



The Department of State Development, Infrastructure, Local Government and Planning  
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21 October 2021

Dear Sir/Madam

**Re: Draft State Infrastructure Strategy**

The Waste Management and Resource Recovery Association of Australia (WMRR) welcomes the opportunity to provide feedback on the Department of State Development, Infrastructure, Local Government and Planning's draft *State Infrastructure Strategy*.

WMRR is the national peak body for the \$15.5 billion essential waste and resource recovery (WARR) industry. Nationally, we have more than 2,000 members representing over 500 entities that operate in a broad range of government organisations, the three (3) tiers of government, universities, and NGOs.

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, manufacturing of valuable products from resource recovered materials, energy recovery, community engagement and education, and responsible management of residual waste.

WMRR supports the department's intent to develop a State Infrastructure Strategy that presents a clear vision of the Queensland government's infrastructure requirements over the next two (2) decades, one that provides clarity around the challenges and opportunities Queensland may face, and a strategy that aims to align infrastructure investment across state government to inform industry and all levels of government.

*An essential industry*

The WARR industry provides an essential service to government, communities, and businesses across Queensland, while playing a vital role in protecting the environment and enhancing the economy, including the mitigation of carbon emissions, which notably, is a priority for the government and one of the focuses of the department's infrastructure strategy. Further, we have seen in recent years the vital importance WARR infrastructure plays in times of natural disaster, as well as the importance of understanding the challenges in times of pandemics for hazardous waste. Planning for such uncertain times must become commonplace.

In Queensland, the WARR sector currently employs more than 11,800 people and contributes \$1.5 billion to the state's economy. WMRR acknowledges that over the last five (5) years, the Queensland government has been ramping up its efforts to stimulate investment to grow the economic opportunity that the industry offers, including through the implementation of the waste levy, and the

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introduction of the Containers for Change program. There are also myriad policies and strategies that have either been implemented or are close to finalisation, including the Waste Management and Resource Recovery Strategy that sets out targets for 2025, 2030, 2040 and 2050, the energy from waste policy, and impending organics strategy. Pleasingly, there has also been an uptake in the reuse of materials in construction, as recently seen in the Department of Transport and Main Roads' support for the reuse of glass fines in civil construction, specifically in general earthworks, unbound pavements, and as aggregates for asphalt.

We have also witnessed the significant investment being made by the state government and industry in the WARR sector to facilitate the development of a robust and sustainable WARR network in recent times, in particular, \$193.8 million in funding has been leveraged through the Resource Recovery Industry Development Program (RRIDP) to-date, as well as the \$40 million Queensland Recycling Modernisation Fund (QRMF) that is jointly funded by the federal and state governments, and co-funded by private industry.

These efforts are supported by the WARR industry, given they will assist in driving the state's capacity and capability to recover, recycle, reprocess and remanufacture domestically, leading to growth of local economies and jobs in Queensland, while delivering other beneficial outcomes for the environment and community. It is also pleasing to see that broadly, there has been a shift in thinking – evident across all jurisdictions – towards sustainable material management and how end-of-life materials must be returned to the supply chain to be processed and reused.

#### *Lack of alignment*

Despite the essential nature of the WARR sector, coupled with the significant efforts by government to drive the industry, what is evident in this draft strategy is the lack of emphasis on WARR infrastructure planning to complement and support the infrastructure proposed within this strategy.

WMRR notes that the department is asking stakeholders to consider whether “tackling waste and the circular economy” should be considered as an additional cross-government priority and is aware that the draft strategy highlights the importance and opportunities of the WARR sector, such as:

- An acknowledgement that infrastructure should consider environmental vulnerabilities and supports decarbonisation, waste minimisation, and resource use.
- Consideration of how the Brisbane 2032 Games will deliver positive environmental impacts, including through enhanced waste management as well as related infrastructure programs targeting zero net waste.
- Exploration of opportunities to re-use WARR materials in transport infrastructure, such as for earthworks and drainage construction, as well as crumbed rubber in road construction.

This however, is the extent of emphasis on WARR infrastructure, which is sorely lacking. By the government's own account, as noted in the recently released Queensland Waste and Resource Recovery Infrastructure Report, mitigation of environmental impacts can be achieved through good design and best practice operational management; however, there is still insufficient forward planning or ineffective planning controls for WARR infrastructure.



WMRR queries why this draft infrastructure strategy, while noting the importance and opportunities of WARR as well as highlighting industry development programs (which the department administers), has failed to:

- Include WARR and the circular economy as one of the cross-priority programs in this version.
- Consider and align the objectives and future outcomes on the department's RRIDP, which aims to support projects and initiatives that will deliver an additional \$193.8 million in capital investment and creating more than 360 jobs across Queensland, as well as the QRMF.
- Factor in the state's WARR strategy which sets out targets to 2050 that will play a key role in informing essential WARR infrastructure for the next two (2) decades.

#### *Key recommendations*

##### **1. A cross-government priority**

WMRR strongly advocates for the consideration and inclusion of the WARR industry in the government's long-term asset planning as an indispensable component of a robust and transparent framework, which would enable decision-making that underpins and supports Queensland's economic and social systems, including its health and emergency systems.

The essential WARR sector, for the reasons throughout this submission, must be included as a cross-government priority where the same consideration is given to the necessary cross-government priority actions outlined in the draft strategy for the other priorities, and in line with the current government WARR-specific investments and initiatives, as well as strategies and policies.

##### **2. Land-use planning**

WARR services and infrastructure are absolutely essential to the government, community and environment, and they need to continue to be regarded as such. This recognition must also be extended within the planning and development system to preserve and ensure necessary land-use and access rights, as well as to adequately provide for new services and infrastructure.

Land-use planning is a critical part of planning for WARR infrastructure. As part of this infrastructure plan, the department must consider and address the significant and ongoing encroachment into buffer areas that has a profound negative effect on the WARR industry.

In siting and operating waste and resource recovery facilities, the availability of land with adequate buffers and the protection of those buffers throughout the operating life of these facilities are important. Often, land with adequate buffers is only available at locations that are at a significant distance from the source of materials to be processed or disposed of; in inner city suburbs, retention of land with buffers that is close to the source of generation is not always possible, viable, or sustainable. Additionally, as it is cost prohibitive for most

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operators to own the required buffers, incompatible development may occur in the buffer zones.

Thus, WMRR urges the department to protect and safeguard suitable buffer distances and identify long-term locations – WARR precincts - to ensure that infrastructure can be built to meet future demands and the needs of a resource efficient economy.

### 3. Cross-department collaboration

It is important that moving forward, the Department of State Development, Infrastructure, Local Government and Planning considers how it can and should continue to collaborate with the whole of government, including the Department of Environment and Science and Emergency Services; the former, as noted above, has released a waste strategy that sets out both targets and the investment required for the state's WARR infrastructure over the next 30 years, as well as more recently, its 2019 WARR infrastructure report, which provides a baseline understanding of existing infrastructure and future needs to support the development of the new infrastructure required to achieve the waste strategy objectives and help Queensland transition to a circular economy.

Finally, WMRR encourages the department to consider how it can ensure that all state and local government infrastructure investment is supported by mandated targets to drive the procurement of recycled content in all new infrastructure.

Please do not hesitate to contact the undersigned if you would like to further discuss WMRR's submission.

Yours sincerely

Gayle Sloan  
**Chief Executive Officer**  
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