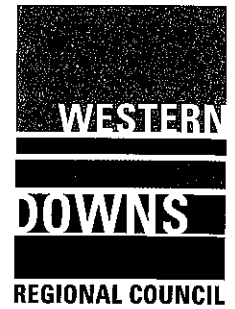


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MLS:WLB

29 July 2010

Project Manager – Queensland's Waste Strategy Consultation  
Natural Resources and Environment  
Department of Environment and Resource Management  
GPO Box 2454  
**BRISBANE QLD 4001**

Via email: [waste.paper@derm.qld.gov.au](mailto:waste.paper@derm.qld.gov.au)

Dear Sir/Madam

**RE: SUBMISSION FOR QUEENSLAND'S WASTE STRATEGY 2010- 2020 CONSULTATION DRAFT**

Western Downs Regional Council notes that the Department of Environment and Resource Management have recently released Queensland's 'Waste Strategy 2010 – 2020: Waste Avoidance & Recycling Consultation Draft' for public comment. The development of a comprehensive strategy by the Government, dealing with this important issue of waste management is welcomed. The Council agrees that a strategy is useful to outline the waste management and minimisation ambitions for a ten year horizon; indeed, many Councils have recognised the importance of having a strategic action plan for such an issue.

This submission relates primarily to the waste levy proposed in the strategy, as most of Councils concerns relate to the cost of administering this levy on behalf of the state.

***Councils Strategic Approach to Waste Infrastructure***

Soon after amalgamation, Western Downs Regional Council recognised the need to consider its waste management infrastructure and services on a more strategic basis. In late 2008 work commenced towards the development of a waste management strategy, which was adopted in early 2009. This infrastructure focussed strategy provided a planned approach for the management of Council's waste management facilities for the short, medium and longer term. The strategy recognises that for waste management, one size does not fit all; and that the waste management infrastructure and experiences in our larger centres are very different to those in some of our more remote locations.

The Council has already begun the implementation of this strategy, for which the title 'Towards a Waste Wise Western Downs' was coined. Some of the major infrastructure items being provided under this project include a major waste transfer station servicing the Dalby area, operational improvements at our major landfill sites at Dalby and Chinchilla, development of two regional landfills in the longer term and in an effort to maximise value for money for our ratepayers, to continue the operation of the remaining 21 current landfill sites until they reach capacity.

Although in its early stages of implementation the strategy has already redirected a significant amount of waste from being disposed at landfill. Council has introduced initiatives such as waste minimisation, waste diversion, industrial waste recycling, greenwaste recycling and the extension of kerbside recycling programs to an additional 2000 properties.

Although Council acknowledges that further progress is needed in the area of waste management, a number of significant improvements have been made in the Western Downs Region following the amalgamation of Councils.

### ***Community Attitudes to Waste Management***

It is acknowledged that some former Councils and members of the community had a poor attitude towards waste management. Western Downs Regional Council has made significant progress in improving the community's attitude as a result of our sound infrastructure and service strategy.

As part of the 2009 infrastructure strategy, the Council communicated its position to the community in relation to waste disposal sites. In summary, this strategy advised that current landfills will continue to be operated until they achieve capacity (i.e. no forced closures), with significant operational improvements occurring.

This strategy generally equates to a business as usual model, and there has been general community acceptance. The strategy has been central to improving the community's attitude towards waste management, to which there has generally been a positive response.

It does have to be acknowledged that some members of the community resist change, particularly in areas of known low socio-economic status. Council is currently preparing to develop a 'soft' waste strategy addressing non infrastructure related issues such as waste reduction targets; economically viable recycling programs; and, public awareness and education.

With the introduction of a waste levy, the Council may be forced to radically depart from its strategy, either to significantly invest in infrastructure and operations associated with the collection of the levy, or to close some sites and risk a significant negative reaction from the Western Downs community.

### ***The Cost of the Proposed Waste Levy***

Central to the new Queensland Waste Strategy is the introduction of a waste levy, and that the Western Downs Regional Council is one of the Councils that will be required to collect this levy for the state. We note that for some years there has been resistance to such a waste levy, and the Council continues to object to this mechanism, and predicts many problems with the levy in our local situation.

The proper administration of the levy will be a significant cost to the Council and other regional local governments, where there is currently little or no infrastructure or systems in place to collect fees.

