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TAS:TAS

2 September 2011

The Research Director  
Environment, Agriculture, Resources and Energy Committee  
Parliament House  
George Street  
**BRISBANE QLD 4001**

Via email: [earec@parliament.qld.gov.au](mailto:earec@parliament.qld.gov.au)

Dear Sir/Madam

**RE: SUBMISSION TO THE REVIEW OF THE *Waste Reduction and Recycling Bill 2011***

This submission is in response to the *Waste Reduction and Recycling Bill 2011*, and relates primarily to the waste levy that is proposed in the Bill. Western Downs Regional Council remains concerned about the substantial cost of administering this levy on behalf of the State, and we note that for some years there has been resistance to such a waste levy with good reason.

Council continues to object to this mechanism and predicts substantial problems with the administration of the levy in our local situation.

#### ***Councils Current Waste Strategy***

Following amalgamation, Council undertook a review of its waste infrastructure strategy, and had developed a short, medium and long term approach to improving our waste infrastructure. Council's infrastructure strategy recognised that in waste management terms, one size does not fit all and the significant geographical spread of communities throughout the Western Downs Regional Council area required a number of facilities to be provided at a number of locations.

For almost 18 months, Council has been implementing this strategy in a considered, measured and affordable fashion, and communicating this strategy to our local community.

Whilst it may appear on face value that further rationalisation of some disposal facilities could occur, in practical terms, there is little opportunity to do so due to the already substantial travel distances between many of our communities and their closest disposal facility.



Although in its early stages of implementation the strategy has already redirected a significant amount of waste from being disposed at landfill. Council has introduced waste minimisation and diversion initiatives, industrial waste recycling, greenwaste recycling and the extension of kerbside recycling programs to an additional 2000 properties.

Council remains concerned that the waste reforms proposed in the bill will necessitate a radical departure from the Council's current strategy, which will be met with a negative response from our local community members. This may lead to a substantial increase in illegal dumping.

### ***Community Attitudes to Waste Management***

It is acknowledged that some former Councils and members of the community historically had a poor attitude towards waste management, and may not have embraced change. Western Downs Regional Council has made significant progress in improving the community's attitude as a result of our sound infrastructure and service strategy.

Council is currently preparing to develop a 'soft' waste strategy addressing non infrastructure related issues such as waste reduction targets; economically viable recycling programs; and, public awareness and education.

As part of the 2009 infrastructure strategy, Council communicated its position to the community in relation to waste disposal sites. In summary, this strategy advised that current landfills will continue to be operated until they achieve capacity (i.e. no forced closures), with significant operational improvements occurring.

Council's strategy has been met with general community acceptance. Council's strategy has been central to improving the community's attitude towards waste management, which Council feels may be jeopardised by reform that is too radical.

### ***Capital Upgrades Required.***

Council has commenced work on a review of its waste management strategy, developing modelling to detail the costs associated with becoming levy ready. The latest modelling indicates that the additional capital upgrades required as a result of this levy will cost Council as much as \$3.179m - this includes items such as weighbridges and fencing to better secure sites and allow proper recovery of the levy, but also items like extension of electricity to these sites to power weighbridges and new on site amenities.

There is little need at present to secure many of Council's landfill sites, but following the introduction of the levy, there will be a significantly greater risk of patrons entering the site after hours to avoid the levy and therefore a substantially greater need to secure these facilities.

It is important to note the costing excludes any developments that were proposed in Council's original waste infrastructure strategy, such as a new regional landfill. It is fair to say that these other replacement infrastructure projects were approaching the limits of Council's financial capacity.

The Council has little capacity to fund these additional levy related upgrades out of its current budget; Council is appreciative of the funding already provided by DERM for one weighbridge and some data capturing devices but more funding is required prior to the commencement of the levy. It is noted that much of the levy proceeds will be re-invested in waste management in coming years through the proposed 'Waste Avoidance and Resource Efficiency' (WARE) and the 'Sustainable Futures Fund' (SFF) programs, however, this funding is not retrospective and substantial upgrades are required now, prior to the commencement of the waste levy, not afterwards. As an alternative to the current funding proposals, funding could be made available by bringing WARE and SFF funding forward.

Council therefore requests that capital upgrade grants be brought forward (prior to the commencement of the levy) to cover the full \$3.179m costs of capital works required to prepare for the levy.



### ***Administrative Costs***

The additional administration costs are expected to be substantial; the costs of part time supervision of some twelve busier landfills, regular audit at ten other smaller sites to determine the quantity of waste subject to levy, data recording devices, collection costs and levy administration generally are expected to cost in excess of \$650,000 annually. Council has little capacity to fund these additional recurrent costs; furthermore, it is likely to be difficult to be able to recruit for any additional positions in the local area due to very low unemployment rates.

Even where a remote site is fenced, and has devices in place to prevent entry of larger vehicles which may contain Commercial & Industrial (C&I) waste, there will be a cost to Council to monitor these sites and account for the levy, as C&I or Construction & Demolition (C&D) waste may still enter the site on smaller commercial vehicles, such as utilities.

