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Department of Environment and Science  
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To whom it may concern

### **Submission: Draft Waste Management and Resource Recovery Strategy**

Thank you for the opportunity to comment on the draft Waste Management and Resource Recovery Strategy (the Strategy). This submission is made on behalf of the Queensland Conservation Council Inc. (QCC). QCC is the peak environment conservation organisation in Queensland, with some 50-member groups including ten regional councils, as well as thousands of supporters.

QCC welcomes the Strategy and is pleased to see strides towards a zero-waste society being initiated. In 2017-18 figures showed Queensland waste production has increased over the last decade with the 2017 State Government Recycling and Waste Report revealing room for improvement across all waste management sectors. Implementing this draft Strategy is vital for reducing waste, increasing resource recovery and achieving a near zero-waste society.

QCC supports the prioritization of avoidance, reuse and recycling practices aligned with circular economy and waste hierarchy principles. However, landfill, mixed waste incineration and polluting waste to energy technologies should not be considered as part of a circular economy. These distract from meaningful waste reduction achievements such as improvements to recovery and recycling services. Mixed waste incineration facilities pose local pollution and health risks due to emissions. They are also economically inefficient and known to undermine genuine recycling services. These risks, and any identified impacts, should be analysed for any future projects and plans. QCC recommends a reevaluation of waste-to-energy recovery as an option, with greater transparency and community consultation in regards to methods and impacts.

QCC welcomes the introduced Waste levy as a good starting point for deterring interstate waste transportation and illegal dumping as a price signal is needed to guide all Queenslanders in working to prevent waste in the first place. It is disappointing, however, to see levy funds directed to offsetting household costs for the first three years. We would like to see any levy funds provided to resource recovery projects and local governments strategies to reduce household waste and make them levy-ready.

QCC would also like to see the Department of Environment and Science's plans for ongoing monitoring, enforcement and publication of performance outcomes for any levy fund recipients. Granting of funding should be tied to performance outcomes. We look forward to seeing the Waste levy's contribution to meeting waste reduction targets and providing ongoing funds for resource recovery.

QCC fully supports the inclusion of short and long-term targets for waste reduction and increased recycling and would like to see a headline target for 2030 included. However, the targets included in the draft Strategy are misleading. The target set for household waste reduction (25% by 2050) is inconsistent with the municipal waste to landfill target (5%-10% by 2050). According to government figures, the actual recycling rate for household waste is just over 30%, not 45% as the draft Strategy suggests.

Based on current amounts of waste going to landfill and poor recycling performance across all sectors, QCC supports incrementally increasing waste reduction targets alongside complimentary recycling targets, with a waste reduction and recycling target of 90 – 95% by 2050, to reflect a pathway to a near zero waste economy. This will be achievable with the right mix of policies and price incentives, such as improving services combined with price reduction options for less household waste.

We regard the five simple actions for Queenslanders as relevant and appropriate for direct actions households can take part in. We would like to see direct engagement of communities through educational programs, promotions, and business and industry programs so that all Queenslanders assist in meeting our waste reduction and recovery goals.

With a few small adjustments and a supporting detailed sector action plans, QCC recognizes great potential for this draft Strategy to achieve a zero-waste economy in Queensland. The waste and resource management hierarchy and circular economic principles will provide a strong framework if enforced and guided appropriately.

We also encourage the Queensland Government to advocate for a consistent national approach to reduce the entry of waste into the economy. We see a future Australia with recycling conditions on all manufactured goods and packaging, proactive material recovery and collection systems and thriving secondary resource markets, with Queensland setting a leading example for others to follow.

We ask that QCC be informed of any developments and further consultation on Queensland's future waste strategy. Should you wish to discuss any aspect of this submission or contact us, please phone 07 3846 7833 or email [admin@qldconservation.org.au](mailto:admin@qldconservation.org.au).

Yours Sincerely



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