

# Waste strategy consultation

## Summary report



**Prepared by:**

Waste Policy Unit

Department of Environment and Resource Management

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## **Executive summary**

On 5 June 2010, Queensland Government released the draft Waste Strategy: Waste Avoidance and Recycling 2010-2020 (the draft strategy) for public consultation. The draft strategy highlighted the need to move towards a more sustainable approach to waste management, and outlined the significant challenges facing Queensland including unsustainable levels of waste generation. The draft strategy set the direction for Queensland, provided guiding principles and proposed targets, and noted the need for strengthened legislation, better data collection, a price signal to discourage disposal, and investment in infrastructure and effective programs.

During the consultation period, which closed on 16 August, 96 submissions were received and 44 stakeholder consultation briefings were held. Submissions that could be made public have been published on the Department of Environment and Resource Management (DERM) website.

Feedback from stakeholders indicated strong support for a new waste strategy and for the waste reforms generally. There was also general support for the goals and targets in the draft strategy. However, feedback from stakeholders also identified a number of issues.

Local governments and the waste and resource recovery industry emphasised the importance of providing greater detail on the proposed levy framework, definitions under the proposed legislation and levy exemptions. Submissions from these sectors also raised the need to expand recycling infrastructure so that alternatives to disposal are available both prior to the levy commencing and subsequently to ensure the ongoing ability for waste generators to choose options other than disposal. A number of submissions also identified the need to address the impediments presented by the current planning framework to expanding resource recovery infrastructure.

Some stakeholders expressed concern at the timeframes within which waste disposal facilities are expected to become levy-ready. Local government submissions particularly expressed this concern, as some facilities do not currently have the infrastructure necessary to weigh the waste presented or collect the required waste data information.

Excluding municipal solid waste (MSW) from application of the levy raised concerns. Several submissions questioned how the MSW target in the draft strategy would be met if this waste stream was excluded from the application of the levy. The potential for leakage of waste from the business sector into the MSW stream was also a concern, as was the potential impact on skip bin operators of excluding domestic self-haul waste.

The issue of better compliance to target illegal dumping and illegal resource recovery and disposal operators was raised. The waste and resource recovery sector emphasised the need for a level playing field to ensure that illegal operators are identified. Local governments, individuals and the waste sector emphasised the importance of targeting illegal dumping as there is concern that this activity is likely to increase as a result of the levy.

There were mixed reactions to the proposals to exempt certain wastes and disposal activities from application of the levy, with some sectors stating that exemptions add another layer of administrative complexity to the system. Submissions that supported exemptions stated that they should be kept to a minimum.

Most stakeholders supported introducing product stewardship arrangements. Most submissions also supported the need for consistent information from the state government and early communication of the changes, with targeted education and awareness to general business and industry, schools and the community.

While there was general support for the targets, all sectors commented on the need for stronger links between the programs, actions and the targets. There was also significant comment on the currently poor quality of data in Queensland and the need to improve data collection and reporting.

DERM greatly appreciates submitters sharing their views. The department is pleased to have received feedback from so many of its stakeholders that shows they are supportive of the waste reform agenda and a new strategy. In response to the key issues raised through consultation:

- DERM will prepare a business plan detailing the priority program areas over the next four years and the funding allocation for each program area.
- DERM commits to helping develop the National Waste Policy and national product stewardship arrangements.
- The first priority for levy funds is to strengthen compliance to target illegal dumping and unlicensed disposal site operators.
- The Queensland Government has committed to an introduction date of 1 July 2011 for introduction of the levy. Recognising the significant information, administration and infrastructure requirements needed as a result of this commitment, communication and awareness material will be made available well in advance of the levy commencement date. Training about the legislative and operational changes will commence in early 2011.

DERM is continuing to discuss key aspects of the legislative provisions, levy design and program development with stakeholders.

The government has a vision for a low-waste Queensland that looks for ways to avoid waste generation in the first place, and sees the wastes that cannot be avoided as a resource rather than a problem. In doing so Queensland can seize the economic, environmental and job opportunities arising from better waste and resource management. The strategy will drive a decade of significant improvement in waste and resource management in Queensland and move us towards achieving this vision.

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## 1.0 Background

On 5 June 2010 the Queensland Government released the draft Waste Strategy: Waste Avoidance and Recycling 2010-2020 (the draft strategy) for public consultation. The consultation period ran for 10 weeks, and was extended twice due to significant stakeholder and community interest in this issue. The consultation period ended on 16 August 2010.

The Department of Environment and Resource Management (DERM) received 96 written submissions on the draft waste strategy during the consultation period. Submissions were received from six broad sectors: private individuals (8 submissions), community and environment groups (13 submissions), local governments (21 submissions), Queensland government agencies (3 submissions), the waste and resource recovery sector (26 submissions) and general business and industry (25 submissions). The make-up of submitters is represented in Figure 1.

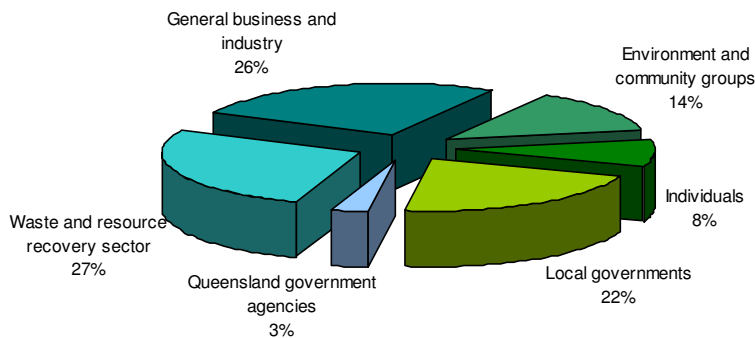


Figure 1 – Breakdown of submitters by sector

During the consultation period, DERM organised or attended a number of stakeholder consultation briefings in south-east and regional Queensland. These briefings reached more than:

- 110 waste and resource recovery sector representatives
- 80 general business and industry representatives
- 60 local government representatives
- 20 environment and community group representatives.

Throughout the consultation process DERM has continued to hold discussions with key stakeholders about legislative provisions, levy design and program development. To help facilitate discussions, a Stakeholder Advisory Committee, chaired by the Minister for Climate Change and Sustainability, has been established. This Committee first met on 28 July 2010 and has been asked to provide advice about the reform process.

The Stakeholder Advisory Committee consists of representatives from key stakeholder sectors, including local government, waste management and recycling, construction, general business, community, environment and development. Three technical working groups have also been formed to provide advice about specific aspects relating to legislative reform, program development and levy design.

DERM will continue to hold discussions as the legislation and programs are finalised and implemented.

