

QFF MEMBERS

Australian Prawn
Farmers Association

CANEGROWERS

Cotton Australia

Emerging Primary
Industries Group

- Australian Ginger Growers
- Biological Farmers of Australia
- Flower Association of Queensland Inc
- Queensland Aquaculture Industries Federation
- Qld Olive Associations Group

Growcom

Nursery & Garden
Industry Queensland

Qld Chicken Growers
Association

Qld Dairyfarmers'
Organisation

Qld Irrigators Council
Association Inc

Australian Chicken
Meat Council

20 December 2007

Mr Terry Wall
Director General
Environmental Protection Agency
PO Box 15155
City East Q 4002

Dear Mr Wall,

Queensland Waste Strategy Discussion Paper Submission

Please find attached a submission from QFF in response to the EPA's discussion paper on the Queensland Waste Strategy. QFF appreciated the detailed briefing provided by the Agency on 15 November and the opportunity to respond to this paper.

Yours sincerely,



John Cherry
Chief Executive Officer

QUEENSLAND WASTE STRATEGY DISCUSSION PAPER

QUEENSLAND FARMERS' FEDERATION SUBMISSION

Queensland Farmers' Federation (QFF) is the peak farming industry organisation in Queensland, uniting 13 of the State's peak primary industry organisations, who collectively represent more than 13,000 primary producers across the State. QFF is a federation of the major intensive primary production organisations working on behalf of all primary producers and rural communities. Agriculture contributes around \$11 billion a year to the State's economy, and employs over 75,000 people mostly in regional areas.

Through QFF, primary industry resources are pooled to ensure powerful representation and effective strategy development on important industry issues. QFF provides direction, leadership and representation on issues of common interest to the farming sector in Queensland. Our goal is to secure a sustainable and profitable future for our members, as a core and dynamic element of the economy.

QFF Member bodies include:

Australian Prawn Farmers Association

CANEGROWERS

Cotton Australia

Growcom

Nursery & Garden Industry Queensland

Qld Chicken Growers Association

Qld Dairyfarmers' Organisation

Qld Irrigators Council Association Inc

Flower Association of Queensland Inc

Qld Chicken Meat Council

Emerging Primary Industries Group

- Australian Ginger Growers
- Biological Farmers of Australia
- Queensland Aquaculture Industries Federation

General approach to waste:

QFF and its members recognise that waste management is one of the key risks that need to be managed in the running of a successful farm business. QFF and its members have been actively involved in the development of Farm Management Systems industry programs, which are a risk based decision making approach to managing farms more sustainably and

profitably. Each QFF member organisation has been actively involved in the development of industry FMS programs to meet the specific needs of their industry. QFF has also signed a Memorandum of Understanding with the Queensland Government (March 2005) in which the State recognised the QFF FMS Framework and agreed to work for more effective recognition of the programs.

Waste management is a key component of many QFF industry programs. The following examples highlight this:

- **Nursery Production industry:** EcoHort Environmental Management System contains a chapter on managing waste, including the development of Waste Management Plans. EcoHort includes a training, planning, accreditation and auditing process for participants. The objectives of its waste chapter are:

“The options for managing waste are to reduce, recycle and donate waste. The first step is to identify all types of waste in your business, then develop a waste management plan for these items, using the four strategies where appropriate to minimise the amount of waste going to landfill.”¹

drumMUSTER == very successful (p.19) -259,748 containers across Qld in 2005
ChemClear – also some levies, but struggles with funding - 22,600 litres collected

- **Dairy Industry:** Queensland Dairyfarmers’ Organisation is rolling out a Dairying Better’n’Better program developed by Dairy Australia which aims to reduce environmental risks on dairy farms. A key part of the program is the DairySAT self assessment tool. The nine chapters of DairySAT include a chapter on Effluent Management and one on Farm Wastes. DairySAT aims to help the farmer develop a farm Action Plan based on the identification of ‘unacceptable practices’, ‘acceptable industry practices’ and ‘above acceptable industry practices (best practice)’. The Waste chapter identifies practices for General Rubbish/Waste, Waste Milk, Dead Stock, Odour and Noise and Silage Wrap/Covers. The manual advises farmers:

