



Ms. Patricia O'Callaghan
Director General
Department of the Environment, Tourism Science and Innovation
GPO Box 2454, Brisbane QLD 4001
Lodged via email: OCE.policy@des.qld.gov.au.

26 June 2025

Dear Ms O'Callaghan

Re: Draft new Queensland Waste Strategy 2025–2030 – Less Landfill, More Recycling

Thank you for the opportunity to provide feedback on the draft new *Queensland Waste Strategy 2025–2030 – Less Landfill, More Recycling* (“Draft Strategy”) and for hosting an online workshop for our Queensland branch on 10 June 2025. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia’s \$21 billion waste and resource recovery (WARR) industry. With more than 2,300 members from nearly 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. Our members are involved in the breadth and depth of WARR, engaging in activities fundamental to the success of the Australian economy including infrastructure investment, collections, remanufacturing of valuable products from resource recovered materials, energy recovery, community engagement and education, and responsible management of residual waste.

The WARR sector is significant and essential to both the Queensland and national economies, currently employing more than 11,800 people in Queensland and contributing \$1.5 billion to the state economy, creating local green jobs, generating investment, and mitigating carbon. In Queensland, WMRR represents over 380 individual members from than 50 entities from across the value chain. According to the most recent data available, Queensland in 2022/23 generated almost 10 million tonnes of waste in 2023/ 24, with 4.2 million tonnes still being sent to landfill, which means that a further two (2) million tonnes needs to be diverted from landfill and resource recovered over the next five (5) years to meet the 80% resource recovery target by 2030. This will require significant investment and regulatory certainty in order for this to occur. Whilst this is a challenge, it is also a great opportunity for Queensland to create local jobs, mitigate carbon and create a significant remanufacturing industry in Queensland to complement its existing resource industry.

In September 2024 WMRR wrote to Queensland’s government leaders with industry’s [Election Priorities](#) highlighting the need for the state to recognise the essential role our industry plays in managing materials, reducing carbon emissions, improving resource productivity, creating market opportunities, and driving local jobs and investment—while delivering positive circular economy outcomes in particular, using less resources more efficiently. Fundamental to this outcome, is the correct economic settings, which in Queensland includes a significantly higher levy rate than we have currently.

Unfortunately, it is WMRR’s overarching view that Queensland’s *Waste Management and Resource Recovery Strategy* has largely remained unchanged despite numerous recommendations since 2018 to make significant revisions including better use of data and evidence, and may explain why compared to other Australian states, Queensland currently falls short of national average resource recovery rate – hitting 59% compared to the 68% average, and well below the 80% target set for 2030 by the *National Waste Policy Action Plan*. The current strategy was released in 2019, identifying three (3) core priorities: building economic opportunity; reducing the

impact of waste on the environment; and transitioning to the principles of a circular economy to help retain the value of material in the economy for as long as possible. However, the strategy and its implementation have not, in WMRR's view, been evidence led with clear strategies and measures to best support these priorities, and as such WMRR would strongly advocate for the updated Strategy to have renewed focus on implementing specific measurable and time bound actions including developing and delivering a statewide infrastructure plan with targeted funding supports, utilising data led insights, incorporating a circular material approach emphasising producer responsibility and committing to developing ongoing markets for valuable recovered resources.

WMRR's comments made in response to the [2022 Strategy Review](#) remain relevant to this consultation. In particular, the need to *'develop evidence-based targets focusing on the entire waste and resource recovery system, all stakeholders and material types. Followed by clear and achievable actions'*. Furthermore, many of the recommendations made by the 2018 Queensland Treasury Corporation's [Economic Opportunities for the Queensland Waste Industry](#) and its further comments on the Strategy's [Key Performance Indicators](#), and the [2024 Review of the Waste Strategy](#) ("Waste Strategy Review") have not to date, been implemented. WMRR also notes that the Department of Environment, Science and Innovation acknowledged in their [response](#) to the 2023 Review of the End of Waste Framework (another key piece of work that remains outstanding) that one of the key findings was that *"There would be considerable benefit in a strategic Queensland Government-led approach to identifying potential resources that would support the State to meet the targets in the Queensland Waste Management and Resource Recovery Strategy. The current approach by contrast is reactive, and industry led. A proactive approach led by the Office of Circular Economy of the Department, and aligned to strategic policy documents and action plans, might see better uptake and impact."*

The 2025 Draft Strategy vision - to "reduce, reuse and recycle to unleash economic opportunity in Queensland:" is supported by the same, unchanged targets of the existing 2019 Strategy for the state to reach 90% landfill diversion, 75% recycling (with stream-specific targets of 70% municipal solid waste, 65% C&I and 90% C&D) and a 25% reduction in household waste by 2050. WMRR queries given how off track Queensland is, what will change given that there continues to be an obvious lack of granularity in the Draft Strategy – granularity that is required for a state like Queensland which has such a vast range of communities and which houses over 70% of its population in the south east corner (which is ~2% of the land area). Population, demographics, social and economic differences mean a differentiated approach is necessary to achieve recovery targets. Despite referencing investment in infrastructure and existing funding supports, there is no linking of funds to specific regions, targets or (apart from the \$2million three-point battery plan), material streams. This is problematic on many levels for WMRR – not only because there has been no analysis of infrastructure and end-market needs to address existing gaps (inevitably because there is not yet enough quality data), but following that, there is no way for the strategy to move forward and manage what it cannot measure.

In WMRR's view, waste reduction goals can only be achieved through genuine systems thinking. Despite high level alignment to the principles of the *Circular Economy Framework* (2024), little emphasis and attention has been given to the Queensland WARR sector as a contributor to the industrial supply chain and the significant role it plays in decarbonising Queensland and creating a circular economy. Given the urgent need to address climate change, and the legislated reduction targets, it is surprising that this review of the strategy does not incorporate carbon reduction measures, nor recognize carbon benefits. Similarly, there are no targets associated with increasing market uptake of recycled materials (i.e.: mandatory government procurement targets) or investing in market development for recovered products.

It is also questionable whether the desire to have less material to landfill is supported by the current levy settings, which see Queensland's waste levy significantly lower than the other Eastern states and with no forecasted levy increases to support the increased recovery targets. Existing rebates and offsets can be linked to the state's poor MSW recovery rates. Unless landfilling material is financially unattractive, well-meaning efforts to move to circularity and improved resource recovery will always be undermined. Low landfill levies also threaten the viability of developing alternatives to landfill which by their very nature are more capital intensive, such as Energy from Waste. It is difficult to show return on investment (ROI) when low cost landfill is in direct competition and there is neither regulatory certainty or a clear infrastructure investment strategy to provide certainty of incoming feedstock and markets for alternative infrastructure. The result being less jobs and less investment in Queensland compared with other Australian states.

Furthermore, the economic focus of the Draft Strategy refers primarily to jobs from recycling which is only one limited measure. WMRR believes the strategy should be focusing on the broader value of resources currently within the waste streams and harnessing economic opportunity, unleashing innovation and reducing the cost of living aligned with the opportunities afforded through the growth of remanufacturing and recovery to displace virgin products. This is much more than jobs - the cost and carbon savings as well as the economic benefits associated with displacing virgin materials, building onshore skills and resilience in existing supply chains should also be supported and measured.

As WMRR noted in its [2024 Election Priorities](#) for Queensland, *"...a paradigm shift must occur to seize the growth opportunities that the WARR industry provides as part of the broader industrial supply chain, given its role as a producer of secondary raw materials that can be manufactured into new products and placed back into the productive economy"*. This again requires the building of quality baseline datasets to inform decision making – and requires analysis not only of what waste has been sent to a recycling or landfilling facility, but must also look at where the material originated, where it was processed, what supply chains any recovered material entered into, and market share those end-products currently have and could have in the future.

