

17 December 2012

The Secretary Agriculture, Resources and Environment Committee Parliament House George Street BRISBANE QLD 4000

Email: arec@parl.qld.gov.au

Dear Sir/Madam

Re Waste Reduction and Recycling and Other Legislation Amendment Bill 2012

The Motor Trades Association of Queensland (MTA Queensland) welcomes the opportunity to provide a submission to the Committee on the *Waste Reduction and Recycling Other Legislation Amendment Bill 2012* (The Bill).

MTA Queensland is the peak organisation in the State representing the specific interests of 2,500 businesses in the retail, repair and service sector of the Australia's automotive industry. It is an industrial association of employers incorporated pursuant to the Industrial Relations Act of Queensland.

We have considered the Bill from the perspective of the automotive trades and our responses reflect the views of MTA Queensland members. Our members were supportive of the Government' decision to abolish the waste levy early this year and continue to be supportive of the further measures tovalidate the repeal of the waste levy in the *Waste Act*.

Our support of these measures is in part owing to the fact that the industry has itself implemented its own measures to manage waste in the context of environmental management. These measures are outlined briefly below.

Green Stamp Plus Program

MTA Queensland's Green Stamp Plus Program (GSPP) assists and rewards Members to be responsible environmental stewards in terms of their own businesses operations. The GSPP was introduced to "assist small to medium businesses in the automotive trades to incorporate processes and practices that avoid, reduce, reuse, recycle and dispose of their wastes in an environmentally sensitive manner."

Motor Trades Association Of Queensland

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The GSPP originated from an environmental initiative developed by the MTA Queensland and other state Motor Trades Associations in conjunction with the former Commonwealth Department of Environment and Heritage to develop a fair and equitable environmental accreditation for the automotive trades. Since being introduced, the program has assisted hundreds of businesses to implement processes and procedures which act to limit the environmental impact of their operations.

Under GSPP, the key areas considered essential to reducing the environmental impact of the automotive industry are:

- Storage practices associated with chemicals and other hazardous substances;
- Pre-treatment of wastewater from the workshop prior to approved disposal;
- Spill management to prevent pollution of ground and stormwater systems;
- Correct disposal of waste products (preferably to recycling or reuse);
- Air quality management;
- Energy and resource conservation; and
- The development and implementation of environmental management plans.

Under the GSPP, businesses have the opportunity to meet, in chronological order, one or all of the three Accreditation levels. Each stage specifies particular requirements that a business needs to meet. Accreditation Certificates indicate compliance and displayed for customers to recognise an individual business' level of achievement. The GSPP Accreditation guide is provided as an appendix to this submission.

Education and Training

The Association's training arm, the MTA Institute of Technology (MIT) is the largest automotive apprentice trainer in Queensland, training more than 2000 automotive apprentices each year. Environmental education/training is a core unit for apprenticeships, traineeships and skills recognition in courses provided by MIT.

From the MTA Queensland's perspective, it is a priority to ensure that the automotive trades has access to or has a workforce with knowledge of relevant environmental regulations and codes coupled with the capability and knowledge to apply the information as sound practice in the workplace.

MIT delivers nationally endorsed apprenticeships and traineeships in the Automotive Light Vehicle, Automotive Mechanical, Automotive Electrical, Automotive (Mechanical Technology), Automotive Sales based on the nationally endorsed standards of the AUR05 Automotive Industry Retail, Service and Repair Training Package.

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By way of example, for Certificate II in Automotive mechanical (AUR20705) one of the following units of competence is compulsory:

- AURC272003A Apply environmental regulations and best practice in a workplace or business (applicable to tyre fitters and others not involved in mechanical repairs);
- AURT271781A Implement and monitor environmental regulations in the automotive mechanical industry (*applicable to mechanical repairers*).

Conclusion

In conclusion we reiterate our support for the legislative measures that validate the repeal of the waste levy on 1 July 2012 and the removal of references to the waste levy in the *Waste Act*.

We would be pleased to provide further comment on any matters in our submission that may require clarification and we would be pleased to participate in any further deliberation on ERA 21.

Yours sincerely

Kellie Dewar MTAQ General Manager

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|-----------------|---------------------|------|
| Trading Name | _ Membership Number | Date |
| Contact Name | _Email | |

Levels of Accreditation

Businesses can meet one or all of the three levels of Accreditation. Each level specifies particular requirements. After meeting the requirements of each stage a certificate of accreditation are issued which can be displayed to customers identifying **an individual business' level of** achievement.