## 2.0 Introduction

This consultation report provides a summary of the submissions received during the consultation period as well as comments made during the targeted stakeholder forums. Issues raised through the consultation process have been summarised under five broad topics:

- strategy concepts, goals and targets
- distribution of levy funds
- programs
- legislative issues
- levy administration and implementation.

DERM's response to the issues raised in the consultation is given under each of the broad topics above. Feedback from consultation was used to inform the final waste strategy and will be considered in developing and implementing the legislative framework, programs and levy system.

## 3.0 Strategy concepts, goals and targets

### 3.1 General comments on the draft strategy

Submissions indicate that all sectors support the strategy including its vision, aims and concepts, the waste hierarchy and principles, and the need for industry development particularly in regional areas. Support for a partnership approach to waste management was also a key theme within all sectors.

Product stewardship arrangements were strongly supported by environment and community groups, individuals, the waste and resource recovery sector, and local governments. Some of these stakeholders also expressed support for a cradle-to-grave and life-cycle analysis approach to waste management.

The Sunshine Coast Environment Council (SCEC) and the Sunshine Coast Regional Council said that an independent state government body should manage the waste strategy and the proposed levy.

Burdekin Shire Council emphasised the need for greater consistency between the state and national waste strategies.

### 3.2 Proposed goals and targets

There was strong support across all sectors for the draft strategy's goals and support for setting waste reduction targets. While recognising that reduction targets are important, some local government submissions also said that waste avoidance needed to be promoted as a priority.

The Sustainable Futures submission stated that all 2020 targets were well below world's best practice and the Queensland Youth Environment Council (QYEC) expressed a desire that the government strive for 80-90 per cent resource efficiency.

All sectors took the view that targets would be significantly more difficult to achieve in regional areas.

With regard to the targets for reducing municipal solid waste (MSW), the waste and resource recovery industry, business and industry and some community groups were very concerned that the target would be unachievable without a levy on MSW, including self-haul waste.

Local governments were also concerned about their responsibility for achieving the MSW targets. Some local governments, as well as Sinclair Knight Merz (SKM) and JG Services (JGS), thought that the 2014 targets were too ambitious. Cairns Regional Council, however, noted that it was well on its way to achieving the MSW targets.

Local governments pointed out that the only opportunity to increase household recycling would be through organic waste diversion (which many said is costly to implement) and reducing the recyclable component disposed of in the general waste stream from household bins.

Master Builders supported the construction and demolition waste (C&D) targets noting that some individual operators were already achieving the 2020 targets. Townsville City Council suggested increasing the target for diversion of regulated waste. Scenic Rim Regional Council did not support the landfill emissions reduction targets.

The Queensland Conservation Council (QCC) submission supports a goal of zero waste with interim targets similar to those set in New South Wales whilst Burdekin Shire Council suggested removing the creation of green jobs as a goal and improving consistency with the national waste strategy goals.

### 3.3 Baseline data

All sectors expressed little confidence in the baseline data used to calculate the targets. Local governments and Environment Institute of Australia and New Zealand (EIANZ) suggested that a comprehensive accounting system for waste generation, disposal, recycling and resource recovery needed to be established involving a number of stakeholders prior to setting targets. The Waste Management Association of Australia (WMAA) and the Local Government Association of Queensland (LGAQ) recommended mandatory reporting for private landfill operators to get a better picture of waste generation.



### **3.4 Reduction target for illegal dumping and littering**

SKM supported a target for illegal dumping and litter reduction. Some local governments took the view that it would be pointless to set targets for which baseline data was not available while others suggested that these targets could be based on a litter/illegal dumping survey. The Central Queensland Local Government Association (CQLGA) suggested that setting differential regional targets for illegal dumping and littering would be more appropriate.

### **3.5 Landfill diversion target**

Whale Bins and several regional councils suggested having a target for reducing waste to landfill to encourage waste-to-energy initiatives, whilst other local governments and community organisations did not consider this necessary.

Some local governments, as well as SKM, and some individuals, voiced their support for a landfill diversion target for green waste.

### **3.6 Regional targets**

Some regional councils and the Queensland Murray-Darling Committee suggested establishing different targets for regional and rural areas based on their potential for resource recovery and recycling.

### **3.7 Other targets**

There was also some support for targets for:

- consumer choice behaviour
- maximum resource efficiency
- sector-specific targets such as public place recycling
- a recycled content target for government procurement, including infrastructure programs
- diversion of biodegradable waste from landfill
- reducing landfill gas by 50 per cent
- waste reduction through less resource-intensive manufacturing processes.

### **3.8 Mandatory targets**

There was some support from the waste and resource recovery industry, business and industry and some community groups for mandatory targets. However, some local governments particularly in rural areas opposed mandatory targets because there is currently not as much opportunity for recycling and resource recovery in rural areas compared with urban areas.

LGAQ does not support mandating the targets as proposed in the draft strategy. There was support from the waste and resource recovery sector and some councils for targets to be adjustable over time. Sunshine Coast Regional Council suggested that targets could be included in Environmentally Relevant Activity licences or adopted as law in each local government area to allow some flexibility in the targets and create a level playing field to improve certainty for investment.

### **3.9 Measuring targets**

Stakeholders across all sectors questioned how targets would be measured. Whitsunday Regional Council recommended that waste should be measured in overall tonnes, as opposed to tonnes per person, if population growth is to be de-coupled from waste growth. Transpacific thought that DERM should provide annual reports on progress towards achieving targets.

### 3.10 Link between goals and targets and actions

Across all sectors there was a call for a stronger link between the strategy targets and goals and the strategy programs. Transpacific suggested listing the programs under specific targets.

#### **Response**

*The government recognises the need for enhanced data collection and reporting to assess the achievement of the strategy's targets and to set future targets. Accordingly, a major focus of the strategy is to improve data collection that supports more specific targets for each waste stream. The final strategy provides more information about the link between the strategy's goals and targets and the programs. As the data upon which the targets are based is incomplete, targets will not be mandated at this stage.*

## **4.0 Distribution of levy funds**

### **4.1 Business sector themes**

The Chamber of Commerce and Industry Queensland (CCIQ) strongly objected to levy revenue being directed to general environmental projects and said that all levy money should be used to support businesses in reducing waste and recovering resources through improved recycling services. Timber Queensland also supported the allocation of all levy money to waste management rather than consolidated revenue.

The Ai Group queried the rationale behind the levy allocation and highlighted industry's concern that the proposed Waste Avoidance and Resource Efficiency (WARE) funding would be inadequate to deliver meaningful initiatives.

The Australian Food and Grocery Council welcomed the WARE fund and highlighted design-for-environment and improved data collection and reporting as actions likely to produce tangible results.

