Waste—Everyone's responsibility

Draft Waste Avoidance and Resource Productivity Strategy

We welcome your feedback on this draft strategy. Please return your feedback by Friday 30 May 2014 to waste.paper@ehp.qld.gov.au or to:

Draft waste strategy Department of Environment and Heritage Protection GPO Box 2454 Brisbane Q 4001

The form below is provided to assist with the provision of comments. Submissions can be made in any format.

All submissions will be published on the department's website. Please advise of any commercial in confidence issues at the time of submission.

Your details:

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For individuals - state of residence: N/A

For others - company name: Environment Institute of Australia and New Zealand (EIANZ)

Sector (select one):

Business and industry

Feedback on Draft Waste Avoidance and Resource Productivity Strategy for Queensland (2014–2024)

Questions for Section 2

2.1 Does the vision express where we want to be?

Yes, the vision that Queensland will become a national leader in avoiding unnecessary consumption and waste generation, adopting innovative resource recovery approaches, and managing all products and materials as valuable and finite resources is a commendable vision.

2.2 Are these the right targets/measures for the strategy?

It would be helpful to define what comprises municipal solid waste (domestic). Does this primarily include household waste, or also wastes from other municipal sources? If the latter, what else contributes to the category of municipal solid waste? Although opportunities and priorities for addressing household waste is discussed in Section 3, no targets have been identified for these wastes in Section 2. Is this because household waste is considered to be well managed? How will reduction behaviour in householders be implemented if there is no target for it? We are concerned that if there are no targets, potential campaigns will be difficult to initiate and success difficult to measure (e.g., for green and food waste recycling campaign).

Questions for Section 3

3.1 Are there key opportunities that have not been highlighted yet?

There is no mention of monetary incentive/disincentive mechanisms as a potential tool. For example, many jurisdictions in North America and Europe apply a small deposit levy (e.g., a few cents per item) when purchasing items that come in cans or bottles, which is then returned when the can or bottle is returned. EIANZ would be interested to know if this type of mechanism was considered and if so, what pros and cons were identified.

3.2 Have the highest priority problem wastes for Queensland been identified?

For the most part, yes, it would appear that the highest priority problem wastes for Queensland have generally been identified. However, regarding "hard to handle waste such as mattresses", we recommend that the list of examples should be expanded (for example items such as furniture). Otherwise mattresses may be the only waste considered here, which may result in a take back scheme that involves a deposit/return fee being the only viable mechanism. This would shed a different light on principle 2: Sharing responsibility for avoiding unnecessary consumption and improving resource management, which holds that those who generate waste should share responsibility for its management.

Questions for Section 4

4.1 Have the correct priority areas for each objective been identified?

Yes, it would appear that the correct priority areas have been identified for each objective.

4.2 Are there additional tools that can be employed to effectively minimise waste and maximise resource productivity?

In our view, this all depends on the quality of the action plans, which are not contained in the strategy. Business and government entities should develop waste avoidance and reduction action plans that align with the objectives and work towards the targets.

Without some sort of waste deposit/return levy – where will the funds come from for campaigns, innovation, waste data system etc.?

Questions for Section 5

5.1 What are the needs for data collection and reporting?

Considerable cost and effort can be expended to collect data. As an organization that represents environmental professionals, we are of the opinion that data should not be collected for data's sake. Rather, data should be collected to answer questions that are currently going unanswered, and to measure the effectiveness and successes (or failures) of the strategy over the next 20 years. Therefore, the requirements for data collection should be tied to the targets by waste stream and measure over the life of the program. A regional aspect to data collection would seem relevant, given the differences in types and volumes of wastes between the more urbanized south east of the state, and the rural regions.

Other comments

Overall, EIANZ is encouraged by the level of collaboration that was involved in preparing this Strategy document. We are also encouraged by the recommendation that sectors/organizations will need to report publicly on the progress of their action plans under the strategy.

Feedback on the Draft Review Report (Appendix 4)

A draft review report on the current strategy - Queensland's Waste Avoidance and Resource Efficiency Strategy 2010-2020 - is at Appendix 4. These findings have informed development of the new draft strategy. In commenting on the draft strategy you may also wish to comment on the draft review report.

Comments

Regarding Appendix 4 – Draft Review Report on Current Strategy we are of the opinion that the new strategy could have gone further in presenting information on waste avoidance.

About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ) is the leading professional body in Australia and New Zealand for environmental practitioners, and promotes independent and interdisciplinary discourse on environmental issues. On all issues and all projects the Institute advocates good practice environmental management delivered by competent and ethical environmental practitioners.