

26 August 2011

The Research Director
Environment, Agriculture, Environment, Resources and Energy Committee
Parliament House
Corner George and Alice Streets
BRISBANE QLD 4000

Dear Sir / Madam,

Submission on Waste Reduction and Recycling Bill 2011

Please find attached Central Queensland Local Government Association's (CQLGA) submission on the Waste Reduction and Recycling Bill 2011. The comments provided in the document attached are a joint effort and feedback from our member councils namely; Banana Shire Council, Central Highlands Regional Council, Gladstone Regional Council, Isaac Regional Council and Rockhampton Regional Council.

On behalf of our member councils, the Association would like to thank the Committee for the opportunity to comment on the Bill. I hope the comments submitted will help in further enhancing the Waste and Recycling Bill which will act as a tool in securing an ongoing working relationship between the Local and State Governments.

Yours Sincerely,


Jenny Moore
Chief Executive Officer

RESPONSE TO WASTE REDUCTION AND RECYCLING BILL 2011



Central Queensland Local Government Association

On behalf of

- *Banana Shire Council*
- *Central Highlands Regional Council*
- *Gladstone Regional Council*
- *Isaac Regional Council*
- *Rockhampton Regional Council*

INTRODUCTION

CQLGA, in support of our member councils provides the following feedback on the Waste Reduction and Recycling Bill 2011.

CQLGA, in conjunction with our member councils, supports, in principal, the overall concepts of the Bill and introduction of levies to the C&I and C&D sectors and values the opportunity to provide feedback for consideration to best benefit our local community.

ABOUT CQLGA

The CQ Local Government Association is Central Queensland Councils working collaboratively for our Region:-

- To enhance the liveability of our communities
- To support excellence in Local Government Service delivery
- To advance the common interest of, and advocate for, the needs of Central Queensland

CQLGA'S KEY STRATEGY AREAS

1. Regional Planning
2. Advocacy
3. Strategic Communications and Promotion
4. Strategic Project Coordination
5. Relationships and Partnerships
6. Research / Support in Regional Policy

The CQLGA Member Councils are:

- *Banana Shire Council*
- *Central Highlands Regional Council*
- *Gladstone Regional Council*
- *Isaac Regional Council*
- *Rockhampton Regional Council*

A key project of the CQLGA is the Central Queensland Waste Management Strategy (CQWM). The implementation of the strategy has been an integral part of the CQLGA since 2003 with many successful projects implemented across the region in a collaborative process with member councils.

IDENTIFIED ISSUES AND ACTIONS

PAGE NO	CHAPTER	SECTION	HEADING	RECOMMENDATIONS / COMMENTS / FEEDBACK
22	1	2	Commencement	<p>Haste of implementation CQLGA has concerns about the haste in which this Bill is being implemented, especially as the updated Regulation associated with this Bill are not available for review.</p> <p>This delay causes councils undue stress, and puts at risk the overall implementation - especially those without the capacity to dedicate staff to adequately review, understand and implement components related to the bill and associated legislation..</p> <p>CQLGA requests on behalf of its member councils, a delay in the commencement date for an additional 6 months to 1st July 2012.</p> <p>The following examples relating to the Bill both individually and collectively, support the above request to delay the implementation of the Bill.</p>
38	3	28	Application for approval of waste as exempt waste	<p>Materials for operational purposes Under this section, Councils have to apply for the exemption for progressive capping, batter construction, final capping, profiling and site rehabilitation. However, this leaves materials that will be used for operational purposes still liable to attract a levy. This could cause councils additional costs that have not been budgeted for.</p> <p>For example, if this is not amended, day cover soil would attract a levy. In Rockhampton Regional Council, at their Lakes Creek Road landfill, they bring in between 1200 to 2000 tonnes of soil per week for day cover. Incurring a levy for this would add an additional cost of between \$42,000 to \$70,000 per week for this council – an annual average cost of \$2.9 million that councils have not budgeted for.</p> <p>Does each council have to apply for each landfill separately?</p> <p>CQLGA requests on behalf of its member councils that materials that operational works, such as day cover soil or crushed concrete be included in Section 28 to allow councils to apply for exemption for resources being utilised in the operations of the landfill.</p>

PAGE NO	CHAPTER	SECTION	HEADING	RECOMMENDATIONS / COMMENTS / FEEDBACK
46	3	41 (3)	Remitting waste levy amounts to State	20% interest Should the "20%" interest payable on unpaid Levies be in the Bill or in the Regulations?
47 50	3	42 44	Weighbridge requirement provision	This section refers to two sizes of waste sites, which are: 1. more than 10,000t waste per year; or 2. more than 5,000t, but less than 10,000t of waste per year. In the Bill, the definition of a small sites is: "a levyable waste disposal site the operator of which is required to hold a registration certificate for the disposal of 2000t or less of waste in a year at the site". S44 requires that: The operator of the site must ensure the waste is measured and recorded in compliance with the weight measurement criteria prescribed under a regulation. While S297 allows for a temporary relaxation of the requirement to measure and record waste under section 44(2), this leaves a grey area for sites between 2,000 and 5,000t of waste per year where no weighbridge is required, but no exemption or temporary relaxation is provided either.
209	15	277	Application for discounting of waste levy amount	CQLGA, on behalf of its member councils, seeks clarification as to how sections 42 and 44 would apply to landfills between 2,000t and 5,000t – does the regulations help to define this better? Residual waste from MRF Central Queensland councils have undertaken a joint contract for the processing of CQ's domestic recycling at a newly constructed Material Recovery Facility (MRF). While it is understandable that commercial recycling delivered to this facility incur a levy, applying the levy to the domestic stream will add undue costs to councils who are already paying for the collection and processing of these resources. It is also a disincentive for Councils to continue with recyclables processing.
213	15	286	Application for approval of residue waste as exempt waste for transition period	Currently, councils from Regional Queensland are already paying a much higher price for processing of recyclables than those councils in metropolitan areas. This added burden of cost to regional councils needs a higher exemption applied.

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219	15	295	Volumetric survey of levyable waste disposal site before waste levy commencement	<p>Volumetric Survey of landfills To have volumetric surveys on each active landfill cell and all stockpiles at each waste site within a period fourteen days immediately preceding 1 December 2011, is not considered adequate time for the all surveys to be undertaken.</p> <p>Most larger sites undertake these surveys on a regular basis, however, as this will now also include all sites over 2,000t per year, there is concern, especially in regional areas, that the timeframe of fourteen days may not be able to be met due to lack of availability of qualified personnel to undertake the surveys.</p> <p>CQLGA, on behalf of member councils, request that the timeframe for volumetric surveys be extended for those landfills that do not currently conduct regular surveys.</p>


Signed

Jenny Moore
Chief Executive Officer
CQLGA