### **4.2 Waste and resource recovery sector themes**

The waste and resource recovery sector consistently opposed funding that gives a competitive advantage to local government over the private sector. Several submissions also stated that infrastructure funding should not discriminate between public and private sectors.

Transpacific Cleanaway and the Australian Council of Recyclers (ACOR) opposed allocating levy money to non-waste initiatives. Transpacific Cleanaway also opposed any funding for local government in the absence of a levy on MSW, and JJ Richards noted that local government was the recipient of much of the levy money and queried whether expenditure of such funds would be tied to pre-determined purposes. The Waste Contractors and Recyclers Association Queensland (WCRAQ) could not endorse the Sustainable Future Fund until more details are known.

Accountability was a strong theme amongst the waste and resource recovery sector. WCRAQ took the view that targets should be clearly linked to programs, and that there should be an accountable body if targets are not achieved. ACOR recommended that funding should be limited to a percentage of project costs, and should only go to companies with a sound business model and track record of environmental stewardship. Several submissions called for waste industry input into how the WARE fund operates.

### **4.3 Local government themes**

Local government consistently advocated allocating most or all levy funding to waste minimisation and resource recovery initiatives (a view also supported by EIANZ and ACOR). Burdekin Shire Council stated that funds should not be used to cover DERM's administrative costs. Several local governments suggested that funding in the first five years or so should be devoted solely to waste, with other environmental initiatives able to be considered for funding after this time.

Local Authority Waste Management Advisory Committee (LAWMAC) said funds should be restricted to levy zone councils while the Council of Mayors (SEQ) requested that funds collected in south-east Queensland be spent in that area. Some local governments sought assurance that good performers or early adopters would still be eligible for further funding.

Local governments wished to be involved in regional coordination and funding decisions through an advisory committee or regional body. The need for multi-year funding of infrastructure initiatives was also raised.

#### 4.4 Community and environment groups and private individuals themes

Submissions generally supported waste minimisation programs. EIANZ supported allocating all funding to waste minimisation, but opposed funding that gives local government competitive advantage over the resource recovery industry. Terrain Natural Resource Management supported the buy-back of cassowary habitat.

##### **Response**

*The levy funds will be directed to waste reduction, resource recovery and recycling measures as a priority. The levy money will be allocated in the first four years from 2011-12 as follows:*

- *\$159 million Waste Avoidance and Resource Efficiency Fund for targeted programs to help business and industry reduce the amount of waste they generate, and to encourage industry investment in recycling technologies, particularly in regional areas*
- *\$120 million Sustainable Futures Fund for councils to spend on environmental projects, focussing on better waste management facilities and practices. In an Australian 'first', a dedicated fund will be provided for councils to undertake priority initiatives that may not otherwise be achieved given competing pressures for local government expenditure*
- *Any surplus funds will be dedicated to environmental initiatives, including acquiring national parks.*

*The levy funds are intended to foster waste management and resource recovery improvements across Queensland. This is why it is intended that funds also be used to help improve practice in the non-levy zone.*

## 5.0 Programs

### 5.1 Business sector themes

A key theme running through industry association submissions was the need to expand recycling infrastructure, including in regional areas. This issue was highlighted by Housing Industries Australia (HIA) and Urban Development Institute Australia (UDIA) in relation to C&D waste.

Timber Queensland highlighted the need for a range of recovery solutions including renewable energy options for low value timber waste.

The Ai Group and CCIQ reinforced the need for support to businesses to minimise their waste. Introducing a waste audit program for businesses was supported by the Scenic Rim Regional Council and by 60 per cent of businesses surveyed by CCIQ. The Rubbish Removers supported grants to small business to install resource recovery and recycling infrastructure.

Submissions also emphasised the need for comprehensive educational programs to help business reduce waste, in particular small business and the construction sector.

Industry associations also stressed the importance of rewards and recognition for businesses demonstrating best practice and innovation in waste minimisation.

Business submissions wanted funding allocated to projects that are cost-effective as well as environmentally beneficial.

### 5.2 Waste and resource recovery sector themes

Waste industry submissions placed a high priority on changes to planning and approval processes to encourage industry investment in infrastructure.

Allocating resources to improve government enforcement and compliance against unlawful operators was viewed as crucial, particularly as implementing the levy would exacerbate commercial disadvantages for lawful operators.

The Australian Landfill Owners Association (ALOA) was concerned that funding landfill infrastructure would penalise operators who have already invested in best-practice equipment (a concern shared by some local governments). However, WCRAQ supported funding environmental harm mitigation works for local government landfills, such as capping and installing landfill gas systems.

ACOR viewed product stewardship schemes, together with optimal materials diversion from disposal, as the top two priorities of a sustainable materials management strategy. They also supported regional infrastructure development and programs supporting smaller businesses.

### 5.3 Local government themes

Many local governments (as well as ACOR) supported the proposed program areas in the draft strategy. CQLGA, for example, supported most of the program areas, and expressed willingness, as a proactive leader in regional waste management, to contribute to state-wide projects. Some submissions said that further consultation with local government was needed to identify more cost-effective programs, or that programs should be more clearly linked to strategy goals and targets.

Many submissions commented on proposed local government program areas. In particular, they stressed the importance of recognising and financially supporting local government waste management plans, including regional and decentralised approaches. Comments on other proposed local government program areas centred on issues such as equity for regional areas, local government consultation and regional coordination.

Action on litter and illegal dumping, education, and waste avoidance were important themes for local government.

The Council of Mayors (SEQ) stated that funds set aside for local government infrastructure and administrative systems are insufficient. Townsville City Council suggested levy funding be used to equalise transport costs for recyclables across the state, rather than penalise early adopters by funding infrastructure.

Scenic Rim Regional Council advocated mandating the inclusion of waste avoidance and recycling in local government planning schemes and community plans.

## 5.4 Community and environment group and private individuals themes

Submissions from this sector strongly supported product stewardship. EIANZ advocated design for environment, such as developing biodegradable and recyclable products, and assessing product durability.

Submissions from EIANZ and the Queensland Murray-Darling Committee highlighted the importance of programs to support local infrastructure and market development and regional capacity-building.

Submissions from this sector also emphasised the advantages of education, community engagement and participation in recycling and waste minimisation, such as heavily packaged goods. Stronger action on litter was another common theme.

Submissions from private individuals favoured changing consumer behaviour, as well as government acting to ban release of helium balloons or all balloons. One submission supported a fee on plastic bags.