### ***Regional Disadvantage and the Cost to the Community***

For many of our community members, the levy will place additional cost pressures upon them; greater than that felt by residents in more metropolitan areas.

There are some commodities, such as scrap ferrous metals, that can be economically recycled when stored in reasonable quantities. The recycling of these products is well established, and is already occurring.

It is acknowledged that in metropolitan areas, the levy 'price signal' is likely to mean that industry will choose greener options, which are well established in South East Queensland and which they already have ready access to, such as recycling or other waste treatment options. The same affordable options are not yet established in regional areas; the cost of establishing such operations is considerable and with lower volumes, and significant travel distances, is unlikely to be cost effective for some time.

For example, Western Downs Regional Council has found that access to mobile concrete crushers has been extremely limited, with most operators being located within South East Queensland. The down time associated with travel from those areas to the Western Downs makes our area extremely unattractive to those operators, and as a result, the costs are significantly greater. Council was advised in 2009 that concrete crushing costs \$11.30 per m<sup>3</sup> in Toowoomba, with the 'establishment' costs ranges from \$2800 to \$5500.

A recent concrete recycling exercise by Western Downs Regional Council in mid 2009 found only one operator who was prepared to provide a quotation to recycle concrete in Dalby (which is Western Downs Regional Council's most eastern centre). Other contractors from South East Queensland were not prepared to travel to Dalby to undertake this work. The concrete recycling cost Council \$30.30 per m<sup>3</sup>; even at that rate, the actual cost was significantly greater and the contractor did not complete the work due to unexpected costs. The costs are expected to be even greater where the volumes are less and the travel distances are greater, such as smaller, remote sites to the west of the Council area.

### ***Potential For Increased Illegal Dumping***

Council is greatly concerned about the potential for the waste levy to significantly increase the amount of illegal dumping. Across the Council area, with many bushland areas, illegal dumping is already a serious issue and may get worse.

The Council is working to change community behaviour, by commencing litter and illegal dumping campaigns, and has been fully pursuing littering offences where evidence can be sought. But unlawful disposal continues to be a problem, especially in our more remote areas, where there is little ability for proper surveillance.

To illustrate, Council is aware of recent illegal dumping of an industrial type waste (pallets, plastic wrappings) that occurred within 100 metres of a rural/regional landfill, which is open to the public 24



hours per day. No evidence providing identifying details was able to be found upon investigation. Under a waste levy regime, this poor behaviour is expected to increase significantly where facilities are either rationalised or there is a greater cost associated with proper waste management.

The situation is expected to get much worse once the levy is applied, and Council expects that increased illegal dumping will have serious environmental, operational and financial consequences.

### ***Additional Burden on Councils Operations***

The requirements of the Bill in relation to Council's operations are in many respects excessive.

The application of the levy to soil materials imported for cover purposes is considered inappropriate, even with the complicated 6% rebate that is proposed. At many landfills throughout the State, material has to be imported for proper daily cover and capping, and to charge the levy for this cover material is unfair and unreasonable.

The requirements for each active landfill cell and all waste stockpiled to be subject to regular volumetric survey (conducted by a licenced surveyor) as proposed in the Bill is excessive. A recent locating survey (May 2011) at one landfill facility cost Council \$7,300. Council has 22 facilities that would require regular survey.

### ***Conclusion***

Whilst the aspirational waste minimisation goals within the proposed bill are applauded, the methodology to achieve such goals through a waste levy is considered inappropriate for our local situation. Furthermore, the levy will be extremely expensive to implement and administer. Therefore, Western Downs Regional Council continues to object the introduction of a waste levy as it is currently proposed within the Waste Reduction and Recycling Bill 2011.

As an example of an alternative to the levy, Council's current waste infrastructure strategy was implemented in 2009 and has already resulted in a substantial amount of waste being diverted from landfill.

The introduction of a waste levy will force Council to radically depart from its current strategy, either to significantly invest in infrastructure and operations associated with the collection of the levy, or to close some sites. Either option is likely to be met with a significant negative reaction from the Western Downs community, and a worsening of environmental outcomes in terms of illegal dumping.

Should the levy remain in force, Council again reinforces the need for the State to fund all necessary capital upgrades required as a result of the reforms to a total of \$3.179 million, and for this amount to be made available to Council prior to the commencement of the levy. This could be done by the State bringing forward the future proceeds of the WARE and SFF funds. Furthermore, Council requests that funding be provided to offset the costs associated with the administration of the levy.

I thank you for the opportunity to lodge this submission, and trust that the committee will give consideration to the requests and recommendations made therein. Should you require any further information on Council's submission, the Mayor of the Western Downs, Cr Ray Brown, would be pleased to make representations directly to your committee.

Yours faithfully



Phil Berting  
**CHIEF EXECUTIVE OFFICER**