



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

21 March 2019

Submission on the Draft Waste and Resource Recovery Strategy

Dear Sir/Madam

Thank you for the opportunity to comment on the *Draft Waste and Resource Recovery Strategy*. Boomerang Alliance and our 47 member groups support the intent of the strategy and its focus on eliminating wastes, significantly increasing reuse and recycling and basing the strategy on Circular economy principles.

However, as a high-level document it contains little detail on how the strategy goals will practically be achieved. The action plans that will sit under this strategy will need to explain what the government intends to do. These action plans must be able to demonstrate that the Principles of the Circular Economy will be put into practice and goals and targets set will be achieved.

Background







Since 2015 Queensland has made great progress on waste and litter reductions. This was necessary as the State had one of the highest waste rates and lowest recycling rates in Australia. Queensland was also one of the most littered States in the Commonwealth. QLD also lacked a Waste levy to put a price on waste and encourage resource recovery.


In 2018 the State Government introduced a ban on lightweight plastic bags (July) and a Container Refund Scheme (November). Both of these measures have already had a significant impact on waste and recycling rates. According to the National Retailers Association lightweight plastic bag use has reduced by

80%, whilst the container refund scheme collected over 250 million containers in its first 4 months of operation.

We note that a measure of Queensland's progress in addressing plastic waste and litter through these measures was the fact that addressing plastic pollution in this way was not a party political issue. Both measures enjoyed the full support of the LNP Opposition and indeed, the legislation that introduced both measures was passed unanimously in the Parliament.

At the 2017 Queensland election all parties confirmed support for both a plastic bag ban and container refund scheme. There was also support from other political parties for continued policy action on other single use plastics. This was expressed through support for the Queensland Plastic Pollution Reduction Strategy. We encourage continued progress on this strategy.

QUEENSLAND ELECTION Which political parties are acting to reduce single-use plastic?					
	ALP	LNP	ONP	Greens	KAP
Supported plastic bag ban & Container Refund Scheme legislation	 Introduced legislation Sept 2017	 Supported legislation	 Supported legislation	 Supported legislation	 Supported legislation
Support action in next term of Parliament to reduce other disposable plastic waste and litter	 Confirmed Plastic Pollution Reduction Plan policy	 No announced policy, but confirmed support for waste reductions & a Plastic Pollution Reduction Plan	 No policy announcements	 Support Plastic Pollution Reduction Plan, waste levy & bans on non-biodegradable takeaway items	 No policy announcements


● = good, supported policy
● = positive support but lacking policy
? = no known policy response

Waste Strategy

The State Government has now announced the introduction of a waste levy set at \$75 per tonne for waste going to landfill. The levy will start in July 2019. Accompanying this levy will be Waste Management and Resource Recovery Strategy for Queensland. These strategic and pricing measures, applied properly, could dramatically reduce waste, and very importantly, promote resource recovery. As a result, these could make Queensland a less wasteful and less-littered State.

This strategy is based upon Circular Economy Principles, that is the cradle-to-cradle concept, where products are made with as little virgin resources and as much recycled content and, after their use are discarded in way that they can be reused or recycled back into their original materials or uses.

Under a Circular Economy model, mixed waste going to landfill, or incineration is regarded as a failure of the system and we note that the strategy draws that conclusion.

Our Specific Responses to Issues Raised

The document is high-level and strategic and includes little information to make comment on. We understand a series of action plans will be developed to provide that detail later this year. We therefore make these comments, based upon the information that is 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. This amount has been set to promote better waste and recycling practices in QLD and to make it uneconomic for cross-border waste transportation. We believe that this levy rate should be reviewed every 5 years, and increased, if goals are not being achieved.

We support the Circular Economy Principles and the application of the Waste Hierarchy to underpin the strategy and note that according to the strategy documents that mixed waste incineration is not considered part of a circular economy.