## 5.5 Particular programs

There was cross-sector support for some of the proposed programs and initiatives, principally:

- **Government waste reduction** was viewed as important in terms of showing leadership and sustainable procurement.
- **Enhancing recycling programs** (for example, by reducing contamination of recycling streams, and removing unrecyclable waxed cartons from the recycling stream) were seen as important. Existing recycling programs such as public place recycling were supported.
- **Infrastructure development** was recognised as important by all sectors. Industry submissions emphasised developing regional infrastructure to provide recycling options for business. Townsville City Council recommended funding a regional or state hazardous waste facility.
- **Market development** was supported by all sectors, with the need to develop markets for recycled organics often singled out.
- **Improved use of organic wastes** was supported by Compost Queensland who advocated regulatory reform of licensing and quality standards, as well as research, education, community gardens and organics recovery for business. ACOR, EIANZ, Trust Nature FNQ and others approved of a focus on capture and conversion of green and food wastes into organic products. CQLGA supported a regional approach to trialling a third bin for household organics, while Whitsunday Regional Council pointed out the need to consider treatment route, contamination, and reprocessing options in relation to any such system.
- **Landfill gas re-use** was supported by SCEC who advocated a stronger focus on climate change, and mandated thresholds for landfill gas capture, a view supported by ACOR. WCRAQ, and some local governments, supported reducing greenhouse gas through implementing landfill gas capture.
- **Product stewardship** was supported in submissions from individuals, community and environment groups, local government and some waste and resource companies. They particularly supported the product stewardship approach to management of priority materials. QCC and CCIQ said that selection of priority materials should be based on improved understanding of material flows. Some submissions nominated priority materials; for example, safe recycling of gas bottles was a high priority for some.
- **Education** was commented on by local government and community/environment groups. They emphasised the importance of focusing educational efforts around the top or 'reduce' end of the waste hierarchy, for example to reduce consumption of heavily packaged goods. Rockhampton Regional Council noted that significant community education would be required to meet recycling targets for MSW, in the absence of a levy on this waste stream.
- **Litter and illegal dumping** was strongly supported amongst individual and community group submissions for a public reporting system for litter, and a ban on releasing lighter-than-air balloons. Local governments and EIANZ supported improved compliance on litter and some advocated stronger penalties. The Council of Mayors (SEQ) was concerned that funding would be inadequate to target illegal dumping.
- **Improved data collection and reporting** was strongly supported by all sectors.

Views on some other program areas were mixed, in particular:

- **A resource exchange register** was strongly supported by the UDIA and CQLGA (based on discussions with central Queensland businesses), but not by Scenic Rim Regional Council.
- **Container deposit schemes** were supported by QCC and some local governments, but opposed by other local governments.
- **Alternative Waste Technologies (AWT)** were commented on by several waste and recycling sector submissions who advocated adopting particular alternative waste technologies to maximise the energy potential of organic wastes and avoid the need for source separation of wastes. Townsville City Council recommended developing state-packaged AWT to provide local solutions in regional areas. Other submissions from local government and the waste and environment sectors called for a framework around AWT addressing issues such as efficiency, environmental outcomes, and commercial viability.

### **Response**

*Feedback on programs will help inform program development, along with continuing input through the Stakeholder Advisory Committee about content and governance arrangements. The final strategy includes a summary of program areas, and a detailed business plan will be released in 2011 outlining program details, including budget allocation and funding criteria for grants programs.*

*DERM recognises that successful product stewardship will play an important role in avoiding waste generation and supporting appropriate resource recovery. DERM has been, and will continue to be, actively contributing to the national waste policy. The product stewardship arrangements proposed for the new legislation reflect the current national priorities and are consistent with the national framework.*

## 6.0 Legislative issues

Issues were raised about the current and proposed legislative framework for waste management. Some councils and businesses thought that flexibility in the legislative framework was important. For example, the Sunshine Coast Regional Council suggested removing state legislation requiring weekly collection of household waste to allow for greater flexibility if organics segregation was implemented.

The waste and resource recovery sector and some local governments supported investigating current legislative impediments to waste avoidance and resource recovery, including reviewing policies and standards that may inhibit the use of recycled-content goods as a way to improve the legislative framework.

Mackay Regional Council suggested including legislative provisions that empowered local governments to issue a Penalty Infringement Notice (PIN) to householders for contaminating recycling bins.

### **Response**

*The Environmental Protection (Waste Management) Regulation 2000 contains provisions allowing local governments to issue a PIN for placing inappropriate waste in the bin. The review of this regulation will be undertaken with local governments to see if further provisions are required to help meet the MSW recycling targets.*

## 6.1 Definitions

Stakeholders from the waste and resource recovery sector said that to avoid creating impediments to resource recovery there must be no ambiguity in the definitions in the legislative framework. SITA Environmental Solutions (SITA) noted that it is important that the definitions are consistent with waste codes used in other states, and some business and industry stakeholders requested terminology and definitions to be consistent with other jurisdictions. Ergon Energy requested clarification on what wastes constitute lower and higher hazard wastes.

## 6.2 Beneficial use approvals

Some local governments and some waste and resource recovery sector stakeholders asked for clarification about how beneficial use approvals would function under the new waste management framework. Coal combustion products (fly ash and furnace bottom ash) are a regulated waste and are currently re-used under two Beneficial Use Approvals, which expire in 2013 and 2014. The Ash Development Association of Australia would like to have some long-term legal certainty for generators, processors and users of this waste.

## 6.3 Planning

The waste and resource recovery sector and local governments noted that there was a need to streamline the planning approval process for waste disposal, recycling and recovery infrastructure. WMAA noted that there needed to be a link between development approvals and the proposed strategic waste management plans. The waste and resource recovery industry were concerned that the present system gave local governments a competitive advantage as they acted both as waste facility operators and development approvers. Some stakeholders from the waste and resource recovery sector suggested removing sections 369, 369A, 369B and 369C of *The Environmental Protection Act 1994*. Boral Waste Solutions (Boral) supported declaring waste management services (public or private) as an essential service and not subject to normal planning frameworks.

Scenic Rim Regional Council suggested that the new legislation require local governments to include waste avoidance and recycling in the community plans that they are required to create under the *Local Government Act 2009*.



## 6.4 Licensing

Compost Queensland noted that there was a need to streamline licence conditions for organics recycling operations.

Western Downs Regional Council suggested improving the consistency of the licensing system.

In order to enhance accountability and transparency, WCRAQ recommended implementing a mandatory licensing system for all operators engaged in waste management, recycling and resource recovery that was accessible to the public and that records the operator's actual operating address, disposal locations it uses and licences it currently holds to operate.

SCEC supported mandatory landfill licence requirements for gas capture and flaring for facilities over a certain landfill capacity threshold.

## 6.5 Landfill disposal bans

ACOR and Ipswich City Council supported the use of landfill bans under the new legislative framework.