Efforts that align with other states are to be encouraged, given that the market for recovered materials is often a national, or global one, and consistency across jurisdictions will aid market growth for recovered materials. WMRR has recommended enhanced circularity metrics in this response, and also supports the recommendation of the *Waste Strategy Review* to link the Strategy in an interactive website that forms the homepage for Queensland Government-led Circular Economy initiatives where the key priorities and actions in the Strategy provide the structure and linkages to communicate initiatives, programs, grants, funding, regulatory frameworks, data and priority products.

WMRR has provided responses to the consultation questions at [Annexure B](#), however would like to stress that the revised strategy should support a renewed focus on data led insights, emphasise producer responsibility and commit to developing ongoing markets for valuable recovered resources in Queensland.

Data Led Insights

i. Develop regional targets based on infrastructure and waste flows analysis

For Queensland to go further, faster, it is imperative that the strategy links to specific actions and priorities, backed by meaningful robust and contemporary data that can continue to be monitored and measured to evaluate the Strategy's progress. Deficiencies in current data is a barrier to achieving the state based targets as it is impossible to know where the real barriers and opportunities are across the state to meaningfully invest. The current lack of specific differentiated targets and approaches for the regions, underscored by the lack of

quality data available to support both the strategy and necessary investment, the lack of a strategic statewide infrastructure plan and regulatory settings that do not support enhanced resource recovery will continue to stifle the state's efforts to reach the state's targets.

The *Waste Strategy Review* highlights that the existing strategy does not provide enough differentiated actions or targets for rural and regional contexts and infrastructure needs, and this remains the case with the Draft Strategy. The WMRR consultation workshop highlighted our strong support for regional targets to be included within the revised strategy. Currently, statewide targets are in place and funding support is not designed in a manner that assists to achieve these, with funding allocated to develop regional plans that may not be able to be met due to size, scale, volume and markets. This places a burden on regions to apply for further grant funding when an opportunity is identified, write implementation plans and in many cases, be knocked back because they cannot meet the targets.

For example, a region like Wide Bay Burnett – which has a recovery rate of 34%, limited infrastructure and little access to recycled product markets, is unlikely to hit 65% recovery by 2030. To be effective, it is crucial that regions are not disincentivized from taking action due to unachievable targets and funding supports which are not specific – as there will be competing interests such as flood recovery. It is vital that a statewide infrastructure strategy is developed at first instance to support the statewide plan, that is then cascaded into regional actions and investment plans. Ultimately, the 'heavy lifting' will be done by South East Queensland (SEQ) due to the size of the population and material generated, enabling appropriate investment to be delivered assuming the settings support this.

Similarly, regional data is also needed to support regional avoidance targets, particularly for commercial and industrial (C&I) and construction and demolition (C&D) streams. Avoidance targets are currently only provided as a statewide target for avoidance of MSW waste. To achieve reduction goals, it would be prudent for benchmarking data to be captured showing C&I and C&D regional waste levels, and appropriate targets set for the avoidance of C&I or C&D waste streams. This again will help avoid setting unachievable targets that can disincentivise action. Whilst the existing state targets are generally supported by WMRR, there is an obvious need for systems lens to be applied by the State to evaluate how targets can be adapted according to supply chain and material flows in order that the state targets are met whilst cognisant of each region's current material flows, infrastructure, limitations and opportunities. These specific targets can then be linked to specific funding supports to bridge notable gaps in areas like appropriate infrastructure, access to affordable transport and opportunities for market development as part of the broader state strategy and infrastructure needs.

In preparing this submission, WMRR undertook desktop analysis to help articulate the need for a systems lens to be applied to the revised strategy by recognising the varying needs of the different regions (see [Annexure A](#)). The table highlights that whole of state analysis (in grey) tells a very different story to each of the regions. Whilst this data is not verifiable, given the different dates of publication and source methodologies, this high level data nonetheless highlights that there will be an obvious variance in the capacity and capability of each region, noting the varied economic industries, populations and transport access which is inextricably linked to the material streams and volumes, and which will again be impacted by the current waste infrastructure access, therefore whilst the state overall must meet the existing targets, we believe that there must be different targets for regional and rural as a result of these differences.

When evaluating the data available on Queensland Government websites – primarily the Regional Development Plans and consultation documents - the lack of consistent metrics and reliable data available was noted.

Different sources report at different times, often using different methodologies, leading to gaps and inconsistencies. This inconsistency makes it difficult to conduct accurate analysis. To improve reliability, Queensland must adopt a standardised approach to reporting, ensuring data alignment across various sources.

ii. *Develop and implement a whole-of-government coordinated statewide WARR Infrastructure Plan*

The Draft Strategy references the \$231 million allocated to implement regional waste management plans – purportedly to support flexible, for purpose local solutions and to enable regional leadership in job creation and economic development. However, this approach lacks the systems thinking that WARR is part of an integrated value chain and not all regions will have the regional capacity, economic or material flows to deliver on these targets alone. In WMRR’s view this regional planning has provided an additional barrier to progress. Regions have used different metrics and are bound by procurement processes under local government regulation that can thwart effective change. A systems lens needs to be applied by the State, to evaluate where infrastructure investment can be made to have the most meaningful impact so that the state targets are met.

A robust, long-term infrastructure plan—underpinned by a comprehensive 'fates and flows' analysis—must identify critical needs such as transfer stations, recycling hubs, and advanced waste treatment (AWT) facilities. This includes regional and metropolitan planning, with a focus on hubs and spokes models near viable end markets. Such planning must go beyond local government and include the private sector, which manages the majority of waste, especially in the commercial and construction sectors. A strategic State WARR Infrastructure Plan (“State WARR Infrastructure Plan”) will communicate short to medium term investment priorities and indicate to industry and investors the key focus areas and sequencing of actions in order to act with greater certainty. This approach has been used by Victoria - with the development of their State Waste and Resource Recovery Infrastructure Plan, known to them as the SWRRIP, signaling investment in EfW in regions where landfill capacity could not meet the demands of residual waste flows.

Importantly, particularly in the context of remote communities, any resource recovery – including energy recovery - must be recognised as being a higher order use than the existing burial, disposal or stockpiling practices and should be prioritised. For example, high volumes of specific materials that are specific to remote and regional mining communities (such as End of Life Off the Road Tyres), should be identified and addressed by the plan. Having evidence led data that is specific to regional waste flows will best enable secure investment in higher order recovery. The State WARR Infrastructure Plan must be State Government led and directly linked to priority funding to meet capacity shortfalls, increase access to markets for recovered products and maximise economies of scale to deliver best value to Queensland residents. This can then be implemented by the regions with appropriate specifically targeted funding supports from the state.

iii. *Review the Levy Settings to promote circular infrastructure investment*

Queensland reintroduced the Levy in 2019, however, to date it has not been utilised as yet to maximum effect - recovery rates remain low and there has been limited progress towards investment in alternatives to disposal, such as organic processing and Energy from Waste (indicating that the levies are not high enough to promote and de-risk long-term investment in recycling or energy recovery technologies). The offsetting of waste levy costs for councils by way of annual advance payments has not helped, and as such WMRR supports the agreed program for reducing these.

