



Committee Secretary
Health and Environment Committee
Parliament House
George Street
Brisbane 4000

Email: HEC@parliament.qld.gov.au

14 March 2023

Dear Committee

Re: Waste Reduction and Recycling and Other Legislation Amendment Bill 2023

Thank you for the opportunity to provide feedback on the *Waste Reduction and Recycling and Other Legislation Amendment Bill 2023*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,000 members from over 500 entities nationwide, we represent the breadth and depth of the sector, within business organisations, the three (3) tiers of government, universities, and NGOs.

Our members are involved in the full range of important waste management and resource recovery activities within the Queensland economy, including the responsible management of residual materials, which is an important and essential role in an effective best practice waste management and resource recovery system.

At a high level WMRR is very pleased to see ongoing attention and reform being given by government to our essential sector, given that Queensland continues to have one of the lower recovery rates in Australia, requiring an additional two (2) million tonnes of infrastructure capacity and investment to be delivered over the next seven (7) years in order to achieve its 2030 targets of 80% resource recovery.

WMRR supports amendments in the Bill to align and strengthen the elimination in Queensland of single-use-plastics, however WMRR would caution states continuing to create bespoke bans for their own specific jurisdictions making it challenging for consumers and national retailers to respond to individual jurisdictional requirements, any future considerations should be aligned nationally.

Whilst the majority of WMRR's comments can be found at Annexure A, WMRR is compelled to address the comments in the Explanatory Notes that there has been consultation on a number of the aspects of the Bill. Regrettably WMRR must refute this statement, particularly in relation to the provisions that relate to clean earth. The reality is that since 2020, and the implementation of the waste levy, WMRR has been at pains to have the Department of Environment and Science, work collaboratively with industry (operators and local government) to address the numerous concerns held about clean earth management in Queensland, including classification and levy liability. To date these issues,

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remain largely unresolved, and industry was completely unaware of the proposals contained in this Bill until its tabling which is greatly disappointing for all those impacted.

The use of clean earth is an accepted and important practice in the management of best practice landfills for operational purposes such as daily cover and building infrastructure on site as required as sites change. WMRR supports that there should not be an automatic exemption, however with only three (3) months until this revocation is enacted, Queensland remains without a clear process for obtaining approvals for such operational uses, nor a clear understanding of how these changes may in fact affect existing license approvals and conditions. The absence of such clarity can have real commercial impacts on both landfills and their customers.

The waste and resource recovery sector recognises and supports the need for Australia to transition rapidly towards a circular economy, that is an economy that designs out waste and pollution and is genuinely resourceful taking active steps to mitigate carbon and its impacts. At this time, WMRR would submit that the WARR sector, arguably does the heavy lifting when it comes to creating a circular economy within Australia, given how integral we are to the recycling and recirculating of materials within the productive economy, and we do however support government at every opportunity promoting circularity. However, WMRR would point out that a circular economy does not begin with waste, in fact its goal is to keep *material* at its highest and best value for as long as possible and design out waste. Hence in WMRR's view circular economy legislation should not be within the *Waste Reduction and Recycling Act (WRR Act) 2011*, rather a circular economy requires enabling policy and legislation that does not require something to be managed by waste. The role of the WRR Act and subordinate legislation should be limited to managing waste only.

Thank you for taking the time to review and consider WMRR's submission, please do not hesitate to contact the undersigned to discuss further.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan', written over a light blue circular graphic element.

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

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Annexure A

Submission:

Section	WMRR Comment
Clause 9 Insertion of new s8AA Meaning of <i>waste</i>	In theory WMRR supports the concept of material remaining a resource and not becoming a waste, where it is appropriate to do so. However there is a lack of clarity as to how this section would work in practice nor has there been consultation as to how such a proposal will operate, particularly in relation to the <i>end of waste</i> framework that is already cumbersome and currently being reviewed by government.
Insertion of new s9A Meaning of <i>circular economy principle</i> and <i>circular economy</i>	As mentioned above the WARR industry supports and practices circular economy, however it is a system that must operate across the entire supply chain and not simply within the waste system, as such this is not the correct location for this meaning.
Clause 11	Queensland does not appear to have clarity on what is circular economy, can this please be articulated?
Clause 12	It is important if the five (5) year review is accepted that Local Government's also have their review period altered to align, that is five (5) years.
Clean Earth deletion	Please see the body of the letter and the concerns raised.