### **Response**

*DERM will lead and facilitate discussion between the waste and resource recovery sector, local governments and other government departments to resolve planning issues, improve the current licensing system and establish a clear set of definitions. The new legislation will contain provision to phase in disposal bans for priority products and materials.*

*Lower and higher-hazard regulated waste classifications will be established in regulation. Some regulated wastes may be pre-classified into a lower or higher classification while others will require testing for total contaminants and leachability before the classification for disposal and levy application is determined. For example, regulated wastes such as treated clinical waste may be pre-classified as lower hazard while loose asbestos may be pre-classified as higher hazard.*

## 7.0 The levy

There was strong support from the waste and resource recovery sector, community groups and some business and industry groups and individuals for introducing a waste disposal levy. For example, Timber Queensland said the levy would be an effective way to improve recycling of wood waste.

Bundaberg Regional Council also recognised the need to implement a levy to make waste disposal costs in Queensland more comparable to the other states and noted their commitment to working with the state government to implement an effective system.

## 7.1 Application of the levy

### 7.1.1 Exemption of municipal solid waste and self-haul

The waste and resource recovery sector, business and industry, and community groups and some individuals were highly critical of excluding MSW and self-haul from the levy and thus argued the following:

- there will be reduced funds for strategy programs
- the exemption creates greater operational problems for collecting the levy
- it would encourage C&D waste contractors to disguise waste as domestic self-haul
- very small operators who do not fall within the licensing system could take waste to the tip acting as local residents
- mixing MSW and commercial waste streams would make compliance difficult
- it would be impossible to achieve the strategy's targets for MSW
- there would be little incentive to invest in household organics collection and processing and there would be no driver to increase diversion of organics from MSW which is needed to stimulate the recycling industry
- the majority of other states have a levy on MSW
- it goes against the government's user-pays philosophy
- the levy should be applied equally across all sectors
- it would drive the skip bin industry out of business
- it would be inappropriate that local government benefits from levy revenue when MSW is exempt
- interstate MSW will be transported to Queensland to avoid other states' waste disposal levies.

Local governments supported the exemption of MSW. The majority supported an exemption of the levy on self-haul because illegal dumping may increase if self-haul is included. Some local governments have also requested that the following be included in the MSW exemption:

- waste from mechanical street sweeping and surface cleansing activities
- debris, litter, contaminants, sediments and detritus removed from 'stormwater quality intervention devices'
- sediment from maintaining 'engineered drainage systems, including creeks and waterways'
- C&D waste from community infrastructure
- residuals from material recovery facilities
- material that has a beneficial re-use on site, such as treated acid sulfate soil
- fire ant material
- liquid wastes from coal seam methane projects.

### **Response**

*The main reason for excluding domestic kerbside-collected waste from the levy is that, under current local government charging systems, households have no capacity to reduce their liability under the levy as they pay a flat rate on their rates.*

*The proposed definition of MSW included domestic kerbside-collected and self-haul waste, and waste generated as a result of local government municipal services, such as park maintenance, gardens, street bins, and sewage and water treatment plant residues. Waste resulting from street-sweeping operations is also currently included as MSW. Waste generated from the commercial or administration activities of local governments is not included as MSW.*

*Disposal of fire-ant material is a proposed exemption as it has specific disposal requirements and cannot be used for another purpose.*

*DERM recognises the issues raised by the waste and recycling sector and by general business about the potential impact on the skip bin sector and possible sorting opportunities by excluding domestic self-haul waste from the levy. At the time of publication of this report, the issue was still under discussion.*

*A Regulatory Assessment Statement (RAS) and a cost-benefit analysis discussing the application of the levy and the proposed exclusion of MSW from the levy have been prepared.*

### **7.1.2 Residual waste from recycling**

The waste and resource recovery sector has suggested having a lower waste disposal levy or no levy for the un-recycled contaminated component of recycling material streams.

For example, several metal recyclers have requested that shredder floc (residues from the car recycling process) be excluded from the levy as this would reduce the range at which it is economical to pick up scrap metal, possibly resulting in the illegal shipment of scrap metal overseas for processing under lower environmental standards. Transpacific Cleanaway also pointed out that a levy on residual waste may provide a disincentive to 'mine' old C&D landfills. Chip Tyre has also requested that residual waste from tyre recycling operations be exempt.

Some local governments have also requested that residuals from material recycling facilities sourced from MSW be exempt from the levy.

JJ Richards noted that exempting residuals from the levy has the potential to create more 'loopholes' and compliance issues.

### **Response**

*Under the model consulted on residual waste from a material recovery facility (MRF) would be considered to be commercial and industrial waste and a levy of \$35 per tonne would apply.*

*At the time of publication of this report, the issue of MRF residuals was still under discussion with the resource recovery sector.*

### 7.1.3 Exemption of solid residuals from liquid waste

Local governments and business and industry have requested clarification on applying the levy to solid waste coming from water treatment plants and biosolids from sewage treatment plants.

#### **Response**

*The proposed definition of MSW includes solid waste from local government water and sewage treatment plants.*

### 7.1.4 Contaminated and acid sulfate soil and dredge spoil

The Australian Contaminated Land Consultants Association of Queensland and some local governments are concerned that a levy on contaminated and acid sulfate soil will result in delays and reductions in remediating contaminated land, and disposal of contaminated material to unlicensed sites. There was a suggestion from local governments that treated acid sulfate soil be exempt from the levy as it is used as cover material.

The Australian Ports Association request further clarification on applying the levy to dredge spoil and suggested having a differential levy for contaminated and acid sulfate soil depending on the level of contaminants.

Environmental Earth Sciences supported a differential levy on contaminated soil to encourage proper treatment and disposal.

#### **Response**

*A levy of \$35 will apply to landfill disposal of acid sulfate soil, uncontaminated dredge spoil and contaminated soil for which a disposal permit has been granted under the Environmental Protection Act 1994.*

*The levy does not apply to soils that are suitable for use as cover material. A percentage of clean fill and treated acid sulfate soil is likely to be exempt from the levy for each site to be used for daily, intermediate and final cover purposes if the material is suitable for this purpose. Current contaminated land remediation and disposal processes will remain in place.*

*If dredge spoil, other than that generated in accordance with maritime safety requirements (such as ensuring the shipping channel is maintained), is disposed of to a disposal site, the levy of \$35 per tonne will apply.*

### 7.1.5 Asbestos

Several stakeholders have requested that asbestos be exempt from the levy and sought clarification on applying the levy to mixed loads containing asbestos.

