

Justice and Other Legislation Amendment Bill 2026

Submission No: 010

Submission By: Waste, Recycling Industry Association (Qld)

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18 March 2026

Justice, Integrity & Community Safety Committee
Queensland Parliament House
2A George Street
BRISBANE QLD 4001
Via email: jicsc@parliament.qld.gov.au

***Re: Submission on the Justice and Other Legislation Amendment Bill 2026 –
Impact on the Queensland Metal Recycling Sector***

Dear Ms Denny,

Thank you for the opportunity to provide a submission to the Justice, Integrity and Community Safety Committee regarding the Justice and Other Legislation Amendment Bill 2026.

WRIQ represents 100 Queensland businesses ranging from multinational operators to small, family-owned organisations that deliver essential services to every community in the state. Our members manage 97% of Queensland's waste collections, support 16,000 Queensland jobs, contribute \$2.7 billion to Gross State Product and operate \$3.8 billion in essential waste recycling infrastructure across Queensland. Our membership includes all five metal recyclers doing onshore processing of recyclable metals in Queensland as well as numerous other legitimate, licensed metal recycling businesses.

As the peak body representing waste recycling businesses in Queensland, we wish to commend the Crisafulli Government on delivering a comprehensive suite of reforms for metal recyclers as part of this Bill. Rather than submitting to political pressure to ban cash payments for scrap as has been done - with no effect - in other States, the Queensland Government has instead taken a different and far more effective regulatory path. By focusing on extreme penalties and rigorous, specific identity verification rather than blanket "no cash for scrap" schemes, this Bill strikes a balance that supports legitimate recycling businesses while ruthlessly targeting criminal activity. This Bill also incorporates all the changes that we have been requesting for the last 15 years to ensure that the legislation for scrap metal recyclers is robust and fit-for-purpose.

Requirements in relation to scrap metal recyclers have been thoughtfully and sensibly worded, taking into account the feedback we provided to the recent Parliamentary Inquiry into Scrap Metal Theft. In particular:

- **Distinct Treatment of Scrap Metal:** The Bill's move to simply separate scrap metal from other second-hand goods is a major step forward. This removes the historical ambiguity that has long plagued the sector because the sheer volume, condition and type of materials being received makes it not feasible to record every serial number from every item. The photos below show typical items received by a scrap metal recycler:

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- **The "No Cash for Scrap" argument:** WRIQ strongly supports the decision not to stop cash payments. Many governments see this as a bandaid solution to the issue of metal theft, without understanding that the problem is limited enforcement of existing regulations and that banning cash simply sends the illegal operators further underground, making it even harder for enforcement agencies to police.
- **Operational Efficiency (The 7-Day Rule):** Defining scrap metal as 'other than nominated property' removes the need to hold material for 7 days which is virtually impossible to achieve in a high volume metal recycling business.
- **Exclusion from Impractical Requirements:** Excluding scrap metal from 'second-hand property' definitions removes the need to comply with Section 6 (c), (d), and (e). These requirements were physically impossible to achieve in a scrap metal context.
- **Strong Deterrents:** The significantly higher penalties specifically for breaches in the scrap sector are welcomed by industry. A legitimate, compliant recycler will have no issue with these changes, and they provide the necessary "hammer" to shut down unlicensed operators and illegal activity.

While the Act amendments are a promising start, it is critical to note that no metal recycler can comply with the current Regulations as they are written. WRIQ would appreciate the opportunity to ensure that industry experts are involved in development of the Regulation to ensure the new rules are operationally viable for the contractors doing Queensland's essential recycling work.

We look forward to ensuring that Queensland continues to lead the way in smart, effective waste recycling regulation with appropriate enforcement to prevent illegal activity and unlicensed operators.

Yours sincerely,



Alison Price
Chief Executive Officer