



## QMDC comments on the Draft Queensland Waste Avoidance and Resource Productivity Strategy (2014 - 2024)

30 May 2014

### Submission to:

Draft Waste Strategy  
Department of Environment and Heritage Protection  
GPO Box 2454  
Brisbane Q 4001  
[waste.paper@ehp.qld.gov.au](mailto:waste.paper@ehp.qld.gov.au)

### Submitting organisation:

Chief Executive Officer  
Queensland Murray-Darling Committee Inc.  
PO Box 6243  
Toowoomba QLD 4350  
Phone: 07 4637 6276  
Fax: 07 4632 8062  
[geoffp@qmdc.org.au](mailto:geoffp@qmdc.org.au)

These comments are presented by the Chief Executive Officer, Geoff Penton, on behalf of the Queensland Murray-Darling Committee Inc. (QMDC). QMDC is a regional natural resource management (NRM) group that supports communities in the Queensland Murray-Darling Basin (QMDB) to sustainably manage their natural resources.

### 1.0 General comments

QMDC supports the need to review the ever growing waste generated across the state. The acknowledgement of the key challenges for regional Queensland to address ‘waste’ is welcoming and that the increasing transient work force associated with the resource sector is an additional factor in the overall waste generating space of rural and regional parts of the state.

QMDC initiated a new mechanism to look at and collectively address waste across our catchments with the formation of the Regional Waste Committee, comprising six regional councils of:

- Toowoomba Regional Council
- Western Downs Regional Council
- Maranoa Regional Council
- Balonne Shire Council
- Goondiwindi Regional Council
- Southern Downs Regional Council

This Committee shares a collective desire to address waste issues as a region is already working with the Department of Environment and Heritage on a key road side litter project across all six council regions.

QMDC urges the State Government to work with this Committee to overcome restraints like transport costs to achieve regional recycling and resource recovery.

A mature look at the resource sector and its inevitable impact of the regions waste including the ongoing costs and benefits is welcomed.

Waste is a society driven issue and one that needs to be looked at collaboratively, working across silos will not advance the goals of avoiding or reducing net waste. QMDC strongly believes regional NRM organisations should play a role in addressing 'waste' across the catchment regions of the state and that we remain a key stakeholder in future plans and programmes.

## 2.0 Specific comments

### 2.1 Targets for reducing waste generation and improving recycling

QMDC asserts that both the Waste Strategy and Queensland's contaminated land policy and legislative framework need to be strengthened to reflect the need to primarily avoid impact caused by waste generation and the disposal of hazardous contaminants. Currently they are mostly focussed on a mitigation or minimisation objective.

QMDC recommends that a Zero Waste target should be the primary goal of the Waste Strategy. This will require the adoption of a process, and way of thinking that significantly changes the government's approach to resources and production. A Zero Waste target is not only about recycling and diverting materials from landfills, but it is also about restructuring production and distribution systems to prevent waste from being produced in the first instance.

QMDC believes a Zero Waste target will ensure that resources already in existence are used to their maximum potential, avoiding the exploitation of untapped resources, while also providing economic and environmental efficiencies throughout the chain of production.

QMDC realises that implementing and achieving a Zero Waste target requires a profound behavioural shift within government and the community. In spite of the challenges, Brisbane City Council has adopted a Zero Waste Strategy, like many other cities, towns and regions nationally and internationally. The current 'disposable' mindset and dominant consumerism culture will need to commit to waste minimisation, beneficial reuse, and resource recovery. Without these changes, a large portion of the state's wealth will continue to be spent on addressing escalating waste management issues.

The Global Recycling Council has identified the following barriers to Zero Waste:

1. Government subsidies favour wasting and extraction;
2. The true costs of wasting are hidden, borne by the public and not factored into today's prices;
3. Producers ignore responsibility for their products and packaging;
4. Environmental and social costs of current system are not effectively addressed;
5. Inertia of existing viewpoints and practices;
6. Perception that land and natural resources are unlimited;
7. Perception that technology will solve all problems; and

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8. Perception that small individual efforts will have minimal impact on solving the overall problem.

