



Submission to the Environment, Agriculture, Resources and Energy Committee

The National Association of Charitable Recycling Organisations

2 September 2011

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Submitted on behalf of NACRO Queensland by:
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1 About NACRO

NACRO, the National Association of Charitable Recycling Organisations, is the peak body representing a broad spectrum of charitable recycling organisations throughout Australia. The business of our members is to generate social capital through recycling activities to fund welfare programs. Indeed, millions of individuals benefit from the products, operations, and programs created by our members.

Members accept a myriad of donated goods including used clothing (textile waste) household goods, toys and books. The volumes are significant. Whilst there is little data available, through its efforts this industry diverts approximately 75 percent of the post-consumer textile waste from our landfills.

There can be no doubt of the important role these organisation plays in the community. State and Federal governments would have significantly higher social costs in addition to an unmanageable volume of landfill, the management of which would be funded through increased taxes and a massive bureaucracy.

2 Charitable Recycling Exemptions

NACRO has provided advice to the Department of Environment and Resource Management (DERM) concerning exemption mechanisms for charitable recyclers and wishes to reiterate this advice to the Committee.

The submission applies to Draft Legislation Part 2: **Identifying Exempt Waste (Section 28 (2) (a))**

NACRO welcomes the Clause which states that an "*exempt waste application*" can be made "*and must be about one of the following categories of waste* –

(a) *waste that has been donated to a charitable recycling entity but cannot be practicably be re-used, recycled or sold.*"

The following answers were provided to DERM and may assist the Committee in its deliberations in developing an exemption mechanism for charitable recyclers in relation to Section 28 (2) (a).

How a Possible Exemption Could be Implemented?

- Q.** *Should a tonnage limit apply?* It is proposed that this be based on an estimate according to the previous financial years waste disposal volumes.
- A.** No tonnage limit should apply to the first year of operation as this figure will be distorted by the inflated waste volumes. Waste disposal volumes should be recorded for exempt recyclers for the initial exemption years and be used as a benchmark to act as a base figure to implement future exemption waste volume limits
- Q.** *Should the exemption cover specific loads or valid for a certain period of time?*
- A.** The exemption should cover a specific time period, ideally 12 months, not specific loads. Specific loads exemptions would be more easily distorted and skewed by volatile weather events.
- Q.** *Who is best to receive exemption certificates? Head office, regional office, individual shops, someone contracted to remove the waste on behalf of the charity?*
- A.** Head office should be the administrative control point for the receipt of exemption certificates. Head office should make application on behalf of its constituent bodies operating in each levy council area
- Q.** *Is it reasonable to limit an exemption to waste taken to a particular waste disposal facility specified in the application?*
- A.** Where a charitable recycler uses its own transport assets to access a particular waste disposal facility this would be reasonable. It is suggested that a "master exemption certificate" be issued to an applicant and vehicle details registered for monitoring and control purposes. Charitable recyclers who use outsourced transport for waste disposal may need access to more than one waste disposal facility and register the outsourced transport arrangements accordingly.
- Q.** *How many active charitable recyclers are there in Queensland? This will help provide an indication of how many applications could be received. The number of organisations and also the number of "sites" likely to apply individually?*
- A.** There are 7 major charitable recyclers in Queensland that are estimated to generate 85% of the charitable waste volume. 5 of these organisations are NACRO members with the other 2 organisations NACRO members in other states. The remaining "charitable" recyclers would be local church groups, scout groups etc. It is estimated that the 7 major charitable institutions will potentially require 73 exemptions across 22 local government levy areas

Q. Can NACRO provide data on real volumes of unsuitable donated and unlawfully dumped waste that is disposed by individual charitable recycling organisations over a period? This will provide an indication of the volumes that likely to be requested for an exemption?

A. Yes. Larger NACRO members separate data on illegally dumped waste collected from clothing bin sites and waste generated from its recycling operations. This data can be extrapolated to provide an estimate of state wide volumes of illegal waste based on their share of the state's total charitable waste figure

John Hillier

A handwritten signature in black ink, appearing to read 'John Hillier', written in a cursive style.

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