Transforming Queensland's Recycling and Waste Industry Directions Paper

Consultation Report

Introduction

In June 2018 the Queensland Government released Transforming Queensland’s Recycling and Waste Industry Directions Paper for public consultation to inform the development of its new comprehensive waste strategy.

The new resource recovery, recycling and waste management strategy for Queensland will support the Government’s Advance Queensland agenda by promoting growth and jobs in the resource recovery and recycling industry. The strategy will provide the waste and resource recovery sector with the policy certainty required to attract significant investment for new and expanded resource recovery infrastructure in Queensland.

The waste levy—the centrepiece of the strategy—will be instrumental in changing waste management behaviour and practices in Queensland. The levy will increase the incentive for generators of waste to reduce the amount of waste disposed of to landfill.

Instead, waste material will be valued as a potential source of feedstock for the state's biofutures industries, which increases the commercial viability for the creation of new industries that manufacture products using recycled content.

The levy rate for disposal of general waste, (construction and demolition (C&D), commercial and industrial (C&I) and municipal solid waste (MSW)) will commence at $70 per tonne and increase $5 per year for 4 years. The cost of the levy for regulated waste will commence at $150 for Category 1, and $100 for Category 2.

A crucial consideration in designing the levy will be the inclusion of measures that avoid direct cost impacts to households as a result of the levy.

The funding generated through the levy will be used to deliver programs to support local government, business and industry in reducing the amount of waste they generate and increase recycling. Funding support will also be made available for the development of new markets and products. A portion of the funds raised through the levy will also be put towards programs to enhance the natural environment that all Queenslanders enjoy.

Participation and response

This report summaries the 100 written submissions on the Directions Paper.

Submissions were categorised against sectors. Table 1 identifies the number of submissions received from each sector. Appendix 1 lists all respondents.

Table 1 - Stakeholder sector and submission number

<table>
<thead>
<tr>
<th>Stakeholder - Sector</th>
<th>No. of submissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industry - Waste</td>
<td>15</td>
</tr>
<tr>
<td>Industry - Peak Body</td>
<td>22</td>
</tr>
<tr>
<td>Industry - Other</td>
<td>9</td>
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<tr>
<td>Industry - Consulting</td>
<td>5</td>
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<tr>
<td>Environment &amp; Community Peak NGPs and NFPs</td>
<td>9</td>
</tr>
<tr>
<td>Local Government</td>
<td>25</td>
</tr>
<tr>
<td>Local Government - Peak Body</td>
<td>4</td>
</tr>
<tr>
<td>Individual</td>
<td>7</td>
</tr>
<tr>
<td>Academic Institution</td>
<td>1</td>
</tr>
<tr>
<td>Unknown / Other</td>
<td>3</td>
</tr>
</tbody>
</table>

Consultation process

The Directions Paper was released on 1 June 2018 for a period of 29 days. Consultation closed on 29 June 2018.

The release of the Directions Paper was promoted through the Recycling and Waste Management Stakeholder Advisory Group, the DES website and via a media release.

Key issues raised
The following issues were raised across multiple submissions:

- Levy commencement date;
- Levy rate;
- Impact on households;
- Determination of a levy zone;
- Potential or required exemptions;
- Recycling and concessional rate for residual waste from genuine recycling processes;
- Waste collection process;
- The use of levy revenue for funding of programs;
- The development of a comprehensive new Waste Strategy;
- The adoption of the principles of the waste hierarchy and a transition towards a more circular economy;
- Support for continued leadership in developing product stewardship;
- The role of waste-to-energy; and
- Support for stronger leadership from the Commonwealth Government.

**Waste disposal levy**

The following summarises feedback received regarding the waste disposal levy.

**A waste disposal levy will come into effect in the first quarter of 2019**

While there was general support for the introduction of a waste disposal levy, the majority of submissions called for a commencement date in the third quarter of 2019. The primary reason provided was to provide sufficient time to prepare for the levy and to align with the 2019-20 financial year.