The costs of collecting the levy at all of the current disposal sites would be significant, even if the operation of these sites is significantly rationalised. Should the levy be introduced, Council considers there to be a need to increase security at our disposal sites, as well as develop collection systems, such as supervision of the sites. Regrettably, it would appear that there is no mechanism proposed for the recovery of Council's additional costs from the State, apart from some additional funding opportunities. The establishment funding, for example, is not expected to cover the full cost of the capital upgrades required at our facilities as a result of the levy.

Council has prepared a simple model indicating the costs associated with the levy collection, this model also estimates the amount of levy that may be generated. The modelling predicts that for Council to continue the operation of these facilities, even on a part time basis for most sites, the costs of collecting the levy will almost be as much as the expected levy revenue.

- This modelling indicates that as much as \$1.3m of additional infrastructure may be required, such as fencing and weighbridges.
- Additional administration costs, including the costs of part time supervision of some twelve busier landfills, and a regular audit at other smaller sites to determine the quantity of waste subject to levy, as well as data recording devices, collection costs etc are expected to cost in the order of \$650,000 annually. Even where a remote site is fenced, and has devices in place to prevent entry of larger vehicles which may contain Commercial & Industrial (C&I) waste, there will be a cost to Council to monitor these sites as C&I or Construction & Demolition (C&D) waste may still enter the site on smaller commercial vehicles, such as utilities.
- The total amount of levy expected to be generated for the State is approximately \$850,000 to \$900,000 annually.

A spreadsheet, indicating the costs likely and the methodology used to calculate these costs is attached.

The Council had already drafted much of its waste management budget for the 2010/11 financial year by the time that the proposed waste levy was announced. This budget had not taken into account the additional costs and funding the development of these programs, and the Council has limited capacity to create additional budget.

### ***Limited Lead Time***

The limited lead time to the introduction of the levy is concerning. It is noted that the levy will commence on 1 July 2011, providing Council with less than twelve months to prepare infrastructure and administrative systems to allow the collection of the levy. Many of Council's landfills will require additional fencing to properly secure these facilities, yet it is unclear whether there are contractors available locally to actually construct all of the fencing that will be required.

It may be likely that the Council may have to close some of the current smaller landfills, rather than upgrade these to collect the levy. The Council would then likely redirect those wastes to other larger, existing landfills. However, upon investigation, it would appear that some of these sites are not able to accommodate additional wastes given their current ERA thresholds, and the process to upgrade some of the thresholds through the Sustainable Planning Act process is expected to take well in excess of twelve months (when considering the time taken to prepare a properly made application, the public notification processes as well as the actual assessment).

From a project management perspective, it should be noted that this Council has almost no capacity at present to undertake these additional tasks, and that many Councils have already completed their 2010/11 budgets with no additional funding to project manage any required changes.

### ***Cost to the Community***

For many of our community members, the levy will place additional cost pressures upon them; greater than that felt by residents in more metropolitan areas.

There are some commodities, such as scrap ferrous metals, that can be economically recycled when in stored in reasonable quantities. The recycling of these products is well established, and is already occurring.

It is acknowledged that in metropolitan areas, the levy 'price signal' is likely to mean that industry will choose greener options, which are well established in South East Queensland and which they already have ready access to, such as recycling or other waste treatment options. The same affordable options are not yet established in regional areas; the costs of establishing such operations is considerable and with lower volumes, and significant travel distances, is unlikely to be cost effective for some time.

For example, Western Downs Regional Council has found that access to mobile concrete crushers has been extremely limited, with most operators being located within South East Queensland. The down time associated with travel from those areas to the Western Downs makes our area extremely unattractive to those operators, and as a result, the costs are significantly greater. We are advised that concrete crushing for Toowoomba Regional Council costs \$11.30 per m<sup>3</sup> for Toowoomba, with the 'establishment' costs ranging from \$2800 in Toowoomba to \$5500 in smaller centres within the TRC area.

A recent concrete recycling exercise by Western Downs Regional Council in mid 2009 found only one operator who was prepared to provide a quotation to recycle concrete in Dalby (which is Western Downs Regional Council's most eastern centre). Other contractors from South East Queensland were not prepared to travel to Dalby to undertake this work. The concrete recycling cost Council \$30.30 per m<sup>3</sup>; even at that rate, the actual cost was significantly greater and the contractor did not complete the work due to unexpected costs. The costs are expected to be even greater where the volumes are less and the travel distances are greater.

### ***Applicable Wastes***

It is noted that the waste levy will apply to wastes other than municipal solid waste (MSW), which is exempt from the levy.

