



3 January 2013

Mr Ian Rickuss
Chair
Agriculture, Resources and Environment Committee
Parliament House
Brisbane QLD 4000

Dear Mr Rickuss

Re: Waste Reduction and Recycling and Other Legislation Amendment Bill 2012

Thank you for the opportunity to comment on the Waste Reduction and Recycling and Other Legislation Amendment Bill 2012 (the **Bill**).

Stanwell Corporation Limited (**Stanwell**) welcomes the changes that the Bill proposes in relation to the changed requirements for the preparation of Waste Reduction and Recycling Plans. The changed definition of "State entity" as proposed in clause 34 of the Bill will reduce administrative burden for Government Owned Corporations (**GOCs**). It will also ensure that the Waste Reduction and Recycling Act in its amended form will not put GOCs at a competitive disadvantage in comparison to private corporations' administrative waste management obligations.

However, we kindly ask that more clarity be provided to the obligation of submitting annual waste data returns. Clauses 21, 28 and 41 of the Bill are currently unclear as to whether GOCs and/or all owners of regulated waste facilities will have the obligation of submitting annual waste data returns if the Bill were passed in its current form. The drafting of the respective sections should ensure that they do not impose more onerous obligations on GOCs in comparison to competitors in the electricity sector and to the implementation of regulated waste facility management obligations in the mining sector.

Should you need clarification or have questions, please do not hesitate to contact Dr Stefanie Roth, Environmental Specialist Projects and Strategies on 07 3228 4186 or at Stefanie.roth@stanwell.com.

Yours sincerely

A handwritten signature in black ink, appearing to read "Javier", with a long horizontal flourish extending to the right.

Javier Cabrera
Manager Environment (Corporate)

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