**The levy will apply to all major waste streams**

Submissions that supported the introduction of a levy recommended it should apply to all the main waste streams, with exemptions for specific wastes such as recycling residuals.

**The levy rate will commence at $70 per tonne for all general waste streams, with higher rates for regulated waste, and increase by $5 per year**

The proposal for a levy set at $70 per tonne with incremental increases was generally supported. Concerns were raised that the proposed annual levy rate increment was considered to be disproportionate to Consumer Price Index (CPI).

Submissions requested that annual increases of the levy take place at the beginning of each financial year, rather than at the beginning of the calendar year or on the anniversary of the levy implementation date.

Increases that align with the financial year were seen as more cost effective as they can be considered alongside other annual changes.

The high cost of the levy was seen as having the potential to increase illegal dumping, and the potential for (insolvency) bad debts was raised. Submitters requested that adequate resources be made available to reduce opportunities for levy avoidance.

Submitters also questioned the accuracy of revenue forecasts, particularly how the levy will change in 4 years time and the impacts of proposed higher rates on the business community.

**The levy will have no direct impact on households**

A number of submissions were concerned that the levy would result in an additional cost for new home buyers or households undertaking significant renovations. Conversely, almost the same number of submissions suggested the levy impact on households was overstated.

There was a suggestion for a rebate scheme to allow new home buyers to claim back the additional cost created by the levy. Another submission suggested that many tradespeople are unaware of the actual impact the levy will have on their quotes.

Feedback from local government sought a legislative commitment from the State Government on the definition of household MSW and recommended the definition should include all local government related waste streams that result in cost impacts on households.

Local government also sought a legislative commitment from the State Government on how the annual advance will be calculated to ensure the impacts will not be transferred to households in the future.

One submitter requested the modelling (or other assessment) of economic impacts be made publicly available, or further works be undertaken to better inform the strategy before pursuing legislative change.

Concerns were expressed there would be potential for some local councils to "double dip" and still charge households for dumping waste.
As avoidable waste disposed of to landfill declines, the revenue generated from the waste levy will also decline. There was concern that this will impact on households in coming years, for example, when the 105% rebate becomes insufficient to cover costs of levy administration.

A small number opposed the proposed rebate of 105% on municipal solid waste. It was suggested that this would remove the incentive for councils to reduce waste and there were also calls for the levy to apply to the whole community and not just businesses.

The levy will apply to a levy zone that covers the populated areas of Queensland

A number of submissions question the demarcation of the levy zone, particularly why 39 areas, out of a total 77 local government areas were excluded. Some submitters suggested the levy should apply to all areas of Queensland.

Submitters expressed concerns that ‘legal loop holes’ may still exist where excluded areas, on the periphery of the levy zone, may attract waste from inside the levy zone, as well as interstate waste, which could be claimed as being ‘recycled’, thus avoiding the levy. Particular concerns were expressed for areas which had a number of unmanned facilities, raising the suggestion that these areas should not be included in the levy zone.

The decision to have areas where the levy was exempted was on occasion not supported by stakeholders with concerns raised that these could become dumping grounds.

Clear exemptions to the levy will be identified

The proposed exemptions were generally supported, but greater clarification was requested, particularly for materials such as acid sulphate soils.

Some councillors opposed the levy being applied to MSW and requested that waste generated by a council’s own activities also be exempt.

A number of submissions suggested that wastes such as landfill day cover or other materials used on landfill sites be exempt. A discount or an exemption from the levy in regional areas, until such time as there is infrastructure in place for collecting, sorting and recycling waste, was also proposed.

Residual waste resulting from legitimate recycling activities will have a concessional levy rate.

The proposal for concessional levy rates for residual waste resulting from legitimate recycling activities, such as material recovery facilities (MRFs) was widely supported, some submissions went further and called for these wastes to be exempt as this would support innovation and industry development.

