

# Investigation into the Transport of Waste into Queensland

Submission no. 0023

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Secretariat  
Queensland Waste Investigation  
*Sent via email only:* submissions@qldwasteinvestigation.com.au

Dear Secretariat

### **Submission: Investigation into the Transport of Waste into Queensland**

Thank you for the opportunity to provide a submission to the Investigation into the Transport of Waste into Queensland.

Due to limited capacity, we provide here submissions relevant to questions 1 (a) and (b) of the Terms of Reference.

Overall, we note that the recent Four Corners expose ‘Trashed’ on 24 August 2017 has provided an excellent opportunity for the Queensland Government to reflect on and investigate the areas of our waste regulation in need of significant improvements. Waste is a resource, however poorly managed waste is a burden and environmental and community hazard. Currently, as demonstrated by the Four Corners episode, the Queensland regulatory system is failing to maximise on the benefits provided through waste and good waste regulation, and inadvertently encouraging poor waste management and increasing risks to the environment and community.

#### ***Overview of regulation of waste by other jurisdictions in Australia***

State and territory level policy and regulation has the most significant influence on waste management in Australia. On our research, the implementation of a waste levy is the central factor in encouraging the movement of waste from other States into Queensland.

New South Wales, Victoria, South Australia and Western Australia have levies in place to value waste and encourage waste reduction and Tasmania has a voluntary levy in place. The Northern Territory is the only other state not to provide for some kind of levy on waste in Australia. The Australian National Waste Report 2016 provides a helpful overview of the differences in regulation of waste across jurisdictions in Australia.<sup>1</sup>

For example, in NSW the *Protection of the Environment Operations Act 1997* requires a financial contribution for each tonne of waste received at certain licensed waste facilities in NSW. The aim of the contribution is promote reuse and recycling of resources and to reduce the amount of waste

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<sup>1</sup> Blue Environment Pty Ltd (2016) *Australian National Waste Report*, Department of the Environment and Energy, Table 2, 7-8, <http://www.environment.gov.au/system/files/resources/d075c9bc-45b3-4ac0-a8f2-6494c7d1fa0d/files/national-waste-report-2016.pdf>.

being landfilled.<sup>2</sup> Further reforms in 2013 and 2014 introduced financial incentives, investment and improvements to increase effectiveness and efficiencies of recycling and enhanced enforcement powers and penalties.

This is reported as a functioning regulatory framework for the management of waste in NSW that has reaped numerous benefits for the state.<sup>3</sup> The high standard of regulation in NSW and other states has also, however, meant that operators are taking advantage of the poor management and lack of value on waste disposal in Queensland due to the economic imperative to dispose of waste cheaply.

### ***Impacts of poor Queensland regulation and regulation of waste in other jurisdictions***

Queensland is both falling behind and suffering on multiple levels due to the poor regulation of waste in this state.

In 2011 the Queensland Government, led by then Premier Anna Bligh, implemented a waste levy in an attempt to reduce the state's significant waste. It was reported at this time that per capita, Queensland is the largest generator of waste in Australia, producing enough to fill Suncorp Stadium 16 times every year, while also having the second worst recycling rate in Australia.<sup>4</sup> At this time it was reportedly cheaper for Victorian waste producers to dispose of their waste in Queensland than in their own state.<sup>5</sup> This is likely to be the case one again since this levy was repealed by the state government led by then Premier Campbell Newman in 2012.

### ***Benefits of a waste levy***

There is significant research in Australia on the benefits of placing a levy on waste disposal,<sup>6</sup> including:

- (a) increasing propensity for recycling;
- (b) improved resource recovery and reuse and waste avoidance;
- (c) reduced requirements for landfill space;
- (d) increased employment opportunities; and
- (e) increased control of waste disposal.

A study in NSW of the impacts of the waste levy on the construction and industrial industries found a significant improvement in waste resource separation and recycling by the industry to provide cost savings for their clients and increase their competitiveness.<sup>7</sup>

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<sup>2</sup> EPA NSW (2017) *Waste Regulation: Waste Levy*, <http://www.epa.nsw.gov.au/wasteregulation/waste-levy.htm>.

<sup>3</sup> EPA NSW (2017) *Waste Regulation: Waste Levy*, <http://www.epa.nsw.gov.au/wasteregulation/waste-levy.htm>.

<sup>4</sup> ABC News (2011) *New Queensland waste levy*, RN Breakfast, October 2011, <http://www.abc.net.au/radionational/programs/breakfast/new-queensland-waste-levy/3590104>.

<sup>5</sup> Business News Australia (2011) *Don't waste landfill levy*, April 11, <https://www.businessnewsaus.com.au/articles/don-t-waste-landfill-levy.html>.

<sup>6</sup> Mike Ritchie & Associates Pty Ltd trading as MRA Consulting Group (2015) *Tasmania Waste Levy Benefit Study: A submission to Southern Waste Strategy Authority*,

<http://epa.tas.gov.au/documents/tasmanian%20waste%20levy%20benefit%20study.pdf>; Schollum, Paul (2010) *Evaluation of the social optimum for the Landfill Levy in WA*, CEED Project, University of Western Australia, [http://www.wasteauthority.wa.gov.au/media/files/documents/Social\\_Optimum\\_for\\_Landfill\\_Levy\\_in\\_WA.pdf](http://www.wasteauthority.wa.gov.au/media/files/documents/Social_Optimum_for_Landfill_Levy_in_WA.pdf); EPA NSW (2017) *Waste Regulation: Waste Levy*, <http://www.epa.nsw.gov.au/wasteregulation/waste-levy.htm>.

<sup>7</sup> Centre for International Economics Canberra and Sydney (2011) *Impact of the waste levy on commercial and industrial recycling*, NSW Office of Environment and Heritage, <http://www.epa.nsw.gov.au/resources/wasteregulation/CIE-waste-levy-comm-recycling.pdf>.

***Queensland must implement a waste levy as the simplest mechanism to prevent movement of waste into Queensland from other jurisdictions***

The findings of the Four Corners expose demonstrate the obvious truth; operators are economically driven and will take advantage of opportunities to avoid costs. The simplest and most effective regulatory reform needed to improve the management and reduction of waste in Queensland clearly appears to be the imposition of a waste levy, to at least bring this state up to the standards of other jurisdictions and to remove the incentive to transport waste into our state.

Please do not hesitate to contact us if you have any questions or would like to discuss this matter further.

Yours faithfully  
Environmental Defenders Office (Qld) Inc

**Revel Pointon**  
*Solicitor*  
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