Increasing the levied amount (for example to at least address disparity with other Eastern States), as well as reconsidering exemptions and discounts should be considered as part of this review of the Draft Strategy, noting that the state’s infrastructure needs analysis will determine where alternatives to landfill need to be prioritised.

It is crucial that landfilling does not undermine pathways to recovery by being considerably cheaper. Forecasting the levy for a five (5) year period, in alignment with the Strategy milestones, would also enable more certainty in financial modelling for new WARR infrastructure investment. Due to the risk of interstate and inter-region movement of waste material, implementing a waste tracking system would also be in alignment with waste levy and strategy reviews. Incorporating this analysis will enable better understanding of waste generation and management patterns. Overall, such a system would enable much more accurate data capture across the state of diversion targets.

The upcoming Levy review noted in the strategy should also include implementing Recommendation 22 of the [Economic Opportunities for the Queensland Waste Industry](#) Final Report to “...identify clear KPIs to monitor the performance of the landfill levy and provide transparent reporting on the link between the money raised, monies invested, and outcomes achieved”. This would enhance public confidence in the WARR sector and the government’s commitment to transitioning to a circular economy,

iv. C&I should be prioritised

WMRR has already commented on the need for regional data for this stream to be captured to support the strategy in order that appropriate regional targets can be developed. Only 53% of C&I waste was diverted from landfill in 2023, having peaked at 55% in 2021. In 2009, this rate was higher at 58%¹. There has been a strong emphasis to date on MSW in Queensland with limited to no strategies targeting this stream which according to the most recent national waste data requires a further 835,000 tonnes to be recovered by 2030 in order to meet the 80% recover targets. Recently we have witnessed NSW for example set mandatory targets for organic diversion in C&I not just MSW, which WMRR believes is vital not just to meeting targets but providing regulatory certainty to industry around feedstock and investment. Queensland must look also at how we can increase recovery in this stream and what investment and policy actions are required as only 50% of the necessary volume arises from MSW. The WMRR Consultation Workshop highlighted that depending on region, some C&I streams – despite being source separated – have no feasible option other than landfilling. There are clearly opportunities to improve material efficiency through waste avoidance and greater recycling from the C&I waste stream including food only collections and processing, packaging waste and timbers.

v. Long term commitment to encouraging broadscale behaviour change emphasising waste avoidance

As noted earlier, the message of “less landfill, more recycling” focuses on end-of-pipe management of waste streams and does not focus on responsibility for design, avoidance and consumption behaviours. For a circular economy to thrive, emphasis must be placed at the start of the value chain – not just in terms of making producers responsible for the materials they put on market, but also by driving smart consumption behaviours wherein preference for recovered materials over virgin is directed in consumer messaging and in the preferred procurement of recycled/recovered materials instead of virgin products by both producers and governments. The WMRR Consultation Workshop confirmed that the Draft Strategy should focus more on MSW reduction and avoidance. This cannot be simplified down to funding supports for local governments to implement their own education campaigns that simply “inform” about source separated collection services without addressing the barriers to participation to the desired behaviours. Increasing public awareness about supply chain thinking, (rather than end-of-life linear thinking) to drive circular outcomes involves investing in the infrastructure to facilitate the desired behaviour change (source separation) and investing also in the development of end markets for recovered products to drive uptake and build confidence in recovered materials. Other states have addressed similar challenges and identified key supports to address them. For example:

¹ [A study into commercial and industrial \(C&I\) waste and recycling in Australia by industry division](#), DSEWPC, 2012, p 32.

- where organics services are rolled out, the barrier to meaningful participation comes down to putting the material in the right bin at kerbside, so it would make sense to focus on the message that that source separated organics collection will result in cleaner, higher quality composts being put on market along with market. This was the approach taken under the *NSW Waste and Sustainable Materials Strategy 2041 (Stage 1: 2021–2027) ('WaSM')* which committed \$65 million over five (5) years to support organics collection and processing and funding new processing facilities and a statewide education campaign to change household recycling habits;
- for batteries, the lack of accessible collection points is a major barrier to the desired behaviour. Mandatory EPR and product stewardship – such as that proposed by the *NSW Product Lifecycle Act 2025*, would address this issue, with government supports to enable equitable access across the state;
- improper disposal of household chemicals was another area of priority identified by WMRR Branch members in the Consultation Workshop. To facilitate behaviour change for this same issue in NSW, \$50+ million was assigned under the WaSM to maintain and expand Community Recycling Centres and Household Chemical Cleanout programs for hazardous waste;
- Uptake of recycled materials and products was addressed in large part in Victoria by the creation of EcologiQ that purchased recycled materials and products on behalf of government projects.

The preference for waste avoidance must also be emphasised through producer responsibility and a commitment to developing end markets for recovered products. These will also underscore widespread behaviour change that optimizes circular outcomes.

Increased emphasis on producer responsibility

i. Development of mandatory stewardship programs as well as extended producer responsibility obligations

Voluntary product stewardship schemes have been met with little success both nationally and in Queensland. For example, the Australian Packaging Covenant Organisations (APCO) failed to meet its 2025 national packaging targets including 100% recyclable, reusable or compostable packaging, and B-cycle which covers a limited range of batteries, excluding lead acid and embedded batteries, only recovers 15% of covered batteries placed on the market. In line with the Draft Strategy's focus on partnerships, mandatory product stewardship schemes should be developed with appropriate financial responsibility on product manufacturers and distributors, allowing for the additional challenges of operating schemes in regional areas. WMRR encourages Queensland to follow NSW's lead in establishing a legislative framework for a mandatory product stewardship scheme for specified products. The *Product Lifecycle Responsibility Act 2025* provides the NSW Government with the necessary regulatory tools to oversee stewardship organisations and enforce requirements across a product's entire lifecycle – from design and production through to recovery and disposal.

WMRR contends that mandatory product stewardship, particularly for priority and problematic waste streams such as mattresses, solar PV, batteries and packaging, should be explicitly mentioned in the strategy, with an approach of designing equitable schemes that meet the needs of the different regions and appropriately linked to specific funding supports. Using data led insights should help develop solutions noting that sufficient processing infrastructure and markets must be established to avoid aggregation and stockpiling of these materials. We need to ensure that any scheme developed does not simply become a collection and aggregation scheme. It is also vital that the consideration of these schemes is strategically led by the government so as not to undermine the viability of existing council-run Materials Recycling Facilities (MRFs).

The setting of targets for the increased recycling of discarded products that were often not well designed, contained little to no recycled content and do nothing to increase material productivity will continue to fall short of creating a system that generates less waste and reduces environmental impacts. Circularity and designing out waste will eventuate if materials placed on market are safe and suitable for circulation and not designed for single use. Government leadership is essential to set clear policies and regulations that mandate safe, circular design and extended producer responsibility, ensuring materials are fit for recirculation and not destined for landfill. WMRR recommends mandatory Extended Producer Responsibility (EPR) legislation for materials that require management and funding at end of life.

For example, as indicated by both high level data analysis and within the WMRR Consultation Workshop, many regions across Queensland are facing challenges with the recovery of mattresses and whitegoods, as changes in product design have reduced recyclability of some of these products – i.e.: the inclusion of plastic components in pocket spring mattresses are now considered contaminants for metal recycling,, resulting in increased dumping and landfilling. Well intentioned product stewardship and recycling efforts will have no effect if products are not designed for recovery. Targeted circular strategies for these problematic materials are needed to improve recovery.

