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Draft Waste Strategy
Department of Environment and Heritage Protection
GPO Box 2454
Brisbane QLD 4001

To whom it may concern,

ACOR submission on the Draft Queensland Waste Avoidance and Resource Productivity Strategy

The Australian Council of Recycling (ACOR) welcomes the opportunity to comment on the *Draft Queensland Waste Avoidance and Resource Productivity Strategy (2014-2024)*.

1.0 MORE AMBITIOUS STRATEGY TARGETS

More ambitious recovery targets should be adopted given Queensland has one of the highest rates of waste generation and waste disposal of to landfill per capita¹ among other states. In addition, the overall resource recovery rate in Queensland fell 7%² compared between the financial years 2010- 11 and 2012- 13. It is imperative that the Government needs to adopt a more aggressive approach in avoiding waste generation and increasing reuse, recycle and recovery. ACOR suggests that the recovery targets should be further increased to meet the national average recovery rates by 2024.

¹ Sourced from the Australian Bureau of Statistics (ABS)— *Year Book Australia 2012* (<http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/1301.0~2012~Main%20Features~Waste%20management~277>)

² Sourced from the Queensland Department of Environment and Heritage Protection- *State of Waste and Recycling in Queensland 2013* (<https://www.ehp.qld.gov.au/waste/pdf/state-of-waste-recycling-report2013.pdf>)

2.0 CRACKDOWN ON ILLEGAL DUMPING AND ROGUE OPERATORS

Illegal dumping and stockpiling, especially tyres and e- waste are problematic in Queensland. While the draft waste strategy acknowledges the importance of reducing litter and illegal dumping, there are no concrete actions/ measures on how the goals will be achieved. ACOR received several reports regarding excessive and long term stockpiling in several areas across Queensland. As illegal dumping and stockpiling result in significant State revenue loss and irreversible environmental and social impacts, it is necessary for the Government to increase effort in combating these illegal activities.

3.0 LANDFILL BANS

ACOR strongly supports landfill bans to resource industry profitability and national market integrity following the removal of the Queensland levy and the increases in the NSW levy. Landfill bans not only improve environmental and social values but also avoid economically valuable materials disposed of to landfill in the absence of a landfill levy. ACOR suggests that all recyclable materials should be eventually prohibited to disposal of to landfill. To start with, problem wastes such as hazardous waste, liquid waste, used oil and used whole tyres should be banned. In addition, all wastes should be subjected to resource recovery processes prior to being able to be disposed of to landfill. Additional statewide landfill bans should be placed on the following materials:

- Aggregated cardboard and paper
- Aggregated glass packaging
- Aggregated metals
- Aggregated PET or HDPE plastic packaging
- Computer monitors & televisions
- Computer monitors & televisions
- Florescent lighting (SEQ region only)
- Lead acid batteries
- Medical waste
- Other electrical or electronic equipment
- PP or LDPE plastic packaging
- PVC or PS plastic packaging
- Vegetative matter collected by local councils
- Vehicles
- Whitegoods
- Whole earth mover tyres

4.0 GOVERNMENT PROCUREMENT OF RECYCLE CONTENT

To optimise the economic benefits from reuse, recovery and recycling, ACOR supports the inclusion of recycled- content products and procurement. However, we believe that recycled-content should be included and specified in the Government's procurement policies.

5.0 INDUSTRIAL ECOLOGY

ACOR strongly supports the inclusion of industrial ecology in the draft strategy as national and international evidence is conclusive in relation to its effectiveness in cost recovery.

6.0 FINANCIAL MECHANISM FOR THE WASTE STRATEGY

By far the greatest shortcoming of the Draft Strategy is the absence of any financial resources or funding mechanism to achieve the very modest targets or to fund implementation plans. Other than a landfill levy, a co-regulatory model could be adopted with waste generators and new entity established to disburse funds. Otherwise funding from consolidated revenue will be required. If adequate resources are not identified then the strategy has no chance of success.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Grant Musgrove', written in a cursive style.

Grant Musgrove

Chief Executive Officer