This is pleasing, as there is limited ability to directly control the amount of waste placed in a domestic wheelie (which is the primary source of MSW). However, another large source of MSW is self haul waste from domestic patrons, which is also exempt. There is a concern that there will be a 'leakage' of C&D waste to the MSW stream. For example, some building or other contractors may be less inclined to remove their waste from a job site, and promote self haul to their clients as a cost saving initiative. This material will potentially be left for kerbside collection programs, which are being phased out due to manual handling concerns.

There will be some administrative difficulties associated with the separation of MSW and C&I wastes which is comingled in collection vehicles. For the Western Downs, these wastes are collected by a single side lift vehicle, and there is no practical way to determine the quantity of waste that is subject to the levy and that which is not subject to the levy.

It is also noted that Farm Waste will be considered C&I waste. Domestic waste and farm waste are the most common waste streams for some of Council's smaller facilities, and is generally very similar in its nature. There are some exceptions, those being fencing wire (which is typically recycled) and agricultural plastics (which are very low grade plastics, and often so contaminated with dirt that they are unlikely to be recycled). For these reasons, farm wastes should not be considered C&I waste.

The Council would appreciate further discussion regarding liquid waste inclusion in the levy, in particular the salt deposits from coal seam methane activities which are extremely prevalent on the Western Downs.

### ***Potential For Increased Illegal Dumping***

The Council is greatly concerned about the potential for the waste levy to significantly increase the amount of illegal dumping. Across the Council's area, with many bushland areas, illegal dumping is already a serious issue and may get worse.

The Council is working to change community behaviour, by commencing litter and illegal dumping campaigns, and has been fully pursuing littering offences where evidence can be sought. But unlawful disposal continues to be a problem, especially in our more remote areas, where there is little ability for proper surveillance.

To illustrate, Council is aware of recent illegal dumping of an industrial type waste (pallets, plastic wrappings) that occurred within 100 metres of a rural/regional landfill, which is open to the public 24 hours per day. No evidence providing identifying details was able to be found upon investigation. Under a waste levy regime, this poor behaviour is expected to increase significantly where facilities are either rationalised or there is a greater cost associated with proper waste management.

This is expected to get much worse once the levy is applied, and the Council expects that an increased illegal dumping will have serious environmental, operational and financial consequences.

### ***Funding Arrangements***

It is noted that some funding arrangements are proposed, including the establishment funding as well as the ongoing funding rounds, such as the WARE fund. The redirection of part of the levy proceeds back into the waste industry is appreciated, although it should be extended, especially for the first few years of the levy operation considering actual costs of preparedness for the levy (as previously discussed).

Council submits that should it be required to collect the levy, that the State should fully fund the costs of infrastructure upgrades, as well as meeting the administrative costs of collecting the levy.

### ***Improved Regulatory Framework for Waste Operators***

At present, Council fully utilises the provisions of Section 369 of the Environmental Protection Act to regulate waste operators. Council relies on this mechanism for industry to report waste trends, and more importantly, to control where the operators are disposing of their wastes.

Council has found that well established operators, with good reputations, readily present to Council for registration and are indeed seeking a state wide consistent framework for regulation. Many smaller or less reputable operators however have either limited knowledge or a disregard for these provisions and are more reluctant to adhere to the Act requirements, even where enforcement actions are commenced.

In the Western Downs, some of Council's regional landfills were previously accepting all wastes, and were being targeted by some construction and demolition wastes. In 2009, Council decided to restrict these sites to domestic type wastes only, the facilities were clearly signed and the Council used the S369 mechanism to direct licensed operators to more suitable sites.

However, there are many unlicensed operators, who either contract a tipper truck operator to casually cart waste or self haul C&D wastes. These operators appear to disregard Council's requirements and continue to use these sites unlawfully. Again, in more remote/regional areas, this is difficult to enforce with limited resources.

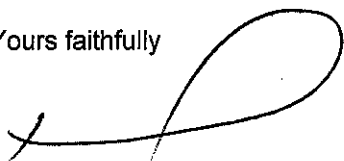
A strengthened waste operators licensing system, with state-wide consistency, and potentially with greater obligations on operators (including self haul C&I and C&D), would be welcomed.

#### ***Acknowledgements***

Western Downs Regional Council appreciates the opportunity to make a submission on the draft waste strategy. Council also acknowledges and thanks Officers of the Waste Strategy branch of the Department of Environment and Resource Management, specifically Mr Mike Gerlach. Mike has been kind enough to travel to the Western Downs to discuss the strategy and the levy implications, and has been extremely approachable during the consultation period.