Operators of waste disposal facilities will collect the levy

A number of submissions expressed concerns about landfill operators being responsible for debt recovery (from the generator or transporter) and/or liable for levy payments for deliveries for which they have not paid due to customer bad debts. Concerns were raised regarding the costs of implementing the levy on smaller and remote landfills, particularly those with limited resources that do not have a weighbridge.

There was a call for greater government support to allow for the volumetric calculation of waste and the development of a common waste data system.

The levy will have a firm legislative base

Submissions stated that there needs to be bipartisan agreement to the levy so that businesses had certainty to invest in the sector.

A submitter stated that legislation should clearly define the waste and waste management activities that are subject to, or exempt from application of the levy.

It was submitted that legislative amendments should not capture wastes or waste management activities that are not intended to be captured. In particular, wastes not subject to commercial disposal and disposal of wastes associated with an Environmentally Relevant Activity (ERA), as planning and approvals processes cover these. Further consultation was requested, ahead of pursuing legislative change.

The risk-based approach for regulated waste in the Review of the Regulated Waste Classification and Waste-Related Environmentally Relevant Activity Frameworks – Consultation Regulatory Impact Statement, was commended, however comments were made stating the regulations should be amended prior to commencement of levy.

Levy proceeds will go to waste, environmental and community

Submissions strongly supported all funds from the levy being used for strategic resource recovery and waste infrastructure across all Queensland. There was equally strong opposition to levy funds being allocated to general revenue, particularly for programs that are not specific to resource recovery.
and waste. A number of local government submissions supported the return of all waste levy revenue back to councils.

A number of submissions sought the development of an agreed strategic investment framework. Other submissions supported use of revenue from the levy for grants and funding programs to assist the resource recovery sector and the allocation of levy revenue to those communities outside the levy area (including remote local government and indigenous communities).

Feedback suggested that the calculation methodology for the 105% rebate should be clarified. The waste industry and business sectors did not support the disproportionate allocation of levy funds to local government infrastructure which is in direct competition with private sector waste management facilities.

Program funding

A number of submissions sought a commitment that the State Government would investigate the introduction of regional transport subsidies to offset the costs incurred by regional councils in accessing markets for recycled commodities. Some submissions requested a percentage of the levy be dedicated to the administration, regulation and enforcement of the levy.

New Waste Strategy

The following sections summarise key consultation feedback on the new waste strategy.

The new strategy

Submissions supported and generally agreed with the broad objectives and the strategic intent of the proposed new waste strategy. There was support for the zero waste to landfill strategy. There were a number of submissions for the removal of the term avoidable waste and also other requests for a clarification of avoidable waste.

Several submissions suggested a zero waste strategy was more appropriate and the proposed goal should be more ambitious by setting a shorter timeframe such as 2030.

There was agreement that the strategy should create a platform for improving the segregation of waste at the household level. Submissions also recommended the diversion of organic waste from landfills should be a key focus.

A number of submitters called for proactive procurement by Government agencies of recycled content products. This includes consideration of government product specifications (stipulating minimum recycled content) and a preference towards having provisions and standards within their own procurement policies.

Several submissions suggested that State Government should work with other jurisdictions to harmonise state laws and regulations and local by-laws. Additionally, waste infrastructure should be viewed as an essential service by Government, with waste precincts being identified in a state planning instrument.

Submitters recommended state government look at the development of technical specifications and engineering standards. Some submitters went further, suggesting the use of resource recovered materials, such as crushed glass in road base and other government civil works, be mandated.

A number of submissions referred to the potential for conflict of interest, where the private sector was offering waste facilities and services in a local government area, in direct competition to existing Council waste facilities and services, with Council having jurisdiction for making approval decisions.