<http://www.crra.com/grc/articles/zwc.html#4>

In the QMDB, it is obvious the resources industry, in particular need to design and operate 'cleaner'. Waste generation, such as brine cannot be avoided, but it is not being recovered as a resource for reuse or recycling. Rather than the region's reliance on landfill progressively lessening, it is increasing and a 'sustainable' region is not possible with this increase in landfilling.

## 2.2 Priority wastes and areas for action.

Tyres, agricultural plastics, vehicle batteries, used drilling fluid, brine and organic waste are priority wastes in this region.

The Waste Strategy should identify key actions for the management of food waste. It has been estimated that food waste makes up between 30 and 50 percent of all household generated waste.

For every kilogram of food waste that is not sent to landfill, a kilogram and-a-half of greenhouse gases is prevented from being emitted from a landfill. The technology exists to process waste to eliminate its greenhouse footprint and convert it into value-add composts and biofuels.

The Waste Strategy must enable the food industry to access that technology through a range of actions, for example, tax incentives to improve waste management, and stringent regulation in order to create a disincentive for food wastage.

Professor Michael D'Occhio highlighted in a presentation that food loss and wastage in Australia alone is worth \$5 billion per year.

Foodbank Queensland estimates that as much as 20% of all food produced is unsaleable for a variety of reasons, for example, products may be incorrectly labelled, have faulty packaging, be part of a trial run or are not produced to exact specifications. Since 1995, Foodbank Queensland has distributed more than 16 million kilograms of food.

<http://www.foodbank.com.au>

QMDC submits that these issues should be addressed by the food industry. Additionally the industry must adopt a zero waste strategy rather than a low waste one or if there is a waste there are mechanisms available to promote, for example, the recycling of nutrients.

Julian Cribb states in *The Coming Famine: The global food crisis and what we can do to avoid it* (CSIRO Publishing, Australia, 2010) that "the immense global waste of food is but a fraction of an even more colossal squandering of nutrients..."(p.71). Cribb likens nutrient wastage to haemorrhaging, with nutrients bleeding from every link in the food chain - from the farm in soil, water and wind; from food perishing in transit or storage; from processing and cooking; and from waste disposal.

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Cribb notes that worldwide, scientists estimate, humanity is releasing “9 million tonnes more phosphorous into the Earth’s biosphere than would occur naturally” and at that scale the global phosphorous cycle will be seriously disturbed (p.74).

Canadian physicist, Patrick Dery, applied Hubbert’s “peak oil” theorem to rock phosphate leading to the claim that the world had passed peak phosphate in 1989 (Déry, P. & Anderson, B. (2007) *Peak phosphorus*. Energy Bulletin. [energybulletin.net/node/33164](http://energybulletin.net/node/33164)).

Cribb points out the frightening scenario this paints is although there are energy substitutes for oil and gas when supplies run low or become too expensive, “there are no substitutes for phosphorous” (p.77).

QMDC argues that the time frames of the market and key proponents of the market system (like the fertilizer industry) are typically short term, dealing with 5-10 year horizons at the most, rather than 50-100 year time frames that are required.

Cordell, Drangert and White in *The Story of Phosphorus: Global food security and food for thought*, [Global Environmental Change Journal](http://www.gloenvcha.org/publications/2009/01/10.1016/j.gloenvcha.2008.10.009), (2009),doi:10.1016/j.gloenvcha.2008.10.009 state that a “balanced diet results in depletion of around 22.5kg/yr of phosphate rock per person based on current practice. This is 50 times greater than the 1.2 g/person recommended daily intake of elemental P”.

Clearly the current system of mining and processing phosphate rock, international transport and storage, fertilizer application, harvesting, food processing, retailing, storage and final consumption is inefficient.