We welcome that the Government is allocating 70% of the levy funds to resource recovery. However, it is disappointing that this allocation includes providing significant funds to local government to offset the levy for households for the first 3 years. In our view, it was a mistake to exempt the municipal sector from the levy on introduction.

With significant funding being provided for resource recovery and to local government (to offset the levy) we stress that any funds provided for resource recovery and waste reductions should be tied to key performance outcomes that contribute to the strategy goals. Applications for funding should outline

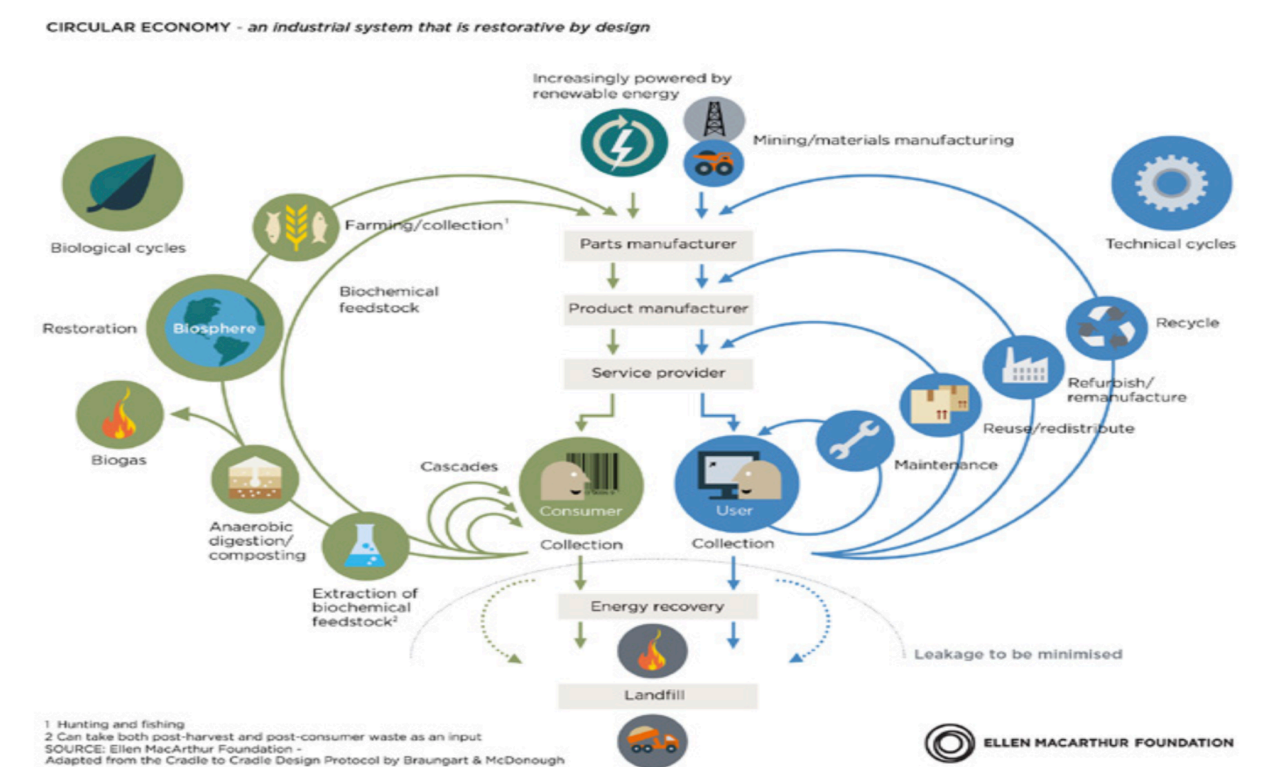
project outcomes and deliverables and be able to demonstrate these outcomes, as a requirement for funding.

Similarly, local government funding, should be also be invested in identified waste reduction strategies that will actually reduce average household waste figures and to making households levy-ready for the future.

How will DES monitor, regulate and publicise performance outcomes for programs receiving levy funding?