Transparent, properly funded schemes for problematic materials such as soft plastics, packaging, oil containers, tyres, batteries, and solar panels should be developed if Queensland is genuine in its pursuit of 2030 targets and transitioning to a truly circular economy. Ensuring that the creators of products are responsible for designing in a manner to ensure that they can be safely and effectively reinvested in the circular economy is key not only for the WARR industry, but for the safety and health of the greater Queensland community.

Ongoing Market Development

i. Implement the recommendations of the End of Waste Framework Review

It is difficult to “harness economic opportunity” from recovered resources when there is a high degree of uncertainty across all levels of government and industry stakeholders as to the definition of ‘waste’ and pathways that may create a resource from ‘waste’, and/or product design does not aid beneficial recovery. The 2023 End of Waste Framework Review (“*EW Framework Review*”) made 37 recommendations to address the existing challenges for recovering material streams for reinvestment back into the circular economy. To date, it is unclear what progress (if any) has been made. In particular, the review highlighted that the government’s approach to addressing emerging contaminants and legacy materials must be considered in the context of a circular economy and their impact on the recovery of materials for reuse and recycling.

Contaminants are heavily regulated in recovered resources but often not regulated in new/ virgin or imported products. It is crucial that the Queensland Government presents an appropriate level of risk management and environmental protection whilst permitting the safe reuse of recycled material. This is essential to the success of Queensland’s circular economy. Particular items of note include PFAS, batteries, CCA, microplastics and nano plastics, and household chemicals amongst other hazardous materials. For example, the current approach to managing PFAS (and derivatives) in waste and waste derived products (e.g., compost) does not facilitate long-term investment in recycling and recovery technologies, meaning more material will go to landfill than necessary. The presence of PFAS in the environment is ubiquitous due to the widespread unregulated use of PFAS for industrial and consumer applications. Regulating its detectability at the end of the recycling chain should be cognisant of the PFAS levels already acceptable for broader consumer and industrial applications, rather than being set so low that it is impossible for WARR processors to attain.

The EOW Framework Review recommendations are also important to consider in line with the Draft Strategy, and the progression of a State WARR Infrastructure Plan. Whilst the *Waste Reduction and Recycling Act* was updated in June 2023, there is a high degree of uncertainty across all levels of government and industry stakeholders as to the definition of ‘waste’, and pathways that may create a resource from ‘waste’. This is prohibitive to resource recovery and the success of Queensland’s circular economy. In particular, an EOW Code should be developed for IBAA to provide some certainty for EfW investment in Queensland and contribute to recovery rates. The revised strategy must be cognisant of these pathways and ensure that the regulatory settings support increased resourced recovery.

ii. Review the organics strategy

Whilst identifying the need to boost kerbside recovery of organics (currently under 50%), the current organics strategy does not articulate opportunities to improve collection systems or identify the current market barriers (i.e. PFAS restrictions on outputs and failed funding for FOGO implementation). As noted in relation to C&I, commercial food waste should also be prioritised, especially given the strength of tourism and hospitality in the state.

iii. Government-led Market Development

Given the lower than average recovery rates, it would be prudent for Queensland to establish a dedicated market development body, similar to Sustainability Victoria or Green Industries SA, to drive demand for recycled materials and support remanufacturing. The [Queensland Treasury Corporation \(QTC\)](#) recommended greater transparency and efficiency in how levy funds are used, and WMRR supports creating a ring-fenced fund and independent agency to lead market development that is separate to regulation and enforcement, and could in fact go further to have responsibility for delivering the statewide infrastructure strategy and reporting on the effectiveness of the strategy.

iv. Government procurement of recovered materials

The Queensland Government must lead by example—mandating minimum recycled content in all government procurement, including civil and capital works, and funding sustainable purchasing initiatives particularly as Queensland heads towards delivery the Olympic Games in 2032. A statewide directory of contractors using recycled materials, supported by standards and clear specifications, would build confidence, encourage uptake, and grow end markets. WMRR also calls for a program like Victoria’s EcologiQ to drive uptake of recycled content in public projects and recommends mandatory reporting on recycled material use across all levels of government. The upcoming Olympics would provide an immediate opportunity to implement such a policy. Stronger alignment to the Department of Transport and Main Roads (TMR) [Waste 2 Resource Strategy](#) – which currently sits under TMR’s Environmental Sustainability Policy, is needed. We have seen from the success of the *Recycled First* policy in Victorian Road Infrastructure projects that these initiatives can stimulate demand for locally recycled material.

WMRR reiterates the obvious need to consider the difference between SEQ and regional Queensland and undertake statewide data analysis to underscore the development of a strategic State WARR Infrastructure Plan and the setting of appropriate regional targets to support the existing state targets. The strategy must then go further – identified targets do not guarantee that the desired outcomes will be achieved. Using meaningful data from across the state should enable effective and coordinated implementation of action plans and funding supports to deliver the strategy’s outcomes and targets. Economic metrics (such as infrastructure or market development spend, private investment, and allocation of waste levy funds) would also benefit from being



tracked as the strategy is reviewed, so that the effectiveness of the enablers can be linked to progress towards the targets.

WMRR's responses to the consultation questions can be found at [Annexure B](#). Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

Table 1: WMRR – Desktop analysis of Queensland’s regional resource recovery using publicly available data

Region	Population	% of QLD Population	Size (km ²)	Recovery Rate (%)	Key industries	Transport	Noted Problematic Materials	Key Challenges
QLD (Whole of State)	5,608,666	100%	1,723,030	59%	Varies across the state but mining, agriculture and tourism are primary economic contributors	Varies across the state	E-waste (<40% recycled); hazardous waste; illegal dumping.	1. Population growth; 2. Varying landfill capacity; 3. Costly transport; 4. Scale issues due to population density extremes.
South East Queensland (SEQ)	~4,000,000	~71.3%	35,000	57.86%	Finance, tech, education, tourism, logistics, health	M1, M3, M5 Motorways; Brisbane Airport; Port of Brisbane; extensive rail and bus networks	Battery and vape fires (>200/year in Brisbane); limited green waste collection.	1. Low engagement and willingness to pay; 2. Ageing infrastructure; 3. Vulnerable transport; 4. Tourism waste load.
Far North QLD (Cairns)	301,256	~5.4%	380,748	51.85%	Tourism (Great Barrier Reef), agriculture (tropical fruits), mining	Cairns Airport (intl); Bruce Hwy; Ports at Cairns, Weipa; regional rail	Mattress dumping; lithium-ion battery fires.	1. Landfill capacity issues; 2. low scale for processing; 3. lack of commercialisation and incentives.
Wide Bay Burnett (WBB)	276,752	~4.9%	310,728	34.22%	Agriculture (sugar, nuts), tourism, construction	Bruce Hwy; Bundaberg & Hervey Bay Airports; Port of Bundaberg	Bulky goods, e-waste, medical waste dumping; pollution in waterways.	1. No local recycling markets; 2. Limited infrastructure; 3. Slow economic growth (ageing workforce; high unemployment).

