



Research Director
Environment, Agriculture, Resources and Energy Committee
Parliament House
George St
Brisbane 4000

2 September 2011

Submission on Waste Reduction and Recycling Bill

Queensland Conservation (QCC) welcomes the opportunity to provide comment on the Waste Reduction and Recycling Bill 2011.

QCC has welcomed the Waste Strategy and its associated legislation to reduce waste and increase resource recovery in Queensland. We support the introduction of a waste levy by 1 December 2011.

We regard the State Government approach to waste and resource recovery as a step in the right direction, despite the fact that we believe that the strategy could have gone a lot further with its resource recovery agenda.

Queensland is starting from a low base and is well behind many other States in resource recovery. We have estimated that over \$350 million in resources are wasted in landfills in Queensland every year (State of Waste Report 2007-Boomerang Alliance/QCC).

QCC has adopted 'a suck it and see' approach to the current programs and associated legislation. We have accepted that Queensland business, government and community needs time to adjust and catch up with best practice and, indeed, with other jurisdictions.

This act represents a start and we look forward to it enabling DERM to deliver upon its agenda according to its stated schedule, to embark upon a program of project delivery and to fully monitor and assess progress against the stated targets of the strategy. These include 65% recovery of MSW waste by 2020, 60% recovery of C&I waste by 2020 and 75% recovery of C&D waste by 2020.

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Specific Commentary on the Act

1. The Waste and Resource Management Hierarchy begins with the precept of waste avoidance. It is a core principle of effective resource management. The Objects of the Act include:

(a) To promote waste avoidance and reduction and resource recovery and efficiency actions;

In describing the Waste Hierarchy, the Act contradicts usual practice in favour of a principle to *Reduce and Avoid unnecessary resource consumption and waste generation*. However, Reducing waste is NOT avoiding waste; they are two separate functions. The hierarchy must include waste avoidance as its first principle. We propose a minor re-phrasing so that avoidance and reduction are recognised as separate.

1. Avoid unnecessary waste generation
2. Reduce unnecessary resource consumption

2. We support the polluter pays and product stewardship principles outlined.

We are pleased to see the inclusion of a *whole of life cycle management approach*. Any product stewardship schemes must include requirements to eliminate or minimise virgin materials and toxic content during the manufacturing stage, even if overseas. This replicates the practice of the EU and other jurisdictions that impose standards for products and materials entering their markets. Without such a stipulation, there is real danger that Queensland will become the dumping ground for obsolete or outdated products.

3 We strongly support the introduction of a waste levy. We believe that all sectors responsible for the generation/collection of wastes should be subject to the levy; currently the municipal sector has been exempted.

QCC supports the exemption of charitable and not for profit organisations from the levy, where donated products and materials cannot be used or where materials have been collected as part of clean up operations or from illegal dumping incidents.

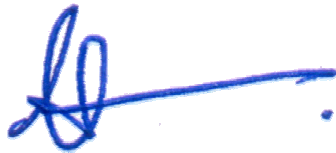
There does not appear to be any provision for its strategic or reactive increase. This is not consistent with the practices of other jurisdictions and certainly removes a significant strategic opportunity to increase pressure upon recalcitrant sectors.

With a shared border with NSW, with an existing disparity between levies and the prospect of further increases in NSW levies, there is a danger that, without the ability to increase the levy, that cross border wastes could increase in the future.

4. We have supported the introduction of a phase out of single use plastic bags. It is extremely disappointing that the program designed to address this process, which existed in the preliminary draft of the bill, has been completely removed. This program should be reinstated.

5. We support requirement of a review of the waste management strategy within two years of the introduction of the bill. A full and proper review must assess progress against the waste reduction targets and the performance of sectors, particularly those in receipt of public monies, in delivering outcomes.

We support a review of the efficacy of the levy in this same time period. This review should include the periodic/strategic increase of the levy and the inclusion of all sectors being subject to the levy.

A handwritten signature in blue ink, consisting of a stylized initial 'T' followed by a long horizontal stroke.

Toby Hutcheon
Executive Director