The much publicised promotion of Waste to Energy, particularly mixed waste incineration, ignores the fact that the introduction of these technologies is unnecessary to achieving waste reduction targets. All targets can be met through improved recovery and recycling services. Mixed waste incineration facilities represent a local pollution and health problem due to emissions, are very expensive and are known to undermine genuine recycling services.

We propose that the WtE policy agenda identify technologies that contribute to the Circular economy approach. Technologies and processes that do not cause harm to environment and health or undermine preferred recycling options. Technologies such as anaerobic digestion of organics meet this criteria. Mixed waste incineration should be rejected as an option in Queensland.



Of the information that is contained in the strategy document, 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 waste generated. However, that is an overall estimation and does not reveal the performance of the three waste sectors routinely assessed (municipal, commercial/industrial and construction/demolition).

It would have been useful to show latest figures on the performance of all sectors with regard to waste and recycling. According to the State Government Waste Report (2016-17) the Municipal sector landfilled 1.8 mt and recovered 832,000 (30.9% recycling rate), the C/I sector landfilled 1.4 mt and recovered 1.3 mt (47.8% recycling rate) and the C/D 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.

The target set for household waste reduction (25% by 2050) is misleading and is inconsistent with the resulting target for municipal waste going to landfill (5%-10% by 2050). The target should be 90-95% reduction by 2050, based upon a benchmark figure of amount of waste currently going to landfill today. Government figures indicate that to be 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.

We note that these targets should be seen as a minimum and we encourage the State to review them as they lack ambition, given the potential waste reduction and resource recovery opportunities now emerging. With jurisdictional investment on resource recovery, new procurement policies by government and business and increasing public concern about waste and recycling (and the demonstrated public willingness to participate in improvements), the strategic goals could be significantly ramped up.

Local Government in Queensland have a stated target of zero waste to landfill by 2028. The largest council in QLD, Brisbane, estimates that over 70% of

household wastes going to landfill are recyclables, organics and household hazardous materials. Items that could be removed from the red bin through better collection services. On top of this the introduction of a waste levy should drive behaviour change in all sectors. Current targets below.

Table 2—Amount of waste disposed of to landfill (as a percentage of total waste generated)

Stream	2025	2030	2040	2050
MSW	45%	30%	10%	5%
C&I	30%	20%	10%	5%
C&D	25%	15%	15%	15%
Overall	35%	20%	15%	10%

Table 3—Recycling rates (as a percentage of total waste generated)

Stream	2025	2030	2040	2050
MSW	50%	60%	65%	70%
C&I	55%	60%	65%	65%
C&D	75%	80%	85%	85%
Overall	60%	65%	70%	75%

Any targets set should be mandatory.

The household waste reduction target (10% by 2025) to achieve a municipal waste disposal target of 45%, is incorrect. According to government figures (*State Government Waste Report 2016-17*), 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. This is perfectly achievable.

The tables below show a 10% MSW reduction target (table 1) with an accepted 45% of waste to landfill (table 2). The inference is that 55% MSW waste goes to landfill, and with a 10% reduction, 45% would go to landfill by 2025. However, the current actual figure for MSW is just under 70% going to landfill.