Region	Population	% of QLD Population	Size (km ²)	Recovery Rate (%)	Key industries	Transport	Noted Problematic Materials	Key Challenges
Greater Whitsundays (GW)	186,643	~3.3%	90,354	55.56%	Coal mining, sugar farming, Whitsunday Islands tourism	Bruce Hwy; Mackay & Whitsunday Coast Airports; Abbot Point, Hay Point ports	Mattress and battery waste; dumping polluting waters and reefs.	1. Reliance on volatile mining sector; 2. Limited land for recovery precincts.
Darling Downs South West (DDSW)	292,481	~5.2%	410,129	44.12%	Agriculture (cotton, grains), energy (gas), manufacturing	Warrego & New England Highways; Western rail; Toowoomba Wellcamp Airport	Mattress recovery (100–130/week); agricultural waste.	1. Dispersed populations; 2. Land use competition; 3. Lack of skills/infrastructure for scale.
North Queensland (NQROC)	28,957	~0.5%	319,808	48%	Mining (copper, zinc), cattle grazing, agriculture (sugar, bananas), tourism	Bruce & Flinders Highways; Port of Townsville; Townsville Airport; North Coast rail line <i>North West</i> : Barkly & Flinders Highways; Mount Isa Airport; rail link to Townsville	Abandoned vehicles; ageing solar panels.	1. Very remote with seasonal populations; 2. High transport costs; 3. Low waste volumes; 4. Limited facilities.

Region	Population	% of QLD Population	Size (km ²)	Recovery Rate (%)	Key industries	Transport	Noted Problematic Materials	Key Challenges
Central QLD (CQROC)	249,020	~4.4%	117,549	44.83%	Mining (coal), beef agriculture, education, manufacturing,	Bruce & Capricorn Highways; Rockhampton Airport; Gladstone Port; rail infrastructure <i>Central West:</i> Capricorn & Landsborough Highways; Longreach Airport; “Spirit of the Outback” rail service	Contaminated recovered materials; high organic landfill content.	1. Dispersed urban centres; 2. Lack of large-scale recycling; 3. Poor organic waste management.

Questions for Consultation:

Question	WMRR comment
How can the Queensland Waste Strategy better achieve waste avoidance measures and outcomes?	WMRR reiterates the comments made in its cover letter that waste avoidance measures and outcomes need to be more specific than the current approach of setting state targets for headline waste. There is an obvious need for the avoidance targets to articulate avoidance opportunities for C&I and C&D waste streams, and for organics across all three (3) waste streams. Meaningful data gathered from across the states should inform specific regional targets, with each regional target being considered together to achieve the state target. Regional based data for each waste stream, broken down into waste type, will show which waste types are not being avoided, and help direct specific action and investment to achieve the most significant waste reduction. <i>Avoidance targets currently only address MSW</i> Currently, avoidance targets only refer to MSW reduction per capita, and there is no target for the avoidance of C&I and C&D waste. Metrics to measure C&I and C&D waste avoidance should be included and would need to be done by region and waste type (i.e. food, residual, green organics, metals etc.) and then aggregated to form state targets. <i>Revised levy, policy and funding settings are needed to keep materials out of landfill</i> Queensland requires an increased levy to reflect the true cost of processing materials and keeping them out of landfill. At present landfill remains too cheap making it difficult for capital intensive processes to complete. Further given that organics amount to approximately 50% of all kerbside material being landfilled, this should be a priority for the strategy. To incentivise local governments to implement a kerbside organics service, there must be supportive regulatory settings for the development of end product markets, as well as behaviour change actions to reduce consumption behaviours. The existing funding mechanisms have not delivered and need a complete review. The <i>Growing Recovery of Organic Waste via Food Organic and Garden Organics</i> (GROW FOGO) funding programs has failed to achieve the desired outcome of enabling councils to provide a kerbside FOGO service. As it currently stands, no Council within the state has a permanent kerbside FOGO service. Those that have implemented a kerbside organics service have opted for GO only – a nod to the perceived risks of implementing FOGO. Furthermore, no regional Council has implemented any permanent organics service. The current regulatory settings for organics processors are threatening the viability of removing organics from landfill by 2030 and undermined funding efforts to encourage uptake of separate FOGO collections. <i>Specific and targeted behaviour change funding is needed to reduce consumptive behaviours</i> State Government created and funded programs with consistent statewide messaging could help prioritise reduction by households and business. Programs could for example focus on:

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	• Reducing food waste within the household (i.e.: Love Food, Hate Waste) • Reducing food waste within your business • Reducing residual waste in the red lid bin (both domestic & commercial) • Refusing / avoiding waste when shopping Broadscale behaviour change funding, can also help drive further avoidance of waste, looking at themes such as: • Rethinking purchases and needs • Reusing what we have or finding another purpose • Purchasing for multi-purpose sustainability • The provision of targeted funding support for reducing and reusing materials aimed at establishing or improving the following facilities where services could be provided to encourage reuse/repair rather than buying new for example, reuse shops, upcycle workshops, share libraries (tools, books, toys, bikes), and repair shops (mowers, furniture, white goods etc.) <i>Specific Purpose, Ongoing Funding Supports</i> Current funding for Behaviour Change such as the <i>Let's Get It Sorted</i> (LGIS) Partnership and funded coordinator positions have expiry dates within three years and many smaller, remote local government areas do not have any resources to implement programs detailed within regional behaviour change implementation plans. It is apparent that limited staffing and financial resources of the regions is undermining progress. This can be seen from the delays in delivery of the regional plans, appointments of the coordinators, and the continued difficulties faced with obtaining infrastructure funding to enable behaviour change (via source separation). Funding supports need to be ongoing and targeted to purpose. To ensure that Queensland meets the targets under the strategy, the funding opportunities provided by the state should align with a State WARR Infrastructure Plan.
Are there any changes needed to the draft new Queensland Waste Strategy to reflect the challenges in	Yes –as WMRR articulated in its cover letter to this submission, the revised strategy currently lacks any commitment to reducing the impacts of carbon or developing markets for recovered materials in support of transitioning to a circular economy. To achieve these outcomes, which underpin the state targets including net zero and 80% resource recovery by 2030– the strategy should: • Include specific, differentiated regional targets and specific actions for implementation, linked to the development of a strategic state WARR infrastructure plan. This will articulate where meaningful opportunities exist to increase recovery and develop viable markets. WMRR has detailed this in the previous question.

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meeting some targets?	- Enhance producer responsibility through mandatory EPR and product stewardship schemes for problematic materials that require management and funding throughout and at end of life. - Include a focus on the development of markets for recovered materials. It is not enough to leave it to the WARR industry to try and find markets for recovered materials that compete with the status quo preference for virgin materials. Circularity needs to be supported and led by government, and this must include mandatory government procurement of recovered materials and state investment in market development. These recommendations echo previous feedback provided to the Queensland Government for prior strategy reviews for at least the last seven years, which unfortunately, remain unactioned. In particular, the 2018 recommendations from QTC's review of the Waste Strategy Key Performance Indicators, WMRR's 2022 and 2023 submissions, and the <i>July 2024 Waste Strategy Review</i> all call for similar changes to be made. <i>The revised strategy should keep the existing state targets, but also set differentiated targets across waste types, streams and regions</i> To improve the effectiveness of the strategy, targets should be: - Regionally differentiated and broken down into waste types (ie metals, organics, residual etc), reflecting the unique capacities and constraints of different areas. It must - Include specific waste reduction and avoidance targets for the C&I and C&D sectors, encouraging upstream solutions and more sustainable business practices. - Include market uptake targets for recovered materials to displace the use of virgin products. These will be different for each region depending on the waste flows and infrastructure and markets available. - Include of carbon reduction targets to align with Net Zero by 2050. Again, these should be differentiated for each region to ensure targets - although ambitious - remain achievable and motivating. - Backed by specific allocated funding and infrastructure support, especially in areas where the cost of diversion is higher and where targeted investment will maximise recovery of products with accessible end markets. - Regularly reviewed and adjusted, based on emerging technologies, market conditions, and performance data. WMRR includes the following additional comments below, which reinforce the above recommendations: <i>Differentiated targets will harness the unique economic opportunities within each of the regions.</i> One of the main challenges is that the current targets are applied uniformly across the state, despite significant differences in infrastructure, market access and economies of scale. SEQ benefits from a more mature recycling and resource recovery industry, greater commercial interest, and proximity to end markets. In contrast, regional councils and industry face barriers that make it difficult to achieve the same diversion and recycling

