



The Chairman
Agriculture, Resources and Environment Committee
Brisbane
Queensland 4000 Australia

11 January 2013

By email: arec@parliament.qld.gov.au

Dear Chairman,

Waste Reduction and Recycling and Other Legislation Amendment Bill 2012 - invitation to make a submission

Sustainable Business Australia (SBA) is the leading Australian business peak body and think-tank promoting commercial solutions to secure a just and sustainable world.

SBA is a national, not-for-profit, non-partisan business membership association that represents a range of organisations, drawn from all sectors and industries. With our unique, cutting-edge network, we conduct relevant business forums and seminars on key and current issues each year, attracting leading keynote speakers and panellists that include SBA members from sectors relevant to the topic at the time.

Our comprehensive membership includes Abergeldie Complex Infrastructure, AGL Energy Limited, ARUP, Australian Ethical Investors, Australian Sustainable Business Group, Australian Meat Processors Corporation, Global Renewables Limited, Zero Waste Australia, General Electric, the National Australia Bank Limited, Parsons Brinckerhoff, Object Consulting, Purves Environmental Fund, Sinclair Knight Merz, and GDF Suez / SITA Australia. And through our MoU with the community organisation, APEX Australia, we provide support for capacity building and knowledge transfer on sustainability to its 33,000 members across Australia.

We represent the interests of recycling and waster management companies as well as users, transporters, and other interested stakeholders, and we thank the Committee for the opportunity to make this submission. Our apologies for the delay in our submission to the Committee.

On the aspects that the Bill seeks to amend, SBA makes the following submission:

Remove references to the waste levy and validate the repeal of the waste levy on 1 July 2012	<p>SBA believes their needs to be an integrated policy and regulatory framework for waste management and resource recovery in today's Australia. The overarching aims are to generate less waste, to reduce the amount of waste for disposal to landfill, to manage waste as a resource, and to ensure safe and environmentally sound waste treatment, disposal, recovery and reuse. SBA supports the recommended strategies in the Commonwealth Government's National Waste Policy 2009 and the Implementation Report 2011. Both the Australian and overseas experience highlights that complementary policy instruments to support these objectives include:</p> <ul style="list-style-type: none">• landfill levies• national and / or State based resource recovery targets and objectives for products and materials• extended producer responsibility programs
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	<ul style="list-style-type: none"> • purchasing polices • resource recovery infrastructure development. <p>Case studies show that setting a price signal, such as a waste disposal or landfill levy, as part of a regulatory framework, is economically efficient and environmentally appropriate. Landfill levies have produced strong results in reducing waste disposal to landfill and encourage investment by the private sector in resource recovery infrastructure.</p> <p>Most Australian jurisdictions now have some form of levy applied or scheduled for introduction on waste disposed to landfill consistent with the National Waste Policy and relevant State based waste and resources recovery policies. With targeted waste management planning and suitable complementary instruments, landfill levies could offer Queensland's householders and businesses improved robust hazard control and reduction while also delivering enhanced resource recovery and diversion outcomes in a cost efficient manner.</p> <p>SBA notes that the landfill levy is currently at \$95.20/tn in NSW and will increase by \$10/tn plus CPI until 2015/16 under the current regime announced by the NSW State Government. With the Landfill Levy set to zero in Queensland, one of the perverse outcomes is that it is becoming cost effective to transport waste from NSW to Queensland for landfill disposal.</p> <p>SBA is concerned that the removal of the Landfill Levy in Queensland will adversely impact recycling and resource recovery efforts in both NSW and Queensland. In addition, transporting waste between States increases the environmental and carbon footprint of waste management due to diesel usage, as well as heavy vehicle movements on our nation's roads that could be avoided.</p> <p>SBA therefore urges the Queensland Government to defer the passage of this part of the legislation until it has determined the barriers which need to be addressed in planning for and implementing strategic and effective resource recovery and waste management practices which could include:</p> <ul style="list-style-type: none"> • impact of current policies on recycling outcomes • analysis of environmental and financial outcomes and technologies • local involvement and implementation • clear responsibilities and cooperation between government levels • juridical and financial instruments • transparency and clear communication to the public • clarity in establishing timelines for compliance.
Remove the weighbridge requirement for smaller	SBA recommends that this amendment should also be deferred until the Queensland Government has undertaken a

waste disposal sites and extend the installation timeframes for large sites	comprehensive review of its waste data gathering processes and procedures.
Move provisions identifying waste disposal sites required to report data to a regulation to enable flexible arrangements to be developed in consultation with the waste industry	SBA supports this proposed amendment
Extend the timeframe by which local governments and state entities are required to prepare and report on waste reduction and recycling plans to allow the plans to be revised in the context of a review of the State's waste strategy	SBA supports this amendment, particularly in light of its comments above.
Reduce the administrative burden on local governments, state entities, planning entities and reporting entities	<p>SBA supports any government proposal that reduces unnecessary, inefficient and ineffective legislation or regulation.</p> <p>SBA notes that there is a paucity of data that allows policymakers to rationally manage the state's waste streams.</p> <p>SBA believes that such data collection should not be viewed as an unnecessary administrative burden but an essential economic as well as an environmental management responsibility.</p>

Should you have any questions arising from this submission, please contact myself on +61 2 9358 1800, +61 412 545 994 or andrew.petersen@sba.asn.au.

Yours faithfully,



Andrew Petersen
CEO
Sustainable Business Australia