Level 1 – Compliance

The basic entry requirement into the Green Stamp Plus Accreditation program. The environmental criteria in Level 1 Compliance establishes that businesses hold all relevant permits and licenses and operate in a manner that meets all legislative requirements. The criteria detailed in Level 1 have been designed to incorporate other important considerations contained within relevant industry Codes of Practice. See page 6. If particular criteria are not applicable to your business you can still receive accreditation by meeting all other relevant criteria.

Please note that achieving Level 1 – Compliance does not grant your business Accreditation. Accreditation is only awarded to businesses that achieve Level 2 – Beyond Compliance.

Level 2 – Beyond Compliance

Businesses must achieve the Level 1 requirements plus demonstrate that they have moved beyond compliance to incorporate a minimum number of sound environmental management practices into their day-to-day operations. This could include the recycling of particular wastes or installing energy efficient lighting. Thirteen areas in the Level 2 – Beyond Compliance checklist must be achieved to earn this level of accreditation.

Level 3 – Best Practice

This is the final level of accreditation. It is based on the principle of continuous improvement and requires businesses to develop and implement an environmental management plan to help monitor and review their current practices and set objectives or targets for further improvement. Four areas in the Level 3 – Best Practice checklist must be achieved to earn this level of accreditation. See page 8.

Self Assessment Accreditation Level 1 –Compliance

All applicable criteria in Level 1 must be met to be compliant with legislative requirements. Please note that achieving Level 1 – compliance does not grant your business Accreditation. Accreditation is only awarded to businesses that achieve at least Level 2 – Beyond compliance.

| Assessment | | nt | Criteria | Additional information | |
|--------------|------|-------|---|---|--|
| | | | Environmental Manageme | | |
| Yes | 🗖 No | □ N/A | Management and staff are aware of environmental responsibilities | This could be carried out by a staff induction, on the job training or staff meetings | |
| 🗖 Yes | 🗖 No | 🗖 N/A | Material Safety Data Sheets (MSDS) are held onsite for all hazardous chemicals and are easily accessible by staff | MSDS are available from your suppliers and provide information on the safety and environmental requirements for the chemicals | |
| | | | Copies must be sighted at time of audit | | |
| Yes | □ No | □ N/A | Business has an environmental license | The Auditor will need to see the certificate License Number: | |
| | | l | Resource Efficiency | | |
| 🗖 Yes | 🗖 No | □ N/A | Lights are switched off after hours or when not required | Consider signs to remind staff to switch off lights when not required | |
| 🗖 Yes | 🗖 No | 🗖 N/A | The compressor is turned off after hours | Consider signs to remind staff to switch off the compressor after hours | |
| 🗖 Yes | 🗖 No | 🗖 N/A | Computers are switched off after hours | Consider signs to remind staff to switch off computers when they are not in use for over an hour | |
| 🗖 Yes | 🗖 No | □ N/A | (If required) a permit is held for washing vehicles | In some areas water restrictions do not allow vehicles to be washed, in these circumstances a permit should be applied for | |
| | | | Preventing Water Pollutio | | |
| 🗖 Yes | 🗖 No | □ N/A | Stormwater drains are clear of oily plumes and litter | There should be no signs of contaminants near the stormwater drains | |
| 🗖 Yes | 🗖 No | 🗖 N/A | All vehicle washing is conducted in a bunded, undercover washdown bay that drains to an oil water separator | Vehicle runoff should not run onto land or into stormwater | |
| 🗖 Yes | 🗖 No | □ N/A | Large quantities (>250I) of hazardous liquids are stored in a bunded area | A bund is a low wall or construction that prevents liquid from leaving a liquid storage area. A bund | |
| 🗖 Yes | 🗖 No | □ N/A | All hazardous substances are stored in a bunded undercover area on sealed ground | needs to be capable of containing a spill if it were to occur | |
| 🗖 Yes | 🗖 No | □ N/A | Parts containing liquid are stored in a bunded, undercover area on sealed ground | | |
| | - | | Preventing Air Pollution | | |
| 🗖 Yes | 🗖 No | 🗖 N/A | If decommissioning air conditioning systems, an ARCtick licence is held by the business and relevant technicians | Licences are required for handling refrigerant and decommissioning air conditioning systems | |
| 🗖 Yes | □ No | □ N/A | Licenses must be sighted at time of audit Reclaimed refrigerants are removed for appropriate | Store refrigerants in a recovery cylinder and return to | |
| | | | disposal by a licenced company Copy of 3 receipts required | a licenced wholesaler | |
| Yes | 🗖 No | □ N/A | LPG tanks are emptied by a licenced LPG mechanic Licenses must be sighted at time of audit | A licenced LPG mechanic can remove LPG from a tank. LPG should not be released into the atmosphere | |
| | | | Managing Wastewater | | |
| 🗖 Yes | 🗖 No | □ N/A | Any wastewater from the workshop floor or a washbay is collected and removed for disposal by a licensed contractor <u>or</u> disposed of through an oil water separator to the sewer | All waste water must be collected for disposal or put through an oil water separator before going to sewer Copy of 3 receipts required | |
| 🗖 Yes | 🗖 No | D N/A | If waste water is sent to the sewer you should hold a trade waste permit Copy of permit required | Trade waste permits are issued by Local Council Authorities and permit the discharge of waste water to the sewer | |
| | | | Managing Wastes | | |
| ☐ Yes | □ No | □ N/A | Liquid wastes are removed for disposal by a licensed contractor this includes: coolant waste oil caustic solvents brake fluid | Liquid wastes must be disposed of appropriately to reduce soil and water contamination Receipts should be provided by the licenced contractor that removes the liquid wastes Copy of 3 receipts required | |
| D Yes | 🗖 No | D N/A | fuel Tyres are collected for recycling | Name of Company copy of 3 receipts required | |
| 🗖 Yes | D No | D N/A | Batteries are stored in a bunded, undercover area on sealed ground or in a sealed battery box. Battery acid is left inside the batteries | Batteries can not be disposed of to landfill Batteries are collected by a licensed contractor Copies of three receipts required | |
| | 1 | 1 | Preventing Noise Pollutio | | |
| | | | Noisy activity is limited to Council permitted hours | Only operating in normal business hours prevents | |