#### **Response**

*An exemption for appropriately managed asbestos material is currently proposed. If a levy were applied it has the potential to discourage correct handling, which could lead to an increase in illegal dumping or inappropriate disposal decisions. The Queensland Government does not want to divert asbestos from landfill, as there is no other management option. It is felt that applying the levy to appropriately managed asbestos may have a perverse outcome of encouraging illegal dumping or other inappropriate management instead of managing the material safely.*

*The exemption only applies to asbestos that has been appropriately managed. If loose asbestos is contained in a load, the higher-hazard regulated waste levy of \$150 per tonne will apply. This will discourage attempts to avoid paying the levy by claiming the asbestos exemption.*

### 7.1.6 Quarantine waste

SITA requested clarification on how quarantine waste will be classified.

#### **Response**

*Quarantine waste is regulated under federal quarantine laws. Disposal of quarantine waste may only be accepted by waste disposal sites licensed to accept such a waste. It is proposed that a levy at the rate of \$35 will apply to disposal.*

### 7.1.7 Farm waste

LGAQ and other local governments recommended that farm waste be exempt from the levy to avoid on-site dumping.

#### **Response**

*In determining the levy exemptions, farm waste has not been included at this stage. However, if applying the levy on a particular waste stream is likely to lead to a poorer environmental outcome, there is potential to grant an exemption. In this case, if a levy applying to farm waste is likely to see a return to on-site disposal, an exemption could apply.*

### 7.1.8 Exemption of waste from not-for-profit organisations

Some councils and charity organisations have raised the issue that an unintended side-effect of a waste levy could be increased illegal dumping at charity shops. The National Association of Charitable Recycling Organisations strongly supported a levy exemption for waste that has been received by charities as donations. Mackay Regional Council noted that most local governments have gate fee exemptions and issue certificates for charities.

#### **Response**

*It is proposed that a levy exemption will be available for waste that not-for-profit organisations receive as a result of charitable donations or through undertaking a community service. Criteria and conditions around the exemption are likely to be regulated. The exemption would not apply to the waste generated as a result of the organisation's own administration.*

### 7.1.9 Printing wastes

Printing companies have requested that businesses that have achieved Sustainable Green Print accreditation be exempt from the proposed waste levy as they continue to reduce waste directed to landfill.

#### **Response**

*It is not proposed at this stage that these businesses be exempt from the levy. However, there may be other incentives through program delivery and priority product actions that could be provided to encourage continued accreditation and for other businesses to reduce their waste to landfill.*

## 7.2 Levy amount

There was overall recognition of the difficulty of setting a levy rate for Queensland and that the proposed levy was reasonable. EIANZ suggested the levy amount be based on the risk of the waste type or the amount of processing required. Burdekin Shire Council questioned how the proposed levy amount reflected the actual cost of disposal throughout the state.

ALOA supported a levy that didn't differentiate by waste type. ACOR supported a higher levy for hazardous waste, but recognised that the system should be as simple as possible. Mackay Regional Council was concerned that a differential levy may provide incentive for hazardous waste to be diluted with other waste streams to avoid paying the higher levy. Sustainable Futures noted that the levy should send a stronger price signal and suggested increasing the levy over time. Transpacific was concerned that the levy was not consistent with other states. Timber Queensland thought the proposed levy rates were reasonable in comparison to other state levies, but was concerned about any classification of treated timber waste as lower-hazard regulated waste.

### **Response**

*In order to reduce the complexity for landfill operators of collecting and administering the levy, a \$35/tonne waste levy will apply to all general waste streams aside from those excluded and exempted from the levy. A rate of \$50/tonne will apply to lower hazard regulated waste and a \$150/tonne will apply to higher hazard regulated waste. The levy amounts will increase by the Consumer Price Index each year.*

## 7.3 Levy zone

There was concern among local government and business and industry that applying the levy in some regional areas could encourage illegal dumping and affect the viability of businesses as there is currently limited opportunity for recycling and resource recovery. The following issues were raised by various stakeholders:

- the levy should be initially introduced only into south-east Queensland
- a \$20/tonne levy should apply in rural areas with a \$40 per tonne for south-east Queensland
- the levy should not apply to landfills servicing populations under 500 people and landfills that are more than 50 km from the nearest population centre
- the levy should apply to Balonne, Paroo, Murweh and the Maranoa Regional Shires
- state-wide application of the levy should be considered
- the 50 km inclusion zone should be expanded to 200 km
- the levy should be introduced to the south east corner of Queensland initially
- a four- to five-year moratorium on introducing the waste levy west of the Great Dividing Range
- a reduced levy rate for regional and remote shires in North Queensland.

### **Response**

*The levy zone comprises 34 local government areas. The levy will apply to waste that is both generated and disposed of within the levy zone. Waste generated within the levy zone and disposed of outside the levy zone will also attract the levy. This will diminish the incidents of illegal dumping.*

*The local governments in the levy zone will be given assistance prior to 1 July 2011 to help waste disposal sites within the local government area become levy-ready. Local governments within the levy zone all have a population in excess of 10,000 people.*

## 7.4 Operational issues

### 7.4.1 Timeframe for implementation of the levy

There was significant concern across local government, the waste and resource recovery sector and business and industry about the levy's introduction on 1 July 2011. The waste and recycling industry were concerned that there was insufficient recycling and resource recovery infrastructure in place for waste diversion. Transporters were specifically concerned that they would not have administrative systems ready to pass on levy costs. Local governments were concerned that there was not enough time to establish infrastructure and administration systems to collect the levy, and businesses asked for time to train staff, change systems and inform customers. Across all sectors there was concern that short time frames would result in deficiencies in the waste management framework, particularly in the legislation and regulations.

However, ALOA and QYEC supported the start date for the levy, provided legislation and regulations were in place by the end of 2010. Several other submissions stated that they would need to know what they had to do by no later than the end of March 2011 to be able to change processes and pricing structures.

#### **Response**

*The Queensland Government has committed to a start date of 1 July 2011 to introduce the levy. DERM recognises the significant administrative and infrastructure obligations placed on local governments as a result of this commitment and has attempted to make the levy collection and administration system as simple as possible. Communication and awareness material will be made available and training will commence early in 2011.*

*Some of the infrastructure required to collect the levy at local government facilities will be provided through the \$4.1M infrastructure adjustment program being rolled out in 2010–11.*

### 7.4.2 Levy collection infrastructure and administration costs

Local governments have requested funding to cover infrastructure and administration costs associated with the levy collection, including:

- data collection and reporting
- weighbridges, fences and gates, site works, road works, drainage
- baling/sorting systems for recyclables
- computer systems
- signage
- additional staff.

ALOA and some local governments did not support the levy revenue being spent to fund landfill infrastructure as this would disadvantage operators who had already upgraded their systems.

