

9 April 2019

Office of Resource Recovery
Department of Environment and Science
GPO Box 2454
Brisbane Qld 4001

via email: wastepolicy@des.qld.gov.au

Re: Draft Queensland Waste Management and Resource Recovery Strategy

The National Waste Recycling Industry Council (NWRIC) is the national peak body representing waste and recycling businesses. We work to improve waste and recycling services for all Australians.

Our members¹ and affiliates², service most households and businesses across every State and Territory. The NWRIC's 450 plus members range from small family-owned businesses to multi-billion-dollar global companies. They collectively own and operate nearly every private waste and recycling asset in Australia for collecting, recycling, processing and treating waste.

The NWRIC members work together and cooperatively share a vision for a fair, safe, innovative and sustainable waste and recycling industry. The NWRIC members do this by:

- transforming waste into resources for reuse or energy;
- ensuring the safe handling, disposal and treatment of non-recyclable and hazardous waste; and
- providing a safe and clean environment for the community.

The NWRIC welcomes the opportunity to comment on the [Queensland's Draft Waste Management and Resource Recovery Strategy](#).

NWRIC Response

The NWRIC welcome the engagement by the Queensland Government in the sector. This response identifies priority actions within the strategy which will advance the waste and resource recovery sector, suggested amendments to strengthen the Strategy and critical issues not addressed in the strategy which will be essential to advancing the industry.

1. Priority actions to advance the strategy

The new strategy identifies many beneficial actions. However, to advance waste and recycling services for all Queenslanders, the NWRIC believe the following key actions should be given priority;

¹ Australia's nine largest waste & recycling companies: Alex Fraser Group (Hanson), Cleanaway, J. J. Richards and Sons, Solo Resource Recovery, Sims Metal Management, Suez, Remondis, ResourceCo and Veolia.

² Waste Recycling Industry Association, Queensland (WRIQ), Waste Contractors and Recyclers Association of NSW (WCRA), The Victorian Waste Management Association (VWMA), Waste Recycling Industry Association of South Australia, Waste Recycling Industry Association of Western Australia (WRIWA) and the Waste Recycling Industry Northern Territory, WRINT.

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1.1 Harmonisation

We support the Queensland government’s commitment to working “with the Commonwealth Government to standardise waste policy, legislation, regulation and messaging.”

The NWRIC supports the Commonwealth’s National Waste Policy, however without sufficient resourcing and leadership at a National level and States agreement on targets and the action plan the policy will fail. Likewise the NWRIC recommends the Queensland strategy reflect the National Waste Policy and other State waste and resource recovery strategies to help drive greater harmonisation and successful implementation.

The NWRIC considers the following regulatory areas as a matter of priority for national harmonisation - landfill levies, transport of waste, landfill operations, recovered organic product quality and operations standards, aggregate reuse in road construction, stockpiling and fire guidelines and operation of container deposit schemes.

Consistent national community messaging on what items can go in what bin is also key to reducing contamination in household recycling bins. We encourage National, state and local governments to work with waste and resource recovery industry on streamlining these messages to reduce community confusion. WA Recycle Right campaign is a great example of how local government and recyclers have agreed to a common message for householders.

1.2 Compliance / Policing

Industry support regulatory action to “continuously improve the effectiveness of waste sector’s environmental compliance operations.” Essential to this will be strengthening the Environmentally Relevant Activities (ERA) framework, including even handed policing of licences. It is also important that both the Department and local government are adequately funded to provide guidance to industry and ensure compliance.

1.3 Planning

The NWRIC notes the existing strategy identifies a number of items when it comes to planning for waste facilities; including work to

- Develop waste precincts,
- Develop a coherent state-wide waste infrastructure planning framework and regional infrastructure plans,
- Rationalise waste facilities,
- Improve or close redundant landfill facilities, and an
- Audit landfills to test the quality of Queensland landfill infrastructure and identify non-compliance.

We commend these activities and support rapid action to implement them including strong alignment between local and state planning regulations.

1.4 Extended Producer Responsibility

The strategy makes reference to supporting product stewardship initiatives but does not identify specific products. The NWRIC calls for regulated product stewardship programs for batteries and tyres as a national priority as well as the expansion of the NTCRS to include all types of e-waste. Batteries in particular are a

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source of fires in waste facilities. There is also a need to strengthen the regulatory framework to ensure APCO meets its targets. One possible option is for State government, through its container deposit scheme, introduce mandated recycled content levels for container types.

We also encourage the government to look into restricting the use of hazardous substances in products such as fire retardants, PFAS and other harmful chemicals or heavy metals that are contaminating organics and other recovered materials, this could be something similar to the European ROHS Directive or a regulation under the Product Stewardship Act.

