



Queensland Environment Protection Agency  
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Brisbane  
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21 December 2007

### **Submission to Queensland Waste Strategy Discussion Paper**

Queensland Conservation Council (QCC) and its member groups welcome the opportunity of commenting on the *Lets Not Waste our Future Discussion Paper*, released by the Queensland EPA.

We would also like to take the opportunity of congratulating Minister Andrew McNamara's commitment to developing and releasing a draft waste strategy in 2008.

In a recent report *The State of Waste in Queensland* by the Total Environment Centre it was estimated that only 27% of materials discarded in Queensland were recycled. As a result, over \$350 million in otherwise useful resources are wasted in landfill every year.

It is self evident that the recovery of these wastes is as much an economic and social issue as it is an environmental one.

In a regionalised state such as Queensland, resource recovery represents a significant regional opportunity. A waste strategy in Queensland should correct both the wasteful culture that exists in Queensland, and also encourage the opportunities presented by a resource recovery approach.

### **Key Considerations for a (Waste) Strategy**

Currently, Queensland is a wasteful society. Most products and resources are used once and then discarded in landfill as mixed wastes. A (waste) reduction strategy must recognise that improved outcomes can only be achieved by abandoning current wasteful practices and behaviour. Queensland must adopt a closed loop system to managing its waste. This is best described as a *cradle to cradle* approach.

1. Any proposed (waste) strategy should focus upon the avoidance of waste in the first place, and then focus on the management of any wastes as re-usable resources. We support the application of the waste hierarchy (with avoidance at the top of the hierarchy) to guide this approach.
2. We believe that the goal of a (waste) strategy must be to achieve a zero waste outcome
3. We support a *whole of system* strategic approach, with full lifecycle resource assessments, as the pathway towards achieving a zero waste goal. Without such an approach it is not possible to effectively manage or strategically intervene to achieve a zero waste (or waste reduction) outcome.
4. Zero waste (or waste reduction) can only be sustained by combining an informed and educated society, with appropriate services and an active and viable resource recovery market. Any of these options, adopted in isolation, will fail to meet strategic outcomes.
5. Any effective strategy must incorporate clear policy direction and timetables, and provide sufficient funding to ensure that outcomes are achieved

### **Comments on the *Lets not waste our future Discussion Paper***

#### **Targets and Bans**

We believe that the proposed Waste Strategy become a Zero Waste 2020 Strategy or Waste Avoidance and Resource Recovery Strategy (with a zero waste 2020 goal). The zero waste goal has been adopted in South Australia, as a genuine policy outcome and establishes a very clear agenda.

In many other jurisdictions, reduction targets have been set (eg. 60% reductions by 2014). This approach begs the question; what is the next target? A zero waste approach clearly sets out the ultimate goal of the strategy.

A milestone reduction target should be set, within a zero waste goal. We suggest a 60% target by 2014, across all waste streams. This is comparable to most other jurisdictions.

We believe it is entirely appropriate to ban dangerous and toxic materials from landfill. However, it is equally important to provide alternative collection and disposal options for these materials.

We believe that a continuous improvement policy that bans and excludes other materials from landfill should also be considered. Effective resource recovery is often predicated upon homogenous streams of materials, so the exclusion of materials likely to contaminate these streams and prevent their economic recovery, is required.

Plastic bags and other items are currently prohibited in kerbside recycling for these very reasons. A similar practice in other waste streams to support more resource recovery makes good sense and will act to incrementally improve strategic performance.

## **Data Gathering**

As the State of Waste in Queensland Report outlines, and as most waste industry professionals have noted, figures on Queensland's waste profile are inaccurate, and most probably understated.

As part of a proposed strategy, an accurate accounting system must be developed and introduced.

## **Levies**

We support the introduction of a landfill levy, as long as that levy is predominantly used to fund waste avoidance and resource recovery. Levies have too often been directed into general State government coffers, we support levies being hypothecated so that the principal beneficiaries are local government (for investment in avoidance and resource recovery programs).