Queensland will progressively move toward a ‘circular economy’ to realise resource recovery opportunities and grow recycling sector investment and jobs

A number support the proposal for Queensland to progressively move toward a circular economy, particularly to realise resource recovery opportunities and grow recycling sector investment and jobs. However, the Queensland Government’s procurement practices were seen to need to change, to support the circular economy.

One submission suggested the introduction of a new waste management strategy needs to include the continual review of new and innovative technologies to improve the circular economy opportunities in all types of waste management.

Another submission suggested the objectives of a holistic circular economy approach to resource management, should include clear obligations upon manufacturers, importers, distributors and other persons in relation to the mechanism by which waste:

• is to be avoided or eliminated from the utilisation of their products;
• is to be harnessed as a resource for reuse and or recycling; and
• impacts on the environment are to be minimised or how the overall greenhouse inventory (product
creation, use, recycling, treatment, disposal, etc.) of products is to be minimised.

Important prerequisites for a circular economy include identification and/or establishment of processes and infrastructure to enable the materials and components to be reused and/or recycled and the establishment and support for consumer markets for reused and recycled materials and components.

Performance targets
Waste performance targets were supported, however a zero waste to landfill target by 2050 was not supported by LGAQ, who advocated for 2028.

Feedback was provided to indicate that targets to reduce waste to landfill is not thought to be the best metric to achieve a circular economy outcome. It was commented that there is a difference between a circular economy or zero waste model and a zero waste to landfill model.

It was commented that a national approach is required to waste diversion targets and measuring systems. The current situation where each state sets its own waste reduction targets is counterproductive.

Queensland will pursue landfill disposal bans on selected waste streams where proven feasible
There was strong support for Queensland to introduce selective disposal bans, where potential markets exist where there is sufficient transition time for infrastructure to be put in place before commencement of the bans. Submissions requested landfill bans are supported by consultation and involve a realistic time frame for implementation. Landfill bans are needed for market development. It was also suggested that applying a landfill disposal ban uniformly across the entire state may lead to adverse consequences, and consideration be given to concentrating bans on metropolitan landfills.

It was suggested that the government should consider a landfill ban of all traditionally recovered material; such as, concrete, bricks, steel, non-ferrous material, timber, cardboard, clean fill, unsuitable fill, grassy fill and green waste.

In addition, it was submitted that all mixed waste should be sent to transfer stations for resource recovery, and only residual and contaminated waste should be sent direct to landfill.

One submitter suggested that landfill bans on food organics should not be to the detriment of existing business models such as landfill gas utilisation projects. Further information was also requested on proposals to implement a disposal ban on green waste.

Landfill disposal bans on e-waste and tyres were also supported. One submission highlighted a need for regulations to limit the stockpiling of banned materials.

Queensland will adopt product stewardships schemes where national action fails and community demand is evident
Submissions were supportive of both state based and national product stewardship schemes.

There was support for the Queensland Government continuing its leadership in product stewardship initiatives and moves to help reduce inbuilt product redundancy in appliances and electoral goods. Submissions called for the development of national product stewardship schemes, as many products are sold in national markets and are problematic in all jurisdictions. There was also support for the adoption by Queensland, of product stewardships (mandatory) schemes where national action fails and community demand is evident.

It was suggested that the strategy could expand Queensland’s involvement in the manufacturing side of packaging and work on waste management from the beginning of the cycle of waste.

It was recommend that pro-active industries, with existing product stewardship agreements outside the Commonwealth Product Stewardship Act 2011, should be allowed to remain outside any legislated voluntary framework.

The Queensland Government will explore the development of waste-to-energy
There was strong support for the Queensland Government developing a waste to energy plan/strategy as part of the waste management system. However, efforts to reduce, reuse and recycle waste should be prioritised above energy recovery and landfilling.

Waste-to-energy was suggested by some commentators as essential in order to ensure the full potential of a circular economy, however this was contradicted by other submitters who suggested it had no role to play.