Self Assessment Accreditation Level 2 – Beyond Compliance

To achieve Level 2 – beyond compliance, **thirteen** criteria must be met. Accreditation is only awarded to businesses that achieve at least Level 2 – Beyond Compliance.

| Assessment | | ent | Criteria | Additional information |
|--------------|------|-------|--|--|
| | | | Environmental Managemen | |
| 🗖 Yes | D No | □ N/A | COMPULSORY CRITERIA The business has an environmental management system in place Copy of EMS required | An EMS provides a business with goals and an action plan for environmental management. Contact the MTAQ for an EMS guide |
| Yes | □ No | □ N/A | The business has and displays an environmental management policy Location: | An EMP declares a businesses commitment to the environment and can be displayed in a reception area or similar to demonstrate the commitment to customers and staff |
| | | | Resource Efficiency | |
| TYes | □ No | □ N/A | Skylights or natural light is used to reduce energy consumption | Skylights can increase the natural light and reduce the need for artificial lighting |
| TYes | | | Energy efficient equipment is used Equipment: | Equipment with a high energy rating can be used to reduce your energy consumption |
| J Yes | 🗖 No | 🗖 N/A | Recycled paper is used for printing Brand: | Printing paper made from recycled content reduces landfill |
| Y es | 🗖 No | 🗖 N/A | Energy efficient lighting is used Type of globe: | Energy efficient globes such as T5 fluro or LEDs reduce energy consumption |
| J Yes | 🗖 No | 🗖 N/A | Recycled parts from licensed Auto Parts Recyclers are used when possible | Using recycled parts from licensed Auto Parts Recyclers reduces the amount of waste sent to landfill |
| 🗖 Yes | 🗖 No | D N/A | Copies of receipts must be sighted Waterless car cleaning products are used to clean vehicles | There are a range of car cleaning products that do not require water |
| T Yes | 🗖 No | 🗖 N/A | Vehicles are washed with a 9 litre per minute high pressure low volume spray or bucket of water | These methods use less water |
| | | | Preventing Water Pollution | I |
| T Yes | 🗖 No | 🗖 N/A | All external openings of the workshop are bunded or the floor is sloped inwards | Bunding the external openings or sloping the floor inwards prevents liquids from leaving the workshop |
| T Yes | 🗖 No | 🗖 N/A | An adequate number of emergency spill kits are available and easily accessible | Spill kits contain absorbents and protective equipment to aid in spill clean up |
| ⊐ Yes | 🗖 No | □ N/A | Staff are trained in spill management and spill clean up instructions are easily accessible Spill instructions must be sighted at time of audit | For information on spill management request a Management plan from MTAQ |
| 🗖 Yes | 🗖 No | D N/A | Stormwater drains are clearly marked to discourage pollution disposal into drains | Drains can be marked using painted slogans such as "only rain goes down this drain" |
| 🗖 Yes | 🗖 No | 🗖 N/A | All repair and servicing work is conducted inside the workshop or in a bunded undercover area | To prevent water pollution, all dismantling work should be conducted inside |
| | | | Preventing Air Pollution | |
| 🗖 Yes | D No | □ N/A | Lids are kept on liquid containers | Air pollution can occur through odours and evaporation. To minimise this keep the lids on chemical containers such as solvent. If necessary display signs to remind staff |
| 🗖 Yes | 🗖 No | 🗖 N/A | Parts are washed in a water or steam based parts washer | Water or steam based parts washers don't use solvents |
| | | | Managing Wastewater | |
| 🗖 Yes | 🗖 No | 🗖 N/A | If a separator is used to manage wastewater, it is serviced regularly and a log is kept of services Service log must be sighted | Most separators need to be serviced quarterly. Receipts of service can be kept as a log. Logs demonstrate responsible maintenance |
| 🗖 Yes | 🗖 No | 🗖 N/A | Phosphate free, biodegradable detergent is used. MSDS or label must be sighted | Phosphate free detergents are better for the environment as phosphates increase nutrient levels in water and promote algae bloom |
| | | | Managing Wastes | |
| 🗖 Yes | □ No | □ N/A | The following items are separated and collected for recycling: scrap metal paper and Cardboard plastic bumper bars and headlights rags glass | By recycling wastes you will reduce the amount added to landfill and save energy as well Copy of 3 receipts required |
| 🗖 Yes | 🗖 No | 🗖 N/A | Waste drums and containers are clearly labelled | To aid waste separation label containers clearly |
| | | _ | Preventing Noise Pollution | |
| 🗖 Yes | 🗖 No | 🗖 N/A | Equipment is serviced and maintained to reduce noise | Well maintained equipment is less noisy |