We believe that a levy of, at least \$50 per tonne, be imposed.

We also recognise that, because a tonnage charge does not necessarily encourage the recycling of lighter or problematic wastes, other initiatives should be introduced to supplement a levy. Advanced recycling fees, for instance, would support the collection and recycling of mobile phones, waste oil and electronic wastes.

## **Container Deposit Legislation**

Container deposits systems can have significant benefits for recycling and litter prevention. Such systems should be considered as one option in a waste strategy.

We note that the Hyder Report on Container Deposit Legislation has not been publicly released. Despite this, some conclusions from the report have been used in the discussion paper. As a result, the discussion paper departs from its purpose as a discussion paper, and offers a **position of opposition** on CDL. This is inappropriate.

In a recent presentation on some of the conclusions from the Hyder Report, it was brought to the QCC's attention that some of the figures used in the report misrepresented the facts and seemed designed to support a particular point of view on the issue. We believe that the report is tarnished by the chief authors close association with the beverage industry.

Because the Hyder Report has not been publicly scrutinised or challenged, QCC believes it is inappropriate to use its findings as a part of the discussion paper. We

strongly urge that the EPA discount any conclusions from the Hyder Report and maintain an open mind on the potential of CDL in Queensland.

CDL should be fully and properly considered as part of a broader agenda on extended producer responsibility. The Hyder Report should be publicly released as part of that consideration.

### **Extended Producer Responsibility**

Extended Producer responsibility (EPR) or Product Stewardship is an extension of the polluter pays principle. Its implementation can directly influence the design of products and simultaneously support arrangements to collect and recover discarded products.

QCC supports EPR because it promotes the integration of lifecycle environmental costs and establishes a closed loop system of product use, recovery and re-use.

QCC believes that there are a number of problematic materials to which EPR could and should be applied these include:

- Electronic waste
- Tyres
- Used oil
- Gas cylinders
- Lead acid batteries/ nickel cadmium batteries
- Household hazardous materials (paints, cleaners, pesticides etc)

One of the key issues associated with EPR and range of household discards is the need for an effective collection system. QCC believes that the notion of a network of drive thru recycling centres should be considered as an option. The Western Sydney Waste Board developed such a concept. In fact, the Queensland EPA was involved in promoting the concept in the late 1990's as an option for the State. QCC is able to help in the provision of further information and background on Drive Thru Recycling Centres.

### **Pay as you Throw**

QCC supports PAYT in principle. However, there are a number of unresolved issues with the concept. Most obvious is the application of such a system for residential units, for areas of high tourism and for rental properties.

We consider that this issue might be better addressed by local government as part of its strategic approach to improving its waste services.

### **Zero Waste Agency**

QCC supports the establishment of a Zero Waste Government agency in Queensland. The SA Government has established a Zero Waste Authority which stands as a good possible model for this state.

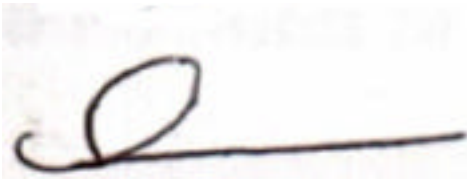
The purpose of the agency would be to proactively support and fund programs that extend and improve strategic performance, within the context of achieving a zero waste goal. The agency should be a well resourced advocate.

### **Climate Change**

Climate change has a clear bearing on this strategy. According to AGO figures, about 2% of Australia's greenhouse gas emissions come from fugitive emissions from mixed landfill. However, improving recycling and resource recovery rates coupled with methane capture can provide additional greenhouse abatement. It has been estimated that a further 5% in abatement savings can be made.

Measures that reduce greenhouse gas emissions from landfill and reduce waste will complement both climate and waste reduction goals.

Regards,

A handwritten signature in dark ink, appearing to read 'Toby Hutcheon', is written over a faint, illegible stamp or watermark.

Toby Hutcheon  
Coordinator  
Queensland Conservation Council