Cribb (pp78-79) suggests solving the nutrient crisis requires Australia to commit to a plan for nutrient conservation and recycling involving the following measures:

- preventing or reducing all forms of erosion
- recycling nutrients within the farming system on a substantial scale
- eliminating fertiliser subsidies, which promote wasteful use
- introduce incentives to conserve nutrients
- fund research on ways to conserve, recycle and reuse nutrients all along the food chain
- implement plans to compost all organic urban waste and put it back into the food cycle
- develop improved technologies to harvest nutrients from waste streams
- harvest urban sewage sludge and transform it into fertiliser
- replace water-based toilets with composting designs

The Waste Strategy should inform planning legislation and policy (e.g. Regional Planning Interests Act, the proposed Sustainable Planning (Infrastructure Charges) Act), in order to:

- define “no go” zones where land contamination is not acceptable;
- provide clear and predetermined standard environmental waste management practices and Zero Waste targets; and
- provide more efficient administrative processes so that a proposal for development if its waste management practices do not live within a Zero waste target it is not allowed to proceed.

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Management action targets should focus on motivating changes in land use and industry production practices, by protecting and conserving regional and catchment environmental values and, as appropriate, undertake activities to arrest degradation and rehabilitate degraded areas. Landfilling waste should be seen as a last resort while regions transition to a Zero Waste position. The Waste Strategy needs to provide robust incentives to encourage commercial and industrial businesses and companies not to generate excessive waste in first place e.g. the construction industry or builders to be rewarded by supplying a site and using just the right amount of materials for the development/construction and not over order as is current common practice just in case there is a need for more material or they got the material calculations wrong.

Regional NRM Plans, and associated technical reports, regional profiles or overviews can provide important data on resource condition and trend analysis. These Plans therefore offer the Waste Strategy a better understanding on the waste reduction and recycling investment activities and action plans needed for the long term health and sustainability of a region's natural assets and its communities.

A more strategic and environmentally responsive Waste Strategy relies on the purpose of the action plans incorporating NRM principles and key NRM actions. Addressing waste management in terms of improving or maintaining resource condition and meeting aspirational targets for Queensland's regional assets will improve the capacity of regional communities to achieve waste management aspirations encapsulated in the NRM Plans. This level of responsiveness is clearly needed to enable the alignment of state and regional planning processes.

Setting Zero Waste threshold limits for activities impacting on natural assets (water (surface and groundwater); vegetation and biodiversity; land and soils; air ) will help government and industry to identify whether a new development or existing industries or businesses can operate without generating or disposing of levels of general and hazardous waste that will cause unacceptable impacts on those assets.

### **3.0 Recommendations**

**That the State Government:**

- 3.1 Adopt a statewide Zero Waste Policy.**
- 3.2 Fully evaluate materials discarded at regional scales and design waste out of the system by holding producers responsible for their impact.**
- 3.3 Require product designers and marketers to implement Zero waste as a critical design criterion.**
- 3.4 Establish environmentally preferable purchasing guidelines to reduce resource use, and greenhouse gas emissions.**
- 3.5 Work with the Regional Waste Committee to overcome transport costs restraints.**

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- 3.6** Involve stakeholders (residential, industrial, business) actively in the development of regional Zero Waste Plans, including extensive education, outreach and input on the Plans' proposed policies and programs.
  - 3.7** Establish Zero Waste goals from 2014 and a target year to achieve Zero Waste.
  - 3.8** Prioritise policies, incentives and programs to eliminate waste and reduce the toxicity of discarded materials.
  - 3.9** Identify current waste elimination, reuse, recycling, nutrient recovery and composting policies and programs from a menu of best Zero Waste practices around the world.
  - 3.10** Work with local government and businesses to build useful alliances and share successes.
  - 3.11** Support community actions to encourage businesses to change their policies and practices to move towards Zero waste.
  - 3.12** Require commercial businesses and industries to adopt Zero waste goals, to develop Zero Waste plans, to adhere to Zero Waste principles, to meet waste diversion targets, and to source separate designated materials that can be reused, recycled or composted.
  - 3.13** Support existing and new reuse, recycling and composting businesses and non-profit organisations and help them to expand.
  - 3.14** Develop locally and regionally owned and independent infrastructure.
  - 3.15** Develop regional resource recovery parks to provide locations for expansion of reuse, recycling and composting businesses.
  - 3.16** Fund community Zero waste initiatives with fees levied on the transport, transfer and disposal of wastes and leveraging the investments of the private sector.