Table 1—Waste reduction targets for households

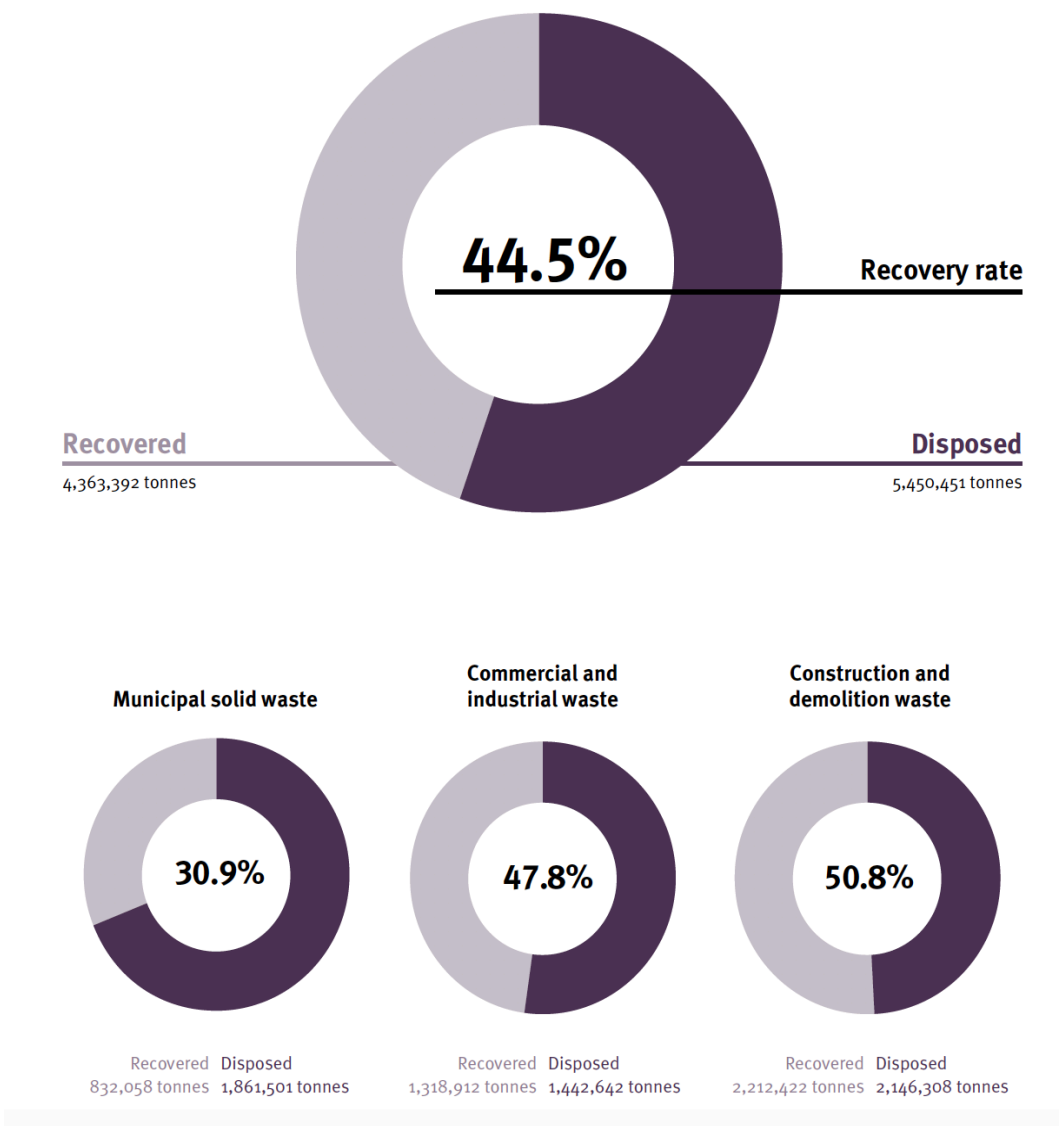
Stream	2025	2030	2040	2050
MSW	10%	15%	20%	25%

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C&D	25%	15%	15%	15%
Overall	35%	20%	15%	10%

As referenced above, this is achievable when considering that, the average Brisbane household red bin contains over 70% of materials that should not be there (recyclables, organics and hazardous materials). Better services combined with pricing reduction options to households to reduce waste, could remove most of the waste that should not be there from the red bin and easily beat the current targets.

Extract from QLD Waste Report (2016-17)



Boomerang Alliance as a member of the QLD Stakeholder Waste Taskforce is happy to continue in this role and to provide advice to the State on the development and implementation of the Waste and Resource Recovery Strategy.

Signed



Jeff Angel
Director



Toby Hutcheon
QLD Manager