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	outcomes. A revised approach will see that more capable regions (such as SEQ) have higher targets to do “the heavy lifting” whilst the regions targets may be lowered in some areas so as not to discourage participation in resource recovery and diversion activities. Specific targets by waste stream will also help inform areas where funding supports can generate maximum return, noting that: • <i>Investment in infrastructure will need to consider the entire WARR supply chain for the region</i> As noted in the cover letter, there are significant gaps in the existing data relied on and referenced in the Draft Strategy. Currently, most recycling and processing infrastructure is concentrated in SEQ. Further, at present, the landfill levy and disposal costs in regional areas are too low to encourage businesses to separate and recover these materials. However, some of these regions have access to end markets for the recovered material from C&I, and also potentially, C&D waste streams. Table 1 highlights that there are R7 councils which have strong ties to agricultural markets for compost offtake, or are located in proximity to heavy industrial areas (ie: Gladstone, Rockhampton) where metals and recovered timbers are valuable commodities. Targeted funding supports to encourage separation, recovery and market uptake, such as investment in infrastructure for processing, subsidising high transport costs to access end-markets, and increasing the landfill levy, would encourage behaviour change from businesses so that they don’t dispose of these materials. • <i>Higher order recovery should be referenced throughout the strategy</i> The State WARR Infrastructure Plan should identify existing assets, explore opportunities for collaboration, and support shared solutions in regional areas, including opportunities to invest in infrastructure that promotes higher order recovery, such as Alternative Waste Treatment (AWT) and Energy from Waste (EfW) facilities. This aligns with the strategic focus on improved environmental outcomes. These solutions are not currently viable in many regional areas as they are difficult to develop without economies of scale, long term funding and secure regulatory and policy endorsement. Certainty for investors through the State WARR Infrastructure Plan and targeted funding under the strategy would address the current issue of local governments lacking the resourcing and funding to develop such facilities within their regional plans, as well as acting as a conduit to include collection points and aggregation points within the containers for change network that should form part of the broader WARR system throughout Queensland, enabling these sites where appropriate to be used to separately collect other products such as batteries, soft plastics, e-waste. • <i>Market opportunities can be regionally specific</i> For example, areas like SEQ with higher volumes of C&I produced due to the size of the hospitality industry, solutions such as food donation (which can be readily accessed in proximity) could help reduce the amount of food going to waste. Similarly, analysis of the C&D sector may demonstrate

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	opportunities for soils to be recovered and reused from excavation, rather than landfilled. Regional analysis will enable barriers (such as appropriate receival facilities) and opportunities (such as access to appropriate markets) to be identified. <i>Funding mechanisms need to be tied to specific differentiated targets including targets for market uptake of recovered products</i> It will not achieve the best outcome to make regional councils compete with metropolitan councils for the same funding pools, knowing that they lack the volumes and access to end markets to make recovery infrastructure more viable than a facility in SEQ. When determining funding amounts for specific regions, modelling (for return on investment) should look at the cost of investment against the forecasted reduction of waste types and the forecasted increase in recovered materials entering supply chains. With reference to priority products and problematic materials, the strategy should look to enhance producer responsibility. Voluntary and co-regulatory product stewardship schemes are underfunded and inconsistently applied, especially disadvantaging smaller councils. WMRR urges Queensland to introduce mandatory product stewardship legislation, similar to NSW. This is discussed further in the following section in relation to problematic waste streams.
Are there other data or metrics that need to be collected to effectively measure progress against the Queensland Waste Strategy targets?	Yes. WMRR has included detail in its cover letter about the need for additional data to be collected so that the strategy can be revised to keep the existing state targets, but also set differentiated targets across waste types, streams and regions. This requires the government to undertake a detailed analysis of the WARR sector that goes beyond simple diversion and recovery rates. To transition to a circular economy, the unique nuances of each region including waste types, waste streams, recovered product end markets and existing available infrastructure should be benchmarked. This data will inform the State WARR Infrastructure Plan, design specific material action plans and implement differentiated targets. Further analysis could be undertaken to establish a baseline for current carbon abatement, and this metric should continue to be used to monitor progress towards Net Zero. To improve the effectiveness of the strategy, targets should be: - Regionally differentiated, reflecting the unique capacities and constraints of metro and regional, areas. - Backed by funding and infrastructure support, especially in areas where the cost of recovery may be higher. - Regularly reviewed and adjusted, based on market conditions, and performance data. - Include specific waste reduction and avoidance targets for the C&I and C&D sectors, encouraging upstream solutions and more sustainable business practices. - Inclusive of market uptake targets for recovered materials to displace the use of virgin products. These will be different for each region depending on the waste flows and infrastructure and markets available. WMRR would like to see the strategy set a target for the uptake of recovered materials in Queensland supply chains. This should be supported by mandatory recycled material thresholds in government procurement contracts, which can drive uptake of recovered materials over virgin materials. This goal could be facilitated by specific funding

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	to establish a market development agency like Victoria's EcologiQ and stronger alignment to the Department of Transport and Main Roads (TMR) Waste 2 Resource Strategy – which currently sits under TMR's Environmental Sustainability Policy. Inclusive of carbon reduction targets to align with Net Zero by 2050. Again, these should be differentiated for each region to ensure targets - although ambitious - remain achievable and motivating.
Are there other priority products or materials that should be included in the priority products and materials list?	Yes. There are additional materials and product categories that warrant inclusion due to their growing impact, management challenges, and potential for improved diversion outcomes: - Commercial and Industrial (C&I) Waste: C&I waste represents a significant portion of the waste stream, yet it is not explicitly listed as a priority. Given the limited influence local governments have over this stream and the lack of viable diversion pathways in many regions and the significant volume that is produced in Queensland targeted action is needed to address C&I waste generation, separation and recovery gaps. - Household Recycling: Improving the quality and consistency of household recycling remains a critical challenge, particularly in regional areas. Contamination, limited education, and outdated infrastructure hinder performance. Elevating household recycling as a priority would support investment in education, kerbside services and MRF infrastructure. - Large Lithium-Based Batteries: Current battery programs primarily target small household batteries. However, larger lithium-based batteries such as those used in e-bikes, power tools, and solar storage pose significant safety, environmental, and cost challenges. These batteries are expensive to manage, with limited processing options available, and local governments are often left to bear the cost at end-of-life. WMRR has already referred to the NSW legislation that it would like Queensland to mirror, which will enable the state to introduce regulations to address these e-micromobility batteries. - Mattresses and White Goods: Changes in product design have reduced the recyclability of these items. For example, pocket spring mattresses are now considered contaminants in metal recycling due to the high volume of non-metallic materials. These items are increasingly being landfilled and targeted strategies are needed to improve design, recovery and processing. Similarly, white goods, such as fridges and washing machines, increasingly contain non-metallic components, making them less suitable for traditional metal recovery streams. Again, adopting a legislative framework mirroring the <i>NSW Product Lifecycle Responsibility Act 2025</i> would enable mandatory EPR regulations to be introduced to address these and other problematic waste streams. - Commercial Food Waste: There is currently limited uptake of food waste diversion programs among commercial businesses. A targeted focus on this sector, including incentives, regulation, and infrastructure support, could unlock significant diversion potential.