Self Assessment Accreditation Level 3 – Best Practice

Once Level 2 – Beyond compliance has been achieved, business can aim for Level 3 – Best Practice. To achieve Level 3 - Best Practice **four** criteria must be met.

| | Assessment | | Criteria | Additional information |
|--------------|------------|-------|---|---|
| | | | Environmental Managemen | t |
| ☐ Yes | ☐ No | □ N/A | COMPULSORY CRITERIA The environmental management system is used to ensure the ongoing environmental performance through a self assessment checklist that monitors environmental practices regularly and incorporates future improvements Copy of EMS plan and assessment required | An EMS provides a business with goals and an action plan for environmental management. Carrying out a self assessment will help identify ways you can improve your environmental management Contact the MTAQ for an EMS guide or assessment checklists. |
| | | | Resource Efficiency | |
| ☐ Yes | D No | □ N/A | The businesses' electricity is supplied from Green Power Copy of electricity company letter/bill required | Many electricity companies offer the option of obtaining electricity from clean production sources |
| Yes | 🗖 No | 🗖 N/A | An energy audit of the business has been conducted | An energy audit will identify where electricity is being consumed and where it can be reduced |
| □ Yes | 🗖 No | □ N/A | Water use reduction measures are used: | several options are available for reducing water consumption such as dual flush toilets, flow reducers on taps and trigger nozzles on hoses |
| □ Yes | 🗖 No | □ N/A | Water use reduction measures are used: | - |
| D Yes | 🗖 No | □ N/A | Petrol is collected and recycled | Unused petrol from tanks is collected and stored appropriately and re-used or removed for recycling |
| 🗖 Yes | 🗖 No | □ N/A | The business has measured its carbon footprint to determine ways to minimise its environmental impact | Several independent companies offer this service which identifies how much carbon is emitted by your company's activities |
| Yes | 🗖 No | D N/A | All fleet vehicles have a "Green Vehicle Guide" (GVG) star rating of 3 4 or 5 | The GVG is available at www.greenvehicleguide.gov.au |
| 🗖 Yes | 🗖 No | D N/A | Greywater is recycled onsite | water from car wash bays or similar can be reused after onsite treatment |
| ☐ Yes | □ No | □ N/A | Rain water is collected and used onsite | Use rainwater tanks to capture rain water and use it to reduce mains water consumption. Uses could include vehicle washing, or it could be connected to bathroom pipes |
| | | | Managing Wastes | |
| □ Yes | D No | □ N/A | Food waste is composted | Food waste can be composted in a compost bin, a bokashi basket or even a worm farm, the resulting compost can then be used on the garden, this reduces the waste going to landfill |
| □ Yes | 🗖 No | □ N/A | A coolant recycling machine is used to recycle solvents internally | Solvent recycling stills can be used to recycle solvents on site |
| | _ | | Other | |
| □ Yes | D No | □ N/A | Initiative: | Additional initiatives in the spirit of environmental protection and conservation will be considered for level 3 - Best Practice and will be awarded solely at the discretion of MTAQ |
| □ Yes | 🗖 No | □ N/A | Initiative: | |

Becoming Green Stamp Plus Accredited

Becoming Green Stamp Plus Accredited is a 4-step process.