“Many years ago, farmers had few, if any options for farm waste disposal, which meant that they filled depressions, washaways and gullies with their farm waste. Now with recycling options, landfills and creative reuse ideas for waste, farmers are able to treat farm waste differently. If not properly managed, farm wastes, noise and odour can cause issues with the general community and neighbours. This is because it is easy to recognise these issues (e.g. you can see rubbish blowing around). Environmentally, the other key problem is the pollution of both ground and surface waters.”²

- **Cotton Industry:** The Cotton industry has a highly developed Best Management Practices program that aim to reduce the environmental impact of cotton farming. The BMP process is very involved, with training, planning, and auditing key parts of the program. Around 60% of cotton in Australia is produced on farms in the BMP program. Waste management (particularly management of chemical and container wastes) is recognised as a key priority in the program, and as a key risk in the risk assessment process attached to it:

¹ Nursery & Garden Industry Australia :Ecohort Handbook” 2007 pp. 40-43,

² Dairy Australia “DairySAT handbook’ p.41.

“WASTE

Risks:

Environmental contamination from the creation of large amounts of waste, improper storage or disposal of waste.

Controls:

Establish a waste reduction plan that aims to minimise the amount of waste created on the farm, and to ensure that all waste is disposed of safely

Be aware of the amount and types of waste created on the farm; for example, take an inventory of waste generated in a week;

Use reusable and recyclable products and material where possible;

Reuse or recycle products, materials and packaging where possible;

Avoid buying excess products or materials; for example, only buy the amount of pesticide to be used during the season;

Buy pesticides in reusable, returnable or recyclable containers;

Triple rinse pesticide containers as soon as emptied, and add the rinse water to the application tank;

Clean pesticide application equipment after use; ensure that wash water is drained to a sump or evaporation pit;

Take used oil to recyclers where possible;

Take lead acid batteries to recyclers where possible;

Ensure that all waste is disposed of properly; avoid disposing of waste on farm; ensure waste is transported to local landfills (tied down and covered); confirm that the local landfill is able to take the type of waste intended to be disposed of if in doubt.”³

- **ChemCert training:** QFF and its members strongly encourage producers and their employees to undertake training on chemicals management through ChemCert and other similar programs. The ChemCert accreditation training resource includes a chapter on safe disposal.
- **ChemCollect and drumMUSTER:** QFF and its members have been strong supporters of drumMUSTER and ChemCollect, which have been highlighted in the paper as particular success (p.19). Product levies underpin these programs, although ChemCollect also relies on support from Government agencies. ChemCollect collects group 1 chemicals at no charge, but charges a fee for group 2 chemicals. ChemCollect has offered primary producers a 25% discount on the cost of removing unwanted herbicides and pesticides, but is finding that that primary producers are dropping out of the program due to not being able to afford, or, unprepared to pay the 75% of the quotation to have their unwanted herbicides and pesticides removed by the service. These problems were highlighted in correspondence we received from ChemCollect relating to their 2007 pick up proposal:

“I am currently setting up to undertake ChemClear’s second collection scheduled for September 2007. Over 58 Shire Councils are planned to be visited under this collection run. We have received a tremendous response from the booking line with over 57 tonnes of unwanted pesticides, herbicides and veterinary products registered for collection and disposal.

³ Cotton Industry Best Management Practices Manual 2000 Risk Management p.11

“Unfortunately, we have 61 farmers who have registered with unwanted Group 2 classified chemicals, and only, \$9,558.62 remaining to support the collection of these hazardous ag and vet chemicals. I have copied you in below with a letter I forwarded to.... the QLD Department of Environment who originally provided us with \$18,000.00 to support the removal and disposal of Group 2 chemicals from primary producers. We collected and disposed of 2,735.86 lt/kg in the May 2006 collection across Queensland which utilized the first portion of the funding.

“In this letter I have requested further funds to support the 61 primary producers that have registered, unfortunately his reply is not positive and we may have considerable drop off in primary producers taking up the opportunity to dispose of their unwanted hazardous products due to cost restraints.