1.5 Procurement

In the wake of China's National Sword and Blue Sky policies, domestic procurement of plastics, glass and paper will be essential. The NWRIC recommends the Queensland Government introduce mandatory procurement targets for these materials as a matter of urgency.

Further, mandatory government procurement of recovered organics for mine site rehabilitation and urban infrastructure projects is recommended to drive the development of this industry in Queensland and diversion of organics from landfill.

1.6 Energy

We note the Queensland Government has committed to developing a;

- Clear position and policy on the role of energy and fuels from waste in Queensland, and to
- Develop and energy from waste policy.

Essential to the development of energy recovery and fuel manufacture infrastructure will be appropriate siting, community acceptance, long term contracts for supply of the materials and connection to the grid. The application of energy recovery over landfill will create jobs and improve state revenue.

The NWRIC supports the use of waste to energy technology where there are no recovery options for the material.

2. Suggested amendments to the strategy

2.0 Targets

The NWRIC supports the use of long term and milestone targets, however it considers that the waste avoidance target should also apply to the C&I and C&D waste streams as proposed by the National Waste Policy and not be restricted to the MSW stream. There is substantial action businesses can take to reduce their waste generation.

2.1 Waste Streams that require to improve recycling performance

On page 19 of the Strategy a list of problem waste is identified. There are two gaps - organics and liquid waste. It is suggested that food and agricultural waste should be modified to food and organic waste, and liquid waste added to the list.

3. Additional critical issues for action

The NWRIC considers the following issues have not been adequately addressed in the strategy and the proposed actions should be included in the Strategy to address these critical issues.

3.0 A clear roadmap for liquid waste recovery

Liquid waste is an important component of the industry. Government should create a clear roadmap for the effective capture, transport and where appropriate recovery of this stream. Appropriate policing of standards in liquid waste recovery is essential, as liquid waste is easier to illegally dump than materials.

3.1 Levy rebates to local government

Currently, 105% of the new levy is being rebated to local government. This rebate without any performance targets on councils to reduce waste generation and increase recycling rates does not encourage diversion of waste from landfill. It also means that businesses will accept the greater share of the financial burden of implementing the new levy. It is recommended the Strategy require the 105% investment of levy returned to Local Government to be invested into waste and recycling activities, and monitoring of local government performance in achieving the strategy targets. Failure to do so should result in a reduction in amount of levy rebated.

3.2 Addressing of unnecessary stockpiling and ensuring the integrity of the levy

Industry is concerned the introduction of the new Queensland waste levy may cause unnecessary waste stockpiling as a covert form of levy avoidance. We call for the new Queensland Government to ensure appropriate stockpiling controls are introduced and monitored similar to NSW as well as ensuring the responsible department is adequately equipped and funded to address this challenge.

3.3 A long term, rational levy investment strategy

The NWRIC suggests the Strategy includes a commitment to invest 100% of the waste levy into waste and recycling activities and an urgent action is to develop an investment strategy and plan that will deliver the outcomes of the strategy.

3.4 A stable and competitive regulatory environment

Regulation must be made in a manner which does not dis-incentivise private sector investment. By giving levy dividends to local government, or handing over control of waste services to local government, private sector capital will be deterred. Private investors and superfunds will not enter markets where they are competing with Government or where there is significant sovereign risk due to regulatory change.

3.5 Hazardous Waste

The strategy needs to include actions to address the safe management of hazardous waste including PFAS, Asbestos be added to the list.

3.6 An appropriate plan for organics recovery

In order to advance organics recovery, the strategy include development programs for recovered organics, consistent policing of regulatory standards and a statewide infrastructure plan for organics recovery facilities. Queensland can join the Commonwealth in leading programs to reduce food waste.

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3.7 Appropriate policing of regulatory standards

Despite the best efforts of industry and regulators, illegal dumping for commercial gain continues to damage communities. State departments and local governments must be well equipped to face this challenge, and the NWRIC advocates that Queensland adequately fund activities to stamp out this problem.

Queensland's program of licencing Environmentally Relevant Activities must ensure that licences are appropriately policed. Industry believe the lack of scrutiny in the current system is allowing poor practises to occur. Illegal or substandard facilities undermine community and investor confidence, and can raise ancillary costs such as insurance costs for operators with high standards.

With these regulatory measures in place, the waste and recycling industry is ready to create jobs, protect communities and reduce pollution for the benefit of all Queenslanders.

For further information, please contact NWRIC Secretary Alex Serpo in the first instance - secretariat@nwrlic.com.au - 0417 932 303.

Yours sincerely,



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