

2 April 2019

Office of Resource Recovery  
Department of Environment and Science  
Queensland Government  
wastepolicy@des.qld.gov.au

**Submission on the Draft Waste and Resource Recovery Strategy**

To whom it may concern,

This submission is made on behalf of Capricorn Conservation Council (CCC), Rockhampton, Queensland. CCC is the principal not-for-profit environmental advocacy organisation in Central Queensland.

We make our comments on the Strategy with the understanding action plans will be created to provide further detailed information at a later date. Therefore, we make these comments, based upon the information that is currently provided and look forward to the opportunity to comment further when more detailed information is made available.

We support the introduction of a Waste levy set at \$75 per tonne to begin in July 2019. While we approve the government allocating 70% of the levy funds to resource recovery, it is disappointing that this allocation includes providing funds to local government to offset the levy for households for the first three years. It is a misstep to exempt the municipal sector from the levy.

We support the Circular Economy Principles and the application of the Waste Hierarchy to underpin the strategy, and note avoidance, reuse and recycling practices should be prioritised and that landfilling or mixed waste incineration is not considered part of a circular economy.

We do not support Mixed Waste Incineration (MWI) and the promotion of polluting waste to energy technologies. All targets can be met through improved recovery and recycling services. MWI facilities add to local pollution and health problems due to emissions, are economically very expensive and are known to undermine genuine recycling services. We note that in 2017-18 Queensland produced nearly 11 million tonnes of waste, an increase of 19% in the last decade and recycled 4.9 million tonnes. That figure represents about 45% of the waste generated. We are concerned that it is only an overall estimation and does not reveal the performance of the three waste sectors regularly assessed (municipal, commercial/industrial and construction/demolition). It would have been beneficial to display the latest figures for these sectors.

According to the State Government Recycling and Waste Report (2017) the Municipal sector landfilled 1.8 mt and recovered 832,000 (30.9% recycling rate), the Commercial/Industrial sector landfilled 1.4 mt and recovered 1.3 mt (47.8% recycling rate) and the Construction/Demolition sector landfilled 2.1 mt and recovered 2.2 mt (50.8% recycling rate). These figures reveal the relatively poor performance of the municipal sector in waste reduction/recycling.

Resource recovery and local government offset levy funding should be bound to key performance outcomes that contribute to the strategic goals. Applications for funding should outline project outcomes and deliverables and be able to demonstrate these outcomes as a requirement for funding. Similarly, local government funding should be invested in identified waste reduction strategies that will truly reduce average household waste figures and make households levy-ready for the future.

How does DES plan to monitor, regulate and publicise performance outcomes for programs receiving levy funding?

The target set for household waste reduction (25% by 2050) is misleading and is inconsistent with the target for municipal waste to landfill (5%-10% by 2050). The target should be 90-95% reduction by 2050, based upon a benchmark figure of the amount of waste currently going to landfill today. Government figures indicate that to be about 1.8 mt (2016-17). Both waste and recycling targets should be set as they act to verify each other. They are also important, when figures do not correlate, to identify potential data gaps or fraud.

The household waste reduction target (stated as 10% by 2025) to achieve a municipal waste disposal target of 45%, is wrong. According to government figures, the actual recycling rate for household waste is just over 30% (not 45% as the strategy infers). That would mean setting a 25% waste reduction target by 2025 for household waste. Better services combined with pricing reduction options to households to reduce waste could remove most of the waste that should not be there and achieve the 2025 target.

Thank you for your consideration of our submission.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely



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**Capricorn Conservation Council**