



CHAMBER OF COMMERCE AND INDUSTRY QUEENSLAND SUBMISSION

Draft Waste Management and Resource Recovery Strategy

Department of Environment and Science

▾ Office of Resource Recovery

April 2019

Introduction

1. The Chamber of Commerce and Industry Queensland (CCIQ) welcomes the opportunity to provide comment to the *Draft Waste Management and Resource Recovery Strategy* (referred to as the Draft Strategy).
2. CCIQ is Queensland's peak industry representative organisation for small and medium-sized businesses. The Chamber represents over 448,000 Queensland businesses on local, state, and federal issues that matter to them with its guiding focus to develop and advocate policies that are in the best interests of Queensland businesses, the Queensland economy, and the Queensland community.
3. CCIQ is a member of the *Recycling and Waste Management Stakeholder Advisory Group* and has been working closely with the Department of Environment to minimize the impact on levy-exposed industries and small businesses.
4. The following submission puts forward a Queensland small business perspective with respect to the contents of the Draft Strategy. CCIQ views the Draft Strategy through the lens of mitigating the impact that the *Waste Reduction and Recycling (Waste Levy) and Other Legislation Amendment Bill 2018* will have on business.
5. CCIQ opposes the Waste Levy and has done so from the outset. Accordingly, the comments and recommendations made herein are aimed at mitigating the effect that the Waste Levy will have on business and should in no way be seen as an endorsement of the Waste Levy and any other additional costs to business associated therewith.

Vision and Timing of the Draft Strategy

6. The Draft Strategy's vision of "avoid, reuse and recycle", is the strategy on which businesses will rely to reduce waste and thus mitigate the impact that the Waste Levy will have on business. Effectively, it is a 'waste levy ready' strategy.
7. With the date for the Waste Levy to commence on 1 July 2019, a transitional period between implementation of the strategy and commencement of the Waste Levy would have ensured that households and businesses are not as hard hit by the levy as what they're going to be when the Waste Levy commences.

8. CCIQ therefore takes issue with the timing of the Draft Strategy as it should have been implemented a considerable time before the Waste Levy implementation date to allow businesses a few months leading up to the implementation of the levy.
9. The Draft Strategy needs to identify the quickest ways to help business transition to a lower waste footprint. While the strategy may have long term goals, businesses need to be able to take action now and so the strategy needs a stronger sense of urgency. There needs to be a short term or interim plan that eventually brings Queensland to the long-term goal.

Support and Opportunities for Business

10. The Waste Levy may present opportunities for certain industries that could thrive under a waste strategy but there will be other industries that won't fair as well.
11. While the Draft Strategy indicates a focus on the expansion and evolution of the state's waste management and resource recovery industry, all industries will be affected by the waste levy. Industry support will therefore be crucial to ensure the survival of businesses who will be heavily impacted by the Waste Levy and to not act as a barrier for new businesses trying to enter the market.
12. The reality is that there will be businesses who will not be able to turn the waste strategy's vision into opportunities and will be focused solely on mitigating the impacts of the Waste Levy. These businesses will need to turn to programs such as ecoBiz that provide businesses with actions on how to minimize their waste.
13. Continued support by government for programs such as ecoBiz and collaboration with industry bodies needs to be a priority in the waste strategy.
14. CCIQ wishes to see a greater focus on the different opportunities for business – particularly on the concept of upcycling.
15. Upcycling is the creation or modification of a product from used materials, components and products which is of equal or higher quality or value than the compositional elements. It results in increased product longevity which enables a reduction in the use of raw materials by increasing the lifetime of used materials.
16. Upcycling can result in the introduction of:
 - 16.1 new markets for new businesses;
 - 16.2 new markets for existing businesses; and

- 16.3 increased profits for existing businesses remaining in the same market.
17. There is, however, a knowledge gap concerning ways of achieving the full potential of upcycling and government needs to support further research on this.
18. Another opportunity that a waste strategy presents is support for participation in a circular economy. This is a proven area of minimizing waste and making the most of resources and is a welcomed strategic priority in the Draft Strategy.
19. In having the priority of transitioning to a circular economy, the barriers to a circular economy need to be addressed. These barriers include:
- 19.1 regulations. Sometimes laws and regulations unintentionally force wasteful behaviour. For example, the expiration date on labels may not account for differences in how food is stored or creates the impression that food is no longer edible when it may still be safe to eat but just doesn't meet the manufacturers quality standards; and
- 19.2 cultural barriers such as the lack of consumer interest. Having a lifestyle conducive to waste reduction often doesn't comply with modern society's idea of convenience. It can require a lot of effort and planning to try and function waste free and many consumers are unwilling to make this adjustment. To remain competitive, businesses are forced to offer products that meet customer expectation – this includes convenience. Businesses will only be able to re-package and adjust when the need to do so is driven by customer demand.
20. With barriers, there are also enablers for circular economies such as certain 'environments' that make a circular economy much more practical – such as industrial parks and ports.
21. Government support of these enablers is just as critical as the plan to remove the barriers and a more detailed strategy to this effect should be given.

Review of the Draft Strategy

22. There needs to be stringent review cycles to measure how effective the strategy is. The targets that have been set are in five-year increments until 2050 but there should be a higher frequency of review.

23. Furthermore, the measurement should not only be through the target figures (as identified in the Draft Strategy) but a broader impact assessment on industries needs to be done.
24. By doing impact assessments on each industry, more detailed actions and strategies can be devised that address the unique challenges and opportunities in each industry.
25. An example of this is the Queensland Climate Adaptation Strategy's climate change Sector Adaptation Plans which are industry driven plans around their resilience to a changing climate. Waste reduction sector adaptation plans will be able identify different actions and different targets with different timelines.

General Comments

26. CCIQ would like to see the Draft Strategy contain more granular actions targeted at the different waste streams but keeping in mind that it is difficult to implement a strategy applicable to all industries. While waste streams from households will be easily identified and thus easier to reduce, the same cannot be said for industry.
27. There also needs to be a data collection plan to determine the root cause analysis of waste in the state. We may know how much waste goes to landfill and how much is recycled but there needs to be further analysis of the waste streams to determine how best to reduce waste.

Further enquiries

28. If you wish to discuss any of the contents contained herein in further detail, please contact Olivia Van der Wagen, Policy Advisor, at ovanderwagen@cciq.com.au.