



19 September 2018

Committee Secretary
Innovation, Tourism Development and Environment Committee
Parliament House
George Street
Brisbane Qld 4000

**HQPlantations Submission – Waste Reduction and Recycling (Waste Levy) and Other
Legislations Amendment Bill 2018**

Dear Committee Secretary,

HQPlantations is supportive of waste legislation reform however we are concerned that the re-introduction of the waste disposal levy will escalate an already significant illegal dumping problem in State Forests under our management.

HQPlantations is the largest forest plantation owner in Queensland following the purchase of a 99-year Plantation Licence from the Queensland Government to manage, harvest and re-grow plantation timber on over 300,000 hectares of Government-owned State Forests ranging from Cairns to the Border Range. The majority of these plantation forests are located in South East Queensland, often in close proximity to major urban populations.

The Plantation Licence requires public access to the plantations for recreation purposes be maintained. Unfortunately, public access also increases illegal activity including littering and illegal dumping. This is a widespread and significant management issue that not only impacts our business, but also affects neighbours, neighbouring communities and recreation users who seek natural, environmental and recreational amenity.

HQPlantations is concerned that the proposed regulatory changes, in the absence of a comprehensive support package for public land managers such as HQPlantations, will place additional and unreasonable imposts on our management due to:

1. Increases in illegal dumping as some elements within the community seek to avoid the waste management levies by dumping material in the plantations; and
2. Increases in costs associated with plantation clean up and associated significant increase in disposal charges incurred by HQPlantations for this illegally dumped material.

Illegal dumping is a significant issue in plantation areas, particularly those in close proximity to urban centres. To demonstrate the scale of the problem, please see the attached summary of illegal dumping in our Coastal region (one of three regions in our estate). A study conducted by the Department of Environment and Science's Litter and Illegal Dumping Unit (LIDU) recorded 698 separate illegal dump sites in the survey area along a subset of plantation roads in nine of 28 logging areas in the Beerburrum plantations. More information about this study can be found in the following DES reports:

- Beerburrum Forest area: Reducing illegal dumping in natural areas

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- Griffith University EHP Project Summary: Elicitation and Statistical Modelling of Effectiveness of Signage Interventions on Illegal Dumping in the Beerburrum Forest area.

The problem is expected to escalate with 50,000 new homes to be constructed on the immediate northern boundary of the Beerburrum plantations within 20 years, with a potentially similar housing increase to the immediate south.

Managing illegal dumping imposes considerable financial impacts on HQPlantations as not only do we incur the costs of waste removal, we also incur local government dump charges associated with disposal in most cases.

Further, illegally dumped vegetation and rubbish (including regulated waste) not only increases environmental and fire risk, dumped regulated waste can also expose our staff and contractors to health and safety risks.

HQPlantations is committed to good forest stewardship and in an effort to combat illegal dumping, we continue to develop, support and invest in strategies and initiatives including:

- Working closely with the LIDU to promote responsible behaviours and prosecute dumping offenders. We have invested significant financial resources in surveillance and evidence collection to support LIDU prosecutions. Whilst prosecution is often successful, HQPlantations receives no restitution yet the cost to appropriately dispose of the waste is often incurred by HQPlantations.
- Developing relationships with local government authorities and working collaboratively to combat illegal dumping
- Coordinating annual Clean Up Australia Day events with local recreational forest users.

We are concerned that as a consequence of changes being proposed, any recent gains in this area will be lost unless the Government develop and fund a support package for HQPlantations and other public land managers to address the cost and management impacts of the inevitable increase in illegal dumping post the introduction of any new waste management levy regime.

Yours Sincerely,



David West
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ATTACHMENT: Summary of Illegal Dumping in HQPlantations Coastal Region

Litter and illegal dumping within the Plantation Licence Area (PLA) presents significant management and economic issues for HQPlantations. In addition to obvious aesthetic impacts to the forest landscape, illegal dumping contributes to environmental degradation, increases fire risk, diminishes forest values and recreational experiences and requires significant resources to dispose of waste and undertake remedial action to repair environmental impacts.

Continued illegal dumping promotes negative social norms and community perceptions of the forest. An environment that is perceived to be uncared for often leads to more dumping, other illegal activities and antisocial behaviour such as hooning, destruction of the plantation road network and arson.

Approximately 90% of illegal dumping activities in HQPlantations Coastal Region occurs within the Beerburum State Forest, an area that presents a large isolated greenscape with multiple access points, a good road and trail network and increasing pressure from urban encroachment.

The data below highlights reported dump sites in HQPlantations PLA. Waste includes building rubble, household rubbish, tyres, furniture and appliances, green waste, asbestos and other hazardous materials including chemical and medical waste. **Expenditure associated with the disposal of waste is in excess of \$30k per year.**

YEAR	ASBESTOS SITES	OTHER HAZARDOUS MATERIALS	NON- HAZARDOUS MATERIALS	TOTAL	TONNE ESTIMATE	REPORTED TO LIDU FOR INVESTIGATION
2011	20	45	354	419	83.8	
2012	30	6	74	10	22	
2013	19	15	25	59	11.8	63
2014	10	13	26	49	9.8	58
2015	5	7	39	51	10.2	35
2016	6	1	21	28	5.5	27
2017	1	1	9	11	2.2	6
2018	1	1	8	10	2	3
	91	89	556	637	147.3	192

Dumped and abandoned vehicles are widespread throughout HQPlantations estate, although hotspots in close proximity to large urban communities such as Beerburum and Wongi (north-west of Maryborough) account for a majority of the cases.

Expenditure associated with the removal of

vehicles from the estate can range between \$20k and \$30k per year.

YEAR	VEHICLES FOUND	BURNT	% BURNT
2010	148	94	63.5%
2011	159	62	39.0%
2012	162	88	54.3%
2013	175	105	60.0%
2014	172	111	64.5%
2015	45	40	88.9%
2016 - 2017	124	88	70.9%
2017 - 2018	135	92	68.2%
	1,120	680	

HQPlantations coordinates annual Clean Up Australia Day events, with support from local councils with a view to target and dispose of rubbish from a hotspot or area of concern in addition to

engaging with Landcare and recreation groups, empowering these groups as unofficial custodians of the land.

Data below represents the waste removed during Clean Up events.

YEAR	NON HAZARDOUS (t)	TYRES (t)	TOTAL TONNE	LOCATION
2014	36	1.5	37.5	Beerburum + Ringtail (north of Tewantin)
2015	5.5	1	6.5	Beerburum
2016 - 2017	32	4	36	Beerburum + Wongi (Maryborough)
2017 - 2018	15	4	19	Beerburum
	88.5	10.5	99	