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Do you support continuing to develop action plans that support the draft new Queensland Waste Strategy?	Yes – WMRR believes that action plans need to be material focused (across all streams) to account for the different pathways and infrastructure available. Economic and environmental factors particular for the region may limit what can be achieved and require specific action. Bespoke action plans must be focused on: ○ Encouraging behaviour change, in particular where waste can be avoided (e.g. food waste and other consumption behaviours) ○ Developing stable, local end markets for recovered resources. ○ Targeting infrastructure that produces high-quality, market-ready outputs. ○ Aligning infrastructure with downstream manufacturing needs (e.g., glass sand in roads, recycled plastics in products). Action Plans that are regionally responsive and economically inclusive will help Queensland build a statewide waste and resource recovery management system that transitions towards a circular economy.
What are the barriers to establish technologies to process problematic waste streams?	The main barrier to establishing technologies for problematic waste streams is the lack of sustainable design of these materials, and generator responsibility including creation of end markets. The current approach of government towards managing challenging material streams is problematic and time consuming as it requires case by case intervention. WMRR encourages Queensland to follow NSW's lead in establishing a legislative framework for a mandatory product stewardship scheme for problematic waste streams. The <i>Product Lifecycle Responsibility Act 2025</i> provides the NSW Government with the necessary regulatory tools to oversee stewardship organisations and enforce requirements across a product's entire lifecycle – from design and production through to recovery and disposal. i.e. creating by default a real paradigm of extended producer responsibility (EPR). In the WMRR Consultation Workshop, aside from organics and residual waste, participants identified batteries, solar panels, and mattresses amongst some of the most problematic materials to manage. These products could be regulated under such a legislative framework. Utilising the data from the regions should identify where to place suitable infrastructure to support these schemes so that access is equitable for Queenslanders. With regard to residual waste, the role of AWT and EfW in the context of the state's broader materials management scheme in accord with the waste management hierarchy should be articulated in the strategy. Queensland has no clear pathway for waste and resource recovery infrastructure planning that identifies residual waste treatment facilities across the state required to meet current and future waste needs, and as the strategy states we want less landfill, i.e. no new landfills, to do this we need a clear pathway. This is why WMRR keep reinforcing the need for the State WARR Infrastructure Plan to be developed based on benchmarking existing needs and opportunities for each of the regions and future investment direction.

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What national reforms/ harmonisation measures do you support or not support, in terms of the benefits or costs to Queensland businesses, councils or Queensland more broadly?	WMRR supports national alignment wherever possible, noting that Australia is one (1) common market for most materials and products. For the circular economy to thrive, both within each state and nationally, it is imperative that market conditions for recovered products enable them to be cost competitive and developed safely at scale to reach national markets. Individual jurisdictional approaches can limit opportunities for recovered products and make them unviable. Harmonisation or aligning with other states will ultimately benefit Queensland by strengthening its role as a producer of high value recovered materials, which can be reintegrated into the national circular economy. In particular, alignment should be sought where in relation to: • Mandatory product stewardship for problematic materials (as already discussed in relation to having states adopt mirror legislation to the <i>NSW Product Lifecycle Responsibility Act 2025</i>.) The current voluntary and co-regulatory models are not delivering consistent or equitable outcomes, with inadequate funding and limited geographic reach, disproportionately impacting smaller and regional councils. These councils are expected to contribute significant resources to participate, despite lacking the capacity and support to do so effectively. A mandatory approach would ensure a level playing field, drive greater accountability from producers, and deliver more reliable outcomes across all jurisdictions. • National packaging reform, comprehensive packaging reform: Packaging design must be simplified to prioritise recyclability and the use of recycled content. • Levy settings – this is further discussed in a later section, noting WMRR supports the Eastern States in particular, to be closer in levy rates to encourage waste to be managed in proximity to its origin. • Market development for End of Waste Codes for byproducts from EfW, such as IBAA • <i>Establishing agreed safe levels of chemical and physical contaminants</i>- This is particularly in the case of PFAS levels, which can be impacted by scope creep of input materials into source separated organics collections (especially with regard to food packaging). It is WMRR's firm view that there is a crucial role for government to play in mandating product standards in order that pollution and chemical contaminants can be designed out of product supply chains in so far as possible. This is particularly important given Australia's transition to a circular economy and mitigating the risks of PFAS and other chemicals of concern in the environment. Given that the industry is flooded with guidance or State of Knowledge documents such as the NEMP 3.0, <i>Biosolids Guidelines for NSW</i> and AS4454 product standards, WMRR supports aligned efforts to establish clear and certain thresholds for contaminants, such as PFAS, in order that materials can be recovered that are fit for purpose. Lack of national consistency just causes more uncertainty for industry and lack of confidence in recovered products.

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What measurable actions can you implement to progress each focus areas in the strategy?	WMRR has indicated below some general metrics that may be incorporated for each region. These metrics would show the progress of the state in transitioning to a circular economy and help government articulate the economic and environmental benefits and opportunities associated with increased resource recovery and reduction of waste. <i>Harness Economic Opportunity</i> • Measuring market demand for reused, manufactured, recovered and recycled materials and comparing it with demand for equivalent virgin materials. This will not only highlight economic value but will indicate if market uptake in the region needs further support. • Government procurement of locally recovered materials (this should be trackable through existing government systems). • Measuring volumes and economic value of recovered materials put on market. • Regional resource recovery rates. • Number of WARR facilities, by type. Ie: Landfill, EfW, Organics Processing, AD, Material Recovery Facilities (MRF) and local processing facilities including waste type (e.g. glass, solar panels, tyres). • Number of collection points for priority wastes, by waste type – this will articulate if a region has equitable access to appropriate infrastructure. • Economic value of WARR to the region (net profit and employment for operating facilities in the region). • Annual investment in recycling infrastructure for the region (both government and private). <i>Improve Access to Recycling and Encourage Behaviour Change - Measurable Actions:</i> • Reduction in kerbside volume per capita. • Recovery rates of recyclables and organics. • Regional and metropolitan metrics showing CRS collection points and number of containers collected. • Participation in household hazardous waste drop-offs. • Campaign recall for any behaviour change (i.e.: food waste avoidance) campaigns implemented to demonstrate effectiveness and campaign reach. • Increased share, repair, reuse metrics <u>Unleash innovation</u> • Number of new projects in development for each region and across State. • Trials undertaken for recovered products.

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	As noted above, regional data by waste type will help identify unique opportunities for the regions and help drive innovation • <u>Reduce the Cost of Living - Measurable Actions:</u> • Levy paid year on year per capita / volumes generated. • diversion of kerbside garden organics. • Reduction of household food waste. • Jobs created in WARR. <u>Reduce impacts of waste on the environment</u> • Lifecycle emissions performance: develop a metric to assess emissions across the material lifecycle (production, use, disposal. This metric would require analysis to show the volume of recovered material displacing the use of virgin materials in supply chains. • Reduced greenhouse gas emissions from avoiding landfill (hopefully showing a reduction year on year – this data could be sourced from landfill gas capture/ emissions reporting); • Update of recycled products and avoided virgin material emissions.
WASTE LEVY REVIEW	
Are the settings for the Queensland waste levy appropriate?	No, at present the levy rate in Queensland is too low and fails to reflect the true cost in recovering materials to compete with virgin products. There is a fundamental flaw in the waste levy being collected but not being directed proportionally back to solutions that incentivise circular outcomes. This is why it is essential that funding supports under the strategy are linked to the development of a strategic infrastructure plan and regional data identifying the unique challenges and opportunities for each of the regions. The current settings (Levy Zones, Levy Application and Annual Advance Payments) are misaligned with regional realities. Evidence led funding supports tied to strategic investment in infrastructure will ensure a more equitable and outcomes-based approach. The levy review should consider increasing levy to drive appropriate investment in the correct locations and apportioning levy funds to strategic infrastructure investment as set by the infrastructure plan derived from state-wide data analysis of specific regions.
How can Queensland reduce the impacts of waste levy settings in New South Wales on an interstate waste transfer?	<i>Align more closely with the NSW levy rate</i> The simplest way would be to match the NSW settings or at least move a lot closer to them. Currently there is a \$70+ differential between parts of Queensland and NSW, with Victoria and South Australia being more closely aligned to NSW in its current levy rates.

