

Directions Paper  
Strategic Environment and Waste Policy  
Department of Environment and Science  
GPO Box 2454  
BRISBANE QLD 4001

Email: [wastepolicy@des.qld.gov.au](mailto:wastepolicy@des.qld.gov.au)

2 August 2018

Dear Sir/Madam,

**RE: TRANSFORMING QUEENSLAND'S RECYCLING AND WASTE INDUSTRY  
DIRECTIONS PAPER**

The Green Building Council of Australia (GBCA) commends the Queensland Government on developing a strategy for resource recovery, recycling and waste management and also for enabling industry input through the Directions Paper. We acknowledge that waste is a complex subject with impacts on many areas of business, industry and the community and that there are no simple solutions to many of the challenges raised in the Paper.

The Queensland Government is in a unique position to improve waste management practices using new and innovative technologies and approaches, in addition to supporting domestic and local processing and market development. However, we note that among the stakeholders which have been selected for the Recycling and Waste Management Stakeholder Advisory Group (the Advisory Group), there is an under-representation of groups that demonstrate expertise in sustainable development and innovation. We therefore encourage the Queensland Government to seek the involvement of groups such as the Green Building Council of Australia or the Infrastructure Sustainability Council, which have expertise in sustainable building guidelines such as the SURF ANZ "Framework for Assessing the Sustainability of Soil and Groundwater Remediation" and ISO 18504:2017 Soil quality - Sustainable remediation.

Additionally, we consider that the Terms of Reference for the Advisory Group could include the following considerations:

- Relevant policies and regulatory approaches developed in other jurisdictions;
- Recent academic data and research on waste impact and opportunities;

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**Phone:** +61 2 8239 6200

**Fax:** +61 2 8252 8223

**Email:** [info@gbca.org.au](mailto:info@gbca.org.au)

**ABN:** 43 100 789 937

**Address:** Level 31 / 200 Barangaroo Avenue, Barangaroo, NSW 2000

**Website:** [gbca.org.au](http://gbca.org.au)

- Input from local governments, noting that most local governments operate municipal waste services and would provide valuable insights based on their experiences.

## Green Star and Waste Minimisation

Green Star currently addresses waste minimisation in buildings through the credits for Operational Waste, Construction and Demolition Waste and Waste Management, which incentivise industry to design, build and operate in ways that promote best practice waste management. On average, Green Star certified buildings recycle 54% more of their construction and demolition waste than standard practice<sup>1</sup>.

In April 2012, the GBCA invited waste contractors, resource recovery facility operators, waste policy and regulatory specialists, waste auditors and Green Star Accredited Professionals experienced in applying Green Star's Waste Management credit, to participate in the Green Star Construction and Waste Reference Group (CDWRG). The CDWRG was responsible for providing expert advice and contributed to the development of a discussion paper titled *Construction and Demolition Waste Management in Green Star*, which sought wider industry feedback on the development of the Green Star Construction and Demolition Waste credit<sup>2</sup>.

Green Star's Construction and Demolition Waste credit rewards management practices which minimise the amount of construction and demolition waste from base buildings and/or interior fitouts that is disposed to landfill. In order to claim this credit, the project proponent is required to use waste contractors and waste processing facilities that have been independently verified to comply with minimum standards of reporting. The use of these standards and checks ensures that contractors and facilities operate with environmentally responsible due diligence on behalf of Green Star projects.

Waste contractors and waste processing facilities providing services to projects seeking Green Star certification must comply with the current version of the Green Star 'Construction and Demolition Waste Reporting Criteria'. This Reporting Criteria was developed to address reporting accuracy claims and recognise best practice standards. Over the coming months, as the GBCA embarks on the process of developing the next version of the Green Star rating tools, this Reporting Criteria as well as other Green Star requirements for waste management will be reviewed. As part of this process, we will be undertaking extensive consultation to seek industry and government input on these standards. We expect feedback received from waste contractors and waste facilities will be incorporated, ranging from their experience in demonstrating compliance to insights regarding recent advances in the waste industry.

## Feedback on the Directions Paper

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<sup>1</sup> Green Building Council of Australia, *The Value of Green Star – A Decade of Environmental Benefits*, 2013. Accessed August 2018 from: [https://www.gbca.org.au/uploads/194/34754/The\\_Value\\_of\\_Green\\_Star\\_A\\_Decade\\_of\\_Environmental\\_Benefits.pdf](https://www.gbca.org.au/uploads/194/34754/The_Value_of_Green_Star_A_Decade_of_Environmental_Benefits.pdf). Today, given there is just over 28 million square meters of building stock in Australia with a Green Star Design or As Built rating, the estimated reduction in waste to landfill is 3.2 million tonnes.

<sup>2</sup> The CDWRG included 46 organisations, including 24 GBCA member companies. It provided feedback on the draft discussion paper ahead of its public release in 2013. Effort was taken by the GBCA to involve participants from all Australian states and territories. More information and a list of the CDWRG representatives can be found on the GBCA's website at <https://new.gbca.org.au/construction-and-demolition-waste>

The GBCA seeks further clarity from the Department on the exemption to the levy for waste where disposal is required by regulation, such as asbestos. Asbestos containing material (ACM) may only contain a small percentage of asbestos, but these materials must not be recycled. ACMs are levy exempt in NSW to encourage correct disposal practice and disincentivise illegal dumping as a result of high costs.

Given the potential for illegal disposal, we urge the Government to consider ways to provide support for site owners to reduce and manage this problem. Local governments as well as regulators should be mobilised and provided resourcing support to tighten surveillance on illegal dumping. We support hypothecating part of the waste levy for this purpose.

We note that the Directions Paper does not address verification of reported data. Verification of accuracy in waste measurement and reporting is important given industry concerns with current reporting methodology by some waste contractors. For example, the reporting mass of waste in every waste stream is generally based on volumetric estimates. Contractors will typically process the weight of incoming bins at their weighing bridge, dumping the waste in the transfer facility then make a visual estimate of the volume of each waste stream in the waste load, and convert this percentage back to mass. Where a bin was 50% plastic and 50% concrete, the mass could be reported back as an equal tonnage for plastic and concrete. This represents inaccurate measurement and highlights anomalies in reporting practices.

Finally, growth in population and industries will mean more waste generation in the coming decades which means that waste recovery or recycling facilities will be expected to come under pressure. The strategy should address how the state seeks to support sufficient waste recycling in regions of economic activity. This requires a greater integration of land use planning system and waste and resource recovery planning processes. To ensure that waste is managed in a sustainable manner as the state grows, the planning system should be leveraged to create certainty for industry, which enables long term investment, innovation and planning.

The GBCA looks forward to engaging with the Department further on the development of this strategic policy for Queensland's recycling and waste industry. Should you have questions on the items raised in this submission, please contact Sandra Qian, Senior Policy Advisor at [sandra.qian@gbca.org.au](mailto:sandra.qian@gbca.org.au).

Yours Sincerely



Romilly Madew  
Chief Executive Officer