Should further clarification be required on this submission, contact can be made with Council's Environment and Health Manager, Todd Summerville, on (07) 4672 1172.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Phil Berting', written over a horizontal line.

Phil Berting  
**CHIEF EXECUTIVE OFFICER**

Waste levy - Costing exercise

Infrastructure Required to collect levy

Site	Closure	M3 estimate	Tonnes est	Details	Metres	Cost	Annualised	Add. Recurrent Costs	Est Levy Waste (t)	Levy Revenue
Dalby Landfill	2014			Nil		\$ -	\$ -			
Dalby Transfer	N/A	60000	22800	Weighbridge		\$ 150,000	\$ 15,000	\$ 10,000	12000	\$ 420,000
Chinchilla	2020	15000	5700	Weighbridge		\$ 150,000	\$ 15,000	\$ 10,000	4000	\$ 140,000
Miles	2014	5000	1900	Fencing	1000	\$ 50,000	\$ 5,000	\$ 100,000	1500	\$ 52,500
				Weighbridge		\$ 150,000	\$ 15,000			
Wandoan	2014	1500	570	Fencing	800	\$ 40,000	\$ 4,000	\$ 60,000	1500	\$ 52,500
Condamine	2011	500	190	Fencing	800	\$ 40,000	\$ 4,000	\$ 60,000	500	\$ 17,500
Tara	2020	3000	1140	Fencing	1000	\$ 50,000	\$ 5,000	\$ 100,000	1000	\$ 35,000
K'Bun Transfer	N/A	540	205	Nil				\$ 5,000	100	\$ 3,500
Meandarra	2014	1500	570	Fencing	800	\$ 40,000	\$ 4,000	\$ 40,000	100	\$ 3,500
Jandowae	2020	3000	1140	Fencing	2500	\$ 125,000	\$ 12,500	\$ 50,000	500	\$ 17,500
Kogan	2014	1000	380	Fencing	1000	\$ 50,000	\$ 5,000	\$ 40,000	500	\$ 17,500
Bell	2014	3000	1140	Fencing	800	\$ 40,000	\$ 4,000	\$ 40,000	500	\$ 17,500
Warra	2020	3000	1140	Fencing	800	\$ 40,000	\$ 4,000	\$ 40,000	500	\$ 17,500
Moonie Transfer	N/A	700	266	Fencing	600	\$ 30,000	\$ 3,000	\$ 40,000	100	\$ 3,500
Ducklo	2020	2700	1026	Fencing	1500	\$ 75,000	\$ 7,500	\$ 40,000	500	\$ 17,500
Burra Burri	2020	500	190	Fencing	600	\$ 30,000	\$ 3,000	\$ 15,000	20	\$ 700
				Height restrictor		\$ 5,000	\$ 500			
Drilham	2020	500	190	Fencing	600	\$ 30,000	\$ 3,000	\$ 15,000	20	\$ 700
				Height restrictor		\$ 5,000	\$ 500			
Dulacca	2017	500	190	Fencing	600	\$ 30,000	\$ 3,000	\$ 15,000	20	\$ 700
				Height restrictor		\$ 5,000	\$ 500			
Yamston	2020	1500	570	Fencing	600	\$ 30,000	\$ 3,000	\$ 15,000	200	\$ 7,000
				Height restrictor		\$ 5,000	\$ 500			
Cooranga North	2013	150	57	Fencing	600	\$ 30,000	\$ 3,000	\$ 15,000	20	\$ 700
				Height restrictor		\$ 5,000	\$ 500			
Macalister	2011	4500	1710	Fencing	600	\$ 30,000	\$ 3,000	\$ 15,000	1000	\$ 35,000
				Height restrictor		\$ 5,000	\$ 500			
21 Mile	2014	4500	1710	Fencing	800	\$ 40,000	\$ 4,000	\$ 15,000	1000	\$ 35,000
				Height restrictor		\$ 5,000	\$ 500			
Glenmorgan	2014	50	19	Fencing	400	\$ 20,000	\$ 2,000	\$ 15,000	5	\$ 175
				Height restrictor		\$ 5,000	\$ 500			
Data recording devices				Mandalay units (x12)		\$ 60,000	\$ 12,000			
Bad debts				Bad debts				\$ 8,955		
Subtotal		112640	42803.2			\$ 1,370,000	\$ 143,000	\$ 763,955	25585	
Annualised Subtotals							\$ 143,000	\$ 906,955		\$ 895,475