Submissions informed that waste to energy plants of commercial scale are likely to require a certainty of feedstock of waste to justify the significant investment in building the plant. It was flagged that long-term contracts to facilitate this certainty may undermine genuine reduction/recycling programs.
A number of submissions highlighted the potential impacts of waste to energy that need to be considered. They were concerned that waste to energy (incineration) is an inefficient energy source, generates toxic and greenhouse gas emissions (equivalent to burning coal), produces a toxic residue (ash) requiring specialised management and is generally unpopular with the public (not in my backyard (NIMBY)).

It was commented that the Queensland Government should take the time to understand what other jurisdictions have implemented (e.g. New South Wales, South Australia and the United Kingdom) and what has worked well or not in these areas.

**The Queensland Government will continue to engage nationally on interjurisdictional waste issues and take a lead national role where necessary**

There was support for a move to national consistency in waste management and to encourage the Australian Government to play a more active leadership role in waste.

**Queensland will develop a best practice performance monitoring system underpinned by a comprehensive waste database**

There was strong support for the proposed comprehensive waste database.

One submission sought that live data reports to be user-generated by a web-based Queensland Waste Data System. It was recommended that the system be publically accessible to any community member or business and be user-friendly.

**Other comments**

There was strong support for the policies proposed in the directions paper.

Waste Management Association of Australia (WMAA) suggested the Directions Paper reference the waste management hierarchy; managing waste as close as possible to the place of generation; and producer responsibility and extended stewardship.

A number of submissions would like to see a regional equalisation scheme to balance costs out across the state, whilst local processing and markets are being established. An equalisation scheme for transport will be essential to enable regional aggregation of wastes for any regional infrastructure investment.


Few comments were received specific to Appendix A, although it is noted that targeted consultation was undertaken in 2017 with regard to the existing strategy. The below summarises the feedback on the draft Review Report.

There was support for legislative reform to enable beneficial use of regulated waste (reform the regulated waste list under Schedule 7 of the Environmental Protection Regulation 2008) and support for restructure of ERA 53 - Organic Materials Processing, to exclude on-farm composting activities.

A number of comments submitted for the Directions Paper also made reference to previous waste strategies

Reference was made to the Queensland Waste Reduction and Recycling Strategy (2010 – 2020) and its failure to achieve the government’s vision of a low-waste Queensland, as a result of poor implementation and lack of clarity.

Several submissions also referred to this older strategy which was released by the Newman government. The submissions quoted the 2017 review which revealed that (in the period 2013 – 16):

- Per capita generation of waste increased by 4.4%
- State-wide domestic waste recycling rate decreased
- Business waste recycling improved to 47%
- Construction waste recycling decreased by 18.5% and
- Waste to landfill increased by 9.6%

The submissions reiterated the review’s conclusion that the Queensland waste reduction targets for municipal, C&I and C&D sectors for 2024 will not be met.

Other submission stated the 2017 review of the existing strategy clearly shows that Queensland was not achieving sufficient improvements in waste management to meet the designated targets. The reason for this failure was that the strategy had a voluntary approach, which hindered its full realisation due to a lack of a coordinated program of work and market-based mechanisms to incentivise behavioural change.

