance for their local communities.

Appendix A – Workshops Spreadsheet



**WMAA /DERM Qid Waste Management Strategy Consultation Workshops**

Workshop	Workshop Date	Meeting Topics	Notes	Actions	Implementation & Streetbank
Workshop 1 Monday 1st July Dedicated to the development of the strategy	1st July 2019	Workshop 1: Initial discussion on the strategy and the role of the waste management authority.	Workshop 1: Initial discussion on the strategy and the role of the waste management authority.	Workshop 1: Initial discussion on the strategy and the role of the waste management authority.	Workshop 1: Initial discussion on the strategy and the role of the waste management authority.
Workshop 2 Tuesday 2nd July Development of the strategy	2nd July 2019	Workshop 2: Development of the strategy and the role of the waste management authority.	Workshop 2: Development of the strategy and the role of the waste management authority.	Workshop 2: Development of the strategy and the role of the waste management authority.	Workshop 2: Development of the strategy and the role of the waste management authority.
Workshop 3 Wednesday 3rd July Review of the strategy	3rd July 2019	Workshop 3: Review of the strategy and the role of the waste management authority.	Workshop 3: Review of the strategy and the role of the waste management authority.	Workshop 3: Review of the strategy and the role of the waste management authority.	Workshop 3: Review of the strategy and the role of the waste management authority.
Workshop 4 Thursday 4th July Final review of the strategy	4th July 2019	Workshop 4: Final review of the strategy and the role of the waste management authority.	Workshop 4: Final review of the strategy and the role of the waste management authority.	Workshop 4: Final review of the strategy and the role of the waste management authority.	Workshop 4: Final review of the strategy and the role of the waste management authority.

HELD TUESDAY 5th JULY 2019 & THURSDAY 7th JULY 2019  
WMAA /DERM QID WASTE MANAGEMENT STRATEGY CONSULTATION WORKSHOPS

