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06 July 2010

Project Manager, Qld Waste Strategy Consultation
Dept. of Environment & Resource Management
PO Box 2454
BRISBANE Q 4001

Dear Sir / Madam,

RE: QUEENSLAND WASTE MANAGEMENT STRATEGY 2010-2020 CONSULTATION

Thank you for the opportunity to make comments on the proposed Queensland Waste Strategy 2010-2020 and its companion document, the proposed Industry Waste Levy Consultation Draft.

I hope that the Whitsunday Regional Council comments, which follow, will be helpful in formulating this important strategy for Queensland.

Executive Summary - P 2

Waste Generation not exceeding population growth. Does not say how this will be achieved.

65% recovery of MSW by 2020 – the Strategy does not say how this will be achieved

Reducing green & organic waste to landfill without gas recovery. Strategy does not say by how much.

Reducing emissions from household waste by one third. Strategy does not say how this will be achieved

Recycling targets. How will these be measured, i.e. by weight or volume? And what is included and excluded from definitions?

Challenge 2 – P 6

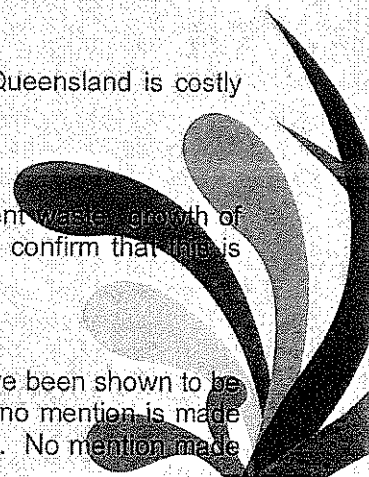
It is noted that the strategy acknowledges that recycling in regional Queensland is costly due to higher transport costs and risk of rejected loads.

Challenge 7 – Pp 8-9

How are the growth projections worked out? Can we trust an apparent waste growth of 40% in only 4 years as being correct? Experience elsewhere would confirm that this is more readily explained by better data capture over time.

Changing the Focus - Pp 12-13

In the table there is no mention of fiscal measures which elsewhere have been shown to be the prime mover for change. Whilst product stewardship is proposed, no mention is made that in the end the consumer (or "informed" consumer) will have to pay. No mention made



of landfill or disposal tax which has been used effectively elsewhere to disincentivise landfill, but which features later in the document. Conversely no mention is made of the potential for a levy or tax to be raised and then re-invested in waste infrastructure such as recycling MRFs or Advanced Thermal treatment plants, but again these are mentioned later – why not in the section which sets the scene?

P 17

It is acknowledged that the Strategy sees the need for local solutions

Targets – P 19

Strategy's Aim. The Strategy is weak on aims. It talks about significant improvements but what is meant by this? To what end are improvements being proposed? Is it to recover resources, save money, reduce greenhouse gases or something else? This should be clear in the Aims section.

How are these targets to be achieved? And what will be their relevance to individual Councils, i.e. will each Council be given a 65% target for MSW recycling?

Waste Levy – P 26

What is the strategic context of the proposed levy figures? In the context of a "possible introduction of a carbon pollution reduction scheme... to reduce greenhouse gas emissions" (P. 3) for example, what reduction in landfill gas CH₄ will be achieved by the levying of \$35 per tonne from inorganic Construction and Demolition waste? Surely in this context the focus would have to be on Municipal waste, where a levy of \$0 is proposed. If the Government is serious about changing behaviour through introducing a levy (Pp. 25, 26) then the wastes affected by the levy need to be those which cause the problems.

Taking Action

Waste Avoidance P 30

The targets being proposed are sensible, but surely the important target should be overall tonnage, not tonnes per person, especially if the strategy is looking to de-couple population growth from waste growth. Also to measure a reduction in amounts of waste, a reliable baseline needs to be established first. I would not be willing to sign up to a reduction target if I had no confidence in the baseline figure. With no requirement to record waste volumes accurately, how can anyone be sure about how much waste any Council is currently managing? Recording of waste data is improving, but many sites do not have weighbridges at present and so how can anyone put a reliable figure on waste now or in the past?

Resource recovery P 32.