#### **Response**

*The infrastructure adjustment program will cover infrastructure necessary to collect the levy from 1 July 2011. Funding will not be available to cover infrastructure or activities that form part of Environmentally Relevant Activity licence condition for the site. New or upgraded computer systems are part of the program.*

### 7.4.3 Levy remittance and GST

Townsville City Council suggested that the levy should be remitted to DERM quarterly. Some local governments requested that DERM establish a clear reporting system that minimises the administrative burden for local governments. WCRAQ wanted clarification about whether GST would apply to the levy.

#### **Response**

*The legislation will allow for different due dates for remittance of the levy to DERM, depending on the amount of waste received at the disposal site. Remittance will be required 60 days from the end of each month. For example for the month of July payment will be required by 30 September. Information requirements and due dates will be established in regulation.*

*The levy will not be subject to GST.*

### 7.4.4 Rebates for waste segregated for recovery by landfill operators

Landfill operators have asked for a system of rebates for materials diverted for recycling or recovery upon which the levy has already been collected in order to create an incentive for landfill operators to commission separation and recycling systems.

#### **Response**

*There are no rebates provided in the current arrangements. At the time of publication of this report, the issue of incentives for greater resource recovery at landfills was still under discussion.*

### 7.4.5 Volumetric conversion for the levy

Some landfill operators and waste transporters are concerned about the conversion of the levy to volumetric rates where there is no weighbridge and would like further clarification about how this will work.

#### **Response**

*DERM is currently working with the waste sector to validate the volume to weight conversions that have been considered as part of the levy consultation process. Information from this sector suggests that the conversion factors may be too low and that some vehicle types are missing. Once finalised, the conversion units will be stated in regulation and will be used in circumstances where there is either no weighbridge or the weighbridge is inoperable.*

### 7.4.6 Levy collection by waste transporters

Waste transporters are concerned about the difficulty they will have estimating the levy when they pick up waste. Townsville City Council noted that there was little incentive for a waste generator to reduce waste as the differential would be kept by the transporter who would only be liable for the exact weight at the landfill.

#### **Response**

*The disposal site operator will be responsible for estimating the levy and remitting the amounts owing to DERM. Legislation may require the disposal site operator to broadly identify the waste disposal levy as part of the waste service provided. This will give an indication to the operator's customer that an additional charge is applied to dispose of the waste.*



#### **7.4.7 Increased cost to business and industry**

CCIQ noted that 67 per cent of its members did not support a commercial waste levy. It said the levy would increase operating costs to businesses and it would not increase recycling and resource recovery as they were already engaged in such initiatives. The HIA was also significantly concerned about increased cost for its members. Master Builders noted that many builders were already achieving high levels of recycling and resource recovery.

#### **Response**

*As part of the waste reform process, programs will be run to help business and industry to eliminate or reduce their waste and, consequently, their liability under the levy. Applying a levy on commercial and industrial waste is consistent with the waste management approach in other states.*

#### **7.4.8 Disposal technologies and the levy**

SITA has requested clarification on applying the levy to incineration, composting and autoclave facilities.

#### **Response**

*The levy does not apply to autoclave, composting or incineration facilities.*

## 7.5 Compliance

### 7.5.1 Liability for unpaid levy debts

Landfill operators have noted that they do not want to be liable for unpaid levy debts and requested clarification. Some waste transporters, however, thought that DERM should take action against landfill operators for unpaid levy debts.

#### **Response**

*The waste disposal site operator is responsible for remitting the amount of levy owing to the State, regardless of having recovered the levy from its customers. DERM will take action to recover any unpaid levy from the site operator not from the transporter/waste generator.*

*The legislation will provide opportunities for the site operator to apply for an extension of time to remit levy payments, or apply to pay by instalment. In certain circumstances, DERM may waive part or all of the levy payment. These options will be subject to transparent and rigorous criteria stated in the regulation.*

### 7.5.2 Mixed loads of commercial and domestic waste

Local governments and the waste and resource recovery industry are concerned about the practical application of the levy to mixed loads of C&I and MSW. Boral noted that landfill operators do not have capacity to confirm the source wastes or percentage of mixed loads and that enforcement provisions should be directed at transporters not landfill operators. Burdekin Shire Council noted that all waste collected by contractors on its behalf are mixed commercial and domestic loads. Mackay Regional Council is concerned that C&I and C&D operators will falsely claim a percentage of loads to be MSW to avoid the levy.

#### **Response**

*Any means of identifying individual loads of MSW and C&I or combined MSW/C&I loads needs to be transparent and clear to the site operator to reduce the risk of misclassification of the waste stream. It is likely that the regulation will clearly state a default position for distinguishing MSW from C&I for the purposes of the levy. The regulation may also allow for establishing an approved method of calculating the leviable component.*

### 7.5.3 Waste transport in/out of levy zone

Local governments and the waste and resource recovery sector have expressed concern about waste being transported from within the levy zone to areas outside to avoid the levy. There was some concern that the levy was not equal with other states and that waste could still be transported to Queensland for disposal.

Ai Group suggested implementing a system to document waste transport like the one in New South Wales.

#### **Response**

*The levy applies to waste that has been generated within the levy zone – even if it is disposed of outside the levy zone. DERM will monitor this situation to determine how much leakage there is. Those waste disposal sites outside the levy zone that are likely to be vulnerable to receiving waste from the levy zone will also be provided with infrastructure assistance.*

*Waste from outside the levy zone that is disposed of within the levy zone will also attract the levy. This includes interstate waste, as it has been generated outside the levy zone. This removes the incentive to transport waste for disposal in Queensland as the levy will apply. A buffer zone has also been identified that will be the focus of compliance.*

#### 7.5.4 Unlicensed operators

There is significant concern from the waste and resource recovery industry as well as local government about illegal operators unfairly disadvantaging legitimate operators. Stakeholders pointed out that this is an existing problem that may be exacerbated by the introduction of a levy.

##### **Response**

*Any operator that holds, or is required to hold, an approval for a disposal activity will be required to pay the levy for waste disposed of at that site. The levy must be paid by an operator fitting this requirement from 1 July 2011. Failure to remit the levy is an offence, whether or not the site holds a current approval. The offence is created from 1 July 2011, irrespective of whether the illegal disposal activity is identified on that day or after commencement. DERM is developing a compliance project that will target unlicensed operators.*

#### 7.5.5 Illegal dumping

Across all sectors there is significant concern that a levy will encourage illegal dumping. Local government is particularly concerned as it will wear the burden of cleaning up illegally dumped waste. Some councils have requested help with any increased enforcement costs and suggested a partnership approach. HIA and Master Builders emphasised that illegal dumping of non-building-related waste into skips on building sites by the general community is also a problem.

