

9 December 2022

Department of Climate Change, Energy,
the Environment and Water
GPO Box 3090
Canberra. ACT 2601

Via email: ExportWaste@awe.gov.au

To Whom It May Concern

Re: Regulation of Waste Exports: Cost Recovery Consultation Paper, November 2022

The Waste and Recycling Industry of Queensland (WRIQ) is the unified voice of waste management and resource recovery in the State. Representing more than 90 Queensland-based organisations ranging from multi-nationals through to small family owned and operated businesses, WRIQ engages in a broad range of state-specific issues of strategic importance to the sustainability and development of the waste management and resource recovery sector.

WRIQ represents all aspects of the sector including major landfills, transfer stations, resource recovery facilities (including advanced manufacturing), firming power facilities and collection services. WRIQ's mission is to elevate the waste management and recycling industries through services, education and advocacy for members to achieve successful economic, social, environmental outcomes.

Background

WRIQ notes that the consultation paper describes how the Department of Climate Change, Energy, the Environment and Water proposes to achieve cost recovery for the processed waste exports scheme from 1 July 2023. WRIQ understands that the department seeks feedback on the proposal from all participants and stakeholders in the waste and recycling export sector. We also note that the department is consulting on two fee options and a levy model.

Response

The Queensland sector acknowledges the value proposition of having a central registration portal to record all companies exporting materials and the volumes of those materials. We also support the Government's initiative that all recycling commodities for export should be processed to agreed quality standards and be free of non-recoverable materials (waste).

However, we express our significant concern at a range of elements contained in the Consultation Paper including, but not limited to, increasing commodity characterisation and quality criteria beyond the current market quality specifications; as well as the impost of a flawed cost-recovery and levy model which has not received proper rigour or consultation and appears to be materially inefficient.

WRIQ is concerned that the approaches outlined in the Consultation Paper will lead to unintended consequences, including the domestic disposal of internationally demanded materials as well as an unnecessary financial impost on the sector.

We note that the National Waste and Recycling Industry Council has provided a detailed response (dated 8 December) and have met directly with key Departmental staff to articulate industry's concerns.

If you require any further information, please do not hesitate to contact me at georgina@wriq.org.au or on mobile 0450 296 240.

Yours faithfully



Dr Georgina Davis
Chief Executive Officer