What is the "road map" for achieving these targets? And what is their strategic context, e.g. what outcomes are envisaged from recycling 50% of municipal waste, i.e. what reduction in waste to landfill does this translate to? And how is the aggregated target supposed to work? Experience of a Performance Targets approach would suggest that there would be a strong temptation for remote areas to say "let Brisbane do it all", and why not? If the government is not going to set a target for individual councils to achieve, then individuals are not going to attempt to achieve it.

Also we need to be wary of a %age target, both in terms of reliability of the figures and unintended consequences. Experience elsewhere shows that numbers can be "manipulated" – particularly %ages. When more waste gets recycled, this always results in a sharp increase in the total amount of waste which is managed.

And are we happy with the 2008 baseline, as per Waste Avoidance, above.

Disposal P 33

The only truly measurable target which can't be manipulated would be a target for reduction in waste sent to landfill from a reliable baseline figure, and only then if weighbridges are compulsory.

Actions

Pp 33-34

Do the Right Thing – It would be worth adding in something like "where suitable and where sustainable recycling routes exist" so that unrealistic expectations are not created. It might be a good idea to have a recycling bin, but is there anything in place to empty it, sort out the contaminants, and recycle what's left after transporting it in a sustainable manner to the recycling plant?

P 35

Action 5. Needs to be a transparent process

Action 8. Would this include old landfill sites which once provided a valuable local facility but which now do not comply with industry best practice?

P37

Action 15. It would be better to work out i) what would be the treatment route,

ii) what to do about contamination, and iii) the final destination for the green waste before collecting it.

Action 16. Waste Education and Waste Awareness. Need to link up Actions 2, 10, 13, 15, 16, 17, 23 and 26. It is vital that State Government takes the lead on waste education and recycling promotion. This ensures uniformity of the message across the state, and reduces confusion for everyone e.g. different colours for recycling bins in neighbouring areas as happens in the UK. Also guarantees a minimum level of professionalism of promotional material, better access to celebrity endorsement, and stronger brand identification than most small to medium sized councils could manage; and enables small councils to concentrate on their core business, not advertising work for which we are ill equipped. Some good examples from the UK would be the "Recycle For..." brand, and the "everything deserves a second chance" and "the possibilities are endless" campaigns.

P 39

Action 25. Wood: how about burning it? If this strategy is to operate within an overall environment of CPRS, rising energy costs and concerns like peak oil, surely the potential for obtaining energy from waste needs to be vigorously pursued.

Proposed Industry Waste Levy Consultation

Terminology P 1

Higher & Lower hazard Regulated Waste. It would be useful to know into which of these two categories asbestos falls.

Queensland Industry Waste Levy Model P 2

Levy amount. Why have these levels been proposed?

Estimated revenue & potential impact. How was \$96M income worked out? I have worked it out and come up with:

From Page 1, 10.3 Mt of waste p.a., 67% of which is landfilled i.e. approx. 6.9Mt. 60% of this is C&I, i.e. 4.14 Mt. @ \$35 per tonne, this is approx. \$145M

In any case either figure falls significantly short of the \$299M required to fund the proposed WARE (\$159M), SFF (\$40M p a) and State Govt Environmental Initiatives (\$100M) programs being proposed.

How was impact of \$101 per year per business worked out? I have worked this out 2 different ways and reckon that a likely figure in the Whitsunday Region could be somewhere between \$170 and \$400?

P 5

Weighbridges. A minor point, but what about facilities *inside* the levy zone without weighbridges?

Establishment Funding. Covert video cameras needed for remote illegal dumping spots as well as within waste disposal facilities

P 6

WARE fund

Assume it is \$159M over 4 years i.e. approx. \$40M per year?

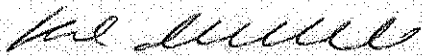
The difference between the WARE and SFF is not clear. And what are "State Govt. Environmental Initiatives?"

How will these funds be administered? Will there be industry input into the decision-making process?

Will funding through these streams be made purely on a bids basis? Has the option of feeding back funding to high performers via a "credits" system been thought of? Say the landfill levy is \$35. A council or other group diverts one tonne from landfill and claims say \$25 back as a credit. The Council would have to re invest this in waste infrastructure or in improved waste services. Other types of organisation could use the credits how they liked.

Once again thank you for the opportunity to comment. If I can be of further assistance please do not hesitate to contact me.

Yours Sincerely,



Karl Murdoch
Waste Management Officer