##### **Response**

*One of the priority funding areas is assistance to discourage and detect illegal dumping. Experience in other states suggests that an increase in illegal dumping is likely after the levy is introduced.*

*One program area that DERM is investigating is regional illegal dumping squads, similar to those used in NSW, to help local governments with identification, compliance and awareness-raising.*

*A public reporting system is also being introduced to encourage the public to report litter and illegal dumping actions from vehicles. DERM will also partner with organisations such as Keep Australia Beautiful and Clean Up Australia to raise community awareness of littering and illegal dumping behaviours.*

## 8.0 Stakeholder consultation forums

Date	Stakeholder
Tuesday 8 June 2010	Initial Key Stakeholder Briefing
Thursday 17 June 2010	Waste Management Association of Australia
Friday 25 June 2010	Local Authority Waste Management Advisory Committee (NQ)
Monday 28 June 2010	Industry groups (target overarching groups) , local government and DERM
Tuesday 29 June 2010	Brisbane City Council
Wednesday 30 June 2010	DERM staff
Friday 2 July 2010	Waste Management Association Australia
Friday 2 July 2010	DERM staff
Monday 5 July 2010	Mackay Regional Council
Tuesday 6 July 2010	Central Queensland Local Government Association and DERM staff
Tuesday 6 July 2010	Gold Coast City Council
Tuesday 6 July 2010	DERM staff
Tuesday 6 July 2010	Waste Management Association of Australia
Wednesday 7 July 2010	Council of Mayors South East Queensland
Wednesday 7 July 2010	DERM Land Centre staff
Wednesday 7 July 2010	Ipswich City Council
Thursday 8 July 2010	Local government and DERM
Thursday 8 July 2010	Sunshine Coast City Council
Thursday 8 July 2010	RSD Environmental
Friday 9 July 2010	Urban Development Institute of Australia
Friday 9 July 2010	Sims Group
Monday 12 July 2010	Local Government Association of Queensland
Monday 12 July 2010	DERM staff
Monday 12 July 2010	Australian Industry Group (Ai Group)
Monday 12 July 2010	Bundaberg, Fraser Coast, Gympie, South Burnett, North Burnett regional councils
Monday 12 July 2010	Chamber of Commerce and Industry Queensland
Tuesday 13 July 2010	Waste Contractors and Recyclers Association Queensland
Tuesday 13 July 2010	DERM staff
Wednesday 14 July 2010	Western Downs, South Burnett, Toowoomba councils and, Lifeline
Thursday 15 July	Master Builders Association
Thursday 15 July	DERM Land Centre staff
Thursday 15 July	DERM staff
Friday 16 July 2010	Local Government Association of Queensland
Monday 19 - Tuesday 20 July 2010	Local council members
Monday 19 - Tuesday 20 July 2010	DERM staff
Wednesday 21 July 2010	Visy; Manager and Sales Team
Friday 23 July 2010	Environmental Health Australia, South West Queensland group meeting (not primary consultation)
Wednesday 28 July 2010	Waste Reform Stakeholder Advisory Committee meeting

Date	Stakeholder
Wednesday 28 July 2010	Redland City Council
Thursday 29 July 2010	Commonwealth officers
Tuesday 3 August 2010	Veolia
Tuesday 3 August 2010	Department of Employment, Economic Development and Innovation (DEEDI) and Department of Infrastructure and Planning (DIP)
Monday 9 August 2010	Council of Mayors SEQ
Thursday 12 August 2010	SIRF Rt (Sustainability Roundtable)

## 9.0 List of written submissions

DERM received 96 written submissions during the consultation period

Local Government (21)	
Brisbane City Council – City Waste Services	Brisbane City Council – City Works
Bundaberg Regional Council	Burdekin Shire Council (BSC)
Cairns Regional Council	Central Queensland Local Government Association
Council of Mayors South East Queensland	Gold Coast City Council
Ipswich City Council Waste Services	Local Authority Waste Management Advisory Committee
Local Government Association of Queensland	Mackay Regional Council
Redland City Council	Rockhampton Regional Council
Scenic Rim Regional Council	Sunshine Coast Regional Council
Tablelands Regional Council	Toowoomba Regional Council
Townsville City Council	Western Downs Regional Council
Whitsunday Regional Council	
Queensland Government (3)	
Department of Environment and Resource Management – Wetlands Protection Policy	Department of Environment and Resource Management Central West – Environmental Services
Department of Employment, Economic Development and Innovation	
Waste and resource recovery sector (26)	
The Rubbish Removers	Bosco International Pty Ltd
LMS Generation	Compost Queensland
Waste Contractors and Recyclers Association Queensland	Green Bins
Moreton Bay Recycling	Australian Landfill Owners Association
Handybin Waste Services	Boral Waste Solutions
Sims Metal Management	Whale Bins
Beutel, Oughtred & Sons Pty Ltd	Transpacific Cleanaway
Chip Tyre Pty Ltd	Kartaway
Sustainable Organics	JJ Richards & Sons Pty Ltd
Veolia Environmental Services	SITA Environmental Solutions
Alex Fraser Group	Waste Management Association of Australia
Australian Council of Recyclers	Global NRG Ltd
Onesteel Recycling Pty Ltd	Zenergy Australia Pty Ltd

**Business and Industry (25)**

Port of Brisbane	Motor Trades Association
Urban Development Institute of Australia	Queensland Tourism Industry Council
Aurecon	J G Service Pty Ltd
Allcrobe	Australian Portable Toilet Supplies
Australian Association for Environmental Education	Chamber of Commerce and Industry Queensland
Printing Industries Association of Australia	Housing Industry Association Ltd
Master Builders	Sustainable Futures
Australian Food and Grocery Council	Ash Development Association of Australia
Timber Queensland	Ergon Energy
Cement, Concrete and Aggregates Australia	Environmental Earth Sciences
Australian Industry Group	Eclipse Resources
Sinclair Knight Merz	Australian Contaminated Land Consultants Association Queensland
Australian Agricultural Colleges Corporation	

**Environment and community groups and individuals (21)**

Mr Harry Johnson	Mr Anthony Muyt
Mr Mic Langburne	Mr Chris Manning
Ms Jenni Wyrsta	Ms Lil Williamson
Ms Angie Stringer	Mrs Nina Hardie
Queensland Murray-Darling Committee Inc.	Queensland Youth Environment Council
Queensland Conservation Council	Sunshine Coast Environment Council
Environment Institute of Australia and New Zealand	Keep Australia Beautiful
National Association of Charitable Recycling Organisations	Leukaemia Foundation
Reverse Garbage	Butt Free Australia
Tri Q	Terrain Natural Resource Management
Trust Nature Far North Queensland	