One submissions noted that the WARP Strategy included the potential for the state government to introduce measures to ban tyres from going to landfill and/or to limit and regulate stockpiling of such material. However, the potential was not realised.
<table>
<thead>
<tr>
<th>Key issue raised</th>
<th>Queensland Government Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concerns were raised regarding the commencement date of in the first quarter of 2019.</td>
<td>The commencement date was brought forward to the first quarter of 2019 in response to industry and local government concerns regarding kerbside recycling in light of the China Sword issue.</td>
</tr>
<tr>
<td>Concerns were raised that the levy rate was too high, in particular in regional Queensland.</td>
<td>Queensland’s proposed levy rate is within a similar range as those applied to general waste in other mainland states. In particular, it is proposed to be less than the regional waste levy rate in New South Wales. A reduced levy rate in regional areas would encourage transport of waste from Southeast Queensland and possibly interstate into adjacent rural and regional areas which may not have suitable landfill capacity. Projects funded by the levy will have rural and regional benefits. Levy funds will be available to assist councils in rural and regional areas with waste disposal infrastructure upgrades and recycling and resource recovery efforts.</td>
</tr>
<tr>
<td>Concerns were raised that the levy would have a direct impact on households increasing the cost of living.</td>
<td>Local governments will receive an annual payment to address the levy costs associated with municipal solid waste. The annual payments must be used by local governments to mitigate any direct impacts of the levy on households in the local government area.</td>
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<tr>
<td>Local government sought a legislative commitment from the State Government on how the annual advance will be calculated.</td>
<td>The Waste Reduction and Recycling (Waste Levy) and Other Legislation Amendment Bill 2018 provides a head of power for the annual payments and for the calculation method to be prescribed by regulation.</td>
</tr>
<tr>
<td>Concerns were expressed there would be potential for some local councils to &quot;double dip&quot; and still charge households for dumping waste.</td>
<td>The Waste Reduction and Recycling (Waste Levy) and Other Legislation Amendment Bill 2018 provides that the chief executive must refuse to make a further annual payment until the local government uses the annual payment to mitigate any direct impacts of the levy on households in the local government area.</td>
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<tr>
<td>Concerns were raised regarding the determination of the levy zone, with specific references made to certain areas being in or out of the levy zone.</td>
<td>The levy zone boundaries were based on local government areas with a population of more than 10,000 people. The boundaries are the same as last time a waste levy was established in Queensland in 2011, with the exclusion of Goondiwindi and inclusion of Maranoa Regional Council.</td>
</tr>
<tr>
<td>Concerns were raised regarding the role of bad debts in delivering the outcomes of the levy.</td>
<td>Landfill operators will be able to apply to be re-credited for the levy they paid on waste delivered by a customer who goes insolvent within 12 months without paying the levy cost that was passed on to them.</td>
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| A number of issues were raised with regard to concessional rates being applied for residual waste | In order to generate jobs and economic growth, a 50% discount on the levy will be available, on application, to }
<table>
<thead>
<tr>
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<tr>
<td>from genuine recycling processes.</td>
<td>attract downstream recycling facilities (e.g. of metal, plastics and paper). Levy exemptions will be available, on application and only for limited periods, to assist the levy transition for existing recovery and recycling entities, including those affected by China’s decision earlier this year to tighten import quality standards for recycled materials under its ‘National Sword’ policy.</td>
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<tr>
<td>Stakeholders expressed the view that most, if not all, of the levy revenue should be returned to the funding of programs to improve waste and resource recovery outcomes in Queensland.</td>
<td>The 2018-19 State Budget provides for 70% of revenue generated through the levy to be allocated to advance payments to councils, scheme start-up and operational costs, industry programs and other environmental priorities. Surplus revenue from the levy will benefit the entire Queensland community by providing funding for schools, hospitals, transport infrastructure and frontline services.</td>
</tr>
<tr>
<td>Stakeholders generally supported the development of a comprehensive new waste strategy for Queensland.</td>
<td>The Queensland Government is developing a comprehensive new waste strategy to provide a whole of government response. The aim of the strategy will be to recognise the economic opportunity presented by the Queensland waste industry through the delivery of increased recycling and resource recovery.</td>
</tr>
<tr>
<td>Stakeholders supported the adoption of the principles of the waste hierarchy and a transition towards a more circular economy.</td>
<td>The new Waste Management and Resource Recovery Strategy will be founded on the principles of the waste hierarchy, and will adopt the principles of the circular economy as they relate to waste avoidance, reuse, remanufacturing, recycling, and energy recovery.</td>
</tr>
<tr>
<td>There was general support for the Queensland Government to transition towards a more circular economy.</td>
<td>The Queensland Government will consider the role that the circular economy may have in the future for Queensland. The new Waste Management and Resource Recovery Strategy will adopt circular economy principles.</td>
</tr>
<tr>
<td>Both concern and support were raised when submissions discussed the role that waste to energy may play in delivery of the strategy.</td>
<td>The Queensland Government will develop a policy on the role that waste to energy may have in managing residual wastes where landfill is the only other suitable alternative. The policy will highlight where energy recovery is an appropriate solution under the waste hierarchy.</td>
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<tr>
<td>A number of submissions demanded that the Commonwealth Government show stronger leadership.</td>
<td>The Queensland Government will continue to work with the Commonwealth Government and other jurisdictions to find national solutions where practicable.</td>
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</tbody>
</table>
Appendix 1 - List of written submitters