“Are you aware of any other funding available for the clean up of hazardous agricultural chemicals in the state?”

QFF would hope that the EPA would find the resources to ensure that proven waste management programs like ChemCollect are able to do their very important job effectively.

In summary, QFF and its members take waste management issues seriously, and have been including waste management into industry best practices through their Farm Management Systems. QFF would seek ensure that the State’s Waste Management Strategy complements and re-enforces the uptake of industry best practice.

Principles of the Queensland Waste Strategy.

The four proposed principles on waste management (the waste hierarchy; product stewardship; user pays and the proximity principle) provide a degree of rigour of the proposed strategy. The waste hierarchy in particular is very important, and is more about behaviour rather than policy. The sentiments reflected in the FMS programs described above very much reflect that hierarchy, and Government policy should encourage better practice as much as possible.

Rural industry already participates in product stewardship programs in terms of chemicals. There could be a case for developing a product stewardship/recycling program for plastic sheeting. It is worth noting that the DairySAT manual recognised this, although parts of the manual were Victoria specific (which has a recycling program for sheeting). Government should give consideration to funding the development of further product stewardship programs (e.g. plastic sheeting) in partnership with industry.

The user pays principle is a little more difficult for rural industries, and its application could have perverse consequences. It is in the public interest to encourage primary producers to use regulated landfill sites rather than simply dumping materials on their property, particularly where the items being dumped could have environmental impacts. However, it is almost impossible to regulate such dumping, and encouragement, education and incentives is the best means of ensuring that public landfills are regulated rather than private sites. The introduction of landfill levies could have an impact on producers’ decisions to travel to landfill sites.

The proximity principle in the promotion of regional and local recycling and reuse would also be supported by regional communities, but clearly needs more development.

Landfill Levies

The discussion paper expressly raises the issue of landfill levies, which apply at varying rates in other states. The possibility of a levy raises several questions:

- If the levy is set too high, primary producers may choose to dump materials on their own property, which could defeat the purpose of the strategy as a whole;
- Users need to know that the proceeds of the levy are properly hypothecated back into the waste strategy rather than into Treasury coffers. Levy income could help overcome issues like underfunding of waste programs such as ChemCollect and the development of new product stewardship and recycling efforts;
- Other states distinguish between metro and non-metro levies (in SA, the latter is half of the former). The discussion paper appears to reject this approach, which could have perverse consequences given the greater opportunities for dumping in non-regulated sites in non-metro areas. Given the longer distances that many primary producers would need to travel to get to a landfill site, a flat fee could make it more expensive for rural industries than urban industries when transport is taken into account;
- A 'performance-based' landfill levy would probably result in lower fees for metro landfill sites rather than non-metro sites because larger sites are more likely to be able to afford to implement more advanced practices.

In summary, if a landfill levy is introduced, QFF would favour a distinction between urban and rural residents as an incentive for rural residents to use land fill sites. If this is not done across the board, an alternative could be the provision of vouchers to rural landholders. The Government might also give consideration to a full waiver of landfill fees if the business is in a recognised environmental management system or Farm Management System that addresses waste. Providing incentives for such systems is the best way of encouraging the changes of behaviour that should result in improvements in waste management and prevention.

Other policy proposals:

Targets and bans are meaningless unless backed up by public funded programs to deliver the target. QFF opposes the imposition of materials specific targets on rural business (e.g. timber, concrete, green waste) as it is unlikely that such targets would be meaningful. Rather, we would encourage a continuing dialogue between government and industry on the identification of best practice that meets the FMS objectives of profitability and sustainability.

Considerable thought would need to be given to the development of Pay as you Throw principles to rural industries. Such policies make no sense without an underpinning of identified industry best practice. What is 'best practice' would differ from commodity to commodity and farm to farm. Pay as you Throw could quickly become just another revenue source for government rather than a waste management strategy.

Product stewardship programs are familiar to rural industries with drumMuster and ChemClear. QFF is of the view that there is considerable scope to advance further product stewardship programs on a voluntary basis across industry. Funding should be allocated to encourage the development of such schemes. Our experience with ChemClear and drumMuster is that strong industry support and community education are essential for the success of such schemes.