Step 1.

Undertake a self assessment of your business using the assessment criteria in this information pack.

Assess the environmental management issues at your site and identify where you can make improvements to ensure you meet environmental compliance.

Proceed to step 2 if all the criteria in Level 1 – Compliance and 13 of the Level 2 – Beyond compliance have been met.

Step 2.

Fill out an application form on page 10 to register your interest in becoming a Green Stamp Plus Accredited business. Lodge your application form with a cheque or credit card details for the appropriate amount to:

Green Stamp Plus Accreditation MTAQ PO Box 4530 Eight Mile Plains QLD 4113 F 07 38444488 E info@mtag.com.au

Step 3.

When your application is recieved the MTAQ will contact you to arrange a visit to your site. An MTA Accreditation audit will be undertaken assessing the environmental issues associated with your business to ensure that you meet the accreditation criteria.

Step 4.

When the environmental audit is completed you will be given a level 1 - Compliance, Level 2 – Beyond Compliance or Level 3 – Best Practice Green Stamp Plus Accreditation.

Level 2 and 3 accredited businesses will receive a certificate of accreditation.

Cost of Accreditation

| MTAQ Members | Initial application \$165.00 (inc. GST) | |
|--------------|---|--|
| | Annual review audits \$50.00 (inc. GST) | |
| Non-Members | Initial application \$ 260 (inc. GST) | |
| | Annual review audits \$75.00 (inc. GST) | |

Initial fee includes:

- One accreditation audit of the business
- Certificate of accreditation for level achieved.
- The right to display the Green Stamp Plus logo anywhere on the premises or on any of the businesses stationery or signage
- The right to promote the business as "Green Stamped"
- The opportunity to benefit from any Green Stamp Plus marketing campaign

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Green Stamp Plus Accreditation application form

| Trading Name | |
|---|--|
| Street Address | |
| | |
| MTAQ member number | |
| Telephone | Fax |
| Postal Address | |
| Email | |
| Full name(s) of proprietor (s) | |
| Mr / Mrs / Ms | |
| Surname | First name |
| Mr / Mrs / Ms | |
| Surname | First name |
| Contact Person (If different from proprietor) | |
| Surname | First name |
| Position | |
| Level of Accreditation being applied for: | |
| □ Level 1 - Compliance □ Level 2 - Beyond | Compliance |
| If a business fails to meet the accreditation criteria a their audit inspection, the business will forfeit one the are therefore encouraged to carefully ensure compli- inspection. Additional compliance assistance is avail- | nird of the administration fee paid. Businesses ance before confirming the date of audit |
| Payment Details | |
| Amountincluding GST | |
| □ Cheque | |
| □ Credit Card Please tick: Visa □ Master | card 🗆 American Express 🗆 |
| Name on card Card Number Expiry / | |
| Return form and payment to the N | lotor Trade Association of QLD |
| PO Box 4530, Eight Mile | e Plains QLD 4113 |

info@mtaq.com.au

Green Stamp Plus declaration

I / We ______ hereby make application to become certified under the Green Stamp Plus Accreditation and solemnly declare that my / our business complies with the criteria for membership of the Accreditation.

I / we have read and understood the criteria requirements of the Accreditation and I / we willingly agree to the inspection of my / our premises, equipment and processes by duly authorised member of the Green Stamp Plus Program or MTAQ staff at any time during normal working hours for purposes of the accreditation.

I / we understand that annual review audits are required in order to maintain the currency and validity of my Accreditation, and that these annual reviews are charged at \$50.00 (inc. GST) for MTAQ members and \$75.00 (incl. GST) for non members.

I understand that the Accreditation – including the use of the Green Stamp Plus logos is not transferable between sites, and becomes void if the Accredited business is sold or ceases to operate.

If at any time I / we fail to meet the required standards of the Accreditation, the MTAQ reserves the right to withdraw either the Accreditation (or associated levels of Accreditation) as deemed necessary.

I / we agree that in the event of my / our ceasing to qualify for membership of the Accreditation I / we will immediately notify the MTAQ in writing of this fact and remove from display all promotional materials relating to the Green Stamp Plus Accreditation.

| Signed | |
|------------|--|
| Print name | |
| Date | |
| | |
| Signed | |
| | |
| Print name | |
| Date | |