Academic Institutions
Institute of Future Environments (IFE), Queensland University of Technology

Environmental/ community Peak + NGPs & NFPs
Boomerang Alliance
Environmental Defenders Office
Gecko Environment Council Assoc. Inc
GIVIT
Queensland Conservation Council
Redlands 2030
Sunshine Coast Environmental Council (SCEC)
Wide Bay Burnett Environment Council
Wildlife Protection Society of Queensland

Individuals
Debra Bambrook
Gary Duffy
Ray Ison
Georgia Liussi
Mic & Lynette
K. O’Brien & Craig Myers (Zero Waste Ipswich)
Rowan Rafferty

Industry - Consulting
GCS Consulting
Full Circle Advisory
GHD
Mike Haywood
MRA Consulting Group

Industry - Others
All Energy Pty Ltd
Baxter Healthcare
BMI Group
Caltex (Private and Confidential)
HQPlantations
Kal Tire
Lantrak
Rio Tinto
Pacific National (Confidential information)

**Industry - Peak Body**
Australian Council of Recycling (ACOR)
Australian Industrial Ecology Network (AIEN)
Australian Landfill Owners Association (ALOA)
Australian Sustainable Business Group
Australian Tyre Recyclers Association
Bioenergy Australia
Commerce and Industry Queensland (CCIQ)
Consult Australia
Demolition Industry Association
Green Building Council Australia
Housing Industry Association
Master Builders Queensland
National Waste and Recycling Industry Council
News Media Works
Property Council of Australia
Queensland Farmers Federation
Queensland Resources Council
Queensland Tourism Industry Council
Timber Queensland
Tyre Stewardship Australia
Waste Management Association of Australia (WMAA)
Waste Recycling Industry Association

**Industry Waste**
Aerochamber Pty Ltd
Byrne Resources Group
Bio-waste Solutions
Cleanaway
Handy in Waste Services & Skip Bins Brisbane Group
Hitachi Zosen Inova Australia
J.J. Richards & Sons Pty Ltd
Lemura Sand Co Pty Ltd (submission prepared by RPS Group)
Licella
Orora
Soil Cyclers
Tellus
SUEZ
Veolia
Visy

Local Government
Banana Shire Council
Brisbane City Council
Bundaberg Regional Council
Burdekin Shire Council
Cairns Regional Council
Charters Towers Regional Council
City of Gold Coast
Douglas Shire Council
Goondiwindi Regional Council
Hinchinbrook Shire Council
Ipswich City Council
Logan City Council
Mackay Regional Council
Mareeba Shire Council
Moreton Bay Regional Council
Noosa Council
North Burnett Regional Council
Redland City Council
Rockhampton Regional Council
Tablelands Regional Council
Toowoomba Regional Council
Townsville City Council
South Burnett Regional Council
Sunshine Coast Council
Western Downs Regional Council

Local Government Peak Body
FNQ Regional Organisation of Councils
Frazer Coast Regional Council
Local Government Association of Queensland
SEQ Council of Mayors
Other
Carina-Carindale Branch of the ALP
HWL Ebsworth acting for Mega Estate Pty Ltd
One submission of unknown origin