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Are there any wastes missing from the list of wastes that are excluded, exempt and discounted from the waste levy?	WMRR understands the initial objective of discounting waste to landfill by recyclers who meet efficiency thresholds to assist in making their recycled products cost competitive with virgin. It is vital in establishing and maintaining this approach that the system is audited and enforced in order that it does not simply become a way to avoid levy and therefore undermine broader recovery efforts.
What should waste levy funds be reinvested into?	WMRR would like to see waste levy funds focused on where the biggest impacts can be realised – this is something highlighted by our cover letter and calls for the strategy to be evidence- led so as to develop a needs analysis and State WARR Infrastructure Plan. Ideally, waste levy funding would be invested into the development of circular infrastructure solutions that displace the use of landfill. In line with the recommendation of QTC, WMRR supports the spending of levy funds to be transparent and reported on, and in keeping with the Waste Strategy Review Recommendation, it would be beneficial to link the funding allocated to the strategy itself via an online dashboard. Levy funds must be reinvested into specific regional specific actions (i.e.: capital infrastructure, transport assistance, organics behaviour change campaigns) that provide an affordable and sustainable pathway to achieving the diversion targets, and a comparable cost for recovery and diversion solutions between SEQ and Regional Queensland.
Are there any other administrative issues with the waste levy that need to be addressed?	The administrative issues with the waste levy have been brought to the Government’s attention in the <i>Local Government Red Tape Task Force Review</i>. WMRR has highlighted below the key comments that have been raised, primarily related to the duplication of data entry and the administrative penalties involved associated with the levy – these have already been articulated to the Queensland Government in previous reviews. <i>Zero Tolerance for Minor Data Entry Errors:</i> There is no threshold for allowable data entry errors by gatehouse operators at waste disposal facilities, meaning even immaterial mistakes are considered non-compliances. Councils have received non-compliances for minor issues such as incorrect vehicle registration numbers, even when camera imagery confirmed the details were correct but were not available in the Queensland Registration Check website. This rigid approach forces councils to employ additional staff or consultants to review every minor detail, adding unnecessary costs and administrative burden. <i>Inconsistent Application of Levy Exemptions:</i> The varying interpretation and application of exemptions, particularly for operational uses like clean earth, creates uncertainty for landfill operators. This inconsistency can discourage beneficial reuse practices, such as using clean earth for daily cover or site rehabilitation. Clearer, standardised guidance for compliance officers would help ensure uniform application across licensees.

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	<i>Duplicative and Inconsistent Data Reporting Requirements:</i> The current requirement to submit both Monthly Detailed Data (transactional level) and Summary Data Returns for all landfill sites in the Regional and Metro Levy Zone has created significant challenges. The scrutiny from the Department on these detailed data submissions is often inconsistent, varying between compliance officers and regions. Furthermore, compliance officers with an environmental protection background - rather than a data or audit specialisation - frequently struggle to fully comprehend the requirements. This results in a considerable drain on time and resources for Councils, especially when responding to low-risk inquiries. Smaller Councils, lacking dedicated staff, are forced to engage consultants for data auditing and compliance support, leading to substantial annual costs without corresponding benefits. <i>Repetitive Survey Requirements:</i> All levied landfill sites are currently required to conduct an annual volumetric survey of their sites, including resource recovery areas. However, this process is redundant as the Department of Environment, Tourism, Science and Innovation (DETSI) also conducts their own surveys. This duplication creates unnecessary administrative and financial burdens, particularly for smaller Councils. Integrating these reporting mechanisms would significantly reduce administrative overhead and cost. <i>Repetitive Reporting via QWDS and Annual Surveys:</i> Levied landfill sites are required to submit monthly QWDS reports, yet they are still obligated to complete the Annual Waste and Recycling Survey, which is an onerous and repetitive task. This duplication of reporting creates unnecessary administrative burdens for Councils. Integrating these reporting mechanisms would significantly reduce administrative overhead. <i>Disproportionate Grant Reporting Requirements:</i> The reporting burden for grant recipients is not scaled to the value of the grant. For example, a \$3,000 grant under the “Let’s Get it Sorted” program requires the same level of reporting as a \$240,000 grant. This is particularly problematic for Stream 2 (Litter and Illegal Dumping), where reporting is especially onerous. A tiered reporting framework based on grant size would be more appropriate and efficient. <i>OSOP and Agreed Way Methodology Reporting:</i> The annual waste levy reporting requirements, such as for on-site Operational Purpose (OSOP) exemptions or approved Agreed Way Methodologies, create duplicated effort. Detailed, transactional-level data is self-submitted each month, yet an additional annual report on OSOP data is still required. The interrogation of this data is often extensive and redundant, repeating efforts that were already carried out during the exemption application process. Specific OSOP audits also seem to duplicate efforts, often leading to the re-asking of queries that have already been addressed by other teams during the application. <i>Cumbersome Data Amendment Process:</i> Approvals from DETSI for changes and updates to self-reported monthly data under the waste levy framework are onerous, slow, and largely unnecessary. Significant delays in approving small and straightforward data updates have generated interest, leading to separate requests to waive the interest, which is often due to DETSI’s processing delays. Additionally, volumetric survey data currently lacks a formal or system-based ability to amend or correct data.

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	<i>High Cost and Low Value of Volumetric Surveys:</i> The annual waste volumetric survey is a costly and time-consuming process, taking weeks to arrange and costing councils upwards of \$25,000 per year. Despite the significant financial and resource investment, the survey often provides little added value to the waste management process, as much of the information is already captured through monthly returns. This creates unnecessary red tape and administrative burden for councils, especially when the data collected doesn't significantly enhance regulatory oversight or operational decision-making. <i>Redundant Summary Data Returns:</i> The reporting process via the Queensland Waste Data System (QWDS) involves duplication of effort. A detailed data submission, containing transactional information, is submitted each month, followed by a separate summary data return, which essentially replicates the same information in summary form. Since QWDS has the ability to compare the two submissions for accuracy, it seems redundant to require both. This duplication adds unnecessary administrative burden for councils and wastes valuable time and resources. <i>Separate Waste Levy and Strategy Reviews:</i> Following best practice, the Queensland Waste Levy Review and the Waste Strategy Review should have been carried out at the same time. If the Strategy is called "Less Landfill, More Recycling", then this necessarily dictates that the waste levy must work to this same goal and meaningfully make landfilling less attractive. The recovery rates for the state highlight that the current levy settings have enabled landfilling to be a preferred method of resource management, particularly in the regions. Waste levy is a key tool to help achieve the goals in the waste strategy. Reviewing them separately risks creating policies that don't work well together. The Queensland Government should consider synchronising future reviews of the Waste Strategy and Waste Levy and establishing a joint advisory panel to oversee both reviews.